United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

ER 71/193

MAY 9 1975

RECEIVED 5-14-75

Dear Mr. Knighton:

Enclosed are Fish and Wildlife Service's comments on Supplement No. 11 to environmental report for Indian Point Nuclear Generating Station, Unit No. 3, Westchester County, New York.

We hope these comments will be helpful to you.

Sincerely yours,

Bruce Blanchard, Director
Environmental Project Review

Mr. George W. Knighton
Chief, Environmental Projects
Branch No. 1
Directorate of Licensing
Nuclear Regulatory Commission
Washington, D. C. 20555

Enclosure

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ADDRESS ONLY THE DIRECTOR,
FISH AND WILDLIFE SERVICE

United States Department of the Interior

FISH AND WILDLIFE SERVICE
WASHINGTON, D.C. 20240

In Reply Refer To:
FWS/ES
ER-71/193

MAR 6 1975

MEMORANDUM:

TO: Director, Office of Environmental Project Review
Office of Assistant Secretary-Program Development and Budget

FROM: Acting Associate Director, Fish and Wildlife Service

SUBJECT: Supplement No. 11 to Environmental Report for Indian Point Nuclear Generating Station, Unit No. 3 Westchester County, New York (ER-71/193)

This is in response to your January 3, 1975 request for review and comment on subject. Our comments are provided in accordance with provisions of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.).

The following specific comments on the document relate to answers that were provided by the applicant.

Question 1

A 5% loss factor due to impingement on the Unit 3 intake screens cannot be considered reasonable until data from tests referred to in the response are available for review. We suggest the applicant be required to provide response to this question after such tests have been completed.

Question 11

Volume IV of the Hudson River Fisheries Data Summary did discuss gear efficiency, but only in regards to comparison of Texas Instruments gear to Hudson River Fisheries Investigations gear. It does not address a comparison of the different ichthyoplankton gear used by Texas Instruments

in their Hudson River surveys, which is critical in determination of entrainment losses. The comparison of efficiency and selectivity of the Tucker Trawl and epibenthic sled is very important for an accurate impact assessment of all power plants along the Hudson.

Question 12

The criteria for choice of the stratified random sampling technique by Texas Instruments was not due to suitability for entrainment models developed by Quirk, Lawler, Matusky and the Atomic Energy Commission. In fact, both these models were developed to comply with the sampling. The applicant, in this case, put "the cart before the horse." Also, the applicant does not provide adequate statistical justification for not collecting bottom and other depth samples simultaneously, as requested by the Atomic Energy Commission.

Question 14

Applicant does not adequately answer the question. Applicant should be requested to provide a reference to the "standard scientific procedure" referred to in the response.

Question 15

A value of 1 was recorded for volume sampled during a questionable or non-measurement. However, the applicant does not describe how this "corrected" volume measurement was used to calculate ichthyoplankton densities. A full explanation by the applicant of how these volume measurements were incorporated into the assessment of ichthyoplankton in the Hudson River should be requested.

Question 17

How will the 1974 epibenthic sled studies be conducted in the shoal areas? Our understanding is that previous attempts to use sleds in the shoal areas failed due to excessive clogging of the nets. In addition, applicant does not fully answer this question; depths, distances and the reasoning for extrapolation of beach seine/sled results are not given.

Question 18

Does the applicant's definition of shore (beach) areas include areas that could be sampled, or areas that were sampled? The statement should be clarified. In addition, justification should be provided by the applicant for using an arbitrary maximum cutoff point of 20 feet for shoal areas.

Question 25

If the technical experience of applicant's investigators was "second to none" in separating white perch and striped bass larvae 8-14 mm in size, then why were questionable larvae sent to Mansueti and Dovel for identification? Ability to separate these two species is extremely important

in all impact assessment work on the Hudson River, since failure to do so confounds attempts to predict entrainment losses.

Karl F. Stutzman