

# CATEGORY 1

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SUBJECT: Forwards comments on plant-specific draft suppl to NUREG-1437.Duke agrees with listed conclusions stated in draft SEIS.

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August 17, 1999

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Washington, DC 20555

Subject: License Renewal  
Comments on Plant-Specific Draft Supplement to NUREG-1437  
Oconee Nuclear Station  
Docket Nos. 50-269, -270, -287

By letter dated July 6, 1998, Duke Energy Corporation submitted an Application for Renewed Operating Licenses for Oconee Nuclear Station, Units 1, 2, and 3 (Application). Volume IV (Environmental Report) of the Application contains the environmental information required by 10 CFR Part 51. By two letters, each of which was dated December 29, 1998, the NRC staff requested additional information to complete its review of the environmental information. Duke provided written responses to these requests by letter dated March 4, 1999.

The results of the staff review of the environmental information provided in the Application are contained in the plant-specific draft supplement to NUREG-1437, Generic Environmental Impact Statement for License Renewal of Nuclear Power Plants, regarding the renewal of the operating licenses for Oconee Nuclear Station, Units 1, 2, and 3 (draft SEIS). By letter dated May 20, 1999, the NRC staff requested comments on the draft SEIS.

Duke agrees with the conclusions stated in the draft SEIS that:

- "Current measures to mitigate environmental impacts of plant operation were found to be adequate, and that no additional mitigation measures were deemed sufficiently beneficial to be warranted."
- "... the adverse impacts of likely alternatives will not be smaller than those associated with continued operation of ONS."

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Regarding the issue of transmission lines (discussed in SEIS Section 2.1.7), Duke acknowledges the position of the NRC as set forth in Section 2.1.7 of the SEIS (p. 2-13). However, Duke's position continues to be that the scope of the transmission lines that should be considered within the scope of the proposed action, as defined in the environmental report, are those lines that run from the Oconee Turbine Building to the 230kV and the 525kV switchyards. The bases for Duke's position are set forth in Section 4.9 of the Environmental Report and as part of Duke's March 4, 1999 response to NRC Request for Additional Information 11.

Attachment 1 provides our additional comments on the draft SEIS. In addition, other comments of an editorial nature have been previously discussed with the NRC staff. Since the NRC staff was aware of these items, Duke did not include these items in this letter.

If there are any questions regarding these comments, please contact Bill Miller at 704-373-7900.

Very truly yours,

A handwritten signature in black ink that reads "M. S. Tuckman". The signature is written in a cursive style with a large, stylized "M" and "T".

M. S. Tuckman

xc: (w/ Attachment 1)

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**Attachment 1**

**Comments on**

**Generic Environmental Impact Statement**

**for**

**License Renewal of Nuclear Plants**

**Draft NUREG-1437**

**Supplement 2**

**Oconee Nuclear Station**

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Attachment 1  
Comments on Draft NUREG-1437  
Supplement 2  
Oconee Nuclear Station

**Chapter** Executive Summary, Frontmatter  
**Section** N/A

Number	Page	Line	Comment
1	xvii	14	CCW should be "Condenser Circulating Water"

**Chapter** 1.0 Introduction  
**Section** Table 1-1

Number	Page	Line	Comment
2	1-8	Table 1-1	The following permit should be added (Reference ER Table 7.2-1): Agency: SCDHEC Authority: RCRA, Section 3005 Requirement: Permit Permit Number: SCD043979822 Permit Issued: 3/9/1998 Activity Covered: Part A Hazardous Waste Permit, Interim Storage Facility for Mixed Wastes
3	1-8	11	Current NPDES permit is being in the process of being renewed. Line 11 should be revised to state: "The permit is currently being renewed <sup>(a)</sup> ."
4	1-8	8	"ONS has two permits for drinking water wells in protected area" is not a correct statement. ONS has one drinking water well for the restroom facilities at the Site Softball Field. The permit number for this well is 202098AI. (Note that the Duke ER had supplied the information on the wells. During the review of this draft SEIS, Duke found that the site has only one well permitted as a drinking water well).
5	1-8	11	Permit Number for SCDHEC FWPCA is incorrect. The correct permit number is SC0000515.
6	1-8	22	Revise footnote (a) to state: "A NPDES permit renewal application was submitted by Duke on March 27, 1998. The draft permit will be issued in mid-August for a 30 day public comment period. See Section 2.2.3."

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**Chapter** 2.0 Description of Nuclear Power Plant and Site and Plant Interaction with the Environment  
**Section** N/A

Number	Page	Line	Comment
7	2-1	9	Should be "Babcock & Wilcox."

**Chapter** 2.0 Description of Nuclear Power Plant and Site and Plant Interaction with the Environment  
**Section** 2.1 Plant and Site Description and Renewal Term Plant operation

Number	Page	Line	Comment
8	2-5	1	Revise sentence to state: "ONS is located on the shores of Lake Keowee. The main bodies of the lake lie to the north and to the southwest of the site."
9	2-5	32	Several of the amenities at the Visitor's Center (lakeside picnic center and landscaped grounds) are mentioned, but the nice nature trail is not mentioned. This trail is used extensively by civic organizations and schools and is a great place for wildflower tours.

**Chapter** 2.0 Description of Nuclear Power Plant and Site and Plant Interaction with the Environment  
**Section** 2.1.1 External Appearance and Setting

Number	Page	Line	Comment
10	2-6	Figure 2-4	Figure 2-4 appears to list the ONS 525 kV switchyard as the "825 kv Switchyard." Also the standard abbreviation for kilovolt is kV, not kv, as is used in this figure.



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**Chapter** 2.0 Description of Nuclear Power Plant and Site and Plant Interaction with the Environment  
**Section** 2.1.2 Reactor Systems

Number	Page	Line	Comment
11	2-7	12	Line 12 should be revised to state: "But because of their distance from the site, these zones ..."
12	2-7	29	Should be "Babcock & Wilcox."
13	2-7	34	ONS can use fuel up to 5% enrichment.  Line should be revised to state: "ONS fuel is low enriched (up to 5 percent by weight) ..."

**Chapter** 2.0 Description of Nuclear Power Plant and Site and Plant Interaction with the Environment  
**Section** 2.1.3 Cooling and Auxiliary Water Systems

Number	Page	Line	Comment
14	2-8	23-25.	Oconee License Renewal SER Section 2.2.3.6.3.2.1 (Page 2-102) <u>Intake Structure within Scope of License Renewal and Subject to an Aging Management Review</u> states that: "the licensing basis does not rely on the underwater weir nor recirculation of the intake canal water for decay heat removal after a loss of Lake Keowee event. Based on the above documentation, the staff agrees with the applicant's determination that the underwater weir is not within the scope of license renewal."  Therefore, the description of the function of this weir on Lines 23-25 is not applicable. It is appropriate to describe the weir and its location, but the description of the function should be deleted. Delete the sentence beginning: "The purpose of this dam is to retain...."
15	2-8	27	The sentence refers to Figure 2-4, showing the location of such intake features like the skimmer wall, intake structure, submerged dam, and the outfall. The location of the submerged dam is not shown on the figure.

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**Chapter** 2.0 Description of Nuclear Power Plant and Site and Plant Interaction with the Environment

**Section** 2.1.4 Radioactive Waste Management Systems and Effluent Control Systems

Number	Page	Line	Comment
16	2-9	19	Evaporation is not a waste processing method; therefore, evaporator concentrates are not produced.
17	2-10	18 – 20	The Radwaste Facility processes high-activity wastes, low-activity wastes and miscellaneous wastes from the Auxiliary Building, not the opposite as currently stated in lines 18 through 20.
18	2-10	26	Dilution is not considered part of processing. The waste is released prior to any dilution. However, hydro dilution flow is used in determining the release rate.  Delete statement: “(diluted to meet the permissible concentration limits for discharge)....”
19	2-10	35	The value “28,343 m <sup>3</sup> (944,773 ft <sup>3</sup> ) per year” is the potential waste generation rate. The liquid waste holdup capacity is approximately 80,000 gallons.
20	2-11	10	Gases are also produced in tanks and piping other than those holding liquid wastes (e.g. Letdown Storage Tank, Core Flood Tank).  Line should be revised to state: “... by the evolution of gases in liquids contained in tanks and piping.”
21	2-11	30	The word “limit” should be inserted after “rate.”

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**Chapter** 2.0 Description of Nuclear Power Plant and Site and Plant Interaction with the Environment

**Section** 2.1.5 Nonradioactive Waste Systems

Number	Page	Line	Comment
22	2-12	14-15	Change to "reactor coolant system make-up water, steam generator make-up water..."
23	2-12	15 - 18	These lines should be changed to state: "... and deborating demineralizers. Non-sanitary, nonradioactive wastes are neutralized and sent to the holding ponds, eventually being discharged to the Keowee River, downstream from the Keowee Hydroelectric Station. Sanitary wastes are routed to an aerated sewage lagoon. The effluents are treated by chlorination. Prior to discharge, the treated effluents from the sanitary waste treatment system are dechlorinated."

**Chapter** 2.0 Description of Nuclear Power Plant and Site and Plant Interaction with the Environment

**Section** 2.1.7 Power Transmission System

Number	Page	Line	Comment
24	2-13	7-28	As stated in the Duke response to RAI 11, the lines that were constructed for the specific purpose of connecting the plant to the transmission system are those lines that run from the Oconee Turbine Building to the 230 kV and 525 kV switchyards.

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**Chapter** 2.0 Description of Nuclear Power Plant and Site and Plant Interaction with the Environment  
**Section** 2.2.2 Water Use

Number	Page	Line	Comment
25	2-15	32-33	Revise line to state: "... provide once-through condenser circulating water (CCW)."
26	2-15	35	<p>The amount of water supplied from the Seneca water treatment plant and used for potable water is 120 m<sup>3</sup>/d [0.03 million gpd].</p> <p>Revise line to state: "... treatment plant (120 m<sup>3</sup>/d [0.3 million gpd]) is used for potable water."</p>
27	2-16	Figure 2-7	The average flow through Keowee Hydroelectric Station is listed as 1632 cfs. The correct value is 1032 cfs.
28	2-16	8-12	<p>Revise to state:</p> <p>"There are a total of seven groundwater wells at the Oconee site. One of these wells is used to supply the site baseball field with drinking water and with water for a restroom facility. This well is also used for seasonal irrigation at the site baseball field and has a pumping capacity of 0.0019m<sup>3</sup>/s (30 gpm). The well at the baseball field is the only groundwater well on site permitted to supply drinking water. There are two groundwater wells used to supply seasonal irrigation for landscaping at a training building and an office complex. The other four wells are used infrequently as low volume, non-potable water sources.</p> <p>The estimated combined pumping rate for all groundwater wells at the Oconee site is less than 0.068 m<sup>3</sup>/s (100 gpm)."</p>

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**Chapter** 2.0 Description of Nuclear Power Plant and Site and Plant Interaction with the Environment  
**Section** 2.2.3 Water Quality Data

Number	Page	Line	Comment
29	2-17	24	Insert "state" in front of agency.
30	2-17	26	The 1998 toxicity issue has been resolved. The sentence referring to this issue should be deleted. Line 26 should be revised to state: "The permit is currently being renewed. A NPDES permit renewal application was submitted by Duke on March 27, 1998. The draft permit will be issued in mid-August for a 30 day public comment period."

**Chapter** 2.0 Description of Nuclear Power Plant and Site and Plant Interaction with the Environment  
**Section** 2.2.4 Air Quality

Number	Page	Line	Comment
31	2-18	18	Add footnote stating: "In May, 1999 the Federal Court of Appeals (D.C. Circuit) remanded EPA's revisions to the ground-level ozone and particulate matter standards. The court held that there was no basis for either revision, and that the revised ozone standard was unconstitutional. Therefore, future implementation of revisions to these standards is uncertain."
32	2-18	23-24	Add Ellicott Rock Wilderness Area and Middle Prong Wilderness Areas.

**Chapter** 2.0 Description of Nuclear Power Plant and Site and Plant Interaction with the Environment  
**Section** 2.2.6 Aquatic Resources

Number	Page	Line	Comment
33	2-19	16	Delete the word "aquatic."

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**Chapter** 2.0 Description of Nuclear Power Plant and Site and Plant Interaction with the Environment  
**Section** 2.2.7 Radiological Impacts

Number	Page	Line	Comment
34	2-23	10	Insert "Hartwell Reservoir" following "Lake Keowee" in the list of aquatic environments.

**Chapter** 2.0 Description of Nuclear Power Plant and Site and Plant Interaction with the Environment  
**Section** 2.2.9.2 Historical and Archaeological Sites at ONS

Number	Page	Line	Comment
35	2-41	7 - 10	The reference to the location of these sites should be deleted to protect these areas from unauthorized excavation. It should be sufficient to mention that two sites exist, southwest of the plant and that these sites are categorized as having nondescript lithic scatter.

**Chapter** 3.0 Environmental Impacts of Refurbishment  
**Section** Table 3-2

Number	Page	Line	Comment
36	3-3	14	This line lists "Public services: public utilities." This appears to be a single issue. 10 CFR Part 51, Subpart A, Table B-1 lists these as two separate issues. This should be corrected by listing these two issues separately.
37	3-3	20	This table lists Environmental Justice as a Category 2 issue related to refurbishment. GEIS Table 9.1 does not list Environmental Justice as a Category 2 issue. The footnote used in GEIS Table 9.1 should be referenced to this issue in Table 3.2.

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**Chapter** 4.0 Environmental Impacts of Operation During the Renewal Term  
**Section** 4.1 Cooling System

Number	Page	Line	Comment
38	4-2	12	The appropriate GEIS reference sections for the issue "Altered thermal stratification of lakes" are sections 4.2.1.2.3 and 4.4.2.2. Line 12 incorrectly lists GEIS Section 4.2.1.2.2 as a reference section. This should be corrected.

**Chapter** 4.0 Environmental Impacts of Operation During the Renewal Term  
**Section** 4.1.1 Entrainment of Fish and Shellfish in Early Life Stages

Number	Page	Line	Comment
39	4-8	2	It is stated that the NPDES permit governs the release of effluents by Oconee Nuclear Station into the receiving waters of "Lake Keowee." The permit also governs discharges that go into Keowee Hydro's tailrace. Therefore it is recommended that the wording be changed to also include "and to the Keowee Hydro Station's tailrace."
40	4-8	4	The 1998 toxicity issue has been resolved. The sentence referring to this issue should be deleted. Line 4 should be revised to state: "The permit is currently being renewed. The draft permit will be issued in mid-August for a 30 day public comment period."

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**Chapter** 4.0 Environmental Impacts of Operation During the Renewal Term  
**Section** 4.1.2 Impingement of Fish and Shellfish

Number	Page	Line	Comment
41	4-9	7	It is stated that the NPDES permit governs the release of effluents by Oconee Nuclear Station into the receiving waters of "Lake Keowee." The permit also governs discharges that go into Keowee Hydro's tailrace. Therefore it is recommended that the wording be changed to also include "and to the Keowee Hydro Station's tailrace."
42	4-10	18	Draft states "Although the 316(b) demonstration was not formally approved...." Duke is not aware of any correspondence indicating that the 316(b) demonstration was not formally approved.  This portion of the sentence should be deleted or the sentence should be revised to state "No correspondence could be located indicating EPA's formal approval of the study. However, the EPA issued a modified NPDES permit on August 30, 1976 that deleted ..."

**Chapter** 4.0 Environmental Impacts of Operation During the Renewal Term  
**Section** 4.1.3 Heat Shock

Number	Page	Line	Comment
43	4-11	37	It is stated that Duke submitted a reapplication in "April" 1998. This should be replaced to state "March, 1998."



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Chapter 4.0 Environmental Impacts of Operation During the Renewal Term  
Section 4.1.4 Microbiological Organisms

Number	Page	Line	Comment
44	4-12	9	<p>10 CFR 51.53(c)(3)(ii)(G) states <math>9 \times 10^{10} \text{ m}^3/\text{year}</math>, not <math>9 \times 10^{12} \text{ m}^3/\text{year}</math> as stated in the document.</p> <p>Revise Line 9 to state: "that is lower than the <math>9 \times 10^{10} \text{ m}^3</math> per year..."</p>
45	4-12	8 – 12	<p>The following revision is suggested:</p> <p>"The combined flow rate for the Keowee and Little Rivers is lower than the <math>9 \times 10^{10} \text{ m}^3/\text{year}</math> (<math>3.15 \times 10^{12} \text{ ft}^3/\text{year}</math>) specified in the 10 CFR 51.53 (c)(3)(ii)(G). This low flowrate raises a concern from the standpoint of the potential for enhancement of thermophylic microorganisms such as <i>Naegleria fowleri</i>. These type of organisms could be a potential health concern for members of the public swimming in the cooling source (Duke 1998a)."</p>

Chapter 4.0 Environmental Impacts of Operation During the Renewal Term  
Section 4.2.2 Electromagnetic Fields – Chronic Effects

Number	Page	Line	Comment
46	4-15	41	<p>The conclusion for GEIS Section 4.5.4.2.3 states:</p> <p>"If NRC finds that a consensus has been reached by appropriate federal health agencies that there are adverse health effects, all license renewal applicants will have to address the health effects in the license renewal process."</p> <p>SEIS Section 4.2.2 states that on this issue "evidence is inconclusive."</p> <p>To ensure closure on this issue, Line 41 should be revised to add:</p> <p>"Therefore, no further review is required for this issue in this SEIS."</p>

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**Chapter** 4.0 Environmental Impacts of Operation During the Renewal Term  
**Section** 4.4.5 Historical and Archeological Resources

Number	Page	Line	Comment
47	4-22	26	<p>Lines 22 through 26 discuss the need to take additional care during normal operation and maintenance activities on site to protect cultural resources. To ensure this protection occurs, Duke has revised the ONS site work practices on land disturbing activities.</p> <p>Revise Line 26 to add: "To ensure that care is taken to protect cultural resources that may be encountered during construction or other land disturbing activities, the ONS site environmental work practices have been revised. If archeological sites are identified during land disturbing activities, land disturbing activities will stop and the State Historic preservation Office will be contacted to determine the appropriate steps to be taken prior to resuming the activities."</p>

**Chapter** 4.0 Environmental Impacts of Operation During the Renewal Term  
**Section** 4.6 Threatened or Endangered Species

Number	Page	Line	Comment
48	4-28	23-31	References to "preliminary" analysis and "preliminary" determination should be changed to final once the USFWS concurs with the NRC staff biological assessment conclusions, if that occurs prior to the issuance of the Final SEIS.
49	4-28	28	Line should be revised to state: "conducting surveys of sensitive habitats prior to initiation of construction activities for new transmission lines."

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**Chapter** 4.0 Environmental Impacts of Operation During the Renewal Term  
**Section** 4.8 Summary of Impacts of Operations During the Renewal Term

Number	Page	Line	Comment
50	4-29	22	The following statement should be added at the end of Line 22: "Therefore, no evaluation of this issue is required."

**Chapter** 4.0 Environmental Impacts of Operation During the Renewal Term  
**Section** 4.9 References

Number	Page	Line	Comment
51	4-29	35	The citation reference "(Should come with RAI)", needs to be clarified.
52	4-30	20	The correct reference is "Letter from M.S. Tuckman..."

**Chapter** 5.0 Environmental Impacts of Postulated Accidents  
**Section** 5.2.3.2 Staff Evaluation

Number	Page	Line	Comment
53	5-13	24	"component cooling water" should be changed to "condenser circulating water"

**Chapter** 6.0 Impacts from the Uranium Fuel Cycle and Solid Waste Management  
**Section** 6.1 The Uranium Fuel Cycle

Number	Page	Line	Comment
54	6-6	18	Reference is made to the Baltimore Gas and Electric (BGE) ER. This Draft SEIS is written for Duke Energy Corporation's Oconee plant. The correct reference is "the Oconee ER."
55	6-6	29	Reference for identification of new and significant information is made to the BGE ER. This Draft SEIS is written for Duke Energy Corporation's Oconee plant. The correct reference is "the Oconee ER."

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**Chapter** 8.0 Alternatives to License Renewal  
**Section** 8.1 No-Action Alternative

<b>Number</b>	<b>Page</b>	<b>Line</b>	<b>Comment</b>
56	8-2	40-43	<p>Water quality on Lake Keowee is affected by many factors other than the factors that Duke has an influence over by the operation of the Duke plants or by the operation of its subsidiaries.</p> <p>Duke is proud to provide corporate and technical assistance to various entities in the region concerned with water quality issues. However, SCDHEC is the state agency responsible for water quality on South Carolina lakes, rivers, and streams.</p> <p>Revise Line 40 to state: “... exceptionally high if Oconee closes. Therefore, the corporate and technical leadership and assistance that Duke voluntarily provides in the area of water quality monitoring may be less readily available.”</p> <p>Delete the sentence beginning:” If water quality begins to decline, ...”</p>

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**Chapter** 8.0 Alternatives to License Renewal  
**Section** 8.2 Alternative Energy Sources

Number	Page	Line	Comment
57	8-4	22	Revise to state "sulfur dioxide emissions ..."
58	8-4	30	Line should be clarified by revising to state: "Approximately 90 percent of the 700,000 tons of ash would be flyash and the remaining 10 percent would be bottom ash."
59	8-4	36	Revise to state: "Facilities would be constructed to control and treat leachate from ash and scrubber waste disposal areas and runoff from coal storage areas."
60	8-5	15	Revise to state: "Total waste volume would be 900,000 MT (1,000,000 tons)/yr. of ash and scrubber sludge."
61	8-7	31	Revise line to state: "However, leachate from ash and scrubber waste disposal areas and runoff from coal storage areas would have to be controlled to avoid groundwater and surface water contamination."
62	8-9	36	Revise to state "approximately 900,000 MT (1,000,000 tons)/yr. of this waste..."
63	8-12	33	The Duke ER supplied information on use of forced draft cooling towers. Duke would not likely use natural draft cooling towers due to the aesthetic difference between natural draft and forced draft cooling towers. Recommend removing the first sentence.

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**Chapter** 8.0 Alternatives to License Renewal  
**Section** 8.2 Alternative Energy Sources (Continued)

Number	Page	Line	Comment
64	8-12	37-38	This line reads as if Catawba has a natural draft cooling tower. Catawba has forced draft cooling towers. Duke would not likely use natural draft cooling towers.
65	8-13	1	Remove first sentence. Duke does not consider natural cooling towers as an option.
66	8-13	29	Add "Addition of 30M (100 ft) tall cooling towers or...."
67	8-15	13	Duke would not likely use natural draft cooling towers due to the aesthetic difference between natural draft and forced draft cooling towers. Remove reference to natural draft cooling towers.
68	8-17	23	Units for waste should be units of volume, not area. Duke estimates the volume for this waste would be "2500 ft <sup>3</sup> /yr of spent catalyst...."
69	8-22	23-26	Duke would not likely use natural draft cooling towers due to the aesthetic difference between natural draft and forced draft cooling towers. Remove this sentence and reference.  Catawba uses forced draft cooling towers.
70	8-23	23	Add statement : "Addition of 30M (100-ft) high mechanical draft cooling towers."

**Chapter** 8.0 Alternatives to License Renewal  
**Section** 8.3 References

Number	Page	Line	Comment
71	8-29	1	The date of the reference is May 13, 1999. The letter is from M. S. Tuckman.

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**Chapter** 9.0 Summary and Conclusions  
**Section** N/A

Number	Page	Line	Comment
72	9-3	25	Add statement: "Therefore, no further analysis of the chronic effects of electromagnetic fields is required."

**Chapter** 9.0 Summary and Conclusions  
**Section** 9.1 Environmental Impacts of the Proposed Action- License Renewal

Number	Page	Line	Comment
73	9-4	13	The fifth word on the line reads 'bonds.' This should be revised to "bounds."

**Chapter** 9.0 Summary and Conclusions  
**Section** 9.3 Staff Conclusions and Recommendations

Number	Page	Line	Comment
74	9-6	16	Wording "preliminary" should be deleted upon release of final document.

**Chapter** Appendix C Chronology of Licensing Correspondence  
**Section** N/A

Number	Page	Line	Comment
75	C-2	5	The date of the reference is May 13, 1999. The letter is from M. S. Tuckman.

**Chapter** Appendix D Organizations Contacted  
**Section** N/A

Number	Page	Line	Comment
76	D-2	11	Should be Asheville, not Charlotte.
77	D-2	13	Should be Charleston, not Columbia.

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Chapter Appendix E Duke Compliance Status and Consultations  
Section Table E-1

Number	Page	Line	Comment
78	E-2	Table E-1	The following permit should be added (Reference ER Table 7.2-1): Agency: SCDHEC Authority: RCRA, Section 3005 Requirement: Permit Permit Number: SCD043979822 Activity Covered: Part A Hazardous Waste Permit, Interim Storage Facility for Mixed Wastes
79	E-2	16	Add footnote to Line 16. Line 16 should state: "being revised" <sup>(a)</sup>  Footnote (a) should be added to end of Table E-1 to state: "A NPDES permit renewal application was submitted by Duke on March 27, 1998. The draft permit will be issued in mid-August for a 30 day public comment period. See Section 2.2.3."
80	E-2	30	"ONS has two permits for drinking water wells in protected area" is not a correct statement. ONS has one drinking water well for the restroom facilities at the Site Softball Field. The permit number for this well is 202098AI. (Note that the Duke ER had supplied the information on the wells. During the review of this draft SEIS, Duke found that the site has only one well permitted as a drinking water well).



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**Chapter** Appendix F- GEIS Environmental Issues Not Applicable to the Oconee Nuclear Station  
**Section** N/A

Number	Page	Line	Comment
81	F-1, F-2	N/A	<p>The GEIS issues related to impacts from refurbishment activities are not listed in this section. There are nine Category 1 issues and nine Category 2 issues that are related to refurbishment activities (Reference Table 3-1 and 3-2). These should be repeated in this table.</p> <p>An alternative to listing these issues in Appendix F would be to change the title to “ <u>Appendix F GEIS Environmental Issues Not Applicable to the Oconee Nuclear Station Because of Plant or Site Characteristics</u>”.</p>
82	F-1	28	<p>The appropriate GEIS reference sections for the issue listed on lines 28 – 30 is 4.8.1.3. Lines 28 – 29 incorrectly list GEIS Sections 4.3.2.1 and 4.4.2.1 as the GEIS sections for this issue.</p>