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April 18, 2006

52.17

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

**Early Site Permit (ESP) Application for the Clinton ESP Site**  
**NRC Docket No. 52-007**

**Subject: Submittal of Additional Reference Information to Support Revision 4 to Exelon Generation Company's Early Site Permit Application**

Enclosed is a record of telephone / e-mail communications between Exelon's contractor (CH2MHILL) and the USACOE on the use of soil infiltration rates in southern Illinois. This information was requested by the Staff to support their review of Revision 4 to the Exelon Generation Company (EGC), LLC's Early Site Permit application.

If you have any questions or require additional information, please contact Chris Kerr of my staff at 610-765-5814.

Sincerely yours,



Marilyn C. Kray  
Vice President, Project Development

CJK/cjk

cc: U.S. NRC Regional Office (w/enclosure)  
Mr. John Segala (NRC) (w/enclosure)  
Mr. Tom Kenyon (NRC) (w/enclosure)

Enclosure: Telephone Conversation / E-Mail Record for Discussion between CH2MHILL and USACOE on Soil Infiltration Rates in Southern Illinois, March 20, 2006

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**AFFIDAVIT OF MARILYN KRAY**

State of Pennsylvania

County of Chester

The foregoing document was acknowledged before me, in and for the County and State aforesaid, by Marilyn C. Kray, who is Vice President, Project Development, of Exelon Generation Company, LLC. She has affirmed before me that she is duly authorized to execute and file the foregoing document on behalf of Exelon Generation Company, LLC, and that the statements in the document are true to the best of her knowledge and belief.

Acknowledged and affirmed before me this 18<sup>th</sup> day of April, 2006.

My commission expires 10-6-07.

Vivia V. Gallimore

COMMONWEALTH OF PENNSYLVANIA  
Notarial Seal  
Vivia V. Gallimore, Notary Public  
Kennett Square Boro, Chester County  
My Commission Expires Oct. 6, 2007  
Member, Pennsylvania Association Of Notaries

# CH2MHILL TELEPHONE CONVERSATION RECORD

**Call To:** Marvin Martens, MVR, USACE  
**Phone No.:** 309-794-5222 **Date:** March 20, 2006  
**Call From:** Joseph Stuber  
**Message Taken By:** Joseph Stuber  
**Subject:** Use of Infiltration Rates in Central Illinois

The following are notes of a conversation with Marvin Martens, and Chris Trefry. The yellow highlights are Mr. Martens's corrections. I have also included the e-mail communications between me and Mr. Martens in these notes.

## Phone Conversation Notes

**Call To:** US Army Corps of Engineers Rock Island District (309-794-5222)  
Marvin Martens/Chief of Hydrologic Section/COE  
Chris Trefry/COE  
**Date:** March 20, 2006  
**Call From:** Joseph Stuber/CH2M HILL

Mr Stuber began the discussion with a brief overview of the situation. The location being studied is the Clinton Lake Watershed. The task at hand is to establish the probable maximum flood level for a plant site on Clinton Lake. I noted that we were using HEC-HMS model to establish runoff for the lake watershed. I noted that we used both the SCS and Snyder methods for determining runoff with consistent results for both methods. I noted that the watershed was dominant agriculture and Hydrologic Soil Group B. For the SCS method we used an initial abstraction and composite runoff curve number to represent the infiltration rate (between 0.15 and 0.30-inches per hour for Group B soils according to TR-55). For the Snyder method we used an initial abstraction and average infiltration rate of 0.10-inches per hour.

I asked if they reduce the infiltration rate (or the runoff curve number for the SCS method) when they go from establishing the 100-year flood to establishing the PMF. They answered that they typically do not. There was considerable discussion. They typically use the same curve number for both situations. Mr. Martens acknowledged that the infiltration rates would likely decrease with saturated soils. He agreed with our approach to use a curve number toward the higher end of the range resulting in less infiltration loss to accommodate this situation. He said that this is the approach that they use also.

I asked what runoff method they typically use for establishing flood levels. Again there was considerable discussion. They typically use the SCS method that requires selection of a runoff curve number.

Recorded By: Joseph Stuber

**From:** Joe.Stuber@CH2M.com [mailto:Joe.Stuber@CH2M.com]  
**Sent:** Thursday, April 06, 2006 10:25 AM  
**To:** Martens, Marvin R MVR  
**Subject:** Recent Phone Call Regarding Hydrology in Central Illinois

Dear Mr. Martens,

Thank you for providing me with your guidance on hydrologic methods for establishing flood levels in the Corps of Engineers Rock Island District. I would appreciate it if you could review my notes from our phone conversation to be sure I have received your comments accurately. This is an important step in the NRC permit process as the NRC reviewers have asked that our analysis be consistent with the methods used by the local Corps Office. If necessary please review and edit the text below to be consistent with your recall of our conversation and return this e-mail (even if you do not make any changes).

Thank again for your advice and assistance on this matter.

Regards,

Joseph Stuber  
CH2M HILL  
135 South 84th Street Suite 325  
Milwaukee, WI 53214  
414-847-0264

Mr. Martens replied:

**From:** Martens, Marvin R MVR [mailto:Marvin.R.Martens@mvr02.usace.army.mil]  
**Sent:** April 06, 2006 3:22 PM  
**To:** Stuber, Joe/MKE  
**Subject:** RE: Recent Phone Call Regarding Hydrology in Central Illinois

Hi Joe, A couple of minor changes highlighted in yellow in your message below:

Thanks,

*Marvin R. Martens*

Marvin R. Martens  
Chief, Hydrologic Engineering Section  
Rock Island District USACE  
Clock Tower Building  
Rock Island, Illinois 61204-2004  
phone: (309) 794-5222  
e-mail: marvin.r.martens@usace.army.mil

Mr. Martens's message contained the highlighted changes in the telephone conversation notes provided above.

*Joseph Stuber*  
Joseph Stuber

**AFFIDAVIT OF JOSEPH STUBER**

State of Wisconsin

County of Milwaukee

The foregoing document was acknowledged before me, in and for the County and State aforesaid, by Joseph Stuber. He has affirmed before me that he is an employee of CH2M HILL and that the statements in the above document are true to the best of his knowledge and belief.

Acknowledged and affirmed before me this 12<sup>th</sup> day of April, 2006.

My commission expires 9/21/08.

Dale DUBS  
Notary Public