



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

July 22, 1981

4SA-EIS

50-416/417

Mr. Joseph A. Martore
Grand Gulf Project Manager
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Martore:

We have reviewed the Draft Environmental Impact Statement (DEIS) related to the operation of the Grand Gulf Nuclear Station Units 1 and 2 in Claiborne County, Mississippi. Our review suggests that most of the environmental concerns we raised in our comments on the Draft EIS for the construction of the Grand Gulf facility have been adequately addressed in either the Final EIS on the construction of the facility or the DEIS on the operation of the facility.

The discussion of the environmental and societal impacts of a core melt down accident included in the current DEIS greatly enhances the credibility of NRC's environmental review procedures. However, there are three areas under review that we feel need to be improved or expanded. These are: (1) treatment and/or storage of radioactive waste; (2) quantification of the design basis accidents, and (3) quantification of the economic risk of the cost of decontamination of the reactor building and the purchase of replacement power after an accident. These areas of concern are expanded in the attached technical comments.

We have rated the DEIS LO-2, i.e., we do not object to the project on environmental grounds but request that the FEIS be improved in those areas we suggested.

Sincerely yours,

John E. Hagan III, P. E.
Chief, EIS Branch

Enclosure:
Technical Comments



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TECHNICAL COMMENTS:

RADIOACTIVE WASTE TREATMENT SYSTEM (p. 5-14)

The Draft EIS does not contain a description of the radioactive waste treatment system or the NRC's evaluation of this treatment system. Instead the DEIS references the Safety Evaluation Report (SER), which is not currently available for review by EPA or the general public. While we are cognizant of the intent of Section 1502.21 of CEQ's Regulation to encourage the incorporation of material by reference into the DEIS for those "materials that are reasonably available for inspection by potentially interested persons", we do not believe that your referencing the unpublished SER suffices in the regard. Additionally, if past experience proves correct, the SER will not be made available to the general public. Therefore, we suggest that NRC should expand the discussion in the FEIS on the operation of the radioactive waste treatment system. Special emphasis should be placed on the solid radwaste system and its capability to accommodate the solid waste from the facility during its expected operational life.

ACCIDENT RISK AND IMPACT ASSESSMENT (p. 5-26)

When discussing accident risk and impacts of design basis accidents, the Draft EIS addresses probabilities of occurrence qualitatively. Yet, when discussing more severe core-melt accidents, the probabilities of occurrence are quantified (table 5.7). For consistency in the presentation of all environmental risks, we believe the probabilities of occurrence of infrequent accidents as well as the limiting fault design basis accidents should be included in the FEIS.

ECONOMIC RISKS (p. 5-31)

As the Three Mile Island accident demonstrated the cost of reactor building decontamination and replacement power following an accident are sizeable. Economic risks are addressed in considerable detail in the Draft EIS and based on low probability of occurrence annualized risk is shown to be in Figure 5.6. However, we believe these risks should be quantified and mentioned specifically in the benefit-cost summary in the FEIS.