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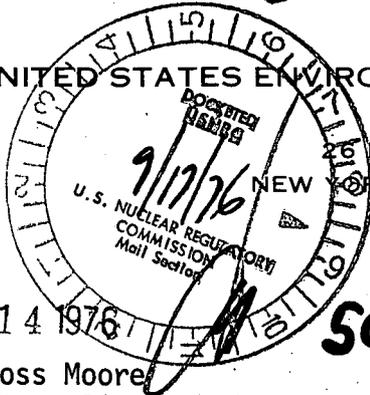


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

26 FEDERAL PLAZA

NEW YORK, NEW YORK 10007



SEP 14 1976

50-247

Mr. Voss Moore
Assistant Director for
Environmental Projects
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Moore:

The Environmental Protection Agency has reviewed the final environmental impact statement issued by the Nuclear Regulatory Commission on the Selection of the Preferred Closed Cycle Cooling System at Indian Point No. 2 located in Westchester County, New York. We have no objection to the proposed action, but offer the following comments for your consideration.

The EPA believes that the proposed replacement of the once-through cooling system with a closed-cycle cooling system will have benefits which far outweigh potential adverse impacts. The large volume flows required by once-through cooling would be substantially reduced by a closed-cycle cooling system, and in turn, biotic effects due to entrainment, impingement, thermal shock, gas bubble disease, etc. would be proportionally reduced.

The major environmental effects of cooling towers considered in the final statement are deposition of salt, fogging and icing conditions, and increased noise levels. We agree that none of these factors is likely to be of sufficient magnitude to cause rejection of any of the cooling tower alternatives.

It is our opinion that the statement presents a comprehensive analysis of the economic, energy and environmental impacts of the proposed action. We agree that natural draft (Con Edison's preferred alternative), fan-assisted natural draft and circular mechanical draft are the more preferable closed-cycle systems from both an environmental and economic standpoint. With respect to economic considerations, the NRC approximates the incremental cost to Con Edison's customers to be 0.8 mills per kilowatt-hour for each of the aforementioned closed-cycle systems. Such incremental cost, which would amount to 40 cents per month for a customer using 500 kilowatt-hours of electricity, constitutes an increase of less than 1%. It is our judgment that such an increase would not place undue financial burden on Con Edison nor its customers.

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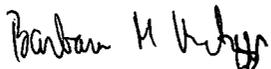
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As indicated in the final statement, the National Pollutant Discharge Elimination System (NPDES) permit for Indian Point Units 1 and 2 requires the cessation of once-through cooling at Unit 2 by May 1, 1979. This requirement was based on Section 316(b) of the Federal Water Pollution Control Act Amendments of 1972, not the NRC license schedule, as stated on page 4-4.

The final statement is correct, however, in that the permit compliance schedule is stayed pending adjudication. The final decision concerning the closed-cycle cooling requirement at Unit 2 and its associated compliance schedule will be made as a result of an adjudicatory hearing to be held by Region II. The final statement implies that a State Pollutant Discharge Elimination System (SPDES) permit or modification of the existing NPDES permit and State 401 Certification is required in order for Con Edison to construct a closed-cycle system (p. 4-4). This is not the case. A SPDES permit is unnecessary since a NPDES permit has been issued for Units 1 and 2; modification of the existing permit and State 401 Certification is unnecessary since the former requires closed-cycle cooling and the latter can be used for closed-cycle or once-through cooling.

Thank you for your consideration of our comments on the draft statement for this action.

Sincerely yours,



Barbara M. Metzger
Chief
Environmental Impacts Branch