



Ohio Department of Natural Resources

OFFICE OF OUTDOOR RECREATION SERVICES
Fountain Square • Columbus, Ohio 43224 • (614) 265-6395

May 3, 1982



Mr. John J. Stefano
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Draft Environmental Statement - Operation Licensing Stage
Perry Nuclear Power Plant, Units 1 and 2, Ohio
(Docket Numbers 50-440 and 50-441)

Dear Mr. Stefano:

The Ohio Department of Natural Resources has completed a review of the above-referenced document. The attached comments were generated by an interdisciplinary review process conducted and coordinated by the Office of Outdoor Recreation Services. Should any question arise, please contact me or John Rupert of the Environmental Review Section of this office.

We appreciate the opportunity to provide these comments.

Sincerely,

Roger D. Hubbell, Chief
Office of Outdoor Recreation Services

RDH/dlw
Attachment

cc: Ohio State Clearinghouse
(SAI #36-472-0003)

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0002 B.I. Add: John Stefano



Ohio Department of Natural Resources

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May 3, 1982

COMMENTS ON DRAFT ENVIRONMENTAL STATEMENT
OPERATING LICENSE STAGE PERRY NUCLEAR POWER PLANT, UNITS 1 AND 2
(Cleveland Electric Illuminating Company, U.S. Nuclear Regulatory Commission,
March, 1982)

The Perry Nuclear Power Plant (PNPP) Draft Environmental Statement - Operating License Stage (DES-OL) addresses issues involved with the startup and operation of Units 1 and 2 of the plant. Issues raised earlier, evaluated in the Final Environmental Statement - Construction Permit Stage (FES-CP) are not readdressed in this document.

Many of the concerns of the Department of Natural Resources have been addressed both in FES-CP and through the certification procedure for the plant by the Ohio Power Siting Commission (OPSC, now the Ohio Power Siting Board). The Department, represented on the Commission and its technical staff, provided input into the assessment of the application, which resulted in the "Secretary's Report of Investigation and Recommended Findings" for the Commission. This report provided a basis, along with other documents, for the certification of the plant.

The DES-OL adequately addresses most of the impacts associated with the startup and operation of the PNPP. However, certain aspects of concern to this Department, need further comment.

The Department is in complete agreement with the planned use of the closed-cycle cooling system instead of the once-through system as originally proposed for the PNPP. This system will reduce water consumption, thermal pollution and fish impingement and entrainment. This approach utilizes best available technology and is the preferred choice for such a plant.

The locations of the intake and discharge structures are also greatly important in reducing impacts. Sections 4.2.4.1 and 4.2.4.2 state that the intake and discharge structures will be approximately 777m and 503m offshore, respectively, in 6.4m and 5.8m of water. Section 4.3.3 describes the placement of underwater instrument towers in the vicinity of the intake

and discharge structures at 1070m and 760m offshore. It is unclear as to whether these towers were not necessarily "in the vicinity" of the structures, or whether the placement of the structures were changed during design, or whether some calculation or typographic error is present. This should be clarified.

Section 4.2.6 describes the cleaning of the reactor flow passages, piping and equipment with a number of phosphate based compounds. It is stated that these cleaning products will be "neutralized" with lime and that the supernate will be discharged to Lake Erie. This solution will contain about 50% more phosphate than the ambient lake water. Although this proposal seems reasonable, no mention is made in the document regarding the fate of the lime-phosphate sludge. It is our understanding that the sludge will be placed upland in an on-site sludge lagoon. The document needs to clarify the final deposition of this material. This sludge should not ultimately end up in the lake.

Also in Section 4.2.6, the DES-OL states that 8300kg/day of 93% sulfuric acid will be added to the closed-cycle cooling system to prevent formation of scale on the condenser tubes. This appears to be a large amount of acid. It is not stated if all of this amount will be added to the secondary system, or just a portion of it. The FES-OL should identify the necessity for such quantities of the sulfuric acid as well as to which sub-systems it will be added. Furthermore, the FES-OL should better quantify the pH of the cooling water that will be discharged to Lake Erie. Table 4.2 only specifies the limits of the NPDES permit, expected to be issued for the discharge effluent, and not what is actually expected. This should be stated.

In summary, we feel that the operation of the PNPP poses no significant avoidable impacts to resources of concern to this Department. We concur with the Summary and Conclusions as presented in the DES-OP.