

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
ATTN: Director, Division of Licensing

May 10 1982 MAY 12 1982



RE: OCRE COMMENTS ON DES FOR PERRY NUCLEAR POWER PLANT,
DOCKET NOS. 50-440/441. (NUREG-0884)

Ohio Citizens for Responsible Energy ("OCRE"), an Intervenor in the operating license proceeding before the Atomic Safety and Licensing Board for the Perry Nuclear Power Plant, hereby files its comments on the Draft Environmental Statement for Perry, NUREG-0884.

First, OCRE requests that the comment period on the DES be extended for the convenience of the public. Since this is one of the few instances in which the NRC has invited public comment in its review of the Perry facility, OCRE feels that the public should be accommodated to the fullest extent possible.

COMMENTS

1. OCRE disagrees that an analysis of production costs (DES Sec. 2.2) shows a strong economic justification for operation of the facility because the capacity factors used by both Staff and Applicant in the analyses are unrealistic. Based on the operating experience of the two CAPCO nuclear plants in operation, Davis-Besse and Beaver Valley, OCRE suggests using a capacity factor of 35%. Using this figure in the cost analysis would result in savings if PNPP is not operated and the same quantity of electricity were generated using coal.
2. The NRC also considers the diversity of fuel supply provided by the operation of PNPP to be a factor favoring its operation. The only problem foreseen that could cause a fuel shortage is a strike by coal miners. Such strikes could easily be averted by providing better wages and working conditions for miners. OCRE suggests that the \$4 billion plus invested in PNPP could have been better spent in that manner; OCRE does not believe in investing in technology at the expense of humanity.
3. As far as the NRC's contention that operation of both PNPP units will result in "significant cost savings for area customers" (DES at p. 2-5), OCRE would suggest that the NRC explain their view to the public at the next rate hike hearing. A 17% rate hike request by CEI is currently pending before the PUCO; this is the first (but undoubtedly not the last) such rate hike to include the costs of Perry.
4. OCRE disagrees with the statement (p. 3-1, second footnote) that there have been no changes in alternative energy sources since the publication of the FES-CP. The FES-CP was released in 1974; to say that there have been no

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advances in alternative energy technology since 1974 is totally absurd. The NRC also does not seem to consider conservation to be a viable alternative to energy consumption and the construction of additional generating facilities. Conservation is the most important alternative. The Applicant could encourage conservation by the use of innovative pricing structures, e.g., time of day pricing. Unfortunately, the Applicant has encouraged the increased use of electricity through their rate structures, promotional advertising, and by providing lower rates to those owning all-electric homes.

5. Section 5.9.4.1.4.6, Risk Considerations, is deficient in several respects. First, the attempted comparison of the economic risks of nuclear accidents to the risks of accidents, and continual emissions, from the use of fossil fuels to generate electricity neglects several important differences. A fossil fuel generating plant does not accumulate the fission product inventory present in nuclear plants. An accident at a coal plant would never require evacuation of the public, as no danger of prompt fatalities would exist. The continual emissions of sulfur dioxide and nitrogen oxides which can cause acid rain can be controlled through the use of scrubbers. Utilities, however, have resisted the installation of such equipment at their fossil fuel plants.

Secondly, OCRE considers the comparison of nuclear risks to other accident risks encountered by the public to be reprehensible. People engaging in activities involving risk such as driving automobiles, flying in airplanes, using firearms, smoking cigarets, etc. do so voluntarily with an understanding of the risks involved and perhaps even some degree of control over them. The Perry Nuclear Power Plant was forced upon the people of Northeast Ohio without their knowledge or consent. The people did not ask the Applicant to build a nuclear plant at Perry. There is still no significant unbiased national debate or educational program on the full risks of nuclear power (nor are these risks fully known, even to the experts). The public participation afforded by the NRC's licensing process has been ineffective, largely due to the vast economic inequities between the parties involved. The public is forced to either accept living near a nuclear plant such as Perry, or move away. Obviously not everyone is in a position to do so.

6. OCRE considers the relationship between short-term uses and long-term productivity (Sec. 6.3) to be a crucial issue of the nuclear power debate. The 2 Perry units will cost at least \$4 billion, and will have a lifetime of 40 years, if that. This lifetime is limited by physical factors, i.e., the severe environment, with neutron activation and embrittlement of components and radiation-induced degradation of materials, found in nuclear reactors.

In comparison, fossil fuel plants do not have this severe radiation environment, and can be expected to operate for a much longer time. For example, the Painesville Municipal Light Plant is around 100 years old and is still operating. Of course, equipment and components have had to be replaced over that time, but this could be done quickly and easily without exposing workers to radiation. Fossil fuel plants are also more efficient in their conversion of chemical energy to electricity. Therefore, fossil fuel generation of electricity is advantageous from the viewpoint of the most efficient use of resources. Fossil fuel plants also do not produce radioactive wastes or require de-commissioning after their useful life has ended. Fossil fuels, particularly coal, do not require the energy-intensive refinement process necessary for uranium. The 3 gaseous diffusion plants in the United States use more electricity than the entire continent of Australia. One might question whether the energy spent in enriching uranium for use in reactors is ever recovered in the operation of the reactors.

Other alternatives, e.g., solar, wind, hydroelectric, and conservation, are even more superior to nuclear than is coal in terms of commitment of resources and long-term productivity. A complete comparison of alternatives would indicate that the operation of PNPP is the least desirable option.

7. OCRE contends that the analysis of occupational radiation exposure for BWRs (Sec. 5.9.3.1.1) is faulty because it neglects the newest data which shows that occupational radiation exposure in nuclear power plants is increasing dramatically. Average exposures at BWRs rose 55% in 1980, from 733 to 1136 person-rems (Critical Mass Energy Journal, Oct./Nov. 1981, pp. 8-9).
8. OCRE questions the projected population growth around PNPP given in Sec. 4.3.1. Lake County is characterized as having slow population growth. The undersigned OCRE Representative, having been a life-long resident of Lake County, strongly disagrees with that statement; on the contrary, Lake County has experienced great growth in recent years. The eastern end of the county especially is now the site of increasing commercialization. It is the areas in closest proximity to the Perry plant which are now experiencing the greatest growth. The Madison area especially (which is down-wind from PNPP) is growing rapidly. OCRE believes that the plant is located too close to populated areas, and special emergency preparedness may be needed, or PNPP should operate at lower power levels. Of course, the latter option would make PNPP even less competitive with alternatives.

OCRE has many other differences with the Staff's analysis in NUREG-0884. However, since OCRE's objections are too numerous to pursue herein, and since most of these objections relate more to the NRC's methodology than to the specifics of the PNPP facility, OCRE will pursue other routes in addressing these concerns.

Respectfully submitted,

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