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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

JAN 19 1981

Dr. William E. Kreger  
Assistant Director for  
Radiation Protection (P-302)  
Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear *Bill* Kreger:

In response to your request, I had my staff review the Supplement to the Draft Environmental Statement (DES) for the Virgil C. Summer Nuclear Power Plant. Because this particular DES considers the possible impacts of the occurrence of a class 9 type accident, we were pleased to have this opportunity to comment specifically on this consideration. We have encouraged the inclusion of this class in environmental statements on light-water reactors and view this as a continuing practice. We believe that a discussion of the possible impacts resulting from core melt accidents can provide a more comprehensive evaluation of the overall environmental risk associated with an individual nuclear power plant. Although our detailed comments are being forwarded to our Region IV office for a coordinated EPA response to NRC, there are a couple of thoughts I want to pass on to you.

The original DES presented operational impacts without a discussion of probability of occurrence. In the supplement, the discussion of accident impacts in terms of risk biases the presentation by glossing over the magnitude of the consequences. It is our view that the discussion of probabilities of occurrence, magnitude of consequences, and risk considerations of accidents in environmental statements should be given separate attention.

The other point I want to express is the need to develop standard methodologies for incorporating costs of reactor building clean-up and decontamination and replacement power into the economic risk calculations. These factors are significant and important to the benefit-cost balance.

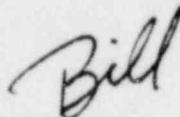
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Thank you for the opportunity to review this document. Do not hesitate to contact me if I can be of further assistance. I look forward to our continued close working relationship.

Sincerely yours;

A handwritten signature in cursive script that reads "Bill".

William A. Mills, Ph.D.  
Director

Criteria & Standards Division (ANR-460)  
Office of Radiation Programs

cc: C. Wakamo, Region IV