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## Coalition for a Nuclear Free Great Lakes

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OFFICE OF SECRETARY  
DOCKETING  
BRANCH

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
Attention: Docketing and Service Branch

August 16, 1994

The Coalition for a Nuclear-Free Great Lakes (CNFGL) is submitting the following comments in the proposed plans for the storage of spent nuclear fuel at the site of the Davis Besse nuclear power plant (Comments on the 10 CFR part 72 proposed rule). CNFGL is a non-profit coalition of citizens groups from 8 states and 3 provinces concerned with safe energy. The coalition has members in the immediate area who are impacted by the decisions under consideration.

We request Public Hearings be held on the matter of Dry Cask Storage at Davis Besse. We request that an Environmental Impact Statement (EIS) be conducted. We request that the EIS include an Economic Impact Statement with a cost / benefit analysis to be conducted as well. We request non approval of generic rule making pertaining to the dry cask storage at Davis Besse based on the following concerns presented here. There are a multitude of concerns of a specific nature which we have not outlined here.

There are major population centers near Oak Harbor, Ohio that will be impacted immediately by an accident or rupture of dry storage casks at the Davis Besse site. These population centers include: Detroit, MI., Monroe, MI., Toledo, OH., Oak Harbor, OH., Port Clinton, OH., The Resort Islands including Put-N-Bay, Sandusky, OH., Cleveland, OH., Akron, OH., Findley, OH., Mansfield, OH., Windsor Ontario, Amherstburg Ontario, Leamington Ontario, London Ontario. The placement of the spent fuel from the containment or spent fuel pool at Davis Besse into an unproven and questionable technology warrants comprehensive public review. This material is lethal, and in a democracy the persons at risk must have a voice in the disposition of these lethal materials. We demand Public Hearings as prescribed by the Atomic Energy Act (AEA).

Lake Erie will flush into Lake Ontario and then flush into the St. Lawrence Seaway. This will take decades. When these waters are contaminated with radioactivity with the half lives associated with spent fuel the drinking water for millions of residents will be lost along with their economies. These stakes are too high to be considered an "acceptable risk". The hydrology and impact

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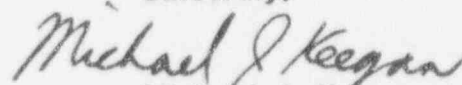
on the people of the Great Lakes must be examined, explored and take precedence over any financial gains which might be made or saved by private interests. We demand that an Environmental Impact Statement be conducted as prescribed by the National Environmental Policy Act (NEPA).

The economy of this region relies heavily on tourism and sports fishing. The land and the waters of the region are at high risk of irreparable damage due to the operation of nuclear power facilities. The deliberate placement of spent nuclear fuel into dry storage casks is a decision which must have full public input. This decision will impact the public of several states and provinces. The communities along the shores of Lakes Erie and Ontario, and the St. Lawrence Seaway rely heavily on tourism and sports fishing. A decision to place spent nuclear fuel near the shores of Lake Erie could certainly undermine these economies. We demand that a full Economic Impact Analysis be conducted as it pertains to the livelihood of millions of persons in the region.

The NRC commissioned a study from the Sandia Labs which was to provide an assessment of a worst case accident at each U.S. nuclear power plant. The 1982 study concluded that there would be billions of dollars (1980 dollars) of damage at Davis Besse, thousands of deaths due to cancer would occur. These figures were developed when the nuclear fuel from Davis Besse was within an "in-depth" containment. Storage of spent nuclear fuel near the shores of Lake Erie would be at considerably higher risk than an "in-depth" containment. The containment of the dry storage casks must be scrutinized in full view of the public. The economies of several states and provinces encompassing hundreds of communities would be placed in jeopardy. Two-thirds of the population from all of Quebec live along the St. Lawrence Seaway. These questions must be considered in the light of day, and the public has every right to be party to these discussions in a democracy.

For these aforementioned reasons the Coalition for a Nuclear-Free Great Lakes demands: public hearings; environmental impact statements; full cost / benefit analysis; certificate of need legislation; and economic impact statements.

Sincerely,



Michael J. Keegan  
Chairperson,  
Coalition for a  
Nuclear-Free Great Lakes