



THE AUDUBON SOCIETY OF NEW HAMPSHIRE

3 SILK FARM ROAD • CONCORD • NEW HAMPSHIRE 03301

TELEPHONE (603) 224-9909

TUDOR RICHARDS
EXECUTIVE DIRECTOR

July 6, 1982

To: Mr. Louis L. Wheeler, Project Manager
Office of Nuclear Regulatory Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

From: Audubon Society of New Hampshire
3 Silk Farm Road
Concord, New Hampshire 03301

Re: Draft Environmental Statement related to the
Operation of Seabrook Station
Docket Nos. 50-443 and 50-444

The Audubon Society of New Hampshire (ASNH) considers the application for an operating license for Seabrook II to be premature as that station is only 25% complete.

Section 1.3 Although the NRC has removed need for power as an issue in operating license proceedings, ASNH strongly urges that the pending decision in the need for power case now before the N.H. Public Utilities Commission be a prerequisite for the issuance of an OL for Seabrook.

Section 3. The economics of alternative energy sources has changed since the issuance of the CL, therefore ASNH requests that this be considered a "special circumstance". The alternative of not operating Seabrook should be evaluated.

Section 4.3.3.2 This section lists five "matters that remain to be disclosed and assessed". ASNH particularly urges greater attention to items (1), (2), (3), and (5).

Sections 4.3.3.2 (3) and 5.3.1 ASNH feels that the major change from backflushing to chlorination demands further investigation. Certainly the decision of the EPA Administrator of June 1977 that sections 316 (a) and (b) of the Clean Water Act have been complied with no longer holds true. (At the time of the CL hearings ASNH was a legal intervenor and concurred generally with the decision of the Region I Administrator which was overturned at the national level. Financial constraints forced ASNH to withdraw from the intervention subsequent to that decision.) The impacts of chlorination on marine life appear to be little understood. For instance, what are the long-term effects of the byproducts of chlorine on affected marine organisms?

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Sections 4.3.3.2 (5) and 4.3.5.1 ASNH manages, under contract with the N.H. Fish and Game Department, the endangered and threatened species program for the state. Although power plant siting is exempt from the provisions of the N.H. Endangered Species Act, ASNH recommends that the following information be included in the FES, in addition to the very limited references in the DES.

Federal Species: Bald Eagle

Two well documented and currently active wintering sites for Bald Eagles are located north and south of the proposed transmission facilities, at the Great Bay estuary and along the lower Merrimack River in Massachusetts. Birds from either site could be expected to forage occasionally at Hampton Harbor, and eagles traveling between the two sites would be likely to pass over the transmission corridor.

Peregrine Falcon Peregrines migrate along the N.H. coast and sometimes hunt over the saltmarshes during migration.

State Species: Marsh Hawk

This state-threatened species regularly occurs in the Hampton saltmarshes during migration and sometimes winters there.

Osprey; This state-threatened species occurs regularly over the N.H. coast, Hampton Harbor and the saltmarshes, and along the Merrimack River during migration.

Common Tern: A colony of this state-threatened species nests in the Hampton saltmarshes, and scattered nests also occur some years at Hampton Falls and Seabrook. Hampton Harbor is an important staging area for terns upon returning from spring migration and in preparing for fall migration.

Purple Martin: This state-threatened species nested historically along the Hampton saltmarshes and breeds currently in several colonies at the Parker River National Wildlife Refuge in Newburyport, Ma.

Section 5.5.1.2 The environmental and health effects of high-voltage transmission lines is an issue receiving close attention in the hearings on the proposed Hydro/Quebec power line. ASNH has been following this issue closely and urges the NRC staff to review the data submitted in this case.

Section 8. The current reduction in government publications available to the public severely handicaps organizations like ASNH which serve as education and information centers for the public. This reduction is seen as an infringement of "freedom of information" and "right-to-know". The list of recipients of this DES is shockingly brief, and ASNH protests its limitation to government agencies.

3. to Mr. Louis L. Wheeler

from Audubon Society of N.H.

Due to staff limitations ASNH is unable to comment on the radiological effects discussed in the DES. This is, however, an area of concern for the Society and will be studied as time and funds permit.

The highly controversial emergency planning debate has been fueled over the weekend just passed. Police reported that 100,00 people were present at Hampton Beach on each day of the weekend: July 3, 4 and 5. Hampton Beach is 2 miles downwind from Seabrook Station with very limited exit possibilities. Reports of the holiday weekend of traffic tie-ups 2 miles long were made. ASNH feels strongly that a satisfactory evacuation plan, if this is possible, must be in effect before an OL is granted.

One last general and related comment: The proposal to establish a single licensing process for nuclear power plants could well result in hazard to the public and to the environment. Seabrook is a case in point. Such a substantial change as that proposed in the cooling system should not be licensed without public participation. The same is true for other proposed changes. It is well known that new data have become available in the years between the CL and the present application. The considerable reduction in energy demand has changed the need for power predictions, as mentioned above. Biological, meteorological and other scientific and technical information has required updating in the 8 years since the FES was published. All of these factors and others, relating especially to health and safety, mandate a reappraisal before a plant should begin operation.

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3 SILK FARM ROAD

P.O. BOX 528-B

CONCORD, NH 03301-0932



Mr. Louis L. Wheeler, Project Manager
Office of Nuclear Regulatory Regulation
U.S. Nuclear Regulatory Commssion
Washington, D.C. 20555