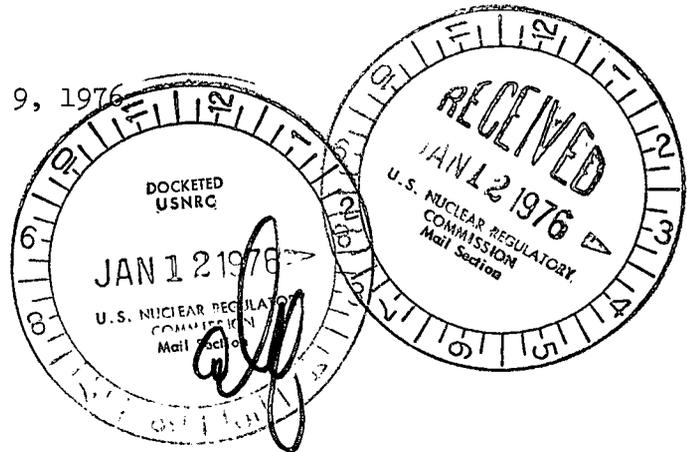


TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

January 9, 1976

Mr. Benard C. Rusche, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555



Dear Mr. Rusche:

In the Matter of the) Docket Nos. 50-438
Tennessee Valley Authority) 50-439

The purpose of this letter is to request removal of a certain condition from the Bellefonte Nuclear Plant construction permit. Item 3.D.(3) of construction permit Nos. CPPR-122 and CPPR-123 is a condition which requires that TVA not use the broadcast application of herbicides on the right of way covered under step one (section 3.3, Staff Final Environmental Statement) of the transmission line construction plan, and that TVA conduct studies to assess the impacts and costs associated with various methods of transmission line construction and maintenance and submit for staff evaluation the results of the studies and an updated version of TVA's proposed clearing and maintenance methods for staff approval before construction of additional lines.

Because of the scheduled in-service date of the Bellefonte units, the need to have the transmission lines available before plant operation, and the length of time required to complete the subject studies, we believe that implementation of the subject condition is impractical and will result in delaying operation of the Bellefonte project. Furthermore, since there is now available adequate information to evaluate the impacts and costs of the various transmission line construction and maintenance practices in question, the studies are unnecessary.

In keeping with the commitments made by TVA in the environmental review process, studies have been initiated to provide additional information regarding transmission line right-of-way clearance and maintenance practices. In order to complete these studies and estimate the actual cost differences between shear clearing and selective clearing, the time span for the studies must cover at least one full maintenance cycle on a shear-cleared right of way. The determining factor in the

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time requirement for completing these studies is the time interval between the initial clearing and the need to reclear the shear-cleared portion of the Widows Creek-Guntersville 500-kV transmission line right of way. The seeding of this right of way is scheduled for the spring or fall of 1976, and reclearing is expected to occur in the spring or summer of 1980 or 1981. Consequently, completed cost information of the different construction and maintenance practices cannot be determined until that time.

The construction of the transmission lines designated in steps two and three of section 3.3 of the Staff Final Environmental Statement for the Bellefonte plant is expected to begin in the late summer of 1977 for the Widows Creek-Scottsboro 161-kV loop in lines; early spring of 1978 for the Widows Creek-Madison 500-kV loop in lines; and summer of 1979 for the Widows Creek-Guntersville 500-kV loop in lines. This schedule has been set up to meet the required in-service dates of June 1978; March 1979; and January 1980, respectively, for the above transmission lines. These in-service dates are necessary to allow an orderly preoperational testing and checkout of critical plant components and systems before initial fuel loading.

As illustrated by the above schedule and the enclosed Figure 1, the required in-service date for the last line necessary for operation of the second unit of the Bellefonte plant is before the earliest date that the studies required by condition 3.D.(3) could be completed. The other lines for the plant are needed on earlier dates, and additional lead time is necessary in order to construct the lines. Additional time would also be required after the completion of the study in order to analyze the collected data, to determine if an alternative clearing and maintenance method should be adopted, to develop a plan for an alternate method if one is necessary, and to submit the data and a plan for the clearing and maintenance method to NRC for review and approval. Thus, compliance with the subject condition would result in an extensive delay in the availability of the required transmission lines and, consequently, a delay in plant operation.

TVA has engaged in extensive consultations with outside experts to determine the environmental impacts and costs associated with the various clearing and maintenance techniques. As a result, we have determined that there are no significant unacceptable or irreversible environmental impacts associated with the complete clearing of transmission line rights of way (shear clearing). Our studies and consultations have also revealed

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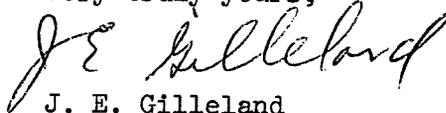
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that the costs associated with the use of selective clearing techniques in the initial clearing of rights of way will be substantially higher than those associated with shear clearing. It appears that initial clearing by selective methods would increase initial clearing cost on the order of three to four times as much as the complete or shear-clearing method.

Based on TVA's experience with shear-clearing techniques, it is anticipated that our initial clearing costs would increase by about \$800 per acre resulting in a total expenditure of about \$1,200 per acre of transmission line right of way. Information received from other utilities and clearing contractors substantiates TVA's cost figures. In fact, in some instances the private sector has experienced cost increases for selective clearing in the \$1,900- to \$3,000-per-acre range. In addition, when rights of way have been selectively cleared, TVA has found that the costs associated with conductor installation almost double compared to the costs associated with completely cleared rights of way. Maintenance reclearing costs will also increase substantially.

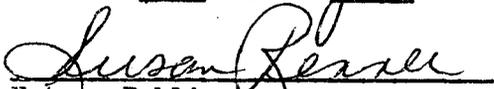
In summary, (1) the time required to complete, to analyze, to develop the required plan for clearing and maintaining a right of way, and to submit data and the plan to NRC for review and approval would extend beyond the time when the transmission lines would be needed; (2) no significant adverse environmental impacts of an unacceptable or irreversible nature associated with the methods by which TVA now clears and maintains its transmission line rights of way have been identified by TVA or any organization reviewing TVA's practices for constructing and maintaining transmission line rights of way; and (3) costs for constructing and maintaining a transmission line utilizing selective clearing techniques on the right of way would be substantially higher than those incurred by utilizing TVA's present methods. In view of these facts and the potential for significant delay in plant operation, TVA considers condition 3.D.(3) contained in the Bellefonte construction permits to be unnecessary and unwarranted. Accordingly, TVA requests that the construction permits be modified to remove condition 3.D.(3).

Very truly yours,



J. E. Gilleland
Assistant Manager of Power

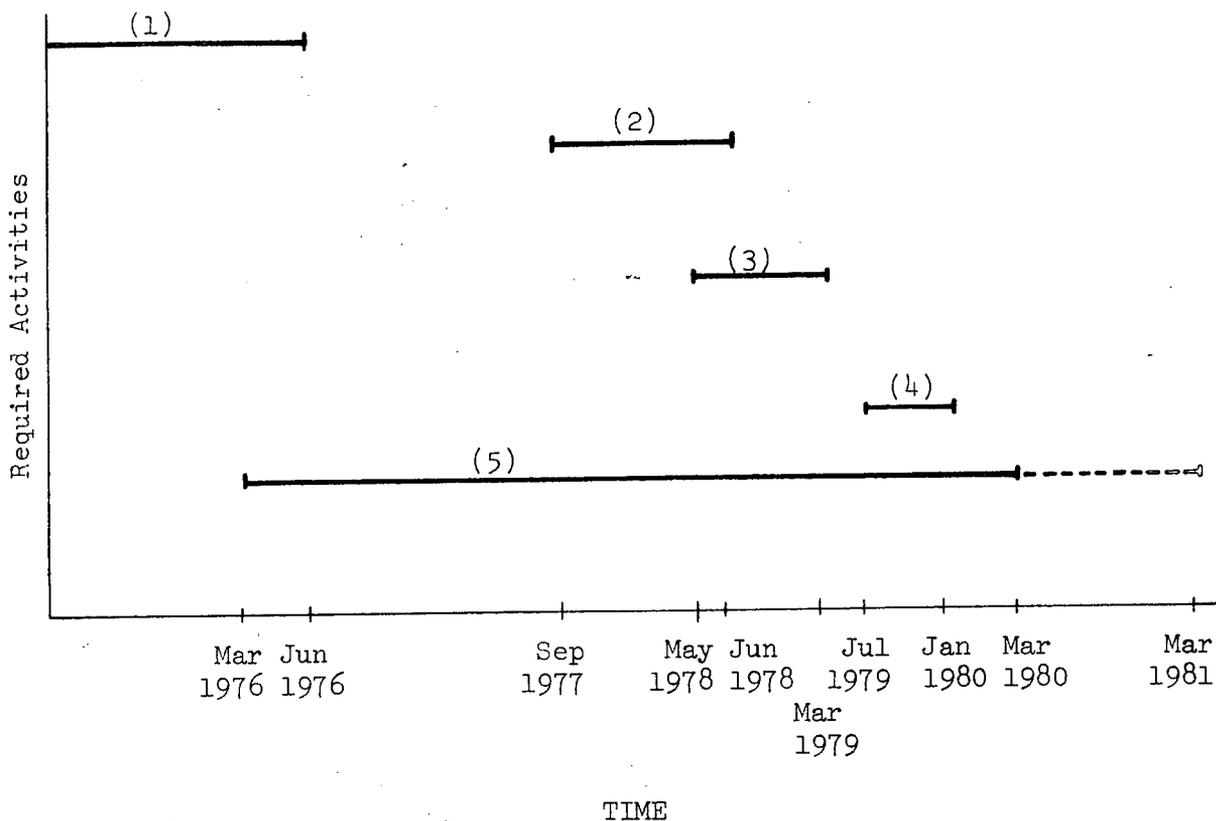
Sworn to and subscribed before me this 9th day of Jan 1976


Notary Public

My commission expires 10/10/78

Enclosure

Figure 1



- (1) Time required to construct Widows Creek-Guntersville 500kV transmission line to meet required in service date.
- (2) Time required to construct loop to Bellefonte Plant from the Widows Creek-Scottsboro 161 kV transmission line to meet required in service date.
- (3) Time required to construct loop to Bellefonte plant from the Widows Creek-Madison 500 kV transmission line to meet required in service date.
- (4) Time required to construct loop to Bellefonte plant from the Widows Creek-Guntersville 500 kV transmission line to meet required in service date.
- (5) Time expected to be required to complete one reclearing cycle on the shear cleared study area of the Widows Creek-Guntersville 500 kV transmission line.

Note: At the end of step 5, an unknown amount of time would be required to (1) analyze data, (2) develop plan of clearing and maintenance practices, (3) submit data and plan to NRC, and (4) wait for review and approval of NRC.