

CONSTRUCTION IMPACT GROUP
c/o City of Richland
P. O. Box 190
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September 10, 1982

Mr. Jan Norris
Director
Division of Licensing
Office of Nuclear Reactor Regulations
UNITED STATES NUCLEAR REGULATORY
COMMISSION
Washington, D. C. 20555

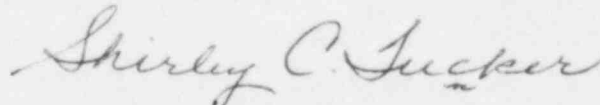
Dear Mr. Norris:

The enclosed comments represent the response of the Construction Impact Group to the Draft Environmental Statement related to the construction of Skagit/Hanford Nuclear Project, Units 1 and 2, Docket Nos. STN 50-522 and STN 50-523.

We appreciate your understanding of the factors that contributed to our delay in forwarding these comments. Hopefully our thoughts can still be included in the Final EIS which, we understand, will not be issued until December 16.

Your consideration of the concerns we have expressed is appreciated.

Yours truly,



SHIRLEY C. TUCKER
Chairman
Construction Impact Group

SCT:mc

Enclosures

cc: Nicholas D. Lewis, Chairman
Energy Facility Site Evaluation Council

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CONSTRUCTION IMPACT GROUP

Major Points of Concern

1. The socioeconomic analysis was limited to Benton and Franklin Counties and six cities within those counties (page 4-71) although population impacts are acknowledged to include Sunnyside, Grandview, and Mabton in Yakima County (page 4-93). These communities were excluded due to the small distribution outside of the Tri-Cities SMSA; however, the potential impacts are significant upon the relatively small populations of these cities and thus should be included.
2. Based almost solely upon the population projections for the Tri-Cities SMSA through the year 2000, which indicates a rapid fall in population continuing through 1986, and which are mitigated only somewhat if S/HNP is built (page 4-92), a variety of socioeconomic impacts (e.g., housing, public water supply, wastewater disposal system, solid waste disposal system, fire protection, police protection, etc.) from building S/HNP are considered to be minimal and no mitigation is needed. If, however, the population does not drop as rapidly or to as low a figure as projected, the impacts of S/HNP could be significant and mitigating measures might be necessary for any of these areas. Therefore, the accuracy of the population projections must be carefully scrutinized. While we can accept that population projections for the year 2000 will have a significant error, the years immediately in the future should be reasonably accurate to predict. In this case, the population census for 1982 is now available and may be compared with the projected figures. This has been done in the attached table, where the population predicted by the environmental statement (page 4-94) is compared with the actual census figures. Despite the fact that the census was taken almost concurrently with publication of the Draft Environmental Statement, there are significant differences. The Draft Environmental Statement predicts a loss of population from every jurisdiction, totaling 7,400. In fact, four jurisdictions showed an increase in population, only one jurisdiction (Benton City) showed a loss of population greater than predicted, and the total loss of population was 2,200, only 30% of the loss predicted.
 - a. Why was this 1982 prediction so far off?
 - b. Will the 1983 prediction be any closer to actual counts?
 - c. Was the decrease in population overestimated, thus leading to higher populations than estimated in years to come and mitigating measures thus necessary?

3. Page 4-23, Project-Related Impact Area: The conclusion that support facilities, housing, and commercial support services do not need to be developed may be invalid if the above discussed population estimates are incorrect or if other business and industry takes up the slack before the start of construction of S/HNP.
4. Page 5-16, Socioeconomic Monitoring: Socioeconomic impacts must be evaluated on a regional basis. Such items as population distribution, employment, traffic patterns and other factors are regional in nature, and affect, to a greater or lesser degree, most jurisdictions within the region. In addition, all impacts must be investigated and resolved well ahead of the impact occurring. Awaiting the occurrence of the impact, on a case-by-case basis, and then moving to mitigate that impact, is less than a satisfactory approach and is quite often a more expensive approach. In recognition of the fact that impacts must be evaluated on a regional basis, and that such impacts must be investigated and resolved prior to their occurrence, the Construction Impact Group was formed by the governing bodies of thirteen jurisdictions within the impact area. The sole function of that group is to investigate, analyze, negotiate and resolve impact issues. Thus, a mechanism and framework exist to address the impact issues in a manner that will assure a comprehensive regional solution. Use of that mechanism will, in turn, benefit the utility since the regional approach precludes fragmentation and the necessity of dealing with several individual jurisdictions on the same issue.

	<u>1981 Population</u>	<u>1982 Population Predicted</u>	<u>Predicted Change From 1981</u>	<u>1982 Actual Population</u>	<u>Actual Change From 1981</u>
Richland	33,700	32,500	-1,200	33,550	-150
West Richland	3,783	3,710	-73	3,934	+151
Kennewick	34,700	32,820	-1,880	35,350	+650
Benton City	2,150	2,140	-10	1,970	-180
Prosser	4,120	4,000	-120	4,170	+50
Benton County	113,400	107,810	-5,590	111,700	-1,700
Pasco	18,200	17,120	-1,080	19,050	+850
Franklin County	36,700	34,890	-1,810	36,200	-500

Trivial Errors in the
Draft Environmental Statement

1. Page 2-1: 8,710,000 square kilometer incorrectly converted to 3,350 square miles.
2. Page 4-8: Sodium hypochlorite, rather than sodium hypochlorate, will no doubt be used to disinfect the domestic water supply.
3. Page 4-21: The Hanford Reservation is actually contained within three counties (see map, page 4-20) rather than just Ben County.
4. Page 4-22: "The accelerated population growth . . . has largely been reversed . . ." Does this mean that we are now in an accelerated population decline as a result of the reversal?
5. The relationship between basic and secondary employment in the Tri-Cities is considered to be 1:0.8 on page 4-72 and 1:0.85 on page 4-76. Some consistency would be nice.
6. Page 4-78: No consideration has apparently been given to the construction of the Interstate highway system in the Tri-Cities, although this will generate 2,000 construction-related jobs in the next three years.
7. Page 4-82: Other Projects: The fact of annexation by a city has minimal effect on the success of a project.
8. Page 4-85: Is the \$25,180 consumption expenditure a per annum figure? The table on the same page should indicate that the numbers are given in thousands.
9. Page 4-99: Detailed data on housing stock is available as a part of census data from all jurisdictions. Also, the long period of time during which nuclear-related employment has occurred on the Hanford Reservation belies the statement of the transient nature of this employment on the Hanford Reservation.
10. Page 4-108: I-82 is incorrectly identified twice as I-182 on the map.
11. Page 4-110: Under item (7), to be useful, the two westbound lanes would have to be extended at least to West Richland, since little traffic would turn off in the Richland "flood-plain". This is probably an unrealistic solution.
12. Page 4-111: The suggestion regarding bicycling on the HOV lane in the non-peak direction would require cycling against rather than with the flow of traffic, in disobedience to state law.

13. Page 4-113: Benton City operates a wastewater system capable of handling 9,085 liters gallons of sewage. . .??? Not only confusing but the number is apparently low by a factor of 100.
14. Page 4-117: The table should be corrected to indicate that the vast majority of school children in the West Richland area attend the Richland schools, rather than Kiona-Benton.
15. Page 4-120: Actually the Richland Light Opera.
16. Page 4-129: Superscripts in the table are incorrect.
17. Page 4-157: -37.7°C incorrectly converted to -27°F .
18. Page 4-167: The nuclear fuel reprocessing facility might be more accurately described as being northwest of Richland.