

United States Department of the Interior

OFFICE OF THE SECRETARY WASHINGTON, D.C. 20240

ER 84/884

AUG 15 1984

A. Schwencer, Chief Licensing Branch No. 2 Division of Licensing U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Dear Mr. Schwencer:

Thank you for your letter of June 29, 1984, transmitting copies of the draft environmental statement related to the operation of Hope Creek Generating Station, Salem County, New Jersey. We have the following comments.

We recommend ground-water monitoring during operation should be addressed more thoroughly. For example, the statement should indicate which aquifers are monitored at the wells listed on page 5-104, Table 5.11. It is unclear whether key chemical constituents in the potable ground-water supply will be monitored periodically. The analysis of possible releases of radionuclides to ground water demonstrates careful consideration of lateral migration of contaminants on pages 4-45 through 5-48. However, the confining layers that separate the major aquifers of the area are leaky, that is, they have appreciable permeability (Environmental Report p. 2.4-10, 2.4-15, 2.4-16, 2.4-17); thus the analysis should also address vertical or downward migration of radionuclides from a core-melt accident and should consider mitigation. We note that abrupt large rises in chloride and total dissolved solids concentrations occurred in 1980 and early 1981 in the water from PWS, an upper Raritan well about 1,200 feet from Hope Creek well HCl (Environmental Report p. 2.4-22 and table 2.4-12). The concentrations dropped just as abruptly later in 1981. This suggests the possibility of vertical or downward migration as head differentials developed, rather than up-dip migration of salines. This event should be considered in the context of our concerns.

We find the statement adequately addresses fish and wildlife concerns.

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

Sincerely,

Ruce Blanchard, Director

Environmental Project Review

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