



United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

ER 82/809

JUL 8 1982

William H. Regan, Jr., Chief
Siting Analysis Branch
Division of Engineering
Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Regan:

Thank you for your letter of May 4, 1982, which transmitted copies of the draft environmental impact statement related to the construction of Skagit/Hanford Nuclear Project, Unit 1 and 2, Benton County, Washington. Our comments are presented according to the format of the statement or by subject.

Related Federal Project Activities

The potential activity of the Bureau of Reclamation in contracting for stored water from Franklin D. Roosevelt Lake should be described here. A summary of this Federal action could be taken from the material already included in the DES on pages 3-49 through 3-51. This activity should also be included in Appendix J.

Existing Conditions, Groundwater Quality

It is stated that waste disposal operations have already contaminated the glaciofluvial aquifer but it is not made clear where the source(s) of contamination are located. A clarification of the contamination source(s) is recommended.

Environmental Impacts, Site and Vicinity

The draft statement indicates that the installation and operation of a triple makeup water intake system and a single blowdown effluent nozzle could have intermediate and long-term effects on downstream sediment transport and alteration of substrate textures. Downstream transport of fine sediments could adversely impact chinook salmon spawning gravels below the project location since the Columbia River serves as a migration corridor to anadromous chinook, coho, and sockeye salmon and for anadromous steelhead trout. The Hanford Reach provides the last remaining mainstem spawning areas for fall chinook salmon. These stocks have declined to less than 5 percent of their historical numbers and are considered by the Fish and Wildlife Service to be this Nation's most important resource problem.

We believe the applicant should relocate the intake/discharge site to a point about 2,800 feet downstream of the proposed location, as suggested on page 4-65 of the draft statement. This would result in a substantial reduction in the size and duration of in-water excavation activities. The impact to aquatic resources such as anadromous fish would thus be proportionally reduced.

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Chemical Discharges

The 4 to 6 percent increase in mercury concentrations at the edge of the mixing zone appears to be insignificant. However, fish have the ability to concentrate this metal in their tissues from water with very low ambient concentrations. Since fish will be attracted to the warm discharge water, especially during winter months, they will be continuously exposed to the elevated mercury concentrations. The final statement should assess this impact.

The DEIS states that "serious biological consequences" could result from the proposed levels of total residual chlorine in blowdown discharge during summer months. Due to the toxicity of sodium hypochlorite, we recommend that this chemical not be used as an antifouling agent, regardless of the discharge concentrations. We would prefer that no antifouling chemicals be used in order to preserve water quality in the Columbia River.

Transmission Corridors and Offsite Areas

We appreciate the applicant's proposal to avoid cutting any trees at the old Hanford townsite. Perch sites for bald eagles and other raptors are limited along the Columbia River, therefore it is very important to avoid cutting trees when possible. If construction activities require the removal of any trees or riparian vegetation, they should be replaced with cuttings or saplings of the species removed.

Impacts to Terrestrial Ecology

There is no discussion of revegetation of impacted habitat areas in the mitigation section. The temporary construction and laydown areas, and sand borrow areas comprise the majority of the impacted area of 1200 acres. While this may be a relatively minor habitat loss, it would seem that revegetation merits further discussion in terms of its added benefit in controlling soil erosion which is identified as a concern in the same mitigation section. Sec. 6.2.3 touches upon this same concern but still does not fully address the issue. It seems premature to consider this an "irreversible and/or irretrievable" loss.

We note that chemical stabilizing agents will be used, if necessary, to control wind erosion. To avoid environmental contamination, we would prefer that straw packing and rye grass plantings be used where necessary to control erosion.

We hope these comments will be helpful to you in the preparation of a final statement.

Sincerely,


Bruce Blanchard, Director
Environmental Project Review