

TEXAS UTILITIES GENERATING COMPANY

2001 BRYAN TOWER - DALLAS, TEXAS 75201

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R. J. GARY
EXECUTIVE VICE PRESIDENT
AND GENERAL MANAGER

July 13, 1981

Mr. Darrell G. Eisenhut
Director, Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
DOCKET NOS. 50-445 AND 50-446
APPLICANTS COMMENTS ON DRAFT
ENVIRONMENTAL STATEMENT

Dear Mr. Eisenhut:

We have reviewed the Draft Environmental Statement (DES) related to the operation of Comanche Peak Steam Electric Station (CPSES) dated May, 1981. Our opinion is that this statement is a reasonable evaluation of the environmental impact of the operation of CPSES. We offer the comments below which we believe should be considered in the preparation of the Final Environmental Statement.

COMMENTS

1. On page vi of the DES item 9.C. states "The applicant shall be required to restrict the use of ground water for CPSES operation to that amount needed for potable and sanitary purposes and for supplementing the supply of treated surface water during short periods of peak demand when the station requirements exceed the capacity of the reverse-osmosis-surface-water-treatment plant." We agree with this requirement but propose the changed wording below to expressly address the situation of routine or unplanned outage of the reverse-osmosis-surface-water treatment plant. The new wording should be: "The applicant shall be required to restrict the use of groundwater for CPSES operation to that amount needed for potable and sanitary purposes and for supplementing the supply of treated surface water during short periods when the station requirements exceed the capacity of the reverse-osmosis-surface-water-treatment plant because of peak demand or treatment plant outage.
2. On page 4-9 of the DES it states that the disposal method for potassium chromate is offsite disposal. It should be noted that the CPSES design also permits disposal to the evaporation ponds.
3. On page 4-18 of the DES it states that "The applicant will monitor the aquatic biota and selected other resource of SCR once the

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station is in operation (ER-OL, Amendment 1, response to staff question 65)." The response to question 65 says: "There are no plans on the part of the applicant at this time to monitor and manage the aquatic resources of Squaw Creek Reservoir. The right and responsibility for this function is the sole jurisdiction of the State of Texas. In the event that the Texas Parks and Wildlife Department elects to delegate the authority for reservoir management to the Applicant, a suitable program will be developed for review by the appropriate agencies." The applicant has not received any indication from the State of Texas that it intends to delegate this authority. We therefore have no plans to monitor aquatic biota in SCR.

4. Section 5.8.1.2 projects occupational doses at CPSES as much as 1300 person-rem/yr per unit averaged over the life of the station. We question the appropriateness of such a large dose for the following reasons:
 - a. It is based on a unique circumstance, causing a three times larger than average dose, (steam generator replacement) for which CPSES is designed to avoid.
 - b. It assigns this type of event to both units 1 and 2. CPSES units 1 and 2 do not have identical steam generators.
 - c. The resultant health effects estimates are unrealistically large because very conservative risk estimators (1972 BEIR report) are multiplied by an unrealistic dose.

Again, the above comments are offered for consideration in the preparation of the Final Environmental Statement. Overall we believe that the DES is a reasonable assessment of the environmental effects of the operation of CPSES.

Sincerely,

R. J. Gary
R. J. Gary

RJG:grr