Docket NO. 50-395

Mr. O. S. Bradham
Vice President, Nuclear Operations
South Carolina Electric & Gas Company
Virgil C. Summer Nuclear Station
P. O. Box 88
Jenkinsville, South Carolina 29065

Dear Mr. Bradham:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION ON THE PROPOSAL TO EXTEND THE

OPERATING LICENSE OF THE V. C. SUMMER NUCLEAR STATION TO 40 YEARS

(TAC 59402)

The staff has reviewed your June 15, 1989 submittal of additional information to support your proposal to extend the operating license of the V. C. Summer Nuclear Station to 40 years. As a result of this review the staff finds that it needs some additional information. The additional information request is included as Enclosure 1 to this letter.

The FES seems unclear with respect to whether a 30 or 40 year operating life was assumed. In Section 4.2 of the FES, the lost productivity of forest land, as a result of taking the land out of production, is based upon an operating life of 40 years. Yet, when the impacts on the uranium fuel cycle and the commitment of resources in this area are considered, the operating life of the plant was assumed to be 30 years. In preparing information for this request, you should assume a 30 year operating life was used in the FES, unless otherwise stated, and assess the extension of the operating license accordingly.

The reporting and/or recordkeeping requirements of this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P. L. 96-511.

Sincerely,

EAdensam/for

John J. Hayes, Jr., Project Manager Project Directorate II-1 Division of Reactor Projects Office of Nuclear Reactor Regulation

DISTRIBUTION Docket File Local PDR S. Varga E. Adensam J. Hayes E. Jordan ACRS (10) Plant File	14-E-4 14-B-20 14-B-20 MNBB-3302	NRC PDR PDII-1 Reading G. Lainas P. Anderson OGC B. Grimes	14-H-3 14-B-20 15-B-18 9-A-2
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Chairman, Fairfield County Council P. O. Box 293 Winnsboro, South Carolina 29180

Mr. Heyward G. Shealy, Chief Bureau of Radiological Health South Carolina Department of Health and Environmental Control 2600 Bull Street Columbia, South Carolina 29201

South Carolina Electric & Gas Company Mr. A. R. Koon, Jr., Manager Nuclear Licensing Virgil C. Summer Nuclear Station P. O. Box 88 Jenkinsville, South Carolina 29065 COMMENTS ON SCE&G SUBMITTAL ON 40 YEAR OPERATING LICENSE FOR THE V. C. SUMMER NUCLEAR STATION, UNIT NO. 1 (SUMMER STATION)

I. ENVIRONMENTAL IMPACTS

A. LAND USE

The licensee indicated that they were not aware of any material changes that would alter the original conclusion of the FES with respect to impacts on land use. Did the licensee make a determination whether any changes did or did not take place?

B. HYDROLOGICAL IMPACTS OF OPERATION

1. SURFACE WATER

- a. The FES provided an assessment of the evaporative losses from the Monticello Reservoir as a result of the operation of the Summer Station. In the licensee's June 15, 1989 submittal, they referenced the information contained in the FES. Has the licensee confirmed that the evaporative losses associated with the operation of the Summer Station are enveloped by the analysis presented in their Environmental Report (ER)? Since the initial analysis was performed have the meteorological conditions varied so that the current analysis is no longer appropriate?
- b. The FES addressed the impact of the Monticello Reservoir on groundwater and on wells. The licensee has addressed the impact on groundwater of the extension and has addressed the impact. as a result of the operation of the Summer Station. in terms of the area around the Summer Station but has not addressed the impact on area wells. It is unclear from the licensee's submittal whether the term "around the Summer Station" is the area incorporating the Summer Nuclear Station structures or all area owned by SCE&G, or whether it also includes adjacent property including that not owned by SCE&G. The licensee should address the impact of operation and the license extension on the groundwater of adjacent properties, including those not owned by SCE&G, as well as the impact upon adjacent properties wells.

2. INDUSTRIAL CHEMICAL AND SANITARY WASTES

The licensee's submittal indicated pH problems associated with the treatment ponds during summer months. The licensee also indicated that they had received permission from the South Carolina Department of Health and Environmental Control (SCDHEC) for an algae control program. The licensee should address the impact the extension of the license will have with respect to the algae problem.

C. IMPACTS ON BIOTA

1. TERRESTRIAL

During the operating years, the FES discussed the impact of the transmission lines on the terrestrial biota. The licensee's June 15, 1989 submittal did not address the impact since operation of the Summer Station nor the probable impact as a result of the extension of the operating license. Both should be addressed.

D. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

The licensee has stated that the FES has already considered a 40 year operating period and commitment of resources has been determined and found acceptable. The staff has reviewed the FES and can only find reference to 40 years in Section 4.2 when the loss of pulpwood and lumber as result of the removal of productive forest land was presented. In the assessment of the impact on the uranium fuel cycle, a 30 year operating period was assumed. In no other sections of the FES is the assessment period indicated. Therefore, the staff believes that it is inconclusive whether a 30 year or a 40 year life was utilized in the environmental assessment. Thus, the licensee should assume that a 30 year life was utilized unless otherwise stated and should assess the extension of the operating license accordingly.