

UNITED STATES
ATOMIC ENERGY COMMISSION
WASHINGTON, D.C. 20545

OCT 24 1974

D. R. Muller, Assistant Director for Environmental Projects, L

ENVIRONMENTAL TECHNICAL SPECIFICATIONS
DUKE POWER COMPANY, OCONEE

We recommend a revision be made to clarify Specification 1.4.A of Appendix B Technical Specifications for the Oconee plants. A copy of that specification, titled "fish impingement on intake screens and entrainment of fish eggs and larvae," is attached for reference.

1. The first sentence imposes a requirement which seems inadequate. That is, it seems that a weekly visual inspection, made from the intake structure through several feet of water, is not adequate for the purpose of identifying the species of entrapped fish and estimating the total number and length of each species.
2. The second sentence of the specification seems the best method of obtaining reasonably accurate fish impingement information. It must specify a time interval, however, to be an enforceable requirement. Using this method, there is a question that remains of the number of fish which may be lost from the screen as it's removed from the water.
3. The third sentence of the specification which requires the underwater visual inspection seems a valid requirement, but the time interval seems too infrequent to gather any meaningful information.

We recommend the specifications be changed to require a determination of fish impingement based on counting and analyzing those fish on the screens as they are removed from the water. Include in the requirement a time frequency or schedule for making this determination.

4. In the second subparagraph of the specification, there is no time interval specified for the reporting level of 100 fish mortalities. At the present time, the licensee is making his count only every other week when he "pulls" the screens to meet an EPA requirement.

We recommend the requirement be reworded to specify the time interval which applies for the report level of 100 fish mortalities; for example, 100 per day or 100 per week.

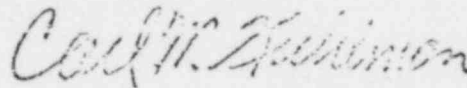
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Further, we recommend you: -

- a. review the "significance" of the report level of 100 fish mortalities. Since July 1974 the count has been in the range of 800 to 3500 every two weeks when the licensee has pulled the screens.
- b. delete the requirement for the 24-hour reports to the Regional Office of RO, but retain the 10-day written reports to Licensing and specify a cc be sent to the Regional Office. Our Regional Office does not initiate any prompt action as a result of these reports; therefore, these prompt reports from the licensees serve no useful purpose to Regulatory. The Regional Office has, as a matter of routine, been publishing a local news release on these occurrences since the number reported greatly exceeds the 100 value specified as the report level.

We request your early consideration of these recommendations. If you have any questions about this request, contact Leo Higginbotham (7413).



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and Materials Protection, RO

Enclosure:
As stated

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