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SUBJECT: Forwards Dept of Environ Resources comment on Suppl 2 to DES.

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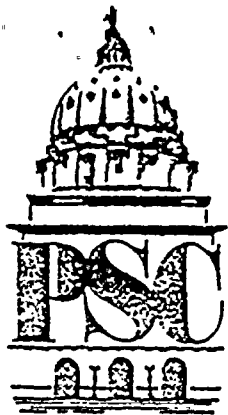
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JUN 04 1981

GOVERNOR'S OFFICE
OFFICE OF THE BUDGET

RE: PSCH # 58104004

APPLICANT: U.S. Nuclear Regulatory
Commission

PROJECT: Supplement 2 to DEIS
Piquette Station
Electric Station, Units 1 and 2

Dear Applicant:

Attached are comments concerning your State Clearinghouse
submission referenced above.

Sincerely,

Anne Ketchum

Anne Ketchum
Supervisor



Cons. 11

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D



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

P. O. Box 2063
Harrisburg, PA 17120



May 27, 1981

SUBJECT: Review and Evaluation of PSCH No.: 5-81-04-004
Supplement to Draft Environmental Statement
Related to Operation of Susquehanna Steam
Electric Station, Luzerne County

TO: Anne Ketchum, Supervisor
Pennsylvania State Clearinghouse

FROM: CLIFFORD L. JONES
Secretary of Environmental Resources

The Department has reviewed the subject Draft Environmental Supplement.
We would like to offer the following comments.

(Section 6.1.4.1) The more pessimistic assumptions that are used for the design basis accident analysis should be explained in more detail. It should be made clear that the quantity of noble gases and iodine that are assumed to be released to the containment for these accident assessments are of the same magnitude as the source terms that are assumed for Class 9 accidents, and therefore could not occur unless severe fuel damage or melting had occurred.

For comparative purposes, Table 6.1.4.1 should include realistic thyroid doses and the calculated exposures using worst case assumptions.

(Section 6.1.4.2) It should be stated that significant changes have occurred in the GE BWR design since the Peach Bottom design, especially in the area of containment design, which should have lowered the overall probability of severe accidents. These major design changes should be identified in summary fashion.

A technical basis should be given for the statement that it is the staff's judgment that the calculated results of the consequences are more likely overestimates than underestimates.

(Section 6.1.4.5) It does not appear that a melt-through accident was considered to be a credible scenario for BWR's in the RSS. Furthermore, the LPGS does not appear to consider a BWR design in its assessment of land-based reactors. Therefore, additional justification should be given for including this scenario as part of the assessment; and if included, the risk in terms of dose should be better quantified.

(Section 6.1.4.6) The various methods by which risk is presented in both tabular and graphic form leads to confusion in interpreting the results. For example, the ratio of acute fatalities to latent cancer fatalities in Table 6.1.4-5 does not agree with the apparent ratio between Figures 6.1.4-7 and 6.1.4-8. It would be much more straightforward to show the average individual risk versus distance from the reactor (including inside the ten-mile radius) in either tabular or graphic form for both acute and latent cancer fatalities, with and without protective actions. This same figure could then include the risk from other man-made and natural risks, including natural background radiation and background cancer risks, for comparative purposes.

It appears as if the risks from the realistic assessment of design basis accidents is less than the risk from the realistic assessments of Class 9 accidents, with or without protective action. It is also apparent that the risk from Class 9 accidents is greater than the risk from normal operation. Based on this somewhat anomalous situation and coupled with the uncertainties which are attached to the assessment for Class 9 accidents, it would appear that further justification is necessary for the Staff to conclude that these accidents do not warrant additional study to determine whether public health and safety is adequately protected. It should be noted that various rule making proceedings are currently in progress which should better quantify the risk from these severe accidents and may, in fact, lead to a requirement for additional safeguard equipment to decrease this risk.