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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Mr. Robert T. Kratzke
SNM Project Manager
U.S. Nuclear Regulatory Commission
Washington D.C. 20555

JAN 8 1979

Dear Mr. Kratzke:

These are Region IX's comments on the Rough Draft Environmental Assessment of the General Electric Company Vallecitos Nuclear Center SNM-960 license. The comments are not meant to be all inclusive but they do reflect our major concerns.

The primary items that need to be addressed in the Rough Draft are: (1) a better description of the ground and surface water hydrology in the area; and (2) a better description of the tritium production and release from all pathways (including air). These two items are inter-related and are now an issue with state and local regulatory agencies. We believe the assessment needs to contain good maps and a better description of water resource development in the Alameda Creek Basin to justify some statements made in the Rough Draft (e.g. the statement on page 5-7 concerning the Sunol filtration beds is not clear). Also, tritium concentrations in Nile Cone groundwater have been measured (by Lawrence Livermore Laboratory) and this data and their significance should be discussed. Furthermore, the changes in hydrology and resulting influence from VNC discharges that would occur when LAV wastewater is removed from Alameda Creek should be evaluated. Finally, it appears there could be significant quantities of tritium leaving the site as atmospheric releases. Tritium is apparently not measured in any of the stacks. The significance of this pathway needs to be estimated.

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Since Chapter 7, "Environmental Effects of Accidents" was not included in the document we are unable to comment on this important aspect of site operations. We are particularly interested in an evaluation of the consequences of possible airborne releases from explosions, criticality, earthquakes, etc. Also of interest is: (1) the potential for downstream contamination due to unexpected liquid release, especially to the Nile Cone recharge area; and (2) the extent to which liquid releases might be retained on site.

The following comments are offered on specific items in the Rough Draft.

Page 2-29. The reference to Marin City in the Table should probably be Marin County.

Page 3-6. The statement that releases which are a small fraction of acceptable concentrations are automatically ALARA is questioned.

Page 3-7. Not monitoring non-radiological air emissions is perhaps unfortunate. However, a better effort should be made to quantify the various volatile chemical usage and loss so that the reasoning behind the opinion is understandable.

Page 3-8. It would be useful to give quantities of hazardous and non-hazardous wastes disposed of off-site.

Page 3-17. The statement that radioactivity in wastewater is hardly distinguishable from the fresh water supply is not true with tritium, where the average 66,000 pci/l concentration is two orders or magnitude greater than background.

Pages 3-18 and 3-21. It not clear whether the wastewater effluent in Table 3.3-V is only from the SNM-960 license or not. Also, there are questions on units under airborne releases and an uncertainity of what the two total values under wastewater effluent refer to.

Page 3-7. The statement that discharge of VNC waters into Vallecitos Creek can only enhance quality of water is probably true for TDS and most chemical parameters but it would not be true of tritium or nitrate contamination.

Page 5-15. Tritium concentration relative to background should also be discussed.

Page 5-22. I believe Table 5.3-III is supposed to be only for SNM-960 license, but the krypton-85 dose is for the entire site.

Page 5-23. The thyroid dose from pasture in Table 5.3-IV appears inconsistent with 5.3-III.

Page 5-23. It would be better to give measurement or calculation of direct radiation dose at the boundary rather than say only that it is less than 1 mrem/yr. Also, this statement is not consistent with discussion on dosimeter measurements on page 6-3.

Page 5-24. It would be helpful to postulate the maximum dose to an off-site individual from transportation, taking into account any unusual site or area transportation conditions.

Page 5-26, 27. The assumptions that 1 million people drink water from Alameda Creek and eat food from one field gives a calculated man-rem dose that is unrealistic. It would be better to estimate more accurately the upper limit of usage that is feasible and to calculate that number.

Page 6-4. Are surface water and vegetation tritium analyses made?

Thank you for the opportunity to comment on the Rough Draft. If you have any questions regarding our comments, please contact Jim Channell (415)556-4606.

Sincerely,

David L. Calkins, Director
Office of External Relations