



Washington Public Power Supply System  
A JOINT OPERATING AGENCY

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January 19, 1981

Docket No. 50-395

U.S. Nuclear Regulatory Commission  
1717 H. Street N.W.  
Washington, D.C. 20555

Attention: Director, Division of Licensing

Gentlemen:

Subject: Comments on Draft Environmental Statement Supplement

Reference: Draft Environmental Statement Related to the  
Operation of Virgil C. Summer Nuclear Station  
Unit No. 1, NUREG-0534 Supplement, November 1980

Based on our experience with previous NRC Environmental Statements, we suspect that the reference supplement may be prototypical of the environmental analysis the Commission Staff will prepare in other operating license cases. We, therefore, have reviewed the subject report and find that, while it generally complies with the NRC interim policy statement (45 FR 40101), it can be improved in a few areas.

Subsection 6.1.1.3 seems excessively brief, given the body of literature and public interest in radiation exposure health effects. This general discussion should relate pathways and individual organ doses to health effects. The susceptibility of different age groups should also be discussed.

The second sentence of the fourth paragraph of Subsection 6.1.4.1 should be deleted. The judgment that the health effects of design basis accidents are "exceedingly small" contributes nothing and invites debate.

In Subsection 6.1.4.2, we can find no explanation for considering environmental parameters out to 500 miles. Such a large exposure area is not required by the NRC policy statement. The projection of population and land use statistics for this area to year 2000 is not a useful exercise when the health-related exposures would virtually all occur within a 50-mile radius (see Subsection 6.1.4.3). Such projections and the attendant assumptions only invite unproductive criticism.

Subsection 6.1.4.4 is weak in that the considerations employed to derive the economic costs in Figure 6.1.4.-6 are not explained. For instance, the reader doesn't know what uses of property or services are assumed to

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be foregone and for how long. (In this section, and in others, there is inadequate cross-referencing to other sections of the DES which provide the basis.) Also not considered are the probable costs associated with forced outages of other units of similar design operated by SCE&G or other licensees (ala TMI-1).

Radiological impacts via the groundwater pathway, discussed in Subsection 6.1.4.5, are referenced to the "Liquid Pathway Generic Study" (LPGS) results. The reader doesn't really know what water sources are made unusable or whether the individual doses in Columbia and Charleston, South Carolina, and other communities would exceed 40 CFR Part 141 standards. As presently written, the reader is told that the drinking water of upwards of 550,000 people "would be affected" without being given any basis for assessing the significance of the contamination. It is stated that the population doses for the liquid pathway from Summer are the same order of magnitude as for the LPGS, but it would be more effective to provide the calculated doses.

Reference to the latest environmental crisis--acid rain--at the top of Page 6-20 seems patronizing. On the same page, the economic risks associated with cleanup and decontamination are inappropriately compared with individual plant insurance coverage.

In summary, the DES supplement appears to fulfill the intent of the Commission's policy statement and provides a generally good statement of environmental impacts due to accidents. The length and detail of the discussion in general seems appropriate for the uncertainties and assumptions inherent in the subject matter.

Very truly yours,

  
G. D. Bouchey  
Nuclear Safety Director

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cc: J. R. Lewis, BPA