AmerGen SM

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10 CFR 50.90

RS-04-157
December 17, 2004

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

Braidwood Station, Units 1 and 2
Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456 and STN 50-457

Byron Station, Units 1 and 2
Facility Operating License Nos. NPF-37 and NPF-66
NRC Docket Nos. STN 50-454 and STN 50-455

Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Limerick Generating Station, Units 1 and 2
Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352 and 50-353

Oyster Creek Nuclear Generating Station
Facility Operating License Nos. DPR-16
NRC Docket No. 50-219

Peach Bottom Atomic Power Station, Units 2 and 3
Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-277 and 50-278

Quad Cities Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254 and 50-265

Subject: Proposed Revision to Appendix B, Environmental Protection Plan (Non-Radiological) of the Facility Operating License

Reference: Letter from U. S. NRC to M. A. Krupa (Entergy Operations, Inc.), dated April 12, 2004

A001

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company, LLC (EGC) and AmerGen Energy Company, LLC (AmerGen) propose changes to Appendix B of the Facility Operating Licenses listed above. The proposed changes would retain certain elements of the Environmental Protection Plans (EPPs) and would revise others by clarifying a number of items without changing the purpose, by removing the requirement for an annual report, by updating terminology, by deleting obsolete program information, and by standardizing wording in the EPPs.

This amendment request is similar to that granted to Entergy Operations, Inc. (Entergy) for its Grand Gulf Nuclear Station, River Bend Station and Waterford Steam Electric Station on April 12, 2004.

EGC and AmerGen request approval of the proposed changes by December 30, 2005, with an amendment implementation period of within 60 days of issuance.

The proposed changes have been reviewed by the Plant Operations Review Committees at each of the stations and reviewed by the Chairman of the Nuclear Safety Review Board in accordance with the requirements of the EGC/AmerGen Quality Assurance Program.

In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (b), EGC and AmerGen are notifying the States of Illinois, Iowa, New Jersey, Maryland and the Commonwealth of Pennsylvania of this application for changes to the EPP by transmitting a copy of this letter and its attachments to the designated State Official.

Should you have any questions or require additional information, please contact Ms. Alison Mackellar at (630) 657-2817.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 17, 2004

Keith R. Jury
Director – Licensing and Regulatory Affairs
Exelon Generation Company, LLC
AmerGen Energy Company, LLC

Attachment 1: Evaluation of Proposed Changes

Attachments 2A – 2H: Mark-up of Proposed Appendix B Changes

Attachments 3A – 3H: Typed Appendix B pages with changes incorporated

bcc: Project Manager, NRR – Braidwood Station
Project Manager, NRR – Byron Station
Project Manager, NRR – Clinton Power Station
Project Manager, NRR – LaSalle County Station
Project Manager, NRR – Limerick Generating Station
Project Manager, NRR – Oyster Creek Nuclear Generating Station
Project Manager, NRR – Peach Bottom Atomic Power Station
Project Manager, NRR – Quad Cities Nuclear Power Station
Illinois Emergency Management Agency – Division of Nuclear Safety
Iowa Emergency Management Division
New Jersey Department of Environmental Protection – New Jersey Radiation Protection Programs
New Jersey Office of Emergency Management
Maryland Emergency Management Agency – Division of Nuclear Safety
Maryland Department of the Environment – Radiological Health Program
Pennsylvania Emergency Management Agency – Division of Nuclear Safety
Pennsylvania Department of Environmental Protection – Bureau of Radiation Protection
Director, Licensing and Regulatory Affairs
Manager, Licensing, Braidwood, Byron and LaSalle
Manager, Licensing, Clinton and Quad Cities
Manager, Licensing, Limerick, Oyster Creek and Peach Bottom
Regulatory Assurance Manager – Braidwood Station
Regulatory Assurance Manager – Byron Station
Regulatory Assurance Manager – Clinton Power Station
Regulatory Assurance Manager – LaSalle County Station
Regulatory Assurance Manager – Limerick Generating Station
Regulatory Assurance Manager – Oyster Creek Nuclear Generating Station
Regulatory Assurance Manager – Peach Bottom Atomic Power Station
Regulatory Assurance Manager – Quad Cities Nuclear Power Station
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ATTACHMENT 1
EVALUATION OF PROPOSED CHANGES

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ATTACHMENT 1
EVALUATION OF PROPOSED CHANGES

1.0 DESCRIPTION

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company, LLC (EGC) and AmerGen Energy Company, LLC (AmerGen) propose changes to Appendix B, Environmental Protection Plan (EPP), for the following operating licenses.

The use of the terms Environmental Technical Specifications (ETS) and Environmental Protection Plans (EPP) are plant specific and are considered equivalent terms for the purposes of this submittal.

Plant	Facility Operating License Nos.
Braidwood Station, Units 1 and 2	NPF-72 and NPF-77
Byron Station, Units 1 and 2	NPF-37 and NPF-66
Clinton Power Station, Unit 1	NPF-62
LaSalle County Station, Units 1 and 2	NPF-11 and NPF-18
Limerick Generating Station, Units 1 and 2	NPF-39 and NPF-85
Oyster Creek Nuclear Generating Station	DPR-16
Peach Bottom Atomic Power Station, Units 2 and 3	DPR-44 and DPR-56
Quad Cities Nuclear Power Station, Units 1 and 2	DPR-29 and DPR-30

The proposed changes would revise Appendix B, Environmental Protection Plan (Non-Radiological) of the Facility Operating License for each of the units listed above. The proposed changes would retain certain elements of the EPPs and would revise others by clarifying a number of items without changing the purpose, by removing the requirement for an annual report, by updating terminology, by deleting obsolete program information, and by standardizing the wording in the EPPs.

2.0 PROPOSED CHANGES

The proposed Appendix B changes for each facility are listed below.

Braidwood Station

Section	Proposed Changes
2.1	Aquatic Issues - Revised National Pollutant Discharge Elimination System (NPDES) Permit issuer to be Federal or State permitting authority.
3.1	Plant Design and Operation - Removed reference to Annual Environmental Operating Report.
3.2	Reporting Related to the NPDES Permit and State Certification - Revised reporting requirements related to NPDES Permit or State certification to only notify the NRC following approval of changes.

3.3	Changes Required for Compliance and Other Environmental Regulations - Administrative change to replace the phrase "which are required to achieve compliance with" with the phrase "that are either regulated or mandated by." An additional sentence has been added to state "however, if any environmental impacts of a change are not evaluated under other Federal, State or local environmental regulations, then those impacts are subject to the requirements of Section 3.1."
4.1	Unusual or Important Environmental Events - Inserted statement that a duplicate immediate report is not required when an event is reportable under 10 CFR 50.72.
5.2	Records Retention - Clarified requirement for log retention. Revised retention timeframe from "for the life of the station" to "until the date of termination of the operating license."
5.4.1	Routine Reports - Entire section relating to routine reports deleted.
5.4.2	Non-Routine Reports – Clarification of a "non-routine event" to be an "unusual or important environmental event."

Byron Station

Section	Proposed Changes
2.1	Aquatic Issues - Revised NPDES Permit issuer to be Federal or State permitting authority.
3.1	Plant Design and Operation - Removed reference to Annual Environmental Operating Report.
3.2	Reporting Related to the NPDES Permits and State Certification - Revised reporting requirements related to NPDES Permit or State certification to only notify the NRC following approval of changes.
3.3	Changes Required for Compliance with Other Environmental Regulations - Administrative change to replace the phrase "which are required to achieve compliance with" with the phrase "that are either regulated or mandated by." An additional sentence has been added to state "however, if any environmental impacts of a change are not evaluated under other Federal, State or local environmental regulations, then those impacts are subject to the requirements of Section 3.1."
4.1	Unusual or Important Environmental Events - Inserted statement that a duplicate immediate report is not required when an event is reportable under 10 CFR 50.72.
4.2	Environmental Monitoring - Inserted statement that the Terrestrial monitoring programs have been completed and further monitoring is not required.
4.2.1	Aerial Remote Sensing - Entire section relating to Aerial Remote Sensing deleted.
4.2.2	Confirmatory Sound Level Survey - Entire section relating to Confirmatory Sound Level Survey deleted.

5.2	Records Retention - Clarified requirement for log retention. Revised retention timeframe from "for the life of the station" to "until the date of termination of the operating license."
5.4.1	Routine Reports - Entire section relating to Routine Reports deleted.
5.4.2	Non-Routine Reports – Clarification of a "non-routine event" to be an "unusual or important environmental event."

Clinton Power Station

Section	Proposed Changes
1.0	Objectives of the Environmental Protection Plan - Removed references to facility construction.
2.1	Aquatic Issues - Revised issuer of NPDES Permit to be Federal or State permitting authority.
3.1	Plant Design and Operation - Removed reference to Annual Environmental Operating Report.
3.2	Reporting Related to the NPDES Permits and State Certification - Revised reporting requirements related to NPDES Permit or State certification to only notify the NRC following approval of changes.
3.3	Changes Required for Compliance with Other Environmental Regulations - Administrative change to replace the phrase "which are required to achieve compliance with" with the phrase "that are either regulated or mandated by." An additional sentence has been added to state "however, if an environmental impact of a change is not evaluated under other Federal, State or local environmental regulations, then the impact is subject to the requirements of Section 3.1."
4.1	Unusual or Important Environmental Events - Inserted statement that a duplicate immediate report is not required when an event is reportable under 10 CFR 50.72. Referenced communication methods (telephone, telegraph or facsimile) are deleted.
4.2	Environmental Monitoring - Revised the authorities having jurisdiction in Section 2.0 to be the Federal or State permitting authority.
5.2	Records Retention - Clarified requirement of data and log retention. Revised retention timeframe from "life of the plant" to "until the date of termination of the operating license." Deleted requirement for preoperational environmental monitoring records, procedures, data and logs.
5.4.1	Routine Reports - Entire section relating to Routine Reports deleted.
5.4.2	Non-Routine Reports – Clarification of a "non-routine event" to be an "unusual or important environmental event."

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LaSalle County Station

Section	Proposed Changes
1.0	Objective of the Environmental Protection Plan - Removed references to facility construction.
2.1	Aquatic Issues - Revised NPDES Permit issuer to be Federal or State permitting authority.
2.2	Terrestrial Issues - Inserted statement that the potential erosion effects are addressed in the regulatory requirements of the Dam Permit issued by the State permitting authority and that the NRC will rely on this State agency for regulation of these matters.
3.1	Plant Design and Operation - Removed reference to Annual Environmental Operating Report.
3.2	Reporting Related to the NPDES Permits and State Certification - Revised reporting requirements related to NPDES Permit or State certification to only notify the NRC following approval of changes.
3.3	Changes Required for Compliance with Other Environmental Regulations - Administrative change to replace the phrase "which are required to achieve compliance with" with the phrase "that are either regulated or mandated by." An additional sentence has been added to state "however, if any environmental impacts of a change are not evaluated under other Federal, State or local environmental regulations, then those impacts are subject to the requirements of Section 3.1."
4.1	Unusual or Important Environmental Events - Inserted statement that a duplicate immediate report is not required when an event is reportable under 10 CFR 50.72. Referenced communication methods (telephone, telegraph or facsimile) are deleted.
4.2	Environmental Monitoring - Inserted statement that the Environmental monitoring programs are conducted in accordance with the guidance and controls of agencies outside of the NRC.
4.2.1	Vegetative Integrity on Cooling Pond Dike - Entire section relating to Vegetative Integrity on Cooling Pond Dike deleted.
5.2	Records Retention - Clarified requirement for log retention. Revised retention timeframe from "the life of the plant" to "until the date of termination of the operating license."
5.4.1	Routine Reports - Entire section relating to Routine Reports deleted.
5.4.2	Non-Routine Reports – Clarification of a "non-routine event" to be an "unusual or important environmental event."

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Limerick Generating Station

Section	Proposed Changes
Cover and TOC	Reference to the opposite Unit has been removed from the Title on the cover page and Table of Contents (TOC).
1.0	Objectives of the Environmental Protection Plan - Removed references to facility construction.
3.1	Plant Design and Operation - Removed reference to Annual Environmental Operating Report.
3.2	Reporting Related to the NPDES Permits and State Certification - Revised reporting requirements related to NPDES Permit or State certification to only notify the NRC following approval of changes or renewals.
3.3	Changes Required for Compliance with Other Environmental Regulations – Administrative change to replace the phrase "which are required to achieve compliance with other" with the phrase "that are either regulated or mandated by." An additional sentence has been added to state "however, if any environmental impacts of a change are not evaluated under other Federal, State or local environmental regulations, then those impacts are subject to the requirements of Section 3.1."
4.1	Unusual or Important Environmental Events - Inserted statement that a duplicate immediate report is not required when an event is reportable under 10 CFR 50.72.
4.2.3	Maintenance of Transmission Line Corridors – Deleted records retention requirements for herbicide use in Transmission Corridors.
4.2.4	Noise Monitoring – Deleted historical requirements for Sound Surveys and inserted a statement that the noise monitoring programs identified in Appendix B Section 2.3 have been completed and no further monitoring under these programs is required.
5.2	Records Retention - Clarified requirement for log retention. Revised retention timeframe from "the life of the station" to "until termination of the operating license."
5.4.1	Routine Reports – Entire section relating to Routine Reports deleted.
5.4.2	Non-Routine Reports – Clarification of a "non-routine event" to be "an unusual or important environmental event."

Oyster Creek Nuclear Generating Station

Section	Proposed Changes
1.1.1.A	Fish Kill Monitoring Program - Removed reference to Annual Environmental Operating Report.
1.0	Environmental Monitoring – Administrative change to delete two paragraphs which have been duplicated in the Bases section.

2.1	Unusual or Important Environmental Events - Inserted statement that a duplicate immediate report is not required when an event is reportable under 10 CFR 50.72.
3.2	Corrected typographical error, "wilt" should be "will"
3.3	Review and Audit – An administrative change to incorporate a reference to the Quality Assurance Topical Report (QATR) has been added in place of the Quality Assurance Program. The administrative requirement to report results of all reviews and audits to the VP – Oyster Creek is deleted. Additionally, the audit frequency for the ETS matters has been revised from yearly to biennial, which is consistent with the other Exelon and AmerGen facilities.
3.5.1	Routine Reports – Entire section relating to Routine Reports deleted.
3.5.2	Non-Routine Environmental Operating Reports - Inserted statement that a duplicate immediate report is not required when an event is reportable under 10 CFR 50.72. Referenced communication methods (telephone, telegraph or facsimile) are deleted. Clarified that non-routine reports are to be made to the NRC.
3.5.3.A	Change in Environmental Technical Specifications – An administrative change is proposed to delete the requirement to perform a "benefit cost analysis" for a proposed change to plant design, in plant operation, or in procedures involved in carrying out the Environmental Technical Specifications. The benefit cost analysis has been replaced with words to provide a supporting "justification."
3.5.3. B	Change in Environmental Technical Specifications – An administrative change is proposed to delete the requirement to perform a "benefit cost analysis" for changes to the ETS, in addition to specific requirements to submit changes to the Director of Nuclear Reactor Regulation for review and authorization. This step will be annotated to state changes to the ETS shall be submitted in accordance with 10 CFR 50.90.
3.5.3.C	Change in Environmental Technical Specifications – Deleted requirement to notify the NRC of proposed changes to Federal, and State permits and certificates. The NRC shall be notified following approval by the authorizing agency. The informational paragraph which states that "the NRC will consult with the authorizing agency to determine appropriate actions" for changes to permits and certificates which have been identified to have "severe environmental impact," has been deleted.
3.6	Records Retention - Clarified requirement for log retention. Revised retention timeframe from "for the life of the plant" to "until the date of termination of the operating license."

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Peach Bottom Atomic Power Station

Section	Proposed Changes
1.2.1	Plant Reviews and Audits – Administrative change to rename Quality Assurance Program as Quality Assurance Topical Report (QATR).
1.3.1	Environmental Deviations –The internal notification requirement for Environmental Deviations has been revised from Plant Manager or Vice President to the Plant Manager or designee.
1.3.2	Environmental Deviations – Specific administrative requirement for Plant Operating Review Committee (PORC), the Nuclear Safety Review Board (NSRB) and the Vice President (VP) – Peach Bottom Atomic Power Station (PBAPS) to review Environmental Deviations is deleted.
1.3.3	Environmental Deviations – The position responsible for reporting Environmental Deviations is no longer specified.
1.4.1	Routine Reports - Entire section relating to Routine Reports deleted.
1.4.2.1	Environmental Deviation Reports – Inserted statement that a duplicate immediate report is not required when an event is reportable under 10 CFR 50.72. • The timeframe to submit a written report is revised from 10 working days to 30 days, which is now consistent with other Exelon and AmerGen facilities. • Referenced communication methods (telephone, telegraph or facsimile) are deleted. • Clarified that non-routine reports are to be made to the NRC.
1.4.2.2.b	Reporting Changes to the Plant or Permits – Annotated that changes to permits and certificates required by Federal, State and local regional authorities shall only be provided to the NRC upon approval by the authorizing agency.
1.5.1	Records Retained for 5 Years - Clarified requirement for log retention. Deleted requirement to maintain records of special study programs.
1.5.2	Records Retained for the Life of the Plant - Revised retention timeframe from "the life of the plant" to until "the date of termination of the operating license."

Quad Cities Nuclear Station

Section	Proposed Changes
1.0	Objectives of the Environmental Protection Plan - Removed references to facility construction.
2.2	Reporting Related to the NPDES Permits and State Certifications - Revised reporting requirements related to NPDES Permit or State certification to only notify the NRC following approval of changes.

2.3	Changes Required for Compliance with Other Environmental Regulations - Administrative change to replace the phrase "which are required to achieve compliance with" with the phrase "that are either regulated or mandated by." An additional sentence has been added to state "however, if any environmental impacts of a change are not evaluated under other Federal, State or local environmental regulations, then those impacts are subject to the requirements of Section 2.1."
3.1	Unusual or Important Environmental Events - Inserted statement that a duplicate immediate report is not required when an event is reportable under 10 CFR 50.72.

3.0 BACKGROUND

The Environmental Protection Plan (EPP) was established during initial plant licensing to monitor terrestrial and aquatic issues such as thermal mixing, steam fog production, potential erosion, cooling tower drift impact, and noise. The regulatory basis for the establishment of the EPP was 10 CFR 50.36b, "Environmental conditions." This regulation requires that any obligations in the environmental area identified by the NRC during their operating license review be included in an attachment to the license. The conditions in the attachment are derived from information contained in the environmental report and the supplement to the environmental report submitted as required by 10 CFR 51.50, "Environmental report - construction permit stage," and 10 CFR 51.53, "Post construction environmental reports." In many cases, the required monitoring programs have been completed and the results have demonstrated that the environmental impacts are negligible.

Operation of the facilities listed above is governed by the environmental requirements of other Federal (i.e., the Environmental Protection Agency (EPA)), State, and local agencies and must comply with the applicable protection regulations. The NRC relies on these agencies to regulate the nuclear generating stations in environmental matters. No environmental protection requirements established by other agencies are being reduced by modifying the Appendix B of the respective station's Operating License.

4.0 TECHNICAL ANALYSIS

4.1 General Analysis and Justification

The analyses and justification for the proposed changes are addressed separately for each station. Major changes that affect most of the stations are discussed below.

Annual Environmental Operating Report

It is proposed that the requirement to create and submit an Annual Environmental Operating Report be deleted from each of the referenced Appendix B EPPs. The Annual Report to the NRC discusses implementation of the EPP for the previous year and includes a list of all changes in the station design or operation, tests, and experiments involving potentially significant unreviewed environmental questions, a list of non-routine reports submitted, and a list of EPP non-compliances and the corrective actions taken to remedy them. The reporting of such information for each station is administrative and currently available to the NRC via other means and is available onsite for inspection.

- Changes in the station design or operation, tests, and experiments involving potentially significant unreviewed environmental questions are addressed by the EGC and AmerGen implementing procedures associated with 10 CFR 50.59, "Changes, tests, and experiments." For activities that involve a change to the Environmental Protection Program, the 10 CFR 50.59 applicability review and the EGC 10 CFR 50.59 Resource Manual refer to the EGC procedure for Environmental Evaluations. When an environmental evaluation indicates that such an activity involves an unreviewed environmental question, a written evaluation is required to be submitted to the NRC and approval must be obtained prior to implementation. When such an activity involves a change to the EPP, a license amendment shall be submitted to the NRC in accordance with 10 CFR 50.90.

- Records of changes in station design, operation, tests, and experiments are also retained in accordance with the 10 CFR 50.59 Review Program, and the Environmental Evaluation Program, and are provided to or made available to the NRC for review.

- Environmental non-compliances related to the health and safety of the public or onsite personnel, as well as Unusual or Important Environmental Events, are reported to the NRC in accordance with the guidance in 10 CFR 50.72, "Immediate notification requirements for operating nuclear power reactors," or 10 CFR 72.75, "Reporting requirements for specific events and conditions." Section 10 CFR 50.72(b)(2)(xi) states that the licensee shall notify the NRC as soon as practical and in all cases, within four hours of the occurrence of..."any event or situation, related to the health and safety of the public or onsite personnel, or protection of the environment, for which a news release is planned or notification to other government agencies has been or will be made." Section 10 CFR 72.75(b)(2) states that each licensee shall notify the NRC for "any event or situation related to the health and safety of the public or onsite personnel, or protection of the environment, for which a news release is planned or notification to other government agencies has been or will be made." Significant EPP non-compliances and appropriate non-routine reports will be communicated to the NRC under these regulations. Corrective actions for environmental non-compliances are tracked through the stations' Corrective Action Program and completed corrective actions are available to the NRC for review.

- Other EPP non-compliances will be documented through the station's Corrective Action Program and are provided to or made available to the NRC for review.

- Changes to state and federal permits or certifications are reported to the NRC in accordance with the requirements of the station's EPP when the permits and certificates are approved by the regulating agency.

- Changes to the EPP program are provided to the NRC in accordance with 10 CFR 50.90.

- Most environmental monitoring and special study programs identified during initial station licensing have been completed. Remaining ongoing environmental monitoring and special study program results will be available to the NRC and deviations will be reported in accordance with the Non Routine Reports sections of the station's EPP or the Corrective Action Program.

With reporting requirements fully addressed through 10 CFR 50.72, 72.75, 50.59, 50.90 and existing EGC and AmerGen programs, the administrative requirement to develop an Annual Environmental Operating Report may be deleted in its entirety.

Duplicate Reporting for Unusual or Important Environmental Events

A change is proposed that if an event is reportable under 10 CFR 50.72, "Immediate notification requirements for operating nuclear power reactors," then a duplicate immediate report in accordance with the station's EPP is not required. Requirements are provided in each station's EPP to report Unusual or Important Environmental Events to the NRC within 24 hours. Unusual and Important Environmental Events are defined as any occurrence of an event that indicates or could result in significant environmental impact causally related to plant operation. Such events shall be recorded and reported to the NRC within 24 hours and followed by a written report.

Similarly, 10 CFR 50.72(b)(2)(xi) states that the licensee shall notify the NRC as soon as practical and in all cases, within four hours of the occurrence of..."any event or situation, related to the health and safety of the public or onsite personnel, or protection of the environment, for which a news release is planned or notification to other government agencies has been or will be made." The change proposed will relieve the administrative burden of making duplicate reports to the NRC for the same event. Follow-up written reports are still required to be submitted in accordance with the EPP.

Records Retention

It is proposed that the Records Retention section of the EPP be revised to reflect that records generally need to be retained until the termination of the operating license rather than the end of life of the plant. Additionally the reference to "logs" has been deleted.

This section requires retention of records relative to the environmental aspects of plant operation and modifications determined to potentially affect the continued protection of the environment. An administrative requirement to maintain logs is deleted for clarity in that there are no dedicated environmental logs maintained at the sites. Records relative to the environment are required to be documented by specific State permits (i.e., NPDES Permit) and Exelon Corporation environmental administrative procedures. Such entries are maintained as part of station operating logs. The reference to environmental logs has been deleted for clarity but the purpose of the original statement is maintained.

Records of modifications to stations structures, systems and components determined to potentially affect the continued protection of the environment shall be retained until the date of the termination of the operating license. The records required to be retained in applicable Federal and State regulations have been deemed by those authorities to be adequate to demonstrate operations within regulatory requirements and document noncompliant conditions.

The proposed change of the retention timeframe to "the termination of the operating license" makes the requirement consistent with similar requirements in other regulations (i.e., 10 CFR 50.59). This change has been proposed to provide clarity but does not change the objective of the requirement.

4.2 Plant Specific Analyses and Justification

Braidwood Station, Units 1 and 2

Section 2.1 Aquatic Issues

This section of the EPP references the Illinois Environmental Protection Agency as the issuer of

the NPDES Permit. The proposed change will standardize the issuer of the NPDES Permit to be the Federal or State permitting authority. The use of a more generic reference to the permitting authority will prevent future changes in the structure of the state governments from creating new inconsistencies.

Section 3.1 Plant Design and Operation

The proposed change in Section 3.1, "Plant Design and Operation," is to delete the reference to the Annual Environmental Operating Report. With the deletion of the Annual Environmental Operating Report, a reference within this section is not required.

Section 3.2 Reporting Related to the NPDES Permit and State Certification

The proposed changes in Section 3.2 are to revise the reporting requirements related to approval or changes to the NPDES Permit or State certification.

Currently this section requires that changes and additions to the NPDES Permit or the State Certification shall be reported to the NRC. This section also requires that a proposed revision be sent to the NRC at the same time as it is submitted to the permitting agency. The NRC relies on the State regulatory agency to regulate these matters. Changes to the NPDES Permit or State Certification will continue to be provided to the NRC within 30 days of approval. Proposed changes will no longer be provided to the NRC. Information related to environmental permits will continue to be available onsite for NRC review.

Section 3.3 Changes Required for Compliance with Other Environmental Regulations

A change is proposed to replace the phrase "which are required to achieve compliance with" with the phrase "that are either regulated or mandated by." This section exempts those changes that are regulated or mandated by other Federal, State, and local environmental regulations from the requirements of Section 3.1. An additional sentence has been added to state, "However, if any environmental impacts of a change are not evaluated under other Federal, State or local environmental regulations, then those impacts are subject to the requirements of Section 3.1." This is an administrative change to improve clarity and understanding and does not change the objective of the original statement.

Section 4.1 Unusual or Important Environmental Events

A change is proposed that if an event is reportable under 10 CFR 50.72, "Immediate notification requirements for operating nuclear power reactors," then a duplicate immediate report in accordance with the station's EPP is not required. Requirements are provided in the EPP to report Unusual or Important Environmental Events to the NRC within 24 hours. Unusual and Important Environmental Events are defined as any occurrence of an event that indicates or could result in significant environmental impact causally related to plant operation. Such events shall be recorded and reported to the NRC within 24 hours and followed by a written report. Similarly, 10 CFR 50.72(b)(2)(xi) states that the licensee shall notify the NRC as soon as practical and in all cases, within four hours of the occurrence of..."any event or situation, related to the health and safety of the public or onsite personnel, or protection of the environment, for which a news release is planned or notification to other government agencies has been or will be made." The change proposed will relieve the administrative burden of making duplicate reports to the NRC for the same event. Follow-up written reports are still required to be submitted in accordance with the EPP.

Section 5.2 Records Retention

A revision is proposed to change the requirement of log retention and retention timeframe from "for the life of the station" to "until the date of termination of the operating license."

This section requires retention of records relative to the environmental aspects of plant operation and modifications determined to potentially affect the continued protection of the environment. An administrative requirement to maintain logs is deleted. The requirement to maintain all records is maintained. There are no dedicated environmental logs maintained on site. Logs relative to the environment are required to be documented by specific State permits (i.e., NPDES Permit) and EGC environmental administrative procedures. Such entries are maintained as part of station operating logs. The reference to environmental logs has been deleted for clarity but the purpose of the original statement is maintained.

The proposed change in the retention timeframe to the termination of the operating license makes the requirement consistent with similar requirements in other regulations (i.e., 10 CFR 50.59). This change has been proposed to provide clarity but does not change the objective of the requirement.

Section 5.4.1 Routine Reports

A change is proposed to delete the entire section relating to Routine Reports.

This section requires an annual environmental operating report to be submitted to the NRC by May 1 of each year. The report includes a list of all changes in the station design or operation, tests, and experiments made in accordance with Section 3.1 involving potentially significant unreviewed environmental questions, a list of nonroutine reports submitted in accordance with Subsection 5.4.2, and a list of EPP noncompliances and the corrective actions taken to remedy them.

Design changes are implemented under EGC implementing procedures associated with 10 CFR 50.59, "Changes, tests and experiments" and Section 3.1 of the EPP. If an environmental evaluation indicates that an activity involves an unreviewed environmental question, or involves a change to the EPP, prior NRC approval must be obtained prior to implementation. Environmental non-compliances are reported as required by 10 CFR 50.72, "Immediate notification requirements for operating nuclear power reactors," and corrective actions will be included in the Exelon Corrective Action Program (CAP). With the requirements addressed in 10 CFR 50.72, the EGC 10 CFR 50.59 Review Program and Environmental Evaluation Program, it is proposed that Section 5.4.1 be deleted in its entirety.

Section 5.4.2 Non-Routine Reports

A change is proposed to Section 5.4.2 to revise a "non-routine event" to be an "unusual or important environmental event."
Currently this section requires written reports to be sent to the NRC within 30 days of occurrence of a nonroutine event. An administrative change is being made to clarify the objective of the section to refer to an "unusual or important environmental event" as described in Section 4.1 of Appendix B. This change is also for consistency with all other EGC and AmerGen stations.

Byron Station, Units 1 and 2

Section 2.1 Aquatic Issues

This section of the EPP references the Illinois Environmental Protection Agency as the issuer of the NPDES Permit. The proposed change will standardize the issuer of the NPDES Permit to be the Federal or State permitting authority. The use of a more generic reference to the permitting authority will prevent future changes in the structure of the state governments from creating new inconsistencies.

Section 3.1 Plant Design and Operation

The proposed change in Section 3.1, "Plant Design and Operation," is to delete the reference to the Annual Environmental Operating Report. With the deletion of the Annual Environmental Operating Report, a reference within this section is not required.

Section 3.2 Reporting Related to the NPDES Permit and State Certification

The proposed changes in Section 3.2 are to revise the reporting requirements related to approval or changes to the NPDES Permit or State certification.

Currently this section requires that changes and additions to the NPDES Permit or the State Certification shall be reported to the NRC. This section also requires that a proposed revision be sent to the NRC at the same time as it is submitted to the permitting agency. The NRC relies on the State regulatory agency to regulate these matters. Changes to the NPDES Permit or State Certification will continue to be provided to the NRC within 30 days of approval. Proposed changes will no longer be provided to the NRC. Information related to environmental permits will continue to be available onsite for NRC review.

Section 3.3 Changes Required for Compliance with Other Environmental Regulations

A change is proposed to replace the phrase "which are required to achieve compliance with" with the phrase "that are either regulated or mandated by." This section exempts those changes that are regulated or mandated by other Federal, State, and local environmental regulations from the requirements of Section 3.1. An additional sentence has been added to state, "However, if any environmental impacts of a change are not evaluated under other Federal, State or local environmental regulations, then those impacts are subject to the requirements of Section 3.1." This is an administrative change to improve clarity and understanding and does not change the objective of the original statement.

Section 4.1 Unusual or Important Environmental Events

A change is proposed that if an event is reportable under 10 CFR 50.72, "Immediate notification requirements for operating nuclear power reactors," then a duplicate immediate report in accordance with the station's EPP is not required. Requirements are provided in the EPP to report Unusual or Important Environmental Events to the NRC within 24 hours. Unusual and Important Environmental Events are defined as any occurrence of an event that indicates or could result in significant environmental impact causally related to plant operation. Such events shall be recorded and reported to the NRC within 24 hours and followed by a written report.

Similarly, 10 CFR 50.72(b)(2)(xi) states that the licensee shall notify the NRC as soon as practical and in all cases, within four hours of the occurrence of..."any event or situation, related

to the health and safety of the public or onsite personnel, or protection of the environment, for which a news release is planned or notification to other government agencies has been or will be made." The change proposed will relieve the administrative burden of making duplicate reports to the NRC for the same event. Follow-up written reports are still required to be submitted in accordance with the EPP.

Section 4.2 Environmental Monitoring

This section consists of subsections for "Aerial Remote Sensing" and "Confirmatory Sound Level Survey." A change to this section is proposed to insert a statement that the Terrestrial monitoring programs have been completed and further monitoring is not required.

There were two terrestrial issues raised by the NRC in the Final Environmental Statement for the Byron Station Operating License (FES-OL). The first was the potential impact of cooling tower emissions on the terrestrial environment and the second was a potential for increased noise level impacts in the vicinity of the station. The terrestrial environment was assessed by an aerial remote sensing program, which was completed in 1993. The confirmatory sound level survey requirements were completed in 1988. With both issues no longer containing any active monitoring requirements, Section 4.2 may be deleted in its entirety.

Section 4.2.1 Aerial Remote Sensing

A revision is proposed to delete the entire Aerial Remote Sensing section from the EPP.

The potential impact of cooling tower emissions on the terrestrial environment was assessed by an aerial remote sensing program that was completed in 1993. No further monitoring under this program is required.

Section 4.2.2 Confirmatory Sound Level Survey

A revision is proposed to delete the entire Confirmatory Sound Level Survey section from the EPP.

The confirmatory sound level survey requirements were completed in 1988. No further monitoring under this program is required.

Section 5.2 Records Retention

A revision is proposed to change the requirement of log retention and retention timeframe from "for the life of the station" to "until the date of termination of the operating license."

This section requires retention of records relative to the environmental aspects of plant operation and modifications determined to potentially affect the continued protection of the environment. An administrative requirement to maintain logs is deleted. The requirement to maintain all records is maintained. There are no dedicated environmental logs maintained on site. Logs relative to the environment are required to be documented by specific State permits (i.e., NPDES Permit) and EGC environmental administrative procedures. Such entries are maintained as part of station operating logs. The reference to environmental logs has been deleted for clarity but the purpose of the original statement is maintained.

The proposed change in the retention timeframe to the termination of the operating license makes the requirement consistent with similar requirements in other regulations (i.e., 10 CFR

50.59). This change has been proposed to provide clarity but does not change the objective of the requirement.

Section 5.4.1 Routine Reports

A change is proposed to delete the entire section relating to Routine Reports.

This section requires an annual environmental operating report to be submitted to the NRC by May 1st of each year. The report includes summaries and analyses of the results of the monitoring requirements of Section 4.2, a list of EPP noncompliances and the corrective actions taken to remedy them, a list of all changes in the station design or operation, tests, and experiments made in accordance with Section 3.1 involving potentially significant unreviewed environmental questions, and a list of nonroutine reports submitted in accordance with Subsection 5.4.2.

As previously discussed in the evaluation of Section 4.2, "Environmental Monitoring," the terrestrial and noise monitoring programs are complete. Environmental non-compliances are reported as required by 10 CFR 50.72, "Immediate notification requirements for operating nuclear power reactors," and corrective actions will be included in the Exelon Corrective Action Program (CAP). Design changes are addressed by the EGC implementing procedures associated with 10 CFR 50.59, "Changes, tests and experiments" and Section 3.1 of the EPP. If an environmental evaluation indicates that an activity involves an unreviewed environmental question, or involves a change to the EPP, prior NRC approval must be obtained prior to implementation. With the environmental monitoring complete in Section 4.2, and the remaining requirements addressed in 10 CFR 50.72, the EGC 10 CFR 50.59 Review Program and Environmental Evaluation Program, it is proposed that Section 5.4.1 be deleted in its entirety.

Section 5.4.2 Non-Routine Reports

A change is proposed to Section 5.4.2 to revise a "non-routine event" to be an "unusual or important environmental event."

Currently, this section requires written reports to be sent to the NRC within 30 days of occurrence of a nonroutine event. An administrative change is being made to clarify the purpose of the section to refer to an "unusual or important environmental event" as described in Section 4.1 of Appendix B. This change is also for consistency with all other EGC and AmerGen stations.

Clinton Power Station

Section 1.0 Objectives of the Environmental Protection Plan

A change is proposed to remove the reference to facility construction from Section 1.0. This section contains the objectives of the EPP, which is to provide for protection of the environmental values during operation of the nuclear facility. Construction is complete at Clinton Power Station and therefore the reference to construction is deleted.

Section 2.1 Aquatic Issues

This section of the EPP references the Illinois Environmental Protection Agency as the issuer of the NPDES Permit. The proposed change will standardize the issuer of the NPDES Permit to be the Federal or State permitting authority. The use of a more generic reference to the

permitting authority will prevent future changes in the structure of the state governments from creating new inconsistencies.

Section 3.1 Plant Design and Operation

The proposed change in Section 3.1, "Plant Design and Operation," is to delete the reference to the Annual Environmental Operating Report. With the deletion of the Annual Environmental Operating Report, a reference within this section is not required.

Section 3.2 Reporting Related to the NPDES Permit and State Certification

The proposed changes in Section 3.2 are to revise the reporting requirements related to approval or changes to the NPDES Permit or State certification.

Currently, this section requires that changes and additions to the NPDES Permit or the State Certification shall be reported to the NRC. This section also requires that a proposed revision be sent to the NRC at the same time as it is submitted to the permitting agency. The NRC relies on the State regulatory agency to regulate these matters. Changes to the NPDES Permit or State Certification will continue to be provided to the NRC within 30 days of approval. Proposed changes will no longer be provided to the NRC. Information related to environmental permits will continue to be available onsite for NRC review.

Section 3.3 Changes Required for Compliance with Other Environmental Regulations

A change is proposed to replace the phrase "required to achieve compliance with" with the phrase "that are either regulated or mandated by." This section exempts those changes that are regulated or mandated by other Federal, State, and local environmental regulations from the requirements of Section 3.1. An additional sentence has been added to state, "However, if any environmental impact of a change is not evaluated under other Federal, State or local environmental regulations, then the impact is subject to the requirements of Section 3.1." This is an administrative change to improve clarity and understanding and does not change the objective of the original statement.

Section 4.1 Unusual or Important Environmental Events

A change is proposed that if an event is reportable under 10 CFR 50.72, "Immediate notification requirements for operating nuclear power reactors," then a duplicate immediate report in accordance with the station's EPP is not required. Requirements are provided in the EPP to report Unusual or Important Environmental Events to the NRC within 24 hours. Unusual and Important Environmental Events are defined as any occurrence of an event that indicates or could result in significant environmental impact causally related to plant operation. Such events shall be recorded and reported to the NRC within 24 hours and followed by a written report.

Similarly, 10 CFR 50.72(b)(2)(xi) states that the licensee shall notify the NRC as soon as practical and in all cases, within four hours of the occurrence of..."any event or situation, related to the health and safety of the public or onsite personnel, or protection of the environment, for which a news release is planned or notification to other government agencies has been or will be made." The change proposed will relieve the administrative burden of making duplicate reports to the NRC for the same event. Follow-up written reports are still required to be submitted in accordance with the EPP.

The change to delete references to telephone, telegraph or facsimile is to align the text of the EPPs into conformance with the present methods of reporting events to the NRC.

Section 4.2 Environmental Monitoring

The proposed change will standardize the agencies outside the NRC that provide jurisdiction over the Environmental Monitoring programs to be the Federal or State permitting authority instead of the Illinois Environmental Protection Agency, Illinois Department of Public Health, and Illinois Department of Transportation. The use of a more generic reference to the permitting authority will prevent future changes in the structure of the state governments from creating new inconsistencies. In addition, the NRC relies on the State and Federal permitting authority to regulate matters in accordance with Section 2.0.

Section 5.2 Records Retention

A revision is proposed to change the requirement of log and data retention and retention timeframe from the "life of the plant" to "until the date of termination of the operating license."

This section requires retention of records relative to the environmental aspects of plant operation and modifications determined to potentially affect the continued protection of the environment. A change is proposed to remove the requirement of data and log retention and delete the requirement for preoperational environmental monitoring records, procedures, data and logs. The requirement to maintain all records is maintained. There are no dedicated environmental logs maintained on site. Logs relative to the environment are required to be documented by specific State permits (i.e., NPDES Permit) and EGC and AmerGen environmental administrative procedures. Such entries are maintained as part of station operating logs. The reference to environmental logs has been deleted for clarity but the purpose of the original statements is maintained.

The proposed change in the retention timeframe to the termination of the operating license makes the requirement consistent with similar requirements in other regulations (i.e., 10 CFR 50.59). This change has been proposed to provide clarity but does not change the objective of the requirement.

Section 5.4.1 Routine Reports

A change is proposed to delete the entire section relating to Routine Reports. This section requires an annual environmental operating report be submitted to the NRC by May 1 of each year. The report includes a list of EPP noncompliances and the corrective actions taken to remedy them, all changes in the station design or operation, tests, and experiments made in accordance with Section 3.1 involving potentially significant unreviewed environmental issues, a list of nonroutine reports submitted in accordance with Subsection 5.4.2, and a list of any results and/or assessments for the environmental monitoring programs described in Subsection 2.0

Environmental non-compliances are reported as required by 10 CFR 50.72, "Immediate notification requirements for operating nuclear power reactors," and corrective actions will be included in the Exelon/AmerGen Corrective Action Program (CAP). Design changes are addressed by the EGC and AmerGen implementing procedures associated with 10 CFR 50.59, "Changes, tests and experiments" and Section 3.1 of this EPP. If an environmental evaluation indicates that an activity involves an unreviewed environmental question, or involves a change to the EPP, prior NRC approval must be obtained prior to implementation.

All environmental monitoring programs described in Subsection 2.0 have been completed with the exception of a level of effort monitoring program. The ongoing level of effort monitoring for the Unit 2 excavation is accomplished by the NPDES Permit. Outfall 010 of the NPDES Permit is the Unit 2 excavation area and is monitored in accordance with the Storm Water Pollution Prevention Plan. Any issues resulting from the implementation of this plan are documented into the Exelon/AmerGen CAP.

With reporting requirements fully addressed in 10 CFR 50.72, the EGC and AmerGen 10 CFR 50.59 Review Program and Environmental Evaluation Program and the NPDES Permit, it is proposed that Section 5.4.1 be deleted in its entirety.

Section 5.4.2 Non-Routine Reports

A change is proposed to Section 5.4.2, "Nonroutine Reports," to revise a "non-routine event" to be an "unusual or important environmental event."

Currently, this section requires written reports to be sent to the NRC within 30 days of occurrence of a nonroutine event. An administrative change is being made to clarify the objective of the section to refer to an "unusual or important environmental event" as described in Section 4.1 of Appendix B. This change is also for consistency with all other EGC and AmerGen stations.

With the proposed deletion of Section 5.4.1, it is also proposed to delete the numbering and title of Section 5.4.2, "Nonroutine Reports," and therefore designate the body of Section 5.4.2 under 5.4, "Plant Reporting Requirements." This change provides clarity only and does not delete any content of the existing Section 5.4.2.

LaSalle County Station, Units 1 and 2

Section 1.0 Objective of the Environmental Protection Plan

A change is proposed to remove references to facility construction from Section 1.0. This section contains the objectives of the EPP which is to provide for protection of the environmental values during construction and operation of the nuclear facility. Construction is complete at LaSalle County Station and therefore the reference to construction is deleted.

Section 2.1 Aquatic Issues

This section of the EPP references the Illinois Environmental Protection Agency as the issuer of the NPDES Permit. The proposed change will standardize the issuer of the NPDES Permit to be the Federal or State permitting authority. The use of a more generic reference to the permitting authority will prevent future changes in the structure of the state governments from creating new inconsistencies.

Section 2.2 Terrestrial Issues

The proposed change in Section 2.2 is to clarify that the State Dam Permit addresses and will regulate, the potential erosion effects around the cooling pond and the banks of Armstrong Run. This terrestrial issue was raised by the NRC in the Final Environmental Statement for the LaSalle County Station Operating License (FES-OL). The Dam Permit currently issued by the Illinois Department of Natural Resources addresses all regulatory requirements of the EPP. The NRC will rely on this State agency for regulation of these requirements.

Section 3.1 Plant Design and Operation

The proposed change in Section 3.1, "Plant Design and Operation," is to delete the reference to the Annual Environmental Operating Report. With the deletion of the Annual Environmental Operating Report, a reference within this section is not required.

Section 3.2 Reporting Related to the NPDES Permit and State Certification

The proposed changes in Section 3.2 are to revise the reporting requirements related to approval or changes to the NPDES Permit or State certification.

Currently this section requires that changes and additions to the NPDES Permit or the State Certification shall be reported to the NRC. This section also requires that a proposed revision be sent to the NRC at the same time as it is submitted to the permitting agency. The NRC relies on the State regulatory agency to regulate these matters. Changes to the NPDES Permit or State Certification will continue to be provided to the NRC within 30 days of approval. Proposed changes will no longer be provided to the NRC. Information related to environmental permits will continue to be available onsite for NRC review.

An administrative change is incorporated to delete a portion of the first paragraph in this section that had been inadvertently duplicated.

Section 3.3 Changes Required for Compliance with Other Environmental Regulations

A change is proposed to replace the phrase "required to achieve compliance with" with the phrase "that are either regulated or mandated by." This section exempts those changes that are regulated or mandated by other Federal, State, and local environmental regulations from the requirements of Section 3.1. An additional sentence has been added to state, "However, if any environmental impacts of a change are not evaluated under other Federal, State or local environmental regulations, then those impacts are subject to the requirements of Section 3.1." This is an administrative change to improve clarity and understanding and does not change the objective of the original statement.

Section 4.1 Unusual or Important Environmental Events

A change is proposed that if an event is reportable under 10 CFR 50.72, "Immediate notification requirements for operating nuclear power reactors," then a duplicate immediate report in accordance with the station's EPP is not required. Requirements are provided in the EPP to report Unusual or Important Environmental Events to the NRC within 24 hours. Unusual and Important Environmental Events are defined as any occurrence of an event that indicates or could result in significant environmental impact causally related to plant operation. Such events shall be recorded and reported to the NRC within 24 hours and followed by a written report.

Similarly, 10 CFR 50.72(b)(2)(xi) states that the licensee shall notify the NRC as soon as practical and in all cases, within four hours of the occurrence of..."any event or situation, related to the health and safety of the public or onsite personnel, or protection of the environment, for which a news release is planned or notification to other government agencies has been or will be made." The change proposed will relieve the administrative burden of making duplicate reports to the NRC for the same event. Follow-up written reports are still required to be submitted in accordance with the EPP.

The change to delete references to telephone, telegraph or facsimile is to align the text of the EPPs into conformance with the present methods of reporting events to the NRC.

Section 4.2 Environmental Monitoring

The proposed change will standardize the agencies outside the NRC that provide jurisdiction over the Environmental Monitoring programs to be the Federal or State permitting authority.

Environmental monitoring programs are conducted in accordance with the guidance and controls of agencies outside of the NRC. The NRC has recognized the Federal or State agencies as the authorities having jurisdiction in Section 2.0 of the EPP. Therefore, there is no specific NRC required Environmental Monitoring in the EPP.

Section 4.2.1 Vegetative Integrity on Cooling Pond Dike

A change is proposed to delete the entire Vegetative Integrity on Cooling Pond Dike section from the EPP.

The terrestrial issue raised by the NRC in the FES-OL was potential erosion effects along the dike around the cooling lake and the banks of Armstrong Run. The vegetative integrity and erosion were assessed by visual inspection on the outer face of the peripheral cooling pond dike at the beginning of the spring and fall planting seasons.

A four-year quantitative dike re-vegetation study was completed and submitted to the NRC in 1981. Since then, the Annual Environmental Operating Reports submitted by LaSalle County Station for the years 1982 to present indicated no significant discrepancies with vegetative integrity or erosion of the cooling lake dikes and peripheral ditches discharging into Armstrong Run. Subsequent to the issuance of the Unit 1 and 2 Operating Licenses, the LaSalle County Station cooling lake dikes and peripheral ditches came under the purview of a State issued Dam Permit. Conditions specified in the permit along with the Illinois Department of Natural Resources (IDNR) guidelines provide detailed erosion controls, vegetation maintenance and inspection requirements that capture the requirements detailed in the current EPP. The Annual Dam Inspection Report is submitted to the State regulating authority and is available to the NRC for inspection and review.

Based on the studies and inspections performed, plus current permitting and regulations by a specific State agency, it is proposed that Section 4.2.1 be deleted in its entirety.

Section 5.2 Records Retention

A revision is proposed to revise the requirement of log retention and retention timeframe from "for the life of the plant" to "until the date of termination of the operating license."

This section requires retention of records relative to the environmental aspects of plant operation and modifications determined to potentially affect the continued protection of the environment. An administrative requirement to maintain logs is deleted. The requirement to maintain all records is maintained. There are no dedicated environmental logs maintained on site. Logs relative to the environment are required to be documented by specific State permits (i.e., NPDES Permit) and EGC environmental administrative procedures. Such entries are maintained as part of station operating logs. The reference to environmental logs has been deleted for clarity but the purpose of the original statement is maintained.

The proposed change in the retention timeframe to the termination of the operating license makes the requirement consistent with similar requirements in other regulations (i.e., 10 CFR 50.59). This change has been proposed to provide clarity but does not change the objective of the requirement.

Section 5.4.1 Routine Reports

A change is proposed to delete the entire section relating to Routine Reports.

This section requires an annual environmental operating report be submitted to the NRC by May 1 of each year. The report includes summaries and analyses of the results of the monitoring requirements of Section 4.2, a list of EPP noncompliances and the corrective actions taken to remedy them, a list of all changes in the station design or operation, tests, and experiments made in accordance with Section 3.1 involving potentially significant unreviewed environmental questions, and a list of nonroutine reports submitted in accordance with Subsection 5.4.2.

As previously discussed in the evaluation of Section 4.2, "Environmental Monitoring," with specific environmental monitoring under the conditions and regulations of the Dam Permit, it is proposed that Section 4.2.1, "Vegetative Integrity on Cooling Pond Dike," be deleted. Environmental noncompliances are reported as required by 10 CFR 50.72, "Immediate notification requirements for operating nuclear power reactors," and corrective actions will be included in the Exelon Corrective Action Program (CAP). Design changes are addressed by the EGC implementing procedures associated with 10 CFR 50.59, "Changes, tests and experiments" and Section 3.1 of this EPP. If an environmental evaluation indicates that an activity involves an unreviewed environmental question, or involves a change to the EPP, prior NRC approval must be obtained prior to implementation.

With the deletion of Section 4.2.1, and the remaining requirements addressed in 10 CFR 50.72, the EGC 10 CFR 50.59 Review Program and Environmental Evaluation Program, it is proposed that Section 5.4.1 be deleted in its entirety.

Section 5.4.2 Non-Routine Reports

A change is proposed to Section 5.4.2 to revise a "non-routine event" to be an "unusual or important environmental event."

Currently, this section requires written reports to be sent to the NRC within 30 days of occurrence of a nonroutine event. An administrative change is being made to clarify the objective of the section to refer to an "unusual or important environmental event" as described in Section 4.1 of Appendix B. This change is also for consistency with all other EGC and AmerGen stations.

Limerick Generating Station, Units 1 and 2

Cover and Table of Contents

Reference to the opposite unit has been removed from the Title on the cover page and Table of Contents. This administrative change is incorporated for clarity. The documents are part of Unit specific Technical Specifications and should be labeled as such.

Section 1.0 Objectives of the Environmental Protection Plan

A change is proposed to remove references to facility construction from Section 1.0. This section contains the objectives of the EPP, which are to provide for protection of the environmental values during operation of the nuclear facility. Construction is complete at Limerick Generating Station and therefore the reference to environmental effects of facility construction is deleted from sub-section (3).

Section 3.1 Plant Design and Operation

The proposed change in Section 3.1, "Plant Design and Operation," is to delete the reference to the Annual Environmental Operating Report. With the deletion of the Annual Environmental Operating Report in Section 5.4.1, a reference within this section is not required.

Section 3.2 Reporting Related to the NPDES Permit and State Certification

The proposed changes in Section 3.2 are to revise the reporting requirements related to approval or changes to the NPDES Permit or State certification.

Currently, this section requires that changes and additions to the NPDES Permit or the State Certification shall be reported to the NRC. This section also requires that a proposed revision be sent to the NRC at the same time as it is submitted to the permitting agency. However, the NRC relies on the State regulatory agency to regulate these matters; therefore, proposed changes will no longer be provided to the NRC. Changes to the NPDES Permit or State Certification will continue to be provided to the NRC within 30 days of approval. Information related to environmental permits will continue to be available onsite for NRC review.

Section 3.3 Changes Required for Compliance with Other Environmental Regulations

A change is proposed to replace the phrase "required to achieve compliance with other" with the phrase "that are either regulated or mandated by." This section exempts those changes that are regulated or mandated by other Federal, State, and local environmental regulations from the requirements of Section 3.1. An additional sentence has been added to state, "However, if any environmental impacts of a change are not evaluated under other Federal, State or local environmental regulations, then those impacts are subject to the requirements of Section 3.1." This is an administrative change to improve clarity and understanding and does not change the objective of the original statement.

Section 4.1 Unusual or Important Environmental Events

A change is proposed that if an event is reportable under 10 CFR 50.72, "Immediate notification requirements for operating nuclear power reactors," then a duplicate immediate report in accordance with the station's EPP is not required. Requirements are provided in the EPP to report Unusual or Important Environmental Events to the NRC within 24 hours. Unusual and Important Environmental Events are defined as any occurrence of an event that indicates or could result in significant environmental impact causally related to plant operation. Such events shall be recorded and reported to the NRC within 24 hours and followed by a written report.

Similarly, 10 CFR 50.72(b)(2)(xi) states that the licensee shall notify the NRC as soon as practical and in all cases, within four hours of the occurrence of..."any event or situation, related to the health and safety of the public or onsite personnel, or protection of the environment, for which a news release is planned or notification to other government agencies has been or will

be made." The change proposed will relieve the administrative burden of making duplicate reports to the NRC for the same event. Follow-up written reports are still required to be submitted in accordance with the EPP.

Section 4.2.3 Maintenance of Transmission Line Corridors

A change is proposed to Section 4.2.3 to delete the records retention requirements for use of herbicides within the Limerick Generating Station transmission line corridors.
The use of herbicides (and pesticides) in the transmission line corridors shall be conducted in accordance with 40 CFR 171.7, "Submission and approval of State plans for certification of commercial and private applicators of restricted use pesticides" and Title 7, Section 128 of the Pennsylvania Code. The records related to the use of herbicides within the Limerick Generating Station transmission line corridors are required to be maintained by the Herbicide/Pesticide "application business" in accordance with Title 7, Section 128 of the Pennsylvania Code. Section 128.35 requires the applicator to maintain records relating to type and use for a record retention period for 3 years. The record retention period is effectively changed from 5 years to 3 years and is consistent with Title 7, Section 128.35 of the Pennsylvania Code. Exelon will still maintain overall responsibility for use and application of herbicides in the Transmission corridors by vendors.

Section 4.2.4 Noise Monitoring

A change is proposed to Section 4.2.4 to delete the historical requirements for Sound Surveys and insert a statement that all noise-monitoring programs identified in Section 2.3 have been completed and no further monitoring under these programs is required.

The General Sound Level Surveys were performed and the program was terminated upon completion. The following reports listed contain detailed information which demonstrate the noise levels emanating from Point Pleasant Pumping Station, Bradshaw Reservoir, and Limerick Generating Station met all applicable noise related regulations. The surveys were documented as follows.

1. Limerick Generating Station Environmental Noise Assessment Final Report (February, 1991)
2. Point Pleasant Pumping Facilities Operational Environmental Noise Assessment Report (December, 1989)
3. Bradshaw Reservoir Pumping Facilities Environmental Noise Assessment Final Report (March, 1991).

With all noise issues raised by the NRC in the Final Environmental Statement for the Limerick Generating Station Operating License (FES-OL) addressed, Section 4.2.4 may be deleted in its entirety.

Section 5.2 Records Retention

A revision is proposed to change the requirement of log and data retention and retention timeframe from the "life of the station" to "until the date of termination of the operating license."

The justification presented in Section 4.1 of this LAR is applicable to Limerick. This section requires retention of records relative to the environmental aspects of plant operation and modifications determined to potentially affect the continued protection of the environment. An administrative requirement to maintain logs is deleted. The requirement to maintain all records

is maintained. There are no dedicated environmental logs maintained on site. Logs relative to the environment are required to be documented by specific State permits (i.e., NPDES Permit) and EGC environmental administrative procedures. Such entries are maintained as part of station operating logs. The reference to environmental logs has been deleted for clarity but the purpose of the original statement is maintained.

The proposed change in the retention timeframe to the termination of the operating license makes the requirement consistent with similar requirements in other regulations (i.e., 10 CFR 50.59). This change has been proposed to provide clarity but does not change the objective of the requirement.

Section 5.4.1 Routine Reports

A change is proposed to delete the entire section relating to Routine Reports. The justification presented in Section 4.1 of this LAR is applicable to Limerick. Further justification specific to Limerick is discussed below.

This section requires that an annual environmental operating report be submitted to the NRC by May 1st of each year. The report includes a list of Environmental Protection Plan (EPP) non-compliances and the corrective actions taken to remedy them, a list of all changes in the station design or operation, tests, and experiments made in accordance with Section 3.1 involving potentially significant unreviewed environmental questions, and a list of nonroutine reports submitted in accordance with Subsection 5.4.2 of the EPP.

As previously discussed in Section 4.2 of the EPP, "Environmental Monitoring," no specific environmental monitoring is required. Environmental non-compliances are reported as required by 10 CFR 50.72, "Immediate notification requirements for operating nuclear power reactors," or 10 CFR 72.75, "Reporting requirements for specific events and conditions." Section 10 CFR 50.72(b)(2)(xi) states that the licensee shall notify the NRC as soon as practical and in all cases, within four hours of the occurrence of..."any event or situation, related to the health and safety of the public or onsite personnel, or protection of the environment, for which a news release is planned or notification to other government agencies has been or will be made." Section 10 CFR 72.75(b)(2) states each licensee shall notify the NRC for "any event or situation related to the health and safety of the public or onsite personnel, or protection of the environment, for which a news release is planned or notification to other government agencies has been or will be made." Significant EPP non-compliances and appropriate non-routine reports will be communicated to the NRC under these regulations. Corrective actions for environmental non-compliances are tracked through the stations' Corrective Action Program and completed corrective actions are available to the NRC for review. Changes in the station design or operation, tests, and experiments involving potentially significant unreviewed environmental questions are addressed by the EGC and AmerGen implementing procedures associated with 10CFR 50.59, "Changes, tests and experiments." For activities that involve a change to the Environmental Protection Program, the 50.59 Applicability Review Form and the Exelon 50.59 Resource Manual refer to EGC Environmental Evaluation procedure. When the environmental evaluation indicates that such an activity involves an unreviewed environmental question, a written evaluation is required to be submitted to the NRC and approval must be obtained prior to implementation. When such an activity involves a change to the EPP, a license amendment shall be submitted to the NRC in accordance with 10 CFR 50.90.

All the requirements for the annual report are addressed in 10 CFR 50.72, 10 CFR 72.75, the EGC 10 CFR 50.59 Review Program, Environmental Evaluation Program, or are no longer required. Therefore, Section 5.4.1 may be deleted in its entirety.

Section 5.4.2 Nonroutine Reports

A change is proposed to Section 5.4.2 to revise a "nonroutine event" to be an "unusual or important environmental event."

Currently this section requires written reports to be sent to the NRC within 30 days of occurrence of a nonroutine event. An administrative change is being made to clarify the objective of the section to refer to an "unusual or important environmental event" as described in Section 4.1 of Appendix B. This change is also for consistency with all other EGC and AmerGen stations.

Oyster Creek Nuclear Generating Station

Section 1.1.1.A Fish Kill Monitoring Program

The proposed change in Section 1.1 is to delete the reference to the Annual Environmental Operating Report. This section discusses the reporting requirements for planned shutdowns with the temperature of the intake water below 8.5 degrees C. With the deletion of the Annual Environmental Operating Report in Section 3.5.1, a reference within this section is not required and has been deleted.

Section 1.0 Environmental Monitoring (Bases)

An administrative change is incorporated to delete two paragraphs that had been inadvertently duplicated in this section.

Section 2.1 Unusual or Important Environmental Events

A change is proposed to insert a statement that a duplicate immediate report is not required when an event is reportable under 10 CFR 50.72.

A change is proposed that if an event is reportable under 10 CFR 50.72, "Immediate notification requirements for operating nuclear power reactors," then a duplicate immediate report in accordance with the station's ETS is not required. Requirements are provided in the ETS to report Unusual or Important Environmental Events to the NRC within 24 hours. Unusual and Important Environmental Events are defined as any occurrence of an event that indicates or could result in significant environmental impact causally related to plant operation. Such events shall be recorded and reported to the NRC within 24 hours and followed by a written report.

Similarly, 10 CFR 50.72(b)(2)(xi) states that the licensee shall notify the NRC as soon as practical and in all cases, within four hours of the occurrence of..."any event or situation, related to the health and safety of the public or onsite personnel, or protection of the environment, for which a news release is planned or notification to other government agencies has been or will be made." The change proposed will relieve the administrative burden of making duplicate reports to the NRC for the same event. Follow-up written reports are still required to be submitted in accordance with the ETS.

Section 3.3 Review and Audit

A change is incorporated to reflect that the review and audit frequency will be mandated by the Quality Assurance Topical Report (QATR). The QATR sets the audit and review frequency at two years, which is longer than the current requirement of one year. The two-year frequency is

an administrative change consistent with review and audit requirements at the other Exelon and AmerGen facilities. This is consistent with the requirements of ANS-3-2 /ANSI N18.7-1976 "Administrative controls and quality assurance for the operational phase of nuclear power plants".

Section 3.5.1 Routine Reports

A change to Section 3.5.1 is proposed to delete the entire section relating to Routine Reports. The justification presented in Section 4.1 of this LAR is applicable to Oyster Creek Nuclear Generating Station (Oyster Creek). Further justification specific to Oyster Creek is discussed below.

This section requires an annual environmental operating report to be submitted to the NRC within 90 days after January 1 of each year. The report includes a summary of the results of environmental monitoring required by Section 1 and Section 2 of the ETS. The annual report also includes all non-routine environmental operating reports and the corrective actions taken to remedy them, changes made to state and federal permits and certificates, changes to system design which could involve an environmental impact, and changes to the Environmental Technical Specifications (ETS).

- The results of environmental monitoring required by Section 1.1.1 A, "Fish Kill Monitoring Program," are reported to the NRC in accordance with the Oyster Creek Reportability Reference Manual and 10 CFR 50.72.
- Section 2.1 of the ETS, "Unusual or Important Environmental Events" requires Oyster Creek Nuclear Generating Station to notify the NRC in accordance with Section 3.5.2 of the ETS, "Non-Routine Environmental Operating Reports".
- Environmental non-compliances are reported as required by 10 CFR 50.72, "Immediate notification requirements for operating nuclear power reactors," and corrective actions will be included in the Exelon/AmerGen Corrective Action Program (CAP).
- Changes to the state and federal permits and certificates are reported in accordance with Section 3.5.3.C of this ETS.
- Changes in the station design or operation, tests, and experiments involving potentially significant unreviewed environmental questions are addressed by the EGC and AmerGen implementing procedures associated with 10CFR 50.59, "Changes, tests and experiments." For activities that involve a change to the Environmental Protection Program, the 50.59 Applicability Review Form and the Exelon/AmerGen 50.59 Resource Manual refer to EGC/AmerGen Environmental Evaluation procedure. When the environmental evaluation indicates that such an activity involves an unreviewed environmental question, a written evaluation is required to be submitted to the NRC and approval must be obtained prior to implementation. When such an activity involves a change to the ETS, a license amendment shall be submitted to the NRC in accordance with 10 CFR 50.90.
- Changes to the ETS are documented by 10 CFR 50.90, "Application for amendment of license or construction permit".

All the requirements for the annual report are addressed in 10 CFR 50.72, 10 CFR 72.75, the EGC and AmerGen 10 CFR 50.59 Review Program, or the Environmental Evaluation Program. Therefore, Section 3.5.1 may be deleted in its entirety.

Section 3.5.2 Non-Routine Environmental Operating Reports

This section requires that a prompt report to the NRC shall be submitted in the event that an unusual or important environmental event occurs. Such an occurrence will be reported within

24 hours to the NRC followed by a written report within 30 days. Oyster Creek Nuclear Generating Station is required to notify the NRC in accordance with 10 CFR 50.72, "Immediate notification requirements for operating nuclear power reactors" and therefore a duplicate immediate report in accordance with this section is not necessary. The follow-up written report is still required.

In addition, administrative changes have been made to delete options for telephone, telegraph and facsimile transmission and to correct notification to be made to the NRC instead of the NRC Document Control Desk.

Section 3.5.3.A Change in Environmental Technical Specifications

A change is proposed to delete the requirement to perform a "benefit-cost analysis". The term "benefit-cost analysis" shall be replaced with "justification" for any proposed change in plant design, in plant operation, or in procedures involved in carrying out the Environmental Technical Specifications. The proposed change represents a change in an administrative station requirement and the use of a justification allows for additional flexibility in analyzing changes impacting the ETS. The justification may include a benefit-cost analysis if deemed appropriate by station management.

Section 3.5.3.B Change in Environmental Technical Specifications

A change is proposed to delete the requirement to perform a "benefit-cost analysis" along with the specific requirements to submit the change to the Director of Nuclear Reactor Regulation for review and authorization. 10CFR 50.90, "Application for amendment of license or construction permit," provides requirements for submittal of Technical Specification changes. Section 3.5.3.B is being revised to reference to 10 CFR 50.90.

Section 3.5.3.C Change in Environmental Technical Specifications

The proposed changes in Section 3.5.3.C are to revise the reporting requirements related to approval or changes to the NPDES Permit or State certification.

Currently, this section requires that changes and additions to the NPDES Permit or the State Certification shall be reported to the NRC. This section also requires that a proposed revision be sent to the NRC at the same time as it is submitted to the authorizing agency. However, the NRC relies on the State regulatory agency to regulate these matters, therefore proposed changes will no longer be provided to the NRC. Changes to the NPDES Permit or State Certification will continue to be provided to the NRC within 30 days of approval. The informational paragraph which states that "the NRC will consult with the authorizing agency to determine appropriate actions" for changes to permits and certificates which have been identified to have severe environmental impact, has been deleted. Information related to environmental permits will continue to be available onsite for NRC review.

Section 3.6 Records Retention

Changes are proposed to revise the requirement of log retention and to revise retention timeframe from "the life of the plant" to "until the date of termination of the Operating License."

The justification presented in Section 4.1 of this LAR is applicable to Oyster Creek.

This section requires retention of records and drawings detailing plant design changes made to systems and equipment as described in Section 3.5.3 and records of all environmental surveillance data. An administrative requirement to maintain logs is deleted. The requirement to maintain all records is maintained. There are no dedicated environmental logs maintained on site. Logs relative to the environment are required to be documented by specific State permits (i.e., NPDES Permit), and Exelon/AmerGen environmental administrative procedures; however, the reference to logs has been deleted for clarity.

The proposed change in the retention timeframe to the termination of the operating license makes the requirement consistent with similar requirements in other regulations (i.e., 10 CFR 50.59). This change has been proposed to provide clarity but does not change the objective of the requirement.

Peach Bottom Atomic Power Station, Units 2 and 3

Section 1.2.1 Plant Reviews and Audits

An administrative change is proposed to reference the Quality Assurance Topical Report (QATR). Reviews and audits are required in accordance with Exelon Quality Assurance Program as specified in the Quality Assurance Topical Report. This clarification will provide more accurate detail regarding the location of the information.

Section 1.3.1 Environmental Deviations

The internal notification for an Environmental Deviation has been revised from notification of the Plant Manager or Vice President, to the Plant Manager or designee. This is an administrative change to be consistent with existing Peach Bottom Atomic Power Station (PBAPS) reporting protocol.

Section 1.3.2 Environmental Deviations

A change is proposed to remove the requirements that require the Plant Operations Review Committee to promptly review Environmental Deviations and prepare a report. Additionally, requirements for the Vice President – PBAPS and the Nuclear Safety Review Board to review Environmental Deviations have been deleted. The review and reporting requirements for Environmental Deviations are controlled through the EGC Corrective Action Program. The Corrective Action Program includes requirements for station management reviews, incident investigation, reportablity requirements and corrective actions.

Section 1.3.3 Environmental Deviations

The requirement for the VP-PBAPS to report environmental deviations to the NRC is deleted. Reports to the NRC will be performed in accordance with the Non-Routine Reports section (1.4.2) of the ETS.

Section 1.4.1 Routine Reports

A change is proposed to delete the entire section relating to Routine Reports. The justification presented in Section 4.1 of this LAR is applicable to PBAPS. Further justification specific to PBAPS is discussed below.

This section requires certain environmental monitoring information to be submitted in an annual report. This report includes a reference to environmental monitoring required by Sections 5.6.2 and 5.6.3 of Appendix A of the Operating License, which will continue to be submitted in accordance with Appendix A. It also requires records of data and analysis of special study programs designed to evaluate the impact of plant operation on an environmental parameter, changes to the plant which affect the environmental impact of the facility, and changes to environmental permits and certificates.

Currently, there are no special study programs remaining, however any future programs performed will be regulated by Federal (i.e., the Environmental Protection Agency (EPA)), State, or local agencies. Design changes are addressed by the EGC implementing procedures associated with 10 CFR 50.59, "Changes, tests and experiments." If an environmental evaluation indicates that an activity involves an unreviewed environmental question, or involves a change to the ETS, prior NRC approval must be obtained prior to implementation. Changes to the environmental permits and certificates are reported to the NRC in accordance with Section 1.4.2.2 of this ETS.

All the requirements for the annual report are addressed in Appendix A of the Operating License, the EGC 10 CFR 50.59 Review Program and the Environmental Evaluation Program. Therefore, Section 1.4.1 may be deleted in its entirety.

Section 1.4.2 Non-Routine Reports

Proposed changes to Section 1.4.2.1 are as follows:

- Insert a statement that a duplicate immediate report is not required when an event is reportable under 10 CFR 50.72.
- Revise timeframe to submit a written report from 10 working days to 30 days.
- Delete references to telephone or telegraph.
- Change to annotate that notification to be made to the NRC instead of specifying the Director of the NRC Regional Inspection and Enforcement Office.

This section requires that an Environmental Deviation as defined in Section 1.3.1, shall be made within 24 hours followed by a written report within 10 days. Peach Bottom Atomic Power Station is required to notify the NRC in accordance with 10 CFR 50.72, "Immediate notification requirements for operating nuclear power reactors," and therefore a duplicate immediate report in accordance with this section is not necessary. The follow-up written report is still required.

The time requirement to follow-up Environmental Deviation notifications with a written report within 10 working days has been revised to 30 days to be consistent with other AmerGen and Exelon stations. This is an administrative requirement and will still be done in accordance with 10 CFR 50.4, "Written communications."

In addition, administrative changes are proposed to delete reference to telephone and telegraph to accommodate current and possible future technological changes in communication methods. Notification of non-routine reports shall be made to the NRC instead of specifying the Director of the NRC Regional Inspection and Enforcement Office. This again, is to anticipate the possibility of future organizational changes within the NRC.

Section 1.4.2.2 Reporting Changes to the Plant or Permits

The proposed changes in Section 1.4.2.2 are to revise the reporting requirements related to approval or changes to the permits and certificates required by Federal, State, local and regional authorities.

Currently this section requires that changes and additions to the permits or certificates be reported to the NRC at the same time as they are submitted to the authorizing agency. The NRC relies on the State regulatory agency to regulate these matters; therefore, proposed changes will no longer be provided to the NRC. Changes to the permits or certificates will continue to be provided to the NRC in accordance with 10 CFR 50.4. Information related to environmental permits will continue to be available onsite for NRC review.

Section 1.5.1 Records Retained for 5 years

A change is proposed to remove the reference to log retention.

This section requires retention of records relative to principal maintenance activities of equipment pertaining to environmental impact, Environmental Deviations, periodic checks, inspections and/or calibrations performed, special study programs, and records of changes made to operating procedures, equipment, permits or certificates.

This section requires retention of records relative to the environmental aspects of plant operation and modifications determined to potentially affect the continued protection of the environment. An administrative requirement to maintain logs is deleted for clarity in that there are no dedicated environmental logs maintained at the sites. Records relative to the environment are required to be documented by specific State permits (i.e., NPDES Permit) and Exelon Corporation environmental administrative procedures. Such entries are maintained as part of station operating logs. The reference to environmental logs has been deleted for clarity but the objective of the original statement is maintained.

A requirement to maintain records of special study programs is deleted because there are no remaining special study programs in this Appendix B. Section 1.4.1 of the ETS is deleted as proposed by this submittal; therefore the reference to Section 1.4.1 is deleted in this section.

Section 1.5.2 Records Retained for the Life of the Plant

A change is proposed to revise retention timeframe from "the life of the plant" to "until the date of termination of the operating license." This administrative change is incorporated to acknowledge that records shall be maintained until the termination of the operating license instead of for the life of the plant. The proposed change in the retention timeframe to the termination of the operating license makes the requirement consistent with similar requirements in other regulations (i.e., 10 CFR 50.59). This change has been proposed to provide clarity but does not change the objective of the requirement.

Quad Cities Nuclear Power Station, Units 1 and 2

Section 1.0 Objectives of the Environmental Protection Plan

A change is proposed to remove references to facility construction from Section 1.0. This section contains the objectives of the EPP, which is to provide for protection of the environmental values during construction and operation of the nuclear facility. Construction is

complete at Quad Cities Nuclear Power Station and therefore the reference to construction is deleted.

Section 2.2 Reporting Related to the NPDES Permits and State Certifications

The proposed changes in Section 2.2 are to revise the reporting requirements related to approval or changes to the NPDES Permit or State certification.

Currently this section requires that violations, changes and additions to the NPDES Permit or the State Certification shall be reported to the NRC. This section also requires that a proposed revision be sent to the NRC at the same time as it is submitted to the permitting agency. The NRC relies on the State regulatory agency to regulate these matters. Changes to the NPDES Permit or State Certification will continue to be provided to the NRC within 30 days of approval. Proposed changes will no longer be provided to the NRC. Information related to environmental permits will continue to be available onsite for NRC review.

Section 2.3 Changes Required for Compliance with Other Environmental Regulations

A change is proposed to replace the phrase "which are required to achieve compliance with" with the phrase "that are either regulated or mandated by." This section exempts those changes that are regulated or mandated by other Federal, State, and local environmental regulations from the requirements of Section 2.1. An additional sentence has been added to state, "However, if any environmental impacts of a change are not evaluated under other Federal, State or local environmental regulations, then those impacts are subject to the requirements of Section 2.1." This is an administrative change to improve clarity and understanding and does not change the objective of the original statement.

Section 3.1 Unusual or Important Environmental Events

A change is proposed that if an event is reportable under 10 CFR 50.72, "Immediate notification requirements for operating nuclear power reactors," then a duplicate immediate report in accordance with the station's EPP is not required. Requirements are provided in the EPP to report Unusual or Important Environmental Events to the NRC within 24 hours. Unusual and Important Environmental Events are defined as any occurrence of an event that indicates or could result in significant environmental impact causally related to plant operation. Such events shall be recorded and reported to the NRC within 24 hours and followed by a written report.

Similarly, 10 CFR 50.72(b)(2)(xi) states that the licensee shall notify the NRC as soon as practical and in all cases, within four hours of the occurrence of..."any event or situation, related to the health and safety of the public or onsite personnel, or protection of the environment, for which a news release is planned or notification to other government agencies has been or will be made." The change proposed will relieve the administrative burden of making duplicate reports to the NRC for the same event. Follow-up written reports are still required to be submitted in accordance with the EPP.

Any additional changes detailed are for clarification only.

5.0 REGULATORY ANALYSIS

5.1 No Significant Hazards Consideration Determination

The proposed changes would revise Appendix B, Environmental Protection Plan (Non-Radiological) of the Facility Operating License (FOL) for each unit. These changes will relieve Exelon Generation Company, LLC (EGC) and AmerGen Energy Company, LLC (AmerGen) of the burden of certain environmental reports and delete obsolete program information.

EGC and AmerGen have evaluated the proposed changes to the Appendix B, Environmental Protection Plan using the criteria in 10 CFR 50.92, and have determined that the proposed changes do not involve a significant hazards consideration. The following information is provided to support a finding of no significant hazards consideration.

1. **Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?**

   Response: No. The Environmental Protection Plans (EPPs) are concerned with monitoring the effect that plant operations have on the environment for the purpose of protecting the environment and have no affect on any accident postulated in the Updated Final Safety Analysis Report (UFSAR). Accident probabilities or consequences are not affected in any way by the environmental monitoring and reporting required by the EPPs. The deletion of portions of Appendix B of the FOL will not impact the design or operation of any plant system or component. No environmental protection requirements established by other Federal, State, or local agencies are being reduced by this license amendment request.

   Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. **Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?**

   Response: No. The proposed changes are administrative in nature. Environmental monitoring and reporting have no effect on accident initiation. The deletion of portions of Appendix B of the FOL will not impact the design or operation of any plant system or component. There will be no effect on the types or amount of any effluents released from the plants.

   Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. **Does the proposed change involve a significant reduction in a margin of safety?**

   Response: No. These proposed changes are administrative in nature. Changes in the annual reporting requirements and other administrative revisions in accordance with this submittal have no impact on margin of safety. Environmental evaluations will still be performed, when necessary, on changes to plant design or operations to assess the effect on environmental protection. Review, analysis and investigation of Unusual and

Important Environmental Events will still be performed in accordance with the Exelon and AmerGen Corrective Action Program.

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

5.2 Applicable Regulatory Requirements/Criteria

The proposed changes have been evaluated to determine whether applicable regulations and requirements continue to be met. Exelon and AmerGen have determined that the proposed changes do not require an exemption or relief from any regulatory requirements, other than stated in the FOLs, and do not affect conformance with any General Design Criteria (GDC) differently than described in the UFSAR. The EPP was established during initial plant licensing to monitor terrestrial and aquatic issues such as thermal mixing, steam fog production, potential erosion, cooling tower drift impact, and noise. The regulatory basis for the establishment of the EPP was 10 CFR 50.36b, "Environmental Conditions." This regulation requires that any obligations in the environmental area identified by the NRC during their operating license review be included in an attachment to the license. The conditions are derived from information contained in the environmental report and any supplements to the environmental report submitted, as required, by 10 CFR 51.50 and 51.53.

Exelon and AmerGen remain bounded by other Federal, State, and local agency environmental protection regulations. None of these regulatory requirements will be affected by modifying Appendix B of the respective operating licenses.

6.0 ENVIRONMENTAL EVALUATION

This submittal changes the current EPP requirements with respect to recordkeeping, duplicative reporting, and administrative requirements. The proposed amendments do not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendments meet the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22, "Criterion for categorical exclusion; identification of licensing and regulatory actions eligible for categorical exclusion or otherwise not requiring environmental review," paragraph (c)(10).

Therefore, in accordance with 10 CFR 51.22(b), no environmental impact statement, or environmental assessment need be prepared in connection with the proposed amendment.

7.0 REFERENCES

Letter from U. S. NRC to M. A. Krupa (Entergy Nuclear South), "Grand Gulf Nuclear Station, Unit 1, River Bend Station, Unit 1, Waterford Steam Electric Station, Unit 3, - Issuance of Amendment RE: Revision of the Respective Appendix B, Environmental Protection Plans (EPPs) (Non-Radiological)," dated April 12, 2004

ATTACHMENT 2-A

Markup of Proposed Appendix B Page Changes

BRAIDWOOD STATION

REVISED APPENDIX B PAGES

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APPENDIX B

TO FACILITY OPERATING LICENSE ~~NO. NPF-70~~ NOS. NPF-72 & NPF-77

EXELON GENERATION COMPANY, LLC

BRAIDWOOD STATION UNITS 1 & 2

DOCKET NOS. 50-456 AND 50-457

ENVIRONMENTAL PROTECTION PLAN
~~(NONRADIOLOGICAL)~~
(NON-RADIOLOGICAL)

BRAIDWOOD STATION

UNITS 1 and 2

ENVIRONMENTAL PROTECTION PLAN

(NON-RADIOLOGICAL)

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2.0 Environmental Protection Issues

In the FES-OL dated June, 1984, the staff considered the environmental impacts associated with the operation of the two unit Braidwood Station. No environmental issues were identified which required study or license conditions to resolve environmental concerns and to assure adequate protection of the environment.

2.1 Aquatic Issues

No specific aquatic issues were raised by the staff in the FES-OL.

Aquatic matters are addressed by the effluent limitations, monitoring requirements and the Section 316(b) demonstration requirement contained in the effective NPDES permit issued by the Federal or State permitting authority ~~Illinois Environmental Protection Agency~~. The NRC will rely on these agencies ~~this agency~~ for regulation of matters involving water quality and aquatic biota.

2.2 Terrestrial Issues

No specific terrestrial issues were raised by the staff in the FES-OL.

A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns: (1) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the FES-OL, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or (2) a significant change in effluents or power level or (3) a matter, not previously reviewed and evaluated in the documents specified in (1) of this Subsection, which may have a significant adverse environmental impact.

The licensee shall maintain records of changes in facility design or operation and of tests and experiments carried out pursuant to this Subsection. These records shall include written evaluations which provide bases for the determination that the change, test or experiment does not involve an unreviewed environmental question or constitute a decrease in the effectiveness of this EPP to meet the objectives specified in Section 1.0. ~~The licensee shall include as part of the Annual Environmental Operating Report (per Subsection 5.4.1) brief descriptions, analyses, interpretations, and evaluations of such changes, tests and experiments.~~

3.2 Reporting Related to the NPDES Permit and State Certification

~~Changes to, or renewals of, the NPDES Permit or the State certification shall be reported to the NRC within 30 days following the date the change or renewal is approved. If a permit or certification, in part or in its entirety, is appealed and stayed, the NRC shall be notified within 30 days following the date the stay is granted.~~

~~The licensee shall notify the NRC of changes to the effective NPDES Permit proposed by the licensee by providing NRC with a copy of the proposed change at the same time it is submitted to the permitting agency. The licensee shall provide the NRC a copy of the application for renewal of the NPDES Permit at the same time the application is submitted to the permitting agency.~~

3.3 Changes Required for Compliance with Other Environmental Regulations

Changes in plant design or operation and performance of tests or experiments which are ~~required to achieve compliance with other~~ either regulated or mandated by other Federal, State, and local environmental regulations are not subject to the requirements of Section 3.1. However, if any environmental impacts of a change are not evaluated under other Federal, State, or local environmental regulations, then those impacts are subject to the requirements of Section 3.1.

INSERT

The NRC shall be provided with a copy of the current NPDES permit or State certification within 30 days of approval. Changes to the NPDES permit or State certification shall be reported to the NRC within 30 days of the date the change is approved.

4.0 Environmental Conditions

4.1 Unusual or Important Environmental Events

Any occurrence of an unusual or important event that indicates or could result in significant environmental impact causally related to plant operation shall be recorded and reported to the NRC within 24 hours followed by a written report in accordance with ~~per~~ Subsection 5.4.2. The following are examples: excessive bird impaction events, onsite plant or animal disease outbreaks, mortality or unusual occurrence of any species protected by the Endangered Species Act of 1973, fish kills, increase in nuisance organisms or conditions, and unanticipated or emergency discharge of waste water or chemical substances.

No routine monitoring programs are required to implement this condition.

INSERT

If an event is reportable under 10 CFR 50.72, then a duplicate immediate report under this subsection is not required. However, a follow-up written report is required in accordance with subsection 5.4.2

5.0 Administrative Procedures

5.1 Review and Audit

The licensee shall provide for review and audit of compliance with the EPP. The audits shall be conducted independently of the individual or groups responsible for performing the specific activity. A description of the organization structure utilized to achieve the independent review and audit function and results of the audit activities shall be maintained and made available for inspection.

5.2 Records Retention

Records ~~and logs relative to the environmental aspects of station operation~~ associated with this EPP shall be made and retained in a manner convenient for review and inspection. These records ~~and logs~~ shall be made available to NRC on request.

Records of modifications to station structures, systems and components determined to potentially affect the continued protection of the environment shall be retained ~~for the life of the station.~~ until the date of termination of the operating license All other records, ~~data and logs~~ relating to this EPP shall be retained for five years or, where applicable, in accordance with the requirements of other agencies.

5.3 Changes in Environmental Protection Plan

Requests for changes in the EPP shall include an assessment of the environmental impact of the proposed change and a supporting justification. Implementation

of such changes in the EPP shall not commence prior to NRC approval of the proposed changes in the form of a license amendment incorporating the appropriate revision to the EPP.

5.4 Plant Reporting Requirements

5.4.1 ~~Routine Reports~~ Deleted

~~An Annual Environmental Operating Report describing implementation of this EPP for the previous year shall be submitted to the NRC prior to May 1 of each year. The initial report shall be submitted prior to May 1 of the year following issuance of the operating license. The period of the first report shall begin with the date of issuance of the operating license.~~

~~The Annual Environmental Operating Report shall include:~~

~~(1) A list of all changes in station design or operation, tests, and experiments made in accordance with Subsection 3.1 which involved a potentially significant unreviewed environmental question.~~

~~(2) A list of nonroutine reports submitted in accordance with Subsection 5.4.2.~~

~~(3) A list of EPP noncompliances and the corrective actions taken to remedy them.~~

~~In the event that some results are not available by the report due date, the report shall be submitted noting and explaining the missing results. The missing results shall be submitted as soon as possible in a supplementary report.~~

5.4.2 Nonroutine Reports

A written report shall be submitted to the NRC within 30 days of an occurrence of ~~a nonroutine~~ an unusual or important environmental event. The report shall (a) describe, analyze, and evaluate the event, including extent and magnitude of the impact, and plant operating characteristics, (b) describe the

probable cause of the event, (c) indicate the action taken to correct the reported event, (d) indicate the corrective action taken to preclude repetition of the event and to prevent similar occurrences involving similar components or systems, and (e) indicate the agencies notified and their preliminary responses.

Events reportable under this subsection which also require reports to other Federal, State or local agencies shall be reported in accordance with those reporting requirements in lieu of the requirements of this subsection. The NRC shall be provided a copy of such report at the same time it is submitted to the other agency.

(NO TEXT CHANGES TO THIS PAGE - INCLUDED FOR PAGINATION ONLY)

ATTACHMENT 2-B

Markup of Proposed Appendix B Page Changes

BYRON STATION

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APPENDIX B

TO FACILITY OPERATING LICENSE ~~NO. NPF-37~~ NOS. NPF-37 & NPF-66

EXELON GENERATION COMPANY, LLC

BYRON STATION UNITS 1 & 2

DOCKET NOS. 50-454 AND 50-455

ENVIRONMENTAL PROTECTION PLAN
~~(NONRADIOLOGICAL)~~
(NON-RADIOLOGICAL)

AMENDMENT NO. ~~115~~

BYRON STATION

UNITS 1 AND 2

ENVIRONMENTAL PROTECTION PLAN

(NON-RADIOLOGICAL)

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2.0 Environmental Protection Issues

In the FES-OL dated April 1982, the staff considered the environmental impacts associated with the operation of the two unit Byron Station. Certain environmental issues were identified which required study or license conditions to resolve environmental concerns and to assure adequate protection of the environment.

2.1 Aquatic Issues

No specific aquatic issues were raised by the staff in the FES-OL.

Aquatic matters are addressed by the effluent limitations, monitoring requirements and the Section 316(b) demonstration requirement contained in the effective NPDES permit issued by the ~~Illinois Environmental Protection Agency.~~ Federal or State permitting authority The NRC will rely on ~~this agency~~ these agencies for regulation of matters involving water quality and aquatic biota.

2.2 Terrestrial Issues

The terrestrial issues raised by the staff in the FES-OL were:

(1) Potential impacts of cooling tower emissions on the terrestrial environment (FES-OL Section 5.5.1.1).

(2) Potential increased noise level impacts in the vicinity of the station (FES-OL Section 5.12).

NRC requirements with regard to the terrestrial issues are specified in Subsection 4.2 of this EPP.

(NO TEXT CHANGES TO THIS PAGE - INCLUDED FOR PAGINATION ONLY)

A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns: (1) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the FES-OL, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or (2) a significant change in effluents or power level or (3) a matter, not previously reviewed and evaluated in the documents specified in (1) of this Subsection, which may have a significant adverse environmental impact.

The licensee shall maintain records of changes in facility design or operation and of tests and experiments carried out pursuant to this Subsection. These records shall include written evaluations which provide bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question or constitute a decrease in the effectiveness of this EPP to meet the objectives specified in Section 1.0. ~~The licensee shall include as part of the Annual Environmental Operating Report (per Subsection 5.4.1) brief descriptions, analyses, interpretations, and evaluations of such changes, tests and experiments.~~

3.2 Reporting Related to the NPDES Permit and State Certification

~~Changes to, or renewals of, the NPDES Permit or the State certification shall be reported to the NRC within 30 days following the date the change or renewal is approved. If a permit or certification, in part or in its entirety, is appealed and stayed, the NRC shall be notified within 30 days following the date the stay is granted.~~

~~The licensee shall notify the NRC of changes to the effective NPDES Permit proposed by the licensee by providing NRC with a copy of the proposed change at the same time it is submitted to the permitting agency. The licensee shall provide the NRC a copy of the application for renewal of the NPDES Permit at the same time the application is submitted to the permitting agency.~~

3.3 Changes Required for Compliance with Other Environmental Regulations

Changes in plant design or operation and performance of tests or experiments which are ~~required to achieve compliance with other~~ either regulated or mandated by other Federal, State, and local environmental regulations are not subject to the requirements of Section 3.1. However, if any environmental impacts of a change are not evaluated under other Federal, State, or local environmental regulations, then those impacts are subject to the requirements of Section 3.1.

INSERT

The NRC shall be provided with a copy of the current NPDES permit or State certification within 30 days of approval. Changes to the NPDES permit or State certification shall be reported to the NRC within 30 days of the date the change is approved.

If an event is reportable under 10 CFR 50.72, then a duplicate immediate report under this subsection is not required. However, a follow-up written report is required in accordance with Subsection 5.4.2.

4.0 Environmental Conditions

4.1 Unusual or Important Environmental Events

INSERT

Any occurrence of an unusual or important event that indicates or could result in significant environmental impact causally related to plant operation shall be recorded and reported to the NRC within 24 hours followed by a written report per Subsection 5.4.2. The following are examples: excessive bird impaction events, onsite plant or animal disease outbreaks, mortality or unusual occurrence of any species protected by the Endangered Species Act of 1973, fish kills, increase in nuisance organisms or conditions, and unanticipated or emergency discharge of waste water or chemical substances.

No routine monitoring programs are required to implement this condition.

4.2 Environmental Monitoring

4.2.1 ~~Aerial Remote Sensing~~ Deleted

INSERT

~~Vegetative communities of an area of approximately 1 km radius centered at the Byron Station shall be aerially photographed using false color infrared film in order to detect and assess the effect, or lack of effect, related to cooling tower drift deposition.~~

~~Photographs will be taken at a scale of 1 inch to 500 feet to provide the necessary detail to enable identification of vegetative damage over relatively small areas of terrain. Some circumstances may warrant inspection of photographs discerning individual trees. Photographs shall be compared with baseline~~

The terrestrial monitoring programs 4-1 identified in Subsections 2.2(1) and 2.2(2) have been completed and no further monitoring under these programs is required.

to ascertain changes in vegetation. A consulting plant pathologist will examine and analyze the photographs to determine possible stressed foliage based on color signature differences. The consulting plant pathologist will conduct a field survey of suspect areas to identify the cause of any stressed vegetation that may be present.

The aerial photographic monitoring will be done between August 15 and September 15 once before the station goes into operation and during the first summer after the station has been in operation for one year. The program shall be repeated in the August 15-September 15 interval once the following year and alternate years for three additional periods.

A report shall be submitted as part of the annual report following each aerial photographic monitoring period. The report shall contain a description of the program, results and interpretive analyses of environmental effects, if any. In addition one set of color transparencies encompassing the 1 km radius of the cooling tower will be submitted.

4.2.2 ~~Confirmatory Sound Level Survey~~ Deleted

~~Surveys~~ shall be conducted to quantify the operational sound levels ~~that~~ exist at various locations around the site. The operational sound level surveys shall be conducted as soon as practicable during the operational phase of the facility, when the cooling towers are operating with their design water flow rates. ~~Surveys~~ shall be conducted for both one unit normal operation and again for two-unit normal operation.

For each of the surveys, sound level data shall be collected at several sites, the exact number and location to be selected by the licensee after consideration of (1) existing onsite and nearby offsite noise sources and barriers, and (2) noise sensitive land uses in the site vicinity (e.g., residences, schools, churches, cemeteries, hospitals, parks).

Each survey shall include data collected from each sampling site during the time of the year when foliage of deciduous trees is present and also from the time of year when such foliage is largely absent. Data collected from each sampling site shall encompass both the daytime and the nighttime periods. Sampling shall include the identification of pure tones, if any, emanating from plant equipment during the operational phase.

The selection, calibration and use of equipment, conduct of the surveys, and the analysis and reporting of data shall conform to the provisions of the applicable American National Standards Institute Standards. The conduct of the surveys shall be similar such that the results are comparable.

The results of the surveys conducted under this program shall be summarized, interpreted and reported in accordance with Section 5.4.1 of this EPP. The results shall include, for each sampling location for each survey, the daytime and nighttime equivalent sound levels, octave band sound, and the range of sound levels recorded. A description of the pure tones found, if any, and their sources shall also be included in the results.

The final report of this program shall present a brief assessment by the licensee of the environmental impact of plant operation on the offsite acoustic environment, and shall describe the proposed mitigative measures, if any, to be taken to reduce the impact of plant noise levels on the offsite environment. This report shall also contain a list of all noise-related complaints or inquiries received by Commonwealth Edison Company concerning the Byron Station subsequent to issuance of the operating license along with a description of the action taken by CECo to resolve these complaints or inquiries.

This program shall terminate upon completion of the collection of the specified sound level data for each phase and submission of an acceptable final report.

5.0 Administrative Procedures

5.1 Review and Audit

The licensee shall provide for review and audit of compliance with the EPP. The audits shall be conducted independently of the individual or groups responsible for performing the specific activity. A description of the organization structure utilized to achieve the independent review and audit function and results of the audit activities shall be maintained and made available for inspection.

5.2 Records Retention

Records ~~and logs relative to the environmental aspects of station operation~~ associated with this EPP shall be made and retained in a manner convenient for review and inspection. These records ~~and logs~~ shall be made available to NRC on request.

Records of modifications to station structures, systems and components determined to potentially affect the continued protection of the environment shall be retained ~~for the life of the station.~~ until the date of termination of the operating license All other records, ~~data and logs~~ relating to this EPP shall be retained for five years or, where applicable, in accordance with the requirements of other agencies.

5.3 Changes in Environmental Protection Plan

Requests for changes in the EPP shall include an assessment of the environmental impact of the proposed change and a supporting justification. Implementation

of such changes in the EPP shall not commence prior to NRC approval of the proposed changes in the form of a license amendment incorporating the appropriate revision to the EPP.

5.4 Plant Reporting Requirements

5.4.1 ~~Routine Reports~~ Deleted

~~An~~ Annual Environmental Operating Report describing implementation of this EPP for the previous year shall be submitted to the NRC prior to May 1 of each year. The initial report shall be submitted prior to May 1 of the year following issuance of the operating license. The period of the first report shall begin with the date of issuance of the operating license.

The report shall include summaries and analyses of the results of the environmental protection activities required by Subsection 4.2 of this EPP for the report period, including a comparison with related preoperational studies, operational controls (as appropriate), and previous non-radiological environmental monitoring reports, and an assessment of the observed impacts of the plant operation on the environment. If harmful effects or evidence of trends toward irreversible damage to the environment are observed, the licensee shall provide a detailed analysis of the data and a proposed course of mitigating action.

The Annual Environmental Operating Report shall also include:

(1) A list of EPP noncompliances and the corrective actions taken to remedy them.

(2) A list of all changes in station design or operation, tests, and experiments made in accordance with Subsection 3.1 which involved a potentially significant unreviewed environmental question.

(3) A list of nonroutine reports submitted in accordance with Subsection 5.4.2.

In the event that some results are not available by the report due date, the report shall be submitted noting and explaining the missing results. The missing results shall be submitted as soon as possible in a supplementary report.

5.4.2 Nonroutine Reports

A written report shall be submitted to the NRC witnin 30 days of occurrence of an unusual or important environmental event. ~~a nonroutine event.~~ The report shall (a) describe, analyze, and evaluate the event, including extent and magnitude of the impact, and plant operating

characteristics, (b) describe the probable cause of the event, (c) indicate the action taken to correct the reported event, (d) indicate the corrective action taken to preclude repetition of the event and to prevent similar occurrences involving similar components or systems, and (e) indicate the agencies notified and their preliminary responses.

Events reportable under this subsection which also require reports to other Federal, State or local agencies shall be reported in accordance with those reporting requirements in lieu of the requirements of this subsection. The NRC shall be provided a copy of such report at the same time it is submitted to the other agency.

(NO TEXT CHANGES TO THIS PAGE - INCLUDED FOR PAGINATION ONLY)

ATTACHMENT 2-C

Markup of Proposed Appendix B Page Changes

CLINTON POWER STATION

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CLINTON POWER STATION

UNIT NO. 1

ENVIRONMENTAL PROTECTION PLAN

(NON-RADIOLOGICAL)

DOCUMENT CONTROL
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CLINTON POWER STATION

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1.0 OBJECTIVES OF THE ENVIRONMENTAL PROTECTION PLAN

The Environmental Protection Plan (EPP) ~~is to~~ provides for protection of non-radiological environmental values during operation of the nuclear facility. The principal objectives of the EPP are as follows:

(a) Verify that the Plant is operated in an environmentally acceptable manner, as established by the Final Environmental Statement-Operating License Stage* (FES-OL) and other NRC environmental impact assessments.

(b) Coordinate NRC requirements and maintain consistency with other Federal, State, and local requirements for environmental protection.

(c) Keep NRC informed of the environmental effects of facility ~~construction and~~ operation and of action taken to control those effects.

Environmental concerns identified in the FES-OL which relate to water quality matters are regulated by way of the licensee's NPDES permit.

*Final Environmental Statement related to the operation of Clinton Power Station, Unit No. 1. NUREG-0854, May 1982 (FES-OL).

2.0 ENVIRONMENTAL PROTECTION ISSUES

In the FES-OL dated May 1982, the staff considered the environmental impacts associated with the operation of the Clinton Power Station. Certain environmental issues were identified which required study or license conditions to resolve environmental concerns and to assure adequate protection of the environment.

2.1 Aquatic Issues

(a) Effluent limitations and aquatic monitoring requirements are contained in the effective NPDES permit issued by the Federal or State permitting authority ~~Illinois Environmental Protection Agency (IL0036919).~~ The NRC will rely on ~~this agency~~ for regulation of these matters involving ~~as they involve~~ water quality and aquatic biota. (these agencies)

(b) One specific aquatic issue raised by the staff concerned the potential for the establishment of encephalitic human pathogenic thermophilic amoeba in Clinton Lake after power generation begins. The NRC will rely on the licensee to conduct monitoring in accordance with the recommendations of the Illinois Department of Public Health as stated in the FES-OL.

2.2 Terrestrial Issues

Steam fog from the station's cooling lake has the potential of reducing visibility over nearby roads and bridges. A fog monitoring program shall be initiated to determine the frequency and density of cooling lake-induced fog which could potentially cause highway safety hazards adjacent to the cooling lake. The NRC shall rely on the licensee to conduct a fog monitoring program in cooperation with the Illinois Department of Transportation and local highway safety officials as stated in the FES-OL.

2.3 Atomic Safety Licensing Board Ordered Unit 2 Issues

In the event of harmful effects or evidence of trends toward irreversible damage to the environment due to the Unit 2 excavation, the NRC will be provided with a detailed analysis of data and proposed course of action to alleviate the problem.

(NO TEXT CHANGES TO THIS PAGE - INCLUDED FOR PAGINATION ONLY)

3.0 CONSISTENCY REQUIREMENTS

3.1 Plant Design and Operation

The licensee may make changes in plant design or operation or perform tests or experiments affecting the environment provided such changes, tests or experiments do not involve an unreviewed environmental question, and do not involve a change in the EPP.* Changes in plant design or operation and performance of tests or experiments which do not affect the environment are not subject to the requirements of this EPP. Activities governed by Section 3.3 are not subject to the requirements of this section.

Before engaging in additional construction or operational activities which may affect the environment, the licensee shall prepare and record an environmental evaluation of such activity if the activity has measurable environmental effects which are not confined to onsite areas previously disturbed during site preparation and plant construction. When the evaluation indicates that such activity involves an unreviewed environmental question, the licensee shall provide a written evaluation of such activities and obtain prior approval from the Nuclear Regulatory Commission. When such activity involves a change in the EPP, such activity and change to the EPP may be implemented only in accordance with an appropriate license amendment as set forth in Section 5.3 of this EPP.

A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns (1) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the FES-OL as modified by staff's testimony to the Atomic Safety and Licensing Board, supplements to the FES-OL, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or (2) a significant change in effluents or power level or (3) a matter not previously reviewed and

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* This provision does not relieve the licensee of the requirements of 10 CFR 50.59.

(NO TEXT CHANGES TO THIS PAGE - INCLUDED FOR PAGINATION ONLY)

The NRC shall be provided with a copy of the current NPDES permit or State certification within 30 days of approval. Changes to the NPDES permit or State certification shall be reported to the NRC within 30 days of the date the change is approved.

INSERT

evaluated in the documents specified in (1) of this Subsection, which may have a significant adverse environmental impact.

The licensee shall maintain records of changes in plant design or operation and of tests and experiments carried out pursuant to this Subsection. These records shall include written evaluations which provide bases for the determination that the change, test or experiment does not involve an unreviewed environmental question nor constitute a decrease in the effectiveness of this EPP to meet the objectives specified in Section 1.0. ~~The licensee shall include as part of the Annual Environmental Operating Report (per Subsection 5.4.1) brief descriptions, analyses, interpretations, and evaluations of such changes, tests and experiments.~~

3.2 Reporting Related to the NPDES Permits and State Certification

~~Modification to the NPDES permit or the State certification pursuant to Section 401 of the Clean Water Act shall be reported to the NRC within 30 days following the date the modified permit is reissued. If a permit or certification, in part or in its entirety, is appealed and stayed, the NRC shall be notified within 30 days following the date the stay is granted.~~

The NRC shall be notified of ~~modifications~~ proposed by the licensee to the effective NPDES permit by providing NRC with a copy of the proposed modification at the same time it is submitted to the permitting agency. The notification of a licensee-initiated modification shall include a copy of the requested modification submitted to the permitting agency. The licensee shall provide the NRC with a copy of its application for reissuance of the NPDES permit at the same time the application is submitted to the permitting agency.

3.3 Changes Required for Compliance with Other Environmental Regulations

Changes in plant design or operation and performance of tests or experiments that are either regulated or mandated by ~~required to achieve compliance with~~ other Federal, State, or local environmental regulations are not subject to requirements of Section 3.1. However, if an environmental impact of a change is not evaluated under other Federal, State, or local environmental regulations, then the impact is subject to the requirements of Section 3.1.

If an event is reportable under 10 CFR 50.72, then a duplicate immediate report under this section is not required. However, a follow-up written report is required in accordance with Section 5.4

INSERT

4.0 ENVIRONMENTAL CONDITIONS

4.1 Unusual or Important Environmental Events

Any occurrence of an unusual or important event that indicates or could result in significant environmental impact causally related to station operation shall be recorded and promptly reported to the NRC within 24 hours ~~by telephone, telegraph or facsimile transmissions~~ followed by a written report per ~~Subsection 5.4.2.~~ Section 5.4. The following are examples: excessive bird impaction events, onsite plant or animal disease outbreaks, mortality or unusual occurrence of any species protected by the Endangered Species Act of 1973, significant fish kills, increase in nuisance organisms or conditions and unanticipated or emergency discharge of waste water or chemical substances.

4.2 Environmental Monitoring

Environmental monitoring programs are conducted in accordance with the guidance and controls of agencies outside the Nuclear Regulatory Commission (NRC). The NRC has recognized ~~these~~ the Federal or State ~~agencies (Illinois Environmental Protection Agency, Illinois Department of Public Health, and Illinois Department of Transportation)~~ permitting authority as the authorities having jurisdiction in Section 2.0 of this EPP. Therefore, no specific environmental monitoring is required by the NRC under this EPP.

5.0 ADMINISTRATIVE PROCEDURES

5.1 Review and Audit

The licensee shall provide for review and audit of compliance with the EPP. The audits shall be conducted independently of the individual or groups responsible for performing the specific activity. A description of the organization structure utilized to achieve the independent review and audit function and results of the audit activities shall be maintained and made available for inspection.

5.2 Records Retention

The documentation listed below shall be made and retained in a manner convenient for review and inspection by the NRC. This documentation shall be retained as indicated below and made available to the NRC upon request.

(a) Records of modifications to plant structures, systems, and components determined to potentially affect the continued protection of the environment ~~(life of the plant).~~ (until the date of termination of the operating license).

(b) Records and procedures, ~~data, and logs~~ relating to this EPP (5 years).

(c) ~~Preoperational environmental monitoring records, procedures, data and logs (5 years).~~

(d) ~~All other records and logs relative to the environmental aspects of plant operation (5 years).~~

5.3 Changes in Environmental Protection Plan

Requests for changes in the EPP shall include an assessment of the environmental impact of the proposed change and a supporting justification. Implementation of such changes in the EPP shall not commence prior to NRC approval of the proposed changes in the form of a licensee amendment incorporating the appropriate revision to the EPP.

INSERT

All other records and procedures relating to this EPP (5 years, or where applicable, in accordance with the requirements of other agencies).

5.4 Plant Reporting Requirements

~~5.4.1 Routine Reports~~

An Annual Environmental Operating Report describing implementation of this EPP for the previous year shall be submitted to the NRC prior to May 1 of each year. The initial report shall be submitted prior to May 1 of the year following issuance of the operating license. The period of the first report shall begin with the date of issuance of the operating license for Unit One.

The Annual Environmental Operating Report shall include:

(a) A list of EPP noncompliances and the corrective actions taken to remedy them.

(b) A list of all changes in station design or operation, tests, and experiments made in accordance with Subsection 3.1 which involved a potentially significant unreviewed environmental issue.

(c) A list of nonroutine reports submitted in accordance with Subsection 5.4.2.

(d) Any results and/or assessments for the environmental monitoring programs described in Subsection 2.0 of this EPP which were submitted to the respective regulatory agencies during the annual reporting period.

If harmful effects or evidence of trends towards irreversible damage to the environment are observed, the licensee shall provide a detailed analysis of the data and a proposed course of action to alleviate the problem.

In the event that some results are not available by the report due date, the report shall be submitted noting and explaining the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

~~5.4.2 Nonroutine Reports~~

A written report shall be submitted to the NRC within 30 days of occurrence of ~~a nonroutine event~~ an unusual or important environmental event. The report shall (a) describe, analyze, and evaluate the event, including extent and magnitude of ~~there~~ the impact and plant operating characteristics, (b) describe the probable cause of the event, (c) indicate the action taken to correct the reported event, (d) indicate the corrective action taken to preclude repetition of the event and to prevent similar occurrences involving similar components or systems, and (e) indicate the agencies notified and their preliminary responses.

Events reportable under this subsection which also required reports to other Federal, State, or local agencies shall be reported in accordance with those reporting requirements in lieu of the requirements of this subsection. The NRC shall be provided with a copy of each report at the same time it is submitted to the other agency.

ATTACHMENT 2-D

Markup of Proposed Appendix B Page Changes

LASALLE COUNTY STATION

REVISED APPENDIX B PAGES

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1.0 OBJECTIVE OF THE ENVIRONMENTAL PROTECTION PLAN

The Environmental Protection Plan (EPP) ~~is to~~ provides for protection of environmental values during ~~construction and~~ operation of the nuclear facility. The principal objectives of the EPP are as follows:

(1) Verify that the Plant is operated in an environmentally acceptable manner, as established by the FES and other NRC environmental impact assessments.

(2) Coordinate NRC requirements and maintain consistency with other Federal, State and local requirements for environmental protection.

(3) Keep NRC informed of the environmental effects of facility ~~construction and~~ operation and of action taken to control those effects.

Environmental concerns identified in the FES which relate to water quality matters are regulated by way of the licensee's NPDES permit.

Aquatic issues identified in items 1 and 2 above are addressed by the effluent limitations, monitoring requirements and the Section 316(b) demonstration requirement contained in the effective NPDES permit issued by ~~the Illinois Environmental Protection Agency~~ the Federal or State permitting authority. The NRC will rely on ~~this agency for~~ these agencies for regulation of these matters as they involve water quality and aquatic biota. The aquatic issued identified in item 3 above has been addressed in correspondence between the NRC and the State of Illinois. The State has been appraised of the intention of the NRC not to include this monitoring and mitigation requirements in this facility license. The NRC will rely on the State of Illinois for the establishment and conduct of this program. This action has been taken in accordance with Section 511(c)(2) of the Clean Water Act which places responsibility for establishment and enforcement of programs for the protection of the aquatic environment with the U.S. Environmental Protection Agency or state(s) granted authority for such programs under the Act.

2.2 Terrestrial Issues

Potential erosion effects along the dike around the cooling lake and the banks of Armstrong Run are addressed in the regulatory requirements of the dam permit issued by the State permitting authority.

~~NRC requirements with regard to the terrestrial issues are specified in Subsection 4.2 of this EPP.~~

The NRC will rely on this state agency for regulation of these matters.

A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns (1) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the final environmental statement (FES) as modified by staff's testimony to the Atomic Safety and Licensing Board, supplements to the FES, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or (2) a significant change in effluents or power level or (3) a matter not previously reviewed and evaluated in the documents specified in (1) of this Subsection, which may have a significant adverse environmental impact.

The licensee shall maintain records of changes in the plant design or operation and of tests and experiments carried out pursuant to this Subsection. These records shall include a written evaluation which provide bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question nor constitute a decrease in the effectiveness of this EPP to meet the objectives specified in Section 1.0. ~~The licensee shall include as part of his Annual Environmental Operating Report (per Subsection 5.4.1) brief descriptions, analyses, interpretations, and evaluations of such changes, tests and experiments.~~

3.2 Reporting Related to the NPDES Permits and State Certification

The licensee shall provide the NRC with copies of the results of the special studies conducted in accordance with the Clean Water Act, at the same time they are submitted to the permitting agency, namely, the Demonstration Study pursuant to Section 316(b) of the Clean Water Act.

~~the special studies conducted in accordance with the Clean Water Act, at the same time they are submitted to the permitting agency, namely, the Demonstration Study~~ pursuant to Section 316(b) of the Clean Water Act.

Changes and additions to the NPDES permit or the State certification shall be reported to the NRC within 30 days following the date the change is approved. If a permit or certification, in part or in its entirety, is appealed and stayed, the NRC shall be notified within 30 days following the date the stay is granted.

The NRC shall be notified of changes proposed by the licensee to the effective NPDES permit by providing NRC with a copy of the proposed change at the same time it is submitted to the permitting agency. The notification of a licensee-initiated change shall include a copy of the requested revision submitted to the permitting agency. The licensee shall provide the NRC with a copy of its application for renewal of the NPDES permit at the same time the application is submitted to the permitting agency.

3.3 Changes Required for Compliance with Other Environmental Regulations

Changes in plant design or operation and performance of tests or experiments ~~that are either regulated or mandated by required to achieve compliance with~~ other Federal, State, or local environmental regulations are not subject to requirements of Section 3.1. However, if any environmental impacts of a change are not evaluated under other Federal, State, or local environmental regulations, then those impacts are subject to the requirements of Section 3.1.

INSERT

The NRC shall be provided with a copy of the current NPDES permit or State certification within 30 days of approval. Changes to the NPDES permit or State certification shall be reported to the NRC within 30 days of the date the change is approved.

If an event is reportable under 10 CFR 50.72, then a duplicate immediate report under this subsection is not required. However, a follow-up written report is required in accordance with subsection 5.4.2.

4.0 ENVIRONMENTAL CONDITIONS

4.1 Unusual or Important Environmental Events

INSERT

Any occurrence of an unusual or important event that indicates or could result in significant environmental impact ~~casually~~ causally related to station operation shall be recorded and promptly reported to the NRC within 24 hours ~~by telephone, telegraph or facsimile transmissions~~ followed by a written report per Subsection 5.4.2. The following are examples: excessive bird impaction events, onsite plant or animal disease outbreaks, mortality or unusual occurrence of any species protected by the Endangered Species Act of 1973, fish kills, increase in nuisance organisms or conditions and unanticipated or emergency discharge of waste water or chemical substances.

No routine monitoring programs are required to implement this condition.

4.2 Environmental Monitoring

~~4.2.1 Vegetative Integrity on Cooling Pond Dike~~

INSERT

~~A stable~~ vegetative cover will inhibit erosion of the dike during intense ~~rainstorms;~~ therefore, a program ~~of monitoring~~ vegetative integrity ~~and~~ erosion with subsequent remedial actions ~~will minimize erosion damage~~. Should significant and ~~increasing~~ damage occur, further remedial action may be required.

Environmental monitoring programs are conducted in accordance with the guidance and controls of agencies outside of the NRC. The NRC has recognized the Federal or State agencies as the authorities having jurisdiction in Section 2.0 of this EPP. Therefore, no specific environmental monitoring is required by the NRC under this EPP.

The monitoring program consists of a visual inspection of the vegetative integrity on the outer face of the peripheral cooling pond dike at the beginning of the spring planting season (May) and at the beginning of the fall planting season (August). If a failure of the vegetative cover is discovered by inspection, the affected area shall be reseeded during the succeeding plant season.

5.0 ADMINISTRATIVE PROCEDURES

5.1 Review and Audit

The licensee shall provide for review and audit of compliance with the Environmental Protection Plan. The audits shall be conducted independently of the individual or groups responsible for performing the specific activity. A description of the organization structure utilized to achieve the independent review and audit function and results of the audit activities shall be maintained and made available for inspection.

5.2 Records Retention

Records ~~and logs relative to the environmental aspects of plant operation~~ associated with this EPP shall be made and retained in a manner convenient for review and inspection. These records ~~and logs~~ shall be made available to NRC on request.

Records of modifications to plant structures, systems and components determined to potentially affect the continued protection of the environment shall be retained ~~for the life of the plant.~~ until the date of the termination of the operating license. All other records and data ~~and logs~~ relating to this EPP shall be retained for five years or, where applicable, in accordance with the requirements of other agencies.

5.3 Changes in Environmental Protection Plan

Requests for changes in the Environmental Protection Plan shall include an assessment of the environmental impact of the proposed change and a support justification. Implementation of such changes in the EPP shall not commence prior to NRC approval of the proposed changes in the form of a licensee amendment incorporating the appropriate revision to the Environmental Protection Plan.

5.4 Station Reporting Requirements

5.4.1 Routine Reports Deleted

~~An Annual Environmental Operating Report describing implementation of this EPP for the previous year shall be submitted to the NRC prior to May 1 of each year. The initial report shall be submitted prior to May 1 of the year following issuance of the operating license. The period of the first report shall begin with the date of issuance of the operating license for the first operational unit.~~

~~The report shall include summaries and analyses of the results of the environmental protection activities required by Subsection 4.2 of this Environmental Protection Plan for the report period, including a comparison with preoperational studies, operational controls (as appropriate), and previous non-radiological environmental monitoring reports, and an assessment of the observed impacts of the station operation on the environment. If harmful effects or evidence of trends toward irreversible damage to the environment~~

are observed, the licensee shall provide a detailed analysis of the data and a proposed course of action to alleviate the problem.

The Annual Environmental Operating Report shall also include:

(a) A list of EPP noncompliances and the corrective actions taken to remedy them.

(b) A list of all changes in station design or operation, tests, and experiments made in accordance with Subsection 3.1 which involved a potentially significant unreviewed environmental issue.

(c) A list of nonroutine reports submitted in accordance with Subsection 5.4.2.

In the event that some results are not available by the report due date, the report shall be submitted noting and explaining the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

5.4.2 Nonroutine Reports

A written report shall be submitted to the NRC within 30 days of occurrence of an unusual or important environmental ~~nonroutine~~ event. The report shall (a) describe, analyze, and evaluate the event, including extent and magnitude of these impact and plant operating characteristics, (b) describe the probable cause of the event, (c) indicate the action taken to correct the reported event, (d) indicate the corrective action taken to preclude repetition of the event and to prevent similar

occurrences involving similar components or systems and (e) indicate the agencies notified and their preliminary responses.

Events reportable under this subsection which also require reports to other Federal, State, or local agencies shall be reported in accordance with those reporting requirements in lieu of the requirements of this subsection. The NRC shall be provided with a copy of each report at the same time it is submitted to the other agency.

(NO TEXT CHANGES TO THIS PAGE - INCLUDED FOR PAGINATION ONLY)

ATTACHMENT 2-E

Markup of Proposed Appendix B Page Changes

LIMERICK GENERATING STATION UNIT 1

REVISED APPENDIX B PAGES

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APPENDIX B

TO FACILITY OPERATING LICENSE NO. NPF-39

LIMERICK GENERATING STATION

UNITS 1 ~~AND 2~~

EXELON GENERATION COMPANY, LLC

DOCKETS NOS. 50-352 ~~50-353~~

ENVIRONMENTAL PROTECTION PLAN

(NONRADIOLOGICAL)

Amendment No. ~~131~~, 147

LIMERICK GENERATING STATION

UNIT(S) 1 ~~AND 2~~

ENVIRONMENTAL PROTECTION PLAN

(NONRADIOLOGICAL)

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1.0 Objectives of the Environmental Protection Plan

The Environmental Protection Plan (EPP) is to provide for protection of nonradiological environmental values during operation of the nuclear facility. The principal objectives of the EPP are as follows:

(1) Verify that the facility is operated in an environmentally acceptable manner, as established by the Final Environmental Statement - Operating Licensing Stage (FES-OL) and other NRC environmental impact assessments.

(2) Coordinate NRC requirements and maintain consistency with other Federal, State and local requirements for environmental protection.

(3) Keep NRC informed of the environmental effects of facility ~~construction and~~ operation and of actions taken to control those effects.

Environmental concerns identified in the FES-OL which relate to water quality matters are regulated by way of the licensee's NPDES permit.

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(3) Chlorination of station cooling waters for condenser and cooling tower biofouling control may result in some adverse impacts to Schuylkill River biota in the vicinity of the station discharge (FES Section 5.3.2.3)

(4) Operation of the Point Pleasant Diversion will alter the hydrology, aquatic habitats, and water quality of the headwater section of the East Branch of Perkiomen Creek but the diversion waters are expected to provide beneficial dilution of waste loads entering the stream in its middle and lower reaches. (FES Sections 5.3.2.3 and 5.2.2)

(5) The supplemental cooling water withdrawal from Perkiomen Creek using state-of-the-art technology will result in localized effects from entrainment of fish larvae. (FES Section 5.5.2)

2.2 Terrestrial Issues

No specific terrestrial issues were identified by the NRC staff in the FES-OL.

2.3 Noise Issues

(1) Tones from the Point Pleasant pumphouse transformers are predicted to be audible and may cause annoyance at a nearby residence. Noise ~~monitor-~~ monitor-

A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns: (1) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the FES-OL, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or (2) a significant change in effluents or power level; or (3) a matter, not previously reviewed and evaluated in the documents specified in (1) of this Subsection, which may have a significant adverse environmental impact.

The licensee shall maintain records of changes in facility design or operation and of tests and experiments carried out pursuant to this Subsection. These records shall include written evaluations which provide bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question or constitute a decrease in the effectiveness of this EPP to meet the objectives specified in Section 1.0. ~~The licensee shall include as part of the Annual Environmental Operating Report (per Subsection 5.4.1) brief descriptions, analyses, interpretations, and evaluations of such changes, tests and experiments.~~

3.2 Reporting Related to the NPDES Permit and State Certification

Changes to, or renewals of, the NPDES Permits or the State certification shall be reported to the NRC within 30 days following the date the change or renewal is approved. If a permit or certification, in part or in its entirety, is appealed and stayed, the NRC shall be notified within 30 days following the date the stay is granted.

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~~The licensee shall notify the NRC of changes to the effective NPDES Permit proposed by the licensee by providing NRC with a copy of the proposed change at the same time it is submitted to the permitting agency. The licensee shall provide the NRC a copy of the application for renewal of the NPDES Permit at the same time the application is submitted to the permitting agency.~~

3.3 Changes Required for Compliance with Other Environmental Regulations

Changes in plant design or operation and performance of tests or experiments ~~which are required to achieve compliance with other~~ Federal, State, and local environmental regulations are not subject to the requirements of Section 3.1.

that are either regulated or mandated by

However, if any environmental impacts of a change are not evaluated under other Federal, State, or local environmental regulations, then those impacts are subject to the requirements of section 3.1.

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If an event is reportable under 10CFR50.72, then a duplicate immediate report under this subsection is not required. However, a follow-up written report is required in accordance with Subsection 5.4.2.

4.0 Environmental Conditions

4.1 Unusual or Important Environmental Events

Any occurrence of an unusual or important event that indicates or could result in significant environmental impact causally related to plant operation shall be recorded and reported to the NRC within 24 hours followed by a written report per Subsection 5.4.2. The following are examples: excessive bird impaction events, onsite plant or animal disease outbreaks, mortality or unusual occurrence of any species protected by the Endangered Species Act of 1973, fish kills, increase in nuisance organisms or conditions, and unanticipated or emergency discharge of waste water or chemical substances.

No routine monitoring programs are required to implement this condition.

4.2 Environmental Monitoring

4.2.1 Aquatic Monitoring

The certifications and permits required under the Clean Water Act provide mechanisms for protecting water quality and, indirectly, aquatic biota. The NRC will rely on the decisions made by the Commonwealth of Pennsylvania, under the authority of the Clean Water Act, for any requirements for aquatic monitoring.

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4.2.2 Terrestrial Monitoring

No terrestrial monitoring is required.

4.2.3 Maintenance of Transmission Line Corridors

The use of herbicides within the Limerick Generating Station transmission line corridors (Limerick to Cromby, Cromby to Plymouth Meeting, Cromby to North Wales, and Limerick to Whitpain) shall conform to the approved use of selected herbicides as registered by the Environmental Protection Agency and approved by Commonwealth authorities and applied as directed on the pesticide label.

~~Records shall be maintained by the licensee's Electric Transmission and Distribution Department concerning herbicide use. Such records shall include the following information: commercial and chemical names of materials used; concentration of active material in formulations for field use; diluting substances other than water; rates of application; method of application; location; and the date of application. Such records shall be maintained for a period of 5 years from the date they are prepared and shall be made readily available to the NRC upon request. There shall be no routine reporting requirement associated with this condition.~~

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4.2.4 Noise Monitoring

All initial Environmental Noise Assessments have been completed.

~~4.2.4.1 General Requirements for Sound Level Surveys~~

Surveys shall be conducted to quantify the ambient (i.e., background) and the operational sound levels that exist at various locations in the vicinity of the LGS site and supplemental cooling water system facilities, as specified below. The ambient sound level surveys shall be conducted during the time period when significant station or supplemental cooling water system outdoor construction activity has ended, and with no operation of the cooling system or other significant noise sources (e.g., transformers) so that measured sound levels are not affected by such activities. The operational sound level surveys shall be conducted as soon as practicable within the first year of the operational phase of the various station associated facilities, when transformers are energized or when the cooling towers are operating with their design water flow rates, as appropriate for the facility under study. For the LGS site, one survey shall be conducted for one unit normal operation and a second survey for two unit normal operation. The conduct of the surveys for both phases shall be such that the results are comparable.

For each of the surveys, except as otherwise specified below or in LBP-83-11, sound level data shall be collected at several sites, the exact number and location to be selected by the licensee after consideration of (1) existing onsite and nearby offsite noise sources and barriers; (2) noise

The information in subsections 4.2.4.1, 4.2.4.2, 4.2.4.3, and 4.2.4.4 has been deleted. Pages 4-4, 4-5, 4-6, and 4-7 have been removed from this section.

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sensitive land uses in the site vicinity (e.g., residences, schools, churches, cemeteries, hospitals, parks); and (3) previously conducted noise surveys in the site vicinity.

The selection, calibration and use of equipment, conduct of the surveys, and the analysis and reporting of data shall conform to the provisions of the applicable American National Standards Institute Standards.

The results of the surveys conducted under this program shall be summarized, interpreted and reported in accordance with Section 5.4.1 of this EPP.

The final report of this program shall present a brief assessment by the licensee of the environmental impact of plant and supplemental cooling water system operation on the various offsite acoustic environments, and shall describe the mitigative measures, if any, that have been, or are to be taken to reduce the impact of plant or supplemental cooling water system noise levels on the offsite environments. This report shall also contain a list of noise-related complaints or inquiries received by Exelon Generation Company, LLC concerning the Limerick Generating Station or its supplemental cooling water system subsequent to issuance of the operating license along with a description of the action taken by Exelon Generation Company, LLC to resolve these complaints or inquiries.

This program shall terminate upon completion of the collection of the specified sound level data for each phase and submission of an acceptable final report.

4.2.4.2 Point Pleasant Pumphouse

An ASLB ruling (LBP-83-11; March 8, 1983) requires that the licensee conduct a one-time field study after the transformers are placed in operation at Point Pleasant. The noise from operation of the transformers shall be reduced to a level so that the transformer core tones will be inaudible (i.e., not above the masking level, as defined below) at the site boundary.

The licensee shall determine, based on onsite measurements, the delta L(ex) (i.e., the noise level in excess of the masking level) for each tone. The masking level is defined as "N" dB above the ambient spectrum level, where "N" is defined as follows:

Masking Level "N", dB	Tone Frequency, Hz
17.5	120
17.4	240
17.8	360
18.2	480

The steps to be carried out are:

(1) Measure the broadband (nontonal) ambient nighttime (midnight to 4 a.m.) levels in all octave bands of frequency when the transformers are not energized (step A in the ASLB ruling). From these, tone-masking sound levels (thresholds of audibility) at each tone frequency shall be calculated.

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(2) Measure the level of the tones that exist when the transformers are energized (step B) in the one-third-octave bands that contain them for comparison with the calculated masking levels from step A to determine audibility. Transformer tones should not be greater than the masking level for specific one-third-octave bands.

If, for any reason, its not practicable to de-energize the transformers at any time during the prescribed measurement time period (midnight to 4 a.m.), alternative measurements shall be made. In that event, only one measurement of the entire spectrum need be made, but it must be done entirely in one-third-octave bands. Any measured octave band sound level that includes a tone or tones cannot be used to determine the true background ambient sound level for that octave band. In such cases, the background ambient level in any one-third-octave band containing a tone shall be approximated by interpolating between those adjacent one-third-octave band levels that do not contain any tones.

If audible tones, defined as any delta L(ex) value greater than 0, are found at the site boundary, mitigative mesures, such as a three-sided barrier or a full enclosure around the transformers, shall be implemented (and their performance verified by noise measurement) so that tones are not greater than the masking level as previously determined.

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4.2.4.3 Bradshaw Reservoir

The noise measurements proposed for the Point Pleasant site shall be made at the Bradshaw pumphouse site boundary while energized, on the line between the transformers and residences B, D, and F, to determine if the tones would be audible at those points (see Figure 5.6, LGS Final Environmental Statement, NUREG-0974, p. 5-140). Measures to render these tones inaudible at these points shall then be applied, as necessary, and their performance verified. The measurement program recommended for Bradshaw to test for audible tones from the transformers shall also be extended to include audible tones in the 1000-Hz octave band at the southeast site boundary in the direction of residence B.

4.2.4.4 Limerick Site

The operational measurement program to be applied to the Point Pleasant area shall be applied to the area immediately beyond the northern boundary of the Limerick site as well. If audible tones are found to be present at the northern site boundary after Unit 1 transformers are energized, mitigative measures shall be taken and their performance verified, as required for the Bradshaw Reservoir, to cause those tones to be inaudible.

For the LGS site only, data shall be collected from each sampling site during the time of year when foliage of deciduous trees is present and also during the time of year when such foliage is largely absent. Data collected from each sampling location shall encompass both the daytime and nighttime periods.

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5.0 Administrative Procedures

5.1 Review and Audit

The licensee shall provide for review and audit of compliance with the EPP. The audits shall be conducted independently of the individual or groups responsible for performing the specific activity. A description of the organization structure utilized to achieve the independent review and audit function and results of the audit activities shall be maintained and made available for inspection.

5.2 Records Retention

Records associated with this Environmental Protection Plan ~~and logs relative to the environmental aspects of station operation~~ shall be made and retained in a manner convenient for review and inspection. These records ~~and logs~~ shall be made available to NRC on request.

Records of modifications to station structures, systems and components determined to potentially affect the continued protection of the environment shall be retained until the date of termination of the operating license ~~for the life of the station~~. All other records, ~~data and logs~~ relating to this EPP shall be retained for five years or, where applicable, in accordance with the requirements of other agencies.

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5.3 Changes in Environmental Protection Plan

Requests for changes in the EPP shall include an assessment of the environmental impact of the proposed change and a supporting justification. Implementation of such changes in the EPP shall not commence prior to NRC approval of the proposed changes in the form of a license amendment incorporating the appropriate revision to the EPP.

5.4 Plant Reporting Requirements

5.4.1 Routine Reports

(Deleted)

An Annual Environmental Operating Report describing implementation of this EPP for the previous year shall be submitted to the NRC prior to May 1 of each year. The initial report shall be submitted prior to May 1 of the year following issuance of the operating license.

The report shall include summaries and analyses of the results of the environmental protection activities required by Subsection 4.2 of this EPP for the report period, including a comparison with related preoperational studies, operational controls (as appropriate), and previous nonradiological environmental monitoring reports, and an assessment of the observed impacts of the plant operation on the environment. If harmful effects or evidence of trends toward irreversible damage to the environment are observed, the licensee shall provide a detailed analysis of the data and a proposed course of mitigating action.

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The Annual Environmental Operating Report shall also include:

(1) A list of EPP noncompliances and the corrective actions taken to remedy them.

(2) A list of all changes in station design or operation, tests, and experiments made in accordance with Subsection 3.1 which involved a potentially significant unreviewed environmental question.

(3) A list of nonroutine reports submitted in accordance with Subsection 5.4.2.

In the event that some results are not available by the report due date, the report shall be submitted noting and explaining the missing results. The missing results shall be submitted as soon as possible in a supplementary report.

5.4.2 Nonroutine Reports

A written report shall be submitted to the NRC within 30 days of occurrence of ~~a nonroutine~~ an Unusual or Important Environmental event. The report shall (a) describe, analyze, and evaluate the event, including extent and magnitude of the impact, and plant operating characteristics, (b) describe the probable cause of the event, (c) indicate the action taken to correct the reported event, (d) indicate the corrective

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APPENDIX B

TO FACILITY OPERATING LICENSE NO. NPF-85

LIMERICK GENERATING STATION

UNITS ~~1 AND~~ 2

EXELON GENERATION COMPANY, LLC

DOCKETS NOS. ~~50-352,~~ 50-353

ENVIRONMENTAL PROTECTION PLAN

(NON-RADIOLOGICAL)

August 25, 1989

Amendment No. ~~92~~, 108

3893262370

LIMERICK GENERATING STATION

UNITS ~~1 AND~~ 2

ENVIRONMENTAL PROTECTION PLAN

(NON-RADIOLOGICAL)

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1.0 OBJECTIVES OF THE ENVIRONMENTAL PROTECTION PLAN

The Environmental Protection Plan (EPP) is to provide for protection of non-radiological environmental values during operation of the nuclear facility. The principal objectives of the EPP are as follows:

(1) Verify that the facility is operated in an environmentally acceptable manner, as established by the Final Environmental Statement-Operating License Stage (FES-OL) and other NRC environmental impact assessments.

(2) Coordinate NRC requirements and maintain consistency with other Federal, State and local requirements for environmental protection.

(3) Keep NRC informed of the environmental effects of facility ~~construction and~~ operation and of actions taken to control those effects.

Environmental concerns identified in the FES-OL which relate to water quality matters are regulated by way of the licensee's NPDES permit.

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power level; or (3) a matter not previously reviewed and evaluated in the documents specified in (1) of this Subsection, which may have a significant adverse environmental impact.

The licensee shall maintain records of changes in facility design or operation and of tests and experiments carried out pursuant to this Subsection. These records shall include written evaluations which provide bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question or constitute a decrease in the effectiveness of the EPP to meet the objectives specified in Section 1.0. ~~The licensee shall include as part of the Annual Environmental Operating Report (per Subsection 5.4.1) brief descriptions, analyses, interpretations and evaluations of such changes, tests and experiments.~~

3.2 Reporting Related to the NPDES Permit and State Certification

Changes to, or renewals of, the NPDES Permit or the State certification shall be reported to the NRC within 30 days following the date the change or renewal is approved. If a permit or certification, in part or in its entirety, is appealed and stayed, the NRC shall be notified within 30 days following the date the stay is granted.

~~The licensee shall notify the NRC of changes to the effective NPDES Permit proposed by the licensee by providing the NRC with a copy of the proposed change at the same time it is submitted to the permitting agency. The licensee shall provide the NRC a copy of the application for renewal of the NPDES Permit at the same time the application is submitted to the permitting agency.~~

3.3 Changes Required for Compliance with Other Environmental Regulations

Changes in plant design or operation and performance of tests or experiments ~~which are required to achieve compliance with other~~ Federal, State and local environmental regulations are not subject to the requirements of Section 3.1.

that are either regulated or mandated by

However, if any environmental impacts of a change are not evaluated under other Federal, State, or local environmental regulations, then those impacts are subject to the requirements of Section 3.1.

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If an event is reportable under 10 CFR 50.72, then a duplicate immediate report under this subsection is not required. However, a follow-up written report is required in accordance with Subsection 5.4.2.

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4.0 ENVIRONMENTAL CONDITIONS

4.1 Unusual or Important Environmental Events

Any occurrence of an unusual or important event that indicates or could result in significant environmental impact causally related to plant operation shall be recorded and reported to the NRC within 24 hours followed by a written report per Subsection 5.4.2. The following are examples: excessive bird impaction events, onsite plant or animal disease outbreaks, mortality or unusual occurrence of any species protected by the Endangered Species Act of 1973, fish kills, increase in nuisance organisms or conditions, and unanticipated or emergency discharge of waste water or chemical substances.

No routine monitoring programs are required to implement this condition.

4.2 Environmental Monitoring

4.2.1 Aquatic Monitoring

The certifications and permits required under the Clean Water Act provide mechanisms for protecting water quality and, indirectly, aquatic biota. The NRC will rely on the decisions made by the Commonwealth of Pennsylvania, under the authority of the Clean Water Act, for any requirements for aquatic monitoring.

4.2.2 Terrestrial Monitoring

No terrestrial monitoring is required.

4.2.3 Maintenance of Transmission Line Corridors

The use of herbicides within the Limerick Generating Station transmission line corridors (Limerick to Cromby, Cromby to Plymouth Meeting, Cromby to North Wales, and Limerick to Whitpain) shall conform to the approved use of selected herbicides as registered by the Environmental Protection Agency and approved by Commonwealth authorities and applied as directed on the pesticide label.

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~~Records shall be maintained in the licensee's Electric Transmission and Distribution Department concerning herbicide use. Such records shall include the following information: commercial and chemical names of materials used; concentration of active material in formulations for field use; diluting substances other than water; rates of application; method of application; location; and the date of application. Such records shall be maintained for a period of 5 years from the date they are prepared and shall be made readily available to the NRC upon request. There shall be no routine reporting requirement associated with this condition.~~

4.2.4 Noise Monitoring

All initial Environmental Noise Assessments have been completed.

~~4.2.4.1 General Requirements for Sound Level Surveys~~

~~Surveys shall be conducted to quantify the ambient (i.e., background) and the operational sound levels that exists at various locations in the vicinity of the LGS site and supplemental cooling water system facilities, as specified below. The ambient sound level surveys shall be conducted during the time period when significant station or supplemental cooling water system outdoor construction activity has ended, and with no operation of the cooling system or other significant noise sources (e.g., transformers) so that measured sound levels are not affected by such activities. The operational sound level surveys shall be conducted as soon as practicable within the first year of the operational phase of the various station associated facilities, when transformers are energized or when the cooling towers are operating with their design water flow rates, as appropriate for the facility under study. For the LGS site, one survey shall be conducted for one unit normal operation and a second survey for two unit normal operation. The conduct of the surveys for both phases shall be such that the results are comparable.~~

~~For each of the surveys, except as otherwise specified below or in LBP-83-11, sound level data shall be collected at several sites, the exact number and location to be selected by the licensee after consideration of (1) existing onsite and nearby offsite noise sources and barriers; (2) noise sensitive land uses in the site vicinity (e.g., residences, schools, churches, cemeteries, hospitals, parks); and (3) previously conducted noise surveys in the site vicinity.~~

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The information in subsections 4.2.4.1, 4.2.4.2, 4.2.4.3, and 4.2.4.4 has been deleted. Pages 4.3, 4.4, and 4.5 have been removed from this section.

The selection, calibration and use of equipment, conduct of the surveys, and the analysis and reporting of data shall conform to the provisions of the applicable American National Standards Institute Standards.

The results of the surveys conducted under this program shall be summarized, interpreted and reported in accordance with Section 5.4.1 of this EPP.

The final report of this program shall present a brief assessment by the licensee of the environmental impact and supplemental cooling water system operation on the various offsite acoustic environments, and shall describe the mitigative measures, if any, that have been, or are to be taken to reduce the impact of plant or supplemental cooling water system noise levels on the offsite environments. This report shall also contain a list of noise-related complaints or inquiries received by Exelon Generation Company, LLC concerning the Limerick Generating Station or its supplemental cooling water system subsequent to issuance of the operating license along with a description of the action taken by Exelon Generation Company, LLC to resolve these complaints or inquiries.

This program shall terminate upon completion of the collection of the specified sound level data for each phase and submission of an acceptable final report.

4.2.4.2 Point Pleasant Pumphouse

An ASLB ruling (LBP-83-11; March 8, 1983) requires that the licensee conduct a one-time field study after the transformers are placed in operation at Point Pleasant. The noise from operation of the transformers shall be reduced to a level so that the transformer core tones will be inaudible (i.e., not above the masking level, as defined below) at the site boundary.

The licensee shall determine, based on onsite measurements, the delta L(ex) (i.e., the noise level in excess of the masking level) for each tone. The masking level is defined as "N" dB above the ambient spectrum level, where "N" is defined as follows:

Masking Level "N", dB	Tone Frequency, Hz
17.5	120
17.4	240
17.8	360
18.2	480

The steps to be carried out are:

(1) Measures the broadband (nontonal) ambient nighttime (midnight to 4 a.m.) levels in all octave bands of frequency when the transformers are not energized (step A in the ASLB ruling). From these, tone-masking sound levels (thresholds of audibility) at each tone frequency shall be calculated.

(2) Measure the level of the tones that exist when the transformers are energized (step B) in the one-third-octave bands that contain them for comparison with the calculated masking levels from step A to determine audibility. Transformer tones should not be greater than the masking level for specific one-third-octave bands.

If, for any reason, it is not practicable to de-energize the transformers at any time during the prescribed measurement time period (midnight to 4 a.m.), alternative measurements shall be made. In that event, only one measurement of the entire spectrum need be made, but it must be done entirely in one-third-octave bands. Any measured octave band sound level that includes a tone or tones cannot be used to determine the true background ambient sound level for that octave band. In such cases, the background ambient level in any one-third-octave band containing a tone shall be approximated by interpolating between those adjacent one-third-octave band levels that do not contain any tones.

If audible tones, defined as any delta L(ex) value greater than 0, are found at the site boundary, mitigative measures, such as a three-sided barrier or a

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full enclosure around the transformers, shall be implemented (and their performance verified by noise measurement) so that tones are not greater than the masking level as previously determined.

4.2.4.3 Bradshaw Reservoir

The noise measurements proposed for the Point Pleasant site shall be made at the Bradshaw pumphouse site boundary while energized, on the line between the transformers and residences B, D, and F, to determine if the tones would be audible at those points (see Figure 5.6, LGS Final Environmental Statement, NUREG-0974, p. 5-140). Measures to render these tones inaudible to these points shall then be applied, as necessary, and their performance verified. The measurement program recommended for Bradshaw to test for audible tones from the transformers shall also be extended to include audible tones in the 1000-Hz octave band at the southeast site boundary in the direction of residence B.

4.2.4.4 Limerick Site

The operational measurement program to be applied to the Point Pleasant area shall be applied to the area immediately beyond the northern boundary of the Limerick site as well. If audible tones are found to be present at the northern site boundary after Unit 1 transformers are energized, mitigative measures shall be taken and their performance verified, as required for the Bradshaw Reservoir, to cause those tones to be inaudible.

For the LGS site only, data shall be collected from each sampling site during the time of year when foliage of deciduous trees is present and also during the time of year when such foliage is largely absent. Data collected from each sampling location shall encompass both the daytime and nighttime periods.

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5.0 ADMINISTRATIVE PROCEDURES

5.1 Review and Audit

The licensee shall provide for review and audit of compliance with the EPP. The audits shall be conducted independently of the individual or groups responsible for performing the specific activity. A description of the organizational structure utilized to achieve the independent review and audit function and results of the audit activities shall be maintained and made available for inspection.

5.2 Records Retention

Records associated with this Environmental Protection Plan ~~and logs relative to the environmental aspects of station operation~~ shall be made and retained in a manner convenient for review and inspection. These records ~~and logs~~ shall be made available to NRC on request.

Records of modifications to station structures, systems and components determined to potentially affect the continued protection of the environment shall be retained until the date of termination of the operating license ~~for the life of the station~~. All other records, ~~data and logs~~ relating to this EPP shall be retained for five years or, where applicable, in accordance with the requirements of other agencies.

5.3 Changes in Environmental Protection Plan

Request for changes in the EPP shall include an assessment of the environmental impact of the proposed change and a supporting justification. Implementation of such changes in the EPP shall not commence prior to NRC approval of the proposed changes in the form of a license amendment incorporating the appropriate revision to the EPP.

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5.4 Plant Reporting Requirements

(Deleted)

5.4.1 Routine Reports

An Annual Environmental Operating Report describing implementation of this EPP for the previous year shall be submitted to the NRC prior to May 1 of each year. The initial report shall be submitted prior to May 1 of the year following issuance of the operating license.

The report shall include summaries and analyses of the results of the environmental protection activities as required by Subsection 4.2 of this EPP for the report period, including a comparison with related preoperational studies, operational controls (as appropriate), and previous non-radiological environmental monitoring reports, and an assessment of the observed impacts of the plant operation on the environment. If harmful effects or evidence of trends towards irreversible damage to the environment are observed, the licensee shall provide a detailed analysis of the data and a proposed course of mitigating action.

The Annual Environmental Operating Report shall also include:

(1) A list of EPP noncompliances and the corrective actions taken to remedy them.

(2) A list of all changes in station design or operation, tests, and experiments made in accordance with Subsection 3.1 which involved a potentially significant unreviewed environmental question.

(3) A list of nonroutine reports submitted in accordance with Subsection 5.4.2.

In the event that some results are not available by the report due date, the report shall be submitted noting and explaining the missing results. The missing results shall be submitted as soon as possible in a supplementary report.

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5.4.2 Nonroutine Reports (an Unusual or Important Environmental)

A written report shall be submitted to the NRC within 30 days of occurrence of ~~a nonroutine~~ event. The report shall (a) describe, analyze, and evaluate the event, including extent and magnitude of the impact and plant operating characteristics, (b) describe the probable cause of the event, (c) indicate the action taken to correct the reported event, (d) indicate the corrective action taken to preclude repetition of the event and to prevent similar occurrences involving similar components or systems, and (e) indicate the agencies notified and their preliminary responses.

Events reportable under this subsection which also require reports to other Federal, State or local agencies shall be reported in accordance with those reporting requirements in lieu of the requirements of this subsection. The NRC shall be provided a copy of such report at the same time it is submitted to the other agency.

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ATTACHMENT 2-F

Markup of Proposed Appendix B Page Changes

OYSTER CREEK NUCLEAR GENERATING STATION

REVISED APPENDIX B PAGES

1-1
1-3
2-1
3-1 to 3-5

1.0 Environmental Monitoring

1.1 Non-Radiological Monitoring

1.1.1 Biotic - Aquatic

A. Fish Kill Monitoring Program

Objective

The objective of this program is to determine the species composition, abundance and distribution of station-induced fish kills due to winter shutdowns.

Specifications

After each Station shutdown, when the intake water temperature is below 8.5 degrees C (47.3 degrees F), visual inspections for fish shall be made along the shores of the discharge canal and the lower reaches of Oyster Creek within 24 hours of the initiation of the shutdown in accordance with the procedures prepared by the licensee per Section 3.4. A continuous temperature record shall be maintained through the 24-hour period after reaching cold shutdown.

Reporting Requirements

For planned shutdowns with the temperature of the intake water below 8.5 degrees C (47.3 degrees F), the NRC Region I office will be notified at least 24 hours in advance of such shutdown. This notification shall not be given for unplanned, automatic, or manual station trips.

If the shutdown results in greater than 100 fish killed and/or stressed, this event shall be reported to the NRC in accordance with Section 3.5.2.

~~The results of this program shall be included with the Annual Environmental Operating Report submitted in accordance with section 3.5.1.~~

~~Station shutdowns during winter months are, on occasion, unavoidable. Due to the physical configuration of the station and the discharge canal, some mortality to organisms may be experienced during winter shutdowns.~~

~~Mortality information associated with a winter shutdown will provide the empirical bases on which to judge the impact of these fishkills on Barnegat Bay, Oyster Creek, and Forked River.~~

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2.0 Special Monitoring And Study Activities

2.1 Unusual or Important Environmental Events

Environmental Monitoring Requirement

Unusual or important events are those that cause potentially significant environmental impact or that could be of public interest concerning environmental impact from station operation. The following are examples: on-site plant or animal disease outbreaks; unusual mortality of any species protected by the Endangered Species Act of 1973; fish kills in the vicinity of the site; unusually high impingement mortality episodes.

Action

Should an unusual or important event occur, the licensee shall make a non-routine prompt report to the NRC in accordance with the provisions of Subsection 3.5.2.

If an event is reportable under 10 CFR 50.72, then a duplicate immediate report is not required. However, a follow-up written report is required in accordance with Subsection 3.5.2.

3.0 ADMINISTRATIVE CONTROL

This section describes administrative and management controls established by the Applicant to provide continuing protection to the environment and to implement the environmental technical specifications.

3.1 Responsibility

Corporate responsibility for implementation of the Oyster Creek Enviromental Technical Specifications and for assuring that plant operations are controlled in such a manner as to provide continuing protection of the environment has been assigned by the Chief Nuclear Officer to the Vice President - Oyster Creek.

The responsibility for conducting the studies as set forth in Section 1.1 (Non-Radiological Monitoring) and all of Section 2.0 (Special Monitoring and Study Activities) rests with the management position responsible for environmental affairs, who reports to the Vice President - Oyster Creek.

Administrative measures are defined in Section 3.3 which provide that the individual or group responsible for auditing or otherwise verifying that an activity has been correctly performed is independent of the individual or group responsible for performing the activity.

3.2 Organization

Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to and including operating organization positions. Organizational charts ~~will~~ be documented in the Updated FSAR and updated in accordance with 10 CFR 50.71e.

will

3.3 Review and Audit

Independent audit and review functions for environmental matters are the responsibility of the management position responsible for environmental affairs. This department is independent of line responsibility for the operation of the plant. The independent reviews and audits of the OCETS will be carried out by personnel from environmental affairs or by other AmerGen personnel, outside contractors or consultants at the request of the environmental affairs Personnel.

When individuals in the environmental affairs department of AmerGen perform any function relating to the OCETS other than independent audit and review, the Vice President - Oyster Creek will ensure that an independent review and audit of that work is performed by another individual in the environmental affairs department or some other who is not directly responsible for the specific activity being reviewed and audited.

by the Quality Assurance Topical Report (QATR)

The audits and reviews will be performed as required ~~or requested but in no case less than yearly. The results of all reviews and audits will be documented in report directly to the Vice President—Oyster Creek.~~

Independent audits and reviews will encompass:

A. Coordination of the OCETS with the safety technical specifications to avoid conflicts and maintain consistency.

B. Compliance of station activities and operations with the OCETS.

C. Adequacy of the programs and station procedures which are involved in ensuring the plant is operated in accordance with the OCETS.

D. The proper functioning in accordance with the responsibilities listed in Section 3.1 of the OCETS.

E. Proposed changes to the OCETS and the evaluation of the impacts resulting from the changes.

F. Proposed written procedures, as described in Section 3.4.1 and proposed changes thereto which affect the environmental impact of the plant.

G. Proposed changes or modifications to plant systems or equipment and a determination of the environmental impact resulting from the changes.

H. Adequacy of investigations of violations of the OCETS and adequacy of and implementation of the recommendations to prevent recurrence of the violations.

3.4 Procedures

3.4.1 Detailed written procedures, including applicable check lists and instructions, will be prepared and adhered to for all activities involved in carrying out OCETS.

3.5 Plant Reporting Requirements

DELETED

3.5.1 ~~Routine Reports~~

~~A. Annual Environmental Operating Report~~

~~A report on the non-radiological environmental surveillance programs for the previous 12 months of operation shall be submitted to the NRC Document Control Desk as a separate document within 90 days after January 1 of each year (except as otherwise specified in the OCETS). In the event that some results are not available within the 90-day period, the report will be submitted noting and explaining the reasons for the missing data. The missing data shall be submitted as soon as possible in a supplementary report.~~

~~The report shall include summaries, analyses, interpretations and statistical evaluation of the results of the environmental monitoring required by the non-radiological environmental monitoring activities (Section 1), and the special monitoring study activities (Section 2) for the report period, including a comparison with preoperational studies, operational controls (as appropriate) and previous environmental monitoring reports, and an assessment of the station operation on the environment. If harmful effects or evidence of irreversible damage are suggested by the monitoring or special programs, the licensee shall provide a more detailed analysis of the data and a proposed course of action to alleviate the problem.~~

~~The Annual Report shall also include a summary of:~~

~~1) All Non-Routine Environmental Operating Reports and the corrective action taken to remedy them.~~

~~2) Changes made to state and federal permits and certificates which pertain to the requirements of OCETS.~~

~~3) Changes in station design which could involve an environmental impact.~~

~~4) Changes in ETS.~~

3.5.2 Non-Routine Environmental Operating Reports

A prompt report shall be submitted in the event that an Unusual or Important Environmental Event occurs (as specified in Section 2.1). Such an occurrence will be reported within 24 hours ~~by telephone, telegraph, or facsimile transmission~~ to the NRC ~~Document Control Desk~~ and within 30 days by a written report in accordance with 10 CFR 50.4. The written report and, to the extent possible, the preliminary ~~telephone, telegraph, or facsimile~~ report shall (a) describe, analyze, and evaluate the occurrence, including the extent and magnitude of the impact, (b) describe the cause of the occurrence, and (c) indicate the corrective action, if necessary, taken (including any significant changes made in the procedures) to preclude repetition of the occurrence should the occurrence be station related.

3.5.3 Change in Environmental Technical Specifications

A. A report shall be made to the NRC prior to implementation of a change in plant design, in plant operation, or in procedures described in Section 3.4, only if the change would have a significant adverse effect on the environment or involves an environmental matter or question not previously reviewed and evaluated by the NRC. The report shall include a description and evaluation of the changes and a supporting ~~benefit-cost analysis~~ justification

B. Request for changes in environmental technical specifications shall be submitted ~~to the Director of Nuclear Reactor Regulation for review and authorization. The Request shall include an evaluation of the environmental impact of the proposed change and a supporting benefit-cost analysis.~~ In accordance with 10 CFR 50.90,

C. Changes or additions to required Federal, and State permits and certificates for the protection of the environment that pertain to the requirements of OCETS shall be reported to the NRC within 30 days. In the event that the licensee initiates or becomes aware of a request for changes to any of the water quality requirements, limits or values stipulated in any certification or permit issued pursuant to Section 401 or 402 of the Federal Water Pollution Control Act (PL 92-500) which is also the subject of an OCETS reporting requirement, NRC shall be notified ~~concurrently with the~~ following approval by the authorizing agency. The notification to the NRC shall include an evaluation of the environmental impact of the revised requirement, limit or value being sought.

of approval by the appropriate permitting authority

If an event is reportable under 10 CFR 50.72, then a duplicate Immediate report is not required. However, a follow-up written report is required

~~If, during NRC's review of the proposed change, it is determined that a potentially severe environmental impact could result from the change, the NRC will consult with the authorizing agency to determine the appropriate action to be taken.~~

3.6 Records Retention

3.6.1 Eighty (80%) percent data recovery annually for each environmental monitoring requirement is considered satisfactory for the purposes of the OCETS. The variability and uncertainty of environmental conditions demand allowance for some missed data in order to preclude an excessive reporting burden. This provision for missed data does not permit deliberate omission of sample collection or analyses but rather is meant to cover data missed due to circumstances beyond the control of the licensee, its representative or subcontractor. Records of the reasons for all missed data shall be retained with the data reports.

3.6.2 Records ~~and logs~~ relative to the following areas will be retained ~~for the life of the plant.~~ until the date of termination of the Operating License.

A. Records and drawings detailing plant design changes made to systems and equipment as described in Section 3.5.3.

B. Records of all environmental surveillance data.

3.6.3 All other records ~~and logs~~ relating to the environmental technical specifications will be retained for five years following ~~logging or~~ recording.

ATTACHMENT 2-G

Markup of Proposed Appendix B Page Changes

PEACH BOTTOM ATOMIC POWER STATION UNIT 2

REVISED APPENDIX B PAGES

App B-2 to App B-6

PEACH BOTTOM ATOMIC POWER STATION UNIT 3

REVISED APPENDIX B PAGES

App B-2 to App B-6

Appendix B Environmental Technical Specifications

1.2 Reviews and Audits

1.2.1 Plant Reviews and Audits

Reviews and audits of plant operation are described in the ~~Quality Assurance Program~~ Quality Assurance Topical Report (QATR)

Appendix B Environmental Technical Specifications

1.3 Environmental Deviations

1.3.1 Environmental Deviations shall be reported immediately to the Plant Manager ~~or, in his absence, the Vice President - Peach Bottom Atomic Power Station~~. designee

Environmental Deviations include exceeding a protection limit or report level or, in the opinion of the Plant Manager, an event involving significant environmental impact. A protection limit is a numerical limit on plant effluent or operating parameter which, when not exceeded, should not result in an unacceptable environmental impact. A report level is the numerical value of an environmental parameter below which the environmental impact is considered reasonable on the basis of available information.

1.3.2 ~~The Plant Operations Review Committee shall promptly review Environmental Deviations and prepare a report that includes:~~ Deleted

~~a. An evaluation of the cause of the deviation;~~

~~b. The extent and magnitude of the impact; and~~

~~c. Recommendations for appropriate action to prevent or reduce the probability of such a deviation.~~

~~The Vice President - Peach Bottom Atomic Power Station and the Chairman of the Nuclear Review Board shall review Environmental Deviation Reports and approve any recommended actions.~~

1.3.3 Environmental Deviations shall be reported to the NRC ~~by the Vice President - PBAPS~~ as specified in Section 1.4.2.1.

1.3.4 If environmental monitoring programs detect harmful effects or evidence of irreversible damage not considered in the Final Environmental Statement, an analysis of the problem and a plan of action to eliminate or significantly reduce the detrimental effects of the damage shall be prepared and provided to the NRC.

Appendix B Environmental Technical Specifications

1.4 Reporting Requirements

1.4.1 ~~Routine Reports~~

Deleted

~~In addition to the environmental monitoring information required by Sections 5.6.2 and 5.6.3 of Appendix A to the Operating License, the following information shall be submitted in an annual report:~~

~~a. Records of data and analysis of special study programs designed to evaluate the impact of plant operation on an environmental parameter;~~

~~b. Records of changes to the plant which affect the environmental impact of the facility; and~~

~~c. Records of changes to environmental permits and certificates.~~

1.4.2 Non-Routine Reports

1.4.2.1 Environmental Deviation Reports

In the event of an Environmental Deviation as defined in Section 1.3.1, notification shall be made within 24 hours ~~by telephone or telegraph~~ to the ~~Director of the~~ NRC ~~Regional Inspection and Enforcement Office~~. A written report shall follow within ~~10 working~~ 30 days to the NRC in accordance with 10 CFR 50.4.

The written report on an Environmental Deviation, and to the extent possible, the preliminary ~~telephone and telegraph~~ notification, should:

a. Describe, analyze, and evaluate implications of the Environmental Deviation;

b. Identify the cause of the occurrence; and

c. Indicate the corrective action (including any significant change made in procedures) taken to prevent similar occurrences involving similar components or systems.

(continued)

If an event is reportable under 10CFR 50.72, then a duplicate immediate report under this subsection is not required. However, a follow-up written report is required.

Appendix B Environmental Technical Specifications

1.4 Reporting Requirements (continued)

1.4.2.2 Reporting Changes to the Plant or Permits

A written report, including an evaluation of the environmental impact resulting from a change, shall be forwarded to the NRC in accordance with 10 CFR 50.4 in the event of:

a. Changes to the plant that affect the environmental impact evaluation contained in the Environmental Report or the Environmental Statement.

b. Changes or additions to permits and certificates required by Federal, State, local and regional authorities for the protection of the environment. When submittals of changes are ~~made to~~ approved by the concerned agency, a copy shall be submitted to the NRC.

c. Requests for changes in Environmental Technical Specifications.

Appendix B Environmental Technical Specifications

1.5 Record Retention

1.5.1 Records Retained for 5 Years

Records ~~and/or logs~~ relative to the following items shall be kept in a manner convenient for review and shall be retained for 5 years, unless a longer period is required by applicable regulations.

a. Records of principal maintenance activities of equipment pertaining to environmental impact.

b. Records of Environmental Deviations.

c. Records of periodic checks, inspections and/or calibrations performed to verify that environmental surveillance requirements are being met.

d. ~~Records of special study programs as described in Section 1.4.1.~~ Deleted

e. Records of changes made to operating procedures, equipment, permits or certificates.

1.5.2 Records Retained ~~for the Life of the Plant~~ Until the date of termination of the operating license.

Records of off-site environmental radiation surveys shall be retained ~~for the life of the plant~~.

Appendix B Environmental Technical Specifications

1.2 Reviews and Audits

1.2.1 Plant Reviews and Audits

Reviews and audits of plant operation are described in the Quality Assurance ~~Program~~ Topical Report (QATR).

Appendix B Environmental Technical Specifications

1.3 Environmental Deviations

1.3.1 Environmental Deviations shall be reported immediately to the Plant Manager ~~or, in his absence, the Vice President - Peach Bottom Atomic Power Station~~ designee

Environmental Deviations include exceeding a protection limit or report level or, in the opinion of the Plant Manager, an event involving significant environmental impact. A protection limit is a numerical limit on plant effluent or operating parameter which, when not exceeded, should not result in an unacceptable environmental impact. A report level is the numerical value of an environmental parameter below which the environmental impact is considered reasonable on the basis of available information.

1.3.2 Deleted

~~The Plant Operations Review Committee shall promptly review Environmental Deviations and prepare a report that includes:~~

~~a. An evaluation of the cause of the deviation;~~

~~b. The extent and magnitude of the impact; and~~

~~c. Recommendations for appropriate action to prevent or reduce the probability of such a deviation.~~

~~The Vice President - Peach Bottom Atomic Power Station and the Chairman of the Nuclear Review Board shall review Environmental Deviation Reports and approve any recommended actions.~~

1.3.3 Environmental Deviations shall be reported to the NRC ~~by the Vice President - PBAPS~~ as specified in Section 1.4.2.1.

1.3.4 If environmental monitoring programs detect harmful effects or evidence of irreversible damage not considered in the Final Environmental Statement, an analysis of the problem and a plan of action to eliminate or significantly reduce the detrimental effects of the damage shall be prepared and provided to the NRC.

Appendix B Environmental Technical Specifications

1.4 Reporting Requirements

1.4.1 ~~Routine Reports~~

~~In addition to the environmental monitoring information required by Sections 5.6.2 and 5.6.3 of Appendix A to the Operating License, the following information shall be submitted in an annual report:~~

Deleted

~~a. Records of data and analysis of special study programs designed to evaluate the impact of plant operation on an environmental parameter;~~

~~b. Records of changes to the plant which affect the environmental impact of the facility; and~~

~~c. Records of changes to environmental permits and certificates.~~

1.4.2 Non-Routine Reports

1.4.2.1 Environmental Deviation Reports

In the event of an Environmental Deviation as defined in Section 1.3.1, notification shall be made within 24 hours ~~by telephone or telegraph~~ to the ~~Director of the~~ NRC ~~Regional Inspection and Enforcement Office~~. A written report shall follow within ~~10 working~~ 30 days to the NRC in accordance with 10 CFR 50.4.

The written report on an Environmental Deviation, and to the extent possible, the preliminary ~~telephone and telegraph~~ notification, should:

a. Describe, analyze, and evaluate implications of the Environmental Deviation;

b. Identify the cause of the occurrence; and

c. Indicate the corrective action (including any significant change made in procedures) taken to prevent similar occurrences involving similar components or systems.

(continued)

If an event is reportable under 10 CFR 50.72, then a duplicate immediate report under this subsection is not required. However, a follow-up written report is required.

Appendix B Environmental Technical Specifications

1.4 Reporting Requirements (continued)

1.4.2.2 Reporting Changes to the Plant or Permits

A written report, including an evaluation of the environmental impact resulting from a change, shall be forwarded to the NRC in accordance with 10 CFR 50.4 in the event of:

a. Changes to the plant that affect the environmental impact evaluation contained in the Environmental Report or the Environmental Statement.

b. Changes or additions to permits and certificates required by Federal, State, local and regional authorities for the protection of the environment. When submittals of changes are ~~made to~~ approved by the concerned agency, a copy shall be submitted to the NRC.

c. Requests for changes in Environmental Technical Specifications.

Appendix B Environmental Technical Specifications

1.5 Record Retention

1.5.1 Records Retained for 5 Years

Records ~~and/or logs~~ relative to the following items shall be kept in a manner convenient for review and shall be retained for 5 years, unless a longer period is required by applicable regulations.

a. Records of principal maintenance activities of equipment pertaining to environmental impact.

b. Records of Environmental Deviations.

c. Records of periodic checks, inspections and/or calibrations performed to verify that environmental surveillance requirements are being met.

d. ~~Records of special study programs as described in Section 1.4.1.~~ Deleted

e. Records of changes made to operating procedures, equipment, permits or certificates.

1.5.2 Records Retained ~~for the Life of the Plant~~ Until the date of termination of the operating license

Records of off-site environmental radiation surveys shall be retained ~~for the life of the plant.~~

ATTACHMENT 2-H

Markup of Proposed Appendix B Page Changes

QUAD CITIES NUCLEAR POWER STATION UNIT 1

REVISED APPENDIX B PAGES

1-1
2-2 to 2-3
3-1

QUAD CITIES NUCLEAR POWER STATION UNIT 2

REVISED APPENDIX B PAGES

1-1
2-2 to 2-3
3-1

1.0 Objectives of the Environmental Protection Plan

The Environmental Protection Plan (EPP) is to provide for protection of environmental values during ~~construction and~~ operation of the nuclear facility. The principal objectives of the EPP are as follows:

(1) Verify that the plant is operated in an environmentally acceptable manner, as established by the FES and other NRC environmental impact assessments.

(2) Coordinate NRC requirements and maintain consistency with other Federal, State and local requirements for environmental protection.

(3) Keep NRC informed of the environmental effects of facility ~~construction and~~ operation and of actions taken to control those effects.

Environmental concerns identified in the FES which relate to water quality matters are regulated by way of the licensee's National Pollutant Discharge Elimination System (NPDES) permit, issued by the Illinois Environmental Protection Agency.

documents specified in (1) of this Subsection, which may have significant adverse environmental impact.

The licensee shall maintain records of changes in facility design or operation and of tests and experiments carried out pursuant to this Subsection. These records shall include a written evaluation which provide bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question.

2.2 Reporting Related to the NPDES Permits and State Certifications

Violations of the NPDES Permit or the State certification (pursuant to Section 401 of the Clean Water Act) shall be reported to the NRC by submittal of copies of the reports required by the NPDES Permit or certification. The licensee shall also provide the NRC with copies of the results of environmental studies at the same time they are submitted to the permitting agency. ~~Changes and additions to the NPDES Permit or the State certification shall be reported to the NRC within 30 days following the date the change is approved. If a permit or certification, in part or in its entirety, is appealed and stayed, the NRC shall be notified within 30 days following the date the stay is granted.~~

~~The NRC shall be notified of changes to the effective NPDES Permit proposed by the licensee by providing NRC with a copy of the proposed change at the same time it is submitted to the permitting agency. The licensee shall provide the NRC a copy of the application for renewal of the NPDES Permit at the same time the application is submitted to the permitting agency.~~

The NRC shall be provided with a copy of the current NPDES permit or State certification within 30 days of approval. Changes to the NPDES permit or State certification shall be reported to the NRC within 30 days of the date 2-2 the change is approved.

2.3 Changes Required for Compliance with Other Environmental Regulations

Changes in plant design or operation and performance of tests or experiments that are either regulated or mandated by ~~which are required to achieve compliance with~~ other Federal, State, or local environmental regulations are not subject to the requirements of Section 2.1. However, if any environmental impacts of a change are not evaluated under other Federal, State, or local environmental regulations, then those impacts are subject to the requirements of Section 2.1.

If an event is reportable under 10CFR50.72, then a duplicate immediate report under this subsection is not required. However, the follow-up written report is still required.

3.0 Environmental Conditions

3.1 Unusual or Important Environmental Events

INSERT

Any occurrence of an unusual or important event that indicates or could result in significant environmental impact causally related to station operation shall be recorded and promptly reported to the NRC within 24 hours followed by a written report within 30 days. No routine monitoring programs are required to implement this condition.

The written report shall (a) describe, analyze, and evaluate the event, including extent and magnitude of the impact and plant operating characteristics, (b) describe the probable cause of the event, (c) indicate the action taken to correct the reported event, (d) indicate the corrective action taken to preclude repetition of the event and to prevent similar occurrences involving similar components or systems, and (e) indicate the agencies notified and their preliminary responses.

Events reportable under this subsection which also require reports to other Federal, State or local agencies shall be reported in accordance with those reporting requirements in lieu of the requirements of this subsection. The NRC shall be provided a copy of such report at the same time it is submitted to the other agency.

The following are examples of unusual or important events: excessive bird impaction events; onsite plant or animal disease outbreaks; mortality or unusual occurrence of any species protected by the Endangered Species Act of 1973; unusual fish kills; increase in nuisance organisms or conditions; and unanticipated or emergency discharge of waste water or chemical substances.

1.0 Objectives of the Environmental Protection Plan

he Environmental Protection Plan (EPP) is to provide for protection of environmental values during ~~construction and~~ operation of the nuclear facility. The principal objectives of the EPP are as follows:

(1) Verify that the plant is operated in an environmentally acceptable manner, as established by the FES and other NRC environmental impact assessments.

(2) Coordinate NRC requirements and maintain consistency with other Federal, State and local requirements for environmental protection.

(3) Keep NRC informed of the environmental effects of facility ~~construction and~~ operation and of actions taken to control those effects.

Environmental concerns identified in the FES which relate to water quality matters are regulated by way of the licensee's National Pollutant Discharge Elimination System (NPDES) permit, issued by the Illinois Environmental Protection Agency.

The licensee shall maintain records of changes in facility design or operation and of tests and experiments carried ~~our~~ out pursuant to this Subsection. These records shall include a written evaluation which provide bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question.

2.2 Reporting Related to the NPDES Permits and State Certifications

Violations of the NPDES Permit or the State certification (pursuant to Section 401 of the Clean Water Act) shall be reported to the NRC by submittal of copies of the reports required by the NPDES Permit or certification. The licensee shall also provide the NRC with copies of the results of environmental studies at the same time they are submitted to the permitting agency.

~~Changes and additions to the NPDES Permit or the State certification shall be reported to the NRC within 30 days following the date the change is approved. If a permit or certification, in part or in its entirety, is appealed and stayed, the NRC shall be notified within 30 days following the date the stay is granted.~~

INSERT

~~The NRC shall be notified of changes to the effective NPDES Permit proposed by the licensee by providing NRC with a copy of the proposed change at the same time it is submitted to the permitting agency. The licensee shall provide the NRC a copy of the application for renewal of the NPDES Permit at the same time the application is submitted to the permitting agency.~~

The NRC shall be provided with a copy of the current NPDES permit or State certification within 30 days of approval. Changes to the NPDES permit or State certification shall be reported to the NRC within 30 days of the date the change is approved.

2.3 Changes Required for Compliance with Other Environmental Regulations

Changes in plant design or operation and performance of tests or experiments ~~which are required to achieve compliance with~~ that are either regulated or mandated by other Federal, State, or local environmental regulations are not subject to the requirements of Section 2.1. However, if any environmental impacts of a change are not evaluated under other Federal, State, or local environmental regulations, then those impacts are subject to the requirements of Section 2.1.

If an event is reportable under 10 CFR 50.72, then a duplicate immediate report under this subsection is not required. However, the follow up written report is still required.

3.0 Environmental Conditions

3.1 Unusual or Important Environmental Events

Any occurrence of an unusual or important event that indicates or could result in significant environmental impact causally related to station operation shall be recorded and promptly reported to the NRC within 24 hours followed by a written report within 30 days. No routine monitoring programs are required to implement this conditions.

INSERT

The written report shall (a) describe, analyze, and evaluate the event, including extent and magnitude of the impact and plant operating characteristics, (b) describe the probable cause of the event, (c) indicate the action taken to correct the reported event, (d) indicate the corrective action taken to preclude repetition of the event and to prevent similar occurrences involving similar components or systems, and (e) indicate the agencies notified and their preliminary responses.

Events reportable under this subsection which also require reports to other Federal, State or local agencies shall be reported in accordance with those reporting requirements in lieu of the requirements of this subsection. The NRC shall be provided a copy of such report at the same time it is submitted to the other agency.

The following are examples of unusual or important events: excessive bird impaction events; onsite plant or animal disease outbreaks; mortality or unusual occurrence of any species protected by the Endangered Species Act of 1973; unusual fish kills; increase in nuisance organisms or conditions; and unanticipated or emergency discharge of waste water or chemical substances.

ATTACHMENT 3-A

Typed Pages for

Appendix B Changes

BRAIDWOOD STATION

REVISED APPENDIX B PAGES

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TO FACILITY OPERATING LICENSE NOS. NPF-72 & NPF-77

EXELON GENERATION COMPANY, LLC

BRAIDWOOD STATION UNITS 1 & 2

DOCKET NOS. 50-456 AND 50-457

ENVIRONMENTAL PROTECTION PLAN

(NON-RADIOLOGICAL)

Amendment Nos.

BRAIDWOOD STATION

UNITS 1 and 2

ENVIRONMENTAL PROTECTION PLAN

(NON-RADIOLOGICAL)

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2.0 Environmental Protection Issues

In the FES-OL dated June, 1984, the staff considered the environmental impacts associated with the operation of the two unit Braiwood Station. No environmental issues were identified which required study or license conditions to resolve environmental concerns and to assure adequate protection of the environment.

2.1 Aquatic Issues

No specific aquatic issues were raised by the staff in the FES-OL.

Aquatic matters are addressed by the effluent limitations, monitoring requirements and the Section 316(b) demonstration requirement contained in the effective NPDES permit issued by the Federal or State permitting authority. The NRC will rely on these agencies for regulation of matters involving water quality and aquatic biota.

2.2 Terrestrial Issues

No specific terrestrial issues were raised by the staff in the FES-OL.

A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns: (1) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the FES-OL, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or (2) a significant change in effluents or power level or (3) a matter, not previously reviewed and evaluated in the documents specified in (1) of this Subsection, which may have a significant adverse environmental impact.

The licensee shall maintain records of changes in facility design or operation and of tests and experiments carried out pursuant to this Subsection. These records shall include written evaluations which provide bases for the determination that the change, test or experiment does not involve an unreviewed environmental question or constitute a decrease in the effectiveness of this EPP to meet the objectives specified in Section 1.0.

3.2 Reporting Related to the NPDES Permit and State Certification

The NRC shall be provided with a copy of the current NPDES permit or State Certification within 30 days of approval. Changes to the NPDES permit or State Certification shall be reported to the NRC within 30 days of the date the change is approved.

3.3 Changes Required for Compliance with Other Environmental Regulations

Changes in plant design or operation and performance of tests or experiments which are either regulated or mandated by other Federal, State, and local environmental regulations are not subject to the requirements of Section 3.1. However, if any environmental impacts of a change are not evaluated under other Federal, State or local environmental regulations, then those impacts are subject to the requirements of Section 3.1.

4.0 Environmental Conditions

4.1 Unusual or Important Environmental Events

Any occurrence of an unusual or important event that indicates or could result in significant environmental impact causally related to plant operation shall be recorded and reported to the NRC within 24 hours followed by a written report in accordance with Subsection 5.4.2. If an event is reportable under 10 CFR 50.72, then a duplicate immediate report under this subsection is not required. However, a follow-up written report is required in accordance with Subsection 5.4.2. The following are examples: excessive bird impaction events, onsite plant or animal disease outbreaks, mortality or unusual occurrence of any species protected by the Endangered Species Act of 1973, fish kills, increase in nuisance organisms or conditions, and unanticipated or emergency discharge of waste water or chemical substances.

No routine monitoring programs are required to implement this condition.

5.0 Administrative Procedures

5.1 Review and Audit

The licensee shall provide for review and audit of compliance with the EPP. The audits shall be conducted independently of the individual or groups responsible for performing the specific activity. A description of the organization structure utilized to achieve the independent review and audit function and results of the audit activities shall be maintained and made available for inspection.

5.2 Records Retention

Records associated with this EPP shall be made and retained in a manner convenient for review and inspection. These records shall be made available to NRC on requestt.

Records of modifications to station structures, systems and components determined to potentially affect the continued protection of the environment shall be retained until the date of termination of the operating license. All other records relating to this EPP shall be retained for five years or, where applicable, in accordance with the requirements of other agencies.

5.3 Changes in Environmental Protection Plan

Requests for changes in the EPP shall include an assessment of the environmental impact of the proposed change and a supporting justification. Implementation of such changes in the EPP shall not commence prior to NRC approval of the proposed changes in the form of a license amendment incorporatinq the appropriate revision to the EPP.

5.4 Plant Reporting Requirements

5.4.1 Deleted

5.4.2 Nonroutine Reports

A written report shall be submitted to the NRC within 30 days of an occurrence of an unusual or important environmental event. The report shall (a) describe, analyze, and evaluate the event, including extent and magnitude of the impact, and plant operating characteristics, (b) describe the probable cause of the event, (c) indicate the action taken to correct the reported event, (d) indicate the corrective action taken to preclude repetition of the event and to prevent similar occurrences involving similar components or systems, and (e) indicate the agencies notified and their preliminary responses.

Events reportable under this subsection which also require reports to other Federal, State or local agencies shall be reported in accordance with those reporting requirements in lieu of the requirements of this subsection. The NRC shall be provided a copy of such report at the same time it is submitted to the other agency.

ATTACHMENT 3-B

Typed Pages for

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BYRON STATION

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TO FACILITY OPERATING LICENSE NOS. NPF-37 & NPF-66

EXELON GENERATION COMPANY, LLC

BYRON STATION UNITS 1 & 2

DOCKET NOS. 50-454 AND 50-455

ENVIRONMENTAL PROTECTION PLAN

(NON-RADIOLOGICAL)

Amendment Nos.

BYRON STATION

UNITS 1 and 2

ENVIRONMENTAL PROTECTION PLAN

(NON-RADIOLOGICAL)

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Amendment Nos.

2.0 Environmental Protection Issues

In the FES-OL dated April 1982, the staff considered the environmental impacts associated with the operation of the two unit Byron Station. Certain environmental issues were identified which required study or license conditions to resolve environmental concerns and to assure adequate protection of the environment.

2.1 Aquatic Issues

No specific aquatic issues were raised by the staff in the FES-OL.

Aquatic matters are addressed by the effluent limitations, monitoring requirements and the Section 316(b) demonstration requirement contained in the effective NPDES permit issued by the Federal or State permitting authority. The NRC will rely on these agencies for regulation of matters involving water quality and aquatic biota.

2.2 Terrestrial Issues

The terrestrial issues raised by the staff in the FES-OL were:

(1) Potential impacts of cooling tower emissions on the terrestrial environment (FES-OL Section 5.5.1.1).

(2) Potential increased noise level impacts in the vicinity of the station (FES-OL Section 5.12).

NRC requirements with regard to the terrestrial issues are specified in Subsection 4.2 of this EPP.

A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns: (1) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the FES-OL, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or (2) a significant change in effluents or power level or (3) a matter, not previously reviewed and evaluated in the documents specified in (1) of this Subsection, which may have a significant adverse environmental impact.

The licensee shall maintain records of changes in facility design or operation and of tests and experiments carried out pursuant to this Subsection. These records shall include written evaluations which provide bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question or constitute a decrease in the effectiveness of this EPP to meet the objectives specified in Section 1.0.

3.2 Reporting Related to the NPDES Permit and State Certification

The NRC shall be provided with a copy of the current NPDES permit or State ertification within 30 days of approval. Changes to the NPDES permit or State certification shall be reported to the NRC within 30 days of the date the change is approved.

3.3 Changes Required for Compliance with Other Environmental Regulations

Changes in plant design or operation and performance of tests or experiments which are either regulated or mandated by other Federal, State, and local environmental regulations are not subject to the requirements of Section 3.1. However, if any environmental impacts of a change are not evaluated under other Federal, State or local environmental regulations, then those impacts are subject to the requirements of Section 3.1.

4.0 Environmental Conditions

4.1 Unusual or Important Environmental Events

Any occurrence of an unusual or important event that indicates or could result in significant environmental impact causally related to plant operation shall be recorded and reported to the NRC within 24 hours followed by a written report per Subsection 5.4.2. If an event is reportable under 10 CFR 50.72, then a duplicate immediate report under this subsection is not required. However, a follow-up written report is required in accordance with Subsection 5.4.2. The following are examples: excessive bird impaction events, onsite plant or animal disease outbreaks, mortality or unusual occurrence of any species protected by the Endangered Species Act of 1973, fish kills, increase in nuisance organisms or conditions, and unanticipated or emergency discharge of waste water or chemical substances.

No routine monitoring programs are required to implement this condition.

4.2 Environmental monitoring

The terrestrial monitoring programs identified in Subsections 2.2(1) and 2.2(2) have been completed and no further monitoring under these programs is required.

4.2.1 Deleted

4.2.2 Deleted

5.0 Administrative Procedures

5.1 Review and Audit

The licensee shall provide for review and audit of compliance with the EPP. The audits shall be conducted independently of the individual or groups responsible for performing the specific activity. A description of the organization structure utilized to achieve the independent review and audit function and results of the audit activities shall be maintained and made available for inspection.

5.2 Records Retention

Records associated with this EPP shall be made and retained in a manner convenient for review and inspection. These records shall be made available to NRC on request.

Records of modifications to station structures, systems and components determined to potentially affect the continued protection of the environment shall be retained until the date of termination of the operating license. All other records relating to this EPP shall be retained for five years or, where applicable, in accordance with the requirements of other agencies.

5.3 Changes in Environmental Protection Plan

Requests for changes in the EPP shall include an assessment of the environmental impact of the proposed change and a supporting justification. Implementation of such changes in the EPP shall not commence prior to NRC approval of the proposed changes in the form of a license amendment incorporating the appropriate revision to the EPP.

5.4 Plant Reporting Requirements

5.4.1 Deleted

5.4.2 Nonroutine Reports

A written report shall be submitted to the NRC within 30 days of occurrence of an unusual or important environmental event. The report shall (a) describe, analyze, and evaluate the event, including extent and magnitude of the impact, and plant operating characteristics, (b) describe the probable cause of the event, (c) indicate the action taken to correct the reported event, (d) indicate the corrective action taken to preclude repetition of the event and to prevent similar occurrences involving similar components or systems, and (e) indicate the agencies notified and their preliminary responses.

Events reportable under this subsection which also require reports to other Federal, State or local agencies shall be reported in accordance with those reporting requirements in lieu of the requirements of this subsection. The NRC shall be provided a copy of such report at the same time it is submitted to the other agency.

ATTACHMENT 3-C

Typed Pages for

Appendix B Changes

CLINTON POWER STATION

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CLINTON POWER STATION

UNIT NO. 1

ENVIRONMENTAL PROTECTION PLAN

(NON-RADIOLOGICAL)

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1.0 OBJECTIVES OF THE ENVIRONMENTAL PROTECTION PLAN

The Environmental Protection Plan (EPP) provides for protection of non-radiological environmental values during operation of the nuclear facility. The principal objectives of the EPP are as follows:

(a) Verify that the Plant is operated in an environmentally acceptable manner, as established by the Final Environmental Statement – Operating License Stage* (FES-OL) and other NRC environmental impact assessments.

(b) Coordinate NRC requirements and maintain consistency with other Federal, State, and local requirements for environmental protection.

(c) Keep NRC informed of the environmental effects of facility operation and of action taken to control those effects.

Environmental concerns identified in the FES-OL which relate to water quality matters are regulated by way of the licensee's NPDES permit.

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* Final Environmental Statement related to the operation of Clinton Power Station, Unit No. 1. NUREG-0854, May 1982 (FES-OL)

2.0 ENVIRONMENTAL PROTECTION ISSUES

In the FES-OL dated May 1982, the staff considered the environmental impacts associated with the operation of the Clinton Power Station. Certain environmental issues were identified which required study or license conditions to resolve environmental concerns and to assure adequate protection of the environment.

2.1 Aquatic Issues

(a) Effluent limitations and aquatic monitoring requirements are contained in the effective NPDES permit issued by the Federal or State permitting authority. The NRC will rely on these agencies for regulation of these matters involving water quality and aquatic biota.

(b) One specific aquatic issue raised by the staff concerned the potential for the establishment of encephalitic human pathogenic thermophilic amoeba in Clinton Lake after power generation begins. The NRC will rely on the licensee to conduct monitoring in accordance with the recommendations of the Illinois Department of Public Health as stated in the FES-OL.

2.2 Terrestrial Issues

Steam fog from the station's cooling lake has the potential of reducing visibility over nearby roads and bridges. A fog monitoring program shall be initiated to determine the frequency and density of cooling lake-induced fog which could potentially cause highway safety hazards adjacent to the cooling lake. The NRC shall rely on the licensee to conduct a fog monitoring program in cooperation with the Illinois Department of Transportation and local highway safety officials as stated in the FES-OL.

2.3 Atomic Safety Licensing Board Ordered Unit 2 Issues

In the event of harmful effects or evidence of trends toward irreversible damage to the environment due to the Unit 2 excavation, the NRC will be provided with a detailed analysis of data and proposed course of action to alleviate the problem.

3.0 CONSISTENCY REQUIREMENTS

3.1 Plant Design and Operation

The licensee may make changes in plant design or operation or perform tests or experiments affecting the environment provided such changes, tests or experiments do not involve an unreviewed environmental question, and do not involve a change in the EPP.* Changes in plant design or operation and performance of tests or experiments which do not affect the environment are not subject to the requirements of this EPP. Activities governed by Section 3.3 are not subject to the requirements of this section.

Before engaging in additional construction or operational activities which may affect the environment, the licensee shall prepare and record an environmental evaluation of such activity if the activity has measurable environmental effects which are not confined to onsite areas previously disturbed during site preparation and plant construction. When the evaluation indicates that such activity involves an unreviewed environmental question, the licensee shall provide a written evaluation of such activities and obtain prior approval from the Nuclear Regulatory Commission. When such activity involves a change in the EPP, such activity and change to the EPP may be implemented only in accordance with an appropriate license amendment as set forth in Section 5.3 of this EPP.

A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns (1) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the FES-OL as modified by staff's testimony to the Atomic Safety and Licensing Board, supplements to the FES-OL, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board, or (2) a significant change in effluents or power level, or (3) a matter not previously reviewed and evaluated in the documents specified in (1) of this Subsection, which may have a significant adverse environmental impact.

The licensee shall maintain records of changes in plant design or operation and of tests and experiments carried out pursuant to this Subsection. These records shall include written evaluations which provide bases for the determination that the change, test or experiment does not involve an unreviewed environmental question nor constitute a decrease in the effectiveness of this EPP to meet the objectives specified in Section 1.0.

* This provision does not relieve the licensee of the requirements of 10CFR50.59.

3.2 Reporting Related to the NPDES Permits and State Certification

The NRC shall be provided with a copy of the current NPDES permit or state certification within 30 days of approval. Changes to the NPDES permit or state certification shall be reported to the NRC within 30 days of the date the change is approved.

3.3 Changes Required for Compliance with Other Environmental Regulations

Changes in plant design or operation and performance of tests or experiments that are either regulated or mandated by other Federal, State, or local environmental regulations are not subject to requirements of Section 3.1. However, if an environmental impact of a change is not evaluated under other Federal, State, or local environmental regulations, then the impact is subject to the requirements of Section 3.1.

4.0 ENVIRONMENTAL CONDITIONS

4.1 Unusual or Important Environmental Events

Any occurrence of an unusual or important event that indicates or could result in significant environmental impact causally related to station operation shall be recorded and promptly reported to the NRC within 24 hours followed by a written report per Section 5.4. If an event is reportable under 10CFR50.72, then a duplicate immediate report under this section is not required. However, a follow-up written report is required in accordance with Section 5.4. The following are examples: excessive bird impaction events, onsite plant or animal disease outbreaks, mortality or unusual occurrence of any species protected by the Endangered Species Act of 1973, significant fish kills, increase in nuisance organisms or conditions and unanticipated or emergency discharge of waste water or chemical substances.

4.2 Environmental Monitoring

Environmental monitoring programs are conducted in accordance with the guidance and controls of agencies outside the Nuclear Regulatory Commission (NRC). The NRC has recognized the Federal or State permitting authority as the authorities having jurisdiction in Section 2.0 of this EPP. Therefore, no specific environmental monitoring is required by the NRC under this EPP.

5.0 ADMINISTRATIVE PROCEDURES

5.1 Review and Audit

The licensee shall provide for review and audit of compliance with the EPP. The audits shall be conducted independently of the individual or groups responsible for performing the specific activity. A description of the organization structure utilized to achieve the independent review and audit function and results of the audit activities shall be maintained and made available for inspection.

5.2 Records Retention

The documentation listed below shall be made and retained in a manner convenient for review and inspection by the NRC. This documentation shall be retained as indicated below and made available to the NRC upon request.

(a) Records of modifications to plant structures, systems, and components determined to potentially affect the continued protection of the environment (until the date of termination of the operating license).

(b) Records and procedures relating to the EPP (5 years).

(c) All other records and procedures relating to the EPP (5 years, or where applicable, in accordance with the requirements of other agencies).

5.3 Changes in Environmental Protection Plan

Requests for changes in the EPP shall include an assessment of the environmental impact of the proposed change and a supporting justification. Implementation of such changes in the EPP shall not commence prior to NRC approval of the proposed changes in the form of a licensee amendment incorporating the appropriate revision to the EPP.

5.4 Plant Reporting Requirements

A written report shall be submitted to the NRC within 30 days of occurrence of an unusual or important environmental event. The report shall (a) describe, analyze, and evaluate the event, including extent and magnitude of the impact and plant operating characteristics, (b) describe the probable cause of the event, (c) indicate the action taken to correct the reported event, (d) indicate the corrective action taken to preclude repetition of the event and to prevent similar occurrences involving similar components or systems, and (e) indicate the agencies notified and their preliminary responses.

Events reportable under this subsection which also required reports to other Federal, State, or local agencies shall be reported in accordance with those reporting requirements in lieu of the requirements of this subsection. The NRC shall be provided with a copy of each report at the same time it is submitted to the other agency.

ATTACHMENT 3-D

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LASALLE COUNTY STATION

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1.0 OBJECTIVE OF THE ENVIRONMENTAL PROTECTION PLAN

The Environmental Protection Plan (EPP) provides for protection of environmental values during operation of the nuclear facility. The principal objectives of the EPP are as follows:

1) Verify that the Plant is operated in an environmentally acceptable manner, as established by the FES and other NRC environmental impact assessments.

2) Coordinate NRC requirements and maintain consistency with other Federal, State and local requirements for environmental protection.

3) Keep NRC informed of the environmental effects of facility operation and of action taken to control those effects.

Environmental concerns identified in the FES which relate to water quality matters are regulated by way of the licensee's NPDES permit.

Aquatic issues identified in items 1 and 2 above are addressed by the effluent limitations, monitoring requirements and the Section 316(b) demonstration requirement contained in the effective NPDES permit issued by the Federal or State permitting authority. The NRC will rely on these agencies for regulation of these matters as they involve water quality and aquatic biota. The aquatic issued identified in item 3 above has been addressed in correspondence between the NRC and the State of Illinois. The State has been appraised of the intention of the NRC not to include this monitoring and mitigation requirements in this facility license. The NRC will rely on the State of Illinois for the establishment and conduct of this program. This action has been taken in accordance with Section 511(c)(2) of the Clean Water Act which places responsibility for establishment and enforcement of programs for the protection of the aquatic environment with the U.S. Environmental Protection Agency or state(s) granted authority for such programs under the Act.

2.2 Terrestrial Issues

Potential erosion effects along the dike around the cooling lake and the banks of Armstrong Run are addressed in the regulatory requirements of the dam permit issued by the State permitting authority.

The NRC will rely on this State agency for regulation of these matters.

A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns (1) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the final environmental statement (FES) as modified by staff's testimony to the Atomic Safety and Licensing Board, supplements to the FES, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or (2) a significant change in effluents or power level or (3) a matter not previously reviewed and evaluated in the documents specified in (1) of this Subsection, which may have a significant adverse environmental impact.

The licensee shall maintain records of changes in the plant design or operation and of tests and experiments carried out pursuant to this Subsection. These records shall include written evaluations which provide bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question nor constitute a decrease in the effectiveness of this EPP to meet the objectives specified in Section 1.0.

3.2 Reporting Related to the NPDES Permits and State Certification

The licensee shall provide the NRC with copies of the results of the special studies conducted in accordance with the Clean Water Act, at the same time they are submitted to the permitting agency, namely, the Demonstration Study pursuant to Section 316(b) of the Clean Water Act.

The NRC shall be provided with a copy of the current NPDES permit or State Certification within 30 days of approval. Changes to the NPDES permit or State Certification shall be reported to the NRC within 30 days of the date the change is approved.

3.3 Changes Required for Compliance with Other Environmental Regulations

Changes in plant design or operation and performance of tests or experiments that are either regulated or mandated by other Federal, State, or local environmental regulations are not subject to requirements of Section 3.1. However, if any environmental impacts of a change are not evaluated under other Federal, State or local environmental regulations, then those impacts are subject to the requirements of Section 3.1.

4.0 ENVIRONMENTAL CONDITIONS

4.1 Unusual or Important Environmental Events

Any occurrence of an unusual or important event that indicates or could result in significant environmental impact causally related to station operation shall be recorded and promptly reported to the NRC within 24 hours followed by a written report per Subsection 5.4.2. If an event is reportable under 10 CFR 50.72, then a duplicate immediate report under this subsection is not required. However, a follow-up written report is required in accordance with Subsection 5.4.2. The following are examples: excessive bird impaction events, onsite plant or animal disease outbreaks, mortality or unusual occurrence of any species protected by the Endangered Species lot of 1973, fish kills, increase in nuisance organisms or conditions and unanticipated or emergency discharge of waste water or chemical substances.

No routine monitoring programs are required to implement this condition.

4.2 Environmental Monitoring

Environmental monitoring programs are conducted in accordance with the guidance and controls of agencies outside of the NRC. The NRC has recognized the Federal or State agencies as the authorities having jurisdiction in Section 2.0 of this EPP. Therefore, no specific environmental monitoring is required by the NRC under this EPP.

5.0 ADMINISTRATIVE PROCEDURES

5.1 Review and Audit

The licensee shall provide for review and audit of compliance with the Environmental Protection Plan. The audits shall be conducted independently of the individual or groups responsible for performing the specific activity. A description of the organization structure utilized to achieve the independent review and audit function and results of the audit activities shall be maintained and made available for inspection.

5.2 Records Retention

Records associated with this EPP shall be made and retained in a manner convenient for review and inspection. These records shall be made available to NRC on request. Records of modifications to plant structures, systems and components determined to potentially affect the continued protection of the environment shall be retained until the date of the termination of the operating license. All other records and data relating to this EPP shall be retained for five years or, where applicable, in accordance with the requirments of other agencies.

5.3 Changes in Environmental Protection Plan

Requests for changes in the Environmental Protection Plan shall include an assessment of the environmental impact of the proposed change and a support justification. Implementation of such changes in the EPP shall not commence prior to NRC approval of the proposed changes in the form of a licensee amendment incorporating the appropriate revision to the Environmental Protection Plan.

5.4 Station Reporting Requirements

5.4.1 Routine Reports

Deleted

5.4.2 Nonroutine Reports

A written report shall be submitted to the NRC within 30 days of occurrence *of* an unusual or important environmental event. The report shall (a) describe, analyze, and evaluate the event, including extent and magnitude of these impact and plant operating characteristics, (b) describe the probable cause *of* the event, (c) indicate the action taken to correct the reported event, (d) indicate the corrective action taken to preclude repetition of the event and to prevent similar occurrences involving similar components or systems and (e) indicate the agencies notified and their preliminary responses.

Events reportable under this subsection which also require reports to other Federal, State, or local agencies shall be reported in accordance with those reporting requirements in lieu of the requirements of this subsection. The NRC shall be provided with a copy of each report at the same time it is submitted to the other agency.

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APPENDIX B

TO FACILITY OPERATING LICENSE NO. NPF-39

LIMERICK GENERATING STATION

UNIT 1

EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-352

ENVIRONMENTAL PROTECTION PLAN

(NONRADIOLOGICAL)

LIMERICK GENERATING STATION

UNIT 1

ENVIRONMENTAL PROTECTION PLAN

(NONRADIOLOGICAL)

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1.0 Objectives of the Environmental Protection Plan

The Environmental Protection Plan (EPP) is to provide for protection of nonradiological environmental values during operation of the nuclear facility. The principal objectives of the EPP are as follows:

(1) Verify that the facility is operated in an environmentally acceptable manner, as established by the Final Environmental Statement - Operating Licensing Stage (FES-OL) and other NRC environmental impact assessments.

(2) Coordinate NRC requirements and maintain consistency with other Federal, State and local requirements for environmental protection.

(3) Keep NRC informed of the environmental effects of facility operation and of actions taken to control those effects.

Environmental concerns identified in the FES-OL which relate to water quality matters are regulated by way of the licensee's NPDES permit.

(3) Chlorination of station cooling waters for condenser and cooling tower biofouling control may result in some adverse impacts to Schuylkill River biota in the vicinity of the station discharge (FES Section 5.3.2.3)

(4) Operation of the Point Pleasant Diversion will alter the hydrology, aquatic habitats, and water quality of the headwater section of the East Branch of Perkiomen Creek but the diversion waters are expected to provide beneficial dilution of waste loads entering the stream in its middle and lower reaches. (FES Sections 5.3.2.3 and 5.2.2)

(5) The supplemental cooling water withdrawal from Perkiomen Creek using state-of-the-art technology will result in localized effects from entrainment of fish larvae. (FES Section 5.5.2)

2.2 Terrestrial Issues

No specific terrestrial issues were identified by the NRC staff in the FES-OL.

2.3 Noise Issues

(1) Tones from the Point Pleasant pumphouse transformers are predicted to be audible and may cause annoyance at a nearby residence. Noise monitor-

A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns: (1) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the FES-OL, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or (2) a significant change in effluents or power level; or (3) a matter, not previously reviewed and evaluated in the documents specified in (1) of this Subsection, which may have a significant adverse environmental impact.

The licensee shall maintain records of changes in facility design or operation and of tests and experiments carried out pursuant to this Subsection. These records shall include written evaluations which provide bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question or constitute a decrease in the effectiveness of this EPP to meet the objectives specified in Section 1.0.

3.2 Reporting Related to the NPDES Permit and State Certification

Changes to, or renewals of, the NPDES Permits or the State certification shall be reported to the NRC within 30 days following the date the change or renewal is approved. If a permit or certification, in part or in its entirety, is appealed and stayed, the NRC shall be notified within 30 days following the date the stay is granted.

3.3 Changes Required for Compliance with Other Environmental Regulations

Changes in plant design or operation and performance of tests or experiments that are either regulated or mandated by Federal, State, and local environmental regulations are not subject to the requirements of Section 3.1. However, if any environmental impacts of a change are not evaluated under other Federal, State, or local environmental regulations, then those impacts are subject to the requirements of Section 3.1.

4.0 Environmental Conditions

4.1 Unusual or Important Environmental Events

Any occurrence of an unusual or important event that indicates or could result in significant environmental impact causally related to plant operation shall be recorded and reported to the NRC within 24 hours followed by a written report per Subsection 5.4.2. If an event is reportable under 10 CFR 50.72, then a duplicate immediate report under this subsection is not required. However, a follow-up written report is required in accordance with Subsection 5.4.2. The following are examples: excessive bird impaction events, onsite plant or animal disease outbreaks, mortality or unusual occurrence of any species protected by the Endangered Species Act of 1973, fish kills, increase in nuisance organisms or conditions, and unanticipated or emergency discharge of waste water or chemical substances.

No routine monitoring programs are required to implement this condition.

4.2 Environmental Monitoring

4.2.1 Aquatic Monitoring

The certifications and permits required under the Clean Water Act provide mechanisms for protecting water quality and, indirectly, aquatic biota. The NRC will rely on the decisions made by the Commonwealth of Pennsylvania, under the authority of the Clean Water Act, for any requirements for aquatic monitoring

4.2.2 Terrestrial Monitoring

No terrestrial monitoring is required.

4.2.3 Maintenance of Transmission Line Corridors

The use of herbicides within the Limerick Generating Station transmission line corridors (Limerick to Cromby, Cromby to Plymouth Meeting, Cromby to North Wales, and Limerick to Whitpain) shall conform to the approved use of selected herbicides as registered by the Environmental Protection Agency and approved by Commonwealth authorities and applied as directed on the pesticide label.

4.2.4 Noise Monitoring

All initial Environmental Noise Assessments have been completed.

The information in Subsections 4.2.4.1, 4.2.4.2, 4.2.4.3, and 4.2.4.4 has been deleted.

Pages 4-4, 4-5, 4-6 and 4-7 have been removed from this Section.

5.0 Administrative Procedures

5.1 Review and Audit

The licensee shall provide for review and audit of compliance with the EPP. The audits shall be conducted independently of the individual or groups responsible for performing the specific activity. A description of the organization structure utilized to achieve the independent review and audit function and results of the audit activities shall be maintained and made available for inspection.

5.2 Records Retention

Records associated with this Environmental Protection Plan shall be made and retained in a manner convenient for review and inspection. These records shall be made available to NRC on request.

Records of modifications to station structures, systems and components determined to potentially affect the continued protection of the environment shall be retained until the date of termination of the operating license. All other records relating to this EPP shall be retained for five years or, where applicable, in accordance with the requirements of other agencies.

5.3 Changes in Environmental Protection Plan

Requests for changes in the EPP shall include an assessment of the environmental impact of the proposed change and a supporting justification. Implementation of such changes in the EPP shall not commence prior to NRC approval of the proposed changes in the form of a license amendment incorporating the appropriate revision to the EPP.

5.4 Plant Reporting Requirements

5.4.1 Deleted

5.4.2 Nonroutine Reports

A written report shall be submitted to the NRC within 30 days of occurrence of an Unusual or Important Environmental event. The report shall (a) describe, analyze, and evaluate the event, including extent and magnitude of the impact, and plant operating characteristics, (b) describe the probable cause of the event, (c) indicate the action taken to correct the reported event, (d) indicate the corrective

APPENDIX B

TO FACILITY OPERATING LICENSE NO. NPF-85

LIMERICK GENERATING STATION

UNIT 2

EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-353

ENVIRONMENTAL PROTECTION PLAN

(NON-RADIOLOGICAL)

August 25, 1989

LIMERICK GENERATING STATION

UNIT 2

ENVIRONMENTAL PROTECTION PLAN

(NON-RADIOLOGICAL)

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1.0 OBJECTIVES OF THE ENVIRONMENTAL PROTECTION PLAN

The Environmental Protection Plan (EPP) is to provide for protection of non-radiological environmental values during operation of the nuclear facility. The principal objectives of the EPP are as follows:

(1) Verify that the facility is operated in an environmentally acceptable manner, as established by the Final Environmental Statement-Operating License Stage (FES-OL) and other NRC environmental impact assessments.

(2) Coordinate NRC requirements and maintain consistency with other Federal, State and local requirements for environmental protection.

(3) Keep NRC informed of the environmental effects of facility operation and of actions taken to control those effects.

Environmental concerns identified in the FES-OL which relate to water quality matters are regulated by way of the licensee's NPDES permit.

power level; or (3) a matter not previously reviewed and evaluated in the documents specified in (1) of this Subsection, which may have a significant adverse environmental impact.

The licensee shall maintain records of changes in facility design or operation and of tests and experiments carried out pursuant to this Subsection. These records shall include written evaluations which provide bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question or constitute a decrease in the effectiveness of the EPP to meet the objectives specified in Section 1.0.

3.2 Reporting Related to the NPDES Permit and State Certification

Changes to, or renewals of, the NPDES Permit or the State certification shall be reported to the NRC within 30 days following the date the change or renewal is approved. If a permit or certification, in part or in its entirety, is appealed and stayed, the NRC shall be notified within 30 days following the date the stay is granted.

3.3 Changes Required for Compliance with Other Environmental Regulations

Changes in plant design or operation and performance of tests or experiments that are either regulated or mandated by Federal, State and local environmental regulations are not subject to the requirements of Section 3.1. However, if any environmental impacts of a change are not evaluated under other Federal, State, or local environmental regulations, then those impacts are subject to the requirements of Section 3.1.

4.0 ENVIRONMENTAL CONDITIONS

4.1 Unusual or Important Environmental Events

Any occurrence of an unusual or important event that indicates or could result in significant environmental impact causally related to plant operation shall be recorded and reported to the NRC within 24 hours followed by a written report per Subsection 5.4.2. If an event is reportable under 10 CFR 50.72, then a duplicate immediate report under this subsection is not required. However, a follow-up written report is required in accordance with Subsection 5.4.2. The following are examples: excessive bird impaction events, onsite plant or animal disease outbreaks, mortality or unusual occurrence of any species protected by the Endangered Species Act of 1973, fish kills, increase in nuisance organisms or conditions, and unanticipated or emergency discharge of waste water or chemical substances.

No routine monitoring programs are required to implement this condition.

4.2 Environmental Monitoring

4.2.1 Aquatic Monitoring

The certifications and permits required under the Clean Water Act provide mechanisms for protecting water quality and, indirectly, aquatic biota. The NRC will rely on the decisions made by the Commonwealth of Pennsylvania, under the authority of the Clean Water Act, for any requirements for aquatic monitoring.

4.2.2 Terrestrial Monitoring

No terrestrial monitoring is required.

4.2.3 Maintenance of Transmission Line Corridors

The use of herbicides within the Limerick Generating Station transmission line corridors (Limerick to Cromby, Cromby to Plymouth Meeting, Cromby to North Wales, and Limerick to Whitpain) shall conform to the approved use of selected herbicides as registered by the Environmental Protection Agency and approved by Commonwealth authorities and applied as directed on the pesticide label.

4.2.4 Noise Monitoring

All initial Environmental Noise Assessments have been completed.

The information in Subsections 4.2.4.1, 4.2.4.2, 4.2.4.3, and 4.2.4.4 has been deleted.

Pages 4-3, 4-4, and 4-5 have been removed from this Section.

5.0 ADMINISTRATIVE PROCEDURES

5.1 Review and Audit

The licensee shall provide for review and audit of compliance with the EPP. The audits shall be conducted independently of the individual or groups responsible for performing the specific activity. A description of the organizational structure utilized to achieve the independent review and audit function and results of the audit activities shall be maintained and made available for inspection.

5.2 Records Retention

Records associated with this Environmental Protection Plan shall be made and retained in a manner convenient for review and inspection. These records shall be made available to NRC on request.

Records of modifications to station structures, systems and components determined to potentially affect the continued protection of the environment shall be retained until the date of termination of the operating license. All other records relating to this EPP shall be retained for five years or, where applicable, in accordance with the requirements of other agencies.

5.3 Changes in Environmental Protection Plan

Request for changes in the EPP shall include an assessment of the environmental impact of the proposed change and a supporting justification. Implementation of such changes in the EPP shall not commence prior to NRC approval of the proposed changes in the form of a license amendment incorporating the appropriate revision to the EPP.

5.4 Plant Reporting Requirements

5.4.1 Deleted

Amendment No.

5.4.2 Nonroutine Reports

A written report shall be submitted to the NRC within 30 days of occurrence of an Unusual or Important Environmental event. The report shall (a) describe, analyze, and evaluate the event, including extent and magnitude of the impact and plant operating characteristics, (b) describe the probable cause of the event, (c) indicate the action taken to correct the reported event, (d) indicate the corrective action taken to preclude repetition of the event and to prevent similar occurrences involving similar components or systems, and (e) indicate the agencies notified and their preliminary responses.

Events reportable under this subsection which also require reports to other Federal, State or local agencies shall be reported in accordance with those reporting requirements in lieu of the requirements of this subsection. The NRC shall be provided a copy of such report at the same time it is submitted to the other agency.

ATTACHMENT 3-F

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Appendix B Changes

OYSTER CREEK NUCLEAR GENERATING STATION

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1.0 Environmental Monitoring

1.1 Non-Radiological Monitoring

1.1.1 Biotic - Aquatic

A. Fish Kill Monitoring Program

Objective

The objective of this program is to determine the species composition, abundance and distribution of station-induced fish kills due to winter shutdowns.

Specifications

After each Station shutdown, when the intake water temperature is below 8.5 degrees C (47.3 degrees F), visual inspections for fish shall be made along the shores of the discharge canal and the lower reaches of Oyster Creek within 24 hours of the initiation of the shutdown in accordance with the procedures prepared by the licensee per Section 3.4. A continuous temperature record shall be maintained through the 24-hour period after reaching cold shutdown.

Reporting Requirements

For planned shutdowns with the temperature of the intake water below 8.5 degrees C (47.3 degrees F), the NRC Region I office will be notified at least 24 hours in advance of such shutdown. This notification shall not be given for unplanned, automatic, or manual station trips.

If the shutdown results in greater than 100 fish killed and/or stressed, this event shall be reported to the NRC in accordance with Section 3.5.2.

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2.0 Special Monitoring And Study Activities

2.1 Unusual or Important Environmental Events

Enviromnental Monitoring Requirements

Unusual or important events are those that cause potentially significant environmental impact or that could be of public interest concerning environmental impact from station operation. The following are examples: on-site plant or animal disease outbreaks; unusual mortality of any species protected by the Endangered Species Act of 1973; fish kills in the vicinity of the site; unusually high impingement mortality episodes.

Action

Should an unusual or important event occur, the licensee shall make a non-routine prompt report to the NRC in accordance with the provisions of Subsection 3.5.2.

If an event is reportable under 10 CFR 50.72, then a duplicate immediate report is not required. However, a follow-up written report is required in accordance with Subsection 3.5.2.

3.0 ADMINISTRATIVE CONTROL

This section describes administrative and management controls established by the Applicant to provide continuing protection to the environment and to implement the environmental technical specifications.

3.1 Responsibility

Corporate responsibility for implementation of the Oyster Creek Environmental Technical Specifications and for assuring that plant operations are controlled in such a manner as to provide continuing protection of the environment has been assigned by the Chief Nuclear Officer to the Vice President - Oyster Creek.

The responsibility for conducting the studies as set forth in Section 1.1 (Non-Radiological Monitoring) and all of Section 2.0 (Special Monitoring and Study Activities) rests with the management position responsible for environmental affairs, who reports to the Vice President - Oyster Creek.

Administrative measures are defined in Section 3.3 which provide that the individual or group responsible for auditing or otherwise verifying that an activity has been correctly performed is independent of the individual or group responsible for performing the activity.

3.2 Organization

Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to and including operating organization positions. Organizational charts will be documented in the Updated FSAR and updated in accordance with 10 CFR 50.71e.

3.3 Review and Audit

Independent audit and review functions for environmental matters are the responsibility of the management position responsible for environmental affairs. This department is independent of line responsibility for the operation of the plant. The independent reviews and audits of the OCETS will be carried out by personnel from environmental affairs or by other AmerGen personnel, outside contractors or consultants at the request of the environmental affairs Personnel.

When individuals in the environmental affairs department of AmerGen perform any function relating to the OCETS other than independent audit and review, the Vice President - Oyster Creek will ensure that an independent review and audit of that work is performed by another individual in the environmental affairs department or some other who is not directly responsible for the specific activity being, reviewed and audited.

The audits and reviews will be performed as required by the Quality Assurance Topical Report (QATR).

Independent audits and reviews will encompass:

A. Coordination of the OCETS with the safety technical specifications to avoid conflicts and maintain consistency.

B. Compliance of station activities and operations with the OCETS.

C. Adequacy of the programs and station procedures which are involved in ensuring the plant is operated in accordance with the OCETS.

D. The proper functioning in accordance with the responsibilities listed in Section 3.1 of the OCETS.

E. Proposed changes to the OCETS and the evaluation of the impacts resulting from the changes.

F. Proposed written procedures, as described in Section 3.4.1 and proposed changes thereto which affect the environmental impact of the plant.

G. Proposed changes or modifications to plant systems or equipment and a determination of the environmental impact resulting from the changes.

H. Adequacy of investigations of violations of the OCETS and adequacy of and implementation of the recommendations to prevent recurrence of the violations.

3.4 Procedures

3.4.1 Detailed written procedures, including applicable check lists and instructions, will be prepared and adhered to for all activities involved in carrying out OCETS.

3.5 Plant Reporting Requirements

3.5.1 DELETED

3.5.2 Non-Routine Environmental Operating Reports

A prompt report shall be submitted in the event that an Unusual or Important Environmental Event occurs (as specified in Section 2.1). Such an occurrence will be reported within 24 hours to the NRC and within 30 days by a written report in accordance with 10 CFR 50.4. If an event is reportable under 10 CFR 50.72, then a duplicate immediate report is not required. However, a follow-up written report is required. The written report and, to the extent possible, the preliminary report shall (a) describe, analyze, and evaluate the occurrence, including the extent and magnitude of the impact, (b) describe the cause of the occurrence, and (c) indicate the corrective action, if necessary, taken (including any significant changes made in the procedures) to preclude repetition of the occurrence should the occurrence be station related.

3.5.3 Change in Environmental Technical Specifications

A. A report shall be made to the NRC prior to implementation of a change in plant design, in plant operation, or in procedures described in Section 3.4, only if the change would have a significant adverse effect on the environment or involves an environmental matter or question not previously reviewed and evaluated by the NRC. The report shall include a description and evaluation of the changes and a supporting justification.

B. Request for changes in environmental technical specifications shall be submitted in accordance with 10 CFR 50.90.

C. Changes or additions to required Federal, and State permits and certificates for the protection of the environment that pertain to the requirements of OCETS shall be reported to the NRC within 30 days of approval by the appropriate permitting authority. In the event that the licensee initiates or becomes aware of a request for changes to any of the water quality requirements, limits or values stipulated in any certification or permit issued pursuant to Section 401 or 402 of the Federal Water Pollution Control Act (PL 92-500) which is also the subject of an OCETS reporting requirement, NRC shall be notified following approval by the authorizing agency. The notification to the NRC shall include an evaluation of the environmental impact of the revised requirement, limit or value being sought.

3.6 Records Retention

3.6.1 Eighty (80%) percent data recovery annually for each environmental monitoring requirement is considered satisfactory for the purposes of the OCETS. The variability and uncertainty of environmental conditions demand allowance for some missed data in order to preclude an excessive reporting burden. This provision for missed data does not permit deliberate omission of sample collection or analyses but rather is meant to cover data missed due to circumstances beyond the control of the licensee, its representative or subcontractor. Records of the reasons for all missed data shall be retained with the data reports.

3.6.2 Records relative to the following areas will be retained until the date of termination of the Operating License.

A. Records and drawings detailing plant design changes made to systems and equipment as described in Section 3.5.3.

B. Records of all environmental surveillance data.

3.6.3 All other records relating to the environmental technical specifications will be retained for five years following recording.

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Typed Pages for

Appendix B Changes

PEACH BOTTOM ATOMIC POWER STATION UNIT 2

REVISED APPENDIX B PAGES

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PEACH BOTTOM ATOMIC POWER STATION UNIT 3

REVISED APPENDIX B PAGES

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Appendix B Environmental Technical Specifications

1.2 Reviews and Audits

1.2.1 Plant Reviews and Audits

Reviews and audits of plant operation are described in the Quality Assurance Topical Report (QATR).

Appendix B Environmental Technical Specifications

1.3 Environmental Deviations

1.3.1 Environmental Deviations shall be reported immediately to the Plant Manager or designee.

Environmental Deviations include exceeding a protection limit or report level or, in the opinion of the Plant Manager, an event involving significant environmental impact. A protection limit is a numerical limit on plant effluent or operating parameter which, when not exceeded, should not result in an unacceptable environmental impact. A report level is the numerical value of an environmental parameter below which the environmental impact is considered reasonable on the basis of available information.

1.3.2 Deleted

1.3.3 Environmental Deviations shall be reported to the NRC as specified in Section 1.4.2.1.

1.3.4 If environmental monitoring programs detect harmful effects or evidence of irreversible damage not considered in the Final Environmental Statement, an analysis of the problem and a plan of action to eliminate or significantly reduce the detrimental effects of the damage shall be prepared and provided to the NRC.

Appendix B Environmental Technical Specifications

1.4 Reporting Requirements

1.4.1 Deleted

1.4.2 Non-Routine Reports

1.4.2.1 Environmental Deviation Reports

In the event of an Environmental Deviation as defined in Section 1.3.1, notification shall be made within 24 hours to the NRC. A written report shall follow within 30 days to the NRC in accordance with 10 CFR 50.4.

If an event is reportable under 10 CFR 50.72, then a duplicate immediate report under this subsection is not required. However, a follow-up written report is required.

The written report on an Environmental Deviation, and to the extent possible, the preliminary notification, should:

a. Describe, analyze, and evaluate implications of the Environmental Deviation;

b. Identify the cause of the occurrence; and

c. Indicate the corrective action (including any significant change made in procedures) taken to prevent similar occurrences involving similar components or systems.

(continued)

Appendix B Environmental Technical Specifications

1.4 Reporting Requirements (continued)

1.4.2.2 Reporting Changes to the Plant or Permits

A written report, including an evaluation of the environmental impact resulting from a change, shall be forwarded to the NRC in accordance with 10 CFR 50.4 in the event of:

a. Changes to the plant that affect the environmental impact evaluation contained in the Environmental Report or the Environmental Statement.

b. Changes or additions to permits and certificates required by Federal, State, local and regional authorities for the protection of the environment. When submittals of changes are approved by the concerned agency, a copy shall be submitted to the NRC.

c. Requests for changes in Environmental Technical Specifications.

Appendix B Environmental Technical Specifications

1.5 Record Retention

1.5.1 Records Retained for 5 Years

Records relative to the following items shall be kept in a manner convenient for review and shall be retained for 5 years, unless a longer period is required by applicable regulations.

a. Records of principal maintenance activities of equipment pertaining to environmental impact.

b. Records of Environmental Deviations.

c. Records of periodic checks, inspections and/or calibrations performed to verify that environmental surveillance requirements are being met.

d. Deleted

e. Records of changes made to operating procedures, equipment, permits or certificates.

1.5.2 Records Retained until the date of termination of the operating license.

Records of off-site environmental radiation surveys shall be retained until the date of termination of the operating license.

Appendix B Environmental Technical Specifications

1.2 Reviews and Audits

1.2.1 Plant Reviews and Audits

Reviews and audits of plant operation are described in the Quality Assurance Topical Report (QATR).

Appendix B Environmental Technical Specifications

1.3 Environmental Deviations

1.3.1 Environmental Deviations shall be reported immediately to the Plant Manager or designee.

Environmental Deviations include exceeding a protection limit or report level or, in the opinion of the Plant Manager, an event involving significant environmental impact. A protection limit is a numerical limit on plant effluent or operating parameter which, when not exceeded, should not result in an unacceptable environmental impact. A report level is the numerical value of an environmental parameter below which the environmental impact is considered reasonable on the basis of available information.

1.3.2 Deleted

1.3.3 Environmental Deviations shall be reported to the NRC as specified in Section 1.4.2.1.

1.3.4 If environmental monitoring programs detect harmful effects or evidence of irreversible damage not considered in the Final Environmental Statement, an analysis of the problem and a plan of action to eliminate or significantly reduce the detrimental effects of the damage shall be prepared and provided to the NRC.

Appendix B Environmental Technical Specifications

1.4 Reporting Requirements

1.4.1 Deleted

1.4.2 Non-Routine Reports

1.4.2.1 Environmental Deviation Reports

In the event of an Environmental Deviation as defined in Section 1.3.1, notification shall be made within 24 hours to the NRC. A written report shall follow within 30 days to the NRC in accordance with 10 CFR 50.4.

If an event is reportable under 10 CFR 50.72, then a duplicate immediate report under this subsection is not required. However, a follow-up written report is required.

The written report on an Environmental Deviation, and to the extent possible, the preliminary notification, should:

a. Describe, analyze, and evaluate implications of the Environmental Deviation;

b. Identify the cause of the occurrence; and

c. Indicate the corrective action (including any significant change made in procedures) taken to prevent similar occurrences involving similar components or systems.

(continued)

Appendix B Environmental Technical Specifications

1.4 Reporting Requirements (continued)

1.4.2.2 Reporting Changes to the Plant or Permits

A written report, including an evaluation of the environmental impact resulting from a change, shall be forwarded to the NRC in accordance with 10 CFR 50.4 in the event of:

a. Changes to the plant that affect the environmental impact evaluation contained in the Environmental Report or the Environmental Statement.

b. Changes or additions to permits and certificates required by Federal, State, local and regional authorities for the protection of the environment. When submittals of changes are approved by the concerned agency, a copy shall be submitted to the NRC.

c. Requests for changes in Environmental Technical Specifications.

Appendix B Environmental Technical Specifications

1.5 Record Retention

1.5.1 Records Retained for 5 Years

Records relative to the following items shall be kept in a manner convenient for review and shall be retained for 5 years, unless a longer period is required by applicable regulations.

a. Records of principal maintenance activities of equipment pertaining to environmental impact.

b. Records of Environmental Deviations.

c. Records of periodic checks, inspections and/or calibrations performed to verify that environmental surveillance requirements are being met.

d. Deleted

e. Records of changes made to operating procedures, equipment, permits or certificates.

1.5.2

Records Retained until the date of termination of the operating license.

Records of off-site environmental radiation surveys shall be retained until the date of termination of the operating license.

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1.0 Objectives of the Environmental Protection Plan

The Environmental Protection Plan (EPP) is to provide for protection of environmental values during operation of the nuclear facility. The principal objectives of the EPP are as follows:

(1) Verify that the plant is operated in an environmentally acceptable manner, as established by the FES and other NRC environmental impact assessments.

(2) Coordinate NRC requirements and maintain consistency with other Federal, State and local requirements for environmental protection.

(3) Keep NRC informed of the environmental effects of facility operation and of actions taken to control those effects.

Environmental concerns identified in the FES which relate to water quality matters are regulated by way of the licensee's National Pollutant Discharge Elimination System (NPDES) permit, issued by the Illinois Environmental Protection Agency.

documents specified in (1) of this Subsection, which may have significant adverse environmental impact.

The licensee shall maintain records of changes in facility design or operation and of tests and experiments carried out pursuant to this Subsection. These records shall include written evaluations which provide bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question.

2.2 Reporting Related to the NPDES Permits and State Certifications

Violations of the NPDES Permit or the State certification (pursuant to Section 401 of the Clean Water Act) shall be reported to the NRC by submittal of copies of the reports required by the NPDES Permit or certification. The licensee shall also provide the NRC with copies of the results of environmental studies at the same time they are submitted to the permitting agency.

The NRC shall be provided with a copy of the current NPDES permit or State certification within 30 days of approval. Changes to the NPDES permit or State certification shall be reported to the NRC within 30 days of the date the change is approved.

2.3 Changes Required for Compliance with Other Environmental Regulations

Changes in plant design or operation and performance of tests or experiments that are either regulated or mandated by other Federal, State, or local environmental regulations are not subject to the requirements of Section 2.1. However, if any environmental impacts of a change are not evaluated under other Federal, State or local environmental regulations, then those impacts are subject to the requirements of Section 2.1.

3.0 Environmental Conditions

3.1 Unusual or Important Environmental Events

Any occurrence of an unusual or important event that indicates or could result in significant environmental impact causally related to station operation shall be recorded and promptly reported to the NRC within 24 hours followed by a written report within 30 days. If an event is reportable under 10 CFR 50.72, then a duplicate immediate report under this subsection is not required. However, the follow-up written report is still required. No routine monitoring programs are required to implement this condition.

The written report shall (a) describe, analyze, and evaluate the event, including extent and magnitude of the impact and plant operating characteristics, (b) describe the probable cause of the event, (c) indicate the action taken to correct the reported event, (d) indicate the corrective action taken to preclude repetition of the event and to prevent similar occurrences involving similar components or systems, and (e) indicate the agencies notified and their preliminary responses.

Events reportable under this subsection which also require reports to other Federal, State or local agencies shall be reported in accordance with those reporting requirements in lieu of the requirements of this subsection. The NRC shall be provided a copy of such report at the same time it is submitted to the other agency.

The following are examples of unusual or important events: excessive bird impaction events; onsite plant or animal disease outbreaks; mortality or unusual occurrence of any species protected by the Endangered Species Act of 1973; unusual fish kills; increase in nuisance organisms or conditions; and unanticipated or emergency discharge of waste water or chemical substances.

1.0 Objectives of the Environmental Protection Plan

The Environmental Protection Plan (EPP) is to provide for protection of environmental values during operation of the nuclear facility. The principal objectives of the EPP are as follows:

(1) Verify that the plant is operated in an environmentally acceptable manner, as established by the FES and other NRC environmental impact assessments.

(2) Coordinate NRC requirements and maintain consistency with other Federal, State and local requirements for environmental protection.

(3) Keep NRC informed of the environmental effects of facility operation and of actions taken to control those effects.

Environmental concerns identified in the FES which relate to water quality matters are regulated by way of the licensee's National Pollutant Discharge Elimination System (NPDES) permit, issued by the Illinois Environmental Protection Agency.

The licensee shall maintain records of changes in facility design or operation and of tests and experiments carried out pursuant to this Subsection. These records shall include written evaluations which provide bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question.

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