



# United States Department of the Interior

OFFICE OF THE SECRETARY  
WASHINGTON, D.C. 20240

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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:

Thank you for your letter of August 8, 1977, transmitting copies of the Nuclear Regulatory Commission's draft environmental statement for selection of the preferred closed-cycle cooling system at Indian Point Unit No. 3, [50-286], Westchester County, New York.

We have reviewed the draft statement and reiterate below several of our concerns from our comments on the draft statement for selection of preferred closed-cycle cooling system at Indian Point Unit No. 2 (Attachment 1), and in our comments on the draft statement for extension of operation with once-through cooling for Indian Point Unit No. 2 (Attachment 2). These issues, summarized below, remain of concern to us on the selection of a cooling system for Unit 3.

Additional comments are presented according to the format of the statement or by subject.

### General

We are concerned that the ultimate decision on the selection of closed-cycle cooling systems at Indian Point Unit No. 3 will only be prolonged by the differences in the evaluations made by the NRC staff and the applicant.



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We believe that the once-through cooling systems presently in operation at Indian Point have the potential for causing unacceptable long-term impacts on the fisheries of the Hudson River. Any licensing delays will only lengthen the exposure of fish populations of the Hudson River and Middle Atlantic coastal States to adverse impacts which previously have been determined to be unacceptable. Positive steps should be taken as quickly as possible to reach an agreement on the use of closed-cycle cooling systems at Indian Point.

### Impacts on Groundwater

The final statement should show the location of surrounding wells on a map that includes contours on the water table and should give the typical range of depths to water. This information is needed in the evaluation of the effects from the potential infiltration of salts from cooling tower drift. The draft statement considers the potential for buildup of saline soils to be negligible because of the frequency of rainfall; however, we do not find any indication that infiltration to groundwater has been considered--except by implication in the assertion that groundwater flow will be to the river rather than to surrounding wells. The final statement should assess this issue.

### Cultural Resources

We recommend that a qualified archeologist be consulted and that the final statement provide a more detailed discussion concerning the presence of archeological values, the probability of the project's impact on them, and the disposal of excavated material from construction. Even though the area has recently been disturbed by plant construction, the potential for impact upon cultural resources at the construction site was inadequately considered in the draft statement; it appears that only a literature survey has been made.

Historic sites have been given initial consideration to the extent of locus identification and a brief evaluation of probable impacts in the draft statement. Among the sites listed, many of which are indicated on the National Register

of Historic Places, there are some (not so indicated) that are also National Historic Landmarks. Of these National Historic Landmarks, we believe the following bear closer evaluation in the final statement: (1) Stony Point Battlefield, (2) Palisades Interstate Park, and (3) Van Cortlandt Manor. A more detailed discussion of these sites should be presented in the final statement.

While the staff conclusion of negative impact on page 6-28 of the draft statement may hold true, we believe it should be substantiated by the display and discussion of a favorable commentary in the final statement from the State Historic Preservation Officer and from the qualified archeologist as mentioned above.

Page 5-96 - The amount of the Hudson River's tidal flow appears to be a misprint; probably it should be 180,000 cfs and corrected in the final statement.

We hope these comments will be helpful to you in the preparation of a final statement.

Sincerely,  


Larry E. Meierotto  
Deputy Assistant SECRETARY

Attachments (2)