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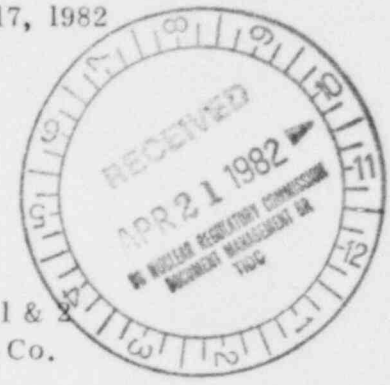

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attention: Director, Division of Licensing

Comments on Draft Environmental
Impact Statement, Midland Nuclear Plants, Units 1 & 2
Docket No. 50-329 and 50-330, Consumers Power Co.

The DEIS for the Midland nuclear plant (NUREG-0537) has been developed based on erroneous assumptions of extraordinary magnitude and the deliberate exclusion of many significant costs, health effects and environmental considerations.

Among these are the following:

1) Excluding construction costs of these plants in the cost-benefit analysis. (DEIS 2-2)

2) Failure to evaluate the economic impact on the major industries of Michigan.

3) Omitting the loss in property values of homes and farmland in the area in the cost-benefit analysis.

4) Omitting the health care costs now and for future generations in the cost-benefit analysis.

5) Use of an inappropriate model for an evaluation of the affects of the cooling pond.

6) Failure to discuss the combination of the overlapping chemical, thermal and radioactive environments of The Dow Chemical Co. and the nuclear plants --and the synergistic effects this will produce--a condition that is unique and requires special study at this site.

7) No analysis made of the impact of storing hundreds of tons of high level nuclear wastes on site for any extended period of time near an industrial complex and a population center, since no method for the storage of high level wastes exists at the present time or for the forseeable near future.

8) No evaluation made of the unique problems of transportation of high level wastes through a heavy industrialized, highly populated area.

9) No discussion made of the long term health effects of the entire nuclear fuel cycle from routine operation of these plants which reaches into thousands of years.

10) No recognition of new developments in radiation protection standards in calculating exposure for the public and workers.

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Cost-Benefit Analysis-Omission of Construction Costs

One example of the omission of an important factor in the cost-benefit analysis for these nuclear plants is its treatment of construction costs. The construction costs, exacerbated as they have been by a series of major quality control errors by Consumers Power Co. and Bechtel, have been eliminated from consideration in the cost-benefit analysis (DEIS 2-2) in order to provide a favorable and totally fictitious picture of benefits. Yet it is known, and the data exist, to show that the extraordinary construction costs of the Midland nuclear plant will have a dramatic adverse impact on industry in this state, as well as Consumers' Power Co. ratepayers. The nuclear plants can not be placed in the rate base until they are completed, and so their costs must be a part of future "real world" considerations.

When the cost increase of these plants to $3.1 billion was announced early in 1980, a General Motors' spokesman said the potential consequences for industry in this state are "horrendous". It was estimated then that electric rates would increase by one-third. (Wall Street Journal, March 4, 1980)

Since that time the new cost estimate has increased to $3.4 billion. The full cost of the extensive remedial work for the soils problem now underway is as yet not known and could make this figure much higher.

One major industry, the Goodyear Tire and Rubber Co. of Jackson, Michigan, has already threatened to leave the State of Michigan because the costs of electrical power here are 28% higher than in other neighboring states. (Letter, Attorney-General Frank Kelley, November, 13, 1981)

In an effort to assess the effect of these runaway costs on Michigan's economy, the Michigan Attorney-General's office and the Michigan Citizens' Lobby (AG-MCL) developed an indepth analysis of the costs of the Midland nuclear plants as part of Case No. 6360 in 1981 before the Michigan Public Service Commission in which Consumers Power Co. was seeking approval of securities to continue construction at Midland, as well as the lifeline rate case U-6490. That study showed that Midland power would cost about 14¢/kwh in 1984 delivered to retail customers, or about 2 1/2 times the average delivered cost of Consumers Power Co. electricity at present.

This indepth study contained in the Brief of AG-MCL concludes that it would be less expensive to ratepayers by $484 to $1,135 million to stop Midland construction, build equivalent coal units, and even return the present sunk cost of Midland back to the Company once all addition projected costs to completion, including decommissioning are considered for this facility.*

The study assumed that Consumers Power Co. was correct in predicting 3% annual growth. The savings to ratepayers shown in the AG-MCL study would be even larger if lower load growth rates are assumed. In a very recent study the consultants, the Energy System Research Group of Boston, projected Consumers Power Co. long-term growth at about 1-1 1/2% annually. The NRC has a legal obligation to consider these load forecasts by a state office.

The U.S. NRC Practice and Procedure Digest---Supplement 1 to Digest No. 2---NUREG 0386 (Feb., 1980) states that "considerable weight should be accorded the electrical demand forecast of the state's utilities commission that is responsible by law for providing current analysis of probable electrical demand growth and which has conducted public hearings on the subject."

"A party may have the opportunity to challenge the analysis of such commissions. Nevertheless, where the evidence does not show such analysis is seriously defective or rests on a fatally flawed foundation, no abdication of NRC responsibilities under NEPA results from according conclusive effect to such a forecast." Carolina Power and Light, (Shearon Harris Nuclear Power Plant, Units 1-4) ALAB-490, 8 NRC 234, 240-41 (1978).

Fairly optimistic operating conditions were assumed in the AG-MCL study.

However, if the Midland nuclear plants (1) operated as poorly as Palisades (also built by Bechtel), or (2) should it shut down as Three Mile Island has, or (3) should it not run 34 years as assumed in the analysis (no nuclear plant has), but only 15-20 years, or (4) should there be high interim retirement of the plants' components because of metal fatigue from radioactivity, these plants would be an unbearable disaster financially, according to the study.

The Midland nuclear plant cost is larger than the whole existing net utility plant of Consumers Power Co. While these plants will increase net utility plant--which

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*Consumers Power Co. Campbell #3 770MW coal-fired plant, built from 1974-1980, cost $600 million. Cost for Midland is $2,000 per kwh, --cost of Campbell #3, $800 per kwh.

includes transmission and distribution--by over 100%, they will only increase net system generating capability by 19%.

The impact on rates of placing an increase of more than 100% in the rate base of net plant utility, if Midland goes into commercial operation, will be staggering.

Dr. Richard Rosen, expert witness and physicist, determined that the trend of cost over-runs is almost without comparison at Midland and that they relate quite specifically to the nature of Consumers Power Co.'s management of the project.

The soil settlement problem has become a significant additional cost which must be added to the calculations of the AG-MCL study to further skew the cost-benefit analysis against these nuclear plants. It has already been identified that the soil settlement problem is a major and recent quality control problem--one out of a long and alarming history of such problems--that is a part of the record of this plant's construction. (Memo to H.D. Thornburg, from James E. Keppler, Director, Region III, Midland Summary Report, February 15, 1979)

Failure to consider these costs in the cost-benefit analysis of the DEIS is gross negligence.

As for the need for steam and power for Dow, that Company has already stated that they plan to build a power plant using their newly developed coal gasification process if the Midland nuclear plants don't come on line according to their contract with Consumers Power Co.

This alternative power source for the needs of The Dow Chemical Company would meet the NEPA considerations which state that unless a "proposed nuclear unit has environmental disadvantages when compared to alternatives, differences in financial costs are of little concern." (Ibid, VI-Gen. Matters - NEPA 12.2.6) Public Service Co. of Oklahoma et al.) (Black Fox Station Units 1 and 2, LBP, 78-26 8 NRC 102, 161 1978) Coal gasification power plants have definite environmental advantages over nuclear plants, especially in a populated area.

Cost-Benefit Analysis-Omission of Loss in Property Values

Distance and shielding have always been key factors in considering the safety of nuclear plants. The site of the Midland nuclear plants as part of the City of Midland,

and in the middle of a populated area, has eliminated distance as a safety factor. The DEIS admits that their will be impacts on area farmlands from birds attracted to the pond and from fogging. These factors diminish the desirability of homes and agricultural land in the vicinity of the nuclear plant, with the result of a drop in their salable value. (Impact of the Nuclear Industry on Real Estate Values, James L. Terry, University of Michigan, Nov., 1976).

Cost-Benefit Analysis-Omission of Health Care Costs

Another significant omission from the cost-benefit analysis was that of health care costs, both somatic and genetic, that will be an inevitable result of the operation of these plants.

Dr. Joshua Lederberg, a Nobel Laureate geneticist, who testified before a Congressional Committee (July, 1970) on these costs, gave a special warning on the burden of genetic disease caused by radiation. He said that over a period of generations the health costs of the additional mutations caused by routine radiation releases from U.S. nuclear facilities would be about $10 billion a year. (Report on Congressional Testimony, Washington Post, July 19, 1970)

Some of that cost must be anticipated by the people of this area and their future generations as a result of the operation of these plants and should have been included in the DEIS.

Cogeneration-A Questionable Description

Characterizing these nuclear plants as cogenerating facilities because they produce steam and power is inaccurate. The term "cogeneration" refers to the use of waste heat by a facility producing steam and power, or both. There is only a marginal use for waste heat from these plants and that is for heating the cold water that Dow will supply for use in their process steam. The rest of the waste heat will go to the cooling pond, to the Tittabawassee River and to the air.

Ground Water

While the DEIS states that no ground water will be used for plant operations, (DEIS 4-2) the water that is seeping from the cooling pond will be contaminated and can affect the ground water. Besides chemical wastes, the laundry wastes going into the pond can contain radioactive contaminants and through seepage from the pond reach the land area and the ground water in the vicinity. This may violate Michigan ground water protection regulations.

Cooling Pond Effects

The data on the cooling pond in the DEIS (Table 4.1-4.2) is based on a model that does not represent the NRC's best available data on ponds in the Midwest, according to information supplied by James Carson, meteorologist from Argonne National Laboratory.

The original cooling pond data which was used for the construction license to calculate fog affects was supplied by Bechtel and again used in this DEIS (4-7, 4-8) was taken from a pond in Arizona and was not appropriate or comparable to fog effects from a pond in the Midwest, according to the NRC.

On September 14, 1978, Mr. James Carson met with Midland officials, Clifford Steff of the Midland Planning Commission and Gordon Solberg and William Fortier of the Road Commission. Mr. Ron Cook, NRC resident inspector of the Midland nuclear plants, was present at the meeting, as well as a representative of Consumers Power Co. and William Olmstead, NRC attorney.

Mr. James Carson pointed out that the NRC had more accurate data on cooling pond effects based on the Dresden cooling pond in Illinois which had been operating for several years.

James Carson stated that the people in the area of the cooling pond would be subjected to hundreds of hours of steam fog from the cooling pond every winter. They can expect icing on their homes, outlying buildings, equipment, trees and animals. He said much additional snow will be generated in the area. These effects will occur primarily from November through March. (These data are confirmed, but only in part, by the DEIS, 5-8)

Mr. Carson said that at the Dresden pond, the water is running 90° hotter than the outside temperature. For example, when the air temperature is -20°F., the pond is measuring 70° F. and producing huge quantities of dense fog. Fog plumes up to 5 miles have been observed at Dresden. The DEIS limits this to 1.6 to 3.2 km or (1 to 2 miles) (DEIS 5-7).

The DEIS admits that the Midland cooling pond will be hotter than the Dresden pond because it is smaller--880 acres at Midland as compared to 1,275 acres at Dresden, according to Carson.

The severe fogging will often create zero visibility on area roads, and Mr. Carson recommended that roads be widened and flashing signals installed to warn motorists of these road conditions. He recommended closing of Gordonville Road during heavy fog. The DEIS merely recommended a study in the area to determine the highway safety effects of the fog. (DEIS 5-8)

Since the inappropriate Bechtel model from 1973 was used for calculations of the effects of the heat load on the pond (DEIS 4-7, 4-8), instead of the Dresden pond, the calculations given are incorrect and not applicable.

A greater heat load from the pond would indicate a much greater rate of evaporation. The amount of water available for cooling in the pond will be lost at a greater rate than these data in the DEIS indicate and other resources of cooling water may need to be provided.

This is another glaring example of the erroneous assumptions in the data base of the DEIS that distorts the real environmental impacts.

The Effects of Multiple Radiological Impacts

The DEIS section on radiological impacts does not take into account the manner in which these impacts will be concentrated in this area that will be injurious to public health and safety. (DEIS 5-9)

For example, Dr. Edward Epstein, meteorologist from the University of Michigan, who testified at the construction permit hearings in July, 1971, pointed out that the gaseous effluents routinely released from the nuclear plants will be entrapped in the fog from the cooling pond and will cause a build-up of radioactivity in the area. The projections for radiological impacts in the DEIS do not take this into account. Besides the surface build-up of radioactivity, some of that entrapped radiation will reach the cooling pond and can ultimately seep out to the surrounding area. It can also reach the ground water since it will be iced out or rained out in the area.

On October 22, 1971, at a seminar at the University of Michigan nuclear engineering department, Dr. Epstein described the extent of the fogging problem and the radioactivity on the area and said, "I don't know how those people are going to live."

Other information on the manner in which radioactive releases can reach and concentrate in the environment comes from numerous other sources. The DEIS does not take these into account.

For example, Dr. Edward Teller in an article published in the Journal of Petroleum Technology, (May, 1965, p 506) stated:

> "In principle, nuclear reactors are dangerous. They are not dangerous because they may blow up . . . But a powerful nuclear reactor which has functioned for some time has radioactivity stored in it greatly in excess of that released from a powerful nuclear bomb. There is one difference, and this difference makes the nuclear bomb look like a relatively safe instrument. In the case of an atmospheric nuclear explosion, the radioactivity ascends into the stratosphere and is widely distributed and diluted . . . before returning to the ground."

> "A gently seeping nuclear reactor can put its radioactive poison under a stable inversion layer and concentrate it into a few hundred square miles in a truly deadly fashion."

Since the site of the Midland reactors is in the flood plain area of the Saginaw Valley, inversions are not an infrequent occurrence. This is another source of radioactive build-up in this water shed which will effect the concentrations that will enter the Tittabawassee River and Bullock Creek as a result of the operation of the Midland nuclear plants.

Synergistic Effects of Chemical and Radioactive Effluents

The unique association with, and proximity to, The Dow Chemical Co. of these plants also poses special problems in environmental impact. The extent to which the toxicity of radioactive releases will be increased due to synergistic effects from contacts with chemical pollutants and thermal pollution in this area has not been considered by this DEIS.

These facts are also well documented. In a paper called, "The Effects of Nuclear Power Plants" published by the School of Hygiene and Public Health of John Hopkins University, the following statement is made:

> "It is an ecological truism that in natural environments stimuli do not act separately, but together. Such stimuli acting together to produce a response different in quantity or quality from that which is observed when they act separately is defined as "synergism". Heat may influence radioactivity in several ways, namely by altering community and current structure."

> "What is clear is that thermal pollution alters both physiochemical properties of water and the metabolism of organisms. In so doing, it may significantly alter the distribution and abundance of organisms.

> With such alterations, the distribution and abundance of contained contaminants will also be expected to be altered. This environmental synergism between heat and the distribution of other pollutants makes predictions on the effect of the latter extremely difficult. Radionuclide distribution at present, then, is not necessarily an indication of its distribution in an altered community."

Dr. Irwin Oster, former director of Genetic Research at Bowling Green State University, Bowling Green, Ohio, wrote the following statement:

> "It is of paramount importance to recognize that the additivity between chemical agents and radiation exists at the level of the actual damage produced, and this is the level at which interaction takes place--it is not merely the summation of the damage produced by one noxious agent and the damage produced by another toxic agent. By way of emphasizing this point, we can describe the effect as follows: Exposure to one dose of radiation plus one dose of chemical mutagen (and/or carcinogen) yields the same end-result in terms of over-all damage as being exposed to two doses of radiation. Furthermore, the same linear non-threshold model, coupled with cumulative effects, holds true for such chemicals." (Letter, October, 1971)

In a statement before the U.S. Public Health Symposium, September 8-9, 1960, on "Physiological Aspects of Water Quality", Dr. C. Heupner made the following statement: (Symposium Report, page 185)

> "In addition to direct radioactive effect of such water pollutants on consumers, attention should also be paid to direct and indirect radiation effects by radioactive matter on other chemical constituents, especially those of industrial origin which may simultaneously contaminate the water. Such effects may be associated with chemical changes elicited by the production of peroxides or may be related to intramolecular rearrangements of atoms and groups of atoms, such as polymerization, depolymerization and crosslinkage formation occurring under the impact of ionizing radiations. An exploratory study into the chemical end products of such possible interactions between radioactive and non-radioactive water pollutants seems to be indicated for assessing properly the entire scope of potential cancer hazards for consumers of drinking water containing radioactive pollutants."

As an example of the importance of this concern, two West German pharmaceutical companies sued to halt construction of a nuclear plant in Grohnde a mile away from their operation in June, 1977. They charged that the nuclear plant's radioactive effluents would contaminate their products and affect their quality. (Nucleonics Week, September 1, 1977)

Adverse Health Effects to Susceptible Groups

There is a substantial amount of research that indicates that there are groups in the general population who are more susceptible than others to adverse effects from radiation. Since these plants are in the middle of a populated center, these effects should be considered. Infants and children are known to be at least 50 times more susceptible than the average male adult. (Saginaw Doctors' Report, 1971, p. 47) The elderly are also known to be more susceptible. Dr. John W. Baum states human beings "constitute a heterogeneous population with mixed predisposition to cancer due to genetic differences and sensitivity which varies with age, sex, environmental factors, cell type, stage of cell cycle, etc." (Health Physics, August, 1973)

In NRC's own announcement of improving radiation standards issues on March 21, 1980, they indicate that standards for individual occupational exposure, and the need for special provisions to limit collective population doses and exposures of children, fertile women and other susceptible groups are not adequate and must be improved.

There is no discussion in the DEIS of consideration for susceptible groups in the nearby general population.

New Information on Radiation Standards-Dose Estimates

The announcement mentioned above and posted in the Federal Register by the Nuclear Regulatory Commission in March, 1980, is among the recent events indicating that new significant knowledge on radioactive protection standards has been developing.

Important new studies from the Lawrence Livermore Laboratory can alter the dose estimates in the DEIS by several orders of magnitude. Recently, the 1980 National Academy of Sciences' BEIR (Biological Effects of Ionizing Radiation) Report has been suspended because of new data disclosed this past year by two physicists, William Loewe and E. Mendelsohn of the Lawrence Livermore Laboratory, a weapons research facility of the Defense Department. These researchers found that serious errors were made in the radiation dose estimates of the Hiroshima and Nagasaki atomic blasts. These data had been the basis for much of the current radiation dose estimates, including those in the 1980 National Academy of Science Report. The Livermore studies were first reported in Science, May 22, 1981.

By September, a task force of about 120 scientists was brought together to review these new data. (Science, October 2, 1981) This task force agreed that the dose estimates which have been in use since 1965 can no longer be considered accurate and should be revised in the light of research done at Livermore, two other national laboratories and two private consulting firms.

These findings can substantially alter the dose estimates and calculation of the effects that can be anticipated from the radioactive effluent from these plants and render dose estimate charts in the DEIS obsolete.

Tritium--Produced in Quantity--Misrepresented in Its Effects

Tritium is generated in large quantities by pressurized water reactors. The NRC and this DEIS does not recognize its adverse health effects.

Several experts have commented on the public health significance of tritium, which will be produced and released in quantities from these reactors. Dr. Theodore Rizki in a hearing statement for the Michigan legislature (dated, October 16, 1974) stated:

> "As a biologist and geneticist, I would like to point out that there has been a tendency to underestimate the damaging effects of tritium. In considering radioactive materials in terms of energy levels, we are often misled by assuming that tritium is a weak beta-emitter. Our thinking must be altered; we must underline the fact that once tritium is incorporated in a biological molecule such as DNA, the degree of concentrated ionization within a hundred-thousandth of an inch is so high that to achieve the same effect from background radiation would require enormous amounts of deep penetrating radiation."

Dr. Charles Huver, radio-ecologist of the James Ford Bell Fisheries Laboratory of the University of Minnesota, made the following statement on the biological effects of tritium at a hearing on February 19, 1969:

> "In cognizance of the dominant position of this radio-isotope (tritium) in the effluents of nuclear reactors, it would be irresponsible for persons charged with the protection of public health or with providing consultation on the safety aspects of nuclear discharges to ignore the biological effects of tritium in the intracellular environment.
>
> There has been a tendency, especially among those concerned with the promotion of the nuclear industry, to ignore or to minimize the biological significance of tritium. However, there is now such a large body of evidence available in the literature of radiation biology that to continue to ignore tritium would be an admission of a serious lack of knowledge of nuclear safety.

> Tritium generally enters the body in the form of tritiated water (THO) and is transported through a variety of metabolic pathways to become widely distributed and incorporated into a wide array of biological molecules.
>
> Because tritium becomes incorporated in the DNA molecule (among others) the problem of genetic mutation and chromosome damage has to be faced. For instance, Gray (1959) has reported the remarkable result that B-rays of the energy of tritium are about 2.5 times as effective in producing chromosome breaks as are X-rays. Assuming the oftenheld view that chromosome breakage is one of the main causes of cell lethality, one would expect that tritium B-rays would be about 2.5 times as lethal per unit dose as X-rays."

This DEIS does not take into account plutonium that will be released to the environment from these plants. A study of mussels made at Plymouth, Massachusetts, where a nuclear plant is located, had indicated that plutonium is a part of the radioactive effleuent from a nuclear power plant. (Newsweek, December 11, 1978)

Bioaccumulation of Radioactivity

The fact of bioaccumulation of radioactivity in plant, water and animal life is not adequately addressed in the DEIS. Besides side stepping the issue in the report, it does not take into the effect of the overlapping environments of the chemical and radioactive pollutants from The Dow Chemical Company in the area.

Many references to bioaccumulation of radioactivity appear in the literature. Only a sampling can be provided here.

In a statement to the New York Times, a number of medical doctors associated with the Physicians for Social Responsibility have warned about what they call dangerous myths about nuclear power.

Myth 1 of the statement--"Nuclear plants in normal operation are not a radiation hazard," has the most significant bearing on the adequacy of this permit. Their statement includes the following comments:

> "Nuclear plants and their supporting facilities routinely release radioactive effluents into the air and water. These may contain elements that concentrate in the bones, muscles, thyroid and other organs. The magnitude of the health risk is inestimable since it may take time for the material to circulate through the food chain before human exposure reaches significant levels. Leukemias would not then appear for at least five more years; other cancers, 15 to 30 years, and latent genetic damage might only become manifest generations hence."

This statement underlines the fact that the effluents that will be routinely or accidentally released to the air and water can ultimately be incorporated in the food chain of man.

The DEIS does not take into consideration the somatic and genetic effects of not only the accumulation but the bioconcentration of the effluents that will be released to the water here through routine and the inevitable accidental releases during the expected lifetime of the plant.

Report of the Committee on Environment of the Saginaw County Medical Society, Dec., 1971

Early in the construction phase of these plants, a group of medical doctors from the Saginaw County Medical Society prepared a study on nuclear energy. In that study, they discussed among other things, the environmental concentration of radioactivity:

> "Every time radioactive waste is dumped into a stream, buried, dropped into the ocean, discharged into the air or otherwise released from human control, it passes into the complex world of living things. It will pass from living things to living things, sometimes being concentrated, at other times being dispersed, with an efficiency and ingenuity which man has not yet come to understand. At unpredictable times and places, this radioactive waste will reappear in man's food, air, and water. It will not go away for decades, or centuries, or even millennia."(p. 41)

It is important to note that as a consequence of their extensive study, the Saginaw Doctors' Committee concluded the Midland nuclear plants were not sited in the best interest of public health and safety.

Balancing Operational and Environmental Requirements

The DEIS indicates that the cooling pond will become the first waste disposal system for chemical wastes and laundry wastes which could contain radioactive materials from the nuclear plants. These wastes will be a part of the seepage to the nuclear plant site. The dewatering system will return them along with other contaminants from the reactor area back to the cooling pond according to the DEIS.

The DEIS also states that the water in the cooling pond will have to be maintained at a carefully controlled chemical content in order to use this water for cooling the reactors. It is not clear from the DEIS how the rigid requirements for the cooling pond water can be maintained as well as maintaining the limits of what goes into the Tittabawassee River as defined by the requested water permit.

Long Term Health Consequences

The health consequences of the radon-222 that will be released from mining and mill tailings of the uranium that will be needed for the Midland nuclear plants were evaluated. However, they were evaluated only for 1,000 years. However, these radon emissions are, in fact, governed by the 80,000 year half-life of the thorium and the 4.5 billion year half-life of the U-238 in the mill tailings and the amount of the material covering the tailings.

The NRC estimate of 2 deaths in the draft is more than 100,000 too low, according to the analysis of Dr. William Lochstet. (Comments, Midland DEIS, April, 1982) This is due largely to the arbitrary, immoral, incorrect procedure of stopping the calculations at the end of the first 1,000 years.

Radioactive Waste

The flat statement that there will be no releases to the environment from low level radioactive waste buried in land-fills is belied by actual experience. The low level radioactive waste buried at Maxey Flats, Kentucky, and Sheffield, Illinois, was found migrating off site less than a decade after the AEC had assured state officials that they would remain in place for centuries.

The arbitrary statement that all the high level and transuranic wastes from these plants will be buried with no radiological environmental impact, is an illusion and not supportable by any facts or past experience.

These comments on the DEIS of the Midland nuclear plants are prepared in behalf of the Great Lakes Energy Alliance, a coalition of citizens' groups in the State of Michigan who are concerned about unresolved issues in the current development of nuclear power and who are interested in the promise of alternative and renewable energy sources.

We hope these comments will be reflected in the Final Environmental Impact Statement.

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