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Docket No. 50-498, 499, SOUTH TEXAS NUCLEAR PROJECT (STNP)

Subject: COMMENT ON THE DRAFT ENVIRONMENTAL STATEMENT (DES)

ITEM 1

The DES-CP was issued on March 1975, 11 years ago. Many of the findings in the DES-CP (NUREG-1171) refer to this document by indicating there has been little change since that survey. Since very few members of the public ever obtained the earlier document, and 11 years would be long time in which many persons might relocate into the South Texas region, the DES-CP should have included substantial reprinting of the DES-CP in order to inform the public of the environmental impacts. Therefore, the DES-OL is inadequate because it does not inform the public of environmental impacts sufficiently for this reason. Moreover, in the past the office of NRR has issued such OL environmental statements with reduced sized copies of the entire DES-CP when the gap between the two statements was less.

ITEM 2

The DES-OL is insufficient because it did not include a single alternative to the proposed action: the use of Texas lignite. The construction of "mine mouth" plants has been undertaken by several utilities in Texas using this native energy source. Completion of the STNP is still considerable time and money away. The use of lignite is arguably cheaper and of less environmental impact at this date. Hence, a special circumstance under 10CFR 2,758 exists and the DES-OL should have included such information.

ITEM 3

Item 4.2.4.1 describes the Intake System and mentions fish collected on the intake screens will be washed and returned. A description of how fish are to be washed would have been appropriate since it is an uncommon procedure to mitigate the effects of screen intake systems in reactor cooling.

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COMMENT ON THE DES-OL, SOUTH TEXAS NUCLEAR PROJECTITEM 4

Section 4.3.1.2 describes the expected groundwater impacts, particularly the depth of earth materials to the groundwater table. My comment is that there should be some indication if the site was surveyed for holes left from unsuccessful oil drilling in the Palachios, Matagorda County region. Seepage from the cooling lake to the groundwater table would be enhanced by old oil drilling holes, and the DES-OL should indicate something with regard to the known presence or absences of such drill holes.

ITEM 5

Lack of studies after 1982 in emergent vegetation (p. 4-9) for the Little Robbins Slough/Marsh Complex because of "... curtailed by lack of access (the Marsh is privately owned)." is disturbing.

The DES should include information on what is involved in doing these studies and what effort was made to get access to this area. It is not sensible for a member of the public to believe without more information that a sufficient effort was made to obtain this information and this is an insufficiency of the DES-OL.

Respectfully submitted,

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