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TO: Mr. Muntzing		ORIG: 1	CC: 1	OTHER	SENT AEC PDR X SENT LOCAL PDR X		
CLASS: <u>U</u> PROP INFO		INPUT	NO CYS REC'D: 2	DOCKET NO: 50-263			

DESCRIPTION:
Ltr re our 5-26-72 ltr...furnishing comments on the draft environmental statement for Monticello Nuclear Generating Plant, Unit 1.

ENCLOSURES:

**ACKNOWLEDGED
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PLANT NAMES: Monticello, Unit 1

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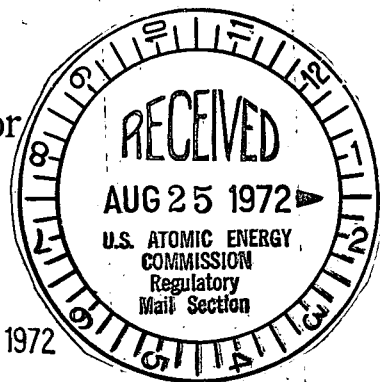
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United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240



ER-72/655

AUG 24 1972

50-263

Dear Mr. Muntzing:

This is in response to Mr. Muller's letter of May 26, 1972, requesting our comments on the Atomic Energy Commission's draft statement, dated May 1972, on environmental considerations for Monticello Nuclear Generating Plant, Unit No. 1, Wright County, Minnesota.

General

The Geological Survey of this Department made a safety-oriented review of geologic and hydrologic aspects of the site for the Atomic Energy Commission in 1967.

Comments in regard to this Department's responsibilities under the Fish and Wildlife Coordination Act were expressed in the former Commissioner of the Fish and Wildlife Service letter dated February 23, 1967, and the Secretary of the Interior letter dated April 4, 1969. The Department did not object to construction and operation of the project because the applicant provided assurance that it would conduct the necessary radiological and environmental monitoring and other studies and maintain sufficient flexibility in project operations to adequately protect environmental values.

We commend the applicant for its early decision to construct and operate cooling towers to minimize adverse impacts, for its environmental concern as evidenced by efforts being directed toward ongoing monitoring studies, and for its cooperative spirit in working with this Department in solving past environmental problems associated with this project. We are confident that through continuing joint efforts, unforeseen problems that may develop will be solved to the satisfaction of all parties.

Our comments on specific subjects are presented in the following paragraphs according to the format of the statement or according to specific subjects.

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Ecology of Site and Environs

It is mentioned on page II-13 that 160 of approximately 220 acres are being allowed to return to native vegetation or planted with conifers. For esthetic and possible pathogenic reasons, we do not recommend that pines be planted on this area because of the possibility of the high water table which eventually leads to slow growing or diseased pine trees. If pine trees are planted on the site, it is recommended that they be planted only on well-drained soils.

Transmission Lines

According to page III-1 the transmission line routings attempted to avoid active farm areas and where possible, municipalities, county parks, and recreational, natural scenic and historic areas. In order to adequately assess the environmental impact of the transmission lines, we believe that the statement should address itself to elucidating this statement. This additional discussion could be in the form of a discussion with maps and illustrations showing the location of recreational, natural scenic and historic areas traversed by the transmission lines, particularly for the historic landmarks listed on page II-51 and the wildlife areas shown in Figure 1-1 of the applicant's environmental report dated November 3, 1971. If no historic, scenic, county parks or recreational areas are traversed by the transmission lines, it should be so stated.

We suggest that the applicant make provisions for wildlife management including public access for hunting to the extent compatible with project purposes. Also, since herbicides, Tordon 155, will be used, the publication entitled, "Chemical Vegetation Control Manual for Fish and Wildlife Management Programs," issued in January 1968 as Resource Publication 48 by the Bureau of Sport Fisheries and Wildlife, should be consulted for policy on the use of pesticides, herbicides, and related chemicals. This publication should also be referenced in the statement.

Chemical and Sanitary Wastes

Although the average residual chlorine concentration in the discharge canal is less than 0.05 ppm, it is about 10 times that amount for short durations. Generally, we

think that a maximum residual chlorine concentration of more than 0.1 ppm should not take place and that chlorine should be completely eliminated if possible. It has been found that concentrations of 0.03 ppm are toxic to some aquatic organisms. The statement should discuss changes in methods of operation or structural design that could be employed to eliminate chlorine from the effluent.

Cooling Tower Drift

The statement does not include a discussion of the dissolved solids which would be carried from the tower in the drift. Such solids could cause offsite deposition and corrosion problems; therefore, an estimate should be included in the report as to the amount of solids which may be contained in the drift, and reference should be made to procedures to be followed in minimizing their environmental impact.

Land Use

We suggest that consideration be given to a fish and wildlife management and public use plan for Thompson Island and the remainder of the 1,325-acre project site to assure maximum use of project lands and waters to the extent compatible with project purposes.

Water Use

The thermal effects on the Mississippi River of the various modes of condenser cooling have been predicted in the statement. Since accurate predictions of this type are difficult, a detailed temperature monitoring program of the river beginning at the plant and extending several miles downstream should be initiated so that the type of cooling system operation to be selected for various temperature and discharge conditions may be based on accurate data.

Effects of Intake Structure

We do not think that material that collects on the screens, such as debris, fish, and other accumulations should be washed from the screens and returned directly to the river. In order to minimize degradation of the river water, it is suggested that these accumulations be handled as noncontaminated solid wastes, and the method of disposal described in the report.

Environmental Impact of Postulated Accidents

This section contains an adequate evaluation of impacts resulting from accidents through Class 8 for airborne emissions. However, the environmental effects of releases to water are lacking. Many of these postulated accidents listed in tables VI-1 and VI-2 could result in releases to the Mississippi River and should be evaluated in detail.

We also think that Class 9 accidents resulting in both air and water releases should be described and the impact on human life and the remaining environment discussed as long as there is any possibility of occurrence. The consequences of an accident of this severity could have far-reaching effects on land and in the Mississippi River which could persist for centuries.

The subject of transportation accidents is discussed extensively, but little mention is made of the means for handling spills of low-level wastes. It is suggested that emergency procedures be developed for maximum containment of low-level wastes, as well as minimized personnel contamination under the circumstances where a severe accident might occur and result in spillage of such low-level wastes.

Adverse Effects Which Cannot be Avoided

This section should discuss the extent and type of wildlife and the loss in animal populations due to project construction and operation.

Short-Term Uses and Long-Term Productivity

Short-term uses of the land and water should be compared to the plant's operational impact on the long-term productivity of fish and wildlife.

Irreversible and Irretrievable Commitment of Resources

According to page IX-1, if the reactor is dismantled at the end of its useful life, some land would be required to permanently store highly radioactive structural components of the reactor facilities as well as other radioactive wastes. The Monticello site, on the flood plain of the Mississippi River, would be a particularly unsuitable location for the burial of highly radioactive materials, particularly if they contain long lived

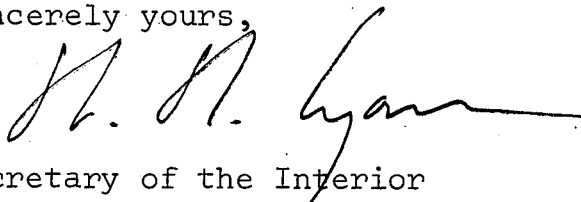
radionuclides. These burial materials would be exposed to ground water which could become contaminated, and also to flooding and possibly erosion. Monitoring would be required for an indefinitely long period of time.

If permanent burial of radioactive materials at this site is a possibility, the environmental consequences should be considered at this time.

This section should also describe the fish and wildlife resources lost annually because of the project construction and operation. Resources foregone are generally irretrievable for all practical purposes.

We hope these comments will be helpful in the preparation of the final environmental statement.

Sincerely yours,



Deputy Assistant

Secretary of the Interior

Mr. L. Manning Muntzing
Director of Regulation
U. S. Atomic Energy Commission
Washington, D. C. 20545

Regulatory

File Cy.

