

# Pacific Seabird Group



DEDICATED TO THE STUDY AND CONSERVATION OF PACIFIC SEABIRDS AND THEIR ENVIRONMENT

1 May 1983

Captain Edward F. Wagner,  
U.S. Navy, Office of the Chief of Naval Operations  
Department of the Navy  
Washington, DC 20350

Dear Captain Wagner,

These remarks are comments on the DEIS for the disposal of decommissioned, defueled naval submarine reactor plants. We understand that the comment period has been extended to June 30, 1983.

We have two concerns regarding this proposed action. First, we do not believe that sufficient attention is paid to the possibility of biological creatures transporting radionuclides to surface waters. My recent research with the diets of Laysan and black-footed albatrosses indicate that they eat many mysids (Gnathophausia gigas and G. ingens), isopods (Anuropus branchiatus), leptostracans (Nebaliopsis typica), shrimps (Notostomus japonicus), and amphipods (Eurythenes gryllus) that are known to inhabit very deep waters. Albatrosses feed only at the surface of the ocean, and consequently creatures from very deep water migrate to the surface. The amphipod Eurythenes gryllus was recently found in baited traps at 4700 meters at the Nuclear Energy Agency dumpsite in the North Atlantic. We are very concerned that seabirds and other organisms might come into contact with marine organisms that picked up radionuclides from deep water and returned them to surface waters.

Second, we firmly believe that the comparison of disposal costs (S-16 and elsewhere) is seriously biased. The costs of disposal of a nuclear submarine must be viewed in the context of its entire cost and operation. We believe that the costs in Table 3 should

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be revised to reflect the costs of building, operating, and maintaining a submarine for its entire useful life, using constant dollars. For example, if the 20-year life of a submarine cost \$1,000 million, the second line on Table 3 (S-16) might read:

\$1013.3 million

\$1007.2 million

\$1005.2 million.

Disposal is simply the last phase of the life of a submarine. To view disposal apart from the huge cost of building and maintaining a submarine in the first place distorts the costs of the various disposal options. It does not serve the public interest to assert with selective data that the costs of land burial are much greater than sea burial. The fact of the matter is that the costs of either are trivial compared to the costs of the submarine.

Sincerely,

*Craig S. Harrison*

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