United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
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Pao-Tsin Kuo, Program Director
License Renewal & Environmental Impacts Program
Div. of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Mr. Kuo:

The Department of the Interior (Department) has reviewed the Generic Environmental Impact Statement (GEIS) for License Renewal of Nuclear Power Plants, Supplement 14 (NUREG-1437, Supplement 14), dated June 2003, regarding the relicensing of the R.E. Ginna Nuclear Power Plant. The applicant, Rochester Gas and Electric (RG&E), proposes to renew the operating license for this facility which will expire December 18, 2009. This project is located in the Town of Ontario, Wayne County, New York.

The Nuclear Regulatory Commission (NRC) has requested comments on the GEIS which evaluates potential impacts from the relicensing of the R.E. Ginna Power Plant for an additional 20-year period.

This report of the Department is submitted for project planning purposes under the National Environmental Policy Act. Comments pursuant to the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) were previously submitted by the Department's U.S. Fish and Wildlife Service (Service) in a letter dated February 25, 2002. The Service also provided comments, in a letter dated January 6, 2003, on future project studies during the public scoping period. Additional comments may be provided pursuant to, and in accordance with, provisions of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.) in the future, if applicable, as well as other legislation.

No physical modifications are anticipated or operating changes proposed at this time to the Ginna facility, or during the 20-year term of the next license. However, the Service previously identified fish entrainment and impingement as problems associated with power plant water intake systems. The intake system of the Ginna plant is known to impinge at least 30,000 fish every year based on studies and monitoring by RG&E. In addition, studies completed more than 20 years ago indicate that approximately 89 million fish eggs and 17 million larval fish were entrained annually within the plant's cooling system.

The Environmental Report prepared for this project indicates that fish, fish eggs, and larvae entrainment and impingement have been evaluated by RG&E and that the problem is not significant. However, the Service requested additional studies be conducted at this facility to

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document existing fish mortality. The previous entrainment study was completed in 1977 and is too old to accurately reflect current conditions. Recently, the New York State Department of Conservation (NYSDEC) has directed RG&E to conduct additional studies to determine the extent of the problem. We concur with the NYSDEC that additional current information is needed to fully assess fish mortality at this project.

The Service previously suggested that RG&E evaluate the use of a filter system to minimize fish impingement and entrainment. However, no evaluation of such a system was presented within the GEIS document. A filter boom, such as the Gunderboom System, can prevent fish larvae and eggs from entering the water intake pipe. Fish larvae, eggs, and debris are removed and released downstream of the boom with small bursts of air along the length of the filter. This system is currently being used at three other major power plants in New York and has been determined to be the Best Technology Available, where its use is feasible. Again, it is recommended that RG&E fully evaluate a filter system for use at this facility and document this evaluation in the GEIS.

Shoreline erosion from waves and storm events has occurred at the eastern end of the project site. Existing protection measures have not been completely effective. However, the extent of the erosion has been limited to one or two small areas over a 30-year period. Rochester Gas and Electric should consider the use of measures other than hard structures (i.e. riprap) to control the erosion problem. Instead of hard structures, biotechnical erosion controls should be used for this project, if feasible. These measures are the most effective means to limit erosion and also provide habitat for fish, wildlife, and invertebrates. This technique uses vegetation to control erosion in a buffer between the water and upland. If hard structures are necessary, RG&E should use articulated concrete block or riprap in combination with planting erosion controlling vegetation. This vegetation should include native plant species which will benefit wildlife such as dwarf willow (*Salix cottetii*), grey dogwood (*Cornus racemosa*), silky dogwood (*Cornus amomum*), arrowwood viburnum (*Viburnum dentatum*), and other appropriate species. The use of vegetation will be more beneficial for wildlife and be more aesthetic than bare riprap.
The Department appreciates the opportunity to comment on the GEIS document. We hope these comments are useful during your project review and will continue to work with your agency during the relicensing process and completion of the GEIS.

Please contact Timothy Sullivan at the Service's New York Field Office, at 607-753-9334 if there are any questions regarding this letter.

Sincerely,

Andrew L. Raddant /s/
Regional Environmental Officer

cc: NYSDEC, Avon, NY (Environmental Permits)
EPA, Water Programs Division, New York, NY
FWS, NYFO, Cortland, NY (T. Sullivan)