

FEB 19 1975

Note to: D. L. Capton
Senior Reactor Inspector

OYSTER CREEK TECH SPEC CHANGE REQUESTS

For information, I talked to Donald A. Ross on February 19, 1975, with respect to a prior inspection. As an aside, Mr. Ross, expressed concern regarding a large number of change requests currently being processed by DL. I gathered that Ross did not feel he was receiving a timely response to his requests, and he was reflecting this concern to us. There was no request for IE:I input regarding the processing of paper.

Edward G. Greenman
Reactor Inspector

B/889



United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240



In reply refer to:
PEP ER 73/972

FEB 14 1975

Dear Mr. Regan:

Thank you for your letter of December 20, 1974, transmitting copies of the Atomic Energy Commission's final environmental impact statement dated December 1974, related to operation of Oyster Creek Nuclear Generating Station, Ocean County, New Jersey.

We have reviewed the final statement and find that some of our concerns which we surfaced in our letter of November 9, 1973, on the draft statement have either not been considered at all or are subjects of inadequate response. These concerns are presented according to subject.

The Site

We find no response to the Department's comment appearing on page A-11 of the final statement: "We suggest that the AEC encourage the applicant to consider formally dedicating the land to total public recreation use in coordination with appropriate State agencies. Further, consistent with the necessary safety regulations, we suggest that the applicant be encouraged by AEC to consider developing the transmission right-of-way for recreation, particularly on public lands such as the Double Trouble State Park."

Likewise, we find no response to the comment found on page A-12 of the final statement which questioned basing the information on vegetation originally covering the site primarily on a search of the literature and which suggested use of aerial photographs, if available, to obtain better information.

Radioactive Waste Systems

We note that the following paragraph of our earlier comments found on page A-12 of the final statement has been divided in mid-sentence and that through inadvertence only the first part was responded to:



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"The solid radioactive wastes that result from operations of Unit 1 are discussed on pages 3-28 to 3-31. It is estimated that about 900 drums of spent resins and filter sludges and 600 drums of dry wastes, totalling approximately 2700 curies of activity after 180 days of decay, will be shipped offsite annually. However, the draft statement does not specify the kinds of radionuclides, their physical states, or their concentrations in the wastes, nor has the location planned for offsite burial been identified. The number of trips to the licensed burial site should also be identified in the final statement as part of the total ongoing radioactive waste program at the site." (underline added).

We find no response to the section of the paragraph which has been underscored.

The particular concern addressed here is related to the subsequent concern expressed in our earlier letter and found in comment 9 on page 11-23 of the final statement. We wish to reiterate that the type of response given to comment 9, one which makes reference to generalize studies and future environmental statements is inadequate if not addressed to the particular burial site and the particular wastes involved.

Any of these concerns relating to the Oyster Creek Station not previously addressed should be addressed in the final statement.

Plant Accidents

Similarly, with regard to comment 20 found on page 11-28 of the final statement, we find any reference to a discussion of the AEC's Reactor Safety Study an inadequate consideration of site specific safety concerns. We have serious reservations as to the reliability of the Reactor Safety Study - "An Assessment of Accident Risks in U. S. Commercial Nuclear Power Plants," as expressed in our comment letter of December 10, 1974, to the Atomic Energy Commission. Until the many questions raised by this Department and others regarding the validity of that study have been answered, we do not consider the results of the study to be adequate treatment of the potentially serious problem of plant accidents.

Soils

We find the response to the Department's concerns regarding excessive erosion and sedimentation as expressed in Comment 1 on page 11-18 of the statement to be inadequate. These problems experienced by the operation of the discharge canal, as admitted by AEC's staff, are said to be under remedial action through an ongoing program of bank stabilization. The environmental statement itself, however, does not provide adequate description of what these measures are.

In addition, the continuously recurring problem of disposal of the bed's dredging also needs to be solved and, while it is admitted by the staff that dredging is not a satisfactory long-term solution, no specific alternatives are provided. Only the statement that "measures will be required to avoid" the problem is given. Previous comments by this Department requested further information on the physical properties of the rocks and soils underlying the site. The only response to this request is a reference to the Safety Evaluation Report scheduled for publication in late 1974. Similarly, a request was made for information on the hydrogeologic properties of the waste disposal site. Again, the only response is a reference to future environmental statements for the reprocessing and disposal facilities. Once again we wish to emphasize that a final environmental impact statement should contain sufficient specific information to allow an independent evaluation of environmental impacts attending the operation of the plant. To be told only that information will be forthcoming raises questions as to the adequacy of the environmental statement format presently in use.

Effects on Aquatic Ecosystems

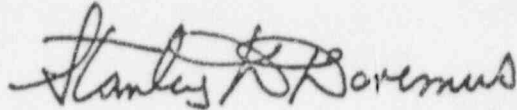
The Summary Section (p.i.) of the statement indicates that the problem of periodic fish kills, caused by winter shut-downs, was classified as not significant on the "overall fishery." This is misleading and ambiguous, since "significant" is arbitrary and a comparison is not drawn. Stated losses between 100 and 1,000,000 fish appear substantial on a local basis. Furthermore, we agree with the discussion on page 5-39 which indicates that the applicant's present plans to reduce or mitigate these losses are inadequate.

Minor Comments

The response to comment 7 on page 11-22 of the statement indicates that Table 2.6 has been revised to include Spartina alterniflora, Spartina patens, and Distichlis spicata. Such a revision does not appear in the Table as it appears on page 2-23 of the final statement.

We hope these comments will be helpful to you in further consideration of this project.

Sincerely yours,



Deputy Assistant Secretary of the Interior

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