



DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20201

August 8, 1979

Mr. Ronald L. Ballard, Chief
Environmental Projects Branch 1
Division of Site Safety and
Environmental Analysis
Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Ballard:

The Department has reviewed the draft environmental impact statement on the New England Power Units 1 and 2 (NEP 1 & 2), Block Island Sound, Charlestown, Rhode Island. Our comments are attached.

Sincerely yours,

Charles Custard
Director
Office of Environmental Affairs

Attachment

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MEMORANDUM

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
PUBLIC HEALTH SERVICE
FOOD AND DRUG ADMINISTRATION

TO : Charles Custard
Director, OEA

DATE: July 20, 1979

FROM : Consultant
Bureau of Radiological Health (HFX-4)

SUBJECT: Comments on DEIS - New England Units 1 and 2 (NEP 1 & 2)

The Bureau of Radiological Health has reviewed the health aspects of the subject DEIS and has the following comments to offer.

Section 5.4.1 Radiological impact on man

The predicted dose commitments to the maximum individual from radioiodine and particulate releases are listed in Tables 5.12 and 5.13. The individual doses for units 1 and 2 are within Appendix I, 10 CFR 50 design objectives. However, in view of EPA's Uranium Fuel Cycle Standard (40 CFR 190) which becomes effective December 1, 1979 a statement should be added indicating that NEP 1 and 2 will meet this standard. Since the plant is expected to come on line after the effective date of the EPA Standard a footnote should be added to Table 5.12 citing the numerical standard and total quantity limitations for normal operations. Recognition of this standard should also be acknowledged in Section 5.4.1.6 since it appears that the actual radiological impact of plant operations may result in doses close to the design objective. That is, the 40 CFR 190 Uranium Fuel Cycle Standard will be the appropriate radiation protection standard after December 1, 1979.

The transportation of radioactive material discussed in Section 5.4.1.4 is not considered to be adequate with respect to the transport of low level radioactive waste to the burial ground. The section should be expanded to indicate that adequate measures exist to insure public safety during shipment. For example, the Governor of the State of Nevada closed the Beatty site for a period of time because accidental leakage of radioactive material could cause a public health problem. It should also provide an assessment of the facilities that could be expected to be available for receiving the waste. Further, footnote (a) for Table 5.17 cites the Federal Radiation Council guidance of 500 millirem per year for individuals in the general population. As stated previously, effective December 1, 1979, 40 CFR 190 will be the appropriate standard and the maximum individual whole body dose will be 25 millirem. (Page A-10, 40 CFR 190)

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6.1.3 Radiological

The operational offsite radiological monitoring program should be reexamined to determine if the modifications are required in the type of sampling and sampling location and collection frequency to assure that timely population exposure data would be available in the event of an accident.

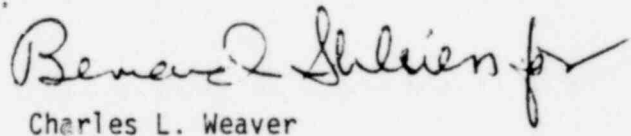
Section 7 Environmental Impact of Postulated Accidents

The experience from the Three Mile Island accident shows the need for the addition of a section on emergency response plans. Such a section should include a summary of the critical aspects of the detached emergency response plan which will provide assurance that adequate plans exist and have been tested. We believe that including such a discussion in the DEIS would serve to point out the key actions that would be taken to protect public health and safety in the event of an accident.

The monitors located at critical points in the plant should be reexamined to assure that adequate data would be available for making timely decisions in the event of an accident. Further, provisions should be made so that post accident samples of reactor coolant water in the containment atmosphere can be made to provide an early indication of any potential public health problems.

2.9 Attitudes Toward NEP 1 and 2

It is noted from the discussion in this section that there is opposition in the town of Charlestown for the use of the abandoned Navy Auxiliary Landing Field (NALF) as the site for NEP 1 and 2. Since publication of the DEIS, it is my understanding from reading Nuclionics Week that this site has not been approved and that the New England Power Company is looking for an alternate site.


Charles L. Weaver

cc:
Dr. Taylor (HFV-2)

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