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State of Louisiana

Department of Environmental Quality

Edwin W. Edwards
Governor

JAN 27 1994

William A. Kucharski
Secretary

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U.S. Nuclear Regulatory Commission
Office of Nuclear Material Safety
and Safeguards
Mail Stop 4-E-4
Washington, DC 20555

Attention: Ms. Merri Horn

Dear Ms. Horn:

Subject: Comments to Draft Environmental Impact Statement for the Construction and Operation of Claiborne Enrichment Center, Homer, Louisiana

The Office of Water Resources has reviewed the DEIS for the proposed Claiborne Enrichment Center. We present the following comments:

1) (Page 4-4) Figure 4.2 - Location of the site hold-up basin and effluent discharge outfalls at CEC (LES, 1993b).

COMMENTS:
We recommend that the sewage treatment system discharge at Outfall 001 be routed to the unnamed stream coming from the southwest side of Bluegill Pond. It is our judgement that the nutrient loading of this discharge as proposed will cause aquatic growth in Bluegill Pond and would result in dissolved oxygen problems during late summer months. It has been our experience with similar waters around the state that sanitary sewage discharges into these type waters have caused such problems.

2) (Page 3-41, last paragraph) Section 3.3.2 - Groundwater Resources. ...Sulfate concentrations have ranged from 5.3 to 83 mg/l. The 83 mg/l concentration exceeds the current State of Louisiana numerical water quality criteria of 15 mg/l for Lake Claiborne Region. Additional samples of the shallow Sparta Aquifer were taken at the request of the LDEQ (LES, 1992e). The results of these samplings showed that sulfates measurements were consistently above the 15 mg/l level in the States's standards (Table 3.15).

COMMENTS:
It has been determined by the OWR that sulfate discharge concentrations will be limited to 250 mg/l. The decision is based on LDEQ's Environmental Regulatory Code 33 IX.1113.C2. The regulation states in part...For waterbodies not specifically listed in the numerical criteria tables, increases over background levels of sulfates may be permitted. Such increases will be permitted at the discretion of the Office of Water Resources on a case-by-case basis and shall not cause in-stream concentrations to exceed 250 mg/l.

3) (Page 2-4, second bullet paragraph) Section 2.2.1 - Site Development. Erosion and slumping will be minimized by developing and following a soil and erosion control plan. This plan will be submitted to and approved by the Louisiana Department of Environmental Quality prior to initiation of construction. This plan will involve the use of internal and external diversions, incremental clearing, temporary and permanent grassing, mulching

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and matting, silt fences, sediment traps, and check dams.

COMMENTS:
Storm water discharges resulting from the construction of the proposed facility should comply with the provisions set forth in the EPA NPDES General Permits For Storm Water Discharges From Construction Sites. (Federal Register, Construction Permit Language, Part II, Wednesday September 9, 1992).

The Office of Water Resources requests that the stated comments be considered by the NRC in the review of the license application by Louisiana Energy Services L.P. to construct and operate a uranium enrichment facility to be located in Claiborne Parish, Louisiana. Should there be any questions concerning the comments, please contact Percy V. Harris of the Water Pollution Control Division at (504) 765-0551.

Sincerely,

J. Dale Givens, Assistant Secretary
Office of Water Resources

JDG:PVH

cc: Ronald Wascom
Office of Air Quality and
Radiation Protection

Cheryl LeJeune
Water Pollution Control Division