



Palisades Nuclear Plant

Operated by Nuclear Management Company, LLC

May 15, 2006

10 CFR 54

Chief, Rules and Directives Branch  
Division of Administrative Services  
Office of Administration  
Mailstop T-6D59  
U.S. Nuclear Regulatory Commission,  
Washington, DC 20555-0001

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71 FR 9383  
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RULES AND DIRECTIVES  
BRANCH  
USNRC

Palisades Nuclear Plant  
Docket 50-255  
License No. DPR-20

Comments Regarding Draft Supplement 27 to the Generic Environmental Impact Statement for License Renewal of Nuclear Plants, NUREG 1437, for Palisades Nuclear Plant License Renewal

In Federal Register Notice 71 FR 9383, the NRC announced the availability of Draft Supplement 27 to NUREG 1437, Generic Environmental Impact Statement for License Renewal of Nuclear Power Plants, and established a public comment period. Draft Supplement 27 pertains to the renewal of the operating license of the Palisades Nuclear Plant.

Nuclear Management Company, LLC (NMC) has reviewed the Draft Supplemental Environmental Impact Statement (DSEIS), and has developed several comments for NRC consideration. NMC's comments are provided in Enclosure 1.

Please contact Mr. Robert Vincent, Palisades License Renewal Project Manager, at 269-764-2559, if you require additional information.

Paul A. Harden  
Site Vice President, Palisades Nuclear Plant  
Nuclear Management Company, LLC

Enclosure (1)

cc: License Renewal Environmental Project Manager, Palisades, USNRC

F-RIDS=ADM-03

SIS Review Complete

add = Bo Pham (bomp)  
C. Guerrero (CX93)

Template-ADM-013

**Enclosure 1**

**Nuclear Management Company Comments  
on Draft Supplement 27 to NUREG 1437**

**(4 Pages)**

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<b>Comment number</b>	<b>Page Number</b>	<b>Line Number</b>	<b>Proposed Change</b>
1	2-4	22	Suggest that text specifically state the Covert Generating Station is owned and operated independently of Palisades.
2	2-5	1	Replace "40-ac" with "400-ac" (See ER <sup>1</sup> p 2-1)
3	2-12	4-12	The new Radwaste system became operational in December 2005. Change "NMC is planning to modify ..." to "NMC has modified ...." Remove 2 sentences describing old radwaste system. Change "The system NMC plans to install relies ..." to "The system relies ...."
4	2-12	14	Change "The equipment NMC plans to install ..." to "The equipment NMC has installed ...."
5	2-14	39-40	Change to "Sanitary waste is sent to three onsite septic systems." (See DSEIS Figure 2-3)
6	2-19	1-2	Change "plant area" to "protected area".
7	2-19	18	Change "OLs" to "OL"
8	2-22	25	The NPDES Permit (corrected copy of 11/8/04 submitted to NRC in letter dated 12/8/04) requires outfall observations five times per week. Suggest changing last word from "day" to "week".
9	2-23	5	Suggest adding third sentence to the paragraph which states, "Clam-Trol treatments are no longer required to be recorded in Palisades' DMRs, but monitoring during Clam-Trol treatments is performed in accordance with the NPDES permit."
10	2-23	8-9	Revise sentence to state, "Temperature data collection at monitoring point 001A is conducted in accordance with the NPDES permit." As written, sentence implies, incorrectly, that monitoring was not conducted prior to 2005.
11	2-23	13	Suggest defining "several" by stating the number of spills cited within the last five years.
12	2-24	7	Correct name of facility is the "Benton Harbor-St. Joseph Wastewater Plant."
13	2-25	27	Wind class differs from wind class given on DSEIS p. 8-45 line 21
14	2-26	16	Change "2350" to "2500". The rated capacity of the diesel generators is 2500kw per FSAR Section 8.4.

<sup>1</sup> ER refers to Applicant's Environmental Report submitted with the Application for Renewed Operating License. (ADAMS Accession No. ML050940449)

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15	2-49	35	Change "NMC performed an assessment ..." to "NMC performs an annual assessment..."
16	2-51	Table 2-3	Suggest adding footnote "Figures may not add due to rounding."
17	2-52	34-35	Fire protection services are provided by the Covert Township Fire Department and the South Haven Fire Department
18	2-54	19	Change "Table 2.6" to "Table 2-6"
19	2-55	23-25	Stated building heights are not correct. Suggest either deleting heights or replacing with the following approximate values: turbine building - 94 ft; containment building 192 ft; auxiliary building - 108 ft; cooling tower pump house - 35 ft; two cooling towers - 65 ft; and feedwater purity building - 58 ft. These are approximate heights above grade as the buildings would be seen from the west
20	2-57	23	Value "27,488" appears to be an error. "27,488" does not represent 39% of Van Buren County's 16,977 employed in 2002, as stated.
21	2-57	36-38	Appears that "Van Buren County" should be one of the two counties referenced (instead of both sets of figures being attributed to Berrien county).
22	2-58	25-27	Taxes are also paid to Lake Michigan College and the Michigan State Education Tax (See ER <sup>1</sup> p. 2-40)
23	2-58	34	According to Table 2-9, taxes paid to Covert Township averaged 58 percent of tax revenues. The word "spent" should be deleted from this sentence. (See DSEIS Table 2-9, p 2-60).
24	2-58	35	According to Table 2-9, taxes paid to Covert School District averaged 32 percent of total property taxes. (See DSEIS Table 2-9, p 2-60).
25	2-61	2	Suggest clarifying that there are no "known" historic & archaeological resources at the Palisades site.
26	2-63	10	Approximately 80 acres of the site are developed or maintained (See DSEIS p 2-4 line 29)
27	2-63	12-13	Replace existing sentence with, "Most of these facilities are located along the main and north access roads."
28	2-63	19	Suggest changing "former" to "pre-operational"
29	2-68	13	Change "Straminea" to "Pitcheri"
30	4-24	11	No "Table 2-10" exists; should be changed to "Table 2-9" (See DSEIS p. 2-60)
31	4-24	13	Taxes paid to Covert Township averaged 58 percent of tax revenues spent in the county (See DSEIS Table 2-9, p 2-60).
32	4-24	14	The Covert School District received an average of

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			\$2.7 million annually from Consumers over the 3-year period (See DSEIS Table 2-9, p 2-60).
33	4-24	21	VBCO & VBCISD received 3-5 percent of revenues from Consumers (See DSEIS Table 2-9, p. 2-60).
34	4-26	11 & 15	Suggest rewording "The applicant has stated that these procedures are in place ..." and replacing with "These procedures are in place..."
35	4-27	8	Change to "(1) no major..."
36	4-37	23	Line should read, "... Palisades' NPDES permit ..."
37	4-40	14	Suggest clarifying that Section 106 of the NHPA directs Federal agencies, and not the applicant, to contact Tribal Governments to take into account the effects of their undertakings on historic properties.
38	4-40	19	Suggest adding new sentence at end stating that NMC and Consumers have procedures in place to require evaluation for archaeological resources if land-disturbing activities are planned in previously undisturbed areas.
39	4-41	1	According to cited study, groundwater flow velocity is from the east-southeast to west-northwest at approximately 23 ft/yr. This would indicate a westward flow.
40	4-42	23-24	Suggest noting that NMC and Consumers have procedures in place to require evaluation for archaeological resources if land-disturbing activities are planned in previously undisturbed areas.
41	5-5	34	Change "its" to "it"
42	5-6	10	"CP 1996" is not in ER <sup>1</sup> reference list—remove reference here; "CP 1995" and "CP 1996" are not in DSEIS Chapter 5 reference list
43	5-8	11	% Contribution column does not add to 100%. Suggest adding footnote, "Figures may not add due to rounding."
44	5-9	32	"NRC 2004" is not in the Chapter 5 reference list. No reference is cited for NUREG/BR-0058. NMC 2005a is not in Chapter 5 reference list
45	5-9	29	Reference should be NRC 1997b, and reference should be added to Chapter 5 reference list.
46	5-10	1	"NRC 2004" is not in the Chapter 5 reference list. No reference is cited for NUREG/BR-0058.
47	5-10	27	NMC 2005a is not in the Chapter 5 reference list
48	5-10	36	NMC 2005b, NMC 2005c are not in the Chapter 5 reference list
49	8-4	6	There are no threatened or endangered aquatic species known at Palisades; suggest removing "including threatened and endangered species."

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			(See DSEIS page 2-32)
50	8-4	29	Palisades has three onsite sanitary drain fields (see DSEIS Figure 2-3)
51	8-5	28	"Covert County" should be either "Covert Township" or "Van Buren County"
52	8-7	17-31	Annual Energy Outlook 2006 is now available. Suggest updating paragraph to reflect latest information from DOE.
53	8-34	4-6	Suggest noting that the AP1000 design is now certified also. See NRC website for references
54	8-45	21	Wind class differs from wind class given on DSEIS p. 2-25 line 27
55	8-53 & 8-54	Heading	Table numbers should be Table 8-8
56	9-1	7	"NMC" should be replaced with "the plant owner"
57	E-3	8	The South Carolina Radioactive Waste License for Delivery was reissued for 2006. Authorization information is as follows: Number: 0006-21-06 Issue Date: 01/09/2006 Expiration Date: 12/31/2006
58	E-3	10	The Tennessee Radioactive Waste License for Delivery was reissued for 2006. Authorization information is as follows: Number: T-MI003-L06 Issue Date: 01/01/2006 Expiration Date: 12/31/2006
59	G-2	39	Change "is $1.0 \times 10^{-7}$ " to "is about $1.0 \times 10^{-7}$ ". Also change "NMC 2005a" to "NMC 2005b"
60	G-4	28	Column does not add to 100%. Suggest adding footnote, "Figures may not add due to rounding."