



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 5
 77 WEST JACKSON BOULEVARD
 CHICAGO, IL 60604-3590

AUG 19 1999

REPLY TO THE ATTENTION OF:

B-19J

Mr. George F. Dick
 Senior Project Manager, Section 2
 Project Directorate III
 Division of Licensing Project Management
 Office of Nuclear Reactor Regulation
 U.S. Nuclear Regulatory Commission
 Washington, D.C. 20555-0001

RE: License Nos. NPF-72, NPF-77, NPF-37, NPF-66, DPR-19, DPR-25, NPF-11, NPF-18, DPR-29 and DPR-30

Dear Mr. Dick,

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, we have reviewed the Environmental Assessment and Finding of No Significant Impacts (EA/FONSI) for the U.S. Nuclear Regulatory Commission (U.S. NRC) consideration to issue exemptions from certain requirements of its regulations to Facility Operating Licenses issued to Commonwealth Edison company (ComEd). The Facility Operating Licenses were issued to ComEd for operation of Braidwood Station located in Will County, Illinois; Byron Station located in Ogle County, Illinois, Dresden Station located in Grundy County, Illinois; LaSalle County Station located in LaSalle county, Illinois; and Quad Cities Station located in Rock Island County, Illinois.

Based on our review, the Purpose and Need statement for changing the requirements appears to be inadequately supported in the EA/FONSI. The Federal Register notice proposes changing the requirement of submitting an annual Updated Final Safety Analysis Report to a 24 month schedule from the annual schedule. This is based on the assertions that this report is only administrative and there would be "no significant increase in occupational or public radiation exposure."

Our Agency is concerned with the extension of the reporting time which may be viewed by the public as a reduction in protection from potential emissions from the nuclear power plants at a time of increased safety concerns related to operation and maintenance of nuclear power plants throughout our country. This concern may only be a perception, but needs to be carefully considered in light of the on-going and future decommissioning and decontamination of power plants. The perception of the public could easily be unfavorable with a reduced reporting requirement to demonstrate that the emissions have not increased.

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We appreciate the opportunity to offer comments on this project. We look forward to receiving your comments related to the concerns outlined above. If you should have any questions about this matter, please contact Mazin Enwiya at (312) 353-8414 or by email at enwiya.mazin@epamail.epa.gov.

Sincerely,



for Shirley Mitchell, Deputy Director
Office of Strategic Environmental Analysis