



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Custom House, Room 244
200 Chestnut Street
Philadelphia, Pennsylvania 19106-2904

IN REPLY REFER TO:

12/10/03
68 FR 68955
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February 20, 2004

Rules and Directives
Branch
USNR

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Michael T. Lesar
Chief, Rules and Directives Branch
U.S. Nuclear Regulatory Commission
Mail Stop T6-D59
Washington, D.C. 20555-0001

Dear Mr. Lesar:

The U.S. Department of the Interior (Department) has reviewed the Generic Environmental Impact Statement (EIS) for License Renewal of Nuclear Plants, NUREG-1437, Draft Supplement 17 (dated December 2003), regarding Exelon Generation Company, LLC, Dresden Nuclear Power Station, Units 2 and 3, Grundy County, Illinois, and offers the following comments:

GENERAL COMMENTS

The subject license renewal does not involve any major construction, refurbishment, or physical alteration of the project area. The Generic EIS and Draft Supplement 17 adequately address the concerns of the Department regarding fish and wildlife resources. We concur with the preliminary conclusions of the U. S. Nuclear Regulatory Commission (NRC) staff with respect to the impacts of continued operations on these resources. The NRC staff has provided a Biological Assessment to the U. S. Fish and Wildlife Service (FWS), which concluded with a determination that the proposed action is not likely to adversely affect any federally listed threatened or endangered species. The FWS agrees with that determination and will be providing an official concurrence to the NRC under separate cover.

SPECIFIC COMMENTS

Page 2-42, line 31: The floodplain of the Illinois River and its contributing streams, the Des Plaines and the Kankakee, constitute a portion of the landscape that is capable of cultivation without the plow and that is occupied by riparian vegetation and fish and wetland wildlife populations. All predictive models of site location list the floodplain as a prime zone for archeological site location. While the landform and the location within the floodplain have a high potential to yield important archaeological resources, without survey data, it is difficult to

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predict the site significance and, thus, potential impacts. Likewise, past/current land disturbances may have jeopardized artifacts to an unknown degree; thus, activity in the flood plain may constitute an ongoing impact that has yet to be evaluated.

Page 2-43 line 16: Please add "Kaskaskia Illinois" Tribe.

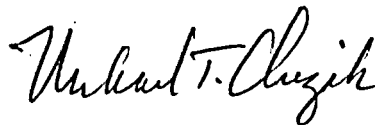
Page 2-44 line 10: Please change to "Briscoe mounds and associated habitation site."

Page 2-44 line 12: Please correct. One of the mounds was erected around 1350, the other has never been excavated.

Please continue to include the Illinois and Michigan Canal National Heritage Corridor (NHC) in all related project correspondences. The NHC address is: Executive Director, I & M Canal NHC, 15701 South Independence Boulevard, Lockport, Illinois, 60441. If you have any questions regarding the NHC, please contact Ms. Phyllis Ellin, Executive Director, I&M Canal NHC, at 815-740-2047.

We appreciate the opportunity to provide these comments.

Sincerely,



Michael T. Chezik
Regional Environmental Officer