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Office of the Director
Clinch River Breeder Reactor Program Office
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Comments on Draft Supplement to Final Environmental
Statement for the Clinch River Breeder Reactor Plant
(NUREG-0139, Supp. No. 1)

Gentlemen:

By letter of June 10, 1982, to the Commission, I commented concerning the need for supplementation of the 1977 FES, and requested, for purposes of comment, a copy of any Draft Supplement to the FES issued. On June 29, 1982, Mr. Check, Director of the CRBR Program Office, forwarded to me a letter stating that a copy of the report would be sent to me "when it becomes available".

Despite the notice of availability appearing in the July 30, 1982, Federal Register, and a number of follow-up telephone calls placed by me in an effort to secure a copy of the Draft Supplement to the FES, I did not receive a copy until the afternoon of September 8, 1982, only 2 working days prior to expiration of the comment period.

I renew the request for additional time to comment, which I made by letter of September 2 to the CRBR Program Office.

However, in an effort to comment within the period established by the July 30, 1982 Federal Register notice, I wish to make the following preliminary observations regarding the Supplement to the CRBR FES.

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Impact of Emergency Planning Measures

Section 11.7.16, discusses in response to earlier comments, a highly generalized treatment of emergency planning, the recent changes in the Commission's emergency planning regulations. The discussion of those measures, even as supplemented by Appendix J, fails to include any discussion of the "socioeconomic impacts . . . associated with emergency measures during or following an accident". Such a discussion in environmental statements is required by the Commission's Statement of Interim Policy re: Nuclear Power Plant Accident Considerations Under NEPA of 1969, 45 Fed. Reg. 40101. See particularly p. 40103.

The omission of some treatment of the socioeconomic impacts associated with emergency measures is in the face of the explicit recognition in the FES Supplement of the types of protective actions which may be warranted, including evacuation and interdiction of food stuffs and land. See FES Supplement, p. J-15. Such measures will necessarily entail socioeconomic cost. If the reference in Table J-5 to the "cost of protective actions and decontamination" purports to be a response to the Interim Policy Statement requirement of discussion of socioeconomic impacts, it is woefully inadequate. A single dollar figure purporting to be an "average" value of "cost" of protective actions and decontamination due to "selected" CRBRP accidents is not the discussion which the interim policy statement contemplated. The socioeconomic impact of interdicted land and food for uncertain periods of time has not been included in the "cost" of taking protective action.

Thus, while "the results shown for CRBRP include the benefits of these protective action", (P. J-15) the FES has not factored in the total cost of the emergency measures.

Among, but certainly not an all-inclusive list of, the socioeconomic impacts of emergency measures which must be analyzed are the following:

- (1) loss of property value due to interdiction, including depreciation in market value, and lack of maintenance-caused depreciation if interdiction extends for a long period;
- (2) loss of revenues from income-producing property which has been interdicted;
- (3) loss of revenues resulting from evacuation;
- (4) social impact of disruption of local economy and social fabric caused by evacuation;

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(5) relocation costs;

(6) impact of interdiction or evacuation of nearby facilities with implications for national energy and security, (e.g., the Oak Ridge Gaseous Diffusion Plant, the ORNL R & D facilities, the DOE Y-12 area).¹

Radiological Impact on Biota

My review of the Supplement to the FES discloses no discussion of the consequences of potential radiological exposure to biota caused by accidents as required by the Statement of Interim Policy. See 45 Fed. Reg. 40103. The only discussion in the FES of radiological impact on biota appears to be that found in the FES, § 5.7.1, and supplement, P. 5-10, and is limited to exposures resulting from "routine" operation. Thus, the Statement of Interim Policy has not been complied with in this regard.

Probabilistic Treatment of Accidents

The Supplement (P. J-18) notes that a PRA will be performed for the CRBRP, reviewed by the Staff, and discussed in the SER. The Statement of Interim Policy notes that

The environmental consequences of releases whose probability of occurrence has been estimated shall also be discussed in probabilistic terms.

The Staff should therefore committ to issuance of another supplement to the FES upon review of the PRA, for purposes of including in the FES a fuller discussion of the full range of consequences of accidents analyzed in the PRA, together with their associated probabilities.

In the interim, however, I see no reason why estimated accident consequence probability distribution figures cannot be generated by the CRBR as they have been for LWRs and disclosed as they are now routinely done in Environmental Statements for purposes of licensing LWRs. See, e.g., NUREG-0654, Supp. No. 2, Supplement to Draft Environmental Statement - Susquehanna Steam Electric Station, Units One and Two, pp. 6-29 to 6-33. However, such figures should be generated for all accident consequences, including early injuries, leukemias,

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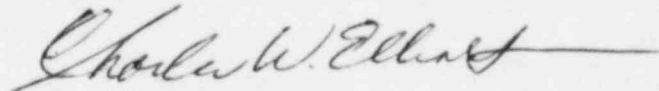
interdicted area, decontamination cost, interdicted crop cost, interdicted population, etc. This is a serious omission in the FES.²

Uncertainties

While the Supplement generally addresses the issue of "uncertainty" with respect to the environmental consequences of CRBR accidents (pp. J 18 - J 19) it does so in a meaningless way. The range of uncertainty of consequences would far better be expressed by generation of CCDF figures of merit, in order to disclose the actual quantifiable range of consequences and their associated probabilities, and with uncertainty bands. Where "actual" figures are disclosed (e.g. Table J-5) only "average" values are used. This does not properly disclose the uncertainties of the figures used. In addition, appropriate discussion of uncertainties in specific areas (e.g. health effects models) was absent.

The opportunity afforded to me to express my views was extremely limited, because of the failure of the Commission to timely provide a copy of the draft Supplement. However, I appreciate the opportunity, albeit limited, and I look forward to receiving a hopefully much improved final supplement to the FES.

Very truly yours,



CHARLES W. ELLIOTT

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FOOTNOTES

¹The Supplement at p. 11-24 merely notes that because information is not "readily available", the Staff has "not evaluated the impacts of severe accidents on activities at the DOE-controlled facilities." The lack of "readily available" information does not relieve the obligation to evaluate and disclose socioeconomic impacts. All the DOE facilities mentioned are within the 10 mile plume exposure EPZ, for which emergency plans must be established, which usually include evacuation as a protective measure.

²I understand that a CRAC-type computer run was performed for the CRBR site. Obviously, under the Statement of Interim Policy,

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a disclosure of the consequence-output is required, and I fail to understand why it has been omitted. While some of this information may have appeared in the site-suitability report, its omission in the FES, the only document circulated for NEPA purposes, constitutes a failure to comply with NEPA.