



OFFICE OF THE ASSISTANT SECRETARY OF COMMERCE
Washington, D.C. 20230

50-286

November 26, 1973



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

Dear Mr. Muller:

The draft environmental impact statement for the proposed "Indian Point Nuclear Generating Station, Unit No. 3," which accompanied your letter of October 17, 1973, has been received by the Department of Commerce for review and comment.

The statement has been reviewed and the following comments are offered for your consideration.

With regard to the release of routine radioactive wastes to the atmosphere, it is not clear whether the major portion of the releases are sporadic or continuous. In the case of sporadic releases, the application of an annual average atmospheric dilution factor is inappropriate. For example, the gaseous processing system, which is the primary source of radioactivity, involves a minimum gaseous holdup time of 45 days in decay tanks. If this is followed by release to the atmosphere in a few hours, we would consider the source to be sporadic.

8529

8111240867 731126
PDR ADOCK 05000286
D PDR

Thank you for giving us an opportunity to provide these comments, which we hope will be of assistance to you. We would appreciate receiving a copy of the final statement.

Sincerely,

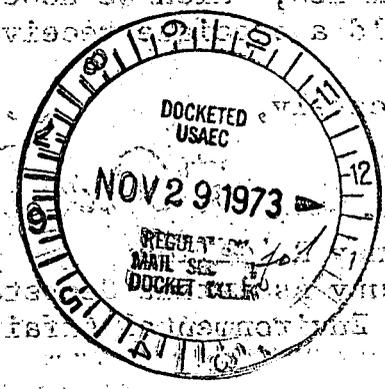


Sidney R. Gallie

Sidney R. Gallie
Deputy Assistant Secretary
for Environmental Affairs

Regulatory File Cy.

... of ... to ...
... of ... will be ...
... a copy of the ...



1

M. J. Chestman
50-3-
50-247
50-286
Henry L. Diamond
Commissioner

Regulatory Docket File

July 16, 1973

Mr. Harry G. Woodbury
Executive Vice President
Office of Environmental Affairs
Consolidated Edison Company
4 Irving Place, Room 1624
New York, New York 12033



Dear Mr. Woodbury:

The Hudson River Technical Committee has reviewed the status of the Indian Point studies and brought several matters to our attention. They are:

1. Impingement studies - The validity of the data collected at the intake screens since the installation of air curtains is highly questionable. The curtains have created a positive outward flow away from the screens so that fish already killed or damaged by impingement are moved out into the river rather than onto the traveling screens for subsequent enumeration. This has introduced a variable in the counts which cannot be measured at this time. The Policy Committee must withdraw its endorsement of the impingement studies until they have been redesigned to account for this variability.

2. NYU Plankton Studies - The Technical Committee discussed the implications of dropping the 7 plankton stations near Indian Point in 1973 with Dr. Lauer. The Committee is now satisfied that this baseline will not be totally compromised since QLM will be sampling in the same area and there has been little between - station variability to date. However, apparently only ichthyoplankton will be processed by QLM. The Committee recommends that at least the crustaceans to the genus level be processed also to monitor the baseline and as additional data for the fish food habit studies.

3. Trawling Program - The Committee reviewed the changes in the trawling program proposed by Dr. Kacynski and agrees with the changes as presented at their May 11 meeting.

Sincerely,

Herbert E. Doig
Herbert E. Doig
Chairman

Hudson River Policy Committee

