



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF

3 JUL 1980

Dr. Robert Geckler
Program Manager
Division of Site Safety and
Environmental Analysis
Office of Nuclear Reactor Regulations
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Dr. Geckler:

On April 21, 1980, your agency sent us a copy of the Final Environmental Impact Statement (EIS) for the LaCrosse Boiling Water Reactor. This Final EIS was prepared to fulfill the requirements of the Nuclear Regulatory Commission (NRC) under the National Environmental Policy Act. Included in the Final EIS are responses to comments made on the Draft EIS dated October 12, 1976. These comments are included on pages A-7 through A-14 of the Final EIS. Our comments indicated concerns regarding excessive radioactive releases, the inadequacy of the dose assessment analysis and the design of the cooling water intake structure.

One of our major concerns was the release of radioactive Carbon 14. Table 3.6-3 gave a value of 9.5 Ci/yr as the amount of radioactive Carbon 14 emitted to the atmosphere. To verify this release rate, we used NRC's publication, "Calculations of Releases of Radioactive Materials in Gaseous and Liquid Effluents from Boiling Water Reactors", to calculate the emission from the LaCrosse Reactor. Results from using this manual showed there would be an emission of 0.7 Ci/yr, consequently we requested that the discrepancy be explained in the Final EIS. This concern was not addressed anywhere in the Final EIS, nor was any reason given for not responding. Since we thought our concern was valid, we decided to contact your office your office directly.

Mr. Valentine Malafeew of your staff explained the discrepancy between the release rate for Carbon 14 in Table 3.6-3 and our calculated rate. Table 5.6-3 is an estimate of the maximum radioactive releases from a power plant which was used in the calculation of radioactive doses. The radioactive doses to individuals are the values of most concern. Maximum dose estimates have been established by NRC and are provided in Column 1 of Table 5.5-4. Individual dose estimates from the LaCrosse Reactor were calculated, using 3.6-3, and are provided in Column 2 of Table 5.5-4. A comparison of the two columns shows that the LaCrosse Reactor meets the design criteria established by NRC.

Our comments on the Draft EIS also requested an estimate of the worldwide dose from the LaCrosse Reactor. Mr. Malafeew said he did not believe this estimate could be made since the dose from this plant, to an individual, would be so small that it would be difficult to calculate. Furthermore, it was Mr. Malafeew's estimate that the dose received by an individual would be less than that from natural sources.

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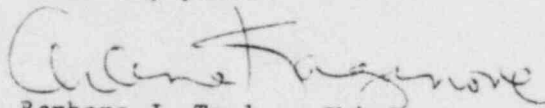
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We also expressed concerns regarding the adequacy of the cooling water intake structure. Cooling water intakes are required to be designed to reflect the best technology available to minimize adverse environmental impacts. This concern was discussed on page 11-4, paragraph 11.5.3. In their response, the NRC staff concluded that the intake design did not reflect best available technology; however, the fact that the Wisconsin Department of Natural Resources had granted a permit to operate the plant would imply that the design was adequate. Our Agency agrees with the NRC staff that the design does not reflect best technology. We shall encourage the Wisconsin Department of Natural Resources to reevaluate the intake design during permit reissuance and determine measures to be taken to improve the design.

Our concerns expressed on the draft EIS have been resolved with the additional information provided by Mr. Malafeew. We believe that the additional information should have been included in the Final EIS and, thus, be available to all participants in the EIS review process for the LaCrosse project.

We appreciate the opportunity to review this Final EIS and the assistance provided by Mr. Valentine Malafeew. If you or other members of your staff have any questions in regard to our comments, please contact Mr. William D. Franz at 312/886-6687.

Sincerely yours



Barbara J. Taylor, Chief
Environmental Impact Review Staff
Office of Environmental Review