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Docket No. 50-247

Daniel R. Muller, Assistant Director for Environmental Projects, L

**COMMENTS ON PRELIMINARY DRAFT ENVIRONMENTAL STATEMENT FOR INDIAN POINT
 UNIT 2 NUCLEAR GENERATING PLANT**

Plant name - Indian Point Unit 2
 Licensing stage - OL
 Docket number - 50-247
 Responsible branch - Environmental Projects Branch #1
 Project leader - M. Oestmann
 Requested completion date - August 31, 1972
 Description of response - same as subject
 Review status - Complete as regards to Cost-Benefit Analysis Branch

The attached comments represent the input from the Cost-Benefit Analysis Branch on the preliminary draft environmental statement. These comments in draft form were hand carried to the project leader on September 1, 1972.

15/ B. Denton
 for
 Harold R. Denton, Assistant Director
 for Site Safety
 Directorate of Licensing

Enclosure:
 As stated

cc: w/o encl.
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DATE ▶	9/6/72	9/7/72			

COMMENTS ON PRELIMINARY DRAFT ENVIRONMENTAL STATEMENT
FOR INDIAN POINT UNIT 2

General Comment

Overall, the environmental statement is quite comprehensive and well prepared. We would be most fortunate to have this much supporting information in other environmental statements. Some questions remain outstanding but are largely the result of our decisions rather than that of the utility.

Specific Comments

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VIII-10

"Load", I believe, is the word to use here rather than "load." At the bottom of this page it would seem that "formulated" would be preferred to "found" in this context.

XI-31

To not improperly accuse the applicant of misdoing, switch the emphasis of statement relating to 8.75% rather than an 8% discount rate. Based on the earlier guidelines, it was the AEC which used an 8% discount rate then switched to 8.75%. It should not appear that the applicant is guilty of wrong doing by using what we had directed him to use in an earlier guideline.

XI-32

At the bottom of this page, replace the word "claimed" by the applicant with the word "estimated."

XI-42

For the fossil fuel pollutants, backup data are needed on the pollution rate from these uncontrolled sources---pounds sulfur per million Btu, etc., to help the reader determine the basis of the air pollutant computations.

XI-44

It was a position taken by the AEC staff earlier that a value of contribution to gross regional product should only be shown in high unemployment or poverty areas. The current guidelines, however, indicate that net economic and social benefits derived by installation of the facility should be shown under all

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circumstances. There is nothing in NEPA 1969 which suggests that benefits should be shown where specific needs exist and ignored where current conditions have not deteriorated to the point of high poverty and unemployment. If the economy is not continually fed with new projects, it would follow that all areas would eventually reach the poverty level.

XI-46

On this page, I note that the equation for plant cost uses a discount rate factor, but also an annual carrying charge factor of 13.0 percent. If the annual carrying charge includes a depreciation component, then it should not be used. The present worth equation of (10.5) has already accounted for depreciation.