

ENVIRON

Docket No. 50-286

APR 24 1972

Mr. William J. Cahill, Jr.
Vice President
Consolidated Edison of New York, Inc.
4 Irving Place
New York, New York 10003

Dear Mr. Cahill:

In preparing for a National Environmental Policy Act of 1969 (NEPA) review of your Indian Point Unit No. 3, we have found that the documentation submitted to date by Consolidated Edison has several areas which appear to be deficient. Unless these areas are updated or revised, review at this time is impractical. We have identified the following deficient areas:

- a. The population information should be updated to the 1970 census values from the 1960 census values reported.
- b. The thermal and hydraulic model results do not reflect the relocation of the condenser cooling water discharge openings from 18 to 12 feet below the mean low water level reported during the Indian Point Unit No. 2 NEPA review. Updated information on thermal discharges is also needed.
- c. Section 20.0, Ecological Effects of Thermal Discharges, does not appear to include an analysis of all of the research reported in the various appendices. Such an analysis is necessary and should include the results as well as the conclusions.
- d. Section 23.0, Accidents, does not include all of the guidance offered in the 10 CFR Part 50 dated December 1, 1971, proposed index of Appendix D entitled, "Discussion of Accidents - Applicant's Environmental Report: Assumptions."
- e. The alternatives covered in the report do not include adequate evaluations of the following alternate cooling systems:

(1) Wet cooling towers with fresh water make up piped from up river near the New York City Chelsea Pumping Station.

(2) The discussion of dry cooling towers does not recognize the fact that the petro-chemical industry has utilized air-blast cooling

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units for dissipating waste heat in the quantity which nearly approximates Indian Point Unit No. 3 heat rejection, that the existing turbine is capable of operating structurally at the lower vacuum which would be required for dry-cooling towers, and that it may be conceivable that the present condenser could be retubed for multi-pass operation required for dry-cooling tower operation.

- f. The cost-benefit section needs to be revised to be consistent with the "Proposed AEC Guide to the Preparation of Benefit-Cost Analyses to be Included in Applicant's Environmental Report" (for defined classes of completed and partially completed nuclear facilities), dated January 7, 1972.

Until the information outlined above is received, we will be unable to continue our review of Indian Point Unit No. 3 and prepare the Environmental Statement. Please inform us when you intend to submit this additional information so that we can schedule the remainder of the review.

Sincerely,

BS/ Karl R. Yaller for

Richard C. DeYoung, Assistant Director
for Pressurized Water Reactors
Division of Reactor Licensing

cc: LeBoeuf, Lamb, Leiby
& MacRae
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