



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

SEP 8 1977



Mr. Victor Stello, Jr., Director
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Stello:

REGULATORY DOCKET FILE COPY

Thank you for your letter of August 12, 1977, concerning the Dresden Nuclear Power Plant and the review of the Station's 316(b) demonstration by the Illinois Department of Conservation. My staff plans to complete its review of the 316(b) demonstration very soon. Your comments, as well as those from the Department of Conservation, will be considered in our proposed determination in this matter.

We are concerned about the analysis included in your August 12, 1977, letter particularly insofar as it differs from the estimates utilized in the May 19, 1977, letter from Don K. Davis of the U.S. Nuclear Regulatory Commission (NRC) to R.L. Bolger of Commonwealth Edison Company. Has your staff calculated confidence intervals for the entrainment, impingement and the fish population estimate data? We also note that your staff considers minnows, suckers and herring as unimportant to the ecosystem. Such statements, we believe, raise serious questions about the NRC's environmental evaluation process for both operating and planned nuclear power plants. In the same vein, the recent evaluations of environmental data from operating nuclear facilities performed by several ERDA laboratories for NRC suggest that the present monitoring programs do not provide adequate data for assessing environmental impact. While the Dresden monitoring program was not evaluated, we strongly suspect that many of the criticisms noted in the other reviews apply to the Dresden program also. Many of these items will be dealt with in greater detail in our response to the company on its 316(b) demonstration and, we will not dwell upon them here.

In closing, I would like to note that our perception of the NRC reviews and requirements - EIS's, technical specifications, monitoring and technical specification modifications and evaluations - is that the processes are failing badly to fulfill their intended purposes. This, in our view, erodes the credibility of the nuclear industry and the regulatory agencies and lends credence to the growing criticism of these processes. We would like to work with your staff to remedy this situation as much as possible.

Sincerely yours,

George R. Alexander, Jr.
George R. Alexander, Jr.
Regional Administrator

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TO: Mr. Victor Stello, Jr. FROM: U. S. EPA
 Chicago, Illinois 60604
 George R. Alexander, Jr.
 DATE OF DOCUMENT: 09/08/77
 DATE RECEIVED: 09/12/77

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DESCRIPTION Ref. NRC's ltr. dtd. 08/12/77 concerning Dresden Plant and review of Stations 316(b) demonstration... Noting EPA's perception of NRC reviews and requirements - EIS's tech specs, monitoring and tech spec modifications and evaluations - are failing badly to fulfill intended purposes and would like to work with staff to remedy this situation as much as possible...

DO NOT REMOVE

ACKNOWLEDGED

PLANT NAME: DRESDEN UNITS 1, 2, & 3
 cjm 09/13/77

ENCLOSURE

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