



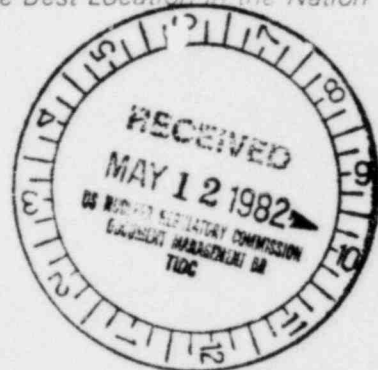
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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Dalwyn R. Davidson
VICE PRESIDENT
SYSTEM ENGINEERING AND CONSTRUCTION

May 10, 1982



Mr. A. Schwencer
Chief, Licensing Branch No. 2
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441
Comments on the Draft
Environmental Statement for PNPP

Dear Mr. Schwencer:

The Cleveland Electric Illuminating Company has completed its evaluation of NUREG 0884, "Draft Environmental Statement Related to the Operation of the Perry Nuclear Power Plant, Units 1 and 2." Our comments resulting from this evaluation are enclosed for your review and inclusion in the Nuclear Regulatory Commission's Final Environmental Statement.

The comments on the enclosed attachment are prefixed by the page number and location.

Very Truly Yours,

Dalwyn R. Davidson
Vice President
System Engineering and Construction

DRD: mlb

cc: Jay Silberg
John Stefano
Max Gildner

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1. Chapter 2

Due to the recent Commission vote to drop the need for power evaluation at the operating license stage, it is the applicant's position that the Final Environmental Statement should reflect this and that Chapter 2 should not be included in this document.

2. Chapter 3

Due to the recent Commission vote to drop the need to discuss alternative sites and alternative energy sources at the operating license stage, it is the applicant's position that the Final Environmental Statement should reflect this and that Chapter 3 should not be included in this document.

3. Pages 4-1, 4-3, 5-5; Sections 4.2.2 and 5.5.1

More recent field data on land use has been obtained. The ER-OL will be updated to reflect this new data.

	<u>New Data</u>	<u>Old Data</u>
Site Area	421.3 ha (1041 acres)	445 ha (1100 acres)
Plant and Facilities	93.9 ha (232 acres)	101 ha (250 acres)
Temporarily Disturbed	42.9 ha (106 acres)	121 ha (300 acres)

The reference used for the applicant's data is the NUS report, Terrestrial Ecological Monitoring Program at the Perry Nuclear Power Plant Site, 1981 Annual Report, NUS-3942, December 1981.

4. Page 4-3, Section 4.2.2, Paragraph 1, Line 4

The term "unique (nursery)" is not common terminology and should be deleted.

5. Page 4-3, Section 4.2.2, Paragraph 2, Line 2

The following suggested revision should be made: The second sentence beginning "Those areas..." should be deleted and instead the following sentence should be inserted, "Disturbed areas will be revegetated."

6. Page 4-3, Section 4.2.3, Paragraph 5, Line 1

The following revision should be made: In the first line delete, "at a rate" and insert, "at an average annual rate" after "evaporate water."

7. Page 4-6, Table 4.1, Line 4

The units for air flow rate should be changed. The units of ft^3/min for 1.5175×10^8 should be changed to lbs/hr . The figure $4.2976 \text{ m}^3/\text{min}$ should be changed to $6.88 \times 10^7 \text{ kg/hr}$.

8. Page 4-7, Table 4.1, Line 1

Change "17.01" to "17."

9. Page 4-14, Table 4.3, Line 9

The September temperature of 74°F should be 70°F as stated in ER-OL Table 2.4-1. This was referenced as the source for Table 4.3 in the DES.

10. Page 4-15, Section 4.3.5, Line 4

The DES states that the nearest intake is 5.7 miles NE at Madison-on-the-Lake. It should say that the nearest intake is 4.2 miles ENE at Madison Township.

11. Page 4-15, Section 4.3.5, Line 8

According to what was previously stated in the environmental report construction permit stage, the 12.4 mgd stated in the DES should be 11.4 mgd (Section 2.2.5, Page 2.2-13 ER-CP).

12. Page 5-1, Section 5.1, Paragraph 2, Line 6

The following suggested revision should be made: The sentence, "No significant impacts were noted by the staff." should be changed to read, "No significant impacts are anticipated as a result of using a recirculatory cooling system as opposed to a once-through system."

13. Page 5-4, Paragraph 3, Lines 4 and 5

It mentions the use of upper air soundings from Buffalo, New York, were used for visible plume analysis. The applicant's calculations on visible plume analysis was done using 3 years of sequential hourly on-site data at the Perry site. This is described in the ER-OL Page 5.1-10, Section 5.1.4. The following change in the DES should be made: Delete the first part of the sentence on Lines 4 and 5 that say, "Using upper air sounding from Buffalo, New York" and insert, "Using 3 years at sequential hourly on-site data at the Perry site."

14. Page 5-5, Section 5.5.1, Last Sentence

The area given for plant and facility use at 101 ha is not consistent with more recent field data. Refer to comment Number 3 for more information.

15. Page 5-7, Section 5.5.1.2, Line 12

There is no reference given at the end of Chapter 5 for the name (Carson).

16. Page 5-13, Section 5.5.2.3, Paragraph 2, Line 1

Delete the following item: "... as Appendix B of the PNPP operating license." Add the following to have it read, "An Environmental Protection Plan will be included in a supplement to the PNPP operations permit."

17. Page 5-17, 5-18; Section 5.9.2, Paragraph 6

The applicant will follow all specifications in the Radiological Environmental Technical Specification (RETS) and will meet the intent of 10-CFR50 Appendix I, Section IV.B.3. The last paragraph on Page 5-17 implies more than what may be specified in the applicant's Radiological Environmental Technical Specifications.

18. Page 5-21, Section 5.9.3.1.1, Paragraph 1, Line 5

In the DES the staff has projected that the collective occupational doses for each unit at PNPP will be 740 person-rem. This estimate is much higher than the 404 person-rem stated in the FSAR (Page 12.4-2).

19. Page 5-21, Section 5.9.3.1.1, Paragraph 4, Line 7

The NRC staff has used BEIR I radiation health risk estimates rather than using the more current BEIR III estimates. In using BEIR I the NRC staff had to ignore the BEIR I "Relative Risk" model. If BEIR III were used, the Relative Risk Model could be included and the final results would be reduced by 11 percent.

20. Page 5-27, Section 5.9.3.2, Paragraph 2, Line 3

A total population dose of 56 person-rem/yr to the general U.S. population is given by the NRC staff and used for cancer risk estimates. The value of 56 person-rem/yr is obtained from Table D-9 which includes a general U.S. public exposure from gaseous effluent of 43 person-rem/yr outside 80 km. The value of 43 is unsubstantiated and seems very high. Appendix B, which is supposed to describe this calculation, does not.

21. Page 5-29 through 5-31, Table 5.5

The footnotes for waterborne surface and drinking samples are incorrect. They should be (b) and not (a). A new footnote "(h)" should be created to denote the minimum 6-month sampling period for air iodine. The current footnote of (a) is confusing since it has reference to one full pasture season.

22. Page 5-29, Table 5.5, Page 5-29, Line 5 and Page 5-30, Line 4

Change "gross" to "gross beta" in the Type column.

23. Page 5-29, Table 5.5, Line 17

Change "E--site boundary" to "ESE--site boundary."

24. Page 5-30, Table 5.5, Line 13

The control water location that is stated in Table 5.5 has been changed from Cleveland to Ashtabula. The ER-OL will be updated to reflect this change.

25. Page 5-32, Section 5.9.3.4.1, Paragraph 2

Paragraph 2 is somewhat confusing to the applicant. In the DES it states that the NRC staff finds the preoperational environmental monitoring program acceptable as presented; however, it states that the NRC staff's position is that 40 dosimetry stations should be placed in each of the 16 sectors of the inner and outer rings. The remaining 8 stations should be placed at special interest areas.

The intent is not clear for the applicant fully meets the intent of this position. Thirteen of the radial sectors are located on Lake Erie. This eliminates the possibility of installing 13 dosimetry stations. Eliminating a proportionate number of the special stations to be installed accounts for 3 more stations. From the 40 stations mentioned by the NRC staff subtracting the 16 stations eliminated by Lake Erie, leaves 24 stations for installation which the applicant has met.

The DES should be more clear and less confusing.

26. Page 6-2, Table 6.1, Line 3

The number of "22 million/yr" is low. It should be 22.9 million/yr as referenced in section 5.8.1.

27. Page D-1, Section 2, Paragraph 4, Line 3

The DES on Line 3 states that meteorological considerations are discussed in Section 2.4. It is not clear what document is being referenced since neither the DES nor ER-OL Section 2.4 discusses meteorology.

28. Page D-4, Table D-1, Line 27

Off-gas building vent release for Cs-136 should read ".000002"
and not ".000000."

29. Page D-12, Table D-9

See Comment 21 on the "43 person-rem" number used by the NRC staff.