Duquesne Light

Nuclear Construction Division
Robinson Plaza, Building 2, Suite 210
Pittsburgh, PA 15205

2NRC-5-089

(412) 787-5141
(412) 923-1960
Telecopy (412) 787-2629

June 10, 1985

United States Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Mr. George W. Knighton, Chief
Licensing Branch 3
Office of Nuclear Reactor Regulation

SUBJECT: Beaver Valley Power Station - Unit No. 2
Docket No. 50-412
Comments on BVPS-2 DES

REFERENCE: Letter from G. W. Knighton to J. J. Carey dated April 11, 1985

Gentlemen:

Please find enclosed additional information that may be helpful in responding to the comments on the Draft Environmental Statement received by the NRC from the various Federal, State, and Local government agencies.

If you have any questions, please contact T. J. Zoglmann at (412) 787-5141.

DUQUESNE LIGHT COMPANY

By E. J. Woolever/for
J. J. Carey
Vice President

TJZ/wjs
Enclosure

cc: Ms. M. Ley (w/e)
Mr. B. K. Singh, Project Manager (w/e)
Mr. G. Walton, NRC Resident Inspector (w/e)

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DOI-1 - THERMAL DISCHARGES

The closed cycle cooling system of BVPS-2 requires some small increase in the temperature of the discharge water over ambient river conditions. The average monthly temperature differences for Units 1 and 2 combined range from 1.3°C in August to 15.9°C in January. However, the combined discharges do not exceed State Water Quality Standards for temperature outside of a small mixing zone immediately adjacent to the discharge structures. The NPDES permit for BVPS previously contained a requirement for a 33 acre mixing zone. This requirement was deleted when the permit was renewed by the state of Pennsylvania on November 26, 1984.

The alternatives considered to reduce the temperature in the heated discharge were discussed in the FES-CP. Alternatives need not be discussed at the FES-OL state (10CFR51.21).

DOI-2 - SKIPJACK HERRING

Section 4.3.5.2 of the Draft Environmental Statement (DES) and Table 2.2-17 of the ER-OLS indicates that skipjack herring were collected at the site in the 1970-1972 sampling period. The anlaysis of impacts of operation of BVPS-2 on aquatic resources as presented in the ER-OLS considered the potential of impact to all fish species with likely or probable occurrence at BVPS included all species collected at the site (including skipjack herring) as well as other indigenous species not collected in the BVPS sampling program (see ER-OLS Table 2.2-18).

DOI-3 - GROUNDWATER

The two on-site wells are located approximately 1400 feet east of the reactor containment. In a phone conversation with Ms. M. Ley, the following information was provided:

° Well #1 is 89'6" deep
° Well #2 is 92'6" deep

The drawdown for the wells is as follows:

° #1: 6'10-1/2" at 210 GPM for 48 hours; static level, 64' down
° #2: 11' at 115 GPM for 48 hours; static level, 65'5" down

It should be noted that this drawdown was performed under test conditions; actual pumpage would be less since these wells only supply water to BVPS support buildings via the water tower located near the Training Building.

The on-site wells are routinely monitored for chemical and biological contaminants. Station procedures do not require routine radiological monitoring. In the unlikely event of a radiological spill, the long travel time associated with groundwater movement would allow ample time to effect remedial measures to isolate the contamination near the source. Such action would be undertaken immediately.

EPA-1 - WATER ISSUES

The effluent limits imposed on the discharges from BVPS 1-2 are consistent with the standards for new and existing electric power plants, i.e., BAT, promulgated on November 19, 1982. The NPDES permit for BVPS 1-2, effective November 26, 1984, was reviewed by EPA Region III under §402 of the Clean Water Act (CWA) before it was issued. The authority in 40CFR §123.(c)(4) allows the Regional Administrator (RA) to object whenever he believes the state misapplied the CWA regulations or guidelines under the CWA. Similarly, §123.75(c)(6) allows the RA to object whenever the proposed permit "in his judgment" contains case-by-case limitations that fail to carry out the CWA or EPA regulations.

During the permit application review process, the PA DER evaluated the impact of the facilities discharges on the designated use of the receiving waters and the water quality criteria based upon the designated uses. The basis for the determination was data submitted in the permit application, Form 2c. Subsequent to this evaluation, the PA DER determined no water quality based limits were appropriate.

The reason for the increases in concentrations of criteria pollutants is primarily the result of evaporative losses in the cooling tower. Any appearance of adverse impact on water quality as discussed on pages 5-3 and 5-9 of the DES is magnified by the use of a "worst-case" estimate of cooling tower blowdown concentrations (indicated in ER-OLS Table 5.3-4). This is the result of the use of a maximum concentration factor for BVPS-2 of 2.4 (i.e., cooling tower cycles of concentration) combined with maximum ambient river concentrations. Normally the concentration factor will range from a minimum of 1.5 to a maximum of 2.4 with an average of 1.8. In addition, the mixing zone requirements outlined on the ER-OLS Table 5.3-4a and discussed on page 5-3 of the DES are based on the 7-day, once-in-ten-year low flow in the Ohio River.

It should be noted that the majority of criteria pollutants are merely passed through the facility and that the net increase due to operation of BVPS-2 is considered insignificant.

EPA-2 - AIR ISSUES

BVPS-2 has or will obtain operating permits for the Auxiliary Boilers and Diesel Generators as required by the Pennsylvania Bureau of Air Quality Control. The emission estimates for the above equipment are discussed in ER-OL Section 3.7 and listed in ER-OL Table 3.7-1.

EPA-3 - RADIATION ISSUES

No comment.

EPA-4 and EPA-5 - RADIATION ISSUES

BVPS-2 adopted Summary Table S-3 of 10CFR51, Section 51.20, in ER-OLS Section 5.9. Further evaluation of uranium fuel cycle impacts is the NRC's responsibility.

EPA-6 - RECOMMISSIONING

Dose estimates for decommissioning were not addressed by DLC in ER-OLS Section 5.8. It is NRC responsibility to provide more detailed information.

JFD-1 - RADIATION EXPOSURE

BVPS-2 is required to show that it meets the requirements of 10CFR50. The dose conversion factors for the various pathways are developed by the NRC and the relationship to health impact is evaluated by them.

JFD-2 - RADIATION INDUCED BIRTH DEFECTS

BVPS-2 adopted Summary Table S-3 of 10CFR51, Section 51.20, in ER-OLS Section 5.9. Further evaluation of uranium fuel cycle impacts is NRC responsibility.