

PUBLIC SERVICE COMPANY OF OKLAHOMA
A CENTRAL AND SOUTH WEST COMPANY

P.O. BOX 201 / TULSA, OKLAHOMA 74102 / (918) 583-3611



Public Service Company of Oklahoma
Black Fox Station
Final Environmental Statement Methods
of Compliance for Black Fox Station

July 11, 1979
File 6212.125.2000.32N

Environmental Projects Branch
Division of Site Safety & Environmental Analysis
Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Mr. W. H. Regan, Acting Assistant Director

Gentlemen:

On July 26, 1978, Public Service Company of Oklahoma was issued a Limited Work Authorization for our Black Fox Station. The LWA issuance is subject to numerous environmental conditions set out primarily in the Final Environmental Statement for our station. In order to assure total compliance to these conditions, Public Service has developed a comprehensive Construction Environmental Impact Control Program which is implemented by project procedures and is available by management.

On September 25 and 26, 1978, an inspection team from NRC Region IV Inspection and Enforcement audited our station environmental impact control procedures and visited the station site. In their course of inspection, all areas of audit were in compliance--but two items were identified for more study as to the interpretation for method of compliance (Attached NRC letter of audit findings dated October 17, 1978). Since receipt of the NRC audit findings, this matter was discussed between the NRC staff and the NRC Region IV office and consequently by both NRC offices with PSO. These informal telephone communications served to keep the two NRC offices apprised of our activities and methodologies of compliance over the past few months. As a matter of complete documentation, as opposed to any submittal of new information, two items are discussed herein along with a description of our method of compliance.

Hydrological Monitoring Program (FES Sec. 6.1.3)

"The applicant shall establish a new sampling station, 2a, to be maintained and sampled contemporaneously with Station 2 for the duration of construction of the barge slip, intake and discharge structures."

The hydrological monitoring system in reference was initiated by Public Service Company in February 1974 and completed in January, 1975 (ER Sec. 6.1.1) to provide

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CENTRAL AND SOUTH WEST SYSTEM

Central Power and Light
Corpus Christi, Texas

Public Service Company of Oklahoma
Tulsa, Oklahoma

Southwestern Electric Power
Shreveport, Louisiana

West Texas Utilities
Arlene, Texas

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BLACK FOX STATION SERVICE LIST

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ATTACHMENT 1



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

October 17, 1978

Y 6212 DIN 8-013-133
6212.125-1000.21L
6212.217.0513.53L

In Reply Refer To:

RIV

Docket Nos. STN 50-556 Rpt. 78-04
STN 50-557 Rpt. 78-04

RECEIVED AND FILED

OCT 20 1978

PROJECT
DOCUMENT CONTROL

COPIES TO:

MEE

Public Service Company of Oklahoma

TNE

ATTN: Mr. T. N. Ewing, Director

GWM

Black Fox Station Nuclear Project

RJK

Post Office Box 201

JBP

Tulsa, Oklahoma 74102

VLC

Gentlemen:

HHE

JLH

SAB

RDE

This refers to the inspection conducted by Mr. R. J. Everett and Mr. H. C. Harrison during the period September 25-26, 1978, of activities authorized by NRC Limited Work Authorization dated July 26, 1978, for the Black Fox Project Units No. 1 and 2, and to the discussion of our findings with Messrs. M. E. Fate, T. N. Ewing, and other members of your staff at the conclusion of the inspection.

Areas examined during the inspection and our findings are discussed in the enclosed inspection report. Within these areas, the inspection consisted of selective examination of procedures and representative records, interviews with personnel, and observations by the inspector.

Within the scope of the inspection, no items of noncompliance were identified.

Two unresolved items are identified in paragraph 5 of the enclosed report.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosed inspection report will be placed in the NRC's Public Document Room. If the report contains any information that you believe to be proprietary, it is necessary that you submit a written application to this office, within 20 days of the date of this letter, requesting that such information be withheld from public disclosure. The application must include a full statement of the reasons why it is claimed that the information is proprietary. The application should be prepared so that any proprietary information identified is contained in an enclosure to the application, since the application without the enclosure will also be placed in the Public Document Room. If we do not hear from you in this regard within the specified period, the report will be placed in the Public Document Room.

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Public Service Company
of Oklahoma

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October 17, 1978

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,



W. C. Seidle, Chief
Reactor Construction and
Engineering Support Branch

Enclosures:

IE Inspection Report Nos. 50-556/78-04
50-557/78-04

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U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION IV

IE Inspection Report Nos. STN 50-556/78-04
STN 50-557/78-04

Licensee: Public Service Company of Oklahoma (PSO)
P. O. Box 201
Tulsa, Oklahoma 74102

Facility: Black Fox Units 1 and 2 (BFS)

Inspection conducted: September 25-26, 1978

Inspectors: *R. J. Everett*
R. J. Everett, Radiation Specialist

10/17/78
Date

Accompanied by: *Harri C. Harrison*
H. C. Harrison, Radiation Specialist

10-17-78
Date

Reviewed by: *Glen D. Brown*
Glen D. Brown, Chief, Fuel Facility and
Material Safety Branch

10/17/78
Date

Inspection Summary

Inspection on September 25-26, 1978 (Report Nos. STN 50-556/78-04 and STN 50-557/78-04)

Areas Inspected: Initial, announced inspection of construction phase environmental protection programs, including organization and administration; plans and procedures; implementation of environmental control program; environmental monitoring; and a tour of the site and surrounding area. The inspection involved 28 inspector-hours by two NRC inspectors.

Results: Of the five areas inspected, no items of noncompliance were identified.

DETAILS

1. Persons Contacted

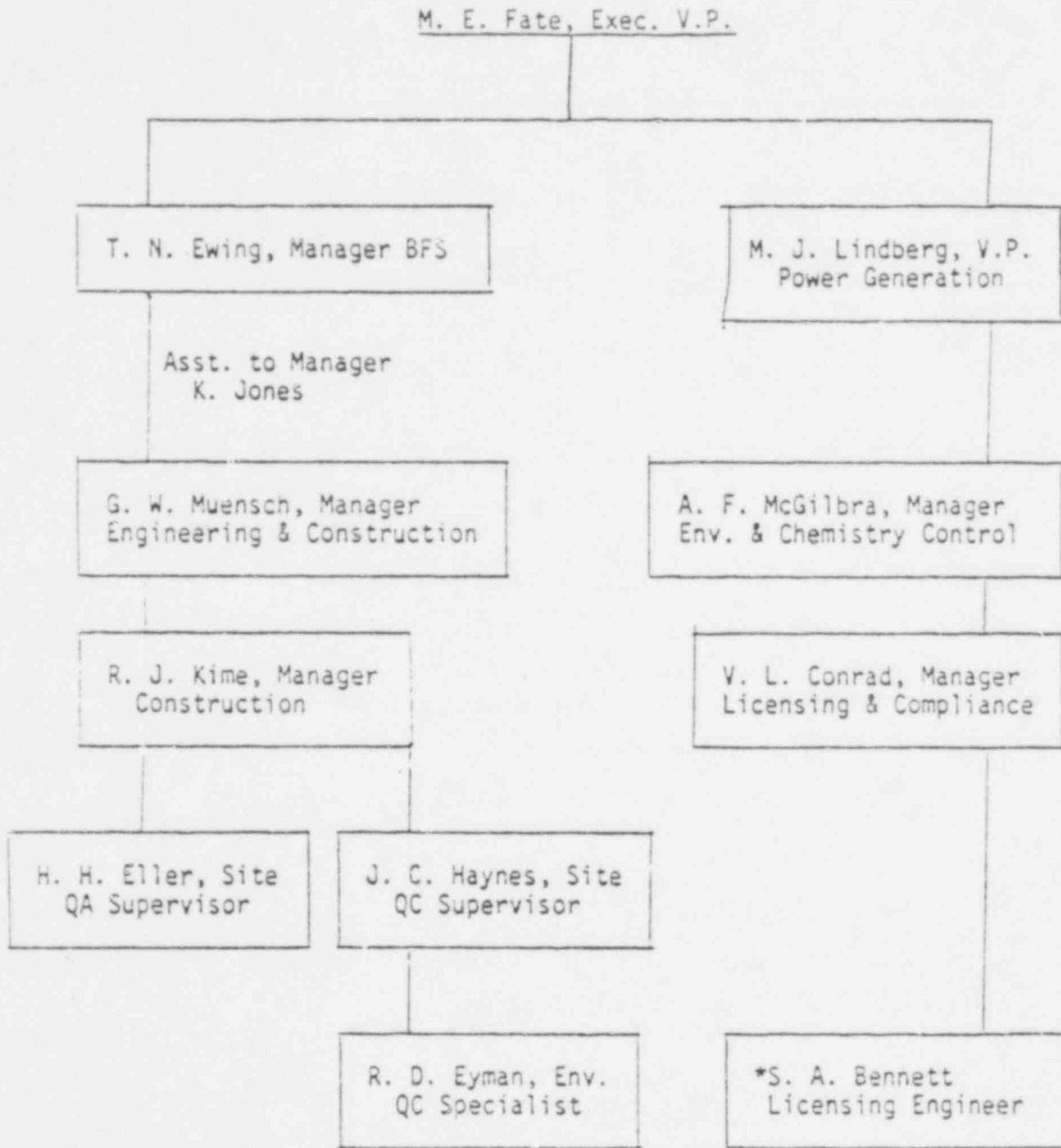
Public Service Company of Oklahoma

- *M. E. Fate, Executive Vice President
- *T. N. Ewing, Manager, BFS Nuclear Project
- *V. L. Conrad, Manager, Licensing and Compliance
 - J. L. Haynes, Site QC Supervisor
 - H. H. Eller, Site QA Supervisor
- *S. A. Bennett, Licensing Engineer
- R. D. Eyman, Environmental QC Specialist
- *J. B. Perez, Manager, Quality Assurance

*Present at exit meeting on September 26, 1978

2. Organization and Administration

The inspector inquired as to the organizational structure that had been established to carry out the environmental control programs during the construction phase. The following chart shows the present structure and assigned individuals as indicated by BFS personnel.



*Lead responsibility for the ECP.

3. Environmental Control Program (ECP) and Procedures

The inspector reviewed the written program and procedures that relate to the Environmental Protection Control Program. The documents are as follows:

Copy No. 8 - "Construction Environmental Impact Control Program for Black Fox Station Construction"

Project Procedure Manual - Procedure No. 15.04 - "Construction Environmental Impact Control Program Implementation"

Field Project Procedure Manual - FPPM 4.9 - "Site Construction Environmental Impact Control"

After review of these documents and a discussion of the program with the applicant, the inspector determined that the environmental control program was sufficiently documented and assignments of responsibility have been made. Further, the program called for site inspection and audits by the corporate staff and procedures established to find and correct items of potential environmental impact. The inspector had no further questions at that time.

4. Implementation of the ECP

The inspector discussed the implementation of the ECP and examined selected records. Monthly reports from the Site Environmental QC Engineer were reviewed for June, July, and August of 1978. The monthly report contained checklists for each legal requirement listed in the LWA to provide protection from environmental impacts during construction. The reports also contained status information on each item of noncompliance cited during the report period. The inspector had no further questions at that time.

The inspector reviewed the document AA-1 "BFS Socioeconomic Impact Assessment Program." The applicant described his preliminary contacts with local governments and state planning agencies in order to implement the program. The inspector stated that the program content and the initial contacts that have been made to implement the program were sufficient to comply with section "f" of the LWA.

5. Environmental Monitoring

The applicant's environmental monitoring programs are described in section 6.1 of the FES. The following gives the status of each monitoring program:

- a) Thermal - temperature studies in the Verdigris River have been completed. No additional information is required.
- b) Radiological - Baseline studies have been completed. Applicant will initiate Preoperational Program no later than two years prior to the operating license.
- c) Hydrological - The applicant has developed a program to assess the physical, chemical and geological parameters of the site area surface waters. This program is discussed in detail in section 6.1.1 of the ER. The applicant considers the program completed with exception of two stations in the river which are sampled for physical and chemical parameters. The inspector stated that the requirement in section 6.1.3 of the FES calls for an expanded program to include the above two stations. This would imply that the applicant should continue the detailed program and add the two stations in question. The inspector stated that this issue would remain unresolved pending discussions with the NRC staff.
- d) Meteorological - Site meteorological data was taken using the 330 foot tower in 1973-1974. The applicant plans to take no other meteorological measurements during the construction phase.
- e) Ecological
 - 1. Terrestrial - Baseline surveys have been completed. No construction or preoperational monitoring programs are required. Section 6.1.5.1 of the FES requires an inspection program for erosion in the draw between the central station complex and the wastewater holding pond. The applicant stated that this program would be implemented or the draw would be concreted on each side to prevent erosion.
 - 2. Aquatic - The applicant's program was carried out according to table 6.1-1 of the ER. The program has been completed and no further preoperational monitoring is required.

The applicant stated that no monitoring programs or special studies are being conducted by contractors and PSO Programs are essentially complete.

The applicant described the training provided by an ecology consultant on March 8-9, 1978. Construction personnel were given ecological training so that they can become aware of and avoid ecological impacts during construction. Section 4.5.2.1 of the FES requires specifically trained personnel

to recognize and protect ecologically sensitive areas. Item 12.b of the LWA exempts right of way (ROW) monitoring for ecological impact which appears to conflict with the requirements stated in section 4.5.2.1.6. The latter reference calls for ecological inspections by a qualified individual of all completed areas. The inspector stated that this issue would be considered unresolved pending discussions with the NRC staff.

6. Site Tour

The inspector toured the site and surrounding area during the inspection to observe the condition of the site with regard to environmental impacts and to observe the implementation of the applicant's environmental control program. The inspector noted two areas needing attention and corrective action. A small oil spill was noted at the discharge structure cofferdam and fire damage was found in the protected cemetery plot south of the station complex. The cemetery is fenced but not locked. The fire consumed a few square meters of grass and brush. The applicant stated that these incidents would be investigated and appropriate action taken to protect these areas.

The applicant stated that all known oil and gas wells have now been plugged. The inspector reviewed certificates of plugging prepared by a state agency.

The inspector inquired as to work on transmission line right of way (ROW). The applicant described the planned ROWs, which are described in section 3.9 of the ER, and stated that a separate environmental impact procedure would be written in the future to cover this activity. No construction work on ROW is planned for at least two years. The inspector had no further questions at that time.

7. Unresolved Items

Unresolved items are matters which require additional information in order to determine if they are acceptable items, items of noncompliance, or deviations. Two unresolved items were identified during the inspection. These items are discussed in paragraph 5.

8. Management Meeting

The inspector met with PSO representatives at the corporate offices in Tulsa on September 25, 1978 (See paragraph 1). The inspector discussed the NRC environmental inspection program and the regulatory requirements for environmental protection in the LWA.

9. Exit Interview

The inspector met with PSO representatives at the corporate offices in Tulsa on September 26, 1978 (See paragraph 1). The inspector summarized the purpose and scope of the inspection, and discussed the findings.

ATTACHMENT 2

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1 disturbed?

2 A Not on the cost-benefit, no.

3 Q Now I'd like to turn for a second to the answers
4 to Board Questions 8 and 9.

5 Turning first to Board Question 8: It's a
6 fact, is it not, that grading as a method of removing access
7 roads presents a not unacceptable impact so far as the Staff
8 is concerned?

9 A Yes, that's true. I did not say I would not
10 accept grading as a mitigation measure.

11 Q And that is what the applicant proposes, is it
12 not?

13 A Yes, it is.

14 Q Now turning to Board Question 9 for just one
15 second, and if you might also turn to page 4-7 of the Final
16 Environmental Statement, in the second full paragraph on
17 page 4-7 of the Final Environmental Statement there are four
18 sections of the proposed right-of-way which the Staff
19 originally proposed would require inspection by a qualified
20 biologist; is that correct?

21 A Yes, that's correct.

22 Q And just reading them into the record these are
23 XI-D, XI-E, XII-A and XII-B.

24 Now, then, do you know whether or not the con-
25 struction of transmission lines in Sections XI-D and XI-E

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are still proposed by the applicant as a part of -- or as associated with the construction of the Black Fox Station?

A I believe the applicant has indicated those lines would be built whether or not Black Fox Station is built.

Q All right, sir.

Were those two sections the areas of primary interest to the Staff with respect to a qualified biologist?

A Those are the ones for which we have documented evidence for which a qualified biologist -- on which to base the requirement.

Q All right, sir.

What about those other two sections, XII-A and XII-B?

A The Staff reasoned that those sections, based on all the information we had, could potentially contain similar unique habitats.

Q You have no present evidence that they do in fact?

A There is no concrete evidence that there are any unique habitats in that region.

Q All right, sir.

~~Do you believe that there is now any requirement~~
as far as the NRC Staff is concerned that the applicant
have a qualified biologist when clearing those proposed

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wb7

transmission routes?

A No, we're willing to withdraw the requirement.

Q Dr. Hong, turning to your prepared testimony, sir, on the second page there is a statement in the second paragraph on that page that after the conclusion of the construction of the Northeastern Station about 140 operating crews will be employed.

Could you tell us, please, how many persons constitute a crew? Or did you mean to say there would be 140 individuals?

A (Witness Hong) Would you repeat the question, please?

Q It's the second sentence in the second paragraph on page 2 of your prepared testimony. There's the statement that about 140 operating--

A Will you indicate the lines?

Q I'd be glad to do it, sir.

It's the fifth line.

A The fifth line from the top on the second page?

Q The second paragraph on the second page.

A Okay.

Q Do you see the reference to 140 operating crews, sir?

A Right.

Q My question is: Do operating crews -- does that

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