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 AUTH. NAME AUTHOR AFFILIATION
 MEIREUTTO, L.E. Interior, Dept. of
 RECIPIENT NAME RECIPIENT AFFILIATION
 REGAN, W.H. Environmental Projects Branch 2

SUBJECT: Submits detailed comments on DES.

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OFFICE OF THE SECRETARY
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SEP 10 1979

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

Dear Mr. Regan:

The draft environmental statement for Susquehanna Steam Electric Station (SSES) Units 1 and 2 has been reviewed by this Department and we have the following comments. The comments are organized by page number in the document.

Page 2-28 and Page 4-33

We are concerned that the draft statement does not adequately address archeological and historic concerns. There appears to be a need for further investigation of significant properties in the area and identification of their relationship to the project. This applies to properties already on the National Register and any potential properties in the area but not yet evaluated.

On page 4-33, the draft states that "given the present inadequacies regarding cultural resource inventory and data, the staff cannot make a determination to the effect that the plant's operation will have no adverse effects on cultural resources that may be eligible for inclusion in the National Register. However, it is unlikely that the plant's operation will affect resources that are currently listed in the National Register (located in excess of 16 km from the plant property) . . ." The draft is unclear regarding the impact the plant and transmission corridors will have on properties close to the project site. Of particular concern are McClintock Hall, the Denison House, and Catlin Hall.

We urge the NRC to undertake a complete archeological and historic survey of the area in accordance with the requirements of 36 CFR 800 and Executive Order 11593. Names of persons qualified to undertake this survey may be obtained by contacting the State

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Historic Preservation Officer (SHPO) for Pennsylvania, Edward Weintraub, Executive Director, Historical Museum Commission, P.O. Box 1026, Harrisburg, PA 17120. Results of the survey should be included in the final document. Also in consultation with the SHPO the NRC should determine if any of those properties identified in the survey are eligible for listing in the National Register. If they are determined to be eligible, the procedures and process of 36 CFR 800.4 and 5 must be followed to completion.

Page 3-8

Sulfuric acid will be used to control scale formation. As noted in the statement the system will be operated at a positive saturation index to minimize the addition of acid. Without this control on acid usage, the discharge could carry over four times the sulfate concentration of the receiving waters. This could aggravate an already stressed situation since the Susquehanna exhibits high and variable sulfate concentrations.

In the same manner that alternative levels of acid addition have been discussed, we suggest that alternate methods of scale and corrosion control should be looked at. The final statement should present an environmental evaluation of such methods as organic or hydrochloric acids or mechanical means.

Page 4-9

Since the intake structures for this plant have been constructed, the final statement should discuss what sampling program is proposed and when it would be implemented to determine levels of entrainment and impingement, during all expected flow conditions, of Susquehanna River fish and aquatic invertebrates. Further, the final statement should include a discussion of the possible actions the licensees will take to modify the project to protect such aquatic resources in the event significant adverse impacts occur from entrainment, impingement, or streamflow diversion for consumptive use (50 cfs average).

Page 4-12

The staff concludes that no adverse environmental impacts, other than atmospheric plumes and snowfall, will occur as a result of the operation of the cooling towers at the SSES. The licensees propose to construct a reservoir (Pond Hill) to provide makeup water during low flow conditions in the Susquehanna River. The final statement should be revised to indicate some adverse environmental impact will occur with the operation of the cooling towers

and related reservoir. Construction of the dam and reservoir will destroy terrestrial wildlife habitat and reservoir filling operations will impact Susquehanna River aquatic invertebrate and fish populations through impingement, entrainment, streamflow regulation, and consumptive use of such flows.

Page 5-2

We agree with the staff that the applicant should monitor groundwater both upgradient and downgradient on a monthly basis. We note that the potential for radionuclide contamination of groundwater is implied on page D-1 of Appendix D.(item 1.6); however, figure 4.1 (p. 4-13) does not indicate groundwater as an exposure pathway to humans.

Page 6-4

The conclusion that "the environmental risks due to radiological accidents are exceedingly small and need not be considered further" ignores the probability and the consequences of core-melt accidents (p. 6-4, par. 1). As was explained in the environmental statement for the Palo Verde Nuclear Station (NUREG-0522, 1979), this "realistic analysis" is based on procedures in the Proposed Annex to Appendix D, 10 CFR Part 50, which specifically exclude the evaluation of core-melt accidents. Environmental damages resulting from a core-melt accident can be devastatingly severe and conclusions concerning environmental risks that ignore these accidents must be questioned. We believe that site-specific evaluations of the full range of potential accidents should be a part of the site selection process for nuclear power stations.

The section on Postulated Accidents Involving Radioactive Materials enumerates "Several of the more significant findings" of the Lewis Report (p. 6-3). The three findings summarized exclude the final finding of that report:

There have been instances in which WASH-1400 has been misused as a vehicle to judge the acceptability of reactor risks. In other cases it may have been used prematurely as an estimate of the absolute risk of reactor accidents without full realization of the wide band of uncertainties involved. Such use should be discouraged. (NUREG/CR-0400, p. x).

A footnote to table 6.2 states that "These calculations do not take into consideration the experience gained from the accident at the Three Mile Island site on March 28, 1979" (p. 6-3, footnote A). However, this provides no guidance on the possible magnitude or even the direction of the errors that may exist in the radiological consequences that are shown in the table. The largest

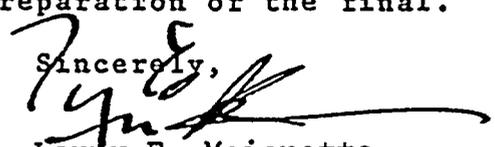
estimated dose to population in a 50-mile radius from any accident shown in the table is 37 man-rem. Until such time as the table can be revised, it might be helpful to note that the estimated dose to the population within a 50-mile radius of the Three Mile Island site was calculated to be 3,300 man-rem (NUREG-0558), p. 2, par. 2). The populations within that radius are not greatly different for the two sites, being 2,164,000 people in the case of the Three Mile Island site and projected to be 1,517,123 people within 50 miles of Susquehanna Steam Electric Station in the year 1980 (ER, table 2.1-8).

Page B-5

Table B.2 (page B-4) shows that 1,236 acres of forest and farmland will be required as rights-of-way for construction of a new transmission line system. The forested area could be managed effectively for wildlife if preferred vegetation and cover for grazing wildlife species were planted. Their feeding activities would help control revegetation of nuisance woody vegetation and reduce the need for clearing and herbicide applications. We recommend that Appendix B discuss the possibility of using plantings recommended by the Pennsylvania Game Commission for all forested areas cleared during transmission line construction.

We hope these comments will assist the preparation of the final.

Sincerely,



Larry E. Meierotto

Assistant SECRETARY