DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville MD 20857

JUL 29 1983

Mr. A. Schwencer
Licensing Branch No. 2
Division of Licensing
US Nuclear Regulatory Commission
Washington, DC 20230

Dear Mr. Schwencer:

The National Center for Devices and Radiological Health (NCDRH) staff has reviewed the Draft Environmental Statement (DES) related to the operation of Limerick Generating Station, Units 1 and 2, NUREG-0974 dated June 1983.

In reviewing the DES, we note that (1) the application for the construction permit was filed on February 26, 1970, (2) the Final Environmental Statement - Construction Phase (FES-CP) was issued in November 1973, and (3) construction permits for Units 1 and 2 were issued on June 19, 1974. The Radiological Health staff of the NCDRH has evaluated the public health and safety impacts associated with the proposed operation of the plant and has the following comments to offer:

1. The design objectives contained in Appendix I of 10 CFR 50 and in the EPA Uranium Fuel Cycle Standards, 40 CFR 190, as well as the applicant's proposed radioactive waste management system, provide adequate assurance that radioactive materials in the effluent will be maintained as low as reasonably achievable (ALARA). It appears that calculated doses to individuals and to the population resulting from effluent releases are within current radiation protection standards.

2. The environmental pathways identified in Section 5.9.3 and Figure 5.4 cover all possible emission pathways that could impact on the population in the environs of the facility. The dose computational methodology and models (Appendix B and D) used in the estimation of radiation doses to individuals and to populations within 80 km. of the plant have provided the means to make reasonable estimates of the doses resulting from normal operations at the facility. Results of the calculations are shown in Appendix D, Tables D-6, D-7, D-8 and D-9. These results confirm that the calculated doses meet the design objectives.

3. It is noted that the environmental impacts of postulated accidents will be published in a supplement to this DES. We will forego any comments until we have had an opportunity to review the supplement.

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4. The radiological monitoring program, as presented in Section 5.9.3.4 and summarized in Tables 5.8, appears to provide adequate sampling frequencies in critical exposure pathways. We understand that the operational monitoring program will be a continuance of the preoperational radiological monitoring program outlined in Table 5.8. The analysis for specific radionuclides are considered sufficiently inclusive to measure the extent of emission from the plant, as well as to verify that such emissions meet applicable radiation protection standards.

   As stated above, the monitoring program is considered adequate for routine operations. However, it would be helpful if a paragraph could be added to Section 5.9.3.4 that indicated the capabilities of the monitoring instrumentation to measure releases from the facility in the unlikely event of an accident. We are concerned about some of the monitoring problems that were identified during the Three Mile Island, Unit 2 accident. In particular, the problem of monitoring radiohalogens (especially radioiodine) in the presence of radionoble gas. This could be accomplished by reference to FEMA-REP-2, a document on instrumentation prepared with considerable input from NRC.

5. Section 5.10 and Appendix C contain descriptions of the environmental impact of the Uranium Fuel Cycle (UFC). The environmental effects presented are a reasonable assessment of the population dose commitments and health effects associated with the release of radon-222 from the UFC.

Thank you for the opportunity to review and comment on this Draft Environmental Statement.

Sincerely yours,

John C. Villforth
Director
National Center for Devices
and Radiological Health