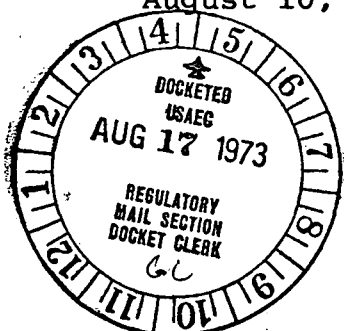




August 10, 1973

Mr. B. J. Youngblood, Chief
Environmental Projects Branch 3
Directorate of Licensing
U.S. Atomic Energy Commission
Washington, D.C. 20545



Subject: Dresden Draft Environmental Statement,
AEC Dkts 50-237 and 50-249

Dear Mr. Youngblood:

We have reviewed the Staff's draft environmental statement concerning Dresden Units 2 and 3. Our comments are attached. In several areas, the Staff has recommended that certain steps be taken to prevent or mitigate possible environmental effects from the operation of these Units. In some, if not all, of these areas including, for example, the prevention of danger due to fog on County Line and Dresden roads, we have already taken action. In such cases, these comments discuss the steps taken. We believe that they will be satisfactory.

In our review of this statement, we have become concerned about the suggestions for environmental technical specifications for two reasons. First, we believe this level of detail is inappropriate in the environmental statement since the development of such specifications requires careful attention to the operating requirements of the plant. In this regard, we would point out that the environmental statement is somewhat similar to the Staff's safety evaluation which does not attempt to incorporate all the matters set forth in the technical specifications and the FSAR. We believe that the Staff's review of Commonwealth Edison's proposed environmental technical specifications, which will be submitted in September of this year, will provide the appropriate opportunity to develop mutually acceptable specifications in those areas where such limitations are actually required and do not duplicate restrictions imposed by other agencies. In addition, we believe it inappropriate to burden the specifications themselves with the level of detail

Commonwealth Edison Company

Mr. B. J. Youngblood

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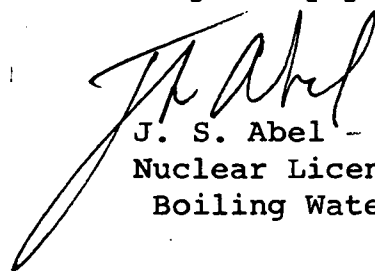
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implied in the draft environmental statement. There are many areas which may be appropriately covered by written procedures to be changed from time to time with changing conditions. Such procedures are, of course, subject to inspection by the Commission's Directorate of Regulatory Operations to insure their presence and adequacy.

I am convinced that the scope of environmental technical specifications can be determined during your review of our proposed technical specifications in a way which satisfies the Commission's concern over undue environmental effects, a concern shared by Commonwealth Edison Company, while allowing our operators necessary flexibility.

In addition to this signed original, 39 copies of these comments are attached.

Very truly yours,



J. S. Abel -

Nuclear Licensing Administrator -
Boiling Water Reactors

COMMONWEALTH EDISON COMPANY
COMMENTS REGARDING AEC DRAFT ENVIRONMENTAL
STATEMENT FOR DRESDEN UNITS 2 AND 3

Page 1

Section 3d

This section implies that all organisms entrained in the cooling water will probably be killed. The statement should be modified to reflect a range of kill of 20% - 50% for entrained organisms is expected. Refer to reports by C.C. Coutant which discuss survival rates. Also refer to Quad Cities Station Semi-Annual Environmental Monitoring Reports submitted to the AEC.

Section 3g

The Applicant presently has a fog detector and warning sign system installed on County Line Road to assure traffic safety during periods of fogging; this system will be maintained during lake and spray operation. The Applicant feels that this scheme is sufficient to cover the concerns of the Staff (See Section 5.1.2 comments).

Section 3h

See comments for Section 5.5.5.

Page ii

Section 7 Conditions for Licensing

Section 7b See Comments on Section 5.1.2

Section 7c See Comments on Section 5.5.3.b

This section outlines a condition for licensing whereby the dike integrity needs further analysis (i.e. additional core borings to define the abandoned coal mine and a demonstration that the 4 in. holes along the south dike are not initial stages of soil movement). The Applicant's Consultant, Sargent and Lundy (S&L), reviewed this condition and concluded that, based on the existing information, dike integrity is assured. The consultant's Memorandum on this subject (From J. Steinbach of S&L to J. H. Ellis of CECO dated July 26, 1973) is included for the Staff's consideration and is attached at the end of the comments on the Summary and conclusions Section. These same comments also apply to Section 5.1.4.d (Page 5-6). The Applicant, therefore, believes no need to proceed with any additional program to verify dike integrity is unwarranted.

In addition, Section 7d outlines the requirements for an extensive dike surveillance program including the incorporation of the program into the Technical Specification. A surveillance program is outlined in a CECO Engineering Instruction No. 1-1-A-37/ Production Instruction No. 1-3-A-26. This instruction is attached at the end of the comments on the Summary and Conclusion Section. Since the surveillance procedure is not related to a limiting condition for operation of the plant, the Applicant feels that its inclusion as a Technical Specification requirement is an unjustified extension of Technical Specifications and is not warranted. This same comment also applies to Section 5.1.5.d (page 5-5).

The Applicant objects to including in the Environmental Technical Specification programs for the use and control of herbicides, the disposal of dredgings, measurement and control of the thermal plume, the use of algicides, dike surveillance and elimination of dense fog on local roads for the following reasons:

The Use and Control of Herbicides

The present herbicide practices used by the Applicant more than meet the current 8 point guideline recommended by the Staff on page 5-36 in the draft. Because of the generic nature of the Applicant's herbicide application activities, it is felt that a specific technical specification for its use and control does not fall under the realm of an Environmental Technical Specification for a specific station. The Applicant will, however, be happy to provide information to the Staff concerning its current herbicide application activities for the Dresden Station area and to report annually any modifications to that program if the Staff is interested.

The Disposal of Dredgings

Because overall lake dredging is not anticipated at this time or for many years for reasons discussed in comments relating to the accumulation of silt on pg. 5-39, Sec. C, the Applicant feels that the development of a specific program to be included in an Environmental Technical Specification is premature at best. In the event it does become necessary to perform any dredging, the spoil material will be disposed of in accordance with the then current land pollution control practices of the State of Illinois.

The Measurement and Control of the Thermal Plume

The Applicant objects to incorporating and implementing measurement and control of Dresden's thermal plume in an Environmental Technical Specification because of reasons specifically discussed in comments relating to the implementation of a Tech. Spec. on page 6-7, Section 6.2.1.a.7

The Use of Algicides

The Applicant objects to including in its Environmental Technical Specification a plan for the use of algicide application in the lake because of reasons discussed in comments on page 5-33 of the draft.

Dike Surveillance

The Applicant feels that the dike surveillance program presently being implemented more properly falls in the category of a general company (See Section 7d comments above).

Elimination of Dense Fog on Local Roads

This wording appears in error since the text does not refer to eliminating fog. All references concern mitigating the consequences of fog. Further, the Applicant does not feel that mitigating fog consequences should be a part of the Technical Specifications. A scheme is already being practiced (See Section 5.1.2 Comments) that alleviates the consequences of fog on County Line Road and this scheme does not have any Technical Specification ramifications by its very nature.

Although the Applicant objects to developing specific technical specification monitoring requirements, it is agreed to have specific procedures for monitoring the following: Monitoring fecal coliform in the spray canals, monitoring and control of chlorine, monitoring of dissolved oxygen, and monitoring fish populations.

The Applicant, disagrees in part with the Staff's recommendations concerning development of specific monitoring programs for reasons stated in the respective sections where these items are discussed.

Concerning the Environmental Technical Specification for developing an operational procedure for closed cycle cooling lake operation program, the Applicant feels that this should be addressed in a station operation procedure and not in an Environmental Technical Specification.