

Lewis Sumner
Vice President
Hatch Project Support

**Southern Nuclear
Operating Company, Inc.**
40 Inverness Parkway
Post Office Box 1295
Birmingham, Alabama 35201
Tel 205.992.7279
Fax 205.992.0341

65 FR 67418
11/9/00
9

RECEIVED

NOV 23 AM 3:02

Director of Directives



HL-6034

January 23, 2001

Docket Nos. 50-321
50-366

Chief
Rules Review and Directives Branch
Division of Administration Services
Mailstop T 6 D59
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Edwin I. Hatch Nuclear Plant
Comments on Draft NUREG-1437, Generic Environmental Impact Statement
for License Renewal of Nuclear Plants, Supplement 4
(65 Federal Register 67418 dated November 9, 2000)

Ladies and Gentlemen:

Southern Nuclear Operating Company (SNC) has reviewed the draft NUREG-1437, Supplement 4, for Edwin I. Hatch Nuclear Plant, Unit 1 and 2, published in 65 Federal Register page 67418, dated November 9, 2000. SNC is providing the enclosed comments as requested.

If you have any questions regarding these comments, please contact this office.

Respectfully submitted,

H. L. Sumner, Jr.

HLS/JTD

Enclosure: SNC Comments on Draft SEIS for HNP

Template = ADM-013

E-RISS = ADM-03
Call = A. Kugler (ASK1)
A. BERANEK (AFB)

cc: Southern Nuclear Operating Company
Mr. P. H. Wells, Nuclear Plant General Manager
Mr. C. R. Pierce, License Renewal Services Manager
SNC Document Management (R-Type A02.001)

U. S. Nuclear Regulatory Commission, Washington, D.C.
Mr. C. I. Grimes, Branch Chief, License Renewal and Standardization Branch
Mr. L. N. Olshan, Project Manager - Hatch
Mr. W. F. Burton, Project Manager - Hatch License Renewal
Ms. Brenda J. Shelton, Chief, Information and Records Management Branch

U. S. Nuclear Regulatory Commission, Region II
Mr. L. A. Reyes, Regional Administrator
Mr. J. T. Munday, Senior Resident Inspector – Hatch

SNC Comments on Draft SEIS for HNP

General Comments

1. Emphasis on Archeological/Historic Resources

There appears to be an overstated emphasis throughout the SEIS on the significance and potential of impacts to historic/archeological resources on the HNP site. This is most pronounced in Chapter 2, but is also evident in other chapters. The level of detail in the Section 2.2.9 discussion of historical/archeological resources seems out of proportion considering the historic/archeological impacts section in Chapter 4 which states “Consultation between the license renewal applicant and the Georgia State Historic Preservation Office resulted in a determination by the State office that no known historic properties included in or eligible for inclusion in the National Register of Historic Places would be affected by the proposed action.” The section also concludes that impacts to these resources from license renewal would be “SMALL.”

The CEQ regulations ("Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act") provide the following guidance on environmental impacts:

- “Environmental impact statements shall be analytic rather than encyclopedic... There shall be only brief discussion of other than significant issues.” (40 CFR 1500.2)
- “The environmental impact statement shall succinctly describe the environment... to be affected by the alternatives. The descriptions shall be no longer than is necessary to understand the effects of the alternatives. Data and analyses... shall be commensurate with the importance of the impact...” (40 CFR 1502.15)

The sheer weight of the information begins to confer significance on impacts that have been determined to be “SMALL”. Chapter 4 (p. 4-26) of the SEIS states that license renewal is unlikely to jeopardize cultural resources and may, in fact, “...have a beneficial effect...”

It is recommended that Section 2.2.9 (Historic/Archeological Resources) be shortened and made more concise.

2. Scope of Chapter 8

Chapter 8 currently discusses potential impacts of “dramatic” post-decommissioning land-use changes, especially those associated with “eventual sale or transfer of the land” (p. 8-3). Based on the speculation that these dramatic land-use changes are a given (or at least a reasonably foreseeable possibility), Chapter 8 goes on to suggest that impacts to unidentified historic/archeological resources could be “SMALL to LARGE.” In fact, it is difficult to predict future use of the unrestricted property, however any post decommissioning land-use would be subject to applicable environmental and resource laws. SNC recommends that the discussion of speculative “dramatic” potential impacts be avoided in Chapter 8. SNC recommends revising the conclusions in table 8-1 for Historic and Archeological Resources to “SMALL” with a revision to the comment.

Specific Comments

The following matrix contains specific comments and their proposed resolutions. Text recommended for deletion is shown as lined out (i.e., ~~deleted text~~). Recommended new text is shown as underlined (i.e., new text). Most comments are primarily editorial while some are more substantive.

Page/line #	Comment	Proposed resolution
Page 1-9, Table 1-1, Lines 7,9,12,14,16	Some permits include "state" in the requirement column description. To clarify that the permits are state and not federal, SNC recommends adding the word "state" to the items described. Also add the identified words for clarification.	Requirement Column: <u>State</u> air quality <u>State drinking</u> water quality <u>State</u> storm water discharge <u>State NPDES</u> discharge permit <u>State</u> solid waste landfill
Page 2-4, Figure 2-3	HNP revised permit and added two wells for irrigation of ornamental plants after ER was written. This change in the application was communicated to the staff by letter dated December 15, 2000.	See the revised Figure 2-3 attached which identifies the location of wells 4 and 5.
Page 2-11, Lines 32 and 34	SNC recommends clarification of description of mixed waste and hazardous waste.	HNP also provides for <u>accumulation and temporary onsite storage</u> of mixed wastes, which contain both radioactive and chemically hazardous waste. Storage of radioactive material is regulated by the NRC under the Atomic Energy Act of 1954 (AEA), and <u>accumulation and temporary storage</u> of hazardous wastes is regulated by the U.S. Environmental Protection Agency (EPA) under the Resource Conservation and Recovery Act of 1976 (RCRA).
Page 2-12, Line 1	A copy of the ODCM is only included if the ODCM was revised during the year.	includes the ODCM as an appendix if it is revised <u>during the year covered by the report</u> (Southern Company 2000a).
Page 2-14, Line 1	From review of preceding text and review of plant drawings, the offgas recombiner building should be included in this description.	The major system components are located in the turbine building, <u>offgas recombiner building</u> , and in the waste gas treatment building.
Page 2-14, Lines 34-36	Per our review of HNP FSAR and year 2000 49 CFR, it appears that 171 through 185 would apply to HNP.	Solid waste is packaged in containers to meet the U.S. Department of Transportation requirements in 49 CFR Parts 171 through 177 <u>185</u> . Disposal and transportation are performed in accordance with the applicable requirements of 10 CFR Part 61, and Part 71 , and 49 CFR Parts 171 –185 <u>respectively</u> .

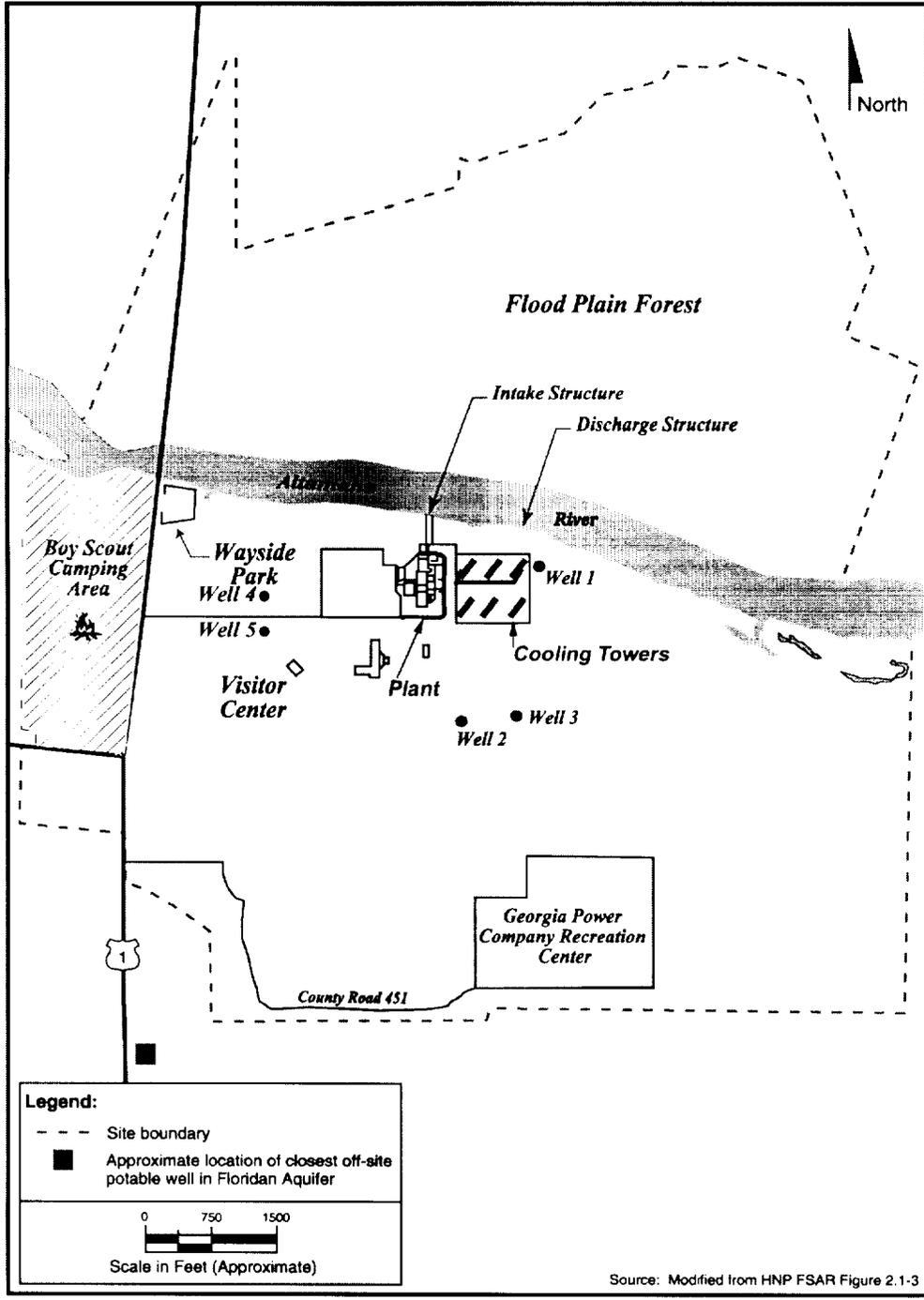
Page/line #	Comment	Proposed resolution
Page 2-15, Line 1	Please add text to clarify that number is for disposed waste.	From year to year, the volume of radioactive contaminated waste generated will vary. The average value of <u>disposed waste</u> at HNP over the past 5 years is about 320 m ³ (11,300 ft ³).
Page 2-20, Line 6	Permit has been revised since application to allow a change in monthly average. This change in the application was communicated to the staff by letter dated December 15, 2000.	SNC is permitted (Georgia Department of Natural Resources [GADNR] Permit 001-0690-01) to withdraw a monthly average of up to 273,000 m³/d (72 million gpd) 322,292 m ³ /d (85 million gpd) with a maximum 24-hour rate of up to 392,000 m ³ /d (104 million gpd). As a condition of this permit, SNC is required to monitor and report withdrawals.
Page 2-20, Line 31	HNP revised permit and added two wells for irrigation of ornamental plants after ER was written. This change in the application was communicated to the staff by letter dated December 15, 2000.	Although the current permit indicates four six onsite wells, there are actually only three wells providing groundwater for domestic and process use. <u>Wells four and five provide water for irrigation of ornamental vegetation.</u> The fourth sixth well was intended to provide make-up water for a wildlife habitat pond that was not completed; therefore, the well has not been installed.
Page 2-21, Line 4	HNP revised permit and added two wells for irrigation of ornamental plants after ER was written. This change in the application was communicated to the staff by letter dated December 15, 2000.	Change “three” to “five”
Page 2-21, Line 37	SEIS states that HNP is located in western Georgia. Various other references to HNP location state south central Georgia.	Change “western” to “south-central”.
Page 2-28, Line 15	Drinking water samples are not included in the REMP	shoreline sediment and water samples from the Altamaha River, and drinking water samples ,

Page/line #	Comment	Proposed resolution
Page 2-28, Line 30	For clarification between ODCM results and REMP make the following changes.	<p>Southern Company reported the following estimated whole body doses to the most limiting member of the public for 1999:</p> <ul style="list-style-type: none"> • approximately 0.00064 mSv/yr (0.064 mrem/yr), based on vegetation, fish, and sediment results from the HNP environmental monitoring program (Southern Company 2000b) • approximately 0.00074 mSv/yr (0.074 mrem/yr) based on gaseous and liquid effluent releases (Southern Company 2000a). <p><u>For 1999, dose estimates were also calculated based on radioactivity detected in the environment and attributed to plant operations as part of the REMP.</u></p> <p><u>Southern Company reported the following potential whole body doses to the most limiting member of the public for 1999:</u></p> <ul style="list-style-type: none"> • <u>approximately 0.00046mSv/yr (0.046 mrem/yr) based on vegetation, 0.00013 mSv (0.013 mrem/yr) based on fish, and 0.000049 mSv/yr (0.0049 mrem/yr) based on sediment (Southern Company 2000b).</u>
Page 2-33, Line 21	States that the US 1 widening project is expected to be “undertaken” within 5 years. However, the reference document states that this project is anticipated to “begin” within 5 years. “Undertaken” implies that it will be completed in that time frame.	Change the wording “expected” to “anticipated” and “undertaken” to “begin”.

Page/line #	Comment	Proposed resolution
Page 2-38, Line 21	In Table 2-13 the last number in the 30-40 Miles column is incorrect.	Change this number from 82,270 to 87,270.
Page 2-42, Line 24	The text refers to one “historical site” known to exist on the HNP site, the Bell Cemetery. While the phrase “historical site” is not defined, its use within the section entitled “Historic and Archaeological Resources at HNP” can suggest an unintended meaning. This is because related regulations define “site” as a location of a significant event, activity, or structure [36 CFR 60.3(l)] and “historic property” as something included in, or eligible for inclusion in, the National Register [36 CFR 800.2(e)]. NRC does not seem to suggest that the Bell Cemetery has historical significance and, in fact, cemeteries or even graves of historical figures ordinarily are not considered eligible for inclusion in the National Register (36 CFR 60.4). As communicated in SNC letter, dated August 11, 2000, Plant Hatch is required by “Georgia Power’s Human Remains Policy” to protect any known or discovered cemeteries or burial grounds whether it is a historical site or not.	Only one unrecorded historical site is known to exist on the HNP. This is The Bell Cemetery that is indicated...
Page 4-26, Line 25.	See comment for Page 2-42, Line 24	Delete the word “historic”

Page/line #	Comment	Proposed resolution
Page 4-26, Lines 32-35	The text seems to suggest that SNC would have to perform a formal study to determine the likelihood of cultural resources being present before, for example, logging. A requirement for performing cultural resource evaluations has not been required of previous license renewal applicants. For HNP and the previous plants, NRC indicated that studies in the area found cultural resources and NRC imposed on the applicants only the standard of care. There is no apparent basis for treating HNP differently and the discussion on an evaluation should be deleted.	Such activities may include not only operation of the plant itself but also land management-related actions such as ground disturbance. Since the plant site has not been subjected to an intensive cultural resources field survey to identify and record all cultural resources, any landscape modification or ground disturbance of previously undisturbed areas should be preceded by a cultural resource evaluation to fulfill obligations under the National Historic Preservation Act of 1966 and implementing regulations.
Page 4-31, Line 16, 18	HNP revised permit and added two wells for irrigation of ornamental plants after ER was written. This change in the application was communicated to the staff by letter dated December 15, 2000.	Change “yield” to “use” Add to end of paragraph: Two smaller wells for irrigation of ornamental vegetation were placed in service in early 2000. Those wells typically draw 9000 GPD each and are used as needed.
Page 4-32, Line 10	HNP revised permit and added two wells for irrigation of ornamental plants after ER was written. This change in the application was communicated to the staff by letter dated December 15, 2000.	Add to end of paragraph: Irrigation wells four and five are also located in the Floridan Aquifer. A sixth well has been permitted in the Miocene Aquifer but has not been constructed.
Page 4-34, Line 33	Clarify text to edit description of shortnose sturgeon. As written the text could imply differences from other shortnose sturgeon	Thus, an additional 20 years of operation of HNP should not affect the viability of the Altamaha River shortnose sturgeon or result in any population decline.

Page/line #	Comment	Proposed resolution
Page 4-32, Line 35	<p>Section 7(2) of the Endangered Species Act reads as follows: "Each Federal agency shall, in consultation with and with the assistance of the Secretary {of Interior}, insure that any action authorized, funded, or carried out by such agency...is not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or modification of habitat of such species...which is determined..to be critical, unless such agency has been granted an exemption for such action. In fulfilling the requirements of this paragraph each agency shall use the best scientific and commercial data available." Both the NRC and SNC biological assessments for the shortnose sturgeon are based on the "best scientific and commercial data available" and indicate that the impact would be small. The conclusion at the end implies that this is potentially an open item. SNC recommends that preliminary be deleted.</p>	<p>Based on the <u>results of the NRC</u> biological assessment, it is the staff's preliminary conclusion that the impact to the shortnose sturgeon is SMALL and that mitigation is not needed.</p>
Page 6-2, Lines 16, 17, 19, and 20	<p>Table 6-1 appears to contain an incomplete listing of GEIS Sections.</p>	<p>Add Section 6.6 to the GEIS Sections column in Table 6-1.</p>
Page 8-3, Line 34	<p>There are currently no known or identified Historic and Archaeological resources on the Plant Hatch site. Text implies that there are currently "known" resources and implies that the Visitors Center is one of them. These resources should be included in the socioeconomic paragraph and not under a heading titled "Historic and Archeological Resources. SNC also recommends revising conclusion as stated in the General Comments section.</p>	<p><u>Historic and Archaeological Resources:</u> The potential for future adverse impacts to known or unrecorded <u>cultural historic and archeological resources</u> at the HNP site following decommissioning will depend on the future use of the site land. Known resources and activities include the current Visitors Center and associated interpretative efforts that are funded and maintained by SNC. Eventual sale or transfer of the land within the plant site could result in adverse impacts on these resources should the land-use pattern change dramatically.</p>



Source: Modified from HNP FSAR Figure 2.1-3

Figure 2-3. Hatch Nuclear Plant Property Plan