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DESCRIPTION: Ltr furnishing comments on draft detailed statement for Monticello Plant....

ENCLOSURES:

PLANT NAMES: Monticello Plant

ACKNOWLEDGED
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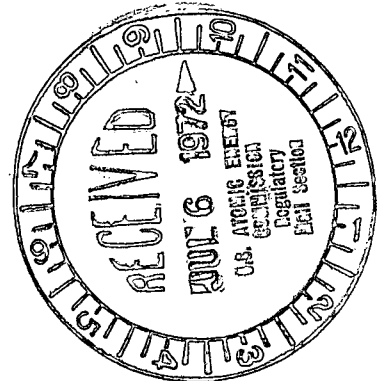
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NSP

NORTHERN STATES POWER COMPANY

July 3, 1972

Deputy Director for Reactor Projects
Directorate of Licensing
U. S. Atomic Energy Commission
Washington, D. C. 20545



Gentlemen:

MONTICELLO NUCLEAR GENERATING PLANT E-5979
Docket No. 50-263
Comments on Draft Environmental Statement

We have reviewed the Draft Environmental Statement for our Monticello Plant recently issued by your office. We find the tone of the statement very favorable and the environmental impacts are placed in good perspective. However, pursuant to the comment opportunity afforded in the Notice of Availability published in the Federal Register of June 2, 1972, we are conveying one major comment and two minor comments in the following paragraphs.

In the Draft Environmental Statement, page iii, paragraph 6 (c), it is recommended:

"The applicant should take appropriate actions as necessary to assure that the release of radioiodine to the atmosphere meets the requirements of the proposed Appendix I, 10 CFR 50, as formalized."

We have analyzed the estimated release of radioiodine to the atmosphere based on realistic assumptions and conclude that the resulting dose levels will be less than those proposed in Appendix I. The large discrepancy between our estimates based on operating experience, and the AEC's estimates, results from the conservative approach used by the AEC.

We are continuing to perform a comprehensive environmental surveillance program in cooperation with the Minnesota Department of Health. This program includes the monitoring of radioiodine releases to the atmosphere, the monitoring of ^{131}I airborne concentrations and ^{131}I raw milk concentrations within a ten mile radius of the plant. The results of these monitoring programs substantiate our estimates of radioiodine doses. The continuing environmental surveillance program will assure our compliance with the requirements of proposed Appendix I.

Our analysis of the effect of radioiodine releases is based upon realistic assumptions, supported by operating experience, that are different from the assumptions appearing in Table III-3, page III-16 of the Draft Environmental Statement. In particular our analysis utilizes an average off-gas stack release rate of 25,000 $\mu\text{Ci}/\text{sec}$ (after 30 minute hold-up) as contrasted with the AEC off-gas rate of 44,000 $\mu\text{Ci}/\text{sec}$ (Based upon a 100,000 $\mu\text{Ci}/\text{sec}$ release for a 3,400 mWt reactor). The 25,000 $\mu\text{Ci}/\text{sec}$ average release rate was utilized in the Monticello

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Environmental Report, page II-18, and is consistent with existing and expected plant operating experience.

In addition to the lower off-gas rate, we have utilized a primary system steam leakage rate of 240 pounds per hour (lb/hr) instead of the 2,400 lb/hr leak rate listed in Table III-3 of the Draft Environmental Statement. This 240 pound per hour leakage is based on a 10% steam component of the turbine building leak rate of 2,400 lb/hr total water, projected by the plant vendor. This leak rate estimate is supported by operating data concerning measured iodine releases as presented in our Six Month Operating Reports.

Based on the 240 lb/hr primary system steam leak rate, the 25,000 uCi/sec off-gas release rate, and utilizing the other AEC assumptions in Table III-3, we estimate a thyroid dose rate to an infant drinking milk from a cow located at the nearby farm (reference on page V-28 of the Draft Environmental Statement) would be less than the 5 mrem/yr guideline set forth in Appendix I. This dose rate is contrasted with the calculated 67 mrem/yr dose presented on page V-28 of the Draft Environmental Statement. In actuality there are no dairy cows located at the nearby farm mentioned above and current field investigations show that the nearest dairy farm is located 1.5 miles northwest of the plant. A similar computation for this farm location would yield a much further reduced thyroid dose rate.

On page III-7 (paragraph 2) of the Draft Environmental Statement it is indicated that "NSP has made a commitment to the MPCA to operate the cooling towers to the maximum extent practical." In a recently formalized commitment, NSP has agreed to operate the cooling tower system in a helper mode when the ambient river temperature upstream of the intake consistently exceeds 68°F and the helper mode will be discontinued when the river temperature drops below 68°F.

On page XI-6 (paragraph 4) of the Draft Environmental Statement it is indicated that the cost of the plant off-gas modifications will exceed \$3,000,000. Currently we estimate the cost of these additional facilities to be in excess of \$4,500,000.

We trust the above comments will be taken into account in preparation of the Final Environmental Statement.

Yours very truly,



E C Ward, Director
Engineering Vice Presidential Staff

CC Gerald Charnoff
Donald E Nelson

Regulatory

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