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SUBJECT: Commens on DES for facility.Dose design objectives of 10CFR50,App I,facility operating plan & operating stds of EPA 40CFR90 provide adequate assurance that potential radiation doses meet current protection stds.

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DEPARTMENT OF HEALTH & HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

Public Health Service

Food and Drug Administration
Rockville MD 20857

SEP 3 1981

Mr. A. Schwencer
Licensing Branch No 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Schwencer:

The Bureau of Radiological Health staff have reviewed the Draft Environmental Statement (DES) for the Washington Public Power Supply System (WPPSS), Nuclear Project No. 2, NUREG-0812, July 1981.

In reviewing the DES, it is recognized that this is an administrative action for issuance of an operating license. DHHS comments were provided on the Draft DES - Construction Phase in September 1972, (Appendix J-108, page C-2) prior to issuance of the construction permit in December 1972. We note that as of May 1981, the construction of Unit 2 was about 85 percent complete. The Bureau of Radiological Health staff have reevaluated the health aspects associated with the proposed operation of the plant and have the following comments to offer:

1. It appears that the dose-design objectives of 10 CFR 50, Appendix I, the operating standards of EPA's 40 CFR 90, and the operating plan of the WPPSS Nuclear Project No. 2 provide adequate assurance that the potential individual and population radiation doses identified meet current radiation protection standards.

2. The environmental pathways identified in Section 5.8.1 and discussed in Chapter V, Section D, of the FES - Construction Phase, pages J-59 - 61, cover all possible emission pathways that could impact on the population in the environs of the facility. The dose computational methodology and models (Appendix C) used in the estimation of radiation doses to individuals near the plant and to populations within 80 km. of the plant have provided the means to calculate a reasonable estimate of the doses resulting from normal operations and accident situations at the facility. Results of these calculations are shown in Appendix L, Tables L.4, L.5, L.6 and L.7, and confirm that the calculated doses meet design objectives.

3. The discussion in Section 5.8.2 on the environmental impact of postulated radiological accidents is considered to be an adequate assessment of the radiation exposure pathways and the dose and health impacts of atmospheric releases. However, we believe the emergency preparedness section is not adequate. We will forego further comment on this aspect, realizing that the process of granting an operating license to the facility will include an adequate review of emergency preparedness (FEMA - NRC Memorandum of Understanding, Regional RAC's, criteria in NUREG - 0654). We have representation on the RAC's whose evaluation relative to the WPPSS will speak for this Agency.

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S/O

The lessons learned from the accident at Three Mile Island - Unit 2 on March 28, 1979, should receive more attention in this DES. It would be helpful if the postulated accidents section could be expanded to include a brief presentation of the critical public health and safety actions that the NRC has taken or plans to take to improve reactor safety and to mitigate the consequences of potential accidents. Such a discussion would provide an important amplification of this section of the DES, and would significantly increase public confidence and understanding of the implementation of the measures that the NRC has undertaken. The discussion at the end of Section 5.8.2.1.4.7, page 5-46, is a possible introduction to the proposed section.

In view of the problems encountered in measuring the releases of radioactive materials at Three Mile Island - Unit 2, we believe the emergency preparedness plan should contain specific information on the adequacy of radiation measuring instruments to be installed to detect radionuclides in a wide range of consequences expected from potential accidents, i.e., stack and containment monitors, and off-site direct radiation measuring devices. We suggest the plan be modified to address in particular the problems of monitoring radiohalogens (especially radioiodines) in the presence of noble gases. This could be accomplished by reference to FEMA-REP-2, a document on instrumentation with considerable input from NRC.

4. The radiological environmental monitoring program, summarized in Table 5.4a and discussed in the FES-CP provides adequate sampling and analysis of environmental media for specific radionuclides to (1) measure the extent of emissions from the plant, and (2) verify that such emissions meet applicable radiation protection standards.

5. Section 5.8.1.5 and Appendix K contain a description of the environmental impact assessment of the uranium fuel cycle. The environmental effects presented are a reasonable assessment of the population dose commitments and the health effects associated with releases of radon-222 from the uranium fuel cycle.

Thank you for the opportunity to review and comment on this draft document.

Sincerely yours,

John C. Villforth
Director
Bureau of Radiological Health