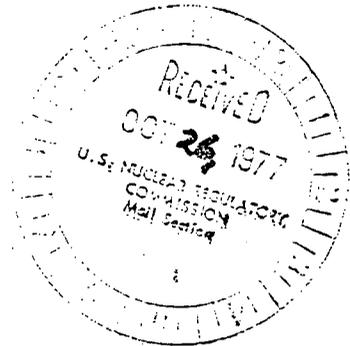




Department of Energy
Washington, D.C. 20545

OCT 20 1977

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



Dear Mr. Knighton:

This is in response to your transmittal dated August 8, 1977, in which you invited the Energy Research and Development Administration (ERDA) to review and comment on the Nuclear Regulatory Commission's draft environmental impact statement concerning the selection of the preferred closed cycle cooling system at Indian Point Unit No. 3 (Docket No. 50-286). Since that time, ERDA was abolished under the Department of Energy (DOE) Reorganization Act of 1977 and on October 1, 1977, those functions previously assigned ERDA were assumed by DOE.

ERDA staff review of the statement has indicated that the proposed action would not conflict with current or known future ERDA programs. Staff comments are enclosed which you may wish to consider in the preparation of the final statement.

Thank you for the opportunity to review and comment on the draft statement. Future NRC statements should be directed to DOE as noted below.

Sincerely,

W. H. Pennington, Director
Office of NEPA Coordination

Enclosure:
ERDA Staff Comments

cc w/enclosure:
Council on Environmental
Quality (5)

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ERDA STAFF COMMENTS
ON THE
NRC DRAFT ENVIRONMENTAL STATEMENT
FOR SELECTION OF THE PREFERRED
CLOSED CYCLE COOLING SYSTEM AT
INDIAN POINT UNIT NO. 3
NUREG-0296

1. Front page (i) indicates Unit No. 2; this should be Unit No. 3. There is no discussion of constituents in the drift water other than salt. What about organics such as PCBs? The Hudson River is reported to be the worst in the Nation for PCB contamination. Would this be a problem?
2. The comments on page iv., 7a, are not consistent with the basic report (see page 1-14). Natural draft towers are very clearly the preferred, if not the only acceptable solution, considering the very close proximity of the villages involved and the noise and potential for fog and icing of the lower mechanical draft towers. Earlier environmental statements for Indian Point No. 2 had indicated that the noise level in nearby schools would be above recommended levels--even for mechanically assisted natural draft towers which would have relatively low noise. This subject is not discussed anywhere in this report.
3. Item 7.C. should more positively reinforce the applicant's selection of natural draft towers. This indecisiveness in the conclusions stems from failure to properly differentiate between the alternates elsewhere in the report such as on page 5-91 (See also discussion on pages 100, 101). The staff finding of page 5-100, last paragraph, is not reflected in the Summary Conclusions on page iv.
4. On page 5-1, third paragraph, Section 5.1.1.1, it is indicated that precipitation has not been observed from plumes. An article in Science, September 1976, indicated that precipitation has occurred, although, we would not attach great significance to this. Were it not for the close proximity of Buchanan, we would support the wet/dry solution as preferred for this site.
5. For completeness, this report should have dealt with the alternates such as improved inlet screens and beneficial use of the waste heat--at least in summary fashion. It is realized that extensive earlier treatment was given to this in the Indian Point No. 2 deliberation. However, it would be our view that these various docket items should stand alone.