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 FACIL:50-410 Nine Mile Point Nuclear Station, Unit 2, Niagara Moha 05000410
 AUTH.NAME AUTHOR AFFILIATION
 WALKA,R.M. Environmental Protection Agency
 RECIP.NAME RECIPIENT AFFILIATION
 HAUGHERY,M.F. Division of Licensing

SUBJECT: Comments on facility DES,DES does not contain detailed descriptions of radwaste treatment sys or NRC detailed evaluations,Info should be made available for review within time allowed for receiving comments.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II
26 FEDERAL PLAZA
NEW YORK, NEW YORK 10278

50-440

OCT 01 1984

Class: IO-2

Ms. Mary F. Haughey
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Ms. Haughey:

We have reviewed the draft environmental impact statement (EIS) for the operation of the Nine Mile Point Nuclear Station Unit No. 2, located in Oswego County, New York. Based upon this review we do not anticipate any significant adverse environmental impacts associated with the operation of this facility. However, we believe that the draft EIS does not fully address several aspects of radiology, air quality, and groundwater. Comments regarding our concerns are provided below.

Radiological Aspects

The draft EIS does not contain detailed descriptions of the radioactive waste treatment systems or the Nuclear Regulatory Commission (NRC) staff's detailed evaluations. These matters are referenced to the Safety Evaluation Report (SER), which is not scheduled for publication until December of 1984. This information, which has been incorporated into the EIS by reference, should be made available for review within the time allowed for receiving comments. Currently, there is no high-level radioactive waste repository in operation and it is doubtful that one will be available in the near future. Thus, specifications on spent fuel pools, such as volume and methods of stacking, should be addressed.

EPA is interested in the NRC's development of an overall policy for decommissioning commercial nuclear facilities. If future decommissioning actions are taken, EPA would like to receive an assurance that funds will be available when required and that clarity be given on the issue of termination of the licensee's financial responsibilities. A dose assessment of the combined effects of the liquid gaseous effluents from this facility and the nearby Nine Mile Point Unit No. 1 and James A. FitzPatrick Nuclear Power Plants is not addressed and should be provided.

Air Quality

The draft EIS does not adequately address specific emission data for the cooling tower (both particulate and biological). The applicant should be referred to the EPA publication titled, "Effects of Pathogenic and Toxic Materials Transported

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Via Cooling Device Drift, Volumes 1 and 2 (EPA-600/7-79-251 a and b)". Detailed information on the emissions from the stand-by diesel generators, high-pressure core spray generator, and the fire pump has not been provided. This information should include engine size (cubic inches/cylinder and total cubic inches/engine), fuel type, make and model, and maximum fuel capacity (gallon/hour emission factors).

The applicant must estimate annual pollutant emission rates for the auxillary generating equipment to determine if the source will fall under the Prevention of Significant Deterioration (PSD) requirements. We understand the units are purely for emergency situations with estimated use of 18 hours per month. The applicant may have to accept a permit condition to maintain emissions below "de minimis" levels. These levels are defined in the PSD regulation for pollutants commonly emitted by diesel generators. The emission rates can be obtained from the generator vendors and will be for SO₂, NO_x, CO, and particulates, depending on the types of fuels used. The EPA guide to emission rates, AP-42, should be used as a source of reference.

The applicant should substantiate the claim that industrial sources in the area are responsible for total suspended particulate (TSP) secondary standard violations at two of the power plant's monitoring sites. The applicant should analyze the TSP data at each of its monitoring sites and review all violations of the secondary TSP standard (24-hour, second highest monitored value(s); including the meteorological conditions which accompanied these concentrations). This review should also include hourly wind speed, wind direction, and atmospheric stability for the 24 hour period of the violations(s). Please indicate the type(s) of industry located in the vicinity which are responsible for the secondary violations and estimate their impact using dispersion models to demonstrate their associated impacts.

The applicant should summarize all pollutant levels sampled and relate these values to the National Ambient Air Quality Standards (NAAQS). The summary should be addressed on a year-by-year basis for each monitoring site comparing the maximum pollutant levels with the appropriate time period for that pollutant (e.g., 1 hr., 3 hr., 8 hr., 24hr., etc.).

If there are any questions concerning the specific items mentioned above, the applicant should contact Mr. Fran Gombar of EPA's Air Programs Branch at (212) 264-2058.

Groundwater Protection Aspects

The applicant should address the hydraulic head relationships between the unconfined and confined aquifers. The information provided in the draft EIS is unclear concerning this matter. Additional information is also requested on the drawdown by a permanent dewatering system. Water table maps and the amount of the drawdown would be needed to assess the impact of the "minor" cone of depression created in the groundwater table. A detailed plan and a map of monitoring well locations is also needed to assess the travel time for any contaminants to travel through the aquifer to the lake. Additional information should be provided to assess possible contamination of drinking water supplies from radionuclides in the event of a meltdown.



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We thank you for the opportunity to comment and if there are any questions concerning this matter, please feel free to contact Mr. Christopher Militscher of my staff at (212) 264-0522.

Sincerely yours,

Handwritten signature of Richard M. Walka in cursive script, with a horizontal line extending from the end of the signature.

Richard M. Walka, Chief
Environmental Impacts Branch

