



DEPARTMENT OF HEALTH & HUMAN SERVICES

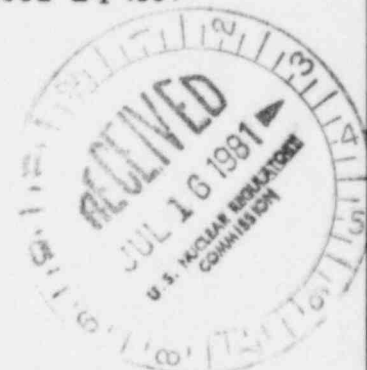
Food and Drug Administration

Public Health Service

Food and Drug Administration  
Rockville MD 20857

JUL 14 1981

Mr. B. J. Youngblood, Chief  
Licensing Branch No. 1  
Division of Licensing - NRR  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555



Dear Mr. Youngblood:

Staff of the Bureau of Radiological Health of the Food and Drug Administration have reviewed the health aspects of the Draft Environmental Statement (DES) for the Comanche Peak Steam Electric Station, Units 1 and 2, NUREG-0775, May 1981.

In reviewing the DES related to the operation of the Comanche Peak facility, it is recognized that this is an administrative action for the issuance of an operating license. DHHS comments were provided on the Draft DES - Construction Phase, in April 1974, (Appendix D-4-5, pages C191-192), prior to issuance of the construction permit in December 1974. We note that as of December 30, 1980, the construction of Comanche Peak, Unit 1, was 87 percent complete, and Unit 2 was about 50 percent complete. Thus, Bureau of Radiological Health staff have re-evaluated the health aspects associated with proposed operation of the plant, and have the following comments to offer:

1. It appears that the design objectives of 10 CFR 50, Appendix I, and the proposed operating plan of the Comanche Peak facility provide adequate assurance that the potential individual and population radiation doses meet current radiation protection standards.

2. The environmental pathways identified in Section 5.8.1 and discussed in Appendix C of the FES - Construction Phase, pages C-101-105, give all possible emission pathways that could impact on the population in the environs of the facility. The dose computational methodology and models used in the estimation of radiation doses to individuals near the plant and to populations within 80 km. of the plant have provided the means to calculate a reasonable estimate of the doses resulting from normal operations and accident situations at the facility. Results of these calculations are shown in Tables 5.9, 5.10, 5.11, and 5.12 and confirm the above assessment.

We note that the annual dose commitment to the thyroid of a child through milk ingestion from the nearest dairy herd is expected to be 0.21 mrem per year per unit. This dose has been revised downward from the estimate of 4.4 mrem per year, as reflected in our comments on page C-191.

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3. The discussion in Section 5.8.2 on the environmental impact of postulated radiological accidents is considered to be an adequate assessment of the radiation exposure pathways and the dose and health impacts of atmospheric releases. However, we believe the emergency preparedness section is not adequate. We will forego further comment on this aspect, realizing that the process of granting an operating license to the facility will include an adequate review of emergency preparedness (FEMA-NRC Memorandum of Understanding, Regional RAC's, criteria in NUREG 0654). We have representation on the RAC's whose evaluation of the emergency planning relevant to Comanche Peak will speak for this agency.

The lessons learned from the accident at Three Mile Island - Unit 2, on March 28, 1979, should receive more attention in this DES. It would be helpful if the accident section could be expanded to include a brief presentation of the critical public health and safety actions that the NRC has taken or plans to take to improve reactor safety and to mitigate the consequences of potential accidents. Such a discussion would provide an important amplification of this section of the DES, and would significantly increase public confidence and understanding of the implementation of the measures that the NRC has undertaken. The discussion in the first paragraph, page 5-42, is a possible introduction to the proposed section.

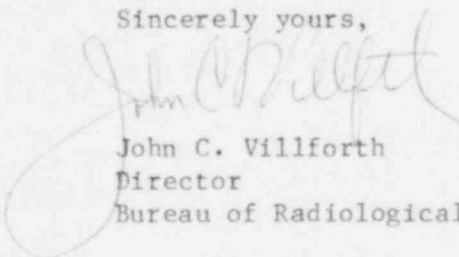
In view of the problems encountered in measuring the releases of radioactive materials at the Three Mile Island-2 reactor site, we believe that the emergency preparedness plan should contain specific information on the adequacy of radiation measuring instruments to be installed to detect the specific radionuclides in the wide range of concentrations expected from potential accidents, i.e., stack and containment monitors, and off-site direct radiation measuring devices. We suggest that the plan might be modified to address in particular the problem of monitoring radiohalogens (especially radioiodines) in the presence of radionoble gases. This could be accomplished by reference to FEMA-REP-2, a document on instrumentation systems prepared with considerable input from NRC.

4. The operational monitoring program for each facility is planned to be a continuation of the preoperational program. It appears that the program will provide adequate sampling and analysis of environmental media for specific radionuclides that will be required to measure the extent of emissions from the plant and to verify that such emissions meet applicable radiation protection standards.

5. Section 5.8.3 contains discussion of the uranium fuel cycle. The environmental effects presented are a reasonable assessment of the population dose commitment and the health effects associated with releases of Radon-222 from the UFC.

Thank you for the opportunity to review and comment on this draft document.

Sincerely yours,

  
John C. Villforth  
Director  
Bureau of Radiological Health