UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Services Division
Habitat Protection Branch
14 Elm Street
Gloucester, Massachusetts 01930

AUG 10 1984

Mr. David H. Wagner, Project Manager
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Wagner:

The National Marine Fisheries Service has reviewed the draft environmental impact statement related to the Operation of the Hope Creek Generating Station, dated June, 1984, and offers the following comments.

4 PROJECT DESCRIPTION AND AFFECTED ENVIRONMENT

4.3.4.2.3 Benthic Populations
p 4-14

This section is limited to a discussion of the biofouling of the Salem Unit's water intake by invertebrates. We suggest it be expanded to include a discussion of benthic populations of the nearby bay. Emphasis should be placed on those important food-chain species eaten by indigenous and anadromous fish.

4.3.4.2.4 Fish Populations
p 4-15 para 2

Many species of fish, as well as invertebrates, experience long-term shifts in abundance for various reasons. However, one or two year studies do not reflect these trends, leaving significant data gaps. A long term decline or rise in abundance in an important species may be attributed to the operation of the plant, when, in fact, it could be an expected and natural phenomena.

4.3.5 Endangered and Threatened Species
4.3.5.2 Aquatic
p 4-16

It should be noted that recent investigations with shortnose sturgeon show that the method used to capture this species is crucial. Undersized trawls, for instance, seem to bypass them.

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5 ENVIRONMENTAL CONSEQUENCES AND MITIGATING ACTIONS

5.3 Water
5.3.1 Water Use Impacts
5.3.1.1 Surface Water
p 5-2 para 3

There should be an estimate of how much, if any, effect the plant will have on the salinity regime of the bay, especially in light of the suspected upstream migration of the salt wedge.

5.5 Terrestrial and Aquatic Resources
5.5.2.1.1 Phytoplankton Entrainment
p 5-10

Entrained organisms do provide nutrients for decomposer organisms. However, if a substantial number of phytoplankters are entrained, there could be a proportionate shift in the diversity of the bay's trophic consumers from active predators to passive consumers.

5.5.2.1.3 Ichthyoplankton Entrainment
p 5-11 para 3

These numbers could change with a long term shift in population make-up. Striped bass, for instance, could increase in numbers.

5.9.4 Environmental Impacts of Postrelated Accidents.
5.9.4.2 General Characteristics of Accidents
(2) Exposure Pathways
p 5-32

This section should discuss the effects of radiation on the estuarine food chain.

Sincerely yours,

Susan Miller
for Bruce E. Higgins
Acting Branch Chief