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FROM: Arizona Clean Energy Coalition Tempe, Az. 85281 Kevin Dahl			DATE OF DOC 5-28-75	DATE REC'D 6-7-75	LTR XXX	TWX	RPT	OTHER
TO: NRC			ORIG 1 signed	CC	OTHER	SENT AEC PDR <u>XX</u>		SENT LOCAL PDR <u>XX</u>
CLASS	UNCLASS XXX	PROP INFO	INPUT	NO CYS REC'D 1		DOCKET NO: <u>STN-50-528/529/530</u>		

DESCRIPTION: Ltr furnishing comments on Draft Enviro Statement on the proposed Palo Verde Station....

ENCLOSURES:

AGREEMENT
DRAG

PLANT NAME: Palo Verde Station Units 1-2-3

FOR ACTION/INFORMATION **DHL 6-9-75**

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EXTERNAL DISTRIBUTION

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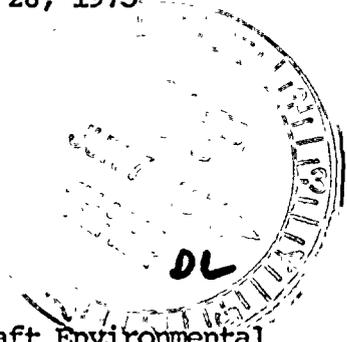
The page contains several lines of extremely faint, illegible text, likely bleed-through from the reverse side of the document. The text is scattered across the page, with some faint clusters appearing in the upper right and lower right quadrants.

STN-50-528
50-529
50-530



ACEC -- PHX
615 South Hardy #29
Tempe, AZ 85281

May 28, 1975



US NRC
Office of Nuclear Reactor
Regulation
Washington, D. C. 20555

Regulatory Docket File

Dear Sirs:

Following are my comments and observations on the Draft Environmental Statement (DES) on the proposed Palo Verde Nuclear Generating Station (Docket #'s STN 50-528, 529, and 530). I wish this statement to be made part of the record, included and responded to in the final environmental statement.

These comments are made representing the Phoenix Branch of the Arizona Clean Energy Coalition (ACEC-PHX) and the Arizona Friends of the Earth (AzFOE).

Overall, the statement should be complemented for using small print and using both sides of a sheet. This is rare when a bureaucracy prepares an Environmental Statement (ES), and contrasts sharply to APS's wastefully printed documents.

Following are comments on the DES sections:

The foreword was helpful.

Pg. 1-1. First paragraph: How was "net" determined when 1239 MWe was claimed as net electrical output? Did APS or NRC develop that figure?

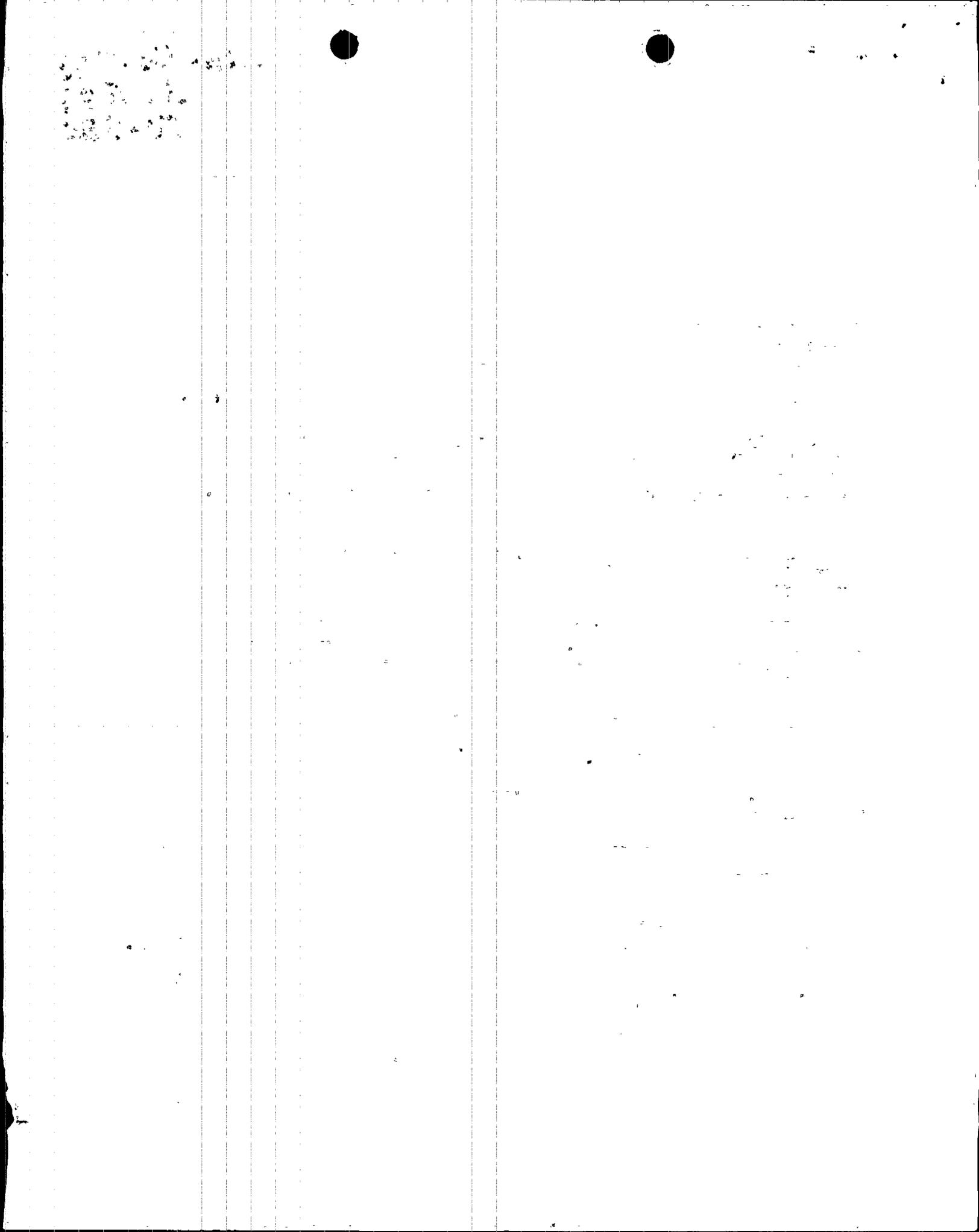
First paragraph: "will be the sole source of cooling water" is APS committed to this, and in what way committed besides having an option on a contract.

Sixth paragraph: Other places ES, ER, and PSAR are available (A.S.U.) should be listed, and a list of who received D.E.S. would be helpful.

Seventh paragraph: A list of permits (Table 12.1-1 in ER) should be reprinted in D.E.S.

Pg. 2-5. Third paragraph: Will data in Table 2.1 be revised due to these two possible developments? Is there an economic impact on the developer?

6213



Pg. 2-8. Fifth paragraph: Has APS checked with the Arizona Academy of Science (contact - Dr. Gordon Bender or Dr. E. Lynwood Smith; both at ASU) for potential natural areas? Az has no established natural area system, so these potential natural areas are just as important. I don't recognize any from the map, except that the transmission line passes close to Table Top Mountain, just north of the Papago Reservation.

Pg. 2-9. First paragraph: Mitigating measures should be clearly explained and approved of by Az Academy of Science (or someone with Archeological expertise). I don't like phrase-- "appropriate to any newly discovered resource" What about Reeves and Davis ruins -- they aren't newly discovered. As long as we know these exist, the exact measures to prevent their destruction should be spelled out explicitly.

Pg. 2-9. Second paragraph: I am pleased the staff has thusly concluded, however, it might be nice for the public and the scientific community to have enough information to either concur or object.

Pg. 2-16. Entire page: Fig. 2.8 is ugly! And, realistically, too confusing to be of much use except to perhaps a few electrical engineers. A regular map of the area should be included also, or instead.

Pg. 3-12. Second paragraph: Is a 40-year life assumption valid, or only required? What is more realistic? Is this figure used throughout the D.E.S.?

Pg. 3-19. Fourth paragraph: The statement of the solid waste disposal system being acceptable with no sort of discription or discussion is unacceptable. This section must be expanded.

Pg. 3-20. Table 3.5: What are the possible health hazards of these concentrations and the effects of a factor of 10 greater concentrations? The raw numbers are not enough; please make clear the effects of various numbers.

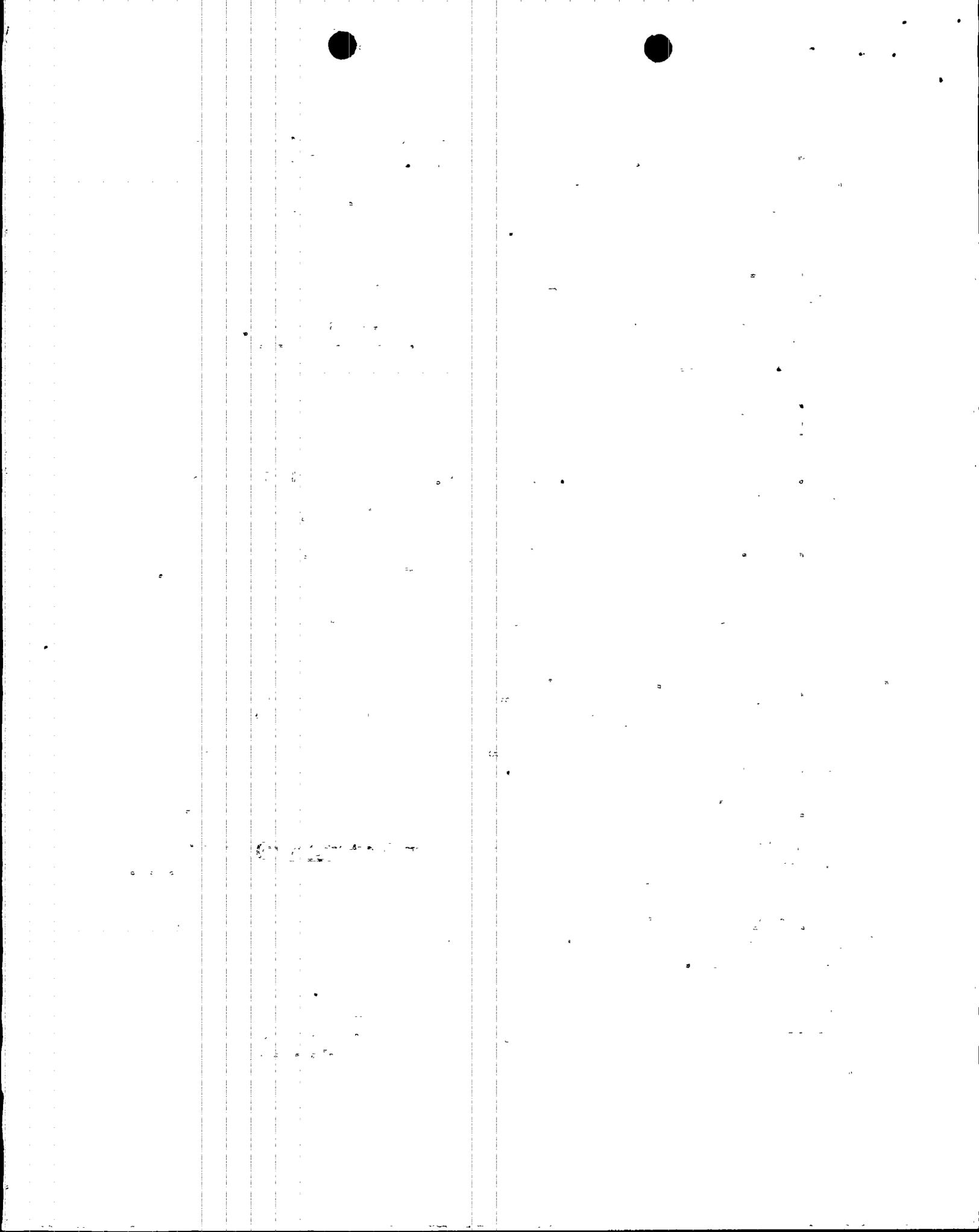
Pg. 3-26. Second paragraph: A separate Environmental Statement (ES) for trans. lines is called for.

Pg. 3-27. First paragraph: BLM echos our concern for natural areas.

The effects of high voltage lines (see Power Over People, L. B. Young) impacts of transmission lines have not been adequately discussed in the D.E.S., another argument for a separate statement.

Pg. 4-2. The section on transmission corridors leaves out the impact of leaving construction roads in areas previously unaccessable by vehicle and impacts on wildlife.

Pg. 5-1. Sixth paragraph: Is good! Perhaps relocation of route, closer to highways (where people can develop a healthy distaste for power lines) is necessary to avoid these natural areas. Table Top Mountain is not a proposed park, but a proposed primitive area and qualifies for inclusion in the National Wilderness Preservation System. (as does Sawtooth Mountain).



Pg. 5-6. Second paragraph: It may be as low as practicable in accordance with the laws, but will it have any health impact? Is it safe?

Pg. 5-10. Seventh paragraph: Again, minor contributor and as low as practicable if its safe then say so!

Pg. 5-15. First paragraph: What would be the impact if this assumption is not made? If other water users contribute to make the water the Nuclear uses the marginal water needed by the riparian area. What would be the impact then?

Pg. 5-23. Esthetics: Somewhere should be mentioned (perhaps in this section) the impact on the human community a huge nuclear accident elsewhere would have here. Maybe this should be in chapter on postulated accidents.

Pg. 8-9. Through pg 8-11: Section on energy conservation seems inconclusive and not helpful. Logically, the utilities should be required to attempt real conservation measures before the need for a nuke is established.

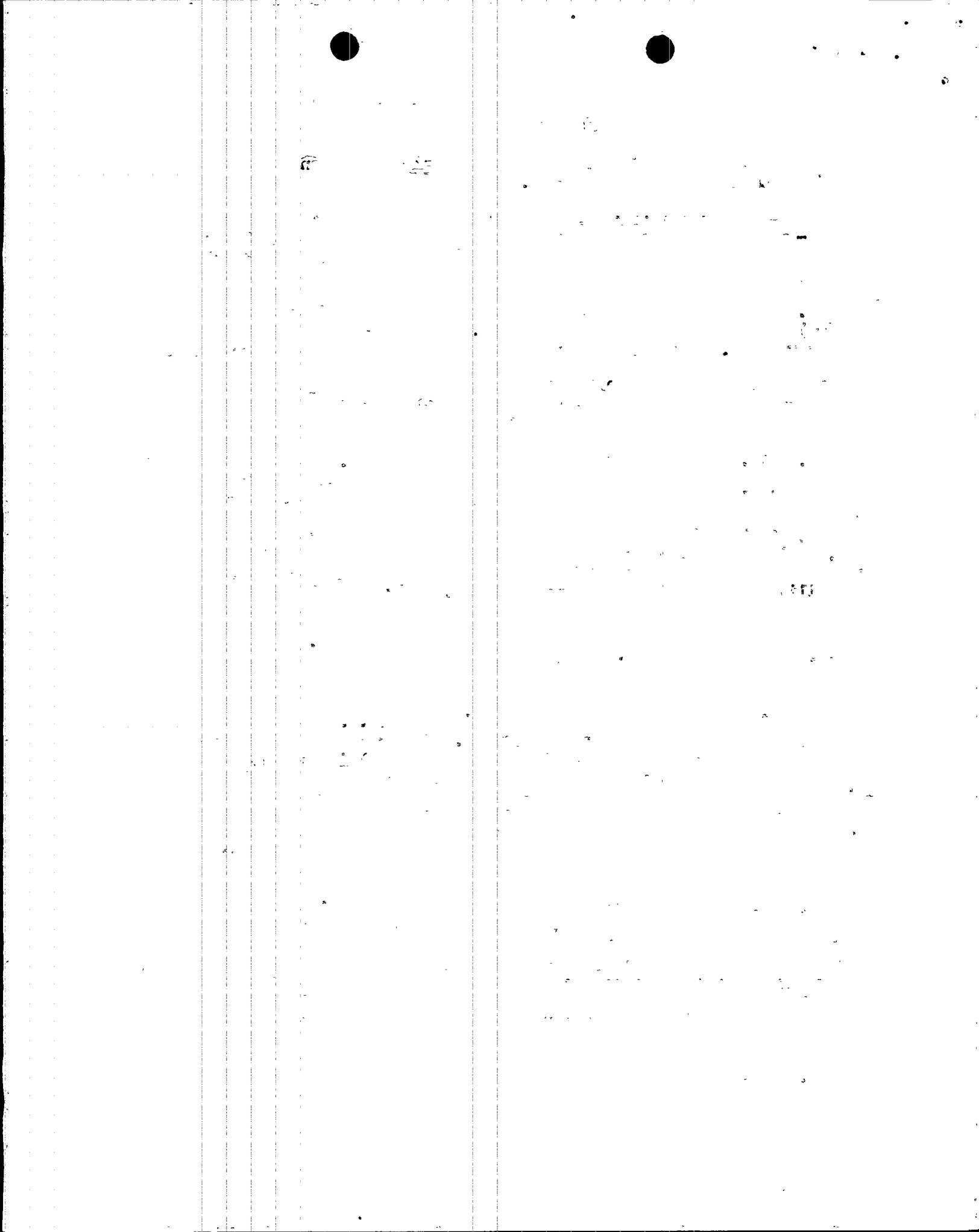
Pg. 8-11. Fourth paragraph: "There do not exist. . .". A qualifying statement to the effect that rate changes may include be a better alternative should be included here. Plus, if the data isn't here, the D.E.S. is not acceptable until such data is made available. The purpose of E.S. is to assure that all information was available before an irreversible decision is made. This information is vital, for if a route change could eliminate the need for a nuke and it was not known by ANPP or NRC at this time, then they are making a big mistake with grave economic, environmental and health impacts on the consumers and the area.

Pg. 8-13. First paragraph: Is the Palo Verde a base-unit, in reality? Or will the troubles associated with nukes make it more often used as a peaking unit?

Pg. 8-14. Eighth paragraph: "the desirability. . ." This should be nipped in the bud -- it is very undesirable. Strict energy conservation measures (in case of Arab-caused shortage or whatever) is much more desirable than nuclear. We strongly object to this statement -- The determination of this question is what the impact statement (and alternative section in particular) is all about. It shouldn't be used as an argument to discount energy conservation. Also in this section it should be mentioned that electricity is a less desirable form of energy because fuels used at the place of needs is much more efficient.

Pg. 9-1. Second paragraph: The last sentence explaining why the NW-SW hook-up is unfeasible was unclear. Why exactly (documented) wouldn't this work? I guess 3 load curtailment should be given stronger emphasis, not only as an alternative, but as a reasonable and necessary thing to do anyway. As a compromise with conservation maybe fewer units of the PUNGS need ever be built or some smaller alternative conservation as a partial solution should be pushed, eliminating wasteful practices, lifestyle changes should be encouraged, also.

Pg. 9-13. Besides a present worth comparison in dollars, a present worth



comparison in net energy. This could be graphed to capacity, and separately to dollar cost and (with caution) to environmental cost. I think it very important that at least one of these linear models be prepared. An economic analysis without net energy consideration is partly worthless for making decisions, unless of course you are only in it for the money.

Pg. 9-8. Second paragraph: I outright reject any use of Project Independence (and its goals) in any decision making. In the public eye it should be an inappropriate system as it failed to live up to its commitment of public involvement. The final plan was finalized before public hearings were complete and the promised second round of public review never materialized. Project I is a holdover of Nixon energy policy; it's a sham. I don't know about using Fuel Oil and Gas, but Project Independence should have no bearing on it. At least, not without further rationale and details.

Pg. 10-2. Second paragraph: "low as practicable" does not logically rule out "adverse radiological consequences." Better explanation is needed here.

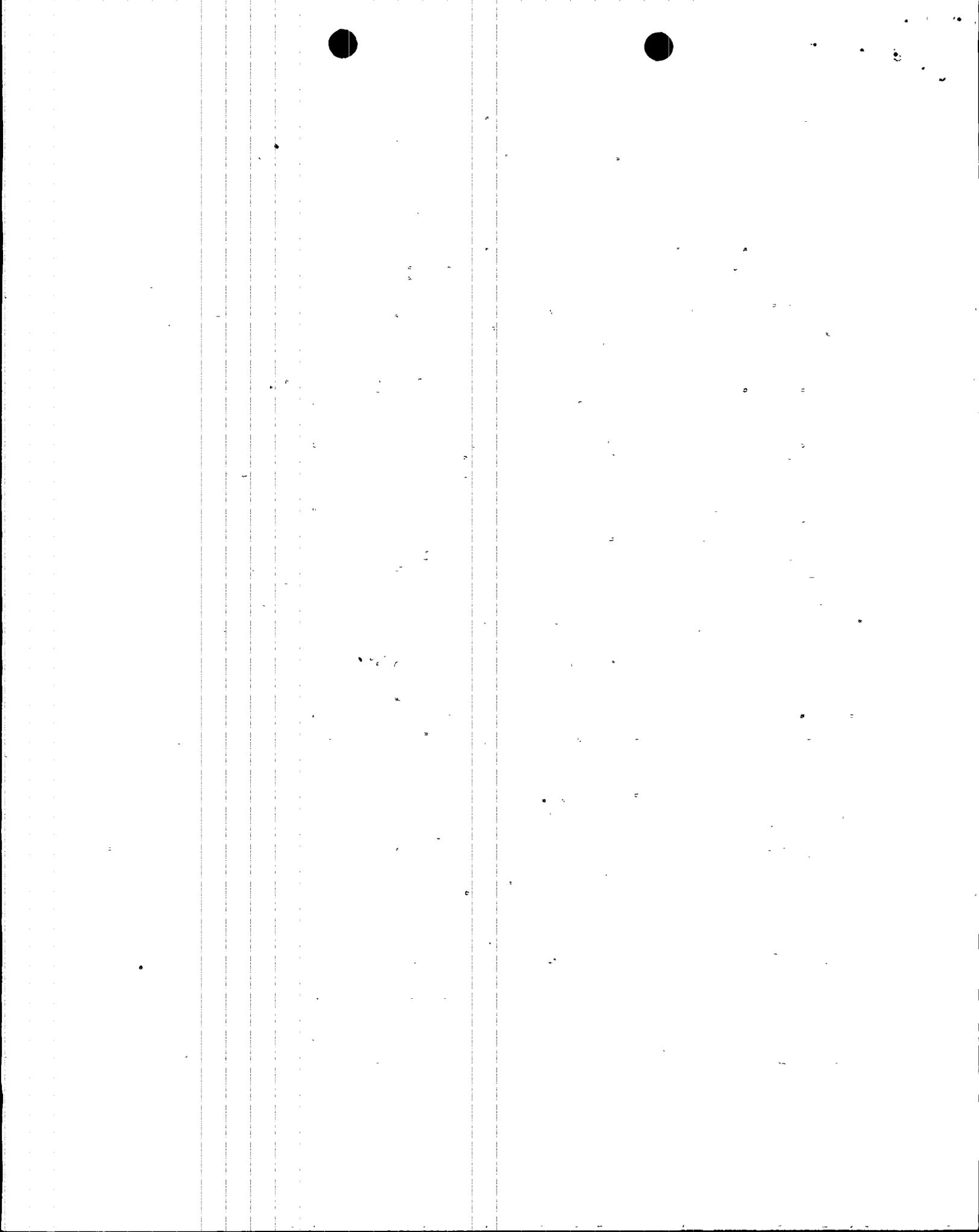
Pg. 10-2. Sixth paragraph: Waste water used by the plant could be used for other uses -- ground water recharge, even municipal use. I do not view its use in the PUNGS as cooling water as an "enhancement of productivity".

Pg. 10-3. Ninth paragraph: Something better be explained about the annual \$100,000 maintenance charge. If it is constant in real dollars (or, even not) then eventually it will cost more in present dollars than the return of the utilities investment (in present dollars). It had better diminish in time and eventually cost \$0.00 or then in logical economic thinking the dead nuke is going to be one big albatross around ANPP's neck!! Does the \$70 million figure include this annual charge? How long does ANPP plan until complete restoration? Although this isn't supposed to be finalized until later, this economically could make a big difference. The economic (Purely \$) analysis on page 10-6 says present worth benefits is about \$2.2 billion. Costs on next page is listed as \$3.67 billion. The utilities are losing a billion and a half dollars. If those figures are correct I can say conclusively as a student of economics that no businessman, would build a nuke and lose \$1.47 billion.

The statement in section 10.4.1 that customers will benefit from increased system reliability is not only documented but can be shown to be false. (see Camey, Bulletin of the Atomic Scientists, Nov. 1974, Feb. 1975). A benefit/cost analysis in terms of the net energy should be required. The output of PUNGS compared to alternatives must be determined using the net energy balance to determine the true benefit/cost.

Pg. 10-8. Seventh paragraph: Although a reduction in costs is not likely from alternatives a great increase in benefits (most in non \$ terms) can be expected and greatly out-weights the used or desirability of a nuclear plant.

The need for PUNGS has not been shown by this statement nor has it shown acceptable environmental impacts. Benefit/costs using more realistic capacity factors (50% not 70% or 80%), net energy balance, more realistic water use assumptions and the impact of a concerted conservation/alternative source



program must be produced for the final statement.

Thank you,

Kevin Dahl

Kevin Dahl
Coordinator ACEC

