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DESCRIPTION:
Ltr re our 2-1-74 ltr.....furnishing comments on the Draft Enviro Impact Statement for the Bellefonte Units 1 & 2.....

ENCLOSURES:

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Washington, D.C. 20230

March 19, 1974

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MAR 22 1974
U.S. ATOMIC ENERGY COMMISSION
Regulatory
Mail Section

50-438/439

Mr. Daniel R. Muller
Assistant Director for Environmental
Projects
Directorate of Licensing
Atomic Energy Commission
Washington, D. C. 20545

Dear Mr. Muller:

The draft environmental impact statement for the Bellefonte Nuclear Plant, Tennessee Valley Authority, Docket Numbers 50-438 and 50-439, which accompanied your letter of February 1, 1974, has been reviewed by the Department of Commerce and the following comments are offered for your consideration.

It does not appear that the noble gases eventually released to the atmosphere from the gaseous waste system is on a continuous basis as is implied by table 3.3 and by the use of an average annual relative concentration factor. According to the description of the waste system on page 3-11 the gases will be pumped into one of two 3000 $ft.^3$ tanks where they will be held for at least 60 days for radioactive decay. Then they will be released to the atmosphere "at a controlled rate" according to the staff. We assume that the controlled rate will be over a relatively short time compared to a year, since only 2 tanks are available, one for filling while the other is held for radioactive decay. Consequently, since the waste gas system processes over half the noble gases released to the atmosphere, we think the total body and skin annual doses are incorrectly computed as listed in table 5.4.

Executive Order 11507 was superseded on December 17, 1973, by Executive Order 11752. The footnote referring to this Executive Order should be corrected as well as the statement on page 1-2.

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Thank you for giving us an opportunity to provide these comments, which we hope will be of assistance to you. We would appreciate receiving a copy of the final statement.

Sincerely,

Sidney R. Galler

Sidney R. Galler
Deputy Assistant Secretary
for Environmental Affairs