

50-409



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Anthony S. Earl
Secretary

BOX 7921
MADISON, WISCONSIN 53707

June 6, 1980

IN REPLY REFER TO: 1650-2

Dr. Robert Geckler
Environmental Project Manager
Division of Site Safety & Env. Analysis
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Dr. Geckler:

Re: Final Environmental Statement Related to
Operation of La Crosse Boiling Water Reactor,
Dairyland Power Cooperative, Vernon County, WI

The Department has completed its review of the above document and submits the following comments:

SPECIFIC COMMENTS

Page 3-1, 3.3.2, Reactor and Fuel - Permission has been granted to Dairyland Power Cooperative to enlarge the storage capacity to 440 assemblies from the existing capacity of 134.

1. Will this provide adequate storage for the duration of the operating license period?
2. Will this additional storage capacity be used to store fuel assemblies from other nuclear facilities?

This paragraph should be written to indicate just what this increased storage means to the operating capacity of this plant.

Page 3-17, 3.7.1, Chemical Discharges - Department WPDES permit files indicate that ammonium hydroxide and not morpholine is used as a boiler feedwater additive for pH adjustment.

Page 5-2, 5.2.2, last paragraph, Groundwater - It is our understanding that the low volume wastewater from the La Crosse Boiling Water Reactor is discharged to a large ash pit constructed in 1974-1975 for the coal-fired Unit #3. If the Company is discharging such wastewaters to the Genoa #1 ash pit, they are doing so without a WPDES permit.

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Page 5-8, 5.4, Water Quality Standards - The temperature limits referenced on this page (based on NR 102, Wis. Adm. Code) are no longer imposed in the discharge permit until such time as we develop modifications to the code.

Page 11-4, 11.4.1, Impact of Landfill During Plant Construction - The Department objects to the concept that the taking of habitat is justified because it is a small part of the whole. Piece-meal loss of small parcels contributes to a greater degradation and loss of habitat than is stated.

The benefit that riprap is providing for increased benthic flora and fauna is questionable. This riprap is located adjacent to the water intake and discharge areas and is also subject to considerable barge traffic. Thus, the benefits derived from this riprap are questionable at best.

GENERAL COMMENTS

It would seem appropriate in an environmental statement related to operation of this facility to discuss the training of operations personnel. There is no indication of any specialized training or requirements of personnel that operate this reactor.

We thank you for the opportunity to comment on this Final Environmental Statement and hope that our concerns will be appropriately considered.

Sincerely,
Bureau of Environmental Impact



Howard S. Druckenmiller
Director

cc: Jim Lissack - Eau Claire
Paul Didier - WW/2