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<b>FROM:</b> Department of the Interior Washington, D. C. 20240 W. W. Lyons		<b>DATE OF DOC:</b> 4-16-73	<b>DATE REC'D</b> 4-17-73	<b>LTR</b> x	<b>MEMO</b>	<b>RPT</b>	<b>OTHER</b>
<b>TO:</b> D. R. Muller		<b>ORIG</b> 1 signed	<b>CC</b> 1	<b>OTHER</b>	<b>SENT AEC PDR</b> X <b>SENT LOCAL PDR</b> X		
<b>CLASS:</b> <del>10</del> PROP INFO		<b>INPUT</b>	<b>NO CYS REC'D</b> 2	<b>DOCKET NO:</b> 50-331			

**DESCRIPTION:**

Ltr re our 3-12-73 ltr...furnishing comments on Final Enviro Statement .....

**ENCLOSURES:**

**PLANT NAMES:** Duane Arnold

**ACKNOWLEDGED DO NOT REMOVE**

**FOR ACTION/INFORMATION 4-17-73 fod**

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16-CYS ACFS HOLDING	1- GERLAD ULRIKSON....ORNL	1- RD...MULLER...F-309GT



# United States Department of the Interior

50-331

OFFICE OF THE SECRETARY  
WASHINGTON, D.C. 20240

In reply refer to:  
PEP ER-72/1342

APR 16 1973



Dear Mr. Muller:

This is in response to your letter of March 12, 1973, which transmitted the Atomic Energy Commission's final statement, dated March 1973, on environmental considerations for Duane Arnold Energy Center, Linn County, Iowa.

There are several significant concerns which we expressed in our comments of February 5, 1973, on the draft statement which were not adequately addressed in the final statement. These major concerns are presented again for your information and appropriate action.

## Effect on Land Use

Our comments on the draft environmental impact statement expressed concern for the lack of a land use plan which would enhance the indigenous wildlife populations and aesthetic appeal of the site. We suggested that the applicant contact State and local planning authorities to determine the type of facilities that could be developed to serve the recreational needs of the area.

The Iowa Conservation Commission in its letter of December 22, 1972, offered the services of its wildlife managers to the applicant for the purposes of maximizing the overall land use benefits in the interest of wildlife, recreation, and other uses. However, the final statement indicates on page 11-1 that access to the river at the site was restricted by private ownership in the past and will remain so. Further, the final impact statement does not reflect any comprehensive land use planning for the approximately 500 acres withdrawn from its previous uses.

We suggest that, since only about 40 of the 500 acres will be occupied by buildings and roads, the operating license should contain a condition that the applicant will prepare a land use plan in consultation with appropriate State and local agencies that would provide public benefits on the remaining 460 acres.

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Pleasant Creek Reservoir

We are extremely concerned with the final impact statement's treatment of the proposed Pleasant Creek Reservoir makeup water storage system in that the reservoir is not treated as an integral part of the licensing action of the plant. Instead, as indicated on page 12-2, AEC assumes the reservoir will be built and managed by the Iowa State Conservation Commission and is justified primarily as a recreation resource. Also, the Iowa State Conservation Commission has commented, by letter dated December 22, 1972, that the Pleasant Creek Project will be covered by a separate Environmental Impact Statement to be prepared the Bureau of Outdoor Recreation of this Department.

We want to make it clear that we have not received a formal project proposal from the State or any communications from the applicant in regard to the reservoir.

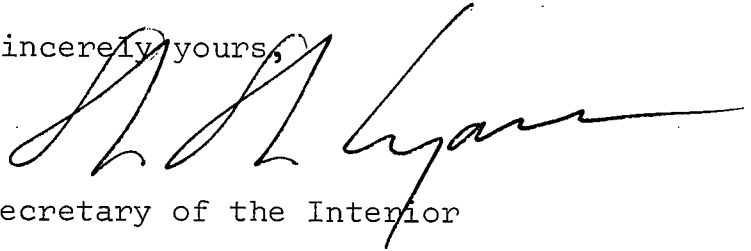
As we understand the project, the reservoir would be located and operated to benefit the applicant who would have first right to water drawdown. If this is the case and recreation is a secondary use of the reservoir, our policy will not permit use of Land and Water Conservation Funds for reservoir construction.

The first paragraph on page 10-3 is somewhat misleading. It is stated that the cost of the reservoir is the same as that of the deep wells, since the applicant is giving a sum equal to the cost of deep wells to the State Conservation Commission. Perhaps the cost to the applicant would be the same, but we have been informed by the Iowa Conservation Commission that the land acquisition and pumping station, would cost approximately \$2,800,000. This does not include recreation developments. It appears unlikely that the project would have been conceived and constructed without the applicant's participation.

It is our opinion that the applicant is responsible for the makeup water system since it is an integral part of the proposed project. Therefore, we feel that the final environmental impact statement is grossly lacking in its description of the impacts of the reservoir portion of the project.

We hope these comments will be useful to you.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "D. L. Lyman", is written over the typed name and title.

Deputy Assistant Secretary of the Interior

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

Regulatory

File Cy.

