

From: Richard Emch
To: Rich Gallagher
Date: 4/26/04 12:48PM
Subject: Fwd: Data request and DNC response

Rich,

Attached are the lab team's responses to your questions/comments on the list of onsite data needs as we discussed earlier today. If you have any further questions, please call me.

Rich Emch

CC: JXD10; Leslie Fields

From: "Ted B. Doerr" <tdoerr@lanl.gov>
To: "Richard Emch" <RLE@nrc.gov>, <LCF@nrc.gov>
Date: 4/22/04 6:35PM
Subject: Data request and DNC response

Rich and Leslie - Since time is getting short, below is a preliminary listing of responses to the DNC comments on the request for information. I would like to talk over the water/aquatic ecology elements with you. Via this email I am reconfirming with the SMEs that the responses characterize the information they have provided to me. Regards Ted

Land Use/Socioeconomics - STATUS: No changes or comments made by DNC

Terrestrial ecology - STATUS: Four comments made by DNC. We acknowledge they they have no additional information and do not have the state reports. **ACTION:** Sam Loftin has lead and will work with Ted and NRC before calling state agency for information request; also will continue to review open literature.

Health and Rad Waste - STATUS: One clarification requested by DNC. We need the following information to address the following condition per 10CFR50.53(3)(ii)(G), "If the applicant's plant uses a cooling pond, lake, or canal or discharges into a river having an annual average flow rate of less than 3.15x10¹² ft³/year (9x10¹⁰m³/year), an assessment of the impact of the proposed action on public health from thermophilic organisms in the affected water must be provided."

Data was being requested to determine the following

- 1) Confirmation that all the liquid discharges from the site are directed to each unit's discharge tunnel. Please note any exceptions.
- 2) Average daily flow rate into the quarry or annual flow rate
- 3) Maximum and average discharge temperatures and maximum and average temperatures in Long Island Sound outside the 8,000-foot-radius mixing zone.
- 4) Uses of chemical additives to the intake water
- 5) Data on any studies on thermophilic organisms (such as *Naegleria fowleri*, a pathogenic amoeba) in Long Island Sound.

Cultural Resources - STATUS: No changes or comments made by DNC

Water Resources - STATUS: One comment made by DNC. We now have the Final SAR and the information is sufficient. Planned discussions with DNC staff at the site audit should be sufficient.

Aquatic Resources - STATUS: One comment made by DNC requesting clarification of the 316b report request.

There are several issues (perceived or real) surrounding the NPDES permit approval, fisheries, and past practices. Examples of the issues from SMEs initial reviews include:

- * activist web sites contends Northeastern pleaded guilty to felony violations of their NPDES permit associated with illegal discharges of hydrazine. - Likely from the 1970's)
- * have been accused of discharging unacceptable levels of radionuclides, and chemicals associated with cooling operations (biocides, hydrazine, etc).
- * Shutdown of Millstone 2 and 3 for 3-4 years (which appear to be security and safety related based on the NRC database)

* NPDES permit approval has not been forthcoming for several years. The consensus among the contract team members (Jeff, Lisa, Bruce, and me) is that it likely warrants a detailed review of the NPDES discharge history and associated bioaccumulative concerns. We also want to confirm (with NRC) that the extended shutdowns (1996 to 1998/99) were related to safety and security not related to water discharge or other environmental issues. We request:

1. entire NPDES permit
2. NPDES discharge history and discharge characterization data (the ER only has general summary statements about temperature and chlorine)
3. Information on the regulatory violation details related to the NPDES permit.
4. We also would like to see if available in-house or external reports on potential bioaccumulative effects of chemicals and radionuclides associated with the nearshore if available (akin to Calvert Cliffs information that was readily available; such as monitoring data on their effluent (cooling water), and studies of tissue contaminants associated with biological resources for metals, organics, and radionuclides.

Current practices under Dominion may be outstanding, but unfortunately, the results of past practices associated with Northeastern may make this a larger issue under NEPA and the public interest element. We think an understanding of the environmental history is important. This interest in understanding the history was raised at the Scouting trip discussion.

Air Resources - STATUS: Two comments were made by DNC. We acknowledge we now have the FSAR and are evaluating the information. We also acknowledge DNC's statement that there are no current NOV's; and we would like to review the LPDES permit.