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November 27, 1985

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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USNRC

'85 DEC -3 A10:17

Comments of Ohio Citizens for Responsible Energy ("OCRE") on
"Toledo Edison Co. and Cleveland Electric Illuminating Co.
Environmental Assessment and Finding of No Significant Impact"
50 Fed. Reg. 41265 (October 9, 1985)

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By the above-referenced notice, the NRC indicates that it has approved the request by Toledo Edison and CEI, the Davis-Besse licensees, to dispose of low-level radioactive wastes on the Davis-Besse plant site. Their request was submitted pursuant to 10 CFR 20.302. This sets an unfortunate precedent, as no doubt licensees will now seek approval to establish low-level waste dumps at reactor sites rather than incurring the cost of shipping the wastes off-site to a properly licensed disposal facility.

The NRC has essentially approved a low-level waste disposal site which would never meet the requirements of 10 CFR 61. 10 CFR 61.50(a)(5) requires that the disposal site be well drained and free of areas of flooding or frequent ponding, and that waste disposal shall not take place in a 100-year floodplain or wetland. A photograph of the Davis-Besse facility in the August 1985 Nuclear News showed large areas of standing water on the site.

The NRC should not make it so easy for reactor licensees to evade the standards which have been promulgated to protect the public.

The NRC's environmental assessment failed to consider the drinking water-aquatic foods pathway. The Davis-Besse site is adjacent to Lake Erie; undoubtedly some of the radioactivity will be washed out into Lake Erie. Bioaccumulation of the highly dangerous cesium, cobalt, and manganese isotopes in fish or waterfowl has been totally neglected.

OCRE urges the NRC to rescind approval of the request and require TE and CEI to ship their radioactive wastes to a properly licensed facility meeting the standards of 10 CFR 61.

Sincerely,

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