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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30308

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Mr. William H. Regan, Jr.
Chief, Environmental Projects Branch 2
Division of Site Safety and
Environmental Analysis
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Regan:

We have reviewed the Draft Environmental Impact Statement on the Watts Bar Nuclear Plants, Units 1 and 2, and have determined that the facility is capable of meeting the environmental radiation standards for nuclear power operations, 40 CFR 190 as well as the dose design objectives of 10 CFR 50, Appendix I.

There are, however, a number of areas which should be addressed in further detail in the Final Statement, i.e., the limits and control of all radionuclide plant effluent covered under the technical specifications for plant operation; the discharge of liquid radwaste; sensitivities of radiation monitors at the various effluent release points in terms of their ability to measure radioactivity concentration limits and discharge, and the radio-chemical toxicity of releases.

SPECIFIC COMMENTS

Pg. 5-23 Radioactive Effluents

The application of 100-year environmental dose commitment (EDC) for radioactive effluents such as Radon-222 is appropriately noted. We are encouraged that NRC is calculating EDC's as this is a big step toward evaluating the total EDC which EPA has urged for several years. Assessment of the total impact of the nuclear fuel cycle should incorporate the projected releases over the lifetime of the plant rather than just the annual release and be extended to consider for several half-lives or 100 years beyond the period of release.

Pg. 8-1 Decommissioning and Land Use

Upon completion of power generation a commercial nuclear power plant possesses waste characteristics quite different from those generated during operation. The environmental

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effects of a plant's considerable value and radioactive inventory should receive consideration in its decommissioning plan before the end of the reactor's useful life. Considering the size, complexity and number of commercial nuclear power plants, it would appear prudent to begin planning for decommissioning in an ALRRA fashion as early in plant life as possible. For example, it may be necessary to institute plant design changes to facilitate future dismantling. In addition, evaluation of social impacts and resource commitment on present and future generations should be considered. We believe an orderly decommissioning procedure should be developed for each site containing a LWR nuclear power plant well before its retirement.

Relative to non-nuclear discharges, it should be noted that the NPDES permits for the sewage treatment plant (Pages E-2 and E-3) must be consistent with the more stringent State permit (Page E-15) for fecal coliform and chlorine residual effluent characteristics. It would also be advantageous to show in Figure 3.3 the approximate location and length of the water treatment plant outfall pipe. This pipe must be extended to an adequate length into the river to guarantee proper dilution and mix.

On the basis of the above, the facility was rated LO-2, i.e., no significant environmental objections, however, additional information is requested. As soon as the final statement is available, we will need five copies for our review.

If we can be of further assistance, feel free to call on us.

Sincerely yours,

John A. Little, Deputy

bw
John C. White
Regional Administrator