

UNITED STATES OF AMERICA  
ATOMIC ENERGY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of	)	
	)	
THE TOLEDO EDISON COMPANY	)	
and THE CLEVELAND ELECTRIC	)	Docket No. 50-346
ILLUMINATING COMPANY	)	
	)	
(Davis-Besse Nuclear Power	)	
Station)	)	

DAVIS-BESSE NUCLEAR POWER STATION  
ENVIRONMENTAL PUBLIC HEARING  
APPLICANTS' RESPONSE TO QUESTIONS AND  
COMMENTS IN LIMITED APPEARANCE STATEMENTS

A limited appearance statement was presented by Dr. Owen Davies representing the Ohio Audubon Council. Dr. Davies summarized his statement with two major concerns; (1) that an adequate ecological study had not been conducted and (2) that due and proper consideration had not been given to the force of winds and waves during recent storms and the sudden and unpredictable weather occurrences in the area of the station site. (Tr. p. 164)

In regard to ecological studies, Applicants feel that there have been fully adequate studies conducted to date as reported in Applicants' Environmental Report Supplement, the Commission's Final Environmental Statement and The Final Safety Analysis Report. In addition, Applicants are conducting a preoperational monitoring program in both the terrestrial and lake areas to establish baselines of existing conditions against which conditions present following station operation can be compared, to determine the extent, if any, of changes to the environment resulting from station operation.

In regards to consideration of the force of winds, waves and weather in the area of the station site, Applicants' testimony in regards to Issue 2 of this proceeding clearly shows that all extremes of weather conditions have been considered in the design of the station and that the station design is such that the structures are capable of withstanding the forces associated with these weather conditions and any forces of waves

which could be present during such storm conditions.

In addition to these two major concerns expressed by Dr. Davies, he has a number of specific comments in his limited appearance statement.

Dr. Davies stated that the bird census (Table 3-1) does not apply to Navarre Marsh since it is a summary of bird observations made at a nearby refuge over a series of years. (Tr. p. 156)

Response: Table 3-1 in Applicants' Environmental Report Supplement was not purported to represent observations made only on the station site. The text states that Table 3-1 is a reproduction of the U.S. Bureau of Sport Fisheries and Wildlife leaflet 249 and is a census of birds in the vicinity of the station site, principally in units of the Ottawa National Wildlife Refuge taken over a number of years of observations. While this census data does not apply to any particular portion of the Ottawa National Wildlife Refuge, it is likely that the birds reported in this census can be found with the same frequency on the Navarre unit of the Ottawa National Wildlife Refuge which is within the station site boundaries; in the same frequency as they can be found in any other specific area of the Ottawa Refuge, with the exception of birds such as herons, which have established rookeries on West Sister Island.

Dr. Davies stated that the water fowl count (p. 3-6) is unsatisfactory since there is no data presented from previous years to compare with it. (Tr. p. 156)

Response: The data presented in Table 3-2 is spot census data of water fowl on the Navarre Marsh during September and October of 1971. This data is obtained by the Ottawa National Wildlife Refuge manager and was presented here simply to show the extent of the water fowl during this particular time on the Navarre Marsh.

Dr. Davies stated that there is no indication that the Lake Erie studies of Dr. Ayers are continuing. (Tr. pp. 156-157)

Response: As indicated in the text on page 3-4 of the Environmental Report Supplement, this study has been concluded. Page 3-5 discusses the Federal Aid Project F-41-R, which is a continuing study and which commenced in 1969 and is not sponsored by Applicants. This F-41-R project includes an

extensive sampling and inventory of lake biota in the area of the station site. Appendix 2B of the Final Safety Analysis Report contains a summary of the lake biota obtained both from Dr. Ayers' work and the F-41-R project.

Applicants have initiated a preoperational environmental monitoring program for lake biota which augments and supplements the continuing F-41-R project. This program is being conducted under contract with The Ohio State University which is also conducting the F-41-R project.

Dr. Davies states that he is a bit concerned about use of data from the Toledo Express Airport for some of the studies relating to the effects of station operation. (Tr. pp. 157-159).

Response: On-site meteorological data has been obtained commencing in 1968. Data from this program for a two year period has been reduced and this data has been used to determine the effects of possible releases of gaseous radioactivity from the station.

The meteorological data from Toledo Express Airport was used by NUS Corporation to determine the potential environmental effects of operation of the cooling tower. The results of this study were discussed on page 7-17 through 7-19 of the Environmental Report Supplement and the complete study results are reported in Appendix 7F of the Environmental Report Supplement. Both the Environmental Report Supplement text and the study itself goes to great length to explain why Toledo Express Airport data was used and to show that there is proper correlation between the Toledo Express Airport data and the on-site data. In fact, the study report contained in Appendix 7F devotes 15 pages to the reason why the Toledo data was used and the correlation with on-site data.

Dr. Davies devotes considerable time to a discussion of the storms that occurred in November of 1972 and the spring of 1973. (Tr. pp. 159-164)

Response: In testimony concerning Issue 2 of this hearing, Applicants' testimony has shown that none of the storms during this period had any adverse effect on the station construction or structures.

This testimony also showed that the station is designed and constructed to withstand storms and water levels which are much more severe than any that have been experienced at the site and which are the maximum credible that could ever be expected to be experienced at the site.

A limited appearance statement was presented by Genevieve S. Cook representing the Coalition for Safe Electric Power, the Intervenor in this hearing. Miss Cook's statement was primarily related to the so-called class 9 accident and to the adequacy of emergency core cooling systems. Pursuant to the Atomic Energy Commission regulations, class 9 accidents need not be considered in this proceeding because of their extreme improbability. With respect to emergency core cooling systems, we would note that this is a subject of ongoing rule making proceeding in which environmental groups, utilities and reactor manufacturers are participating. This proceeding has produced more than 25,000 transcript pages. The adequacy of emergency core cooling systems, of course, is not the subject of this environmental hearing.

In the limited appearance statements of Russel M. Bimber and Seba H. Estill, the effectiveness of the emergency core cooling systems and the so-called class 9 accident also seemed to be the principle concern.

Alan Rhodes, in his limited appearance statement, expressed concern about extreme accidents.

Edward L. Solem, in his limited appearance statement, expressed concern about accidents involving the shipment of spent fuel and the design of shipping casks. The Staff responded to these concerns and Applicants have no additional responses concerning shipment of spent fuel.

DATED: August 8, 1973

August 8, 1973

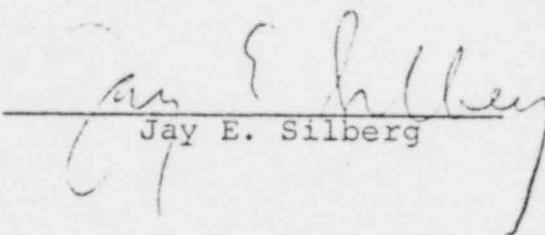
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CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Response to Questions and Comments in Limited Appearance Statements" were served according to the attached Service List this 8th day of August, 1973.

  
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Jay E. Silberg

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