



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

7/8/04

AUG 05 2004

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RDB received
8/16/04
8:41 am

REPLY TO THE ATTENTION OF:

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B-19J

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

Re: Generic Environmental Impact Statement for License Renewal of Nuclear Plant, Supplement 17: Dresden Nuclear Power Station, Units 2 and 3, Final Report, NUREG-1437

Dear Sir or Madam:

In accordance with Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA) has reviewed the Generic Environmental Impact Statement for License Renewal of Nuclear Plant, Supplement 17: Dresden Nuclear Power Station, Units 2 and 3 (Dresden Units 2 and 3), which is a final report. The Nuclear Regulatory Commission (NRC) developed the Generic Environmental Impact Statement (GEIS) to streamline the license renewal process on the premise that environmental impacts of most nuclear power plant license renewals are similar, in most cases. NRC develops facility-specific supplemental environmental impact statements (SEIS) for individual plants as the facilities apply for license renewal. EPA provided comments on the Dresden draft SEIS on February 24, 2004.

The Dresden Nuclear Plant is located on the banks of the Illinois River (at the confluence of the Des Plaines and Kankakee Rivers) in Grundy County, Illinois. The plant has three units. Dresden Units 2 and 3 are operating nuclear reactors and the subject of the proposed Federal action. The other unit (Dresden Unit 1) was shut down in 1978 and decontaminated in 1984. Dresden Units 2 and 3 each produces an output of 2957 megawatts thermal, and each unit has a design rating for a net electrical power output of 912 megawatts. Each unit is refueled on a 24-month cycle; this is done by refueling an alternate unit each year. The cooling system can operate in one of two modes. In the indirect open-cycle mode, once-through cooling water from the Kankakee River is used to remove heat from the main (turbine) condensers. The heated effluent is circulated through a cooling canal and pond and discharged to the Illinois River. In the closed-cycle mode, heated effluent is circulated through mechanical draft cooling towers, then recycled through the condensers with limited make-up water drawn from the Kankakee River.

The proposed Federal action is renewal of the operating licenses for Dresden Units 2 and 3. The Exelon Generation Company, LLC has submitted a permit application to the NRC to extend the

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ADM = J. H. Wilson (JHW)

operating license for Dresden Units 2 and 3 for an additional 20 years. Currently, the operating licenses for Dresden Units 2 and 3 expire on December 22, 2009 and January 12, 2011, respectively.

Based on our review of the Dresden final SEIS, we retain the concerns we raised in our February 24, 2004 letter. (In our letter we gave the draft SEIS an EC-2 rating, meaning that we had environmental concerns with the proposed action and requested additional information in the final SEIS.) Our concerns include issues related to cooling water system impacts on aquatic organisms, thermal impacts, risk estimates, information on radiological impacts, and on-site waste storage. We find the final SEIS does not adequately address these concerns. Therefore, the final SEIS does not sufficiently explain the environmental consequences of the selected alternative. Since our concerns involve changes in plant operation or changes to actual, potential, or cumulative environmental impacts, we believe they should be addressed with facility-specific information. We strongly encourage NRC to revise its responses to our concerns, in order to develop a more comprehensive and site-specific environmental document.

If you have any questions or wish to discuss any aspect of the comments, please contact Newton Ellens of my staff at (312) 353-5562.

Sincerely,



Kenneth A. Westlake, Chief
Environmental Planning and Evaluation Branch
Office of Strategic Environmental Analysis

Enclosures