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U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

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**RE: EPA Review and Comments on  
Draft Generic Environmental Impact Statement (GEIS) for  
License Renewal of Nuclear Plants, Supplement 4  
Edwin I. Hatch Nuclear Plant, Units 1 and 2  
Draft NUREG 1437  
Appling County, Georgia  
CEQ No. 000380**

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 document entitled "Generic Environmental Impact Statement for License Renewal of Nuclear Plants Regarding the Edwin I. Hatch Plant, Units 1 and 2", Draft Report for Comment, NUREG-1437 (Draft GEIS). This document provided information to educate the public on general and project specific environmental impacts and analysis procedures, and allowed the public review and disclosure aspects of the NEPA process. The purpose of this letter is to provide the Nuclear Regulatory Commission (NRC) with EPA's comments regarding concerns of potential impacts of the renewal of the Edwin I. Hatch Nuclear Plant (Plant Hatch) Operating License. In addition, EPA has received correspondence from concerned citizens who have voiced their concerns over the Plant Hatch relicensing.

Plant Hatch is a nuclear power electric generating facility that has process water discharges regulated by the National Pollutant Discharge Elimination System (NPDES) program which provides effluent guidelines for the steam electric generating category, including cooling tower blowdown and low volume waste. NPDES programs in the State of Georgia are managed by the Georgia Environmental Protection Division (EPD). According to Georgia EPD, Plant Hatch is in compliance with its NPDES permit, and a recent search of EPA's Permit Compliance System likewise shows no NPDES violations for this facility.

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Add = A. Beranek (AFB)

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EPA has reviewed correspondence of concerned citizens who have voiced concerns over the relicensing of Plant Hatch. These concerns referenced potential and alleged spills of radioactive materials at the site, and alleged radioactive materials contaminating the environment. While EPA is concerned about these allegations, EPA does not regulate the radioactive components of any waste streams; that is the responsibility of the Nuclear Regulatory Commission (NRC). Regulatory levels of  $\alpha$ ,  $\beta$ , and  $\gamma$  radioactivity for all waste streams are under the authority of NRC and their state regulatory counterpart. The NRC and its licensee share a common responsibility to protect public health and safety. Therefore, we are forwarding copies of this correspondence to NRC under separate cover, and request that the concerns are thoroughly addressed in the Final EIS.

Based upon the information provided in the Draft GEIS we rate the document "EC-2," that is, there are environmental concerns on some aspects of the proposed project, and more information is needed. Specifically, more information is needed regarding environmental justice, clarification of potential impacts, and on-site groundwater wells. The attached comments detail our concerns regarding the Plant Hatch relicensing.

Thank you for the opportunity to comment on this Draft GEIS. If you have any questions or require more information please contact Ramona McConney of my staff at (404) 562-9615.

Sincerely,

A handwritten signature in black ink, appearing to read "Heinz Mueller". The signature is fluid and cursive, with the first name "Heinz" and last name "Mueller" clearly distinguishable.

Heinz J. Mueller, Chief  
Office of Environmental Assessment

EPA Review and Comments on  
Draft Generic Environmental Impact Statement, Supplement 4  
Edwin I. Hatch Nuclear Plant, Units 1 and 2  
NUREG 1437  
Appling County, Georgia  
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**GENERAL:**

Throughout the document, there are references to both a Generic Environmental Impact Statement (GEIS) and a Draft Supplemental Environmental Impact Statement (DSEIS). Clarification of the document format is needed.

There is concern that the plant is exempted from certain regulations, such as the Georgia Coastal Zone Management Act and other local land use and/or zoning restrictions, due to its location. Are these elements being tracked and can the results be quantified?

Submission of all referenced documents would decrease the amount of review time. For example, the Office of Nuclear Reactor Regulation office letter (NRC 1999b).

**WATER:**

*Drinking Water & Underground Injection Control:* Information reviewed from the Safe Drinking Water Information System (SDWIS) showed that the plant has not experienced a Safe Drinking Water Act (SDWA) violation since 1993 and no health-based violations or monitoring, reporting, and other violations have been reported. With over four new Rules being promulgated through the SDWA within the next 3-8 years, how will the owners address the impact of these regulations?

There are inconsistencies regarding the number of Drinking Water wells permitted at the site and the associated ID numbers for these wells. In Appendix E, it is stated that the permit authorizes withdrawal from two wells, on pages 2-30 and 2-31, it is stated that there are three wells, and later in the document it is stated that four wells are permitted. There should be consistency in the number of wells operated by the facility.

The Drinking Water ID number of the wells reported in the document were not consistent with the ID number assigned to the facility by the State. Not having the correct information, including the ID numbers, slowed the review process.

**ENVIRONMENTAL JUSTICE:**

Per Executive Order 12898 (59 FR 7629), Environmental Justice (EJ) is to be considered under NEPA. The document mentions EJ, but on pages 3-3, 4-20, it is stated the EJ was not addressed. More details are needed in order to make an informed assessment and to provide more clarification for information provided. Specifically, page 4-27 presents a list of five parameters that could impact human populations, however, there are no explanations of how these parameters could migrate to impact surrounding areas, nor an

explanation of what the potential impacts could be. Clarification and more details are needed.

More information is needed to clarify what is meant by water use conflicts, what the source of potential electric shock is, which microbial organisms are of concern and what their potential impacts are, and more detail on your evaluation of postulated accidents with respect to EJ populations. It is also unclear what environmental pathway some of these parameters would use to impact human populations.