



United States Department of the Interior

OFFICE OF THE SECRETARY  
WASHINGTON, D.C. 20240

In reply refer to:  
PEP ER 73/1349

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Dear Mr. Muller:

Thank you for your letter of September 25, 1973, transmitting copies of the applicant's environmental report for the Greenwood Energy Center, Units 2 and 3, St. Clair County, Michigan.

Our comments are presented according to the format of the statement or according to subject.

## Groundwater

According to the applicant there are 265 private wells within 3 miles of the site; all domestic water within three miles is derived from wells; groundwater is found approximately 10 to 25 foot depth; and the plant foundation is to be approximately 30 feet deep. It must therefore be concluded that dewatering will be necessary for construction of the foundation. The applicant should define the depth and location of those wells within 1 mile of the plant and address the effect dewatering may have on them. The applicant also states on page 2.2-17 that "Section 2.5 contains details concerning the wells within 3 miles," but this section does not include the referenced data.

## Recreational Opportunities

While the environmental report contains information on public outdoor recreation facilities near the Greenwood Energy Center site, the discussion is very brief and is limited to facilities within approximately 10 miles of the site. The report indicates no information on projected deficiencies in outdoor recreation opportunities for the Detroit metropolitan area. A Michigan State Comprehensive Outdoor Recreation Plan has been prepared by the State in order that Michigan may be eligible to participate in the



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Land and Water Conservation Fund program administered by the Bureau of Outdoor Recreation, Department of the Interior. Planning Region I (which includes St. Clair, Wayne, Macomb, Oakland, Livingston, Washtenaw, and Monroe Counties) is projected in the Plan to have a deficiency of 29,302 picnic tables, 1,454 camp sites, and 1,440 miles of trails by 1985.

The applicant apparently has no plans to permit public recreational use of the nearly 3,200 acres not needed for actual plant development. The environmental report indicates that this acreage will be kept, as much as possible, in its natural state. This land, much of it wooded, has potential for such public recreation activities as picnicking, hiking, camping, and nature study. The existence of this much land within less than a 1-hour driving time of Detroit represents a significant opportunity for the utilization of the area for public recreation. We encourage the applicant to develop a land use plan for its unused acreage and to make at least a portion of the site available to an appropriate State or local unit of government for recreational use. The land use plan and public recreation opportunities which the applicant may plan to provide should be included in the draft statement being prepared for this project.

#### Fauna

The environmental report indicates that fauna displaced from the Greenwood Energy Center site by construction activities would relocate in undisturbed areas on and off the site and would return after construction has ended. It should be noted that the undisturbed habitat adjacent to the construction activities may already be at full carrying capacity. Since 445 acres of the site would be developed and not available as habitat, the loss of some of the displaced fauna could occur.

#### Blowdown System

The blowdown of about 31 cfs is pumped via a steel pipeline to the Black River. While section 3.4.1.5.2 states this pipe will be 36-inch diameter, paragraph 5.1.1 states it will be of 24-inch diameter. This discrepancy should be resolved.

The applicant has applied a dilution factor of 5000 to blowdown wastes on the premise that the only water users downstream are from the St. Clair River (annual average flow approximately 200,000 cfs). The distance from the plant discharge on the Black River to the St. Clair River is 22 miles. While there are presently no known users of water from the Black River, there is the potential for such use, especially since the blowdown of 31 cfs will be several times minimum natural flows. We believe a conservative dilution factor would be zero, not 5000, particularly since the applicant does calculate the maximum individual exposure on this basis on page 5A-23.

We hope these comments will be helpful to you in the preparation of the environmental impact statement.

Sincerely yours,

Acting  
Deputy Assistant

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Secretary of the Interior

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