

Comments on draft RAIs Pertaining to cooling towers

We are confused about the distinction between #1 and #2, at least as to environmental analyses. #2 is asking for something resembling engineering studies, and #1 is asking for analyses of environmental impacts, so we don't understand the reference to environmental studies in #2 - isn't that the same as what is asked for in #1?

Regardless of which one we are talking about, do you only want the results of existing studies or the updates we may have?

Reading the first paragraph we think you are only considering cooling towers as an alternative, but when you get to #4, it could be interpreted that you are looking for analysis of ponds, as well. Do you want that or only things that are relevant to cooling towers?

In #4, we are interpreting that "if available" to also mean existing studies, not to performing an impact analysis on the closed-cycle cooling options in Table B-1 (or just the CT options). We assume you would not consider using groundwater as makeup water, correct? That would get us air permitted, but I doubt you could get permitted to pull that much water from the aquifer, if it were available.

The first question dealing with refurbishment relates to how this construction project would take place. The majority of construction could occur outside of an outage (as in any other construction project on-site, for, say, an office building, since the plant tie-ins would only have to occur with the plant shutdown. That tie-in, depending on how the construction schedule works out, could essentially be completed in the same ballpark duration as a prolonged refuel outage. If that is the case, would it constitute 'refurbishment'? As a point of reference, I am not aware of any construction scheduling or man-loaded schedule for this potential possibility.

Refurbishment looks at surface water use and quality, and aquatic resources (from construction impacts; minimal due to BMPs), groundwater use and quality (some if you use groundwater for the batch plant, construction workforce, dust suppression, etc), impacts to terrestrial resources (none - if previously disturbed area), air quality (minimal - construction equipment), rad exposure to the public (some) and occupational (none), housing, public services, and offsite land use (We would guess none given the population in the area and the size of the workforce), cultural resources (if previously disturbed - none), aesthetics (and construction noise which isn't part of GEIS) (yes?). The next question is, if we did a quick look at performing this during the renewal term and examined the impacts analysis in the GEIS for major refurbishment, would it be possible to state that we would be bounded by the impacts analysis for major refurbishment items in the GEIS (see Table 2.8)?

Finally, why is this 'quite likely' to occur during the renewal term? Is this not also possibility for any plant during the renewal term, especially considering that is up to how the State interprets and enforces the Phase II rules?

yes

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