



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
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Chief, Rules Review and Directives Branch  
U.S. Nuclear Regulatory Commission  
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RECEIVED  
2002 SEP 18 PM 2:43  
Rules and Directives  
Branch  
USNRC

Re: Generic Environmental Impact Statement for License Renewal of Nuclear Power Plants;  
Supplement 10 Peach Bottom Atomic Power Station, Units 2 and 3. NUREG-1437

Dear Sir/Madam:

In accordance with the National Environmental Policy Act of 1969 and Section 309 of the Clean Air Act, the Environmental Protection Agency (EPA) has reviewed the Generic Environmental Impact Statement (GEIS) for License Renewal of Nuclear Power Plants; Supplement 10 Peach Bottom Atomic Power Station, Units 2 and 3. EPA has assigned the GEIS a rating of LO-1 (Lack of Objections / Adequate), which indicates that we have no objections to the proposal and that the GEIS adequately addressed the environmental impacts of the proposed alternative. General comments and a copy of EPA's ranking system are enclosed for your information.

Thank you for the opportunity to review and comment on this project. If you need additional assistance the staff contact for this project is William Arguto, he can be reached at 610-814-3367.

Sincerely,

William Hoffman, Acting Director  
Office of Environmental Programs

Enclosures



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Customer Service Hotline: 1-800-438-2474

Template = ADM-013

F-RIDS = ADM-03  
add = D. Wheeler (DXW)  
H. Beranek (AFB)

Re: Generic Environmental Impact Statement for License Renewal of Nuclear Power Plants;  
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General Comments:

Please elaborate on the term "staff" used frequently throughout the EIS. Specifically, the relationship of the Staff to the NRC and Exelon.

Are Emergency Planning and Community Right to Know ( EPCRA )313 reporting requirements considered or are any of the EPCRA requirements applicable to this supplement.

Is there any information contained in document that is sensitive or classified, that should be removed or made available through different means?

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Section 2.2.3 - Are there any storm water control measures or requirements that are considered in water quality or resource issues.

Section 4.1 - Accumulation of contaminants in Sediment, Page 4-6. Is there routine monitoring of sediments to assess changes in conditions.

Section 4.1.1 - Water Use Conflicts - Are drought conditions incorporated into water use conflict planning. Minimum monthly average flows are discussed but not discrete significant events or worse case conditions.

Section 4.1.2 - A 1977 NPDES permit is referenced and the best technology available for the intake structure for minimizing adverse environmental impacts. Although subsequent permit reviews have required no further entrainment studies is this still the best technology available?

Section 4.2.1 Electromagnetic fields, acute effects. - Are there any considerations for anticipating what would trigger a concern for future effects during the license renewal term? For example, if additional transmission lines are added in the area will it change the conclusion of this section.

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## Environmental Impact Statement (EIS) Rating System Criteria

### RATING THE ENVIRONMENTAL IMPACT OF THE ACTION

**LO (Lack of Objections)** - The review has not identified any potential environmental impacts requiring substantive changes to the preferred alternative. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposed action.

**EC (Environmental Concerns)** - The review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact.

**EO (Environmental Objections)** - The review has identified significant environmental impacts that should be avoided in order to adequately protect the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). The basis for environmental Objections can include situations:

1. Where an action might violate or be inconsistent with achievement or maintenance of a national environmental standard;
2. Where the Federal agency violates its own substantive environmental requirements that relate to EPA's areas of jurisdiction or expertise;
3. Where there is a violation of an EPA policy declaration;
4. Where there are no applicable standards or where applicable standards will not be violated but there is potential for significant environmental degradation that could be corrected by project modification or other feasible alternatives; or
5. Where proceeding with the proposed action would set a precedent for future actions that collectively could result in significant environmental impacts.

**EU (Environmentally Unsatisfactory)** - The review has identified adverse environmental impacts that are of sufficient magnitude that EPA believes the proposed action must not proceed as proposed. The basis for an environmentally unsatisfactory determination consists of identification of environmentally objectionable impacts as defined above and one or more of the following conditions:

1. The potential violation of or inconsistency with a national environmental standard is substantive and/or will occur on a long-term basis;
2. There are no applicable standards but the severity, duration, or geographical scope of the impacts associated with the proposed action warrant special attention; or
3. The potential environmental impacts resulting from the proposed action are of national importance because of the threat to national environmental resources or to environmental policies.

### RATING THE ADEQUACY OF THE ENVIRONMENTAL IMPACT STATEMENT (EIS)

**1 (Adequate)** - The draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**2 (Insufficient Information)** - The draft EIS does not contain sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the proposal. The identified additional information, data, analyses, or discussion should be included in the final EIS.

**3 (Inadequate)** - The draft EIS does not adequately assess the potentially significant environmental impacts of the proposal, or the reviewer has identified new, reasonably available, alternatives, that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. The identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. This rating