



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

SEP 14 1984

Food and Drug Administration
Rockville MD 20857

Mr. A. Schwencer
Chief, Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Schwencer:

The Center for Devices and Radiological Health staff has reviewed the Draft Environmental Statement (DES) related to the operation of the Hope Creek Generating Station, NUREG-1074, dated June 1984. We have the following comments to offer:

1. It appears that the dose-design objectives of 10 CFR 50, the operating standards of EPA's 40 CFR 190, and the facility's radioactive waste management system (Section 4.2.5) provide adequate assurance that the potential individual and population radiation doses meet current radiation protection standards.
2. The environmental pathways identified in Section 5.9 and shown schematically in Figure 5.3, page 5-71, cover all possible emission pathways that could impact on the population in the environs of the facility. The dose computational methodology and models (Appendix B and D) used in the estimation of radiation doses to individuals near the plant and to populations within 80 km of the plant have provided the means to make reasonable estimates of the doses resulting from normal operations and accident situations at the facility. Results of the calculations are shown in Appendix D, Tables D-6, D-7 and D-8 and confirm that the calculated doses meet the design objectives.
3. The discussion in Section 5.9.4 on the environmental impacts of postulated accidents is considered to be an adequate assessment of the radiological exposure pathways and the doses and health impacts of atmospheric release. The inclusion of Section 5.9.4.5 (7) on the uncertainties associated with the assessment of potential environmental impacts and emergency response effectiveness should prove to be helpful in understanding the analysis of potential accidents. The discussion in Section 5.9.4.4(3) on emergency preparedness does not include a statement on the location and function of an emergency operations facility (EOF) for mitigating the consequences of an accident that was identified in the NRC's "Lessons Learned" report following the TMI accident on March 28, 1979.

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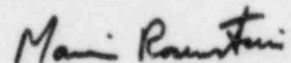
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4. The radiological environmental monitoring program outlined in Section 5.9.3.4 and summarized in Table 5.11 provides adequate sampling and analysis of environmental media for specific radionuclides to (1) verify the effectiveness of in-plant systems used to control releases of radioactive material, (2) ensure that unanticipated buildups of radioactivity will not occur in the environment, and (3) verify that such emissions meet the applicable radiation protection standards. Since radiological monitoring is an important program in protecting the public health, we would appreciate being informed about the specifics of the final operational monitoring program that will be incorporated into the operating license Radiological Technical Specifications.

5. Section 5.10 and Appendix C contain a description of the environmental impact assessment of the uranium fuel cycle related to the Hope Creek facility. The environmental effects presented are a reasonable assessment of the population dose commitments and health effects associated with the release of radon-222 from the uranium fuel cycle.

Thank you for the opportunity to review and comment on this draft environmental statement.

Sincerely yours,



Marvin Rosenstein, Ph.D.
Director
Office of Health Physics
Center for Devices and
Radiological Health