

REP

JAN 19 1972

Chairman Schlesinger
Commissioner Ramey
Commissioner Johnson
Commissioner Larson
Commissioner Doub

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EPA REVIEW OF OCONEE DRAFT ENVIRONMENTAL STATEMENT

Reference is made to my memorandum of January 14 on the same subject to Commissioners Ramey and Doub which has been circulated to the Commission. The memorandum identified four major outstanding problems requiring resolution with EPA and which were to be discussed with CEQ & EPA on January 18, 1972. Gordon McDonald, CEQ, Deputy Administrator Fri, EPA and Commissioner Doub and respective staff members attended the meeting. The full list of attendees is attached.

As a result of discussions of each issue the following positions and agreements were reached:

1. Extent and Timeliness of EPA Comments
EPA recognized it should have identified additional data requirements on a more timely bases in accordance with previous agreements with AEC and CEQ. They plan to take steps to assure more timely comments for future cases. AEC agreed on the need for obtaining more details in certain areas in order to permit a more comprehensive impact analysis, but also reiterated concern over potential overburden of unnecessary detail.

It was agreed by EPA that requests for additional data related to site selection were inappropriate for cases such as Oconee. EPA offered to work with AEC on the matter of site selection for new cases (in the course of discussion EPA learned of AEC's proposed rule for early site hearings and they plan to review and comment on it).

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Follow-up [All parties agreed on the need to separate comments specific to the immediate needs of Oconee from those comments requiring consideration for future cases. EPA volunteered to outline for AEC their general areas of concern that should be remedied in future environmental statements.

2. "As Low As Practicable"

Both agencies recognized the need for establishing specific "as low as practicable" limits for regulating purposes and the philosophical view of promulgating less discharges than "as low as practicable". EPA agreed not to include comments addressed to the matter of alternatives and of enforced levels below established "as low as practicable" limits. Instead, they will address the philosophical aspect by advocating that applicants be encouraged to use good management practices to reduce discharges to the lowest level practicable whenever possible.

3. Accident Analyses

Although EPA maintained its previous position (need for quantification of probabilities and need for further treatment of the Class 9 accident); they expressed the intent to make it clear in the comments that EPA supports AEC's approach for establishing generic guidelines. EPA agreed to eliminate specific comments on Oconee that were contrary to this position and to maintain equivalent sensitivity in this area when commenting on subsequent statements. AEC agreed to expedite the full development and establishment of guidelines. EPA plans to send AEC a letter requesting the opportunity to participate with AEC in the final development of the guidelines.

A discussion of emergency planning in the environmental statement was considered appropriate by EPA. Since emergency planning considerations are treated in the reactor safety review AEC agreed to make reference to this in the statement.

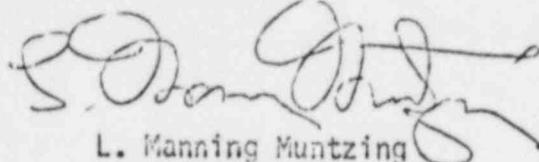
4. Transportation

This matter was not fully resolved. Although EPA agreed in principle with the need to treat the subject on a generic bases they urged early issuance of the report presently being prepared by AEC. In addition EPA continued to maintain the need to evaluate the most populated route to arrive at the worst environmental impact. They were not satisfied with the published material for justifying the AEC position that safety was not dependent on special routing. More detailed discussions are to be held between the respective staffs.

Follow up

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5. The meeting was considered to be informative and productive and it was agreed by all that the principles and restraints discussed should apply to all future cases.



L. Manning Muntzing
Director of Regulation

Enclosure:
List of Attendees

cc: General Manager (2)
General Counsel (2)
Secretary (2)

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MEETING AT CEO
TO DISCUSS GENERIC PROBLEMS
AND SPECIFIC COMMENTS ON OCONEE

JANUARY 18, 1972

ATTENDEES

Gordon McDonald, Member, CEO
William Dircks, Staff, CEO
Timothy B. Atkeson, General Counsel, CEO
Robert Fri, Deputy Administrator, EPA
David Dominick, Assistant Administrator, EPA
David Harward, EPA
William Holmberg, Assistant Director, OFA, EPA
Stan Greenfield, Assistant Administrator for
Research & Monitoring, EPA
Commissioner Doub
L. Manning Muntzing
Martin Domagala
Lester Rogers
Howard Shapar
A. Giambusso

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