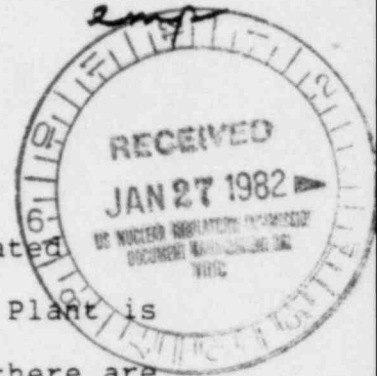


DOCKET NO. 50-537  
STATEMENT OF EDWARD E. C. CLEBSCH\*  
PRESENTED TO THE  
NUCLEAR REGULATORY COMMISSION  
ON JANUARY 18, 1982  
IN RESPONSE TO APPLICANTS'  
EXEMPTION REQUEST UNDER  
10 CFR §50.12

'82 JAN 22 P4:18



The Site Preparation Activities Report, dated November 1981, for the Clinch River Breeder Reactor Plant is obviously a carefully prepared document. However, there are some serious shortcomings.

Wherever environmental impacts are discussed, they are treated as just that, without any qualifying words that they are negative, adverse, or that they may be mitigated. Attempts to mitigate environmental impacts are implicit in many places but are not identified in crisp and critical language.

On p. 2-33, the statements concerning the area disturbed by site borings gloss over the fact that the site borings were made in erodable, clayey soils on steep slopes with steep grades between the actual boring platforms. By the time the necessary timber was cleared and the necessary borings were made it looked as if a war had been fought on the site.

\*My qualifications are attached as Tab 1 to this Statement.

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As exemplified by material on p. 3-1, the justification for the additional acreages to be disturbed and for the additional river water usage and so on, are not to be found. Figure 3-2 on p. 3-5 shows the layout of the permanent main control lines in the proposed plant. They include a water line from the Bear Creek Water Plant. The route of the water line between the plant and the water plant is nowhere divulged. The logical route for it (air line) would take it through study area L'. Certainly the development of the water main cannot be done without disturbance, and I find no treatment of the nature or magnitude of the disturbance nor how it will be mitigated. In like vein, the location of the sewage plant discharge line is nowhere shown, nor is the way in which sewage will be discharged to the receiving water body, Clinch River, detailed.

In the initial opening of the planned quarry development, clearing and stockpiling of soil and topsoil material will certainly initiate a siltation problem. It is not dealt with. The question of whether or not there will be discharge from the quarry into the Clinch River is not treated, where that discharge will take place is not shown, nor is any control over the discharge treated.

It is of interest to note that when a reduction of planned dredging from 19,000 cu. yds. to 11,000 cu. yds. (p.

4-7) it is "substantially less" but, as on p. 3-1, when increases in land area disturbed, excavation volume (almost doubled), a longer railroad, more water use, etc. are planned, "the total area of permanently disturbed land . . . is comparable to those values used in the FES." After all, the change from 195 to 260 acres of disturbance is a ratio of 1.33 increase. The quarried area, to be increased from 25 to 45 acres is, in ratio, substantial.

On p. 4-10 it is noted that the soil in the plant area is not suitable for agriculture. If not, then why was so much land converted from cleared land to pine plantations when the land was originally acquired by the Atomic Energy Commission and its predecessors in the 1940's?

It is noted on p. 4-20 that the natural features of the terrain "will be preserved as much as possible." It is further noted at that point that clearing plans will be coordinated to avoid indiscriminate clearing and to provide screening of the construction area. Commendable, if it happens. It is a long way between an architectural team and an engineering team and the people who do land clearing. Such a general promise has too many hedged words in it and gives no full assurance that the work will be carried out in that way. It is, after all, possible to make limits of clearings on maps which become hard copy in the hands of engineers and bulldozer drivers.

Although it is reassuring to know that silt ponds will be strategically located to reduce problems of siltation into the Clinch River, nowhere is the capacity of those ponds detailed. Will they indeed accommodate the 100 year floods which can be devastating even in intermittent streams?

On p. 4-28, no. 16 among the impact control measures states that the fire prevention and control plan will be developed and applied. Why should that be put off until the future? Why shouldn't the fire prevention and control plan exist now? Is our ability to plan such so poor that it cannot be done until activities are further along than at present?

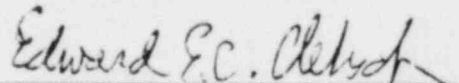
No. 17 in the same list assures us that on-the-ground inspections of species and community locations of critical ecological elements will be made semi-annually, but the detailing of inspectors and their competencies are not dealt with.

By the same token, in no. 19 of the same list, work schedules will be staggered with those of other plants if needed. Certainly traffic flow rates must be very well known in the vicinity of the Oak Ridge National Laboratory and the Gaseous Diffusion Plant. The statement is simply not detailed enough at the present time; the effort is commendable.

Similarly under no. 20 in the same list the phrase, "unless there is evidence," is not fully satisfying. Who is responsible for providing that evidence? Who makes the judgment about whether or not fish spawning will be adversely affected?

On p. 5-1, it is stated that the 1,364 acre peninsula including the 260 acres involved in site preparation is presently zoned for industrial purposes. The DOE forest management activities have already resulted in removal of the majority of harvestable trees due to considerations not associated with project activities. Certainly some of the plantations have been harvested and certain other areas either have been clear-cut or are planned for clear-cutting. I think it is simply not true that most of the harvestable trees on the whole site have been harvested. Otherwise, why would the study areas that are designated even on maps included in this document (Figure 2-8) be designated?

In summary, while the document discusses all of the broad categories which might be of concern to reviewers, there are disturbing omissions of detail and several commissions of error.

  
Edward E. C. Clebsch