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SUBJECT: Comments on DES for facilities. Rio Salado should be investigated as potential source of cooling water. Onsite storage & ultimate disposition of radwaste not adequately addressed.

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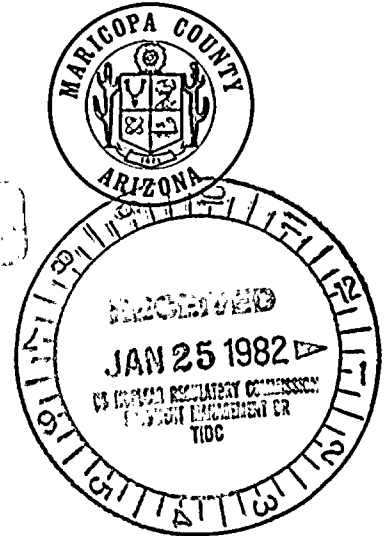
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MARICOPA COUNTY DEPARTMENT OF PLANNING AND DEVELOPMENT

111 S. 3rd. Avenue, Room 300, Phoenix, Arizona 85003 -- Phone (602) 262-3201

January 19, 1982

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PDR ADDCK 05000528
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Frank J. Miraglia, Chief
Licensing Branch No. 3
Division of Licensing
United States Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Miraglia:

We are in receipt of the Draft Environmental Statement for the operation of Palo Verde Nuclear Generating Station (Docket STN 50-528-529-530). Our staff has had the opportunity to review the statement and we encourage further investigation of the following areas:

1) The Rio Salado as a potential water source

The Rio Salado Development District located at 141 East Palm Lane, Suite 202, in Phoenix, Arizona 85004 is a potential source of cooling water. The District, which covers 40 miles of floodplain between the Granite Reef Dam and the confluence of the Gila and Agua Fria Rivers, hopes to control water as it flows through the Salt River. This is a potential source of cooling water which should be fully investigated.

2) The ultimate disposition of radioactive wastes

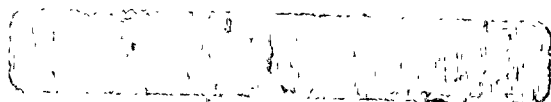
The onsite storage and ultimate disposition of radioactive materials are not adequately addressed in the report. The State of Arizona is presently struggling with the issue of hazardous waste disposal. Radioactive waste disposal is among the issues that are not resolved. If the plant begins operation before an acceptable disposal site for radioactive wastes can be found, then provisions must be made for the long term on-site storage of radioactive wastes.

The report states that all radioactive wastes will be solid and will be ultimately shipped off-site annually to a licensed burial site. Where is the site?

3) Control over neighboring properties

The Palo Verde site is a growth generator which attracts new growth and development. While over 1,500 acres of land have been acquired for the Power Station site most of that land is

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south of the generating facilities. Privately owned and controlled lands are found approximately 3,800 feet north of reactor #1. It is recommended that the project site boundary be expanded to the north and at least one mile in all directions from the reactor. It also is recommended that the development rights of neighboring properties be acquired to assure compatible land uses.

4) Comprehensive Ongoing Inspections

Most large public utilities, including Arizona Public Service, rely extensively on contractors for the construction of their major facilities. Recent developments such as Diablo Canyon in California and the APS natural gas leak in Arizona suggest that as much attention must be given to construction and maintenance as well as to the planning and design of the project.

A careful pre-operation inspection process coupled with a continuing program of structural and environmental monitoring is necessary to protect the public. With sizeable government cutbacks on the horizon, many people are concerned about the government's ability to conduct thorough inspections of the work performed by private contractors.

I am available to discuss these comments with you.

Sincerely,

DON E. McDANIEL, JR., DIRECTOR
DEPARTMENT OF PLANNING AND DEVELOPMENT



Dudley Onderdonk
Principal Planner
Advance Planning Division

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