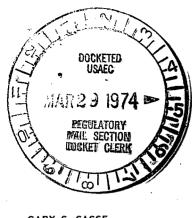
AEC DISTRIBUTION FOR PART 50 DOCKET MATERIAL (TEMPORARY FORM)

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STATE OF TENNESSEE OFFICE OF URBAN AND FEDERAL AFFAIRS

SUITE 1312

ANDREW JACKSON STATE OFFICE BUILDING
NASHVILLE 37219

March 25, 1974.



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

50-438 50-439

Re: Environmental Impact Statement by the U. S. Atomic Energy Commission Related to Proposed TVA Bellefonte Nuclear Plant

Dear Mr. Muller:

In conformance with guideline procedures stipulated in OMB Circular A-95 and in accordance with the Governor's Executive Order 6, designating the Office Of Urban and Federal Affairs as the State Clearinghouse for Federal grant programs, we have reviewed your draft environmental statement on the above mentioned proposed project (Jackson County, Alabama, 43 miles upstream of Guntersville Dam in Guntersville Reservoir).

Our evaluation of submitted materials identified no conflicts with existing or planned State activities. However, we are attaching comments received from the Tennessee Department of Public Health concerning several inaccuracies and discrepancies referred to in the statement as they relate to local environmental effects. We encourage you to consider these comments prior to finalization of the statement to insure accuracy and consistency.

If our office, as the State Clearinghouse, can be of further assistance, please do not hesitate to contact us.

Sincerely,

Suzanne M. Bentley

Grant Review Coordinator

DEPARTMENT OF PUBLIC HEALTH

CORRESPONDENCE

DATE:

March 18, 1974

TO:

David Booth

FROM:

Bill Graham

SUBJECT:

As requested in your memo dated February 11, 1974, the following will detail our comments on the Draft Environmental Statement as prepared by AEC on Bellefonte Nuclear Plant.

PROM

IRH

EHS

Page 3-11

We question the statement found in paragraph 1, "Based upon our evaluation, the radioactivity in the liquid effluent from units 1 and 2 exclusive of tritium will be less than 5 curies/year..." Table 3.2 on page 2 shows that the calculated annual radionuclide release in liquid waste, per unit, exclusive of tritium to be 0.1 Ci/yr. Also this figure of 0.1 Ci/yr was normalized from 0.03 Ci/yr on page 3-9. Thus, the total effluent from both units as derived from Table 3.2 equal 0.2 Ci/yr. Our question is this. Why overstate the problem by saying that the effluent release will be less than 5 Ci/yr when it will actually be less than 1 Ci/yr?

2. Page 3-15 Table 3.3

It was impossible for us to determine from table 3.3 the calculated annual release of radioactive materials in gaseous effluents as many of the totals shown appear to be grossly incorrect. The most apparent inaccuracies are noted in the following:

58 3//8 38 3//8	Item	Total Shown	Correct Total
DHB Mis	Total for Kr-85 Total for Xe-133 Total for auxiliary Total for air ejector	$ \begin{array}{c} 1.8 \times 10^{3} \\ 1.3 \times 10^{3} \\ 600 \\ 600 \end{array} $	1017 400 122 122

In addition, as the footnote denotes that (0) indicates release is less than 10^{-20} Ci/yr, all releases therefore noted in the table, even though minute, become significant and should be included in the totals.

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DEPARTMENT OF DELIC HEALTH CORRESPONDENCE FROM TO DATE DATE FROM TO DATE TO DAT

.3. Page 3-14

FROM:

SUBJECT:

There is considerable difference in AEC and TVA estimates of solid waste to be shipped from the reactor site each year.

	Spent :	resins	Evaporator b	ottoms	waste	- · :
TVA estimate	3100	ft ³	1920 f	±3	-4900 ft	 -3
AEC estimate	4000	ft ³	2941 f	±3	8820 ft	<u>-</u> 3

Also large differences are noted between AEC and TVA estimates of curies of material leaving the plant as solid waste each year.

	Spent	resins	• .	Evaporate	or bottoms	Misc. dry
				•	•	waste
estimate estimate*	1550 10,000	Ci/yr [:] Ci/yr			Ci/yr Ci/yr	50 Ci/yr 5 Ci/yr

* After 180 days decay

No explanation is given for the wide variations in estimates. As can be noted some of the variations are extremely large.

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4. Page 5-7

Under Section 5.3.1.2 reference is made to Section 3.5 "The basis for these values is discussed in Section 3.5". There appears to be no section 3.5 in this document.

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