

**From:** "Sokolsky, David" <DDS2@pge.com>  
**To:** "dgeis@nrc.gov" <dgeis@nrc.gov>  
**Date:** 12/21/01 7:40PM  
**Subject:** GEIS COMMENTS

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The attached WORD file contains Pacific Gas & Electric Company comments on the draft Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities, NUREG-0586, Supplement 1. If you have any questions on these comments, please contact me.

David Sokolsky  
Supervisor of Licensing  
Humboldt Bay Power Plant  
Phone 707-444-0801  
Internal 8-375-0801

**CC:** "Moulia, Thomas" <TAM1@pge.com>, "Nugent, Patrick" <PxN2@pge.com>

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Add = M. Masnik (MTM2)

## PG&E COMMENTS TO FGEIS

DECEMBER 20, 2001

- The last paragraph in the Conclusions section of the Executive Summary, and page 2-3 of Section 2.2.1, state that a licensee would have to submit a license amendment request if environmental assessments are outside the bounds of the GEIS or if the environmental impacts of a decommissioning activity have not been previously reviewed. What is the licensing document that should be modified in the license amendment request? Section 2.2.1 states the Environmental Report should be revised, but the PSDAR may be a more appropriate document.
- Section 4.3.9.1, page 4-33, refers to the licensee's FSAR. Suggest adding the words "or equivalent" after "FSAR" since some licensees have a defueled safety analysis report (DSAR) instead of a FSAR.
- Section 4.3.12.1, page 4-47, second line – Add a period after the word "effects" and begin the next sentence with the word "Socioeconomic."
- The following Conclusions sections discuss environmental impacts that may have small, moderate or large impacts:
  - 4.3.1.4 (Onsite/Offsite Land Use)
  - 4.3.5.4 (Aquatic Ecology)
  - 4.3.6.4 (Terrestrial Ecology)
  - 4.3.9.4 (Radiological Accidents)
  - 4.3.10.3 (Occupational Issues)
  - 4.3.12.4 (Socioeconomics)

The FGEIS is not clear what, if any, actions a licensee should take depending on if the impacts are small, moderate or large?

- Section 4.3.4.2, page 4-13, "Potential Impacts of Decommissioning Activities on Air Quality," does not address the impact of commercial replacement power to offset the loss of generation at the decommissioned site. Replacement power from fossil fueled sources would have a measurable impact on air quality at the site of generation.
- Section 3.1.4, page 3-15, does not reflect that alpha-emitting Transuranic radioactivity is significant at some plants. This radioactivity is formed after failed fuel releases small amounts of Uranium (as well as fission products) to the reactor coolant. Subsequent activation of the Uranium results in the formation of Transuranic isotopes of Plutonium, Americium and Curium, most of which decay with alpha radiations. For the plants where this issue is significant, the production of airborne alpha radioactivity during

decommissioning activities must be carefully controlled to avoid radiation exposure from inhaled alpha radioactivity.

**From:** DGEIS  
**To:** DaM2  
**Date:** 1/7/02 7:28AM  
**Subject:** Fwd: GEIS COMMENTS

Comments from PGE