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 AUTH. NAME AUTHOR AFFILIATION  
 GROSSMAN, H. J. Affiliation Unknown  
 RECIP. NAME RECIPIENT AFFILIATION  
 SELLS, D. E. Environmental Projects Branch 2

SUBJECT: Forwards review supporting DES. Related correspondence  
 impinging on Councils A-95 review process encl.

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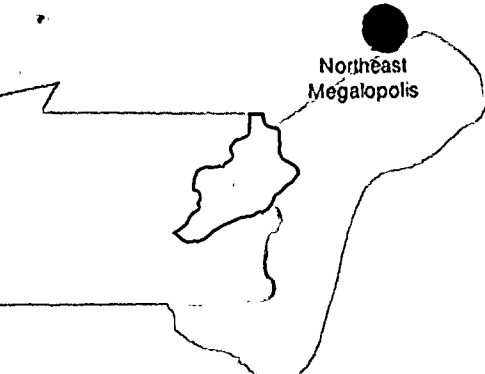
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economic development council of northeastern pennsylvania

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September 26, 1979

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:

This letter is being sent to you to formally notify you that the Executive Committee of the Economic Development Council of Northeastern Pennsylvania (EDCNP), at its regularly scheduled meeting on September 20, 1979, affirmatively reviewed the Nuclear Regulatory Commission's draft environmental statement relative to the operation of the Susquehanna Steam Electronic Station, Units 1 and 2. Attached you will find several attachments which outline the Council's A-95 review process, its major comments on this draft environmental statement, and other related correspondence which the Council utilized in arriving at its conclusion on this proposal.

The Council trusts the attached material will help you finalize a decision on this matter. If additional clarification is desired, please contact me at your earliest convenience.

Yours truly,  
*Howard J. Grossman*  
Howard J. Grossman  
Executive Director

HJG:sma

Attachments

CC: Rick Heiss, A-95 State Clearinghouse  
Luzerne County Planning Commission  
Lackawanna County Planning Commission  
SEDA-COG  
Paul Stewart, PP&L  
File

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VIVIAN P. EDWARDS, PRESIDENT  
HOWARD J. GROSSMAN, EXECUTIVE DIRECTOR

P.O. BOX 777 / AVOCA, PA. 18641 / TEL. 717-655-5581

PNRS REVIEW OF THE  
DRAFT ENVIRONMENTAL STATEMENT  
RELATED TO THE  
SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 & 2  
BY THE  
ECONOMIC DEVELOPMENT COUNCIL OF NORTHEASTERN PENNSYLVANIA (EDCNP)

Background

On June 28, 1979, the EDCNP received a copy of the Draft Environmental Statement (EIS) on the Susquehanna Steam Electric Station, Units 1 & 2 from the U.S. Nuclear Regulatory Commission.

Upon receiving this EIS, the EDCNP notified the following agencies that it had the report; they could review the report in its offices during regular working hours; and they had until August 12, 1979, to forward their comments on the report to the EDCNP.

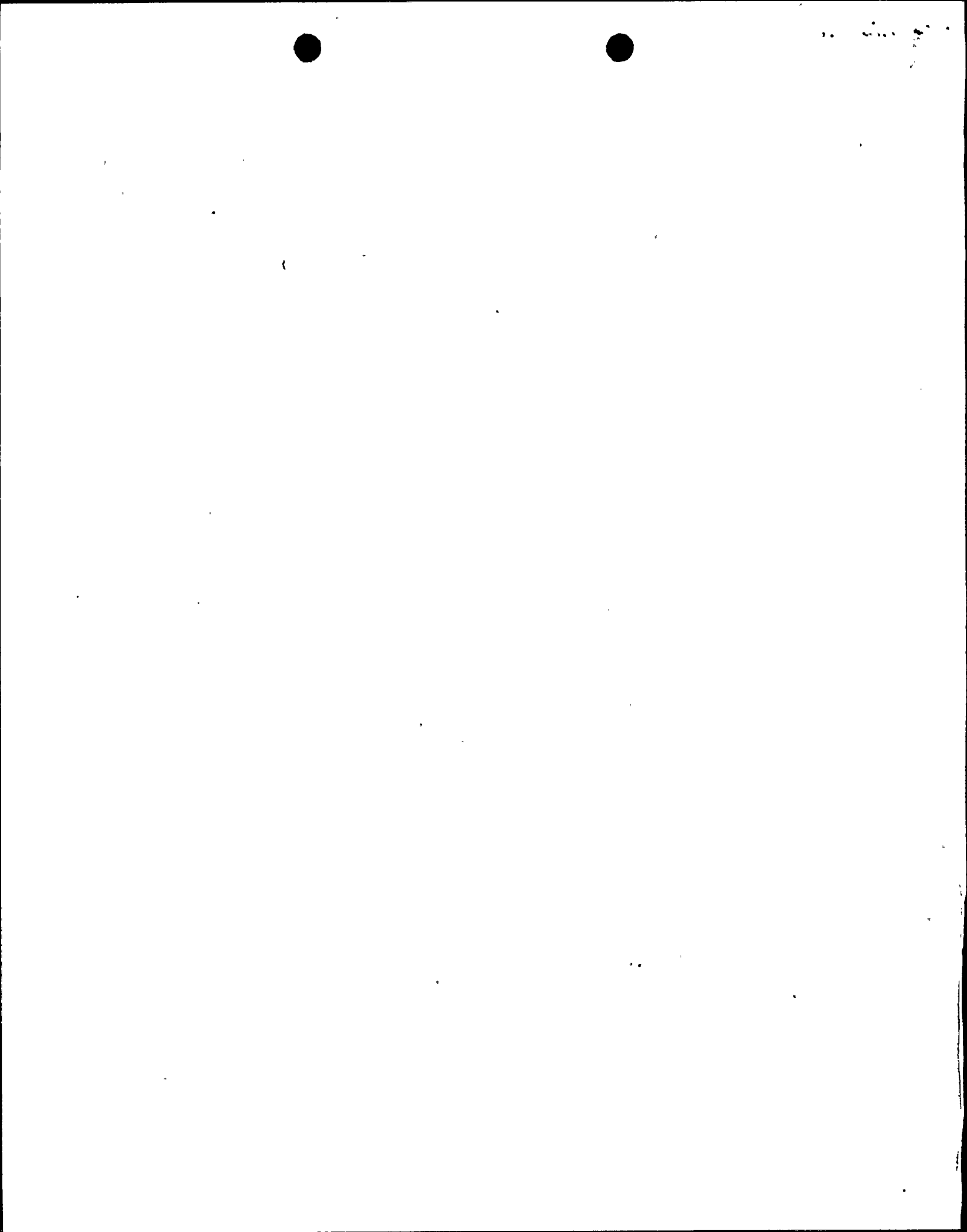
1. Lackawanna County Planning Commission
2. Schuylkill County Planning Commission
3. Monroe County Planning Commission
4. Susquehanna Economic Development Association Council of Governments (SEDA-COG)

The EDCNP's Deputy Director orally told the Executive Director of the Luzerne-Lackawanna Environmental Council (Lu-Lac) that the EDCNP had the report and that it could be reviewed in our office. The Council did not notify the Luzerne County Planning Commission since it was its understanding, based upon the cover letter it received from the NRC, that the Luzerne County Planning Commission received a copy of the report in the mail.

Upon receiving the report, the Council's staff immediately began to review the report. While this review was taking place, the staff also reviewed various A-95 reports and circulars to ascertain how such an EIS should be reviewed and its purviews under the A-95 Process. The staff, also, contacted the State Clearinghouse and the National Association of Regional Councils (NARC) to ascertain if any other agencies had performed similar reviews; and also, to alert them of our proposed actions. They both told us that they believed we were one of the first regional agencies, to the best of their knowledge, to review an environmental impact statement for a nuclear power plant under the A-95 System and believed we were going about it in a responsible way.

The staff, realizing this review was on a potential controversial project, brought the matter before the Council's Policy Committee for policy guidance. The Policy Committee told the Executive Director that the staff should handle the project like any other important PNRS project generated in the region.

As such, the staff, in addition to reviewing the draft EIS, also read for background information, the following publications in addition to the Draft EIS:



- (1) The Final Report on a Study of the Effectiveness of A-95 Procedures and Their Administration with Regard to HUD Programs, dated March 1979 by Peat, Marwick, Mitchell & Co.
- (2) Effects of Nuclear Power Plants on Community Growth and Residential Property Values by H.B. Gamble, R. H. Downing, and O.H. Sauerlender, dated November 15, 1978, for the U.S. Nuclear Regulatory Commission.
- (3) A Review and Study of the Environmental Impact and Socio-Economic Impact of the Proposed Philadelphia Electric Company Limerick Generating Station Units 1 and 2 by the University City Science Center for the Montgomery County Planning Commission, dated March 14, 1974.
- (4) Areas Around Nuclear Facilities Should Be Better Prepared for Radiological Emergencies - A Report to Congress by the Comptroller General, dated March 30, 1979, and several other newspaper articles and speeches on this and related subjects.

In addition to reviewing these documents, the staff also talked to Jane Kenney, the Executive Director of the South Eastern New Hampshire Regional Planning Commission on its involvement in the siting, licensing, and monitoring of the "Seabrook Nuclear Power Plant."

The following comments on this EIS are a direct outgrowth of these reviews and conversations:

The Council's staff did not believe it had sufficient time nor the breadth and level of expertise to review and comment on many of the technical aspects of the EIS and its attachments. However, the Council's staff believed it had sufficient expertise and time to comment on the following items which were discussed with the Council's PNRS Committee, its Policy Committee, its Executive Committee and Board of Directors.

#### Summary of EDCNP's Comments

##### General Comments on History of the Project (Chapter I)

This EIS is an update of previous reports filed with the Nuclear Regulatory Commission.

A Safety Evaluation Report (SER) will be issued after the review and approval of this EIS and PP&L's Final Safety Analysis Report (FSAR).

Therefore, many of the concerns which the Council and other citizen groups may have on safety related issues associated with this plant (especially in light of the Three Mile Island (TMI) Accident) will be evaluated and commented upon at a later date if the Council is involved in that SER review.

## General Comments on the Site (Chapter II)

The EDCNP staff believes a considerable amount of data has been assembled and adequately analyzed relative to the site, the general environs (Luzerne County), and the various public facilities and utilities in the area.

However, there are some recent reports, events, and new institutional relationships which might be evaluated prior to the Units coming on line. These include:

- (1) Several state hospitals (Nanticoke, Hazleton, Pittston, etc.) may be either phased out or merged under the NPW proposal. It might be prudent to initiate programs similar to the one currently being undertaken between PP&L and the Berwick Hospital with other hospitals in the area (for example, Geisinger or the newly proposed NPW complex in the Wilkes-Barre area which is currently under construction).

Furthermore, more detailed evacuation plans should probably be worked out with the various local County and State Civil Defense and Emergency Medical Services (EMS) Agencies. The recent report issued by the Office of the Controller entitled A Report to Congress - Areas Around Nuclear Facilities Should Be Better Prepared for Radiological Emergencies, March, 1979, should be reviewed to ascertain potential roles and responsibilities of various public and private agencies in these efforts.

Furthermore, the EDCNP believes the most recent Section 208 Comprehensive Water Quality Management Program (COWAMP) reports for the Lower Susquehanna River Basin should be evaluated in light of any potential impact the plant and its ancillary facilities will have on current water and sewerage facilities and other water matters.

Also, the Council believes more information on the plant's location relative to the flood plain should be explained in more detail. It is difficult to ascertain if any of the proposed facilities are in the 100 year flood plain and/or if the construction of the Tioga Hammond Dams will affect the site and facilities in question (i.e. the intake and sewage treatment plant). The staff realizes this topic is discussed in more detail in Chapter 4; but believes this item should be thoroughly coordinated with the Susquehanna River Basin Commission. (SRBC).

Another item which needs attention is the preparation of a systematic survey of historic, ethnohistoric, and prehistoric cultural resources at the plant site and along the proposed transmission corridors. The Council believes a joint State - County - Utility study of these potential resources should be undertaken as soon as possible. Potential sources of funding might include: the Pennsylvania Historical & Museum Commission, the Pennsylvania Endowment for the Arts, the National Endowment of the Arts, the Appalachian Program, and possibly other local foundations. This program and any findings could conceivably become a part of the proposed recreation area and/or part of the programs of local colleges (Wilkes, Luzerne County Community College, Bloomsburg State College, and Bucknell).

### General Comments on the Plant (Chapter III)

Based upon the data presented in the EIS, it appears the Susquehanna River Basin Commission will not permit PP&L to withdraw the necessary volume of water from the river during periods of low flow.

Apparently PP&L is considering the construction of a reservoir or an alternate water source. The Council trusts that this reservoir will be capable of not only supplying the water needs at the proposed plant, but also be of sufficient size to augment the flow of the river to insure an adequate water supply for the water intakes on the river for the Cities of Danville, Berwick, and Bloomsburg.

The Council would appreciate receiving a copy of this report on the proposed reservoir from either the utility or NRC.

It, also, appears that the proposed river intake structure will only be .3 of a meter (approximately 1 foot) above the Standard Project Flood (SPF). The placement of this facility should be closely evaluated in light of the region's experience in 1972 during Tropical Storm Agnes and the amount of protection, if any, which the proposed Tioga Hammond Dam will have on an area this far downstream from the above mentioned dam. Also, the construction of the riprap at this site should be carefully evaluated in terms of the potential force of the "flood way" during a 100 year or greater flood.

### General Comments on the Environmental Effects of Station Operation (Chapter IV)

The Council's staff believes more study is necessary on the impact of this facility on public expenditures for police, fire, and other special emergency equipment which may be needed not only in the immediate areas but also for backups in the event of a serious radiological accident.

Also, the NRC staff notes there might be additional land use impacts and that PP&L should take these items into consideration in its socio-economic monitoring programs, but the NRC staff does not point out who will have the responsibility to implement the anticipated programs which might be necessary to mitigate the effects relative to adverse land uses.

The Council encourages PP&L to finalize its replacement water plans as soon as possible and coordinate those plans with the Luzerne County Planning Commission, the EDCNP, the Pennsylvania Department of Environmental Resources (DER) and the SRBC.

The Council also believes the Luzerne County Planning Commission should submit an application to the U.S. Environmental Protection Agency under the Quiet Communities Program to secure the necessary funding to buy the noise monitoring equipment and to acquire the necessary expertise to develop a history of the noise level generated at and near the plant.



The Council also strongly encourages PP&L to perform the appropriate studies on the operation of the intake as currently styled and designed, since it appears it will have an adverse effect on the aquatic life within the vicinity of wing walls and riprap. These are crucial, since shad may be reintroduced in the lower reaches of the Susquehanna River and various fish ladders are being contemplated on some of the dams downstream from this proposed facility.

Also, it appears there are some inconsistencies in the evaluations on whether the shad will remain in the main channel or use the pool areas for resting. If the shad decide to rest in the pool near the intake, this may have significant negative results as they migrate up and down the river. In essence, the Council's staff believes the potential shad problem should be studied in more detail and solutions found as soon as possible to assist in the reintroduction of shad in the Susquehanna River.

The Council applauds PP&L for its proposed recreation centers around the plants, however, it wonders if PP&L also plans to permit public recreational use around its proposed low flow augmentation reservoir.

The Council again believes it is important to stress that the local communities should receive sufficient taxes or payments in lieu of taxes to cope with the increased level of services and manpower (police, fire, etc.) which will be required due to the impact of this facility. The Council believes the Luzerne County Planning Commission or Salem Township should submit an application to HUD or NRC to more fully ascertain these fiscal impacts and also to develop appropriate implementation strategies.

Also, the Council believes a survey of cultural resources (Indian relics, etc.) in the vicinity of the plant should be made as soon as possible in order to quantify the extent and value of these resources in the area of the plant.

The Council staff also found it interesting that approximately 80 percent of operational work force which was hired by November, 1978 were in-migrants rather than local workers. The Council believes PP&L should investigate the development of training/employment programs (for example, under PIC or OJT) with local CETA agencies such as the Luzerne County Human Resources Agency in order to encourage the hiring of more "local" people.

Although the total tax bill for the two Susquehanna units will be about \$5.5 million very little of this will be distributed locally. (\$55,000 to Luzerne County and \$10,000 to Columbia County due to current state law.

The Council's staff believes some more equitable formula should be pursued, even if it means possible amendments to the Pennsylvania Public Realty Tax Law.

#### General Comments on the Environmental Monitoring of the Plant Site (Chapter V)

The Council's staff concurs with NRC findings and recommendations in this Chapter and strongly urges PP&L to expedite many of them (i.e., the noise monitoring program mentioned earlier).

#### General Comments on the Environmental Impact of Postulated Accidents (Chapter VI)

The Council's staff believes the current EIS is deficient in that it did not note the TMI accident. The Council staff believes that since an accident such as TMI is possible, it believes it would be prudent for PP&L and/or the NRC to develop a plan for a Class 9 failure at this facility, especially since an accident of this magnitude was not considered in this EIS.

Again, the Council's staff recommends that NRC and PP&L review the Office of the Controller's report and the other publications noted earlier on this subject.

#### General Comments on the Need for the Plant (Chapter VII)

The Council's staff found this Chapter very informative and generally concurs that there is a need for the plant even though some may question the need to have the plant since PP&L would still have a 24 percent reserve margin in the summer without it in 1985; and a 30 percent reserve margin in the winter without it. Although the margins are significantly above the 5 percent reserve margin assigned to PP&L as its responsibility in the PJM interconnection; it appears PP&L acted in good faith in the late 1960's and early 1970's when it made the decision to go ahead with the facility, since it was assigned a 20 percent reserve margin at that time. Also, PP&L expected considerably more growth in its service area and the interconnection at that time. Furthermore, it now appears the State and the interconnect are indeed fortunate that PP&L is a winter peaking utility and has this reserve margin in light of the potential closing down of GPU's Three Mile Island plant, and also, the increasing need for energy in the United States due to the OPEC oil crisis in 1973-74 and 1978-79.

Furthermore, the Council's staff believes this reserve margin is a plus in the region's attempts to revitalize the economy of the region which to date has experienced high unemployment rates and little economic growth and diversification.

In essence, the Council's staff believes the additional reserve margin which the Susquehanna plant will provide (47 percent reserve margin in winter and 29 percent reserve margin in summer) by 1985 is a plus to the economy of the State and our region.

#### General Comments on the Evaluation of this Proposed Action (Chapter VIII)

Anthracite did not appear to be considered as an alternative. It may be a more viable fuel in the future in that it is exempt from the most recent SO<sub>2</sub> requirements promulgated by EPA. Other data was very technical and out of the Council's staff expertise or not directly related to the EIS statement.

#### General Comments on the Benefit Cost Analysis (Chapter IX)

The Council's staff generally concurs with the "bottom line" of this Chapter and the Council's staff believes that it would be possible to operate the station with only minimal environmental impacts if the applicant (PP&L and Allegheny Electric Cooperative, Inc.) follow through with the recommendations noted by the NRC staff in the EIS and the comments of the EDCNP which are noted in this review.

September 10, 1979

Mr. Howard J. Grossman, Executive Director  
Economic Development Council of  
Northeastern Pennsylvania  
P. O. Box 777  
Avoca, Pennsylvania 18641

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Dear Howard,

Your review of the Nuclear Regulatory Commission's Draft Environmental Statement (DES) is appreciated. In response to the questions raised in your August 27, 1979 letter, we offer the following:

1. As noted in the DES, the Susquehanna River is the source of water needed for the operation of Susquehanna SES. In 1976, the SRBC formulated regulations requiring flow augmentation by users of Susquehanna River water under certain conditions. To meet this requirement, PP&L proposed to build the Pond Hill Reservoir Project. An application for plan approval of the project was submitted to SRBC in March, 1979. The SRBC has not completed their review at this time.

SRBC recognized that some projects were well underway when their regulations were issued and that augmentation facilities could not be built prior to operation of the user facility. The regulations provide flexibility in establishing an effective date for each facility consistent with reservoir approval and construction schedules. Provided that approvals are granted in a timely manner, PP&L expects to put the Pond Hill Project in service in 1983.

2. All the facilities in the flood plain related to operation of the Susquehanna SES are designed to withstand the 100-year flood and remain operational. Examples of such facilities are the transmission towers and the river water intake structure. The impact of flooding substantially above the 100-year flood level is primarily plant shutdown due to loss of operability of the river water intake. Since the plant elevation is approximately 150 feet above the river level, there would be no impact and, consequently, no hazard to the public.
3. PP&L has made arrangements with the Berwick Hospital for the treatment of injured persons who might also be radioactively contaminated. The Berwick Hospital is the nearest hospital to the Susquehanna plant and is the logical choice for this type of service.

Other hospitals in the area must be considered in emergency planning, and to insure this, PP&L has been actively pursuing the formulation of adequate emergency plans with the Pennsylvania Emergency Management Agency, the Columbia and Luzerne County Civil Defense organizations and others. PP&L believes that area hospitals are addressed in the emergency plans developed by these agencies.

4. The Safety Evaluation Report (SER) is prepared and issued by NRC and is a necessary step prior to beginning public hearings on safety-related issues involving Susquehanna SES. The SER is unlikely to be issued before Spring, 1980. If you request a copy of the SER from NRC, they will forward it to you when it is issued.

If you require additional information, please feel free to contact me:

Very truly yours,



Paul R. Stewart

economic development council of northeastern pennsylvania  
proximity to market . . . a competitive edge.

North  
Megalop

August 27, 1979

Mr. Paul Stewart, Manager  
Consumer & Community Affairs  
Pennsylvania Power & Light Co.  
344 South Poplar Street  
Hazleton, Pennsylvania 18201

Dear Paul:

At the most recent meeting of the Policy Committee of EDCNP, a recommendation was made to defer action on the Nuclear Regulatory Commission's Draft Environmental Statement related to operation of the Susquehanna Steam Electric Station, Units 1 and 2, published June 1979, pending the receipt of a response to this letter. The Executive Committee confirmed this action at the August 23, 1979 meeting.

As you know, the PNRS Committee and staff spent considerable time evaluating the findings of the Draft Environmental Statement, at least those sections which the Council felt some competency to review and comment.

With respect to the review and comment, the Council's Policy Committee and Executive Committee requests additional background and the latest status report on the following elements which were noted in the Draft Environmental Statement:

1. With respect to water withdrawal from the Susquehanna River or with respect to a new water related project such as construction of a reservoir, please outline what actions will be taken to meet all water related needs relative to the Nuclear Power Facility at Berwick. The Council's Executive Committee is vitally concerned that the water related facility concerning the operation of the Nuclear Power Facility be on line at the time that the facility is officially opened.
2. The Draft Environmental Statement notes that flood plain consideration has been taken into account at least as far as the 100 year flood plain is concerned. Since the Pennsylvania Department of Community Affairs has noted that flood plain mapping may now be available for sections of the general area relative to the Nuclear Power Facility, the Council would appreciate the latest information being analyzed by PP&L concerning the impact of any potential flooding which may some time occur. Flood plain analysis for flooding substantially

Mr. Paul Stewart  
August 27, 1979  
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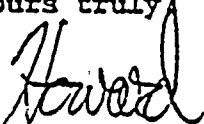
above the 100 year flood plain level would also be appreciated, if such analysis has been accomplished.

3. The Draft Environmental Statement notes special consideration for the Berwick Hospital. The Policy and Executive Committees believe that other hospitals should be involved in evacuation or emergency plans and would appreciate any details you might be able to supply concerning plans involving hospital facilities other than Berwick.
4. The Draft Environmental Statement notes that a Safety Evaluation Report (SER) is in the process of being prepared. The Council would like the opportunity of obtaining this document when available and would also appreciate your outlining the schedule for completion.

The Council has other elements which it would like to bring to the attention of the Nuclear Regulatory Commission concerning economic affects of the Susquehanna Steam Electric Station, Units 1 and 2, but the above four elements represent some of the major factors for which the Policy and Executive Committees would appreciate a response.

Please feel free to contact me if you need any further background concerning this request. In order to expedite the Review and Comment process, it would be helpful to receive some type of response by September 15, 1979.

Yours truly,



Howard J. Grossman  
Executive Director

EJG:mjc