

NRC DISTRIBUTION FOR PART 50 DOCKET MATERIAL
(TEMPORARY FORM)

CONTROL NO: **7205**

FILE: _____

FROM: Carolina Power & Light Co. Raleigh, N. C. J.A. Jones		DATE OF DOC 7-3-75	DATE REC'D 7-7-75	LTR XXX	TWX	RPT	OTHER
TO: Benard C. Rusche		ORIG 1 Signed	CC	OTHER	SENT NRC PDR <u>XXXX</u> SENT LOCAL PDR <u>XXXX</u>		
CLASS	UNCLASS XXXX	PROP INFO	INPUT	NO CYS REC'D 1	DOCKET NO: 50-261		

DESCRIPTION:
Re 4-18-75 our ltr...of FES ...
Ltr. furnishing comments on FES & giving areas
which are in error and require clarification....

(1 cy. ltr. rec'd)

PLANT NAME: H.B. Robinson # 2

ENCLOSURES:

ACKNOWLEDGED

DO NOT REMOVE

FOR ACTION/INFORMATION

VCR-7-7-75

BUTLER (L) W/ Copies	SCHWENCER (L) W/ Copies	ZIEMANN (L) W/ Copies	REGAN (E) W/ Copies
CLARK (L) W/ Copies	STOLZ (L) W/ Copies	DICKER (E) W/ Copies	LEAR (L) W/ Copies
PARR (L) W/ Copies	VASSALLO (L) W/ Copies	KNIGHTON (E) W/ Copies	SPIES W/ Copies
KNIEL (L) W/ Copies	PURPLE (L) W/ Copies	YOUNGBLOOD (E) W/ Copies	LPM W/ Copies

INTERNAL DISTRIBUTION

<u>REG FILE</u> NRC PDR OGC, ROOM P-506A ² GOSSICK/STAFF CASE GIAMBUSSO BOYD MOORE (L) DEYOUNG (L) SKOVHOLT (L) GOLLER (L) (Ltr) P. COLLINS DENISE REG OPR FILE & REGION (2) MIPC	<u>TECH REVIEW</u> SCHROEDER MACCARY KNIGHT PAWLICKI SHAO STELLO HOUSTON NOVAK ROSS IPPOLITO TEDESCO LONG LAINAS BENAROYA VOLLMER J. Collins	<u>DENTON</u> GRIMES GAMMILL KASTNER BALLARD SPANGLER <u>ENVIRO</u> MULLER DICKER KNIGHTON YOUNGBLOOD REGAN PROJECT LDR HARLESS Dittman	<u>LIC ASST</u> R. DIGGS (L) H. GEARIN (L) E. GOULBOURNE (L) P. KREUTZER (E) J. LEE (L) M. MAIGRET (L) S. REED (E) M. SERVICE (L) S. SHEPPARD (L) M. SLATER (E) H. SMITH (L) S. TEETS (L) G. WILLIAMS (E) V. WILSON (L) R. INGRAM (L) H. DUNCAN	<u>A/T IND.</u> BRAITMAN SALTZMAN MELTZ <u>PLANS</u> MCDONALD CHAPMAN DUBE (Ltr) E. COUPE PETERSON HARTFIELD (2) KLECKER EISENHUT WIGGINTON End (4)
---	---	--	---	--

EXTERNAL DISTRIBUTION

1 - LOCAL PDR Hartsville S.C.	1 - NATIONAL LABS ANL	1 - PDR-SAN/LA/NY
1 - TIC (ABERNATHY) (112)(10)	1 - W. PENNINGTON, Rm E-201 GT	1 - BROOKHAVEN NAT LAB
1 - NSIC (BUCHANAN)	1 - CONSULTANTS	1 - G. ULRIKSON ORNL
1 - ASLB	NEWMARK/BLUME/AGBABIAN	
1 - Newton Anderson		
- ACRS HOLDING/SENT		



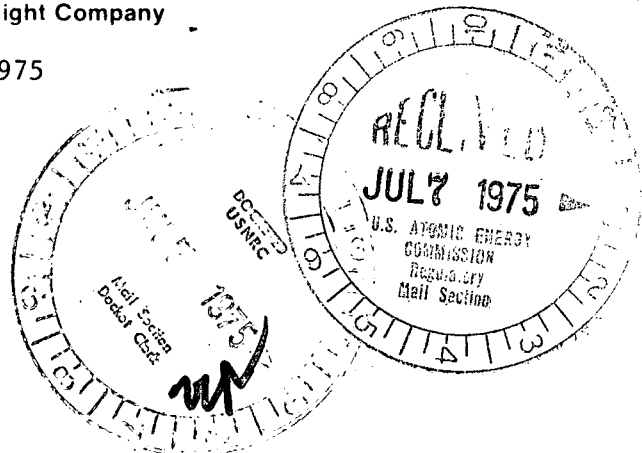
Carolina Power & Light Company

July 3, 1975

Regulatory

File CY4

Mr. Benard C. Rusche, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555



RE: H. B. ROBINSON UNIT NO. 2
DOCKET NO. 50-261
COMMENTS ON FINAL ENVIRONMENTAL STATEMENT

Dear Mr. Rusche:

On April 18, 1975, the U. S. Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation issued the Final Environmental Statement for the H. B. Robinson Steam Electric Plant Unit No. 2. Carolina Power & Light Company has reviewed the document and has determined that the following are areas which are in error and require clarification.

In Section 2.5.1, Surface Water, the average concentrations of water chemistry parameters were extracted from an EPA-STORET printout of Water Discharge Permit No. 074-3BK-2-000426, June 28, 1971. Subsequent data, collected between March 1973 and March 1975, indicate the following (average) water quality concentrations:

<u>Parameter</u>	<u>Average Concentration (ppm)</u>	<u>No. Samples Analyzed</u>	<u>Range</u>
Alkalinity (as CaCO ₃)	1.6	21	0-6
COD	24	23	4-63
Total solids	112	23	10-267
Dissolved solids	85	23	8-204
Ammonia (as N)	0.05	22	0.01-0.18
Kjeldahl nitrogen (as N)	0.33	22	0.07-1.34
Sulfate	3.07	22	1-12

Section 3.5.1, Liquid Waste Processing System, the final paragraph on page 3-28 indicates that the calculated amount of radioactivity in liquid effluents exceeds the existing technical specification. This is based on the release limits for unidentified radionuclides and not for those releases where the nuclide composition is known. This statement is misleading since the calculated release is within the limit for identified discharges.

Section 5.2.1, Heat Dissipation to Surface Water, on page 5-5 references South Carolina Permit No. 307 and indicates that it was issued on June 24, 1967. The permit, however, was issued in June of 1964.

In Section 5.2.3.2, Federal Effluent Guidelines and Standards, states that the FWPCA Section 316(a) exemption request has been deferred pending a demonstration. This is only partially correct. While EPA has deferred an ultimate decision, it has acted affirmatively on CP&L's request for an opportunity to make a 316(a) demonstration. This affirmative determination has been supported by the State of South Carolina.

Section 5.2.3.2, Federal Effluent Guidelines and Standards, states that the Company will be required to provide closed cycle cooling consistent with the requirements of best available technology economically achievable in the event the 316(a) demonstration is unsuccessful. This is incorrect. 40 CFR Part 423 does not require closed cycle cooling for the H. B. Robinson plant because it falls within the exception established for plants on existing cooling lakes. The only basis for requiring closed cycle cooling in this instance would be to meet State water quality standards pursuant to Section 301(b)(1)(C).

Section 5.2.3.2 further states that notwithstanding the deferral of Section 316(a) considerations, the Company will be required to proceed with development of plans and/or facilities to ensure compliance with applicable water quality standards by July 1, 1977. This is contrary to the express policy of EPA and to the express terms of the NPDES permit which provide that a compliance schedule will be established at the conclusion of the 316(a) demonstration. The requirement is more accurately stated in footnote "d" to Table 5.1 of the FES.

Table 5.4 of Section 5.4.3, Gaseous Effluents, lists the calculated annual individual doses due to gaseous effluents from H. B. Robinson Unit 2. The calculated thyroid dose to a child due to consumption of milk from the goat nearest the plant appears to be in error. The assumptions used for the calculation, footnote b to Table 5.4, are 700 milliliters daily consumption of goat's milk for two months annually. The dose presented in Table 5.4 is 230 mrem/yr. By using the equations presented in Regulatory Guide 1.42 and the assumption that the milk is consumed only two months annually, the dose calculated is approximately one-sixth the value presented in Table 5.4.

Section 5.4.3, Gaseous Effluents, discusses the radiological dose calculations for H. B. Robinson Unit 2. The X/Q values used for the dose calculations are developed from the seven months of 1974 data. The two years of data (1967-1969) submitted with the FSAR should be more appropriate since the data covers a much longer period of time and should be more representative.

Section 5.5.2.1, Fish Impingement, states: "the applicant has collected fish impingement at the cooling water intake screens during 24 hours of each month of 1974, except during March from Unit 1 and May from Unit 2." It should be noted that the sampling periods are 48 hours in duration for each month, but the results are reported as 24-hour averages.

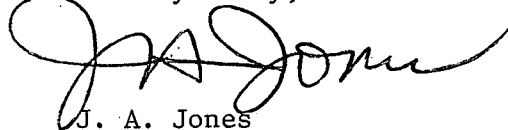
Section 5.5.2.2, Entrainment of Microorganisms and Ichthyoplankton, states: "The applicant attempted to initiate a sampling program for ichthyoplankton entrainment during the latter portion of the 1974 spawning season. However, these attempts have not yielded any usable data." In February, 1975, a program of ichthyoplankton entrainment was successfully initiated. Usable data have been obtained from this program which is scheduled to continue through December, 1975.

Section 5.5.2.4, Chlorination and Other Chemical Discharges, states that the applicable EPA guidelines limit chlorine concentrations to 0.5 milligrams per liter maximum and 0.2 milligrams per liter average in discharged water. This should be corrected to reflect that the EPA regulations relate to free available chlorine.

Section 6.3.2, Ecological, states that the study program in support of CP&L's application for a Section 316(a) exception to the 1972 Amendments to the FWPCA will be conducted through the latter half of 1975 and reported on in the last quarter of 1975. Most of the field work for the study will be completed in the last quarter of 1975. Therefore, the report will be submitted based on the schedule set forth in CP&L Response to Question 2 under the Aquatic Ecology section of Supplement No. 3 to the H. B. Robinson Environmental Report.

We will be glad to discuss these comments or any questions concerning the H. B. Robinson Unit 2 environmental review with your staff.

Yours very truly,



J. A. Jones
Executive Vice President
Engineering, Construction & Operation

JAJ/kr