

2/13/02
67 PR 6758
(1)

RECEIVED
March 2, 2002

2002 MAR 13 PM 2:55

Rules and Directives
Branch
USNRC

Chief, Rules and Directives Branch
U.S. Nuclear Regulatory Commission
Mail Stop T-6 D59
Washington, D.C. 20555-0001

Docket No. 50-461
Facility Operating License No. NPF-62

Comments on Draft Environmental Assessment Associated with the Power Uprate at Clinton
Power Station Published in the Federal Register February 7, 2002

1. Page 6759, Cold Shock – It is stated that "...the increase in fish mortality due to cold shock will not be significant..." Since circulating water flow is not planned to be increased, the temperature rise in the cooling water as it moves through the condenser is expected to increase in the same proportion as the power uprate (20%). Currently, the water temperature rise as it passes through the condenser is about 23 degrees F. After power uprate, it should approach 28 degrees F. The higher temperature rise can be expected to increase the area over which a cold shock effect can occur and increase the mortality rate in the area where the water temperature will exceed the thermal profiles associated with the current 23 degree F rise. In December 2002, Clinton Power Station experienced a cold shock event when the reactor was suddenly isolated from the condenser. Estimates of over 10,000 fish killed were reported. It appears that no effort is being proposed to mitigate the increased impact of cold shock from the power uprate, even though the impact could be greater than 20% due to both higher mortality rates and a larger impact area.
2. Page 6761, Social and Economic Effects – It is stated "Increased revenue from sale of additional power output will expand the local tax revenue, benefiting the community directly." What is the basis for this statement? To the best of this writer's knowledge, there is no linkage between the plant capacity or generation and the taxes paid to local taxing bodies. If the assessment was trying to imply that revenue from increased generation would somehow benefit the local economy, it should be noted that the plant owners are not located in the area and any increase in taxes associated with revenue would not occur locally. Please identify the tax revenue being addressed in the above quoted statement that benefits the local economy that is associated with the sale of additional power or withdraw the statement.
3. General Comment – Increased power output from the reactor will result in increased steam flow from the reactor to the turbine. Erosion of piping walls from steam flow is a complex function of the fluid velocity and moisture content. There is no discussion of this matter in the assessment. Was the current steam pipe monitoring program reviewed to determine its adequacy under higher flow/different moisture conditions? If not, the probability of an existing radiological release event (main steam line break) was increased. This issue is also applicable to other piping systems where increased flow of up to 20% may occur (Feedwater, condensate, etc.).

Dale L. Holtzsch

Dale L. Holtzsch
RR 1, Box 72A
Weldon, IL 61882

Template = ADM-013

*E-RIDS = ADM-03
all = J.B. Hopkins (56h1)*