

## Washington Public Power Supply System

3000 George Washington Way P.O. Box 968 Richland, Washington 99352-0968 (509)372-5000

Docket No. 50-508

May 11, 1984  
G03-84-315

Director of Nuclear Reactor Regulation  
Attention: G. W. Knighton, Chief  
Licensing Branch No. 3  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Knighton:

Subject: SUPPLY SYSTEM NUCLEAR PROJECT NO. 3  
DRAFT ENVIRONMENTAL STATEMENT (NUREG-1033)  
COMMENT LETTERS

Reference: Letter, G.W. Knighton, NRC, to D.W. Mazur, Supply  
System, dated April 6, 1983.

In the referenced letter the Supply System was invited to respond to comments on the subject document as we deemed appropriate. We have taken the opportunity to offer the following limited observations.

Letter by Blanchard, Department of the Interior. The reviewer seems to have neglected the fact that the DES-OL assessment of severe accident consequences has assumed comprehensive failure of engineered safety features. He has also neglected the fact that the risk associated with such failure is much less than for the airborne pathway (DES, p. 5-53) which is exceedingly small. In the third and fourth paragraphs, the reviewer suggests that the DES should address, as an alternative liquid pathway, potential penetration into the sandstone and transport with groundwater. While we believe such a pathway to be more plausible (RQ240.13 and RQ240.14), the DES takes the more conservative approach and does not consider groundwater transport.

Letter by Ploudre, Department of the Army. The reviewer would like the Department's permit authority acknowledged in Section 1.3. Having obtained several Section 10/Section 404 permits, we are aware of this authority and judge the DES reference to ER-OL Section 12 to be sufficient. Regarding the reviewer's second comment, we believe the DES reference to the relevant rulemaking provides sufficient support for the general statements. In the fourth comment, the reviewer suggests that chlorinated organics may be formed during cooling system

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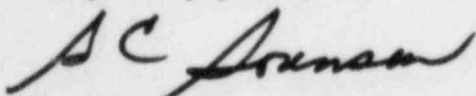
biofouling control. We note that the possibility of the formation of such byproducts was considered by EPA in the development of power generating plant effluent limitations which were revised in November of 1982. Of course, disinfection of drinking water and sanitary waste effluent provides a more ubiquitous source of chlorination byproducts. Referring to Section 5.9.3.4, the reviewer suggests the DES is inadequate with respect to monitoring sediments, but he overlooks Table 5.3 which describes the monitoring program.

Letter by Lundblad, Department of Ecology. The reviewer notes that site access can impact plans for plant security and emergency response, but the relevance of such details to the NEPA assessment is less obvious. The road connection he refers to is shown on DES Figure 4.2.

Letter from Freudenburg, Washington State University. The reviewer believes the DES is inadequate because it fails to account for the results of studies he completed, which he claims establish that there is greater local opposition to nuclear facilities being constructed and operated by the Supply System than in all other "'normal' host communit(ies)." He further states that this and other reports have noted "that the social consequences of permitting operation of a facility over such intense objections could be grave indeed." The reviewer's comments do not draw any nexus between the responses to his mid-1980 public attitude survey and the requirements of NEPA which the NRC must satisfy. It is not clear to what "consequences" he is referring. How public attitudes are translated into an "environmental impact" within the meaning of Section 102(c) of NEPA is not explained. Perhaps, by reference to the Supreme Court in NRC v. PANE (No. 81-358 and No. 81-2399, Met. Ed. Co. v. PANE), he is suggesting that his estimate of local opposition reflects some measure of personal apprehensions arising from perceived risk of plant operation and that these apprehensions may be manifested in emotional and physical distress. If, indeed, Freudenberg is arguing such a connection (one not obvious from his report), we believe that the Supreme Court's opinion in the cited case is very relevant. The postulated "consequences" are too distant from "environmental impacts" within the meaning of NEPA for the NRC to be required to consider them.

We hope these comments are useful in preparing the FES-OL.

Very truly yours,



G. C. Sorensen, Manager  
Regulatory Programs

JPC/kd

cc: J. Adams (NESCO)  
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