

March 7, 1984

COMMENTS OF JOHN F. DOHERTY TO BRAIDWOOD STATION DES (DECEMBER 1983)

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John F. Doherty, of 318 Summit Ave., Brighton, Mass. 02135, comments as below on the DES (NUREG-1026) for the Braidwood Station, Units 1 & 2, Docket Nos. STN 50-456,457

COMMENT DOHERTY 1

In Appendix C, at page C-6, the following statement is made:

"To illustrate: A single model 1000-MWe LWR operating at at an 80% capacity factor for 30 years would be predicted to induce between 3.3 and 5.7 cancer fatalities in 100 years, 5.7 and 17 in 500 years, and 36 and 60 in 1000 years as a result of releases of radon-222."

My concern is that the DES has not completely described the fuel cycle impact in Appendix C. The concern is not impact of the operation of the plant to the general public. Specifically, the DES should contain a statement of:

- a) The range of number of non-fatal cancer injuries induced by fuel cycle radon-222 for providing fuel for the Braidwood Station, Units 1 & 2, for its projected capacity factor (80%) and licensing period (40 years).
- b) The range of number of non-fatal birth defects induced by fuel cycle radon-222 for providing fuel for the Braidwood Station, Units 1 & 2, for its projected capacity factor (80%) and licensing period (40 years).

COMMENT DOHERTY 2

On Page 5-26 of the Statement, it says, "The lower limit of the range would be zero because there may be biological mechanisms that can repair damage caused by radiation at low dose and/or dose rates." (The discussion is of risk of deaths from cancer due to exposure to plant radioactive materials, etc.) This statement is

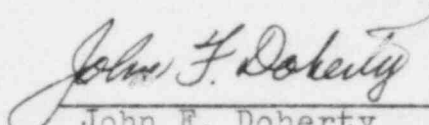
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unsupported by reference, or documentation, and this Commentor knows but one item doing this. The Statement should be altered to include what backs this position.

COMMENT DOHERTY 3

The Statement needs to clarify if in the analysis of environmental impacts of postulated accidents any credit was given for Applicant compliance with any of the TMI-related requirements of NUREG-737 "Clarification of TMI Action Plan Requirements".

Thank you for the opportunity to comment.



John F. Doherty