

January 3, 1985

P. O. Box 3434
Augusta, GA 30904-1434

To: Director, Division of Licensing
Nuclear Regulatory Commission
Washington, DC 20555

From: Judith E. Gordon, PhD. Conservation Chair
Savannah River Group, Sierra Club

Judith E. Gordon

Re: Comments, draft EIS, Plant Vogtle, Burke County, GA.

Most of the members of the Savannah River Group reside within a 30 mile radius of the proposed Vogtle facility and are most certainly concerned about the environmental effects of this facility. In particular, we wish to address the following points:

1) Levels of chloride discharge. Table 4.5 describes the "plant effluent discharged to the Savannah River", and lists combined chloride effluent as 20 mg/l. In section 5.5.2.1, EPA standards for chloride levels are stated to be 0.01 mg/l; even with a river dilution factor of 8.6, the total chloride level would not be brought down to EPA standards. This section implies that these standards may be unduly restrictive, particularly because the discharge will not be continuous. However, the applicant has failed to take into account any chlorides already present in the river water from upstream sources. Further, during cooler weather, fish may be attracted to the warmer effluent waters and therefore be subjected to high chloride concentrations prior to dilution. We think the EPA chloride limitations should be strictly enforced and monitored.

2) Entrainment and impingement. While it appears that the effect of Vogtle operations will be minimal, the combined effect from Vogtle, SRP, and any future projects such as low-level hydroelectrical generating facilities, may be cumulatively damaging to the health of the Savannah River fisheries. We are concerned that there seems to be a concentration of water withdrawing facilities along this stretch of the Savannah River, and since fish passage is greatly impeded by the New Savannah Bluff Lock and Dam, it appears that no agency is currently considering the total effect of all these facilities. Each facility, like Vogtle, claims to affect minimal damage, but collectively, the potential for damage is considerable.

3) Radionuclides in effluents. The NPDES permits in Appendix E fail to mention monitoring of radionuclides. However, according to 40 CFR Part 122.53 (d)(7)(iii)(B) and Table IV to Appendix D to Part 122, applicants must supply test data for these. Presumably, some sort of standard would then be set for these radionuclides, and these should be listed in the permits.

4) Ebenezer Creek Swamp, line crossing. Section 5.2.2 and Appendix J discuss the possible routes by which Ebenezer Creek Swamp Natural Landmark might be crossed by transmission lines.

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Fig. 4-12, which maps this area, is so poorly reproduced that it is extremely difficult to even determine which routes are being designated "A", "B", etc. We do not agree that the route acceptable to the US Fish & Wildlife Service is compatible with the nature of a natural landmark. If any action were appropriate, it would be the gradual elimination of any transmission lines in such an area. The fact that Georgia Power et al. would add to this intrusion may not be illegal, but it is surely not in keeping with the intent of the Landmarks Program.

Were there some great need for the power to be generated by Vogtle, such an intrusion might be justified, but there is no real need for this power. At the very least, this is one more example of a monopoly's lack of responsiveness to anything but profit motives.

The fact that Georgia Power et al. and the NRC are willing to build higher towers to reduce environmental damage at the site looks charmingly accommodating on paper. However, this "compromise" should not obscure the fact that powerlines are out of place in such an area and should not be permitted. Either Route A or B, the two west of the swamp, should be chosen.

5) Salt deposition from cooling towers. Does the information presented in section 5.5.1.1 include the results of an NRC staff review of the reassessment of salt drift by applicants? There is also no mention in the draft EIS of chlorine gas releases as asked for with the acceptance of CPG's Contention 12 at the September 5, 1984 Prehearing Conference before the NRC Atomic Safety and Licensing Board. Table 5.3 does not explain the calculations that produced the values for land depositions (last line); consequently, there is no basis for judging the accuracy of the calculated depositions.

6) Decommissioning. The experience record outlined in section 5.11 is hardly reassuring. According to the Critical Mass Bulletin, November 1984, NRC is just now releasing its compliance standards for decommissioning risks and costs, so therefore, these are not a part of this draft EIS. Experts such as M. Resnikoff and R. Pohl state that the concrete containment shell will have crumbled before the nickel-59 and niobium-94 it is meant to contain will have decayed to safe levels. Yet the isolation and use of the containment dome is one of the principal means currently being incorporated into decommissioning schemes.

The problem of paying for decommissioning has barely been considered. Of particular concern is the fact that 84% of the \$600 million of decommissioning funds collected nation-wide have been used for plant construction and other purposes (Critical Mass Bulletin, November, 1984). Since these funds are not segregated, any future utility crisis would result in little money being available to pay for decommissioning costs. How do the applicants intend to handle such money? In section 6.4.2, the applicants estimate the decommissioning cost of Vogtle to be \$50 million in 1980 dollars. What kind of estimation is this for a plant that will likely be ready for decommissioning around the year 2020, not 1980?

7) Transportation of spent fuel. Table 5.7 is unreadable and fails, furthermore, to adequately address the obvious dangers associated with transport of high-level radioactive waste. Numerous experts have repeatedly stated that the shipping

casks have been inadequately tested and that the Price-Anderson Act limits liability for one accident to \$560 million. Realistically, costs in a severe accident could go into the billions (M. Resnikoff, 1983, The Next Nuclear Gamble; R. D. Lipschutz, 1980, Radioactive Waste, Politics, Technology, and Risk). A survey by R. Kearney, Dept. of Sociology, Univ. of S. Carolina, 1982, showed that adequate plans are not in place for handling spillage of nuclear wastes on highways. In Richmond County, Georgia, the FEMA director, Pam Smith, stated that local law officers were just beginning (April 1984) to receive training and detection instruments for responding to and handling radioactive spills, and that it would be several years before the program was completed.

This draft EIS contains no surveys of highways and railroad conditions in the vicinity of Plant Vogtle. There is no consideration given to possible routes for spent fuel transport. There is no mention of a viable evacuation plan for Augusta, GA should a radioactive mishap occur within the city. Where is there a projected cost estimate for shipping spent fuel? Where are there estimates for on-site storage facilities should a permanent repository not be forthcoming? Although the federal government says such a facility will be in place by 1998, there are many doubts about this.

The cumulative radiological doses referred to in section 5.9.3.1 are misleading because they are based on the dubious practice of calculating possible millirems of radiation exposure from an accident and multiplying these values by the possibility of an accident happening. Such an approach appears to be standing operating procedure for EIS's prepared by DOE and NRC, but it is a deception for those who are unaware of how these figures are manipulated.

We would appreciate responses to the concerns expressed above.