



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J. F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203

September 12, 1984

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

RE: D-NRC-B06004-CT

Dear Sir:

In accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act, we have reviewed the Draft Environmental Impact Statement (EIS) relating to the operation of the Millstone Nuclear Power Station, Unit No. 3, located in the Town of Waterford, New London County, Connecticut.

From the standpoint of EPA's areas of jurisdiction and expertise, we do not object to the proposed operation of Millstone Unit No. 3. However, we believe the paragraphs in Section 4.2.3 "Water use and treatment" (page 4-2), and in Section 4.2.6 "Biocide Wastes" (page 4-6) which address chlorination are poorly written, confusing, and lack the clarity presented in other EISs such as the Seabrook Station Operation EIS. We recommend that the following points be clarified in the Final EIS for Millstone Unit No. 3:

- The Final EIS should state if chlorine will be used to control macro as well as micro organisms in the cooling water system. The NPDES Permit does allow chlorine to be used.

It must be assumed chlorine will be used only when the Amertap system is not functional or it is impossible to use backflushing. This unusual condition could be clearly stated. The amount of chlorine to be used and the expected frequency of usages should be stated immediately in the text with references to the NPDES permit conditions.

- The necessity of using frequent chlorination on the service water system for safety reasons should be explained. The NPDES Permit allows for chlorine to be used. The amount and frequency of injection should be stated immediately in the text with permit references.

- The intermixing of "total residual oxidants" and "free available chlorine" terminology is confusing. In the EIS, the term "total residual oxidant" (TRO) appears to be used exclusively as the discharge characteristics at the Quarry Cut as prescribed by the EPA Regulations and the NPDES Permit. The use of "free available chlorine"

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(FAC) is used internally within the plant for operational process control and not associated with complying with EPA Effluent Guideline Limitations. If this conclusion is correct, the EIS should so indicate.

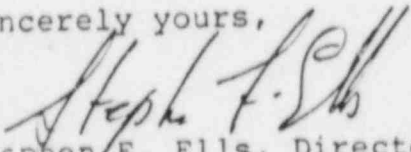
- The total Millstone Chlorination Program for Units 1, 2, and 3 should be explained so that the entire picture could be understood. The total discharge concentration of TRO for some of the various operational scenarios for the three units should be given so that the range of expected TRO concentrations from the Quarry Cut can be understood: TRO level if all cooling waters (3 units) are chlorinated simultaneously; TRO level if only three service waters are chlorinated; TRO levels for Unit 3 cooling water and service water are concurrently chlorinated, etc.

- A block diagram on the chlorination system similar to the Seabrook Operation EIS Diagram Figure No. 4.5 might be appropriate to explain the overall process for all three units. The portions of the systems that would be subject to thermal backflushing could be shown in heavy or dashed lines on the same diagram.

- The Millstone #3 Operational EIS should approach the Seabrook Operational EIS in detail and clarity. This would prevent any erroneous comparisons between the two stations in any litigation that may occur at either station. It is recognized that the two stations are very different and this difference should be easily perceived particularly when the Operational EIS's for the two facilities are compared.

In accordance with our national EIS rating criteria, a copy of which is enclosed, we have rated this Draft EIS LO-1 (Lack of Objections - Adequate). If you have any questions about our comments, I hope that you will contact Donald Cooke of my staff at 617/223-1739. Please send three copies of the Final EIS when the document becomes available.

Sincerely yours,


Stephen F. Ells, Director
Office of Government Relations
and Environmental Review (RGR)

Enclosures

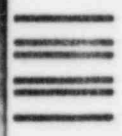
cc: B.J. Youngblood, NRC
Elizabeth L. Doolittle, NRC
Stanley J. Pac, Commissioner, CT DEP

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