

JUN 27 1978

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~~Docket No. 50-286~~

MEMORANDUM FOR: Ronald L. Ballard, Chief  
Environmental Projects Branch 1  
Division of Site Safety and Environmental Analysis

FROM: Donald P. Cleary, Section Leader  
Regional Impact Analysis Section  
Cost-Benefit Analysis Branch  
Division of Site Safety and Environmental Analysis

SUBJECT: RESPONSES TO COMMENTS BY VARIOUS PARTIES CONCERNING  
THE PREFERRED CCCS FOR INDIAN POINT UNIT NO. 3 DES  
(NUREG-0296)

PLANT NAME: Indian Point Unit No. 3  
DOCKET NUMBER: 50-286  
LICENSING STAGE: Post-OL  
RESPONSIBLE BRANCH: EPB No. 1  
PROJECT MANAGER: R. P. Geckler  
DESCRIPTION OF RESPONSE: Review Comments  
REVIEW STATUS: Complete

CBAB staff has reviewed comments contained in Dr. Geckler's memo of May 26, 1978. Our responses are attached.

Mike Kaltman was responsible for this review; any comments by your staff should be addressed to him on ext. 27906.

Donald P. Clear, Section Leader  
Regional Impact Analysis Section  
Cost-Benefit Analysis Branch  
Division of Site Safety and  
Environmental Analysis

Drop 2

Attachment:  
As stated

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cc: See next page

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JUN 27 1978

Ronald L. Ballard

-2-

cc: B. J. Youngblood  
R. P. Geckler  
M. Kaltman

Distribution

Dockets  
ET Reading  
CBAB Reading  
DPCleary

OFFICE	DSE:ET:CBAB	DSE:ET:CBAB				
SURNAME	<i>M. Kaltman</i> M. Kaltman:c1c	<i>DPC</i> DPCleary				
DATE	6/27/78	6/27/78				

USDOJ (#25)

Since various recreation facilities, parks and historic sites are located within fifteen miles of the cooling towers, the impacts could best be discussed by proceeding radially outward from the cooling towers and identifying each park, recreation area, or historic site with an evaluation of visual impacts in each case. This would provide a better appraisal of the aesthetic impact of the cooling towers on recreational areas and historic sites than is now evident from the draft statement.

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The staff listed historic resources within the viewshed had of the proposed natural draft towers and concluded that "any visual impacts on the sites listed above will not cause any change in the quality of their characteristics that qualifies them under the National Register criteria" (Section 6.3.1.8). In Section 6.3.1.7 the staff compiled a list of recreational facilities within 15 miles of the site. The staff concluded in Section 6.3.3.3 that for "the IP area generally, the staff believes, of the three lowest cost alternatives, the CMDCT presents less of a visual intrusion and, therefore, is aesthetically preferred."

The staff agrees with DOI that a radial procedure with an identification at each site would provide a better appraisal of the aesthetic impact at each recreational area and historic site. However, as the staff's objective was the analysis of cooling tower alternatives in a generic framework, the staff's methodology was deemed sufficient.

City of Peekskill (#69)

Whereas, this council is particularly mindful and concerned as to the impact of these proposed structures upon the Peekskill Riverfront Green (Con Edison's neighbor to the North) in which this City as well as the State and Federal Governments have made so much of a contribution in order to preserve the natural beauty and recreational potential of this magnificent and historic area.

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I believe my response dated February 27, 1978 to the City of Peekskill Common Council and to DHUD adequately covers the basic issues.

PASNY (#114, 126, 130)

S 6.2.2.2.a. Taxes should not be included in calculating Power Authority costs of cooling tower system construction, as the Authority is exempt from Federal, State and local taxation.

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This issue had been answered as item 82.

Village of Buchanan (#143)

The Village of Buchanan is further concerned from an aesthetic point of view that they would pose an unsightly appearance in these very predominantly residential areas of the Villages of Buchanan, Croton-on-Hudson, Montrose, and the City of Peekskill.

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The evaluation of aesthetics and visual intrusion has been dealt with in Section 6.3.3.3 of the DES and in our responses to comments from the City of Peekskill Planning Commission and the U.S. Department of Housing and Urban Development.

Village of Buchanan (#144)

The one other factor that the Mayor and the Board of Trustees are raising with respect to the construction of these towers is the effect that it would have with respect to the large amounts of money that would be paid for the construction of these towers and their upkeep and the eventuality that the cost of these towers and their upkeep would have to be borne by the public at large and they are already burdened by many taxes and also high utility costs at the present time.

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Table 6-17B of the staff's DES indicates that the NDCT alternative costs less to build and operate than any other cooling tower alternative considered.

New York State Parks and Recreation (#146)

Our office confirms previous statements and testimony provided by representatives from the Palisades Interstate Park Commission that the combined visual impact of cooling towers proposed to service IP-2 and 3 power facilities represents an environmental insult of considerable magnitude to the natural beauty of the Hudson River Valley. This applies also to parks, scenic roads and trailways on the eastern side of the Hudson River, particularly the views from Hudson Highland State Park (Taconic State Park Commission). Among the factors contributing to the value of large tracts of open space associated

with trails and scenic overlooks is relative freedom from features significantly disruptive to the natural and the scenic setting of a region. The design and specifications of the natural draft cooling towers proposed for use at Indian Point are indicative of such disruptive features.

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The staff evaluation of the impact of cooling towers on the human environment considered the issue of aesthetics--see Section 6.3.3.3 and Figure 6-1. As a result of this consideration, the staff concluded that the NDCT was the most visually intrusive and least aesthetically preferred of the closed cycle cooling systems. However, considering other environmental consequences and cost implications, the staff concluded that it could not find a basis upon which to change the applicant's preferred system.