



# SUSQUEHANNA RIVER BASIN COMMISSION

1721 North Front Street

Harrisburg, Pennsylvania 17102

August 30, 1979

From the Office of the  
Executive Director

Mr. William H. Regan, Jr., Chief  
Environmental Projects Branch 2  
Division of Site Safety and  
Environmental Analysis  
Nuclear Regulatory Commission  
Washington, DC 20555

Re: Docket No. 50-387, 50-388

Dear Mr. Regan:

Reference is made to your letter dated June 22, 1979 transmitting the draft Environmental Statement for Susquehanna Steam Electric Station presently under construction by Pennsylvania Power and Light Company. The Commission staff has the following comments on this draft.

#22-1  
HMB

1. In section 3.2.1, page 3-1, it is stated that station water requirements have increased since the construction permit stage. Apparently the basis for this statement is the river intake flow shown in Table 3.1 which is shown as increasing by 0.45 cms (about 15 cfs). However, we cannot verify the 1972 figure shown in Table 3.1 nor can we determine the reason for the increased water withdrawals. Also, the text states that water withdrawal will be at a rate of 1.8 to 2.2 cms, but the table shows 2.45 cms. Please clarify the discrepancy and the reasons for increased water withdrawal. Also please clarify the text to indicate whether the increase pertains to water withdrawal or consumptive use.

#22-2  
HMB

2. In section 3.2.1, the discussion of the SRBC regulation is incorrect. The applicant will still be permitted to withdraw water during periods of low flow, but the amount of the consumptive use must be replaced. The proposed reservoir is not an alternative source of water but only a source of makeup water. The regulation is correctly stated in section 4.3.2.1 except that the third sentence should read, "The regulation requires replacement of consumptive use..."

#22-3  
HMB

3. It is stated on page iii and again in Table 3-1 that the maximum consumptive use is estimated to be 1.81 cms (63.9

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cfs). The basis for that number is not clear, but it appears to be based on four years of climatic data collected at the site. If so, it may not be representative of actual worst evaporative conditions experienced at the site. The Commission's concern, from the viewpoint of water management, is the probability of maximum consumptive use, expected under the worst set of climatic conditions, occurring concurrently with low flow. The draft EIS statement has not addressed this concern. Also, the procedures and assumptions used in making the calculation of maximum and average consumptive use should be clearly stated.

#22-4  
HMB

4. It is stated on page iii that the river flow at which consumptive use must be replaced is 23.2 cms (819.0 cfs). This figure should be equal to the 7-day, 10-year low flow plus the consumptive use. Our analysis of 7-day average low flow frequency at Wilkes-Barre, based on the period of record 1900-76, shows that the 7-day, 10-year low flow is 800 cfs. The applicant has used the value of 770 cfs which is based on an analysis by USGS for the shorter period 1900-72. We believe our analysis is more correct by virtue of including additional record.

Also, we believe that the consumptive use value used should be the maximum consumptive use, which is stated to be 64 cfs, rather than the average consumptive use used in your report. This is important in determining the storage required for consumptive loss makeup. The applicant has stated that they have computations showing that the design of the reservoir based on the 50 cfs average loss will provide adequate storage in a repeat of the 1964 drought of record. We have as yet not seen that data.

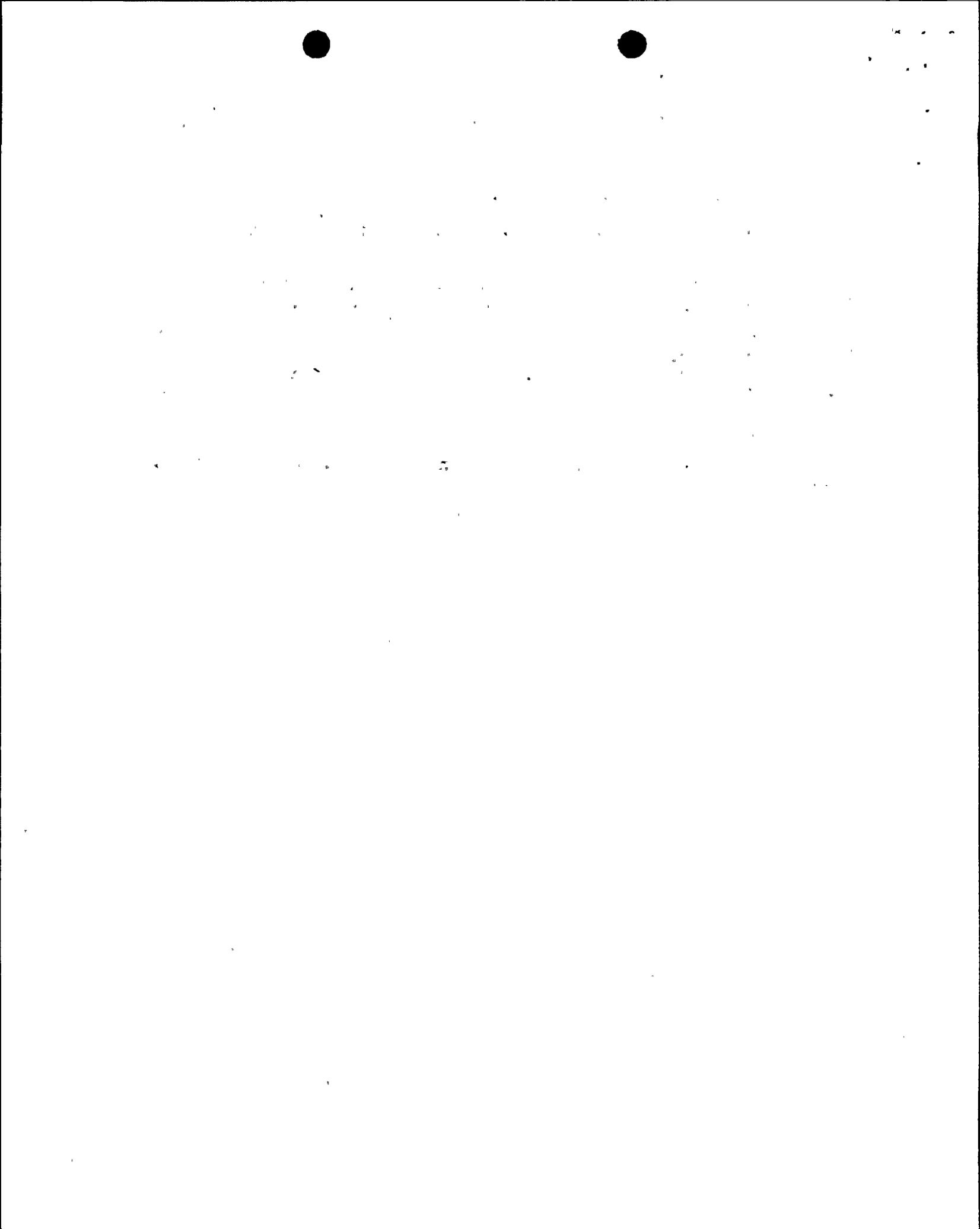
#22-5  
HMB

5. In section 3.2.2.3, page 3-8, the 7-day, 10-year low flow is identified as 23.2 cms (819.0 cfs). That appears to be inconsistent with the above comments, and with section 4.3.2.1, page 4-2 where the 7-day, 10-year low flow is stated as 21.8 cms (769.8 cfs).

#22-6  
ANL

6. The proposed intake structure may not meet the requirements of section 316(b) of PL 92-500. According to the Environmental Statement, the "embayment intake will remove more biomass than an alternative intake..." SRBC staff recommends that an intake structure be designed using best available technology before the plant is issued an operating license.

p. 4-10  
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#22-7  
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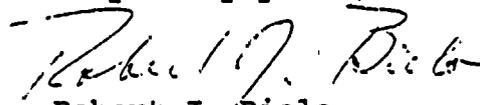
7. Staff is concerned about the effect of the consumptive withdrawal on aquatic habitat during prolonged periods of low flow. This concern should be addressed in the draft statement.

#22-8  
HMB  
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ESB

8. The post-operational monitoring programs do not include any provision for metering plant intake and discharge flows. We recommended to Pennsylvania DER that such flow meters be required in connection with approval of the encroachment permit for the intake and discharge structures, but these are not addressed in the Environmental Statement. We still believe that metering flows is an essential part of the environmental monitoring program.

Thank you for the opportunity to comment on this environmental statement.

Very truly yours,



Robert J. Bielo  
Executive Director







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in the amount of water they can use from  
the river. We object to the additional  
destruction of habitat, which would result.

On page G87, 6.2.2 in the Environmental  
Statement of June 1973, the staff comments  
"the applicant did not appear to have made  
arrangements for intensive surveys of data as yet,  
with nearby radiological monitoring programs  
at Peach Bottom, T.M.I., Beaver Creek, Bellefonte,  
Shoreham, Forked River, Newbold Island, Dale, or  
Lincoln." In the revised Draft Statement  
of June 1979, this omission has not been  
corrected.

In the section 4.5.5 on Uranium Fuel Cycle  
Impacts, we object to the conclusion that  
both the dose commitment and health effects  
of the uranium cycle are insignificant when  
compared with dose commitment and potential  
health effects to the U.S. population resulting  
from all the natural background sources.  
The effects are additive, and even the natural  
background sources are considered responsible  
for mutations, cancer, and other diseases. Just  
because we must tolerate natural background  
sources does not follow that radiation from  
the uranium fuel cycle is harmless!  
It could be the straw that breaks the  
camel's back.

Thank you for allowing us private citizens  
to make comments.

Very truly yours,  
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