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 BAJWA, S.S. Assistant Director for Environmental Technology
 Assistant Director for Environmental Technology

SUBJECT: Forwards comments on draft suppl to draft EIS re operation of facilities, specifically Pond Hill Creek Reservoir.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

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MAY 30 1980

Director, Division of Site
Safety & Environmental Analysis
Attn: Mr. S. Singh Bajwa
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Bajwa:

Thank you for granting us a short extension on the deadline for submitting comments on the Draft Supplement to the Draft EIS related to operation of SSES, Units 1 and 2, specifically the Pond Hill Creek Reservoir.

Our comments are attached and if any questions arise in relation to them please contact us on FTS 597-7188.

Sincerely yours,

Robert S. Davis

Robert S. Davis

Attachment

Good
ES.11

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Below are comments on Draft Supplement EIS SSES for the Pond Hill Reservoir pumped storage facility. We believe an ER-2 rating is justified relative to this document. Please find attached a copy of our system for commenting on EIS's. The ER stands for Environmental Reservations and the 2 indicates Insufficient Information.

Information regarding floods and flooding is sparse. In addition, the map on page 2-7 does not adequately depict the Pond Hill Creek floodplain nor the Susquehanna River Floodplain. No doubt some changes will take place in these areas as a result of the project and such changes should be addressed.

With regard to flooding, our information does not agree with either the applicant's or the NRC's. Calculations based upon the maximum storm of recent years, i.e. hurricane Agnes, indicates a 686 mm precipitation event. It is our belief that this impoundment would be topped in such a storm and, depending upon dam construction, may wash out and compound the downstream damages due to flooding. In addition, thorough information should be presented regarding other effects of storms of lesser intensity so that a complete analysis can be made.

The flooding impact potentials as well as the floodplain effects may in themselves indicate that the impoundment should not be built; however, one other point should be more thoroughly presented. This is the frequency analysis of low flows that would interrupt the operation of the power station. In this context, the use of such terminology as "... in some years..." and "... require several shutdowns..." is too inspecific for adequate evaluation. The reasons for not using the river follow alternative, then, based upon information here, are inadequate.

Around the saddle from the "top of the ridge", where a dike is to be placed, is another saddle. This second saddle appears to be within the same contour lines as the "saddle" to be diked yet no mention is made either of its potential as an "accidental" spillway in times of severe flooding or of the necessity of a dike in this area. (Re. fig. 3.2, p 3-3). Furthermore, no mention is made of the severe flooding potential associated with the Lily Lake; a very low saddle between these two sites indicates a possible spill over into Pond Run watershed during severe storm periods.

The discussions on wildlife resources is acceptable, but shows some deficiencies with regard to periodicities exhibited by some animals. For example, it is stated with far too much assurance that the eastern cottontail is of minor importance. However, this animal is currently near or at the low point in its seven year cycle. (p 2-11). As the cottontail is a major component of the food web further decreases in its population may be significant.

The operational parameters discussed on pages 3-4 and 4-10 & 11 fail to describe adequately the frequency of intakes and releases and their effects on the reservoir itself and upon the Susquehanna River. For example, this

reservoir may have multiple uses among them being recreation. The worst possible case should be described when the level is dropped to an extreme where such activities are curtailed. Also, during these low levels what will the effects be upon the Susquehanna at the point where reduced flows in the river are augmented by the maintenance from the reservoir?

During low flow periods, when the reservoir intake cannot be used, and the river must be augmented by flows from the impoundment, will evaporative losses be significant? Evaporative losses during hot weather are large. These losses coupled with drawdown may indicate a shorter useful storage capacity than is indicated in the document.

In sum, this supplementary document does not adequately discuss alternative measures other than providing flows from the river itself or other reservoirs. Alternative sites to the one presented here are given only cursory attention. Under the new CEQ guidelines, such documents as this are supposed to describe the decisionmaking process and not merely represent the most favorable arguments for choosing this alternative.

Environmental Impact of the Action

LO--Lack of Objections

EPA has no objections to the proposed action as described in the draft impact statement or suggests only minor changes in the proposed action.

ER--Environmental Reservations

EPA has reservations concerning the environmental effects of certain aspects of the proposed action. EPA believes that further study of suggested alternatives or modifications is required and has asked the originating Federal agency to reassess these aspects.

EU--Environmentally Unsatisfactory

EPA believes that the proposed action is unsatisfactory because of its potentially harmful effect on the environment. Furthermore, the Agency believes that the potential safeguards which might be utilized may not adequately protect the environment from hazards arising from this action. The Agency recommends that alternatives to the action be analyzed further (including the possibility of no action at all).

Adequacy of the Impact Statement

Category 1--Adequate

The draft impact statement adequately sets forth the environmental impact of the proposed project or action as well as alternatives reasonably available to the project or action.

Category 2--Insufficient information

EPA believes that the draft impact statement does not contain sufficient information to assess fully the environmental impact of the proposed project or action. However, from the information submitted, the Agency is able to make a preliminary determination of the impact on the environment. EPA has requested that the originator provide the information that was not included in the draft statement.

Category 3--Inadequate

EPA believes that the draft impact statement does not adequately assess the environmental impact of the proposed project or action, or that the statement inadequately analyzes reasonably available alternatives. The Agency has requested more information and analysis concerning the potential environmental hazards and has asked that substantial revision be made to the draft statement.

If a draft impact statement is assigned a Category 3, ordinarily no rating will be made of the project or action, since a basis does not generally exist on which to make such a determination.