



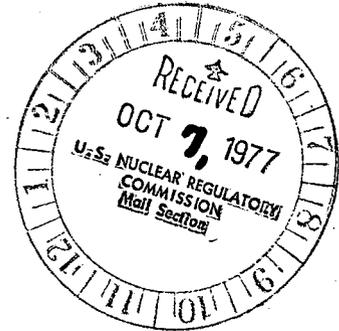
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II
26 FEDERAL PLAZA
NEW YORK, NEW YORK 10007

03 OCT 1977

50-286



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

Dear Mr. Knighton:

We have reviewed the draft environmental impact statement (EIS) for the selection of the preferred closed-cycle cooling system at Indian Point Unit No. 3, and we have determined that additional information will be needed in the final EIS on the economics and the potential radiological effects of closed-cycle cooling. Our views on the project's potential effects on water quality and aquatic biota are already a matter of record and do not require further comment. As you know, these issues will be the subject of an upcoming adjudicatory hearing on EPA-Region II's permit requirement (under the National Pollutant Discharge Elimination System) for closed-cycle cooling at Indian Point Unit No. 3 and other Hudson River power plants.

In general, we agree that the natural draft, fan-assisted natural draft, and circular mechanical draft cooling tower alternatives are environmentally and economically preferable to the other systems considered. Our review indicates that the air quality and noise impacts of the proposed project will be minor. However, our review also indicates the need for more detailed information concerning the discharge of radiological wastes.

As a result of the change-over to closed-cycle cooling, the amount of water available for dilution of radioactive waste effluents will be reduced from 870,000 gpm to 45,000 gpm, a reduction factor of 19. According to Table 6-9 of Con Edison's Economic and Environmental Impacts of Alternate Closed-Cycle Cooling Systems for Indian Point Unit No. 3 (January 1976), the largest percentage of the 10 CFR 20 limits would be I-131 (9.38 percent as opposed to 0.35 percent with once-through cooling). While 9.38 percent is well within the permissible range, we believe that two points in the EIS require clarification.

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First, the EIS should indicate whether or not any changes to the radwaste system are planned as a result of the change-over to closed-cycle cooling. Second, the final EIS should identify precisely the point at which the radwaste effluent will be released into the Hudson River. With a once-through cooling system, the radioactive liquid waste can be released into the circulating waters before final release into an estuary. The draft EIS indicates only that the radwaste will be diluted in the blowdown from the closed-cycle cooling system. We suggest that the final EIS include a flow chart that clearly illustrates the relationship between the radwaste system and the closed-cycle cooling system. Also, the dose estimates from the radwaste effluents should be compared to the limits expressed in 40 CFR 190 and 10 CFR 50 instead of just to those in 10 CFR 20.

On the subject of economics, we believe that some clarification is required. The economic analyses presented in the draft EIS are based primarily on information supplied by Con Edison in its January 1976 report. As a result, the draft EIS does not reflect the fact the Power Authority of the State of New York (PASNY), the present owner, and not Con Edison would incur the cost of installing and operating a closed-cycle cooling system at Indian Point Unit No. 3. We suggest that cost estimates in the final EIS be based on PASNY ownership in order to reflect the actual situation.

We have rated the draft statement LO-2, indicating a lack of objections (LO) to the project provided that the additional information (2) needed to finalize that conclusion is included in the final EIS. If you have any questions about our comments or if we can be of further assistance, please call us at 8-264-8556.

Sincerely yours,



for Barbara M. Metzger
Chief
Environmental Impacts Branch