United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

ER 84/95

MAR 15 1984

50-508

Director, Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sir:

The Department of the Interior has reviewed the draft environmental impact statement related to the operation of WPPSS Nuclear Project No. 3, Grays Harbor County, Washington and has the following comments.

As noted on page 5-51, the accident analysis shows that the plant's passive underdrain system could deliver radioactive sump water to Workman Creek in the event of a core-melt accident. The effects on Workman Creek, Chehalis River, and Grays Harbor, only briefly suggested, could be severe. The statement mentions a possible mitigation measure—the sealing of the underdrain, apparently after an accident on page 5-52. However, it is not clear that the sealing of the drain after the accident can be assured before a major radioactive release has occurred. The question arises why the underdrain system does not include provisions to shut off or divert to safe storage any contaminated flow from the reactor. It would be simpler to provide for these measures before an accident has occurred than afterward.

The proposed sealing of the underdrain outflow would retain the highly radioactive water. The statement should discuss the long-term adequacy of the storage capacity of the underdrain system and should evaluate the system's long-term integrity, if it is used to retain the contaminated sump water. This evaluation should consider the potential for ground-water impacts if a loss of the underdrain system's integrity should release the contaminated water to the ground-water environment. The statement should also explain how the passive underdrain system below and in the vicinity of the reactor would be protected against damage if the basemat failed.

The Reactor Safety Study (WASH-1400) includes an analysis of possible depth of penetration of a core-soil mass; heat transfer calculations indicated that this mass would be about 50 feet high. Thus, the Class-9 accident analysis for WPPSS No. 3 should assess the integrity of the underdrain system if 50 feet of penetration should occur. A sketch of the underdrain system should be provided in the final statement.

We hope these comments will be helpful to you.

Sincerely,

Bruce Blanchard, Director
Environmental Project Review

C002
1/0