

OAK RIDGE NATIONAL LABORATORY

OPERATED BY
UNION CARBIDE CORPORATION
NUCLEAR DIVISION



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OAK RIDGE, TENNESSEE 37830

September 8, 1980

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Mr. Calvin W. Moon
Licensing Project Manager
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Cal:

Environmental Contentions For Allens Creek Hearings

Attached is a summary list of contentions (Attachment A) for which the Laboratory has agreed to prepare testimony and to defend at the hearing. Please inspect this list for completeness and inform us as soon as possible if changes are deemed necessary. We plan to transmit to you an initial draft of testimony for each contention by November 3.

We also emphasize that NRC staff, namely Dick Froelich, should have lead responsibility for contentions dealing with analyses of alternative sites and transportation of the reactor pressure vessel (Nos. 3, 10 and 11 of Attachment A). The Task Group is prepared to provide input to the designated principal author as per your instructions.

Meanwhile, we are reviewing our files to determine if additional information is needed from the applicant or from others to prepare definitive testimony. So far we have nothing in our files on the Marrack-2(c) contention (No. 4 of Attachment A). Specifically, we need Marrack's responses to our interrogatories (see Attachment B), his disposition (Reference TR, pp 1280-1281), and all other correspondence among Marrack, the Commission and HL&P. In any event, we hope to have identified all remaining information requests in a couple of weeks.

To facilitate preparation of the subject testimony and to provide you and Steve Sohinki with an opportunity to meet the Task Group, we

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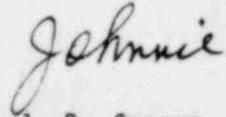
Mr. Calvin W. Moon

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strongly urge you to set up an early meeting with all participants involved. We look forward to your reply.

Sincerely,



J. B. Cannon
Project Manager

JBC:se

Attachments

cc: w/attachments
R. B. Braid
S. A. Carnes
R. B. Craig
J. W. Dick
R. M. Reed
T. H. Row
F. S. Sanders
R. C. Tepel
H. E. Zittel

Attachment A

Allens Creek Hearings -- Environmental Contentions and ORNL Witnesses

<u>Intervener</u>	<u>Summary of Contention</u>	<u>Witness</u>
1. TexPIRG2, McCorkle 2; Griffith 4	The smaller cooling lake size and changed location will render the lake useless as a viable fishery.	F. S. Sanders
2. TexPIRG 4	If a cooling lake is approved, it should be redesigned (increased in size) to be more of an environmental benefit.	F. S. Sanders
3. TexPIRG A-1	Waterway barge transportation of reactor components has not been considered, and will result in unacceptable environmental impacts.	NRC* (Froelich, Romano, and Bykoski) and R. M. Reed
4. Marrack 2(c)	FES and FES Supplement do not properly consider transmission line impacts to waterfowl.	R. M. Reed
5. TexPIRG 5; Cumings 6 (B)	Consideration of the combustion of solid waste as an alternative energy source is inadequate.	J. W. Dick
6. TexPIRG 7(D); Cumings 6(C)	Passive solar techniques have not been considered in assessing energy conservation as an alternative.	J. W. Dick
7. TexPIRG A-8	Natural gas is a viable alternative energy source, and has not been adequately considered.	J. W. Dick
8. TexPIRG A-12	Nationwide system interconnection will obviate the need for additional HL&P generating capacity.	J. W. Dick

Attachment A (Cont'd)

<u>Intervener</u>	<u>Summary of Contention</u>	<u>Witness</u>
9. TexPIRG (a, b,c)	Investment in conservation equipment, self-generation, and rate structure are energy conservation measures that have not been adequately considered as alternatives to Allens Creek	J. W. Dick
10. Hinderstein 5; Bishop 23 (c)	The possibility of a site on the Texas Coast using salt water should be explored	NRC* (Froelich) and ORNL (J. B. Cannon, S. A. Carnes, R. M. Reed, and F. S. Sanders)
11. TexPIRG 1; Bishop 23(a); Conn 2; Cummings 4; Daggett 2; Johnson 5-2 and 6-1; Lemmer 2	The South Texas site is an obviously superior alternative to the Allens Creek site.	NRC* (Froelich) and ORNL (J. B. Cannon, S. A. Carnes, R. M. Reed, and F. S. Sanders)

*Dick Froelich has primary (or lead) responsibility.

Attachment B

Bob Reed

INTERROGATORIES FOR MARRACK 2(c)

1. Provide a map which shows the route of the alternative transmission line -- "to follow the Brazos River to the south of the site, then east and then north to the O'Brien substation."
2. Describe land use along the alternative transmission line route.
3. Describe the types and amounts of floodplain forest that would be affected by the alternative transmission line route.
4. Describe those areas along the alternative transmission line route that are used by (a) waterfowl and (b) threatened or endangered species.
5. Provide a map which shows the proposed Allens Creek transmission line corridors and those areas along the corridors where migratory waterfowl will be affected by the transmission lines.
6. Describe those areas along the proposed transmission line corridors where impacts to migratory waterfowl are expected to occur.
7. Quantify the predicted impacts to migratory waterfowl at each of the described areas, (e.g., fatalities per year), and indicate the amount of mitigation that would be provided by the alternative transmission lines.
8. Provide copies of those documents relied on to predict the impacts to migratory waterfowl. Do these documents refer to the specific areas to be crossed by the proposed transmission lines? If they do not refer to these areas, describe how these documents can be used to predict impacts at these specific areas.
9. Provide a map which describes the continuous, diurnal migratory waterfowl flight paths between the three large wildlife refuges the Fish and Wildlife Service has acquired along the coast between Freeport and Matagorda, and the feeding areas on the arable lands to the north up towards Sealy. (Reference TR, 1280-1281).

Bob - I sent this list to Steve Schink (our lawyer) on 3/24/90. I added the last question, since his description of the flight paths doesn't seem to correlate with the transmission line he wants to relocate. Let me know if you'd like to modify or add to these questions. JWF