



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

January 17, 1972

ENVIRON, FILE (EPA)

50-269

Lester Rogers, Director  
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EPA COMMENTS ON OCONEE

As you know, I have been maintaining continuing contact with Bill Holmberg, EPA, in regard to EPA's comments on the Oconee draft environmental statement. Mr. Holmberg tells me that since our evening meeting last week EPA staff has modified their comments to the extent that some of the issues we identified may have been resolved.

On the issue of "as low as practicable", EPA plans to recognize and accept the concepts of "as low as practicable". However, they still plan to point out that in certain cases (such as in Oconee), they will promulgate conditions below the "as low as practicable" limit if it can be done without plant redesign.

On the item of transportation, EPA plans to recognize this as a generic matter. However, they also plan to identify considerations which would enhance the impact analysis but which should not be factors in reaching conclusions on overall impact.

In regard to accident analyses, EPA's comments will recognize the present rule-making procedure and the appropriateness of treating the subject on a generic basis. In addition, EPA will make reference to and attach its letter of January 13, 1972, which provides comments on the proposed rule.

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