

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION X

1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101



REPLY TO M/S 443
ATTN OF:

1 MAR 1982

Mr. Jan Norris
Environmental Project Manager
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Nicholas D. Lewis, Chairman
Energy Facility Site Evaluation Council
State of Washington
4224 6th Avenue S.E.
Olympia, Washington 98504

RE: Skagit/Hanford Nuclear Project
EIS Scoping Comments

Dear Messrs. Norris and Lewis:

The Environmental Protection Agency (EPA) has completed its review of the Application for Site Certification/Environmental Report (ASC/ER) for the proposed Skagit/Hanford Nuclear Project. Our review focused on identifying additional information and analyses which should be presented in the planned environmental impact statement (EIS). EPA has the responsibility under Section 309 of the Clean Air Act to review and comment on major Federal actions significantly affecting the environment. In carrying out this responsibility, we approach our review from two separate standpoints. The first is the adequacy of the information and analysis in areas where EPA has direct statutory or regulatory responsibilities. The second is the adequacy of the proposed EIS in terms of conformance with the CEQ regulations for preparing EIS's. EPA's rating of the Draft EIS, therefore, will have two components: one evaluating the environmental impacts of the proposed project, while the other addresses the adequacy of the information presented in the EIS.

EPA's principal statutory concerns center on the potential impacts that new power plants may have on the natural environment and on compliance with applicable environmental standards. We therefore look to the EIS to provide a thorough discussion of the proposed project's compliance with applicable environmental standards. The standards of importance for nuclear power plants are the radiological dose standards established in 40 C.F.R. 190 et. seq., wastewater effluent standards for steam-electric generating stations, ambient water quality standards for surface waters which receive wastewater discharges, and any standards which may apply to



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the disposal of hazardous and/or radioactive waste materials. The EIS should also evaluate the water supply intake and wastewater discharge structures' compliance with the Section 404(b)(1) guidelines under the Clean Water Act. Due to the short time frame available, we were unable to review the water quality thermal effects modeling contained in the ASC/ER. Consequently, we cannot provide comments on the technical aspects of the models used to evaluate the proposed plants' compliance with water quality standards. We are reviewing this modeling and will forward any technical comments as soon as possible.

In our review to date, we have identified a few areas where additional analyses or more information would strengthen the environmental impact evaluation. These are outlined below, while more detailed information and suggestions are provided in the attachment to this letter.

ENVIRONMENTAL INFORMATION NEEDS

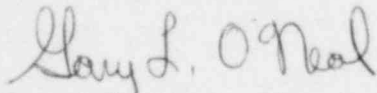
1. Environmental Consequences of Accidents: The ASC/ER evaluates the environmental and economic consequences of possible nuclear power plant accidents by combining the estimate of the probability of each potential accident with its estimated environmental and economic impacts. EPA believes that the probability estimates should be separated from the estimates of the impacts for each accident sequence and that a worst-case type analysis of the environmental effects of each such sequence should be presented in the EIS. This type of presentation would give the reader a much better picture of the magnitudes of the potential impacts and would be consistent with the provisions of the CEQ regulations governing situations in which there are large uncertainties.
2. Radiological doses from routine operations: The EIS should present a complete comparison of radiological doses from routine operations to the 40 C.F.R. 190.10(a) standards. In addition to presenting the total doses attributable to all nuclear power plant operations on the Hanford Reservation, it should present the individual doses attributable to this project, the continued operation of the Hanford Generating Project, and the operation of the WPPSS nuclear projects.
3. Radioactive Waste Disposal: The EIS should evaluate the potential environmental consequences of the alternatives being considered for disposal of solid radioactive wastes generated by the project. It should also evaluate the consequences of spent fuel disposal to the extent possible.
4. Provisions for and Consequences of Decommissioning: The EIS should discuss the methods which would be used to decommission the two nuclear units when they reach the end of their service lives and the environmental effects of such decommissioning.

OTHER CONSIDERATIONS

The CEQ regulations specify a number of components of an adequate EIS. Of particular importance is the analysis of alternatives. The EIS should contain a thorough analysis of a reasonable range of alternatives to the proposed action.

In closing we would like to note that because of the short time frames associated with this NEPA review, our comments on the Draft EIS may discuss issues which have not been identified in this letter. We appreciate the opportunity to participate in this scoping process and apologize for the delay which has occurred in the completion of this scoping review. We would be glad to discuss our suggestions and concerns with you and your staffs at your convenience. To arrange such discussions you should contact Dick Thiel, our Environmental Evaluation Branch Chief, at (206) 442-1266 or (FTS) 399-1266.

Sincerely,



Gary L. O'Neal, Director
Environmental Services Division

Attachment

cc: Sandy Williams, OFA (with attachment)
Grant Bailey, URS Inc. (with attachment)

U.S. Environmental Protection Agency

Detailed Scoping Suggestions Re:

The Skagit/Hanford Nuclear Project Environmental Impact Statement

Environmental Considerations

1. Groundwater: The EIS should mention the quality of the groundwater in the unconfined aquifer beneath the plant site. The site appears to be within the contamination plume from the 200-area where elevated concentrations of ^3H and $\text{NO}_3\text{-N}$ have been noted. The EIS might also consider the use of groundwater as an alternative water supply source for construction or emergency use. If this were to be done, a groundwater monitoring system would be needed.

2. Sanitary Waste: The volume of sanitary waste is reported [¶ 3.7.1.1] as ranging from 10,325 to 17,325 gallons per day. These figures are substantially greater than the five gallons per minute (7,200 GPD) reported [¶ 3.3.4] as the domestic water requirement. If both sets of figures are correct, the sources of the additional wastewater should be identified. On page 4.1-6, the text says that the package sewage treatment plant will be used to process the majority of the construction sanitary waste, however Table 3.7-1 shows construction sanitary sewage as greater than twice the design flow rate (17,325 GPD) for five of the 10 construction years. The EIS should indicate how this excess flow would be treated. It would also be helpful to have a diagram of flows entering the sanitary sewage disposal system.

3. Intake and Discharge Systems: Site-specific information is needed at the intake and outfall to evaluate both construction and operation impacts. Details on habitat characteristics, construction techniques, and schedules, as well as detailed drawings of both structures should also be presented.

Minor Technical Corrections

1. Figures 2.1-3, 2.1-2, and 2.8-1: Labels on the roads north of the Wye Barricade are inconsistent. Route 4 South is shown as both the road northwest and as the road northeast of the intersection.

2. Page G-6 Section III.1.2 - Although the S/HNP site is located on a Federal reservation, the restriction of public access to State Highway 240 which crosses the reservation, is minimal.