

Exelon Nuclear
200 Exelon Way
Kennett Square, PA 19348

www.exeloncorp.com

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Rules and Directives
E-107
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August 27, 2002

Chief
Rules and Directives Branch
Mailstop T-6D 59
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Comments Concerning Draft Plant-Specific Supplement 10 to the Generic Environmental Impact Statement Regarding Peach Bottom Atomic Power Station

Dear Sir:

This letter is being submitted in response to the NRC's request for comments concerning the draft plant-specific Supplement 10 to NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants," regarding the renewal of operating licenses for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, for an additional 20 years of operation.

Exelon Generation Company, LLC appreciates the opportunity to comment on this draft Supplement 10 to NUREG-1437. We agree that the adverse environmental impacts of license renewal for PBAPS are not so great that preserving the option of license renewal for energy planning decisionmakers would be unreasonable.

Specific comments on draft Supplement 10 to NUREG-1437 are provided in Attachment 1.

If you have any questions, please do not hesitate to contact us.

Very truly yours,



Michael P. Gallagher
Director, Licensing & Regulatory Affairs
Mid-Atlantic Regional Operating Group

Enclosures: Attachment 1

Template = ADM-013

E-RIDS = ADM-03

Att = D. Wheeler (DXW)
A. Beranek (HFB)

ATTACHMENT 1

Comments on Draft Supplement 10 to NUREG-1437

Attachment 1

| Number | Location (pg/line) | What is in DEIS | What should be in DEIS | Why the change |
|--------|--------------------|--|---|---|
| 1 | 1-11 / 4,7 | Excelon | Exelon | Spelling |
| 2 | 2-7 / 18 | The operation is infrequent ... | This dredging operation is ... | English |
| 3 | 2-7 / 29, 32, 34 | 'rocket' | This term should be deleted. | The term 'rocket' is a colloquial term that does not come from product literature. |
| 4 | 2-6 / 25 | Conowongo | Conowingo | Spelling |
| 5 | 2-11 / 17 | ... water storage tank. | ... water storage tank, and Torus dewatering tank. | The fourth tank is not named properly. |
| 6 | 2-19 / 12 | ... uses an ammonium chloride-based molluscide ... | uses an Quaternary-amine-based molluscide ... | Correction to what is used. |
| 7 | 2-21 / 38 | ... a consortium of Federal, regional, ... | a consortium of utilities and Federal, regional, ... | The consortium also included utilities. |
| 8 | 2-37 / 2, 8 | emission stacks | emission stack | There is only one off-gas stack visible at Peach Bottom. |
| 9 | 2-37 / 8 | There is no visible plume ... | There is no visible vapor plume ... | Clarify that the plume that is being talked about is a water vapor plume. |
| 10 | 2-43 / 24 | and railroads) were | and railroads, etc.) were | These taxes were collected from more than just the utilities shown. |
| 11 | 2-47 / 39 | NRC is consulting with the FWS. | NRC has consulted with the FWS. | Consultation has already taken place. |
| 12 | 4-15 / 13-15 | The designed operation criteria are maintained in part by removal of sediments that are deposited in the canal. Maintenance of the designed depth for the intake canal helps ensure that approach velocities at the screens meet criteria. | These sentences should be deleted. | The impingement criteria are maintained at the outer intake structure. The intake canal, and the sediment removal described here, follow the intake structure and, as such, have no bearing on maintaining the intake velocities necessary to reduce impingement. |
| 13 | 4-15 / 19 | NPDES Permit PA00097733 | NPDES Permit PA 0009733 | Correction to the number on the permit. |
| 14 | 4-17 / 9 | Five mechanical draft cooling towers ... | Three mechanical draft cooling towers are located on berms... | While it is true that five towers were built, the permit now allows for three towers. Since three towers are allowed by permit, there are now three towers standing. |
| 15 | 4-34 / 33 | Hisroric | Historic | Spelling. |

| Number | Location (pg/line) | What is in DEIS | What should be in DEIS | Why the change |
|--------|--------------------|--|---|--|
| 16 | 4-36 / 24-25 | The applicant should reflect the aforementioned in its licensing basis commitments and, ... | | While Exelon has stated that it did not anticipate any additional land disturbances, or major structural modifications, or maintenance activities beyond previously disturbed areas as a result of license renewal, these were not licensing basis commitments. If it was determined that any of these areas needed to be addressed as a result of license renewal, then the proper Federal, State, and local agencies would be consulted prior to the activity. |
| 17 | 4-36 / 26 | ... not have an effect effect on any ... | ... not have an effect on any ... | Remove duplicate wording. |
| 18 | 4-36 / 35-36 | Given the commitments of the applicant to avoid future disturbances and to control access to lands it manages, ... | Given the commitments of the applicant to limit land disturbances in support of license renewal, ... | Exelon has committed in letters to appropriate agencies, to limit maintenance activities to previously disturbed areas and it has stated that it did not anticipate any additional land disturbances in support of license renewal. No commitments were made to avoid all future land disturbances nor to control access to lands it manages. |
| 19 | 4-38 / 6-10 | The listing of counties is not correct. | For counties entirely in the 50 mile zone, delete Kent County DE, and add New Castle County DE. For counties partially in the 50 mile zone: add Kent County DE. | Correction to the proper information. |
| 20 | 4-38 / 22 | ... criteria, Table 4-8 indicates ... | ... criteria, Figure 4-1 indicates ... | Correction to the proper graphic. |
| 21 | 4-39 / Map | Maryland Counties include Kent and Queen Annes. | Maryland Counties include Queen Anne, but not Kent. | Spelling and correction to the proper information. |
| 22 | 4-45 / 30-31 | ... and its independent analysis, and pending the outcome of consultation with the FWS, it ... | ... and its independent analysis, it ... | Delete the pending consultation with FWS since that has already occurred. |
| 23 | 4-45 / 34-35 | Therefore, it is the staff's preliminary determination... | Therefore, it is the staff's determination ... | Consultation with FWS has been completed. |
| 24 | 4-48 / 38 | BEIR | Biological Effects of Ionizing Radiation (BEIR) | Spelling of acronym at first usage. |

| Number | Location (pg/line) | What is in DEIS | What should be in DEIS | Why the change |
|--------|----------------------------|---|--|---|
| 25 | 4-51 / 13 | ... isptope ... | ... isotope ... | Spelling |
| 26 | 4-51 / 35 | Considerable of technical literature ... | A considerable amount of literature ... | English |
| 27 | 4-58 / 12 | Units w and E...DPR44 and Dpr-56 | Units 2 and 3...DPR-44 and DPR-56 | Spelling |
| 28 | 6-6 / 17-21 6-8 / 29-30 | On February 15, 2002, subsequent to the ...This change in regulatory status does not cause the staff to change its position.... | On July 23, 2002, the President signed into law House Joint Resolution 87 designating Yucca Mountain as the repository for spent nuclear fuel. | Change in status of the Yucca Mountain project. |
| 29 | 8-38 / 37 | ... construc-tion ... | ... construction ... | Spelling |
| 30 | 8-55 / 7 | Pennsylvania Power & Light Company (Exelon) | Exelon Generation Company, LLC (Exelon) | Spelling |
| 31 | F-2 / 24 | A.1 | F.1 | Spelling |