

JUN 19 1978

Docket Nos.: 50-286

MEMORANDUM FOR: R. Ballard, Chief, Environmental Projects Branch No. 1

FROM: J. T. Collins, Chief, Effluent Treatment Systems Branch, DSE

SUBJECT: RESPONSE TO AGENCY COMMENTS FOR THE DRAFT ENVIRONMENTAL STATEMENT OF INDIAN POINT, UNIT NO. 3

PLANT NAME: Indian Point, Unit No. 3
 LICENSING STAGE: Post-OL
 DOCKET NUMBERS: 50-286
 MILESTONE NUMBER: 36-01
 RESPONSIBLE BRANCH: EP-1
 PROJECT MANAGER: R. Geckler
 DESCRIPTION OF RESPONSE: Response to Agency Comments
 REQUESTED COMPLETION DATE: June 15, 1978
 REVIEW STATUS: Complete

Enclosed are the Effluent Treatment Systems Branch response to agency comments on radioactive releases contained in the DES for selection of the preferred closed cycle cooling system at Indian Point, Unit No. 3.

ORIGINAL SIGNED BY
 J. T. COLLINS

John T. Collins, Chief
 Effluent Treatment Systems Branch
 Division of Site Safety and
 Environmental Analysis, NRR

Enclosure:
 Response to Agency Comments

cc: V. Stello
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 (con't)

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R. Ballard

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cc: (con't)
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EFFLUENT TREATMENT SYSTEMS BRANCH
RESPONSE TO AGENCY COMMENTS
INDIAN POINT UNIT NO. 3
DOCKET NO. 50-286

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Comment:

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.

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 those in 10 CFR 20.

POWER AUTHORITY OF THE STATE OF NEW YORK

Comment:

Section 5.5.1. The discussion of anticipated liquid releases and their anticipated radiological impact from the Indian Point reactors is based on outdated models and calculational techniques. This section of the DES should be updated and revised to reflect the most recent models utilized. A detailed discussion of these models and the calculated results can be found in "An Evaluation to Demonstrate the Compliance of the Indian Point Reactors with the Design Objectives of 10 CFR Part 50, Appendix I", which was filed with the Commission on March 14, 1977.

Response:

In order to determine conformance with 10 CFR Part 50.34a and Appendix I to 10 CFR Part 50, the staff is presently evaluating the radioactive waste treatment systems installed at the Indian Point Station. This review will include the information presented in the licensee's submittal of March 14, 1978, "An Evaluation to Demonstrate the Compliance of the Indian Point Reactors with the Design Objectives of 10 CFR Part 50, Appendix I, " and will address the concerns discussed in these two comments. Staff review is expected to be completed during the summer of 1978.