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## Arizona Public Service Company

P.O. BOX 21666 • PHOENIX, ARIZONA 85036

December 2, 1982 ANPP-22439 - WFQ/TFQ

Mr. T. H. Novak Assistant Director for Licensing Division of Licensing Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, D. C. 20555

PDR

Subject: Palo Verde Nuclear Generating Station (PVNGS) Units 1, 2 and 3 Docket Nos. STN-50-528/529/530 File: 82-056-026; G.1.01.10

Reference: Letter from J. D. Kerrigan, NRC, to E. E. Van Brunt, APS, dated September 23, 1982. Subject: Environmental Protection Plan - Palo Verde Nuclear Generating Station

Dear Mr. Novak:

8212070109 821202 PDR ADDCK 05000528

> The Referenced letter transmitted a draft version of the Palo Verde Environmental Protection Plan: (EPP), and requested that we provide comments on this draft document.

> We have reviewed the document, and our comments are attached. Please contact me if you need any further assistance on this matter.

Very truly yours au 100

E. E. Van Brunt, Jr. APS Vice President, Nuclear Projects ANPP Project Director

EEVBJr/TFQ/sp Attachment

- cc: E. Licitra
  - L. Bernabei P. Hourihan
  - A. Gehr

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December 2, 1982 ANPP-22439 - WFQ/TFQ

STATE OF ARIZONA ) ) ss. COUNTY OF MARICOPA)

I, Edwin E. Van Brunt, Jr., represent that I am Vice President Nuclear Projects of Arizona Public Service Company, that the foregoing document has been signed by me on behalf of Arizona Public Service Company with full authority so to do, that I have read such document and know its contents, and that to the best of my knowledge and belief; the statements made therein are true.

Edwin E. Van Brunt, Jr.

Sworn to before me this 2nd day of December 1982. Notary Public My Commission expires:

My Commission Expires May 19, 1986

## And the test of the second second

Z Z May Commission Expires May 18, 1985

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# COMMENTS ON APPENDIX B TO LICENSE DPR-50/528/529/530 PVNGS ENVIRONMENTAL PROTECTION PLAN

#### Section 2.2--Terrestrial Issues

Although no terrestrial issues requiring environmental monitoring programs were identified in the FES-OL, the applicant feels that it is appropriate to continue the ecological monitoring program referenced in the FES-CP. Further, the applicant intends that this program be augmented to determine what, if any, effects are caused by operation of the cooling towers.

The monitoring program will be conducted on-site and off-site out to approximately 5 miles from the cooling towers. This 5-mile distance corresponds to the maximum distance beyond which it is generally accepted that total salt deposition is not expected to be significant. It will consist of airborne salt monitoring using existing continuous low-volume samplers which are a part of the PVNGS environmental radioactivity monitoring program. Filters from these samplers will be analyzed periodically in a laboratory to determine airborne salt deposition. Further, additional monitoring will be conducted at specific locations which include natural desert and agricultural lands within 5 miles of the PVNGS cooling towers and in areas where maximum total salt deposition values are predicted to occur. Vegetation and soil monitoring will be conducted seasonally. This program as described above will be instituted for pre-operational baseline monitoring to determine background airborne salt deposition and salt deposition on vegetation and soils. This program will be continued for two years after commercial operation of PVNGS Unit 3.

### Section 2.3--Cultural Resources Issues

It is suggested that the responsibility for cultural resource compliance be delegated to the Bureau of Land Management (BLM) instead of the NRC. For the Palo Verde-Devers transmission line construction, the NRC and Department of Interior (DOI) had a Memorandum of Agreement which designated BLM as the lead agency for the powerline. The BLM requirements for construction and monitoring were considered to be adequate to demonstrate compliance with State and Federal archaeological requirements.

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In Arizona it is virtually inpossible to establish a right-of-way for electric transmission lines without crossing lines owned by the United States Government and managed by the Bureau of Land Management (BLM) or some other agency of the U. S. Department of the Interior or U. S. Department of Agriculture. Accordingly, before a corridor for electric transmission lines can be identified such agency is obligated to comply with the federal laws designed to protect cultural resources in the same manner as the NRC is obligated so to do. For this reason, it is suggested with respect to the proposed Palo Verde - Saguaro transmission line that if in the selection of the corridor for such line, compliance with federal laws protecting cultural resources has been established by another federal agency, the NRC should accept the findings and conclusions of such agency without further review. ×

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