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2-13-95

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Washington, D.C. 20555-0001

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1995 FEB 22 PM 3:30
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TO: Scott Newbury and others involved with the 1994 Watts Bar Draft EIS,

First of all, thank you for extending the comment period for the WB DEIS. I'm sorry this letter is not typed, but my typewriter is broken and i can't afford to fix it right now.

I have reviewed the Draft EIS and i would like you take the following into consideration when preparing the Final EIS. As you know, 4 species of endangered mussels have been identified at the Watts Bar site. Two additional species of mussels that are candidates for listing under the Endangered Species Act also exist near Watts Bar. Mussel beds that were not described in 1978 have since been documented. The discovery of additional endangered species at the Watts Bar site leads to questions about the accuracy of the survey. How thorough has the evaluation of mussel populations been? What assurances are there that these are the only existing mussel beds and populations? (re: 2-24) Molluscicides and chemicals that would be used and released at the site were tested on different aquatic organisms. However, NONE of the six endangered and threatened mussels at Watts Bar were in the same genre as the

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mussels that were used in the tests. The accuracy and reliability of these tests is therefore in question. (re: 5-8) It is expected that continued monitoring of mussels will show a "gradual decline in mussel species abundance and diversity." The Endangered Species Act mandates plans to recover endangered species populations and their habitats. No plans to recover or protect the endangered mussel species are described. If the loss of species is predicted and documented, why aren't there efforts to recover these species and their respective habitats? (re: 2-24) These efforts for recovery must occur and must include the designation of critical habitat restoration ecology, and reestablishment of populations. There is also a need to discuss the cumulative impacts of environmental degradation on the existing mussel populations. The mussel beds around the Watts Bar Nuclear Site do not exist in a vaccuum. What will the cumulative effects of activities upstream have on these species when combined with activities such as molluscicide use at the WB site? You also need to consider what effects "batch releases" of "slightly" radioactive materials will have on mussel populations and the aquatic ecology in general. Please also consider the cumulative

impacts on the TN river ecosystem that batch releases will have when combined with batch releases from the Sequoyah Nuclear Site and other industrial + municipal sewage discharge sites. What will the effects be on human populations, H_2O Quality and the drinking water supply? I don't believe the issue of "batch" releases of Tritium and other materials has been adequately addressed in this EIS. The EIS also does not address unplanned discharges into the river from minor "industrial incidents" that are bound to occur at the WBN site. For example, in 1984 a transformer fire occured at the Sequoyah Nuclear site. Subsequently, Poly-chlorinated biphenyls (PCB's) leaked into a holding pond at the site. It was later discovered by TVA that this holding pond was adequately lined and the PCB's had been steadily flowing into the Chickamauga Reservoir. Watts Bar Nuclear is plagued by fires, accidents and other "industrial incidents". What effects will these have on the aquatic and terristrial ecosystems surrounding the facility? Again, cumulative impacts on the area ecology and drinking water supply need to be addressed.

The DEIS does not adequately address the possibility of <u>seismic</u> activity in the TN river valley

and how this would effect operations at WBN and other sites. It is my understanding that the TVa is or has commissioned the University of North Carolina to conduct a study of a suspected fault line running the length of the valley and awfully close to WBN and Sequoyah N. The NRC should demand that this information (even if the study is incomplete) be shared and open to public scrutiny.

A major failing of the NRC's WB DEIS is that it fails to address the concept of <u>Cumulative Impacts</u>. TVa itself set a precedent for this with its 1993 Chip Mill EIS. Considering cumulative + off site impacts is also required by the National Environmental Policy Act (NEPA - i'm sorry i can't quote the right CFR # for you). Areas involving cumulative impacts that need to be addressed include:

sediment + pollution from the Clinch river (Oak Ridge National Labs + associated activities) (re 2-13) that have built up in the WB reservoir and continue to degrade the TN river ecosystem; other chemicals in the TN river (especially Eastman Kodak discharges, DuPont, Knoxville Sewage discharges, dioxin from the Pigeon River and others re: 2-10); cumulative impacts on H_2O quality ~~etc~~; TVa herbicide program etc.

You also need to address the cumulative impacts of general habitat destruction in the TN Valley, Cumberland Plateau, and Southern Appalachian Mtns. How will operations at WBN contribute to the cumulative effects on species, their habitat and human ecology that this general pattern of environmental degradation is having on this bioregion. You also need to consider the cumulative impacts that operations at WBN will have when combined with acid rain, ground level ozone and increased UV-B radiation (due to a depleted ozone layer in the stratosphere). The overall ecological health of the whole watershed must be considered!

especially endangered species like eagles, bats and snail darters!

In the area of socioeconomic impacts, the DEIS fails to address the likelyhood of an accident considering WBN's poor safety record and the documented intimidation of workers who bring up safety concerns. How can you speak of environmental justice when "whistleblowers" are harassed and the NRC signed a 1991 "Memo of understanding" with the TVA Inspector General Norman Zigrossi that allows the NRC to turn over the names of whistle blowers.

The NRC also fails to address the issue of nuclear waste that would be created by the WBN. Where will this waste be stored?

Who will pay for it? How will it be stored safely?

In closing, i would like to thank you for your effort to update the 1978 EIS in light of the fact that the TVA has refused to do so. Please reconsider your "finding of No Significant Impact." WBN has the potential to significantly effect human and non-human life in this region. Do NOT give it an operating license! The bureaucrats at the TVA are inept, bungling fools and WB is unsafe, uneconomical and unnecessary. Please hold more public hearings to address the construction permit and operating license of WB Nuclear.

Thank you for your time and consideration.

For the EARTH

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