

## Letter K, page 1



M. S. Tuckman  
Executive Vice President  
Nuclear Generation

**Duke Power**  
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August 9, 2002

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

Subject: Comments on draft plant-specific Supplement 9 to NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Power Plants" Catawba Nuclear Station, Docket Nos. 50-413 and 50-414

By letter dated June 13, 2001, Duke Energy Corporation (Duke) submitted an Application to Renew the Facility Operating Licenses of McGuire Nuclear Station and Catawba Nuclear Station (Application). The staff has reviewed the information provided in the Environmental Report contained in the Application as well as the information provided in Duke letters dated February 1 and 8, 2002. By letter dated May 14, 2002, the staff forwarded a copy of the draft plant-specific Supplement 9 to NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Power Plants" for McGuire and provided Duke the opportunity to submit comments. Accordingly, please find Duke comments on draft Supplement 9 to NUREG-1437.

In addition to providing comments on the draft Supplement 9, Duke is also in the process of reviewing the conclusions contained in Section 5.2.7 of the draft Supplement 9. In this section, the staff concluded that two of the severe accident mitigation alternatives (SAMAs): one related to hydrogen control in SBO sequences is cost beneficial under certain assumptions, which are being examined in connection with the resolution of GSI-189, "Susceptibility of Ice-Condenser and Mark III Containments to Early Failure from Hydrogen Combustion During a Severe Accident" and a second SAMA related to the installation of flood protection around the 6900/4160 volt transformers. Duke is in the process of reviewing both of these SAMA and has provided its position in a separate letter dated August 8, 2002.

If there are any questions, please contact either Bill Miller at (704) 373-7900 or Bob Gill at (704) 382-3339.

Very truly yours,

*M. S. Tuckman*  
M. S. Tuckman

Attachment

AD85

## Letter K, page 2

U.S. Nuclear Regulatory Commission  
Document Control Desk  
August 9, 2002  
Page 2

Affidavit

M. S. Tuckman, being duly sworn, states that he is Executive Vice President, Nuclear Generation Department, Duke Energy Corporation; that he is authorized on the part of said Corporation to sign and file with the U. S. Nuclear Regulatory Commission the attached comments on draft plant-specific Supplement 8 to NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Power Plants," and that all the statements and matters set forth herein are true and correct to the best of his knowledge and belief. To the extent that these statements are not based on his personal knowledge, they are based on information provided by Duke employees and/or consultants. Such information has been reviewed in accordance with Duke Energy Corporation practice and is believed to be reliable.

*M. S. Tuckman*

M. S. Tuckman, Executive Vice President  
Duke Energy Corporation

Subscribed and sworn to before me this 9<sup>th</sup> day of August 2002.

*Mary P. Nelson*  
Notary Public

My Commission Expires:

Jan 22, 2006

**Attachment 1**

**Comments on Draft Plant-Specific Supplement 9 to NUREG-1437,  
“Generic Environmental Impact Statement for License Renewal of Nuclear  
Power Plants”**

**Catawba Nuclear Station, Units 1 and 2**

**Attachment 1**  
**Comments on Draft NUREG-1437, Supplement 9**  
**Catawba Nuclear Station, Units 1 and 2**

**Chapter** Executive Summary  
**Section** Not Applicable

K-01

Comment Number	Page	Line	Comment
1	xix	12-14	The staff's conclusion statement contained in these lines contradicts the staff conclusion statement contained in Section 5.2.7, page 5-28, lines 20-21.

**Chapter** 1.0 Introduction  
**Section** 1.5 Compliance and Consultations

K-02

Comment Number	Page	Line	Comment
2	1-9	8	From Table 1-1, under Column reading “Permit Expiration or Consultation Date”:  The permit expiration date is listed as “April 30, 2006”.  The NPDES permit issue date was April 30, 2001, however the permit was not issued until well into the 5-year cycle. Therefore the expiration date on the permit is not the full 5 years from date of issue.  Correct the permit expiration date to be “June 30, 2005”.

**Chapter** 2.0 Description of Nuclear Power Plant and Site and Plant Interaction with the Environment  
**Section** 2.1.2 Reactor Systems

K-03

Comment Number	Page	Line	Comment
3	2-4	38	Line 38 should be revised to state: “...5.0 percent by weight uranium-235.”

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*Attachment 1  
Comments on Draft NUREG-1437, Supplement 9  
Catawba Nuclear Station, Units 1 and 2*

**Chapter** 2.0 Description of Nuclear Power Plant and Site and Plant Interaction with the Environment  
**Section** 2.1.7 Power Transmission Systems

K-04

Comment Number	Page	Line	Comment
4	2-14	14	The term "conservation easements" should be replaced with "protection of rare species". Duke does not currently have conservation easements with SCDNR for transmission ROWs.

**Chapter** 2.0 Description of Nuclear Power Plant and Site and Plant Interaction with the Environment  
**Section** 2.2.1 Land Use

K-05

K-06

Comment Number	Page	Line	Comment
5	2-14	34	"4916 ha (12,139 ac)" should read "4,917 ha (12,149 ac)"
6	2-14	35	The statement "Full pond was achieved in 1904..." is somewhat misleading. Construction of a much smaller dam was completed in 1904. This dam was completely covered by the current and much larger Wylie dam which resulted in a significantly larger reservoir.  Change the statement to read: "The lake was initially impounded in 1904. Present full pond was obtained in 1924 with an increase in the dam height.
7	2-16	1	"Duke owns the land that underlays the lake..." is not entirely correct.  Change the statement to read: "Duke either owns the land under the lake or owns flood rights to the land under the lake".
8	2-16	9	The fenced cemetery referenced as part of the site is not part of Catawba Nuclear site. The site is owned and operated by the Concord Cemetery Association.

K-07

K-08

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*Attachment 1  
Comments on Draft NUREG-1437, Supplement 9  
Catawba Nuclear Station, Units 1 and 2*

**Chapter** 2.0 Description of Nuclear Power Plant and Site and Plant Interaction with the Environment  
**Section** 2.2.8.1 Housing

K-09

Comment Number	Page	Line	Comment
9	2-27	24-25	From Table 2-4, under Column reading "Number of Personnel": Currently reads: Other - NC 95 Other - SC 96  In order to correctly reflect the number counts as given in Table 2-5, change to:  Other - NC 112 Other - SC 79

**Chapter** 2.0 Description of Nuclear Power Plant and Site and Plant Interaction with the Environment  
**Section** 2.2.8.2 Public Services

K-10

Comment Number	Page	Line	Comment
10	2-32	24-25	Lines Read: "There are 24 counties within the 80-km (50 mi) radius of the Catawba site: 13 in South Carolina and 10 in North Carolina. The 23-county area is served by 3 major interstate freeways."  Correct the sentences to read: "There are 24 counties within the 80-km (50 mi) radius of the Catawba site: 11 in South Carolina and 13 in North Carolina. The 24-county area is served by 3 major interstate freeways."

Letter K, page 7

*Attachment 1  
Comments on Draft NUREG-1437, Supplement 9  
Catawba Nuclear Station, Units 1 and 2*

**Chapter** 2.0 Description of Nuclear Power Plant and Site and Plant Interaction with the Environment  
**Section** 2.2.8.4 Visual Aesthetics and Noise

Comment Number	Page	Line	Comment
K-11	11	2-36	5 "4912 ha (12,139 ac)" should read "4,917 ha (12,149 ac)"

**Chapter** 2.0 Description of Nuclear Power Plant and Site and Plant Interaction with the Environment  
**Section** 2.2.8.5 Demography

Comment Number	Page	Line	Comment
K-12	12	2-38	31 "4912 ha (12,139 ac)" should read "4,917 ha (12,149 ac)"
K-13	13	2-38	34 Duke owns eight (not nine) public recreational access locations on Lake Wylie and one additional access location immediately downstream of the lake. Of these nine access areas, only two (not 3) are leased to other operators.

**Chapter** 2.0 Description of Nuclear Power Plant and Site and Plant Interaction with the Environment  
**Section** 2.2.9.2 Historic and Archaeological Resources at Catawba

Comment Number	Page	Line	Comment
K-14	14	2-48	25 The Concord Cemetery is not located within the Catawba site, but adjacent to it. The cemetery is owned and operated by the Concord Cemetery Association.
K-15	15	2-48	37 The Concord Cemetery is not located within the Catawba site, but adjacent to it. The cemetery is owned and operated by the Concord Cemetery Association.

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*Attachment 1  
Comments on Draft NUREG-1437, Supplement 9  
Catawba Nuclear Station, Units 1 and 2*

**Chapter** 2.0 Description of Nuclear Power Plant and Site and Plant Interaction with the Environment  
**Section** 2.2.10 Related Federal Project Activities and Consultations

Comment Number	Page	Line	Comment
K-16	16	2-49	22 Line Reads: "This lake was formed by impounding the water of the Catawba River, and full pond was achieved in 1904."  Correct the sentence to read: "This lake was formed by impounding the water of the Catawba River in 1904."
K-17	17	2-49	24 "4912 ha (12,139 ac)" should read "4,917 ha (12,149 ac)"

**Chapter** 4.0 Environmental Impacts of Operation  
**Section** 4.1.2 Microbiological Organisms (Public Health)

Comment Number	Page	Line	Comment
K-18	18	4-14	40-41 Statement reads: Based on Catawba-specific experience, a review of available technical literature on thermophilic organisms, and the fact that there is little heated  This sentence is incomplete.

Attachment 1  
Comments on Draft NUREG-1437, Supplement 9  
Catawba Nuclear Station, Units 1 and 2

Chapter 5.0 Environmental Impacts of Postulated Accidents  
Section 5.2.2.1 Duke's Risk Estimates

Comment Number	Page	Line	Comment
K-19	5-6	20	5.8E-05/ry should be 5.8E-05/yr  Duke's reported risk estimates are base on a calendar year basis, not a reactor year basis. The capacity factor used in the PRA is 0.9.
K-20	5-6	25 2 cases	"per reactor-year" should be "per year"
K-21	5-7	17	Table 5-3 - Heading "Frequency (per reactor-year)" should be Frequency (per year)
K-22	5-8	23	"reactor-year" should be "year"
K-23	5-8	26	"per reactor-year" should be "per year"
K-24	5-9	2	"per reactor-year" should be "per year"
K-25	5-9	3	"per reactor-year" should be "per year"

Chapter 5.0 Environmental Impacts of Postulated Accidents  
Section 5.2.2.2 Review of Duke's Risk Estimates

Comment Number	Page	Line	Comment
K-26	5-11	10	"per reactor-year" should be "per year"

Attachment 1  
Comments on Draft NUREG-1437, Supplement 9  
Catawba Nuclear Station, Units 1 and 2

Chapter 5.0 Environmental Impacts of Postulated Accidents  
Section 5.2.3.1 Process for Identifying Potential Design Improvements

Comment Number	Page	Line	Comment
K-27	5-12	25	"per reactor-year" should be "per year"
K-28	5-12	29	"per reactor-year" should be "per year"
K-29	5-14		Table 5-5 Footnote (a) "per reactor-year" should be "per year"
K-30	5-14		Table 5-5 Footnote (b) "per reactor-year" should be "per year"
K-31	5-15	10	Table 5-6 - The cost of enhancement provided by Duke for the back-up power to the igniters (\$540,000) is a per unit cost and should not be divided by 2.  One of the major cost categories for the candidate modification is in the installation labor, primarily pulling cables. It was judged that finding a location for the diesel that would allow it to serve either unit would dramatically increase the cable pulling cost component. As such, it was judged that having a diesel for each unit would be less expensive (given the low cost of the hardware) than pulling cables to both units from a single location.
K-32	5-15	22	Table 5-6 - Delete Footnote (c)

Chapter 5.0 Environmental Impacts of Postulated Accidents  
Section 5.2.4 Risk Reduction Potential of Design Improvements

Comment Number	Page	Line	Comment
K-33	5-17	28	"per reactor-year" should be "per year"
K-34	5-17	29	"per reactor-year" should be "per year"
K-35	5-17	35	"per reactor-year" should be "per year"

*Attachment 1  
Comments on Draft NUREG-1437, Supplement 9  
Catawba Nuclear Station, Units 1 and 2*

**Chapter** 5.0 Environmental Impacts of Postulated Accidents  
**Section** 5.2.5 Cost Impacts of Candidate Design Improvements

Comment Number	Page	Line	Comment
K-36	5-19	17	“\$205,000 per site” should be “\$205,000 per unit” see comment 28
K-37	5-19	24	“\$540,000 per site” should be “\$540,000 per unit” see comment 28
K-38	5-19	27-29	The sentence, “In order to provide ...” should be deleted as it is not appropriate to divide these costs by 2.
K-39	5-19	36-38	The sentence, “Duke further noted that ...” should be modified. The discussion that Duke provided relative to powering the air-return fans was in the context of powering the igniters. The mixing afforded by the fans may or may not be significant to the effectiveness of PARs, but in any case Duke provided no position on the need for fans when using PARs.

**Chapter** 5.0 Environmental Impacts of Postulated Accidents  
**Section** 5.2.6.1 Duke Evaluation

Comment Number	Page	Line	Comment
K-40	5-22	34	3.81E+08 should be 3.1E+08 see page 12 of Attachment H

*Attachment 1  
Comments on Draft NUREG-1437, Supplement 9  
Catawba Nuclear Station, Units 1 and 2*

**Chapter** 5.0 Environmental Impacts of Postulated Accidents  
**Section** 5.2.6.2 Staff Evaluation

Comment Number	Page	Line	Comment
K-41	5-25	14	“30 percent” should be “24 percent” See Table 5-3 of the SEIS
K-42	5-25	29	“per reactor-year” should be “per year”
K-43	5-25	30	“per reactor year” should be “per year”
K-44	5-26	3-5	The discussion concerning NUREG/CR-6427 should more accurately characterize the insights from the NUREG. This NUREG provided a simplified level 2 analysis for the purpose of investigating the importance of DCH. The conservative assumptions applied in this analysis with regard to hydrogen generation and the probability of ignition make it useful for understanding the uncertainties associated with early containment failure probabilities. The NUREG should not be interpreted as the latest information with respect to a realistic or best-estimate evaluation of the potential for early containment failure as a result of hydrogen combustion during station blackouts.
K-45	5-26	3	“per reactor-year” should be “per year”
K-46	5-26	20 2 cases	“per reactor-year” should be “per year”
K-47	5-27	5 & 9	Table 5-7 - \$270,000 should be \$540,000 and \$102,5000 should be \$205,000 The cost provided by Duke are per unit costs and should not be divided by 2
K-48	5-27	11-13	Table 5-7 - Delete Footnote (a)

Letter K, page 13

*Attachment 1  
Comments on Draft NUREG-1437, Supplement 9  
Catawba Nuclear Station, Units 1 and 2*

**Chapter** 6.0 Environmental Impacts of the Uranium Fuel Cycle and Solid Waste Management  
**Section** 6.1 The Uranium Fuel Cycle

K-49

Comment Number	Page	Line	Comment
49	6-6	25	<p>This page presents a brief chronology of events that have occurred in the area of high level waste disposal subsequent to the GEIS being published in 1996. The chronology ends at the President's recommendation in February 2002.</p> <p>While it may seem a bit odd for this type of information to be contained in an environmental document, Duke believes that the chronology should remain in the SEIS and should be updated to reflect significant events that have taken place since then. For example:</p> <p>"On April 8, 2002, Governor Guinn of Nevada issued a "Notice of Disapproval" regarding the recommendation of the President. As required by the Nuclear Waste Policy Act, the matter was then referred to the Congress. Subsequently, [insert final decision of Congress and date]."</p>

**Chapter** Chapter 8.0 Environmental Impacts of Alternatives to Operating License Renewal  
**Section** Section 8.2.2.1 Oil and Natural-Gas-Fired (Combined Cycle) Closed-Cycle Cooling System

K-50

Comment Number	Page	Line	Comment
50	8-32	23	Reference to SCDNR should be replaced with SCDHEC

Letter K, page 14

*Attachment 1  
Comments on Draft NUREG-1437, Supplement 9  
Catawba Nuclear Station, Units 1 and 2*

**Chapter** Chapter 8.0 Environmental Impacts of Alternatives to Operating License Renewal  
**Section** Section 8.2.3.1 Nuclear Power Generation - Closed-Cycle Cooling System

K-51

Comment Number	Page	Line	Comment
51	8-41	18	Reference to SCENR should be replaced with SCDHEC

**Chapter** Appendix E  
**Section** Table E-1

K-52

Comment Number	Page	Line	Comment
52	E-2	11	Expiration date of NPDES wastewater permit is 6/30/05 rather than 4/30/06.

December 2002

Letter L, page 1



United States Department of the Interior

OFFICE OF THE SECRETARY  
OFFICE OF ENVIRONMENTAL POLICY AND COMPLIANCE

Richard B. Russell Federal Building  
75 Spring Street, S.W.  
Atlanta, Georgia 30303

ER 02/438

August 13, 2002

Chief, Rules Review and Directives Branch  
U.S. Nuclear Regulatory Commission  
Mail Stop T6-D59  
Washington, DC 20555

RE: Draft Generic EIS for License Renewal of Nuclear Plants, Supplement 9, Catawba Nuclear Station, Units 1 and 2 (NUREG-1437)

Dear Sirs:

The Department of the Interior has reviewed the referenced document and we have no comments to provide at this time. If you should have any questions, I can be reached at 404-331-4524.

Sincerely,

Gregory Hogue  
Regional Environmental Officer

cc:  
FWS, R4  
OEPC, WASO

5/21/02  
67 FR 35839  
①

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7/27/02  
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NRC

Amplite = ADM-013

E-RIDS = ADM-03  
cc - James H. Wilson (JHW1)  
H. Beronek (AFB)

Letter M, page 1



GARY R. PETERSON  
Vice President  
Catawba Nuclear Station

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August 8, 2002

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

SUBJECT: Duke Energy Corporation  
Catawba Nuclear Station, Units 1 and 2  
Docket Numbers 50-413 and 50-414  
Severe Accident Mitigation Alternatives

REFERENCE: 1) Letter, USNRC to Duke Energy Corporation Dated May 14, 2002, SUBJECT: Request for Comments on the Draft Plant-Specific Supplement 9 to the Generic Draft Environmental Impact Statement Regarding Catawba Nuclear Station, Units 1 and 2.

Gentlemen:

M-01 Section 5.2.7 of Reference 1 identifies two Severe Accident Mitigation Alternatives (SAMAs): one to provide back-up power to the hydrogen igniters for Station Blackout (SBO) events and the other to install flood protection around the 6900/4160 volt transformers. The NRC staff states that since these SAMAs do not relate to adequately managing the effects of aging during the period of extended operation, they need not be implemented as part of license renewal pursuant to 10 CFR Part 54. The staff intends to pursue these two SAMAs as current operating license issues. Catawba has reviewed these two SAMAs and concurs with the NRC that these two SAMAs are not within the scope of license renewal and should be addressed separate from any license renewal proceedings. This letter provides the Catawba Nuclear Station position on these two SAMAs.

M-02 For the first SAMA, concerning the installation of back-up power to the hydrogen ignition system during a SBO event, Catawba agrees with the NRC staff that depending on the design requirements there may be a cost-beneficial modification that provides sufficient alternative power during a SBO to the hydrogen ignition system. The NRC staff has determined that this issue is sufficiently important for PWRs with ice-condenser containment and BWR Mark III containments that the NRC has made the issue a Generic Safety Issue (GSI), GSI-189 - Susceptibility of Ice-Condenser and Mark III Containments to Early Failure from Hydrogen Combustion During a Severe Accident. As part of the resolution of GSI-189, the NRC is evaluating potential

www.duke-energy.com

Appendix A

L-01

A-103

NUREG-1437, Supplement 9



Letter M, page 2

U.S. Nuclear Regulatory Commission  
Page 2  
August 8, 2002

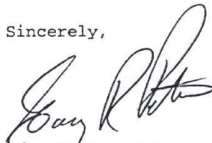
improvements to hydrogen control provisions in ice-condenser plants to reduce their vulnerability to hydrogen-related containment failures during a SBO. This will include an assessment of the costs and benefits of various options. Catawba will evaluate various possible plant design and procedural changes to address this issue. However, since this issue is being pursued by the NRC as a generic issue for ice-condenser and BWR Mark III containments, Catawba will monitor the NRC resolution of GSI-189 as a current operating license issue.

M-03

For the second SAMA, concerning the installation of flood protection around the 6900/4160 volt transformers, Catawba also agrees with the NRC staff conclusion in Reference 1. Catawba is currently in the process of designing and scheduling the installation of flood protection for the 6900/4160 volt transformers for Units 1 and 2. The current schedule is to have this modification completed by March 31, 2005. Catawba will keep the NRC Staff informed on the progress of this modification and any changes to the schedule. This is the only regulatory commitment contained in this letter.

Duke Energy and Catawba have been actively involved since before 1988 in the development of plant-specific probabilistic risk assessments (PRA), individual plant examinations (IPE/IPEEE), and component/system reliability studies to evaluate severe accidents at Catawba. Risk insights from various Catawba risk assessments have been identified and implemented to improve both the design and operation of the plant. These changes to the plant have been prioritized based on risk significance and implemented accordingly. The implementation of such improvements has reduced the risk associated with major contributors identified by the Catawba PRA and has enhanced overall plant safety. Consideration of the two issues identified in Reference 1 continues the activities previously taken by Duke Energy to use risk insights to continuously improve the safety of Catawba Nuclear Station.

If you have any questions regarding this submittal, please contact Randall D. Hart at 803-831-3622.

Sincerely,  
  
Gary R. Peterson

RDH/s

Letter N, page 1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

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Rules and Directives Branch

5/21/02  
67 FR 30839  
(2)

August 23, 2002

4EAD

Chief, Rules Review and Directives Branch  
U.S. Nuclear Regulatory Commission  
Mail Stop T6-D59  
Washington, DC 20555-0001

SUBJECT: **Generic Draft Environmental Impact Statement for License Renewal of Nuclear Plants, Supplement 9 Catawba Nuclear Station, Units 1 & 2 CEQ No. 020204**

Dear Sir/Madam:

Pursuant to Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) reviewed the document entitled, "Draft Generic Environmental Impact Statement for License Renewal of Nuclear Plants, Regarding the Catawba Nuclear Station, Units 1 & 2, Supplement 9," NUREG-1437 (DGSEIS). We appreciate your compliance with the disclosure and public access aspects of the NEPA process. The purpose of this letter is to provide you with the results of our review of the DGSEIS.

N-01

Rad waste, which is usually considered a "low volume waste stream," is any waste stream (i.e., ion exchange regenerate, etc.), that has a radioactive component. EPA Region 4's review of this DGSEIS found no issues related to nuclear or environmental radiation which were significant enough to comment on or to ask for clarification. However, EPA does not regulate the radioactive component of any waste streams; that is the responsibility of the Nuclear Regulatory Commission (NRC). The NRC regulates the alpha, beta, and gamma radioactivity of all the waste streams at nuclear plants.

N-02

Based on the sufficiency of information, alternatives evaluation, and potential environmental impacts over which EPA has authority, the document received a rating of "EC-1," (Environmental Concerns - Adequate Information). That is, the review identified environmental impacts which should be avoided, in order to fully protect the environment. Specifically, the possibility of environmental impacts resulting from a release due to a severe accident are a concern. However, we understand that NRC along with DOE, FEMA, and EPA are taking additional steps to ensure that nuclear plants are prepared for such an occurrence. In addition, while the DGSEIS provides reasonable analysis of the proposed action and alternatives, we look forward to the inclusion of clarifying information in the Final GSEIS. Our comments are attached.

N-03

Template = ADM-013  
E-REDS = ADM-03  
BRL = H. BERNECK (AFB) ALL = JAMES H. WILSON (SHWI)

Letter N, page 2

Thank you for the opportunity to provide our comments regarding this project. If you have any questions, you may contact Ramona McConney of my staff at (404) 562-9615.

Sincerely,



Heinz J. Mueller, Chief  
Office of Environmental Assessment

Attachment

Letter N, page 3

EPA Comments on  
Generic Draft Environmental Impact Statement for  
License Renewal of Nuclear Plants, Supplement 8  
McGuire Nuclear Station, Units 1 & 2  
CEQ No. 020204

N-04

**General:** The document does not mention whether power demands on the Catawba facility are expected to change significantly from present levels during the license renewal period (up to 20 years). If consumer power needs in the service area increase significantly, please clarify how this would affect operations, particularly with regard to the cooling system, effluent release, and waste quantity.

N-05

**Water:** Section 4.5 discusses groundwater use and quality. The document (page 4-35) mentions that the facility uses <100 gpm from three existing groundwater wells (page 2-6). We note the statement on page 4-36 that "*It is impossible to reliably predict the quantity of future withdrawals and groundwater demands over the renewal term.*" A similar statement on page 4-14 is made regarding surface water withdrawals. Information regarding the anticipated growth rate in the consumer service area and other applicable factors may provide information on future power demands and consequently water needs.

N-06

**Waste Minimization:** We appreciate your commitment to reducing waste volume from the facility (page 2-12).

N-07

**Noise:** Page 2-36 states that noise from the facility is "*...noticeable but not obtrusive.*" Please clarify the decibel level.