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 AUTH. NAME: AUTHOR AFFILIATION
 RATHLESHERGER, J Interior, Dept. of
 RECIP. NAME: RECIPIENT AFFILIATION
 SELLS, D.E. Assistant Director for Environmental Technology

SUBJECT: Comments on draft suppl to EIS re facility operation.
 Provided that util implements mgt plans in consultation
 w/PA Fish & Game Commissions, no objections offered to const
 as proposed.

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United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

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MAY 29 1980

Mr. Donald E. Sells
Acting Branch Chief
Environmental Projects Branch 2
Division of Site Safety and
Environmental Analysis
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Sells:

The Department of the Interior has reviewed the draft supplement to the environmental impact statement related to the operation of the Susquehanna Steam Electric Station, Units 1 and 2, Luzerne County, Pennsylvania. We have the following comments.

We find that the supplement adequately describes existing fish and wildlife resources and impacts on those resources from construction of the proposed impoundment. Provided that the Pennsylvania Power and Light Company implements the management plans to be submitted by the applicant in consultation with the Pennsylvania Fish and Game Commissions (page 4-3 of the draft supplement), we have no objection to construction of the project as proposed.

We recommend that the following be stipulated in any operating license issued by the Nuclear Regulatory Commission for this project.

"That the Licensee implements the fish and wildlife management plan to be developed in consultation with the Pennsylvania Fish Commission, the Pennsylvania Game Commission, and the U.S. Fish and Wildlife Service."

The proposed spillway capacity was found by the NRC staff to be insufficient to pass a probable maximum flood. The dam would be overtopped in such a flood and might fail (p. 4-11, item 4.4.2,3). The applicant's spillway design flood, based on the 6-hour probable maximum precipitation, apparently was calculated without consideration of the effects of potential antecedent storm runoff. Although the drainage area above the dam is small, the amount of water

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to be stored as well as the dam's height are significant and, as indicated, failure could lead to loss of life (p. 4-11, par. 8). The spillway design flood should be reevaluated.

Item 3(1) on page ii of the Summary and Conclusions section states that certain lands will be converted to recreational uses. No discussion is given, however, to the possible environmental effects of this proposed action. Also, there is no mention of a need to survey this land to identify and evaluate cultural resources that may be impacted. At the request of the NRC, the Interagency Archeological Service Atlanta Office prepared a survey plan and cost estimate for a proposed recreational area along the Susquehanna River. This was provided to NRC on December 19, 1979. The NRC should reference the requirement to survey the proposed recreational areas as well as the proposed Pond Hill Reservoir Site.

The discussion of Impacts to Cultural Resources (p. 4-14), should recommend an appropriate management program to be developed only for those sites that meet National Register of Historic Places criteria. Identification and evaluation studies and management programs must be developed in accordance with 36 CFR 800, including consultation with the State Historic Preservation Officer (SHPO). For Pennsylvania, the SHPO is Edward Weintraub, Executive Director, Historical Museum Commission, P.O. Box 1026, Harrisburg, Pennsylvania 17120.

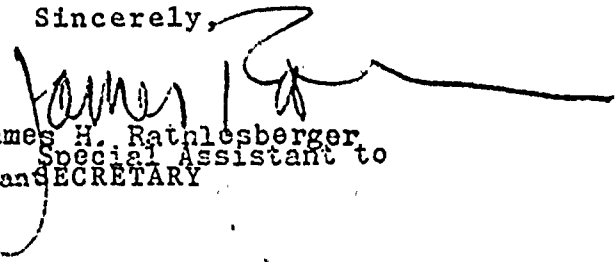
The Archeological Survey Plan for the Pond Hill Reservoir Site (Appendix B) does not clearly indicate whether the acreage to be surveyed under the Commonwealth Associate, Inc. proposal is the approximately 150 acres within the reservoir, or would cover the approximately 1300 acres of the entire project area. All areas to be affected, including transmission line corridors, borrow areas, and recreation facilities, should be surveyed to insure that all cultural resources that may be affected by the undertaking are identified.

Commonwealth Associates proposes that transects spaced at 30 meter intervals will be walked, but does not justify why a 30 meter interval was chosen. This may be sufficient for uplands and slopes but not sufficient in other areas such as terraces. There is no indication of what the interval for shovel testing will be along the transects. Also, testing to a depth of 25 centimeters may be inadequate

depending on the depth of the plow zone or fill. We suggest that shovel tests be taken to a depth approximately 20 centimeters below the plow zone or fill, and to search below cultural deposits.

We hope these comments will be of assistance to you.

Sincerely,



James H. Rathlesberger
Special Assistant to
Assistant SECRETARY