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Federal Register Notice 46 FR 11666  
SD Task No. EP 5177  
NUREG Report: 0586  
Contract No. \_\_\_\_\_

Subject: DG-612 on Decommissioning

THIS DOCUMENT CONTAINS  
POOR QUALITY PAGES

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March 8, 1981

NRC  
Washington D.C. 20555

Re Draft Decommissioning Report

Dear NRC staff:

I am pleased that the NRC has addressed the issue of decommissioning. I live near the shut-down Humboldt Bay Nuclear Power Plant. This plant appears to be the prime candidate for the country's first experiment in commercial reactor decommissioning, so I read your report with great interest.

I am pleased that you are recommending that decommissioning be built into new reactors, and advance concern be given to health and safety and economics before a utility receives a license. But this is the main weak point of the EIS. Overall, you are addressing facilities that have not been licensed and not fully looking into what to do with what we have. There are very few reactors that are still being built. And, none on order. The EIS glosses over this fact. It makes no concrete proposals about how to deal with plans for decommissioning that are made just prior to, or after facility shutdown.

First, being specific, I would like to address "returning the site to unrestricted access". This is supposedly based on "realistic" assessments, where occupancy is less than full time. Later in the EIS there is mention of building houses on former nuclear sites. This is inconsistent. People live in houses full time. There is no mention of specifics on how proper shielding could be done or if it has been done. As far as I can find out, no decommissioned reactor has yet been open to unrestricted access. The EIS only takes into consideration the human species. Since most reactors, including Humboldt, are not built in the middle of cities, you must also consider other species (cockroaches don't count). Humboldt is a salt marsh where many wild animals take refuge. What will these unshielded animals do?

It is mentioned, without explanation, that decommissioning will have a positive environmental impact. Well, I am sure you are talking about long-term environmental effects. I question that too, but short term effects are also important. Especially for the people who live near the facilities. There will be employment effects, land effects and economic effects. "A small amount of land" will be committed for waste storage, but effects that the "small amount of land" will have on surrounding communities, is not mentioned.

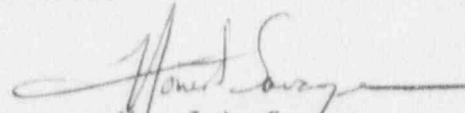
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It is stated on page 0-42 that cost-benefit considerations are not expected to have a major impact. That is contradicted in the entire argument over planned costs and funding of decommissioning--each rem will cost x amount to clean up. And the EIS talks of a certain cut off point implicit in ALARA where it is no longer cost effective to clean it up any further. This argument bothers me the most. For one, it appears that the ratepayer or taxpayer will pay and we deserve to have a "clean" environment, not one to 10mrem more than what was there before. So I'm an idealist, but it was expected when these things were built, that the land would be returned to the way it once was, not <sup>15</sup>5 or 10mrem more radiation.

I am happy to see concern over financial assurances. The options are well laid out. But, I missed any specific method in which the NRC plans to work with state PUCs on this issue. Will regulations requiring financial assurance automatically mean each state must immediately deal with it? This needs to be spelled out.

Under policy considerations the EIS addresses the technological capability in decommissioning. There is no mention of what we all know to be the human error factor. Maybe one doesn't address it in such a report. But it does exist, has TMI #2 has shown. There should be some way of dealing with it, since it is a real factor, instead of ignoring it.

Thank you for your attention to these matters.

  
Ms. J.A. Savage