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SUBJECT: Comments on NUREG-0812, DES for facility.

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Washington Public Power Supply System

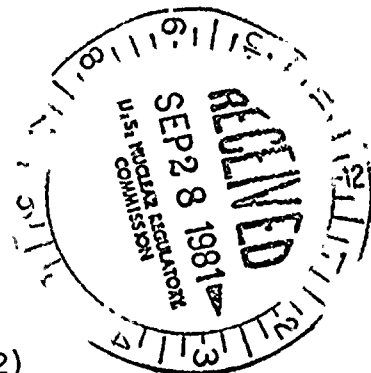
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September 23, 1981

GO-2-81-309

Docket No. 50-397

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



Dear Mr. Schwencer:

Subject: WPPSS Nuclear Project No. 2
Draft Environmental Statement (NUREG-0812)

Reference: Ltr., A. Schwencer, NRC, to R. L. Ferguson, WPPSS,
same subject, dated August 7, 1981

We have reviewed the subject document and offer the following comments which you may wish to consider in the preparation of a Final Environmental Statement.

Introduction (Page 1-1)

It would be more accurate to reword the first paragraph as follows: "The proposed action is ... to the Washington Public Power Supply System (WPPSS), a municipal corporation and joint operating agency of the State of Washington, for startup and ..." Also the maximum design power level (third paragraph) is 3468 MWt as opposed to 3458 MWt noted in the FES-CP (see also FSAR Sec. 1.1.7).

Water Use (Sections 4.2.2.1, 4.3.2.2, 5.3.1, and 5.3.5)

The current situation with respect to the local groundwater supply is that there are three wells onsite; two are completed to the unconfined aquifer and the third well draws from the deeper confined aquifer. One of the two shallow wells periodically provides water for dust suppression and the other is not used. The deep well provides water for construction, fire suppression, and drinking. A filter system is presently being installed on the river makeup water system and, when completed, potable water will be obtained from the river. During operation, normal water supply will be from the river and the deep well will be maintained as a standby source; the two shallow wells will not be used. With respect to monitoring, the Supply System believes sampling and analysis of well water, if it is used, will detect contamination and verify conformance with applicable drinking water standards. The frequency of monitoring should be related to usage; as noted above, the two shallow wells will not be used and the deeper well will be used very infrequently.

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Threatened Species (Sections 4.3.4.3 and 5.5.1.2)

A survey of threatened species in the Hanford Reach was performed in 1980 D.H. Fickeisen, R. E. Fitzner, R. H. Sauer, J. L. Warren, Wildlife Usage, Threatened and Endangered Species, and Habitat Studies of the Hanford Reach, Columbia River, Washington, Prepared for U. S. Army Corps of Engineers by Battelle Pacific Northwest Laboratories, Richland, Washington 1980). Allium robinsonii was generally found on silty and usually stoneless soil 20 - 30 feet from the river. Studies performed 1975 - 1980 have not documented the presence of the species in the vicinity of WNP-2 (Preoperational Terrestrial Monitoring Studies Near WNP-1, -2, and -4, May through December 1980, Beak Consultants, Inc., Portland, Oregon, January 1981).

Historic and Archeological Sites (Section 4.3.5)

The last property listed in Table 4.4, the Polson House, is in Grays Harbor County not Franklin County.

Corrosion Products (Section 4.2.4.2 and 5.3.4.3)

We believe the Section 5.3.4.3 considerably overestimates the in-river, after mixing concentration of copper, especially when compared to the blowdown concentrations of total copper cited in Section 4.2.4.2.

Cooling Tower Drift (Sections 5.4.2, 5.5.1.1, 5.5.3.1)

The DES correctly notes that the Supply System is very conservative in its estimates of cooling tower drift (e.g., assumed drift rate of 0.05%). Notwithstanding this conservatism and low probability of quantifiable impacts (DES, P. 5-8), the Supply System intends to conduct a soil chemistry and vegetation analysis program at least during the initial phase of cooling system operation (ER-OL Section 6.1.4.1). The Supply System's previously stated intention of using aerial photography to assess drift effects was deleted by Amendment 5 (July 1981) to the ER-OL. The reason for deleting this approach is that aerial photographs taken to date are not useful to differentiate plant community characteristics. Specific problems are that individual plant species cannot always be distinguished and changes in productivity cannot be assessed because of the great amount of standing dead material near WNP-2 and the relatively low growth form of the dominant species. The Energy Facility Site Evaluation Council (EFSEC) concurred with this program change (ER-OL Ref. 6.1-53).

Meteorological Monitoring (Section 5.4.3)

We should note that the WNP-2 meteorological measurement system is not inactive; it was reactivated on October 1, 1979 to support WNP-1 and remains operating in support of the Fast Flux Test Facility (FFTF).

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Radiological Impacts (Section 5.8 and supporting appendices)

While individual and general population dose commitments resulting from the operation of WNP-2 will indeed be very small (DES P. 5-23 and L-2), we believe the DES may overestimate the doses. We note, for instance, that the atmospheric dilution factors are an order of magnitude greater than the Supply System's estimates without explanation. We should also note that site restricted area boundary is described in ER-OL Section 2.1.1.3 and FSAR Section 2.1.1.3. This boundary is not the same as the exclusion area boundary (1950 meter radius) and the DES may be confusing in regard to these definitions (e.g., DES P. 5-35). With respect to Section 5.8.1.4.1, the Supply System has established 32 dosimetry stations: one ring of 16 at the exclusion area boundary, 7 at 4-6 miles in sectors across the Columbia River in Franklin County, and 9 in special interest areas. These, combined with the extensive network maintained by Battelle Northwest Laboratories for DOE, should fulfill the plant requirements. In Table 5.7, reference to Appendix "H" should instead be to "D". The transfer of information from Figure 5.7 to Table 5.9 is not clear and, in particular, the 1,920/21,000 cancers for a probability of 10^{-7} seems in error.

Socioeconomic Benefits and Costs (Sections 2.2, 5.7, and Chapter 6)

A general, and perhaps obvious, comment is that numbers on both sides of the benefit/cost ledger have increased since the Supply System applied for an operating license or last responded to NRC questions on the subject. These increases would not, however, alter the relevant conclusions.

We have appreciated the opportunity to comment on this Draft Environmental Statement.

Very truly yours,



G. D. Bouchey
Director, Nuclear Safety

cc

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