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Mr. Muller	1			

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DESCRIPTION:
Ltr furnishing comments on Draft Enviro Statement for the Monticello Nuclear Generating Plant.....

ENCLOSURES:

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PLANT NAMES: Monticello

FOR ACTION/INFORMATION 9-11-72 AB

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STATE OF MINNESOTA
DEPARTMENT OF NATURAL RESOURCES
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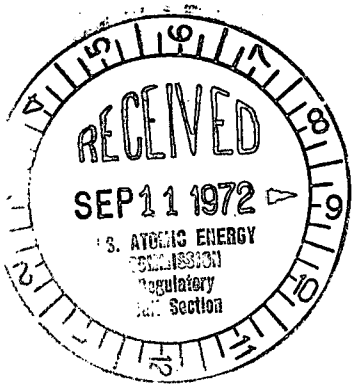
50-263

August 23, 1972



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

Dear Mr. Muller:

The Divisions within our Minnesota Department of Natural Resources have reviewed the contents of the draft Environmental Impact Statement on the Monticello Nuclear Generating Plant and we offer the following comments and recommendations:

On page V-20, it is stated that "many of the species of fish in the river are classed as warm-water fish, with relatively high thermal tolerance." This may be true of the fishes in the river in general but is not true of the major game fish species, such as the smallmouth bass and walleye, which prefer cool water.

On pages V-20 and V-22, the report indicates that the preferred temperatures of smallmouth bass, bluegill and carp are 82° F, 90° F, and 90° F respectively. These preferences apparently were based on laboratory studies and would not apply to this river situation. Field studies, elsewhere, indicate that the preferred temperatures for these species in this area would more likely be in the order of 70° F, 80° F, and 80° F respectively. We would prefer to maintain suitable temperatures for the important game fish rather than for carp.

Temperature preference of fishes are related to the environment in which they happen to live and to which they have become acclimated. Fish generally seek preferred temperatures which are several degrees below temperatures that are lethal. Great care should be exercised in interpreting temperature requirements from various studies and applying these data to a specific field situation, such as the Mississippi River at Monticello. A temperature rise, for example, can increase the lethal effect of toxic substances in the river to fish (synergistic action). The kinds and amounts of pollutants added to the river above and at the Monticello plant will alter the effects of higher temperatures on fish.

As noted in the report on page V-22, since no mixing zone (to which the permissible temperatures in the river are related) has been set, the maximum river temperature which may result from plant operation is now uncontrolled. Until a definite mixing zone is established or effluent standards applied to the discharge, there really are no temperature standards.

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No mention is made in the report about the so-called fish basket, which removes trash and debris from the traveling screen back-flush water before it is returned to the river. The basket also removes any fish that may be entrained in that water. We understand that this is no longer in use but would like to know that the fish basket has been permanently discarded.

Another concern of ours is the extensive posting ("Keep Off" signs) on both banks of the river and the islands, both above and below the plant. No doubt this posting involves plant security, but the excessive amount of posting detracts from fishing, canoeing and boating in the area and will in the long run, we feel, do NSP more harm than good.

A permit from the Department (P.A. 66-11725) has been issued for the plant with accompanying provisions to be followed. As long as compliance is made with the conditions of the permit and due consideration is given to the recommendations above, the Department will have no additional comments at this time.

Sincerely,

Jerome H. Kuehn
Administrator
Bureau of Planning

BPH:daf

cc: Archie D. Chelseth
Oliver Jarvenpa
Larry Seymour

Regulatory File Cy.