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Tera

Chairman Marshall Miller
Dr. Cade Y. Hand
Dr. Emmett Tuebke
Nuclear Regulatory Commission



50-369/310

Nov. 17, 1988

Dear Chairman Miller, Dr. Hand,
and Dr. Tuebke,

I have read the ruling of the
licensing board on the application
of Duke Power Co. to move spent fuel.
The reasons given for denying the
application are practical and
reasonable.

The Interagency Review Group
on Nuclear Waste Management
found that the cost of a truck
shipment is \$4000 for each spent
fuel element. This must be added

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to the cost of space in whatever fuel pool is used. In the case of Duke, there was a probability of each element making several \$4000 trips. Therefore, the Stone & Webster price of building new storage pools at Oconee for \$10,000 per element is reasonable. For Duke to maintain that they will close Oconee rather than build new pools is a little like throwing away the new Cadillac when the ashtrays are full.

It is both cheaper and safer to move spent fuel only once - from the power plant where it is produced to the permanent disposal site. If temporary storage pools are needed they should be at one of these two locations.

With 16,000 spent fuel elements now in pools at power plants and new ones coming out of reactors every 2-3 hours, we urgently need control over random shipments.

Sincerely,
Virginia Dykes

Please note on page 46 of ruling:

According to the Interagency Review Group Report, only 10% of spent fuel shipments are made by truck, and 90% by train (in much stronger casks). The 3,600 shipments referred to in the ruling include both truck and train. It should be noted that there were two serious highway accidents out of ^(10% of 3600) 360 highway shipments. In both cases the cask left the truck.