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FROM: Carolina Power & Light Company Raleigh, North Carolina 27602 J. A. Jones	DATE OF DOC: 06-11-73	DATE REC'D 06-14-73	LTR X	MEMO	RPT	OTHER
TO: Mr. John F. O'Leary	ORIG 1	CC	OTHER	SENT AEC PDR X SENT LOCAL PDR X		
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DESCRIPTION:

Ltr furnishing info reg CP&LC's comments on the draft environmental statement & trans:

ENCLOSURES:

APPENDIX A - Carolina Power & Light Company comments on AEC Draft Environmental Statement H. B. Robinson Steam Electric Plant, Unit 2.

PLANT NAMES: H. B. Robinson, Unit 2

FOR ACTION/INFORMATION 06-14-73 rht

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Carolina Power & Light Company

June 11, 1973



Mr. John F. O'Leary
Directorate of Licensing
U. S. Atomic Energy Commission
Washington, D. C. 20545

RE: DOCKET NO. 50-261

Dear Mr. O'Leary:

Carolina Power & Light Company has reviewed the Commission's draft Environmental Statement for the H. B. Robinson Steam Electric Plant Unit No. 2, and we are providing our initial comments at this time. The Company is continuing its review of the draft Environmental Statement, and we anticipate submitting further information to the Commission relating to the Commission's environmental review. The Company is aware that Federal and State agencies may provide comments to the Commission relevant to the H. B. Robinson Unit No. 2 draft Environmental Statement. Should agency comments require further response from Carolina Power & Light Company, we will provide the necessary information to the Commission at that time.

The attached Appendix A to this letter contains the comments which Carolina Power & Light Company has developed during our initial review of the draft Environmental Statement.

Yours very truly,

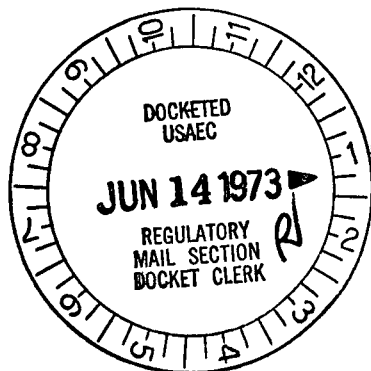
J. A. Jones
Executive Vice President

JAJ/jc
Attachment

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Appendix A

CAROLINA POWER & LIGHT COMPANY COMMENTS ON AEC DRAFT ENVIRONMENTAL STATEMENT H. B. ROBINSON STEAM ELECTRIC PLANT UNIT NO. 2

The following comments on the draft Environmental Statement are preceded by a reference to the draft Environmental Statement denoting the Section, Table, or Figure to which the comment applies.

The comments are divided into two main parts. Part I contains comments on the Summary and Conclusions listed in the draft Environmental Statement. Part II contains the Company's comments on the main text of the draft Environmental Statement.

PART I - SUMMARY AND CONCLUSIONS

Item 3, Paragraph b: This paragraph contains a statement concerning possible ecological damage from the use of "all-terrain vehicles" on the transmission line rights-of-way. While Carolina Power & Light Company has no direct control over the use that private land owners make of transmission line rights-of-way, the Company does try to discourage the use of these rights-of-way for four-wheel drive vehicles and motorbikes. In the area traversed by the transmission lines emanating from the H. B. Robinson Plant, there is generally very little slope which might result in erosion. The Company feels, therefore, that this condition although uncontrolled by Carolina Power & Light, will present no real problems.

Item 7, Paragraph a: The Company is evaluating methods for monitoring fish impingement and we will submit our comments on this item at a future date.

Item 7, Paragraphs b, c, d, and e: The Company is presently evaluating these items and will submit the results and proposals acceptable to the AEC Staff at a future date.

PART II - MAIN TEXT

Section 1: INTRODUCTION

Section 1.1: It should be noted that Westinghouse was contracted on a turn-key basis to design and construct the plant. Ebasco Services was the engineering and construction contractor. Westinghouse supplied the NSSS and turbine generator.

Table 1.1: The U. S. Army Corps of Engineers discharge permit is no longer applicable since the passage of the Federal Water Quality Act Amendments of 1972. The application has been transferred to the EPA for a National Pollution Discharge Elimination System (NPDES) Permit.

Section 3: THE PLANT

Section 3.4: The AEC Staff has stated that ". . . it appears that a temperature differential of 20°F is more representative of actual plant operation." CP&L has again reviewed available information, and based on this review, we still conclude that a temperature rise of 18°F occurs in Unit No. 2's circulating water system.

Section 3.5.1: The Commission has estimated 1000 curies of tritium per year released from the plant. Operating data for 1972 showed an annual release of tritium liquid of 429 Ci/yr. The AEC Staff has also estimated radioactive liquid releases (excluding tritium) to be 30 Ci/yr., and has noted that this calculated figure exceeds the plant technical specifications. Actual operating experience of liquid release during 1972 was only 0.983 curies/yr.

Section 5: ENVIRONMENTAL EFFECTS OF OPERATION

Section 5.2: With regard to the U. S. Army Corps of Engineers Refuse Act Permit Application, this permit is no longer required in view of the 1972 Federal Water Quality Act amendments. In its place,

an NPDES Permit is required. The Robinson Impoundment has been recertified by the State of South Carolina in accordance with the 1972 FWQA amendments.

Section 5.5.3: Carolina Power & Light Company will establish the requested monitoring of fish impingement. Details will be transmitted at a future date. In addition, a monitoring program will be defined and will be carried out should chlorination become necessary at the plant.

Section 6: ENVIRONMENTAL MONITORING PROGRAMS

The Company is presently reevaluating the radiological monitoring program. When details of this reevaluation are complete they will be transmitted to the AEC Staff for their review.

Section 8: IMPLICATION OF PROJECT

Section 8.1.2 and 8.1.4: Reference is made in these sections to the CARVA Pool. The CARVA Pool is no longer in existence. Carolina Power & Light Company is in the VACAR subregion of the Southeastern Electrical Reliability Council (SERC).

Section 8.3: The discussion of all-terrain vehicles and possible ecological damage resulting from their use on transmission line rights-of-way was discussed in Part I of this appendix.

Section 10: BENEFIT-COST ANALYSIS

Section 10.2: The CARVA Pool is also mentioned in this section and should be deleted, as discussed in the comments on Section 8.1.2 and 8.1.4.