



SEP 14 1984

Mr. B. J. Youngblood
Licensing Branch No. 1
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Youngblood:

The Center for Devices and Radiological Health staff has reviewed the Draft Environmental Statement (DES) related to the operation of Millstone Nuclear Power Station, Unit No. 3, NUREG-1064, dated July 1984.

It is recognized, in reviewing the DES, that this is an administrative action for issuance of an operating license. We note that as of June 25, 1984, the construction of Unit 3 was about 86.5 percent complete. Our staff has evaluated the public health and safety impacts associated with the proposed operation of the plant and have the following comments to offer:

1. It appears that the dose-design objectives of 10 CFR 50, Appendix I, the operating standards of EPA's 40 CFR 190, and the facility's radioactive waste management system 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 Figure 5.4, page 5-77, 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 Appendix 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 these calculations are shown in Appendix D, Tables D-6a, D-6b, D-7 and D-8 and confirm that the calculated doses meet the design objectives.
3. The discussion in Section 5.9.4 on environmental impact of postulated accidents is considered to be an adequate assessment of the radiological exposure pathways and the dose and health impacts of atmospheric releases. We are pleased to note that Section 5.9.4.4 (3) on emergency preparedness has been modified to incorporate certain comments we have submitted on this section previously. The lessons learned from the accident at Three Mile Island - Unit 2 on March 28, 1979, identified the need for an emergency operations facility (EOF) at operating nuclear plants. Section 5.13 indicates that such a facility has been established and will function to meet the operational emergency needs of Unit 3, as well as Units 1 and 2.

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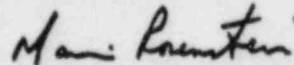
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4. The radiological environmental monitoring program outlined in Sections 5.9.2, 5.9.3.3, and 5.9.3.4, and summarized in Tables 5.11 and 5.12 provides adequate sampling and analysis of environmental media for specific radionuclides to (1) verify the 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. As indicated in Section 5.9.3.4.2, the operational radiological monitoring program is conducted as a continuance of the pre-operational program with periodic adjustment of sampling frequencies in critical exposure pathways based on experience obtained from monitoring Units 1 and 2. Since radiological monitoring is an important program in protecting public health, we would like to be 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 Millstone 3 facility. The environmental effects presented are a reasonable assessment of the population dose commitments and health effects associated with releases of radon-222 from the uranium fuel cycle.

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

Sincerely yours,



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

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HEALTH AND HUMAN SERVICES**

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