



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II  
26 FEDERAL PLAZA  
NEW YORK, NEW YORK 10278

50/354

14 SEP 1984

Class: L0-2

Director, Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

ATTN: Mr. A. Schwencer

Dear Mr. Schwencer:

We have completed our review of the draft environmental impact statement (EIS) on the proposed operation of the Hope Creek Generating Station in Salem County, New Jersey. The draft EIS evaluates the operational impacts of a nuclear-fired 1,067 megawatt power plant and proposes mitigation measures, where possible, for unavoidable adverse impacts. Based on our review, we have the following comments to offer for your consideration.

Radiology

The draft EIS does not address the specifications of spent fuel pools and the methods of stacking that will be employed. Since there is no high-level radioactive waste repository presently in existence, these considerations are important and should be evaluated in as much detail as possible in the final EIS.

The radioactive dose assessment presented in the draft EIS does not reflect the cumulative impacts of the liquid and gaseous effluents from the Hope Creek unit and the neighboring Salem nuclear units 1 and 2. Although the plant will be operated in accordance with Appendix I to 10 CFR 50, we believe that the final EIS should additionally assess the cumulative dose consequences of all three facilities.

Water Quality

The draft EIS indicates that a supplemental water storage reservoir will be required to compensate for consumptive water use from the Delaware River when freshwater flows at Trenton, New Jersey are less than 85 m<sup>3</sup>/second in order to prevent migration of saline water into the Philadelphia water intake area. Therefore, the operating permit for the Hope Creek facility should not be issued until the Delaware River Basin Commission approves the application which has been pending since December 30, 1977, for the supplemental water storage reservoir.

The draft EIS does not explain how the conclusion was reached that the planned distance between cooling water intake and discharge points will be sufficient to prevent fish reimpingement and potential negative thermal impacts. The rationale for this conclusion should be given in the final EIS.

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A detailed map showing the intake and discharge points relative to the plant location, as well as the prevailing current directions in the channel should be provided in the final EIS. A figure depicting the configuration of the travelling screens should also be included.

#### Air Quality

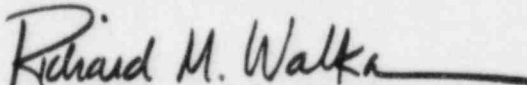
It appears that the plans for the facility have not changed since the last air quality review by this agency in 1981. Therefore, the Prevention of Significant Deterioration (PSD) regulations do not apply to this source of air emissions.

Therefore, in accordance with EPA policy, we have rated this draft EIS as LO-2, indicating that we tentatively lack objections (LO) to the operation of the Hope Creek generating station, but that we require additional information (2) in the final EIS on certain radiological and water quality issues before we can fully assess the environmental impacts of this project.

If you have any questions relating to the above comments, you may contact Mr. Edward Als, the environmental coordinator for this project, at (FTS) 264-1375.

Thank you very much for the opportunity to comment.

Sincerely yours,

  
Richard M. Walka, Chief  
Environmental Impacts Branch