

FEDERAL POWER COMMISSION
WASHINGTON, D.C. 20426

REGULATORY DOCKET FILE COPY

50-286

SEP 30 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 letter of August 8, 1977, addressed to the Commission's Advisor on Environmental Quality, requesting comments on the draft environmental statement related to the selection of the preferred closed cycle cooling system at Indian Point Unit No. 3. The plant is located in the Village of Buchanan on the Hudson River estuary, 24 miles north of the New York City boundary line.

The Facility Operating License No. DPR-64 requires the termination of the existing once-through cooling procedure at Unit No. 3 by September 15, 1980. The applicant has selected a natural draft wet cooling tower to replace the once-through system. The 965-megawatt unit is owned by the Power Authority of the State of New York and operated by the Consolidated Edison Company of New York, Inc.

These comments of the Federal Power Commission's Bureau of Power are made in accordance with the National Environmental Policy Act of 1969. Our principal concern with proposals affecting land and water resources is the possible effect of such proposals on bulk electric power facilities including potential hydroelectric developments, and on natural gas pipeline and related facilities.

Relocation of Gas Pipeline

It is indicated on Pages 3-13 and 4-2 that a natural gas pipeline owned by Algonquin Gas Transmission Company will have to be relocated because of its proximity to the proposed cooling tower and that a Federal Power Commission permit would be required.

If impacts on safety, socioeconomics including maintenance of service, and other aspects associated with the relocation of this pipeline are of



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such a magnitude that they would constitute a "major federal action having a significant effect on the quality of the human environment," the preparation of an environmental impact statement would be required before the Federal Power Commission could issue the permit. In order to avoid the likelihood of this requirement, we suggest that the Nuclear Regulatory Commission's final environmental statement contain a description of actions required and impacts of relocating the pipeline. We suggest that this description include a map showing the existing and proposed locations of the pipeline and the relationship to other features including the power plant and cooling towers.

Availability of Once-through Cooling

According to Page 3-15 of the environmental statement the applicant will have the capability of operating the plant with once-through cooling or with the closed cycle cooling system. We would like to point out the significant potential value of maintaining the operating condition of the once-through system.

1. In periods of severe cold weather it may be determined to be in the interest of aquatic resources to discharge part or all of the waste heat into the river.

2. Cooling tower operational experience may show that effects of the cooling tower plume are greater than anticipated during abnormal atmospheric conditions. Since these abnormal conditions usually occur during the winter season, use of the once-through system to convey all or part of the waste heat from the plant could serve to alleviate these conditions.

3. According to the statement, the average capability of the plant will be reduced by about 4% (33.5 MW) as a result of shifting from the once-through system to cooling towers. An oil-fired plant such as Bowline Point would require over 300,000 barrels of oil per year to make up this lost capability. Therefore, if a critical oil or gas shortage reoccurred comparable to that of 1973 with the oil embargo or the winter of 1976-77, the plant could be shifted to once-through cooling and the savings in fuel could be realized.

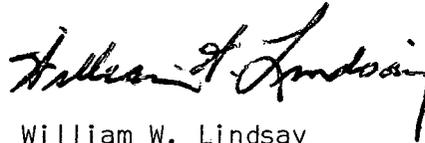
4. Future conditions may result in a different set of tradeoffs among fuel consumption, atmospheric discharges of waste heat, esthetics, fish and wildlife requirements, and other factors in power plant operation. By having the flexibility of using once-through cooling, cost and adverse environmental effects could be minimized.

Mr. George W. Knighton

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We hope our comments will be helpful to you in the preparation of the final environmental impact statement.

Very truly yours,

A handwritten signature in cursive script, appearing to read "William W. Lindsay".

William W. Lindsay
Acting Chief, Bureau of Power