



**Wisconsin Electric** POWER COMPANY  
231 WEST MICHIGAN, MILWAUKEE, WISCONSIN 53201



March 8, 1976

Mr. Benard C. Rusche, Director  
Office of Nuclear Reactor Regulation  
U. S. NUCLEAR REGULATORY COMMISSION  
Washington, D. C. 20555

Dear Mr. Rusche:

ALTERNATIVE AND FUTURE SITES  
WISCONSIN UTILITIES PROJECT  
DOCKETS STN 50-502 THROUGH 50-507

On August 15, 1975, Wisconsin Electric Power Company, Wisconsin Power and Light Company, Wisconsin Public Service Corporation, and Madison Gas and Electric Company (Applicants) submitted Site Addenda and Environmental Reports for the Wood and Haven sites. These documents were submitted in response to, and in accordance with, Mr. Giambusso's letter and attachments thereto dated August 24, 1974, which requested general siting information on potential future sites. The submittals also were made in the context of the Commission's announcement on March 11, 1974 of its intended policy for early site reviews.

Mr. Boyd's letter to the Applicants dated January 9, 1976, transmitted requests for additional information for the Wood and Haven Environmental Reports and Site Addenda. These requests for additional information extend well beyond the requirements indicated in Mr. Giambusso's letter and in the March 11, 1974 policy announcement. They are acknowledged to be based on current regulatory guidance and regulations for construction permit application review.

The major benefit of an early site review for a potential applicant, for the NRC, and for the public is to determine whether significant safety or environmental concerns may exist which could preclude the future use of a site for construction of a nuclear plant. This early site review unavoidably must be based on major safety and environmental aspects of the site, assuming a hypothetical or standard nuclear plant with specified source terms is to be constructed on the site at some future time.

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ENCLOSURE 3

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In the absence of specific Nuclear Regulatory Commission guidance for early site review, the Applicants in this instance formulated general guidelines based on our understanding of the Commission's intent. As an example, our guidance assumes an early site review can be conducted in the absence of specific schedule dates for construction and operation, detailed cost-benefit studies, and justification of the need for power. Further, we believe the concept of early site review does not require detailed environmental and geotechnical studies beyond those necessary to define adequately major site characteristics. For example, Question 340.1 attached to Mr. Boyd's January 9 letter states that Section 1 of the Environmental Report is deficient in that it does not presently demonstrate the need for 1800 MW of electric power generation. Obviously for early site review where no construction schedule has been established it is not possible to complete Section 1 in the detail required for a Construction Permit Application. Similarly, Questions AR 324.8 through AR 324.13 refer to specific design details of man-made dikes and slopes.

It is apparent from Mr. Boyd's letter of January 9, and the enclosures thereto, that the Wood and Haven Environmental Reports and Site Addenda submitted for early site review by the Nuclear Regulatory Commission have actually been reviewed in accordance with Construction Permit information requirements, and even in accordance with guidelines beyond those in effect at the time that Koshkonong was docketed. We have been required to expend in excess of \$25 million in support of the Koshkonong Nuclear Plant applications before federal and state agencies to date, and we have not yet begun the required public hearings necessary prior to the issuance of construction authorizations. We believe that it is not the Commission's intent that potential applicants for nuclear power plants should be required to invest millions of dollars in detailed studies to obtain an indication from the Commission that a particular site has potential for future nuclear plant construction. To require Construction Permit detail in the early site review step, in our opinion, defeats the purpose and intent of the early site review.

We now estimate that additional expenditures in excess of \$1 million would be required to provide the additional information requested by the NRC staff for the Wood and Haven reviews. We are currently evaluating whether it would be prudent to commit these substantial sums of money in the absence of any indication by the staff that either, or both, of these sites have some future potential. We are also evaluating the desirability of attempting to respond to requests for additional information in the absence of specific Commission guidelines for early site review. Accordingly, we are presently unable to provide you with a schedule for our response to Mr. Boyd's letter of January 9.

*Enclosure 3*

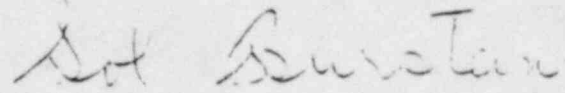
Mr. Benard C. Rusche

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We believe that it would be to our mutual interest to review this matter with you. Accordingly, we would be pleased to meet with you and members of your staff to discuss our present submittal, the staff request for additional information, and guidelines appropriate for early nuclear plant site reviews.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Sol Burstein".

Executive Vice President

Sol Burstein

ENCLOSURE 3