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Rules and Directives
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REPLY TO THE ATTENTION OF:
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69FR 5880

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B-19J

Chief, Rules Review and Directives Branch
U.S. Nuclear Regulatory Commission
Mail Stop T-6D 59
Washington, D.C. 20555-0001

Re: Scoping Comments for the Proposed Operating License Renewal of the D.C. Cook Nuclear Plant, Units 1 and 2, Berrien County, Michigan

Dear Sir or Madam:

On March 8 and 9, 2004, the U.S. Environmental Protection Agency (U.S. EPA) attended a scoping meeting and site audit held by the U.S. Nuclear Regulatory Commission (U.S. NRC) for the proposed operating license renewal of the D.C. Cook Nuclear Plant (D.C. Cook), Units 1 and 2, in Berrien County, Michigan. D.C. Cook's current operating licenses for Units 1 and 2 expire on October 25, 2014 and December 23, 2017, respectively. U.S. NRC held the scoping meeting and site audit to engage interested parties prior to its preparation of a draft supplemental environmental impact statement (SEIS) for the license renewal. In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, we are responding with comments.

U.S. EPA recommends that the draft SEIS be developed with consideration for the following points:

1. The draft SEIS should include adequate information about radiological impacts. During the March 9, 2004 site audit, American Electric Power, the applicant for the operating licenses, provided information from its radiological environmental monitoring program (REMP) for D.C. Cook. As we understand it, the REMP is used to monitor and document radiological impacts to workers, the public, and the environment. Summary information about radiation emissions and emission pathways from D.C. Cook is relevant in determining radiological impacts from the plant's continued operation. Therefore, we suggest that the draft SEIS include current annual summary radiological impact information from the REMP.
2. We are concerned about the amount of organisms pinned against or drawn into D.C. Cook's cooling water systems. Under a final rule signed by U.S. EPA on February 16, 2004, certain power plants with cooling water systems are required to (1) reduce the number of organisms pinned against water intake screens by 80 to 95 percent, and (2) reduce the number of

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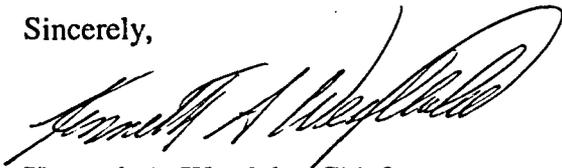
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organisms which are sucked into the cooling water system by 60 to 90 percent. The draft SEIS should indicate the applicability of the final rule to D.C. Cook, and the modifications planned by the applicant to comply with the rule.

3. The SEIS should discuss any planned power uprates at D.C. Cook, and the estimated resulting increases in radiological emissions, spent fuel, and other emissions. Although U.S. NRC's regulations (10 C.F.R. §. 51.53(c)(2)) state that an applicant's environmental report need not discuss the demand for power, we think that planned power uprates are reasonably foreseeable actions that contribute to a cumulative radiological impact, under 40 C.F.R. § 1508.7, and therefore should be discussed in U.S. NRC's SEIS.

Thank you for the opportunity to provide scoping comments. We look forward to reviewing the SEIS. If you have any questions, please call Newton Ellens of my staff at 312-353-5562.

Sincerely,



Kenneth A. Westlake, Chief
Environmental Planning and Evaluation Branch
Office of Strategic Environmental Analysis