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5000 Dominion Boulevard, Glen Allen, VA 23060



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Chief, Rules Review and Directives Branch  
Mail Stop: T-6 D59  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

GL02-002

**COMMENTS ON THE DRAFT DOCUMENT "ENVIRONMENTAL  
REVIEW GUIDANCE FOR LICENSING ACTIONS ASSOCIATED  
WITH NMSS PROGRAMS" (NUREG-1748)**

Dear Sirs:

Virginia Electric and Power Company (Dominion) and Dominion Nuclear Connecticut appreciate the opportunity to provide the attached comments on draft NUREG 1748 as requested in the Federal Register, volume 66, number 202, page 52951 on October 18, 2001.

If you have any questions regarding our comments, please contact

Mr. Tony Banks                      tony\_banks@dom.com or (804) 273-2170, or,

Mr. Don Olson                      don\_olson@dom.com or (804) 273-2830

Respectfully,

Stephen P. Sawyer, Director  
Nuclear Licensing and Operations Support

Attachment

*Template = ADM-013*

*E-RIDS = ADM-03*

*add = M. Blevins (MXBL)  
Melanie Wong (MCW)  
H. Beranek (AFB)*

**Attachment**  
**Dominion Comments on the Draft NUREG 1748**

**Section 1.2 The Environmental Review, and Section 5.4 Environmental Impacts**

Page 4, Lines 11-15, and Page 66, Lines 24-25:

**Draft NUREG Statement:**

*"The NEPA document does not address accident scenarios, rather it addresses the environmental impacts which result from the accident"; and, "... the NRC should ensure consistency between the NEPA document and the SER."*

*"These impacts should consider normal operational events as well as reasonably foreseeable accidents (e.g. design basis event for Part 72 licensees ...)..."*

**Dominion Comment:**

NUREG-1437 and NUREG-1555 both provide for review of design-basis accidents and severe accidents from an applicant's ER or FSAR, and review of SAMA analyses from an applicant's ER. Although this NUREG-1748 guidance document states environmental impacts from accidents are addressed, it is not seen in the Contents or directed in the text, specifically. The purpose for mentioning design-basis events above is not clear. It is suggested therefore, that either accident and/or mitigation analyses discussion be included or directed specifically for consistency of applicant expectations with other NRC environmental documents, or additional explanation be provided for disposition of accident analyses.

**Section 1.3 Utilizing Existing Environmental Analyses**

Page 6, Line 10:

**Draft GEIS Statement:**

*It is stated that "Existing environmental analyses should be used to evaluate impacts associated with a proposed action to the extent possible and appropriate."*

**Dominion Comment:**

It is not stated that reviewers should identify and evaluate the quality assurance measures taken by the applicant in collecting and analyzing data. This is provided as an instruction to reviewers in NUREG-1555. It is suggested that

inclusion of this type of instruction would serve to build public confidence in NRC processes and applicant credibility.

### **Section 1.3.1 Tiering**

Page 6, Lines 23-25 and 30-32:

#### **Draft NUREG Statement:**

*The new, more specific environmental document incorporates by reference the general discussions and analyses from the existing document and concentrates on the issues and impacts of the project which are not specifically covered in the broader document.*

*An example of tiering may include using a GEIS as the basis for an EA or EIS prepared for a site-specific proposed action.*

#### **Dominion Comment:**

It is suggested that a brief discussion of NUREG-1437 content applicability and usefulness be included in this paragraph. It would serve to further strengthen and clarify the explanation of adopting generic issue findings, particularly as the process applies to spent fuel storage license renewal actions.

### **Section 1.4 References**

Page 8, Lines 15-16 and 21-23:

#### **Draft NUREG Statement:**

*10 CFR 51 is referenced for Environmental Regulations and NUREG-1496 is provided as a GEIS reference.*

#### **Dominion Comment:**

It is suggested that NUREG-1437 and Supplement 1 to RG 4.2 be added to the list of references, to provide reviewers and applicants additional reference guidance regarding license renewal actions.

### **Sections 5.3 and 6.3 Description of the Affected Environment, and Sections 5.4 and 6.4 Environmental Impacts**

Pages 59-65, 66-75, 93-105, and 107-113:

**Draft NUREG Statement:**

*This guidance document states that descriptions and impacts should be considered for the following resources, among others:*

- *Land use*
- *Ecology*
- *Air quality*
- *Noise*
- *Historical and cultural*
- *Visual/scenic*

**Dominion Comment:**

For existing licensed facilities, the above-listed resource areas with low-impact (or no-changes) should be deleted from evaluation for license renewal and continued operation.