

# The Conservation Law Foundation of Rhode Island

70 SOUTH MAIN STREET  
PROVIDENCE, RHODE ISLAND 02903  
(401) 861-7550

S. Arlene Violet,  
Counsel

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Comments to U.S. Nuclear Regulatory Commission  
Re: Draft Environmental Impact Statement on NEP # 1&2  
By: The Conservation Law Foundation of Rhode Island

These comments are in response to the Draft Environmental Impact Statement (DEIS) issued by the Nuclear Regulatory Commission (NRC) on the proposed New England Power (NEP) Units 1 & 2. They are submitted despite knowledge of the motion by Concerned Citizens of RI (CCRI) (7-13-79) for reconsideration of acceptability of the NEPCO application, in the event that a decision favorable to CCRI is not found.

CLF/RI's comments and questions encompass several points.

1. Although the statement claims a long-term negative impact on terrestrial and aquatic wildlife if the nuclear power plant is built, this assessment is made with a paucity of data on the ecological effects of thermal backflushing. On page 10-11, it is stated that such backflushing will cause short (two hour) periods of elevated temperature up to 120°F either once or twice monthly. The hot water would be expected to mix rapidly with the Sound water as it is discharged, so to decrease the temperature. Also, the statement adds that organisms should be able to endure brief thermal shocks. This assertion is presented without supporting scientific data, as to how high a temperature might be withstood, or for how long. We would maintain that a two hour expulsion of 120°F water would pose serious ecological threats to marine life in Block Island Sound, and that further data is needed to disclose the actual impact on the system.

2. It is not clear under what justification the applicant is requesting an exception from EPA to use a once-through cooling system. This system does not satisfy the Federal Water Pollution Act guidelines for best available technology, as it would pump water used for

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cooling back into the Sound with no controls. The thermal effects of this discharge on the ecology of the Sound, again, is not adequately discussed.

3. Figures from local and statewide polls are presented on pages 45, 50, 51, which show that more people both locally (in Charlestown) and statewide oppose the construction of NEP 1 & 2 than approve. No mention is made as to whether these opinions constitute a social impact which must be weighed in the final decision. We would maintain that public opinion of the facility would effect the working environment and efficient running of such a plant in this state, and should be considered a social impact in the EIS.

4. Rate restructuring is discussed to the point that the DEIS admits that incentives may be created to shift use from periods of peak demand to off-peak periods, but notes that participation in such programs is optional. However, further discussion of the potential benefits of mandatory participation in these programs should be considered as a partial alternative to building NEP 1 & 2.

In the same section, the statement claims that, while rate restructuring may reduce peak generating capacity, this would have no bearing on the need for base load generating facilities such as NEP 1 & 2. We feel that, should there become an excess in peak power, all efforts to divert that power to base load use should be made before building any additional facilities. The feasibility of such a diversion was not addressed, yet is a pertinent factor in the determination of the need for new facilities.

5. The Staff recognizes only two types of conservation which may affect demand for electricity: (1) voluntary conservation in response to higher prices, or (2) mandated government programs. First, this ignores less 'painful' conservation measures more easily implemented through consumer education, such as use of insulation, reduced wastage, and wise use of appliances. Secondly, Even without conservation measures which could result from such an educational program, the DEIS acknowledges the importance of conservation as an alternative to the NEP units. "From this review, staff concludes that although mandated conservation programs are uncertain, if enacted they could result in significantly delaying the need for generation capacity represented by NEP #1 & 2 beyond the period which staff has forecast in Section 8.5.1." (8-10) Such a delay could then make acceptable and timely the use of solar space and water heating (as discussed in Section 8.2.3), which, without conservation, would not have been economically feasible at the time of need for NEP 1 & 2. The option for employing conservation measures until such time that solar technology is feasible and prudent, is implied to be a viable alternative according to the DEIS, if one correlates statements from two sections. However, the statement fails to address this option as a comprehensive energy strategy.

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6. CLF/RI has entered the NRC hearings on NEP 1 & 2, on the grounds that the facilities are of questionable need, even without the aid of conservation measures. Utility forecasts of demand have proven too high when checked against figures of actual consumption. For one example, the 1970 peak load forecast for the 1973 NEPOOL system was 17% over the actual 1973 load. (Booz, Allen, & Hamilton, Electric Power Demand and Supply in New England: A Review of Trends and Forecasts, Jan. 15, 1975, p. III-3) As is further outlined in our Petition to Intervene, February, 1977, our contention is that excessive reserves will be produced in the mid 1980's in New England, due to overestimated peak loads, and uncertain demand forecasting.

Also, the DEIS recognizes (page 8-17) "from the standpoint of the applicant's required reserve margins, the NEP 1&2 plants are not needed for reliability until sometime after 1990 at the earliest." The justification for allowing their construction for an earlier target date is that early operation will substitute for the use of imported oil. This ignores the fact that excess reserves are a real possibility and therefore, that the NEP units may be unnecessary and economically unsound.