

FROM: U.S. Department of the Interior
 Washington, D. C. 20240
 John R. Quarles, Jr.

DATE OF DOCUMENT: 9-28-70
 DATE RECEIVED: 9-30-70
 NO.: 3128

LTR. MEMO: REPORT: OTHER:

X

TO: Harold L. Price

ORIG.: 1
 OTHER:

ACTION NECESSARY CONCURRENCE
 NO ACTION NECESSARY COMMENT DATE ANSWERED BY:

CLASSIF: U
 POST OFFICE REG. NO:

FILE CODE: 50-269 50-270 50-287

DESCRIPTION: (Must Be Unclassified)
 Ltr re our 7-22-70 ltr...submitting
 Comments on Duke's Enviro Statement
 for Oconee Units 1, 2 & 3.....

REFERRED TO	DATE	RECEIVED BY	DATE
Long/Karas W/4 cys for ACTION	10-12-70	(W/Orig for MATS)(Orig to be returned to 016)	

ENCLOSURES:

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REMARKS:

DeYoung
 E. Price, SLR
 N. Dube
 P. Howe (2)
 Morris/Schroeder

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ACKNOWLEDGED

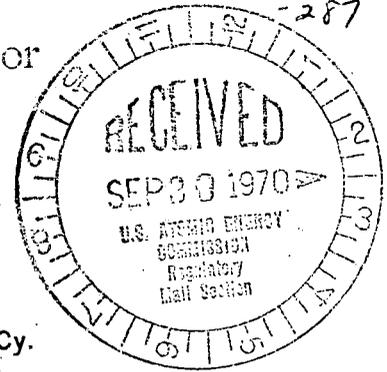
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United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

September 28, 1970



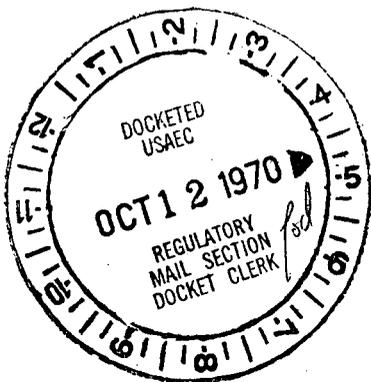
Dear Mr. Price:

Regulatory

File Cy.

This is in response to your letter of July 22, transmitting the draft environmental statement prepared by the Duke Power Company for the Oconee Nuclear Station, Units 1, 2, and 3, AEC Docket Nos. 50-269, 50-270, and 50-287. We have reviewed the statement and other material available on the project and offer the following comments for your consideration.

We are aware of Duke Power Company's efforts to maintain the quality of the environment and their close cooperative work with several of the field offices of this Department. The Company's many studies, consultations and past monitoring programs and the establishment of its Departments of Water Resources Research and Public Health and Sanitation indicate their willingness to promote efforts to prevent or eliminate damage to the environment. However, the environmental statement should contain pertinent information regarding impacts, both short term and long range, of the proposed plant on the site environs. Such a statement should reasonably contain information on predictable and possible detrimental effects, investigations planned or taking place to determine unknown effects, and the backgrounds and capabilities of organizations retained to conduct the investigations. Most important, the statement should be sufficiently comprehensive to permit regulatory and other review agencies to evaluate the environmental impact in light of their own areas of competence. We think Duke Power Company's documents provide a very broad brush treatment of environmental impact and summarize only the applicant's appraisal of the project's potential impact. Thus, we cannot provide a meaningful appraisal of project environmental impact until the documents are substantially expanded.



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We offer the following comments for use in completing the Environmental Impact Statement:

1. Information should be presented on the proposed and alternative facilities and anticipated environmental concentrations of radionuclides in the Keowee River. The concentrations in the Keowee River, though below those required by 10CFR20, appear to be substantially higher than are normally experienced. Levels should be identified both for the proposed and alternative control facilities. Although indicated radioactive wastes in the tailrace may be only 24 percent of the maximum permissible limit, this could be too high when added to other sources of radiation in the area. The capability and cost of equipment which is and which could be provided to limit annual average and short-term radioactivity in the upper reaches of Hartwell Reservoir and especially at the Clemson water intake should be identified as a basis for affirming whether appropriate control has been provided.
2. Information should be presented on the efforts the applicant is making to study thermal effects and prevent negative impact not only in the Reservoir but downstream. Previous studies by Dr. C. J. Velz and a subsequent letter of April 7, 1966, from the then Secretary of Interior Udall to the Federal Power Commission concluded that thermal effects of the proposed Oconee Nuclear Station would "provide no detrimental effects upon the fishery resources." The establishment of the Water Quality Act of 1965 and the publication of the National Technical Committee Report on Water Quality Criteria made it necessary to review these previous comments. Nor is it clear in the present material whether Dr. Velz's 1966 report concerned itself with the entire nuclear megawatt capacity presently planned for the project. Therefore, the environmental statement should contain information that thermal effluents will have no adverse effects on fish, wildlife or other aquatic organisms. The statement should include the possible interactions of several nuclear stations and additional units on the reservoirs under the proposed and alternative waste heat disposal system.
3. Information should be presented on proposed and alternative facilities to prevent the mechanical and/or thermal destruction or damage of fish and other aquatic organisms drawn to or passing through the cooling water intakes.

4. Include a section on proposed and alternative chemical treatment for condenser cleaning and other uses of chemicals which may be used. The section should include a statement on the anticipated effects of the chemicals on the biota and provide assurances that they will not be toxic to the aquatic environment.

5. Present information on the pre- and post-operational water quality monitoring programs now under way or planned for the plant and an evaluation of their effectiveness in appraising the impact of the plant on the environment, particularly as it relates to subsequent recreational and water supply use.

6. Present information on anticipated requirements for waste control facilities as additional units are placed on line.

7. Present information on the visual impact of the Oconee Nuclear Station and other construction and plans to minimize this impact.

In summary, we think the environmental statement is incomplete and should be revised to include the material indicated above. The environmental statement should be a self-contained document.

We appreciate the opportunity of commenting upon this statement.

Sincerely yours,


Assistant to the Secretary
for Policy Planning and Research

Mr. Harold L. Price
Director of Regulation
Atomic Energy Commission
Washington, D. C. 20545