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J. Wilson
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

64FR 28843
May 27, 1999
RECEIVED
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RULES & DIR. BRANCH
US NRC

August 16, 1999

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Chief
Rules Review and Directives Branch
Division of Administrative Services
Mailstop T 6 D 59
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

**RE: EPA Review and Comments on
Draft Supplemental Generic Environmental Impact Statement (DSEIS)
License Renewal of Nuclear Plants
Oconee Nuclear Station (ONS) Units 1, 2, and 3 (NUREG 1437)
Oconee County, South Carolina**

Dear Sir/Madam:

Pursuant to Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the subject Draft Supplemental Generic Environmental Impact Statement (DSEIS). The document provides information to educate the public regarding general and project-specific environmental impacts and analysis procedures. We appreciate your consistency with the public review and disclosure aspects of the NEPA process. The above-referenced supplemental document is site-specific to the Oconee Nuclear Station; this document is tiered from Generic EIS for License Renewal of Nuclear Plants.

The DSEIS was prepared in response to an application submitted to the NRC by Duke Energy Corporation, the current licensee, to renew the operating licenses for Oconee Nuclear Station Units 1, 2, and 3 for an additional 20 years. Operating Licenses for Units 1 and 2 will expire in 2013, and for Unit 3 in 2014.

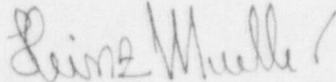
The proposed action is the renewal of the operating license for the referenced facility. This will provide an option that allows for power generation capability beyond the term of the current nuclear power plant operating license, to meet future system generating needs.

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Based on our review, we rate the DSEIS "EC-2", that is, we have environmental concerns about the project, and more information is needed to fully assess the impacts. In particular, the issues of public participation and offsite radiological impacts warrant further discussion in the Final EIS. Our detailed comments are attached.

Thank you for the opportunity to comment on this project. If you have any questions or require technical assistance you may contact Ramona McConney of my staff at (404)562-9615.

Sincerely,

A handwritten signature in cursive script, appearing to read "Heinz Mueller", followed by a short horizontal line.

Heinz J. Mueller, Chief
Office of Environmental Assessment

Attachment

**Comments on
Draft Supplemental Generic Environmental Impact Statement (DSEIS)
License Renewal of Nuclear Plants
Oconee Nuclear Station (ONS) Units 1, 2, and 3**

- ▶ **Terminology** - The title "Generic" for this document is misleading, since the document is site-specific to the Oconee Nuclear Station relicensing application.
- ▶ **Public participation** - We note the Availability Notice for related documents available to the public. However, there is no mention of information meetings or public meetings to be held within the affected communities. Have such meetings been scheduled?
- ▶ **Alternatives** - EPA appreciates that all reasonable energy resource alternatives were evaluated, in addition to the relicensing and no-action alternatives.
- ▶ **Offsite Radiological Impacts** - Section 6.1, page 6-3: discussion of the radiological impacts of the uranium fuel cycle on human populations needs clarification regarding collective effects over time. The statement is made that science cannot rule out the possibility that there will be no cancer fatalities from "tiny" doses. The paragraph previously states that tiny doses have some statistical adverse health effects. NRC should clarify and state what collective impact it believes these doses may have on human populations. Also, please define "tiny".