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Docket No. 50-289 & 50-320

Daniel R. Muller, Assistant Director for Environmental Projects, L

COMMENTS ON PROPOSED FINAL ENVIRONMENTAL STATEMENT FOR THREE MILE ISLAND

PLANT NAME: Three Mile Island Nuclear Station, Units 1 & 2
 LICENSING STAGE: OL
 DOCKET NUMBER: 50-289 & 50-320
 RESPONSIBLE BRANCH: Environmental Projects Branch #4
 PROJECT MANAGER: J. Jenkins
 DATE REQUEST RECEIVED BY CBAB: November 22, 1972
 REQUESTED COMPLETION DATE: November 27, 1972
 DESCRIPTION OF RESPONSE: Comments on proposed final environmental statement.
 REVIEW STATUS: Complete as regards cost-benefit analysis

Enclosed are comments on the proposed final environmental statement for the Three Mile Island Nuclear Station. These have been discussed informally with the Project Manager on November 27, 1972.

Original signed by
 H. R. Denton

Harold R. Denton, Assistant Director
 for Site Safety
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Enclosure:
 As stated

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COMMENTS ON PROPOSED FINAL ENVIRONMENTAL STATEMENT
FOR THREE MILE ISLAND

Summary and Conclusions

In the second sentence of the second paragraph of item 2, the figures given are gross electrical capacities, before deducting for the power required to operate the station. The figures used in Sections X and XI are net electrical capacities, 830 megawatts for Unit 1 and 950 megawatts for Unit 2. To avoid confusion, these figures should also be used in the "Summary and Conclusions."

In item 3.d, there should be some indication of whether these radioactive effluents are serious or not. Perhaps a better way of treating the subject here is to give the total population dose as a percentage of the natural background.

Section VIII

At the end of the discussion of decommissioning on page VIII-2, the following might be added:

"Although the applicants have not formulated plans for permanent shutdown of the Three Mile Island Station, they have estimated for Unit 1 that the cost of shutdown measures comparable to those for Hallam would not exceed \$6,000,000 based on current dollar values, plus \$50,000 per year to cover the cost of round-the-clock surveillance and periodic maintenance to fences and barriers. (Application for operating license as revised on May 26, 1971.)"

Attached is a copy of pages of interest from the application for an operating license for Unit 1.

Section IX

In the third sentence of the second paragraph on page IX-1, the consumption of U-235 should be given as 48 metric tons for 30 years of operation, instead of 63.5 metric tons for 40 years, in order to be consistent with Part B of Section XI.

Section X

Perhaps the third paragraph on page X-3 should be deleted as stating a conclusion before the facts are presented. The next paragraph on the same page and the paragraph on "Purchase of Power" on page XI-1 give a more detailed discussion of the subject.

In the first sentence of the fourth paragraph on page X-3, reference should be to Table 22 instead of Table 20.

Section XI

On page XI-1 in the second sentence of the third paragraph, the reference should be to Table 22, not table 15.

On page XI-2 at the end of the subsection on "Coal-Fired, Base Load Generation," it is suggested that the following be added as a new paragraph: "A comparison of a coal-burning plant with the Three Mile Island Nuclear Plant is given in Part B of this section."

On page XI-2, it is suggested that the second sentence of the paragraph under "Oil-Fired, Base Load Generation" be changed to read: "A comparison of an oil-burning plant with the Three Mile Island nuclear plant is given in Part B of this section."

On page XI-10 in the entry in the table for "Fuel" for the TMI Nuclear Plant, change "450 t/yr" to "330 t/yr." This will then be consistent with the second sentence of the third paragraph on page XI-14.

On page XI-10 in the entry in the table for "Gaseous radwaste" for the TMI Nuclear Plant, the figure of "9.4 man-rem/yr to population within 50 miles" does not seem to be given in Section V.

On page XI-10, footnote a should refer to subsection B.1 "below" instead of "above."

On page XI-11 in the entry in the table for "Radiological" for the TMI Nuclear Plant, the figure of "20.9 man-rem/yr to population within 50 miles" does not seem to be given in Section V. The same figure appears in the third sentence of the first paragraph on page XI-16.

On page XI-11 in the entry under "Accidents" for coal-burning and oil-burning plants, the word "change" should be "chance."

On page XI-12 at the end of the first sentence of the second paragraph, it is suggested that the following footnote be added:

"This cost estimate and the others given below are based on the Applicants' Environmental Report submitted to the AEC in December 1971. In a Quarterly Progress Report on Status of Reactor Construction as of September 30, 1972, provided to the AEC by the GPU Service Corp., the total cost of the nuclear production plant for TMI Units 1 and 2 was indicated at \$780,000,000 of which about \$402,000,000 was the cumulative cost at a time when completion of physical construction was 90% for Unit 1 and 31% for Unit 2. A current comparison with the costs of a coal-burning or an oil-burning plant would need to include the effects of cost escalation on those plants."

On page XI-12, it is suggested that the third sentence of the second paragraph be rewritten as follows: "The annual operating cost is estimated as \$23,300,000 including nuclear fuel at 1.3 mills per kilowatt hour and nuclear insurance and operation and maintenance at 0.57 mills per kilowatt hour; the present worth for 30 years of operation is \$234,000,000."

On page XI-12 in the ninth line of the third paragraph, change "0.5 mill" to "0.51 mill."

On page XI-12 in the fourth line of the fourth paragraph, change "0.4 mill" to "0.41 mill."

On page XI-13, the last sentence on the page should be rewritten as follows: "The conclusion is that incremental costs for abandonment of the TMI plant and construction and operation of a fossil-fuel plant would be \$500,000,000 to \$650,000,000 more than for completion and operation of the TMI plant, not including the cost of restoration of the TMI site."

On page XI-14 in the third sentence of the third paragraph, change "246,000 tons" to "275,000 tons." (The figure of 246,000 tons is for the end of 1970, not 1971.)

On page XI-15 in the second sentence of the third paragraph, the total population dose within 50 miles of the plant is given as 42 man-rems per year, which agrees with the last paragraph on page V-28 but not with the second paragraph on that page.

On page XI-15 in the third paragraph, the subject is supposed to be gaseous radioactive effluents, but the total population dose given is for all effluents. This paragraph should be made consistent with the entry for "Gaseous radwaste" in the

table on page XI-10.

On page XI-15 in the first sentence of the third paragraph, the average dose to an individual at the site boundary of 3.8 millirems per year does not seem to be given in Section V.

On page XI-15 in the fourth sentence of the last paragraph, "0.5\$" is a typographical error and should be "0.4%."

On page XI-17, the second sentence of the fourth paragraph should be rewritten as follows: "More than 52,000 people had visited this center by December 1971 and had participated in a number of educational programs."

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