

APPENDIX B

IN REPLY REFER TO:

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
WASHINGTON, D. C. 20240

MAR 12 1970

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

Dear Mr. Price:

This is in reply to Mr. Boyd's letter of November 3, 1969, concerning Amendment No. 10 to the application by the Carolina Power and Light Company for an operating license for the H. B. Robinson Nuclear Power Station, Unit 2, Darlington County, South Carolina, AEC Docket No. 50-261.

The applicant's proposed environmental radiological monitoring program is not in complete agreement with recommendations included in our letter of February 17, 1967. While the program includes the collection of water and fish samples, it does not include the collection of benthic plants and animals. The applicant states that no provisions are to be made for the collection of benthic organisms since they do not represent a source of potential human exposure.

We do not agree that organisms such as clams and crayfish do not contribute to the food chain of man. Although it may be that few of them are consumed directly by man, radionuclides concentrated by benthic organisms can be transferred through shellfish, predatory fishes, and other aquatic-feeding wildlife to man. By sampling benthic organisms, radioactivity can be detected before significant amounts accumulate in the aquatic environment.

We are also concerned that populations of fish and wildlife be maintained in adequate numbers and that such populations continue to be safe for human use.

Since trends indicate that the use of fish and wildlife resources will increase as human populations and leisure time increase, benthic and other organisms that are little used now may be used both more extensively and intensively in the future. The buildup of radionuclides, or lack thereof as the case may be, in the environment should be documented so that reasoned actions can be taken toward meeting public needs.

For the above stated reasons, we urge that the Carolina Power and Light Company be required to include in its environmental surveillance program, samples of clams, crayfish, and aquatic plants collected as near as practical to the reactor effluent outfall. Such sampling should be continued until it can be demonstrated that the radioactivity released from the station is not concentrating in these organisms.

The opportunity for presenting our views on this amendment is appreciated.

Sincerely yours,

Charles H. Meacham

Commissioner