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October 1, 1984
RBG-19,069
File No. G9.5

Mr. Harold Denton
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Denton:

River Bend Station Unit 1
Docket No. 50-458

Attached hereto are Gulf States Utilities Company's (GSU) comments on your Draft Environmental Statement related to the operation of River Bend Station, NUREG-1073. Overall the document is very satisfactory and GSU agrees with the conclusions reached.

Sincerely,

J. E. Booker

J. E. Booker
Manager-Engineering
Nuclear Fuels & Licensing
Nuclear Bend Nuclear Group

JEB/JWC/kt

Attachment

C002
1/1

Gulf States Utilities Company's Comments on Draft Environmental Statements related to the Operation of River Bend Station, NUREG-1073

1) Although the DES is intended to address the environmental impact of a single unit and it is recognized that two unit impact is conservative, it is unclear in several sections whether one or two unit impacts are being discussed. Where two unit information from the ER-OLS is used in the DES, the impacts should be so noted. (paragraph (3) on pg. v)

2) The net electrical output of the station should be revised to read 936 MWe. (paragraph (4)(a) on pg. v)

3) It is not presently planned to use the River Bend site for recreational use. (Section 4.2.2, first paragraph, last sentence)

4) Reference to the standby cooling tower should be singular. (section 4.2.3.1, last sentence)

5) The polyelectrolyte dosage for the cooling tower makeup water treatment system will be 1 to 2 ppm. The final concentration of suspended solids in the clarified makeup water will be less than 10 ppm. (Section 4.2.3.4, second paragraph)

6) Correct to read "As described in the ER-OLS". (Section 4.2.3.4, third paragraph)

7) The diluted sludge flow discharged to the river will average 520 gpm as per Fig. 4.2. (Section 4.2.4.3, last paragraph)

8) Evaporation of water within the circulating water system concentrates both suspended and dissolved solids, or total solids. (Section 4.2.6.1, second paragraph, first sentence)

9) The capacity of the sanitary waste treatment system for River Bend has increased since the FES-CP was issued. A third sewage treatement plant sized to handle 25,000 gpd will be used to augment the treatment plant capacity required during refueling or overhaul outages. The treatment plant has a capacity of 178 X 10^3 L/d (47,000 gpd) and will discharge to the storm sewer at an average rate of 23 L/min (6.1 gpm). (Section 4.2.6.4; 4.2.6.1; 5.2.3.4)

10) In discussing the environmental impacts of transmission line system it seems more appropriate to discuss route lengths rather than circuit lengths. Reference ER-OLS Sections 2.2.2 and 4.3.1.2 (Paragraph (d) page vi; Section 4.2.7)

11) Additional transmission lines may be constructed along all three routes. However, these lines will not be associated with River Bend Station Unit 1. The second and third sentences are misleading as worded. (Section 4.2.7, third paragraph)

12) "Plant makeup water" can be misinterpreted as makeup to the condensate system. It is suggested that "Makeup water to the main cooling towers" be substituted. (Section 4.3.1.1.1, third paragraph, first sentence)

13) Mention is made of the sediment deposition from Alexander Creek during flood flows. This should be put into perspective with sediment deposition from the river during floodplain inundation, since deposition from the river is a great deal more than that contributed by Alexander Creek. (Section 4.3.1.1.1, Local Streams, third paragraph, last sentence)

14) Instead of a concrete spillway, the water level in the Wildlife Management Lake will be controlled by two 36-in. by 22-in. corrugated metal overflow pipes. (Section 4.3.1.1.1, Local Ponds, first paragraph)

15) The "30m" should be corrected to read "50m". (Section 4.3.3, last paragraph, first sentence)

16) The note "* monitored" refers to treated radwaste effluent. (Figure 4.2)

17) It should be noted that these areas were based on a two unit plant. (Table 4.1)

18) The chemicals used for water treatment in the auxiliary boiler for pH and oxygen control have changed. The expected chemical composition of the auxiliary boiler blowdown should be revised to:

Sodium (Na)	496 ppm
Sulfate (SO_4)	1034 ppm
Total Dissolved Solids (TDS)	1530 ppm
PH (units)	8.5 to 10.5

(Table 4.5)

19) Normal cooling tower blowdown is discharged at a constant rate of 2200 gpm (4.9 ft^3/sec). Other discharges via the blowdown line will be intermittment, with a total maximum flow of about 2612 gpm (5.8ft^3/sec). Using a minimum river flow rate of 100,000 ft^3/sec, (reference ER-OLS Section 2.3.1.1) the dilution factor is more than 17,000 times that of the discharge. (Section 5.3.2.3)

20) Waste streams, such as floor and equipment drains and excess well water are discussed as "Impacts from Sanitary Wastes". These should be discussed as "Other Waste Discharges". (Section 5.3.2.4)

21) The National Electric Safety Code does not restrict the mitigation of potential and actual problems with shocks involving induced currents or spark discharges to grounding. To allow for other mitigation techniques, GSU suggests the wording:

"The applicant mitigates potential and actual problems with shocks involving induced currents or spark discharges for objects near the transmission line in accordance with the National Electrical Safety Code (NESC) which requires induced current to not exceed 5mA."

(Section 5.5.1.2, paragraph 4, fifth sentence)

22) The word "intake" should be inserted between "water" and "structure". (Section 5.5.2.1, first paragraph, first sentence)

23) In discussing the design features of River Bend, no mention is made of the fuel building filtration system as a secondary containment. This system encloses the spent fuel pool rather than the SGTS. Reference FSAR Sections 9.4.2 and 6.2.3. Also the penetration valve leakage control system (FSAR Sections 9.3.6 and 6.2.3) and the turbine building valve leakage control system (FSAR Sections 10.3.2 and 10.4.3.2) should be considered for mention. (Section 5.9.4.4 Design Features)

24) GSU has calculated sound pressure levels expected to occur from the operation of River Bend Station. We believe our COMSOL computer model to be reasonable and that the predicted community reaction to be less severe than what the NRC model predicts. However, as stated in ER-OLS Section 6.7, GSU will conduct a noise monitoring program when Unit 1 is in operation to confirm estimated sound levels. (Section 5.12)

25) Only 44 direct radiation measurement locations will be used. One of the special interest locations doubles as an inner ring location. Therefore, if it is considered an inner ring location, then only 9 special interest locations should be identified. For produce samples GSU will obtain three kinds of broadleaf vegetation from each of two onsite gardens in sectors of the highest calculated annual average ground-level D/Q. (Table 5.7)

27) It is uncertain what the source is for these design-basis accident doses, although the text under Design-Basis Accidents states that they are the Applicant's estimates. Applicants estimates are found in ER-OLS Table. (Table 5.9)

28) The auxiliary building does not have a separate exhaust stack. Its ventillation exhaust is routed to the main plant exhaust stack. However, the radwaste building does have a separate release point. (headings Table D-1; footnotes Table D-2) Auxiliary building exhaust is not filtered during normal operation. The Staff's estimates of particulate values appear to be corrected for filtration. (Table D-1)