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DESCRIPTION:

Ltr re our 4-23-73 ltr...furnishing comments on draft environmental impact statement...

ENCLOSURES:

ACKNOWLEDGED
DO NOT REMOVE

PLANT NAMES: H. B. Robinson

FOR ACTION/INFORMATION 6-7-73 LB

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OFFICE OF THE ASSISTANT SECRETARY OF COMMERCE
Washington, D.C. 20230

June 5, 1973

50-261



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 draft environmental impact statement for "H. B. Robinson Nuclear Steam-Electric Plant, Unit No. 2, Docket No. 50-261", which accompanied your letter of April 23, 1973, has been received by the Department of Commerce for review and comment.

The statement has been reviewed and the following comments are offered for your consideration:

COST/BENEFIT

Our criticism with regard to areas with which we ordinarily are most concerned is that the cost/benefit summary falls short of the degree of quantification often seen in statements of this type. Of particular note is the fact that 5×10^9 KWh of electrical energy are generated annually and by the
Year

close of the year 1972, 7×10^9 KWh of output-corresponding to 10^4 hours of full-power operation-were provided by the station, yet no annual revenue value for the electrical energy generated is provided by the statement.

EFFLUENT LIMITS

The expected liquid radioactive effluents from this plant are detailed in Section 3.5.1, and the gaseous effluents in Section 3.5.2. For liquids, the expected effluents are approximately 30 Ci per year, of which 29 Ci per year results from the steam generator blowdown. Similarly, the major release of the halogen, I-131, in the gaseous effluent is from the blowdown tank vent.

In both cases cited above the expected releases are greater than allowed by the Technical Specification for operation of this power station, and are greater than proposed Appendix I of 10 CFR part 50.

It is noted that the major source of both liquid and gaseous effluent releases of major concern are directly related to the steam generator blowdown and the associated blowdown tank vent. Correction of this particular source of radioactive effluents has been required and carried out on several other, similar nuclear power stations.

As stated by the Atomic Energy Commission staff in their general discussion of radioactive waste (Section 3.5), "Our calculated effluents are also different from the early operating experience of the plant in that the plant operating conditions experienced to date were not considered typical of those expected over the plant life". The above statement clearly refers to the fact that this plant has not yet developed a primary-to-secondary steam generator leak corresponding to the assumed 20 gpm leak estimated by the Atomic Energy Commission staff. However, the experience on existing nuclear plants indicates that such a leak should be assumed for estimating radioactive effluents to the environment. This past experience is the basis for the assumed conditions given in Table 3.4 and used by the Atomic Energy Commission staff in estimating radioactive effluents.

Despite the above discussion only the most general type of discussion of waste handling alternatives is contained in the draft statement, with no specific discussion concerning the alternatives which would treat radioactive effluents associated with steam generator blowdown.

The Summary and Conclusion sections of the draft statement contain no recommendations for action regarding the above points.

In view of the above discussion, it is felt that the draft environmental impact statement is deficient in this respect, and that a specific program for treatment of the steam generator blowdown and associated blowdown tank vent to reduce radioactive effluents be required.

DISPERSION

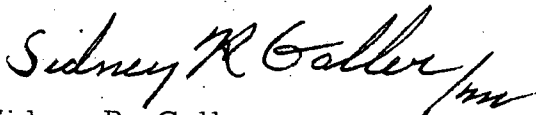
The gaseous wastes described in Section 3.5.2 and schematically shown in Figure 3.14 are released to the atmosphere through a plant vent whose top

is below the containment dome. We would consider this to be a ground release with appropriate credit given for building wake diffusion effects. Consequently, we do not think the use of winds measured at 120 feet, without modification to an effective height of 30 feet, is appropriate. Also, it is not clear by what means the staff reduces an observational frequency of 9.6 percent calms to 3.7 percent at the 120 foot level. We also have expressed our concern (comments to the Atomic Energy Commission Division of Reactor Licensing dated February 26, 1970) with the use of the wind direction standard deviation technique alone as an indicator of stable conditions, especially in an area with very prevalent inversion frequencies and low wind speeds.

In view of the apparent sporadic release of a significant portion of gaseous wastes to the atmosphere, we question the use of the average annual dispersion factors listed in Table 5.2. For example, containment purge is estimated to occur 4 times per year and the gas processing system has a 27-day holdup period, with no indication of the release periods involved in either case.

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,

A handwritten signature in cursive script, reading "Sidney R. Galler", followed by a horizontal flourish.

Sidney R. Galler
Deputy Assistant Secretary
for Environmental Affairs

Regulatory

File by

