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November 19, 1982

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Ms. E. G. Adensam, Chief
Licensing Branch No. 4

Re: Catawba Nuclear Station
Docket Nos. 50-413, 50-414

Dear Mr. Denton:

In regard to Ms. Elinor G. Adensam's November 8, 1982 letter which transmitted comments received by the NRC on the Draft Environmental Statement for the Catawba Nuclear Station, please find attached Duke Power Company's response to those comments.

Very truly yours,

H.B. Tucker/RWO

Hal B. Tucker

RWO/php
Attachment

cc: Mr. P. K. Van Doorn
NRC Resident Inspector
Catawba Nuclear Station

Mr. Robert Guild, Esq.
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DUKE POWER COMPANY

RESPONSES TO

FEDERAL, STATE, AND LOCAL AGENCY

COMMENTS ON

DRAFT ENVIRONMENTAL STATEMENT

CATAWBA NUCLEAR STATION

DOCKET NOS. 50-413 and 50-414

NOVEMBER 19, 1982

S. C. Department of Archives and History, letter dated August 27, 1982 and the University of South Carolina, Institute of Archeology and Anthoropology, letter dated September 9, 1982.

Agency Comment:

State reasons for the recommendation that for archaeological site 37YK72 "no further investigation of the site was recommended" and add the condition that further investigation of the site (38YK72) is recommended if construction impacts to the site cannot be avoided.

Duke Response:

Duke Power Company agrees with the statements of Mr. Lee and Dr. Stephenson concerning any further impact on site 38YK72. If any additional construction is done on or near the location of site 38YK72, Duke Power Company will take the appropriate steps to thoroughly evaluate any impact to the archeological significance of this area.

United States Department of Interior, letter dated September 30, 1982

Historic and Archeologic Impacts

Agency Comment:

Additional information concerning the exact location of the Catawba - Ripp Line in relation to Kings Mountain National Military Park is needed to enable the DOI to determine the impacts of construction and operation of the proposed line on the park.

Duke Response:

Duke has been responsive to requests from NRC concerning the location of the Catawba-Ripp Line and, therefore, feels that sufficient information on the location of the line, to satisfy the concerns of the Department of the Interior is available. Duke agrees with the NRC statement (CNS-construction EIS page4-9), that of all routes considered for the Catawba-Ripp Line, the selected route exerts the least impact upon sensitive areas of the park.

Water Quality

Agency Comment:

"Thus it appears that operation of the proposed Catawba Nuclear Station will be in violation of State water quality standards and the Clean Water Act (P.L. 92-500) under which those standards were developed."

Duke Response:

The Nuclear Regulatory Commission (NRC) has recognized that the Environmental Protection Agency (EPA) is the federal agency with the duty to protect water quality under the Clean Water Act and that it has the requisite expertise to perform this function. The EPA has delegated permit issuing authority under

the National Pollutant Discharge Elimination System (NPDES) permitting program to the South Carolina Department of Health and Environmental Control (DHEC).

The NRC, recognizes the responsibilities of DHEC to protect water quality and aquatic biota as stated in the DES Section 5.14.2.

Post-Operational Monitoring

Agency Comment:

"Consequently, neither the applicant nor the U. S. Nuclear Regulatory Commission proposed post-operational monitoring programs of entrainment/impingement or thermal effects."

Duke Response:

Duke feels that the entrainment/impingement discussion in the DES, Section 5.5.2.1 adequately addresses the concerns and in light of all impingement rate and the DES projections on entrainment, the programs proposed by the Interior Department are not warranted. In the discussion on thermal discharge effects the suggestion that a program to monitor thermal effects following plant start up is not warranted. The Allen 316 (a) Demonstration and recent scientific research demonstrate that 90°F is not an abrupt threshold, as implied in the USDI letter. A 105 acre zone of Lake Wylie devoid of indigenous species has been disproven not only at Plant Allen [316(a)] but also at Marshall and, nationwide by UWAG's Thermal Discharge Reports which were submitted to EPA in June, 1978.

The Post-Operational Monitoring proposed in the USDI letter is not justified based on actual operating experience effects on aquatic biota in the Duke system and results of studies conducted on operating power plants in the Southeast in general.

Jesse L. Riley letter dated October 22, 1982

Duke Response:

Recent Commission rulings (47 FR 12940, March 26, 1982) obviate the requirement for inclusion of "need for power" and "alternative energy sources" in operating license proceedings. It is Duke's position that the summary of benefits and costs for operation of Catawba Nuclear station meets all regulatory requirements.

Duke will resolve recent problems with Westinghouse steam generators prior to commercial operation of Catawba Nuclear Station.

Department of Health and Human Services letter dated October 12, 1982

Agency Comment:

No mention is made in Section 5.9.4(3) of an Emergency Operation Facility (EOF) being planned for location on-site to coordinate activities needed to mitigate the consequences of serious accidents.

Duke Response:

An Emergency Operations Facility (entitled the Crisis Management Center or CMC) is located onsite in the Catawba Nuclear Station administration building. Duke has made provisions for an alternate EOF at the corporate headquarters in Charlotte, NC. The EOF is addressed in detail in the Emergency Response Plan.

Agency Comment:

It is noted that the NRC is considering proposals to require real time monitors that can provide useful, timely information to implement the off site protection actions following an accident. In view of some of the monitoring problems identified during the TMI-2 accident, we suggest that the system, which is being studied by a consultant, include reevaluation of the airborne radioiodine sampling and analysis program, and, if appropriate, include the finding in the proposed system. We are particularly concerned about the problem of monitoring radio-halogens (specifically radioiodine) in the presence of radionoble gases.

Duke Response:

Duke's offsite radiological monitoring system to be used in response to emergency conditions is described in Section 1 of the Catawba Emergency Plan, Rev. 1, December, 1981. This system meets the standards set out in NUREG-0654 and Regulatory Guide 1.97. In the event of emergency conditions TLDs used in conjunction with field monitoring teams equipped with instrumentation, including real time monitors, provide the necessary dose rate, integrated dose, and radioiodine concentrations for dose assessment.

Communications with the NRC on the subject of offsite radiological monitoring systems to measure offsite dose rates during emergency conditions are as follows:

Catawba Emergency Plan, Rev. 1, Decmeber, 1981
Duke Power Company Crisis Management Plan
CNS FSAR Sections 11.3.3, 11.5, 12.5.2, Volume 13, Section 810