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TEXAS UTILITIES GENERATING COMPANY Log # TXX-4144
SKYWAY TOWER • 400 NORTH OLIVE STREET, L.B. 81 • DALLAS, TEXAS 75201 File # 916

BILLY R. CLEMENTS
VICE PRESIDENT NUCLEAR OPERATIONS

April 6, 1984

Mr. B. J. Youngblood, Chief
Licensing Branch No. 1
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
COMMENTS ON DRAFT ENVIRONMENTAL
PROTECTION PLAN

Dear Mr. Youngblood:

We have reviewed the Draft Environmental Protection Plan (EPP) transmitted to us by your letter dated February 21, 1984. This letter is to transmit our comments on the draft plan.

Section 4.2.1, Groundwater Levels and Station Water Use Monitoring, states "Groundwater levels in the four onsite observation wells shown in ER Figure 2.4-1 shall be monitored and recorded...". By letter dated February 19, 1982 we informed the NRC of our intent to sell an excess portion of property we owned adjacent to the site. This property which has been sold contains observation well OB-1. As discussed in our letter we wished to allow the new owner unrestricted use of this well. We determined that the three remaining wells OB-2, OB-3, OB-4 would allow us to adequately evaluate any drawdown impacts. This determination is valid in light of the fact that observation well OB-3 is in the direction of the nearest offsite well and OB-1 is in almost the opposite direction relative to the production wells. This is illustrated in figure 4.3 in the Final Environmental Statement. We therefore request that the first sentence of Section 4.2.1 be changed to read "Groundwater levels in the onsite observation wells identified as OB-2, OB-3 and OB-4 in the FES-OL Table 5.2 shall be monitored and recorded...".

To specify more exactly when the wells will be monitored weekly instead of monthly, we also request the following words be added to the remainder of the first sentence of Section 4.2.1: "...monthly when the groundwater pumpage rate by CPSES is less than or equal to 30 gallons per minute (gpm) and weekly when the CPSES average montly rate exceeds 30 gpm for the previous month." The added words are underlined. Specifying a monthly average rate is appropriate considering that the NRC concluded in section

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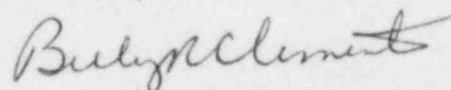
11.6.7 of The Final Environmental Statement - Construction Permit Stage that an annual average withdrawal rate of 30 gpm is acceptable. A monthly average for pumpage rate is also consistent with record keeping requirements of the draft EPP.

For the same reasons stated above, we request that the first sentence of Section 4.2.2(2) be changed to clarify that the accompanying groundwater pumpage rate of 30 gpm is a monthly average. This sentence should read "..., if such outages are accompanied by an increase in the monthly average groundwater pumpage to a rate exceeding 30 gpm."

We also request that the second sentence of section 4.2.2(2) be changed to clarify that the groundwater pumpage rate to be considered be averaged over the anticipated outage period. The sentence should read "When it is determined that either routine or unplanned outages will exceed 30 consecutive days and when the groundwater pumpage rate will be greater than 30 gpm when averaged over the outage period,...".

We believe that with the requested changes the draft Environmental Protection Plan is appropriate for Appendix B to the Comanche Peak operating license. If you have any questions about this matter, please contact Mr. Richard Werner at (214) 979-8227. Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script, appearing to read "Billy Clement".

RAW/grr