



DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

OFFICE OF THE SECRETARY

WASHINGTON, D.C. 20201

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Regulatory Docket File

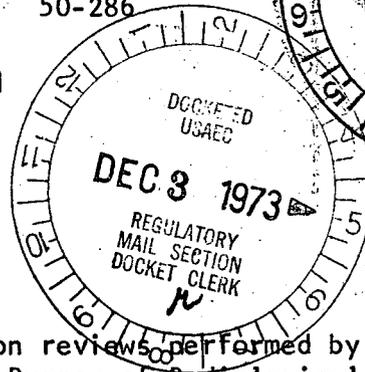
Mr. Daniel R. Muller
Assistant Director for Environmental
Projects
Directorate of Licensing
Atomic Energy Commission
Washington, D. C. 20545

Dear Mr. Muller:

The following comments are based upon reviews performed by our regional office in New York and the Bureau of Radiological Health concerning the draft Environmental Impact Statement on the Indian Point Nuclear Generating Station, Unit 3.

1. Indian Point Nuclear Generating Plant, Unit 3 is the third of three reactor plant installations to be constructed and operated on the same site. Units 1 and 2 are already constructed and in operation. The draft statement includes consideration of the cumulative effect of all three reactors in operation.
2. From information contained in this draft statement, it appears that this third unit can be constructed and operated without undue health impact on the population as a result of radiation exposures or discharges of radioactivity to the environment. The report notes that in order to meet the AEC "as low as practicable" criteria, it will be necessary to modify the radioactive waste treatment facilities. The report prescribes a date of spring 1975 to accomplish completion of this modified radioactive waste treatment facility. This is an appropriate recommendation.
3. The report discusses doses to the population which might reasonably be expected from an incident occurring at the reactor site. The derivation of these ~~doses~~ and the postulation of the types and frequency of incidents which might occur appear reasonable. The projected doses are not excessive; in fact, based on the estimates and calculations in the report, doses to individuals at the site boundary would be well below the maximum permissible doses derived from 10 CFR, Part 20 of the AEC Regulations for normal operations. The estimated dose to populations within a 50-mile radius of the site would be a small fraction of the population dose from natural background, as expressed in man-rems.

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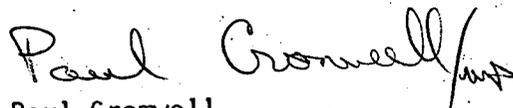


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4. Section E.1.d. states that the solid wastes will eventually be shipped to a licensed burial facility. The specific burial site may not yet have been identified and such burial sites may be covered by other impact statements, but it is suggested that a discussion of the capacity of burial sites to handle the material from this plant, perhaps as a percentage of existing burial site capacity, be included in this statement.
5. Exposures from transportation of radioactive materials to and from the plants is discussed. These are very small exposures and are based on realistic assumptions. The question of transportation accidents is discussed, but in very general terms. However, the discussion is adequate and as concise as is possible based on the current information from the history of transportation accidents.
6. Considering the protection of fish, fish food at the plant site, it is recommended that the applicant study alternatives to the presently designed once-through cooling system for the plant--namely, the use of cooling towers in order to reduce the volumes of water pumped from the river and entraining fish. The applicant is told to design and install an alternate cooling system within the next four years to remedy this situation. This appears to be a sound recommendation.

Sincerely,



Paul Cromwell
Acting Director
Office of Environmental Affairs.