



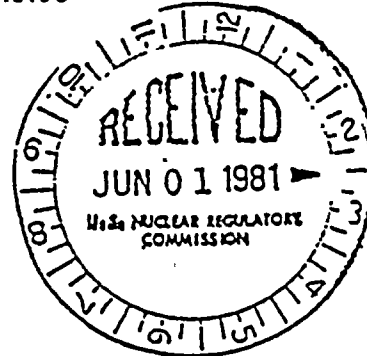
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

MAY 28 1981

Mr. B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555



Dear Mr. Youngblood:

We have completed our review of the Supplement to the Draft Environmental Impact Statement related to the operation of the Susquehanna Steam Electric Station Units 1 and 2. We offer the following comments for your consideration.

The Commission is to be commended for its decision to prepare this Supplement discussing the environmental and societal impacts of a core melt down accident.

EPA has emphasized the need to review an evaluation of the environmental impacts resulting from different LWR accident scenarios including Class 9 accidents.

The assessment of environmental impacts relating to severe accidents at the plant employs methods originally developed in the Reactor Safety Study (WASH-0400). These two studies will be the basis for similar environmental assessments of other nuclear power plants so that we recommend that NRC refer to EPA's original technical comments on these studies. The comments are included in the publication "Reactor Safety Study (WASH-1400): A Review of the Final Report" and a letter from EPA's Office of Federal Activities to NRC dated February 8, 1977.

The Table 6.1.4-4 (p. 6-26) should correspond on a one-to-one basis with the accident sequence or sequence groups of Table 6.1.4-2 (p. 6-23). The notations relating to this Table (6.1.4-2) and described in Appendix H needs clarification. EPA(1)
The uninitiated reading this, we believe would be very confused.

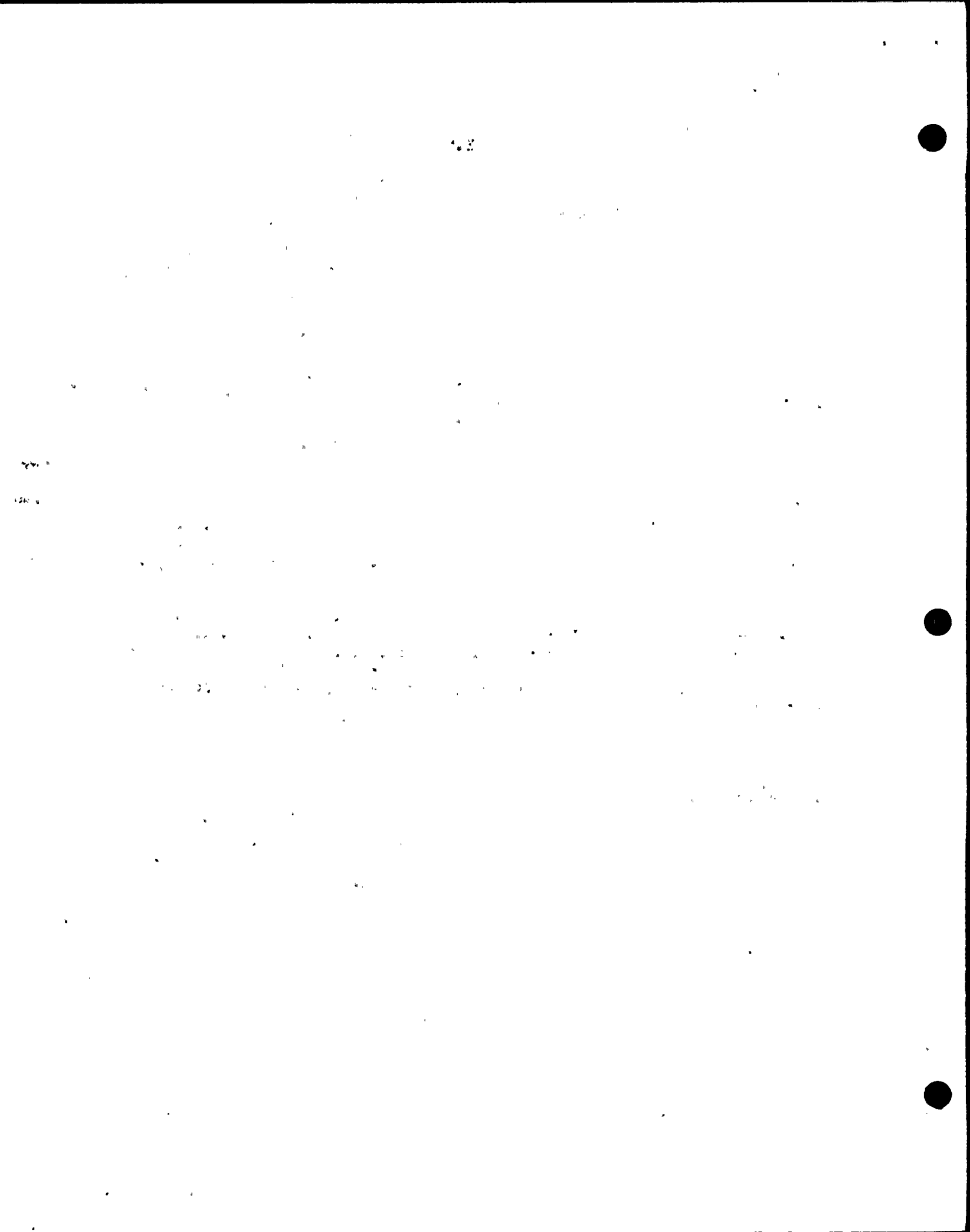
The discussion of impacts of infrequent accidents and limiting faults, in both the original DES and the Supplement, addresses probabilities of occurrence qualitatively. In the discussion, however, of the more severe core melt accidents, the probabilities of occurrence are quantified (Table 6.1.4-2). For EPA(2)
uniformity in the presentation of all environmental risks, the probabilities of occurrence of infrequent accidents and limiting faults Design Basis Accidents should be provided.

It is not clear whether the risks listed in Table 6.1.4-5, Annual Average Values of Environmental Risks Due to Accidents, include those from infrequent accidents

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and limiting faults (Table 6.1.4-1), postulated accidents (Table 6.2 of the original Draft Environmental Impact Statement), and accidents leading to the sequence groups listed in Table 6.1.4-2. The Final Environmental Impact Statement should include all risks from moderate frequency accidents, infrequent accidents, limiting faults and severe core melt accidents. The risk of the infrequent accidents, and limiting faults is "judged to be extremely small" but should be fully presented and not overshadowed by the risks from core melt accidents. The risks from the more probable yet lower consequence accidents may indeed be significant to the individual risk and should be listed. It would also be informative to extend Figures 6.1.4-3 and 6.1.4-5 to include higher probability accidents. EPA (3)

It would also be helpful to develop a summary table of the annual average value of the environmental risks from operation of all the reactors at the Susquehanna site. The risks should include those from normal operations, moderate frequency accidents, infrequent accidents, limiting faults and severe core melt accidents; societal and individual risks should also be addressed. EPA (4)

The Three Mile Island-2 accident demonstrated a factor that should be addressed. The cost of reactor building decontamination and the replacement power economics have proved to be very sizeable items. These factors are significant and important to the benefit-cost analysis. These facts underscore the need to develop standard methods for estimating the contribution of these costs to economic risks. Impact Statements or Supplements should include these economics in their benefit-cost balance. EPA (5)

We would classify this document in EPA's Reporting Category ER-2. This means we have reservations concerning the manner in which the accidents are treated and we also believe additional clarification is required.

We thank you for the opportunity to review the document and await the issuance of the final.

Sincerely yours,



John R. Pomponio
Chief
EIS & Wetlands Review Section