January 16, 1979

Note to Don Neighbors, Project Manager, ORB #1

Re: Preliminary Determination Not to Prepare EIA on Steam Generator Plugging at Surry 1 & 2

As we discussed, although I agree with the determination that the action should be prenoticed as involving a significant hazards consideration, I disagree with the determination that no EIS or EIA/ND is required.

The requested amendment would authorize an increase in the number of steam generator tubes which can be plugged (from 25% to 28%) without a reactor power decrease. Vepco submitted a new ECCS to support its request.

The basis for decision on the proposed NEPA action states that there would be no change in environmental impact. It appears to me that the authorization of additional plugging will result in an increase in the doses to the workers who will do the plugging and may increase environmental impact. Also, but for the action a decrease in power level would result. The action directly affects human beings and requires at least an analysis of whether the impact is significant. If it is not significant, the staff may issue an EIA/ND. If it is significant, the staff must issue an EIS.

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