



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
324 EAST ELEVENTH STREET
KANSAS CITY, MISSOURI - 64106

50-482
August 2, 1982

Mr. B.J. Youngblood
Chief, Licensing Branch No. 1
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Youngblood:

Wolf Creek Generating Station, Unit No. 1,
Coffey County, Kansas

We have reviewed the Final Environmental Statement (EIS) for the proposed operation of the planned nuclear facility identified above. We are submitting comments on the final statement which both restate several of our earlier concerns, and address information in the final statement.

Operational Environmental Monitoring

In our comments on this section, we identified several inconsistencies between the Draft EIS and the Environmental Report. These included the numbers, types, and locations of samples and sampling frequencies for several exposure pathways. None of these inconsistencies were acknowledged in the Final EIS. We continue to believe that, at this late stage of project development, the procedures to monitor the facility's operation should be established and the plans consistent.

Decommissioning

The response to our comments on this section indicated NRC will develop a more explicit policy on decommissioning nuclear facilities as part of the generic rulemaking process. However, this response does not address our concerns with decommissioning this facility. The response does not indicate how the estimated \$63 million decommissioning costs would be financed to ensure the funds are available when needed. Furthermore, there was no response to the concern as to when the licensee's financial responsibility would end in relation to decommissioning the facility.

Economic Risks

Our comments on the estimated costs of emergency planning were not addressed. We are particularly concerned with the expense of maintaining emergency plans on State and local governments, and believe the costs would be higher than the \$3600 annualized cost identified in the Final EIS (Table 5.10).

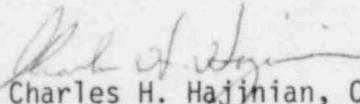
Non-Radiation Issues

The Final EIS includes references to the NPDES permit for the Wolf Creek Generating Station. As of July 23, 1982, no application for a NPDES permit for the operational wastewater discharges, or plans and specifications for wastewater treatment facilities have been received by the Kansas Department of Health and Environment (KDHE). Until the permit is drafted by the KDHE, speculation concerning its requirements is premature.

Appendix B is identified as having information on the NPDES permit; however, it does not contain permit information.

Thank you for the opportunity to review and comment on the Final EIS. If you have questions regarding the concerns we expressed in this letter, please contact our office. The staff members most familiar with this project are William Brinck and Robert Fenemore. They may be reached at FTS 758-6525 and 758-5593, respectively.

Sincerely yours,



Charles H. Hajinian, Chief
Environmental Review Branch