



UNITED STATES DEPARTMENT OF COMMERCE
The Assistant Secretary for Science and Technology
Washington, D.C. 20230
(202) 377-3444 4335

April 2, 1979

Mr. William H. Regan, Jr.
Nuclear Regulatory Commission
Environmental Projects Branch 2
Washington, D.C. 20555

Dear Mr. Regan:

This is in reference to your draft supplement to the final environmental impact statement entitled "Pilgrim Nuclear Power Station Unit No.2". The enclosed comments from the National Oceanic and Atmospheric Administration are forwarded for your consideration.

Thank you for giving us an opportunity to provide these comments, which we hope will be of assistance to you. We would appreciate receiving seven copies of the final statement.

Sincerely,

Sidney R. Galler
Deputy Assistant Secretary
for Environmental Affairs

Enclosure: Memo from
NOAA-National Marine Fisheries Service

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UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Federal Building, 14 Elm Street
Gloucester, Massachusetts 01930

March 15, 1979

FNE62:RR

TO: EC - Richard Lehman
THRU: *John M. Barber, Jr.* MAR 28 1979
for #7 - Kenneth Roberts
FROM: *Warren F. Boman*
FNE - Robert W. Hanks

SUBJECT: NMFS Comments on Draft Supplement to FEIS - Pilgrim
Nuclear Power Station Unit No. 2 -- DEIS #7902.31

The Draft Supplement to the FEIS that accompanied your memorandum of March 1, 1979, has been received by the National Marine Fisheries Service (NMFS) for review and comment. The supplement has been reviewed and the following comments are offered for your consideration:

General Comments

The repeated assertions in the supplement that anticipated impact to the fishery at the Rocky Point site is negligible should be more qualified, given the uncertainties of projecting long-term impacts. Fish kills have occurred at the Rocky Point site during operation of Unit No. 1, and although they are not large enough to indicate significant impact on the fisheries at this time, they are matters of serious concern to the NMFS.

Moreover, although the level of analysis is sufficient for the present purpose, further investigation, review and comment would be required should the future bring about proposed developments of any of the alternative sites for power plant or other purposes.

Specific Comments

Page 38, para. 2: The statement appears here that there is the possibility that the shortnose sturgeon exists in the Merrimack River. The NMFS feels there is a high probability that shortnose sturgeon can be collected in the Merrimack River, given the presence of the shortnose in estuaries connecting to the river.

Pages 119-126: This section includes several statements about potential impacts to the shortnose sturgeon, and refers to the NMFS threshold determination, which "revealed a probable



impact" but stated that data available were insufficient to form a complete biological opinion. The NMFS feels that additional information is still needed, and that it is unjustified at this stage for the DEIS Supplement to conclude that, "Losses associated with impingement should have no effect on resident or anadromous species" (p. 124), or "...no detectable impact to the Holyoke Pool population of shortnose sturgeon will occur" (p. 126).

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cc: F7(3) ✓
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