



United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240



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APR 16 1971

Dear Mr. Price:

On February 10, you requested our comments on a Draft Detailed Statement on Environmental Considerations prepared by your staff in connection with the application of Consumers Power Company to construct Midland Nuclear Power Plant, Units 1 and 2, Midland, Michigan (AEC Docket 50-329 and 50-330.) The Statement was furnished in accordance with Section 102 (2)(C) of the National Environmental Policy Act of 1969. This statement takes into consideration the applicants draft environmental statement submitted to us August 6, 1970 and comments received from various State and Federal Agencies on the review of that statement.

Our review of this draft statement indicated several areas where additional information is needed. We have described these below for your consideration.

Site Planning-- It is evident that Consumers Power Company has not yet developed a final site plan for this facility. The applicant states that the entire 1,190 acre site which includes an 880 acre cooling pond will be confined to the generation of power and process steam. Although the land was previously zoned for industrial and residential development, this should not preclude public access to those onsite areas where personal health and safety would not be endangered. We therefore view the applicant's contemplated information center as a desirable feature of the plant, and we suggest that the final environmental statement assess the recreation and esthetic potential of the 880 acre cooling pond.

Esthetics-- The statement inadequately treats the visual-esthetic effects of the facility and related structures such as transmission lines. Since there was no architectural treatment of the project in this report it was impossible to evaluate this aspect.

Graphic and narrative material is undoubtedly available which if included would aid in the review of the statement. Comments from other interested parties on visual esthetic effects should be attached to the report.

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Archeological Values-- The statement does not indicate that archeological values have been considered. It is recommended that this matter be discussed with the State Liaison for Historic Preservation and the results included in the statement. The State Liaison Officer could also advise whether there are any properties being considered for nomination on the National Register that would be affected by the project. The State Liaison Officer for Michigan is the Director, Department of Natural Resources, Stevens T. Mason Building, Lansing, Michigan 48926.

Geological and Hydrologic Safety-- Nuclear plants are as a rule located in isolated or semi-isolated places away from major population centers. It is reasonable to presume that this is done as a means of lessening public exposure should there be a major accidental release of radioactive contaminants. While it can be postulated that in the case of Midland, Class I structures are used for the reactor and radioactive waste containment buildings and that the utmost effort has been made to preclude a major accident, it cannot be said that such an accident is impossible. Locating this plant so near a town of approximately 30,000 persons would seem to be contrary to established practice. Therefore, the consequences of the worst possible accident needs to be more fully evaluated from the standpoint of its effect on both the people and their environment.

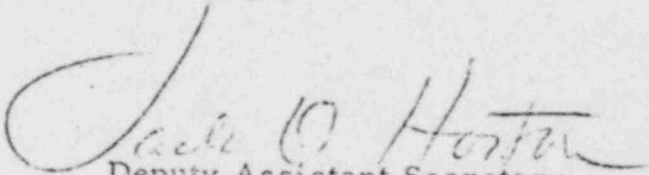
This draft environmental statement contains no geologic information with which to make an evaluation of the impact of the construction and operation of the plant on the environment.

Monitoring-- The draft environmental statement and the applicant's environmental report indicate that meteorological, ecological and radiological surveillance programs have been formulated. However, these studies will not begin until after the AEC issues a construction permit. It appears that some of the data obtained in these studies will influence the location and design of structures associated with nuclear power plant operation. Furthermore, ecological studies are necessary to document the present status of the environment and to estimate the effect of the construction on the environment, a certain amount of data should be available prior to issuance of the construction permit.

Alternatives to the Proposed Action--In covering alternatives there should be a discussion of the siting of this facility on the Tittabawassee River versus other locations particularly since there may be insufficient flow to meet the projected demand. There should also be a discussion of alternatives to supplying process steam. One of the alternatives to be considered should be the installation of air pollution control devices on the chemical plant. In discussing these alternatives sufficient evidence should be presented to substantiate that these actions have minimal environmental impact.

We appreciate the opportunity of commenting upon this statement and hope our suggestions will be helpful in preparing a complete Environmental Impact Statement.

Sincerely yours,


Deputy Assistant Secretary
for Programs

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