

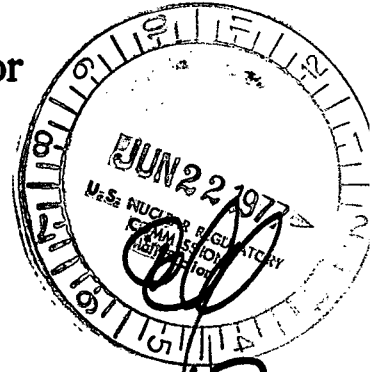


# United States Department of the Interior

OFFICE OF THE SECRETARY  
WASHINGTON, D.C. 20240

ER-77/316

JUN 16 1977



50-247

Mr. George Knighton, Chief  
Environmental Projects Branch No. 1  
Division of Site Safety and  
Environmental Analysis  
Nuclear Regulatory Commission  
Washington, D. C. 20555

**REGULATORY DOCKET FILE COPY**

Dear Mr. Knighton:

We have reviewed Consolidated Edison Company's transmittal of March 28, 1977, forwarding an application and an environmental report concerning the elimination of the requirements for termination of operation with once-through cooling system for Indian Point, Unit 2, Westchester County, New York [Docket 50-247].

General Comments

Our review of the environmental report indicates that it does not provide sufficient reason to alter our previous positions regarding the licensee's proposed extension of once-through cooling. Those positions are expressed in our comments of February 15, 1977, April 26, 1976, and October 6, 1975. We continue to maintain that the methodologies used by the licensee to assess the aquatic impacts resulting from once-through operation of Indian Point Unit 2 seriously underestimate the absolute and relative importance of those impacts.

We still disagree with the licensee's treatment of the following controversial subjects: 1) shape and magnitude of the compensation function; 2) contribution of Hudson River striped bass to the mid-Atlantic fisheries; 3) values assigned so-called f factors; 4) accuracy of entrainment and impingement estimates; 5) accuracy of projected losses to recreational and commercial fisheries; 6) magnitude of transport avoidance factors; and 7) inclusion of pre-1970 power plant background. Specific points of disagreement are clearly pointed out in the Department's previous comments regarding these issues.



8111160274 770616  
PDR ADOCK 05000247  
PDR

771740117