

# MEMORANDUM

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE  
OFFICE OF THE SECRETARY

TO : Daniel R. Muller  
Assistant Director for  
Environmental Projects  
Directorate of Licensing  
U.S. Atomic Energy Commission

DATE: AUG 22 1973

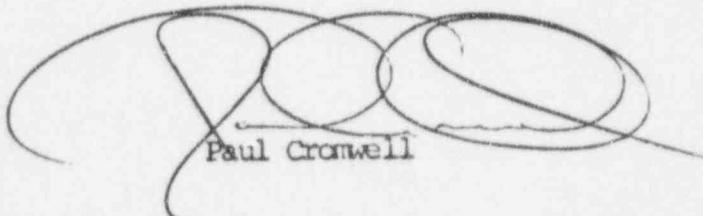
50-219

FROM : Acting Chief  
Office of Environmental Affairs

SUBJECT: Draft Environmental Impact Statement on the Oyster Creek Nuclear  
Generating Station

We have reviewed the draft Environmental Impact Statement on the Oyster Creek Nuclear Generating Station with interest. We have several comments which should be given consideration in the development of the final Environmental Statement:

1. A thorough analysis of the effects of the action on the local community would include the effects of an increase in population upon the demand for human services. What effect will 100 plant employees and their families have on education, transportation, housing and health facilities, etc. in the local area?
2. The deterioration of the estuarine function of Oyster Creek and the South Branch Forked River seems to be a major environmental effect for which no safeguard is provided. It would be helpful if the analysis of possible alternatives to the proposed action specifically addressed this effect.
3. Comments on the radiological effects of station operation are attached.

  
Paul Cronwell

Attachment

# MEMORANDUM

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE  
PUBLIC HEALTH SERVICE  
FOOD AND DRUG ADMINISTRATION

TO : Mr. Paul Cromwell  
Acting Director  
Office of Environmental Affairs, DHEW

DATE: AUG 9 1973

FROM : Assistant Director for Special Projects  
Bureau of Radiological Health

SUBJECT: Comments on the Draft Environmental Statement for Oyster Creek Nuclear  
Generating Station, Ocean County, New Jersey

The above documents were transmitted on July 19, 1973, from Dr. K. E. Taylor, Office of Environmental Quality, to the Bureau for review. A member of the Bureau's technical staff reviewed the AEC's Draft Environmental Statement. The statements made in these reports were assumed to be correct representations of the matter.

Based on the statements and representations presented within this document, it appears that operation of the subject facility can continue without undue radiological impact on the environment. The subject draft leaves something to be desired in that very little data from the 3-4 years operating experience are given in the subject statement.

## I. General Comments

1. I should think that complete data would have been recorded during plant operation since 1969, i.e. tritium releases as well as the other radionuclides. As the plant has already been operating for 3-4 years, recorded radioactivity data for fluid nuclide releases, new fuel received, spent fuel shipped and other radioactive disposals are needed in order to make comparison with the original estimates for making projections of the proposed power increase.
2. The statement below (item 2) indicates that the applicant has not applied available technology in releasing the gaseous radio-effluent. Nor does the subject statement indicate to what degree the applicant plans to meet the "as low as practicable" guidance relative to the existing or increased power levels. Efforts toward correcting this discrepancy should be carefully considered before granting permission for an increase in power level.

## II. Specific Comments

1. (Sec. 3.5.1.5) Liquid radwaste evaluation: Estimates of 5 Ci/y less tritium and 20 Ci/y for tritium are given. Table 3.3 presents recorded values of actual releases during operation. The 5 Ci/y has been exceeded from 1970 through 1972 and no actual release value for tritium is given. The text states that "no tritium release estimate was made." No explanation is given as to the constraints of recording actual release values for tritium or making estimates of these releases.
2. (Sec. 3.5.2.3) Gaseous waste evaluation: The last paragraph states: "Since available technology has not been applied to reduce the radioactivity level of the air ejector, the gaseous radwaste system does not meet our 'as low as practicable' guidelines." Also the sentence immediately following is not clear.
3. (Sec. 3.5.3.1) Solid radwaste evaluation: Subject report concludes "that the solid radwaste handling system is adequate and acceptable."
4. (Sec. 5.4.3) Radiological impact on man: The annual doses presented in Tables 5.3 and 5.4 were determined from calculated values given in Tables 3.5 and 3.6. Since data based on operating experience are given in Tables 3.3 and 3.7, such operational data should also have been presented in order to compare calculated and actual recorded values. Factors of 2-5 can be noted between calculated and recorded values for liquid and gaseous releases. The degree to which the man rem doses would be affected by using the actual recorded values is not given.
5. (Sec. 5.7) Transportation of radioactive materials: Apparently none of the 3-4 years operating experience is reflected in this section. Are fuel assemblies still being supplied by Exxon Corp. in Richland, Washington? Are the dose values, numbers and classifications of persons given in Table 5.8 still applicable? The summary and recommendations of the Report of the Advisory Committee on the Biological Effects of Ionizing Radiations, November 1972 do not support the recommended limit of 500 mrem/y for members of the general public. Where is the fuel reprocessing plant located? After 3-4 years of operation, some of these items have been determined.
6. (Sec. 6.2.4) Environmental radiation: Page 6-6, line 1, the following statement is made: "Data from this program indicate that no radiological environmental problems have resulted from releases of radionuclides from the Oyster Creek plant." What is the definition for a "radiological environmental problem?" Have complete and adequate data been recorded which would indicate the existence of a "radiological environmental problem"?

7. (Sec. 6.3.2) Environmental radiation, paragraph 3: What was the cause of the 10 mrem dose for the second calendar quarter of 1970? Apparently it was not caused by radioactivity from the plant since later in paragraph 8 it is given that "No radioactivity attributable to the Oyster Creek Station has been detected in well water, surface water from Oyster Creek, the bay or Forked River, or in air, soil, vegetation, fruits, or vegetables."
8. (Sec. 7.1) Plant accidents: Have any events occurred during operation since 1969 which can be classified per table 7.1?

  
E. C. Anderson

cc:  
Dr. Taylor (CS-30)