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 AUTH. NAME AUTHOR AFFILIATION
 TEDFORD, C.F. Arizona, State of
 RECIP. NAME RECIPIENT AFFILIATION
 MIRAGLIA, F.J. Licensing Branch 3

SUBJECT: Submits comments considered germane to review of facilities
 DES.

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Bruce Babbitt
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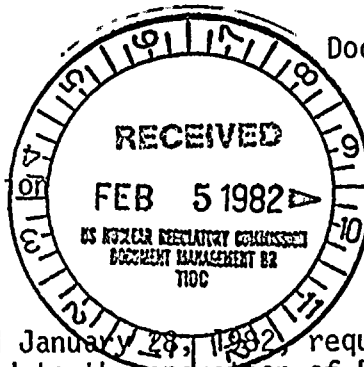
Tempe, Arizona 85281

(602) 255-4845

January 29, 1982

Mr. Frank J. Miraglia, Chief
Licensing Branch #3
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docket Nos. 50-528
50-529
and 50-530



Dear Mr. Miraglia:

The recent correspondence dated January 28, 1982, requesting comments on the "Draft Environmental Statement" related to the operation of Palo Verde Nuclear Generating Station Units 1, 2, 3 has been received. I should note for the record this is the first official document received by this agency regarding the aforementioned request. Mr. Licitra called during the earlier part of January and solicited the Agency's overdue comments to correspondence supposedly received during October, 1980. The Agency never received this correspondence. Accordingly, please note the correct address.

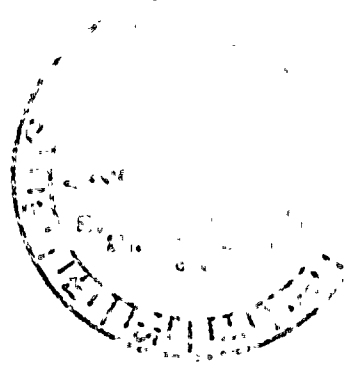
The following comments are considered germane to the review:

1. Page 4-4, Section 4.2.5: Radioactive Waste Management Systems. The last paragraph, line 5, states : approximately 18,000 cubic feet of "wet" solid wastes and 12,000 cubic feet of "dry" solid wastes will be shipped off-site annually from each unit to a licensed burial site. The NRC staff is requested to project a realistic estimate of total cubic feet of waste per reactor after compaction, incineration, and concentration have occurred. The guesstimate will prove useful in the projection of future Low Level Waste volume requirements.
2. Page 5-25, Sec. 5.9.1.1.2: Emergency Planning. The first paragraph, last sentence : "Why are concentrations of I₂ in the thyroid and C-14 in bone of particular significance here?" An explanation is in order, particularly regarding the use of the word "here."
3. Page 5-57, Table 5.4. The basis for the average cost of protective action and decontamination of \$2,600 should be amplified and explained.
4. Page 5-65, Sec. 5.12, 2nd paragraph, first sentence. The suggestion is to delete or rewrite. The second sentence clarifies meaning and can stand by itself.
5. Page 5-65, Section 5.11: Decommissioning Impacts. The second paragraph addresses the estimated decommissioning, SAFSTOR, ENTOMB, and annual maintenance and surveillance costs. What mechanism has been established to collect and accrue these funds?

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6. General comment: Cotton is one of Arizona's principal crops and is grown in Maricopa County. Cottonseed oil is a component of cooking oils. No note of this could be found in the DES. This point should be addressed.

To summarize, I must state that the document was impressive with regard to detail, accuracy, and completeness. The NRC is to be commended for a fine effort.

Sincerely,



Charles F. Tedford
Director

CFT:clp

cc: George Britton
Office of the Governor

ENCLOSURE 2

- EPA-11 The routing of contaminated steam to the condenser would not be undertaken without offsite power to operate the cooling water pumps. The on-site standby power source is not sized to sustain the addition of such a relatively large load.
- APPA-3 The basis for the average cost of protective action and decontamination (\$2260) is described in Appendix VI, Section 12 (Economic Model) of the Reactor Safety Study (WASH-1400, NUREG 75/014). The analyses performed to obtain this average cost (1980 dollars) incorporate the spread of a radionuclide-containing plume and its effects on residents and property. Intermediate monetary costs calculated in the analyses are those for decontamination of farm fields, residences, businesses, and public areas. Resident relocation costs and costs of milk denial and non-dairy product denial are also included.

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