

APPENDIX B  
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)

**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. 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 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 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.