



BUCKET NUMBER
PROPOSED RULE

51
(56FR47016)

BUCKETED

Charles F. Gauvin
Executive Director

Suite 250
800 Pollin Lane
Vienna, VA 22180

FACE OF BUREAU
BUCKETING & SERVICE
BRANCH

March 16, 1992

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Mr. John W. Craig, Director
License Renewal Project Directorate
Division of Advanced Reactors and Special Projects
Nuclear Regulatory Commission
Washington, DC 20555

Re: Rule Change to Utilize Generic Environmental Impact Report
(GEIS)

Dear Mr. Craig:

Trout Unlimited is an international coldwater fisheries conservation organization with over 70,000 members in the United States. Its mission is to conserve, protect, and enhance coldwater fishery resources throughout our nation.

It is our understanding that your agency is presently studying and reviewing the feasibility of the use of a generic approach to the present requirement of an Environment Impact Statement (EIS) for the relicensing of facilities being considered for license extensions. Trout Unlimited is unequivocally opposed to adopting such a rule change for a number of reasons.

EISs are a mandate of the National Environmental Policy Act (NEPA) which requires that all federal agencies must prepare a detailed report regarding the environmental impact of every recommendation or report on proposal; for legislation and other major federal actions which significantly affects the quality of the human environment. The report's coverage should include the following:

- 1) the environmental impact of the proposed project;
- 2) any adverse impacts that cannot be avoided should the proposal be implemented;
- 3) alternatives to the proposed action;
- 4) the relationship between local short term uses of man's environment and the maintenance and enhancement of long term productivity; and
- 5) any irreversible or irretrievable commitments of resources that would be involved in the proposed action should it be implemented.

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America's Leading Coldwater Fisheries Conservation Organization
Washington, D.C. Headquarters: 501 Church Street, Northeast • Vienna, Virginia 22180 • 703-281-1100

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This analysis gives governmental decision-makers a complete picture of the potential impact of the federal action while supplying viable alternatives, if any. Furthermore, the process incorporates public input to assure that the final decision accurately reflects public comment on the sufficiency of the analysis. A generic approach for relicensing would for the most part circumvent this entire process.

Many environmental impacts by their very nature are local. Each plant siting has its own topographic conditions, microclimates, geology, water sources, and discharges that must be assessed. Some of these studies may have been conducted in the past for the original licensing, but the data gathered and data that still may be absent must be assessed incorporating present technological standards to warrant a clean bill of environmental health. Many of our streams in the Northeast are undergoing federally-sponsored restoration of the Atlantic salmon. This has occurred well after some facilities commenced operation. Some facilities will now come up for relicensing until 10 to 15 years from now, when the restoration program will be in full operation but potentially adversely affected by a thermal plume from the discharge of a nuclear facility. Certainly this type of impact should be assessed as it conflicts with another ongoing federal program. Other examples of concerns that would not be addressed if a generic approach would be adopted include:

- 1) long term effect of the operation of a facility on a river's ecosystem;
- 2) short and long term affects of operation (thermal and chemical compositions of discharges, etc.) on Atlantic salmon eggs, fry, parr and smolt and native and stocked trout populations and their food chains;
- 3) effect of entrainment and impingement on fish species in and around intake and outflow structures; and
- 4) effect of water discharges and withdrawals on migratory movements of Atlantic salmon adults and smolts.

It is our understanding that the generic approach to the EIS process will save the nuclear industry and the NRC approximately \$50 to \$75 million dollars in studies, personnel, and paperwork. We appreciate this initiative to cut such costs, but if you were to pose the proposition in a converse fashion, we believe that an overwhelming majority of the American public, if given a choice, would be willing to spend 25 to 30 cents per person to have a complete EIS undertaken for each facility.

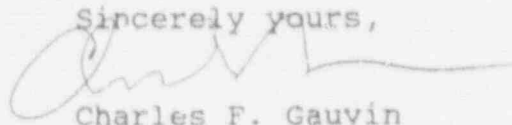
It is our position that the GEIS approach should not be implemented, and that the environmental impacts for each facility being considered for relicensing should be assessed on a site by site basis. In addition, alternatives to the relicensing of each

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facility should be explored, taking into consideration the relative importance of the facility to the regional energy delivery system and alternative sources including energy conservation and load management.

We appreciate the opportunity to comment on this matter.

Sincerely yours,

A handwritten signature in dark ink, appearing to read 'Charles F. Gauvin', with a stylized, flowing script.

Charles F. Gauvin