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FACIL:50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397
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CORBYN,E. Environmental Protection Agency
RECIP.NAME RECIPIENT AFFILIATION
Division of Licensing

SUBJECT: Comments on DES re operation of facility.Document should discuss requirements for operator certification,const record,reasons for NRC work stoppages & evidence that reasons for const halts have been rectified.

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REPLY TO ATTN OF: M/S 443

21 SEP 1981

Director, Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Sir/Madame:

The Environmental Protection Agency (EPA) has reviewed the NRC's Draft Environmental Statement Related to the Operation of WPPSS Nuclear Project No. 2. In accordance with our responsibilities under Section 309 of the Clean Air Act, as amended, we have rated this EIS LO-1 (LO - Lack of Objections, 1 - Adequate Information). The basis for this rating is discussed below.

The environmental impacts of the proposed action, based on the information provided in the FEIS-construction phase and the DEIS operation phase, indicate that the project should be capable of operating well within EPA's Environmental Radiation Protection Standards for Nuclear Power Operations and should meet all applicable water quality standards.

We believe that the quality of the EIS could be improved, however, in two ways. First, the DEIS asserts that the delays in plant construction were in response to a slowdown in growth of electricity demand during the 1970's (page 2-1). This assertion overlooks the fact that the NRC put a halt to construction on the project for two years due to poor construction practices and bad record keeping. From a NEPA "full disclosure" standpoint, it would benefit the reader to have a synopsis of WPPSS construction record, reasons for NRC's work stoppages and, as assurance that an operating license is warranted, evidence that the causes for NRC's construction halts have been rectified and evidence that these construction problems will not magnify the potential environmental consequences of reactor operation.

Second, the DEIS does not discuss requirements for operator certification. This would seem to be as critical to safe and proper operation as the soundness of the reactor itself, including its various safety backup systems.

Thank you for the opportunity to review the DEIS. If you have any questions pertaining to our comments please contact Bill Riley, of my staff, at (FTS) 399-1285.

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Sincerely yours,

Elizabeth Corbyn

Elizabeth Corbyn, Chief
Environmental Evaluation Branch

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