



Nuclear Energy Information Service

Illinois' Nuclear Power Watchdog for 26 years

Office and Mail: 3411 W. Diversey Avenue, #16, Chicago, IL 60647-1245
(773)342-7650; -7655 fax www.neis.org neis@neis.org

March 6, 2008

STATEMENT CONCERNING EXELON PLANS FOR EARLY DECOMMISSIONING OF ZION STATION

NEIS has become aware of this Thursday's presentation meeting sponsored by Exelon Corporation concerning the proposal for an early site decommissioning of the Zion nuclear facility. While NEIS hopes to be able to have a representative at this meeting, we wish to share in advance with you some important preparatory documents which we hope will assist you in understanding some of the ramifications of the Exelon proposal. These are attached.

NEIS has been following the high-level radioactive waste disposal issue since 1982 (that's right -- for 26 years), as well as the conditions at the Zion facility, and the reactor decommissioning issues. We would like to share these brief points in advance of the meeting:

- NEIS has serious questions about the advisability of the early site decommissioning. Some are environmental; some financial; and some radiological. We believe that until certain important questions are answered, the best thing to do is to continue the originally proposed Safe-Stor plan for the site; and implementing the use of "hardened-on-site-storage" for the high-level radioactive wastes (HLRW) remaining at the Zion Station.
- The environmental community has worked for years to develop an environmentally responsible method for the interim storage of high-level radioactive wastes. This method goes by the acronym of HOSS -- "hardened on-site storage." We attach two summary papers on the HOSS method. HOSS acknowledges that whatever methods are chosen in the short-term, they will by necessity be lesser-of-evil choices. HOSS strives to minimize the possibility of large-scale release of radiation due to accidental or terror-induced accidents involving stored high-level radioactive wastes. It incorporates the industry advocated method of "dry-cask" storage of wastes, but using a qualitatively superior method and system. It is NOT "business as usual" use of dry-cask storage. See the papers for details. We would point out that the Nuclear Regulatory Commission has largely ignored this superior pro-active proposal.
- It is critical to determine that a.) the decommissioning fund is adequate to fund the contract that Exelon proposes between itself and Energy-Solutions so that b.) Illinois ratepayers and taxpayers are not saddled with additional costs other than the money they have already paid into the decommissioning fund. Any other arrangement involving additional ratepayer or taxpayer assessments would be grossly unfair; and amount to a subsidization of Exelon's future profits gained from the eventual sale/use of the land on the site beginning in 2018 (according to their proposed timeline).
- Be advised that a.) NRC regulations call for decommissioning of the site so that the land will be available for "unrestricted use." That means -- children's playgrounds; schools; parks; hospitals. With no further monitoring required. Therefore, b.) it is of critical importance to agree in advance to the proper LEVELS of radiation measured at the site at the time the decommissioning is complete. In other words -- determine in advance "how clean is clean" for the site once decommissioning is complete. The environmental community has long argued that all sites should be restored to original background radiation levels at a minimum. It has traditionally opposed set arbitrary levels proposed and established by NRC and the nuclear industry. This is particularly important given the findings of the BEIR-VII Report by the National Academy of Sciences in June 2005 -- essentially validating the claim that is no "safe" dose of radiation; and that all exposures are cumulative. And we would add that women, children, seniors and immune-deficient individuals are populations far more sensitive to radiation exposure than the NRC's "reference man" (quite literally a male, 5'-7", 165 pounds, of North European gene stock) that is currently used to set exposure standards -- like those at decommissioning for un-restricted use of the land. This point needs to be thoroughly debated before allowing the decommissioning to proceed.

We look forward to seeing you again; and working together to safe-guard the local communities affected by Exelon's decision, and the drinking water supply for 16 million people.

Thank you in advance for your consideration of these views. Stay well, do great things.

David A. Kraft, Director