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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

April 11, 2005

1272

Mr. Jack Cushing
OWFN 11 F-1
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Mr. Cushing:

Enclosed are additional comments on the above Draft Environmental Impact Statement for an Early Site Permit (ESP) at the North Anna ESP Site – NUREG-1811 (North Anna ESP project). CEQ # 040569.

EPA is grateful to the NRC for there consideration of additional comments after the close of the comment period.

If you any questions regarding these comments please feel free to contact Kevin Magerr at (215) 814-5724.

Sincerely,

William Arguto,
NEPA Team Leader

Attachments: Comments

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Add J Cushing (JXC9)
A. Williamson (ARW1)

Comments to Draft Environmental Impact Statement for an Early Site Permit (ESP) at the North Anna ESP Site

1. The document is too broad in its consideration of potential plant designs. The document intends to allow for the citing of 7 potential designs for nuclear units. While adequate design information exists for a few of the designs, by the admission of the NRC (see Chap 3, Page 3-4, Line 31 and 32, Lines 39 and 40, Lines 40 and 41) there is inadequate design information available for some of the proposed units from which to make accurate environmental assessments of the impacts. The document should limit its scope to those nuclear plant designs for which reasonable data existed for assessing environmental impacts. If the NRC continues to consider those reactor units as viable it should develop a supplemental EIS or an additional EIS when environmental information becomes available. Based on a review of the DEIS, the document should be limited to the following units: ACR-700, Advanced Boiling Water Reactor, Advanced Pressurized Water Reactor (Surrogate AP1000), and the Economic Simplified Boiling Water Reactor.
2. Chapter 1, Pg 1-2 line 13 - The document states that a detailed design of the reactor or reactors is not needed at this time. However, there should be enough design information or data available on any reactor design to accurately bound the environmental impact. For several of the desired plant designs, this information is either not available or not provided as part of the DEIS in order to substantiate Plant Parameter Envelope information.
3. Chapter 3, Pg 3-3, Paragraph - The approach to develop a plant parameter envelope, while valid, is much more useful for developing a generic environmental impact statement. The approach proves less useful when referring to a specific action at a site. This approach is less credible when used to encompass reactor designs for which no accurate design parameters exist (the gas cooled reactors, and the IRIS next generation pressurized water reactors).
4. Chapter 3, Section 3.2.1.2 - If unit 4 will be a dry cooling tower, then it will require some combination of water treatments, which should be relatively straightforward based on the draft designs. There should exist enough information for this analysis to be included in the DEIS.
5. Chapter 3, Pg 3-7, Line 17 - Generally speaking, the design basis for the new units will reject $\frac{1}{2}$ as much heat to the environment as each of the existing units. Is there a rationale for this, and for which designs does this apply?
6. Chapter 3, Pg 3-9, Line 18 - Please explain why radioactive waste management systems have not been identified. The description of the high level waste storage facility, security of this facility and the monitoring (frequency and type) are not addressed.



7. Chapter 3, Pg 3-9, Line 22 - If adequate design information is only available to accurately estimate liquid and gaseous effluents for 3 reactors, then this DEIS should only apply to those reactors. The usefulness of the information included in this DEIS is limited to those plants used as a design basis for the PPE. Otherwise, problems will arise when a PPE has been established, but a new design must "shoe-horned" into the parameters established by the PPE (which were based on other reactor designs).
8. Chapter 3, Pg 3-10, Line 15 - Enough information is available to definitively state the State and Federal regulations that apply.
9. Chapter 4, Pg 4-6, Line 12 - Can an analysis based on the groundwater available and current information on re-charge rates be developed at this stage?
10. Chapter 6, Pg 6-10, Line 33 - Please justify that the thermal effects from the use of all units would be negligible.
11. Chapter 6, Pg 6-20, Line 6 - Note the admission that the impacts of gas-cooled reactors would need to be assessed at the CP or COL stage, when more data is available on the design.
12. Chapter 6, Pg 6-22, Line 21 - Note that the document states that there exists significant uncertainty in the final design of any gas-cooled reactors. Thus, the DEIS should be limited to exclude the design of these reactors until specifics on the design are known. Same comment for Pg 6-38, Line 25.
13. Chapter 7, Section 7.8 - The statement that the impacts of operating the new units is 'well below the estimated effects from natural radiation' misses the point. The public has no control over natural radiation, but the point of this DEIS is to evaluate the impacts of citing 2 new nuclear units so that an informed decision can be made as to its merit.
14. Chapter 9, page 9-1, Line 31 - NRC has cited NEPA Section 102(2)(c)(iii) as requiring an analysis of alternatives to the proposed action. EPA believes this to include an analysis of a wide array alternatives not just alternatives of different sites. Furthermore, EPA believes this interpretation is reinforced by Section 102(2)(E) that requires all agencies of the federal government to "study, develop, and describe appropriate alternatives to recommended course of action in any proposal which involves unresolved conflicts concerning alternatives uses of available resources;"

