



Environmental Reviews and Evaluations

Title: Environmental Reviews and Evaluations

Procedure Owner:	Rick N. Buckley / Corporate Environmental Chairman	
	(Print Name / Title)	
Approved:	<i>Ricky N. Buckley</i>	04/04/06
	(Procedure Owner Signature)	(Date)

Effective Date	EN Common	<input checked="" type="checkbox"/>	04/10/06	Effective Date Exception	ANO		PNPS	
	ENN	<input type="checkbox"/>			ECH		RBS	
	ENS	<input type="checkbox"/>			GGNS		VY	
					IPEC		W3	
					JAF		WPO	

Procedure Contains NMM REFLIB Forms: YES  NO

**Basis Statement**

Rev. 4

This revision does not affect the intent of this procedure and is editorial only to:

- Change "greater than one acre" to "equal to or greater than one acre" to correct a typographical error (see Item 1 to Attachment 9.1).
- Clarify that undisturbed areas include "surface or sub-surface" soils (see Item 2 to Attachment 9.1).
- Add language to clarify that land disturbance activities at VY that are less than one acre may require evaluation due to a state-specific requirement (see Item 3 to Attachment 9.1).
- Clarified that Items 1 and 2 under the Environmental Screening Questions to Attachment 9.4 also apply to archaeological, historical or other cultural resources that may be inadvertently uncovered during excavation activities.

**Site and NMM Procedures Cancelled or Superseded By This Revision**

None

Process Applicability Exclusion (ENN-LI-100) / Programmatic Exclusion (ENS-LI-101)

All Sites:  Specific Sites: ANO  GGNS  IPEC  JAF  PNPS  RBS  VY  W3



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## 1.0 PURPOSE

Prescribes and establishes the nonradiological review and documentation process prior to engaging in additional construction or operational activities that may result in an environmental impact.

## 2.0 REFERENCES

### [1] Regulatory References

- (a) 10CFR51.22, "Criterion for Categorical Exclusion; Identification of Licensing and Regulatory Actions Eligible for Categorical Exclusion or Other Wise not Requiring Environmental Review." Specifically 10CFR51.22(c)(9).
- (b) NUREG-0575, Final Generic Environmental Impact Statement on Handling and Storage of Spent Light Water Power Reactor Fuel, 1979
- (c) NUREG-1092, Environmental Assessment for 10 CFR Part 72 "Licensing Requirements for the Independent Storage of Spent Fuel and High-Level Radioactive Waste," 1984
- (d) NUREG-1437, Generic Environmental Statement for License Renewal of Nuclear Power Plants, Final Report, May 1996 (and Addendum's)

### [2] Environmental Protection Agency References

- (a) Clean Air Act
- (b) Clean Water Act
- (c) Endangered Species Act (and amendments)
- (d) National Historic Preservation Act (and amendments)
- (e) Resource Conservation and Recovery Act

### [3] Entergy Nuclear References

- (a) NMM Procedure EN-LI-100, Process Applicability Determination
- (b) NMM Procedure EN-EV-117, Air Emissions Management Program

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[4] ANO References

- (a) Air Permit Number 0090-AR-3
- (b) ANO Unit 1 Final Environmental Statement, February 1973
- (c) ANO Units 1 and 2 Safety Analysis Report
- (d) Arkansas Nuclear One Stormwater Pollution Prevention Plan
- (e) Condition 2.E to ANO Unit 2 Operating License NPF-6
- (f) Environmental Assessment for Addition of the VSC to the List of Approved Casks in 10CFR72.214, 1993
- (g) Environmental Assessment for the Use of a General License for Dry Cask Storage per 10CFR72, Subpart K, 1989
- (h) NPDES Permit Number AR0001392
- (i) NUREG-0254, ANO Unit 2 Final Environmental Statement, June 1977
- (j) NUREG-1437, Supplement 3, Generic Environmental Statement for License Renewal of Nuclear Power Plants Regarding Arkansas Nuclear One, Unit 1
- (k) NUREG-1437, Supplement 19, Generic Environmental Statement for License Renewal of Nuclear Power Plants Regarding Arkansas Nuclear One, Unit 2
- (l) Procedure 1000.167, ANO Historical and Archaeological Preservation Program
- (m) Procedure 1052.030, ANO Spill Prevention Control and Countermeasure Plan
- (n) Section 404 Permit 00241-5
- (o) Supplementary Information - Licensing Requirements for the Independent Storage of Spent Nuclear Fuel and High-Level Radioactive Waste (51FR19106), 1986

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(p) Waste Confidence Decision (49FR34688), 1984

[5] GGNS References

- (a) Baseline Stormwater General NPDES Permit Number MSR000883
- (b) GGNS Environmental Protection Plan, Appendix B to Operating License NPF-29
- (c) GGNS Synthetic Minor Operating Permit 0420-00023
- (d) GGNS Updated Final Safety Analysis Report
- (e) Grand Gulf Nuclear Station Spill Prevention Control and Countermeasure Plan
- (f) Grand Gulf Nuclear Station Stormwater Pollution Prevention Plan
- (g) NPDES Permit Number MS0029521
- (h) NUREG-0777, GGNS Final Environmental Statement, September 1981

[6] IP2 References

- (a) Environmental Report, Indian Point Unit 2, August 1970
- (b) Final Environmental Statement Related to Operation of Indian Point Unit 2, September 1972
- (c) IP1, 2 and 3 SPDES Permit Number NY 0004472
- (d) IP2 Air Permit Number 3-5522-00011/00026
- (e) IP2 Chemical Bulk Storage Registration 3-000107
- (f) IP2 Environmental Protection Plan, Appendix B to Operating License DPR-26
- (g) IP2 Facility Response Plan
- (h) IP2 Hazardous Waste TSDF Permit NYD991304411
- (i) IP2 Major Oil Storage Facility License MOSF #3-2140

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- (j) IPEC Procedure SMM-EV-101, IPEC Spill /Release Response Plan
  - (k) IP2 Spill Prevention Control and Countermeasure Plan
  - (l) IP2 Updated Final Safety Analysis Report
  - (m) IP2 Vapor Extractor WCDOH Air Permit 52-5682
  - (n) IP2 WCDOH Boiler Permit 52-4493
  - (o) IP2 WCDOH GT 1 Air Permit #00021
  - (p) IP2 WCDOH GT 2 Air Permit #00022
  - (q) IP WCDOH GT 3 Air Permit #00023
  - (r) Buchanan GT SPDES Permit Number NY 022 4826
  - (s) Simulator Transformer Vault SPDES Permit NY 025 0414
  - (t) Tank Farm SPDES Permit NY 025 1135
- [7] IP3 References
- (a) Environmental Report, Indian Point Unit 3, June 1971 (and supplements)
  - (b) Final Environmental Statement Related to Operation of Indian Point Unit 3
  - (c) IP1, 2 and 3 SPDES Permit Number NY 0004472
  - (d) IP3 Air Permit Number 3-5522-00105/00009
  - (e) IP3 Chemical Bulk Storage Registration #3-000071
  - (f) IP3 Environmental Protection Plan, Appendix B to Operating License DPR-64
  - (g) IPEC Procedure SMM-EV-101, IPEC Spill/Release Plan
  - (h) IP3 Spill Prevention Control and Countermeasure Plan
  - (i) NUREG-75-002/003, IP3 Final Environmental Statement, February 1975



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- (j) IP3 Hazardous Waste TSDF Permit NYD085503746
- (k) IP3 Petroleum Bulk Storage Registration 3-166367
- (l) IP3 Updated Final Safety Analysis Report
- (m) IP3 WCDOH Boiler Permit # 52-6497
- (n) IP3 WCDOH Training Center Boiler Permit #52-6498
- (o) IP3 WCDOH Vapor Extractor Air Permit (awaiting issuance)

[8] JAF References

- (a) Certificate to Operate an Air Contamination Source 7-3556-00020/00012
- (b) Great Lakes Water Withdrawal Registration 4004
- (c) Hazardous Substance Bulk Storage Registration Certificate 7-000117
- (d) Final Environmental Statement Related to the Operation of James A. FitzPatrick Nuclear Power Plant, March 1973
- (e) JAF Procedure AP-09.03, Oil Spill Prevention Control and Countermeasure Plan
- (f) JAF Updated Final Safety Analysis Report
- (g) Industrial Waste Transporter and Disposal Permit 7A-041
- (h) Mixed Waste Storage Facility Permit NYD000765073
- (i) Pesticide Applicator Business Registration 79632
- (j) Petroleum Bulk Storage Registration Certificate 7-140600
- (k) Section 404 Permit 94-486-10
- (l) Sewage Sludge Transporter Permit 34-052
- (m) SPDES Permit NY-0020109

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[9] PNPS References

- (a) 50% Emission Cap Authorization
- (b) Groundwater Discharge Permit Number SE#2-389
- (c) NPDES Permit Number MA0003557
- (d) PNPS Final Environmental Statement Related to Operation of Pilgrim Nuclear Power Station, May 1972
- (e) PNPS Spill Prevention Control and Countermeasures Plan
- (f) PNPS Updated Final Safety Analysis Report
- (g) Section 404 Permit 199302464

[10] RBS References

- (a) Air Permit Number 3160-00009-03
- (b) LPDES Permit Number LA0042731
- (c) NUREG-1073, RBS Final Environmental Statement, January 1985
- (d) RBNP-035, Hazardous Materials Emergency Response
- (e) RBS Environmental Protection Plan, Appendix B to Operating License NPF-47
- (f) RBS Spill Prevention Control and Countermeasures Plan
- (g) RBS Updated Safety Analysis Report
- (h) Section 404 General Permit NOD-23

[11] VYNPS References

- (a) Air Contaminant Source Registration Certificate WM2335
- (b) Stormwater Discharge Permit 3415-9010

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- (c) Stormwater Discharge Permit 3653-9015
  - (d) Dredging Permit 200302129
  - (e) Final Environmental Statement Related to the Operation of Vermont Yankee Nuclear Power Corporation, July 1972
  - (f) Indirect Discharge Permit ID-9-0036-1A
  - (g) NPDES Permit 3-1199
  - (h) OP 2106, Oil and Hazardous Materials Spill Prevention and Control
  - (i) Public Water System Permit to Operate (COB Water System) 20559
  - (j) Solid Waste Management Facility Certification F9906-A1
  - (k) Stream Alteration Permit SA-1-0655
  - (l) Underground Storage Permit 806
  - (m) VY Updated Final Safety Analysis Report
  - (n) Water System Permit to Operate (Main Plant Water System) 8332
  - (o) Water System Permit to Operate (NEOB Water System) 20738
- [12] W3 References
- (a) Air Permit Number 2520-00091-00
  - (b) LPDES Permit Number LA0007374
  - (c) NUREG-0779, W3 Final Environmental Statement
  - (d) W3 Cultural Resources Protection Plan
  - (e) W3 Environmental Protection Plan, Appendix B to Operating License NPF-38
  - (f) W3 Final Safety Analysis Report

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- (g) W3 Spill Prevention Control and Countermeasures Plan
- (h) W3 Stormwater Pollution Prevention Plan

### 3.0 DEFINITIONS

- [1] Environmental Evaluation – Written nonradiological environmental evaluation on the impact of a proposed activity for which an environmental review concluded that an evaluation is required in order to determine if an unreviewed environmental question is involved.
- [2] Environmental Review (ER) – Process of determining whether a proposed activity:
  - Is regulated by state or federal (other than NRC) regulatory agencies.
  - Is within existing environmental reviews (i.e., FES).
  - Represents an unreviewed environmental question.
- [3] Significant Adverse Environmental Impact – Environmental effects that are clearly noticeable and are sufficient to destabilize important attributes of the environment.
- [4] Unreviewed Environmental Question - An unreviewed environmental question exists, if the proposed change, test, or experiment involves a: [P-29140, P-29141 & P-29142]
  - Matter which may result in a significant increase in any adverse environmental impact previously evaluated in the sites Final Environmental Statement.
  - Matter not previously reviewed and evaluated in the sites Final Environmental Statement but which may have a significant adverse environmental impact.



#### 4.0 RESPONSIBILITIES

- [1] Environmental Department Lead or Designee is responsible for:
  - (a) Performing environmental reviews of proposed changes, tests or experiments in accordance with this procedure.
  - (b) Performing environmental evaluations of proposed changes, tests or experiments that involve an unreviewed environmental question.
  - (c) Ensuring that reviews and evaluations are placed in plant records in accordance with site procedures.
- [2] Contractors are responsible for complying with Section 5.2 of this procedure.
- [3] Each Site's Nuclear Safety Assurance Department is responsible for obtaining NRC review and approval prior to the implementation of an activity that involves an unreviewed environmental question.
- [4] EN Personnel are responsible for complying with Section 5.2 of this procedure.
- [5] Environmental Focus Group is responsible for maintaining this procedure.

#### 5.0 DETAILS

##### 5.1 PRECAUTIONS AND LIMITATIONS

None

##### 5.2 SITE ACTIVITY REVIEWS

#### NOTE

Activities already reviewed in accordance with the procedures identified in the Section 2.0[3] references, site engineering reviews, or other site administrative procedures which are determined not to have an environmental impact are not subject to Section 5.2 of this procedure.

- [1] For those activities listed In Attachment 9.1 to this procedure, contractors and site personnel must complete Attachment 9.1 and obtain approval from the site environmental department lead PRIOR to conducting the activity.

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- [2] Contractors and site personnel may refer to Attachment 9.4 of this procedure for a description of the environmental screening regulatory basis for the activities listed in Attachment 9.1.

5.3 QUALIFICATION OF REVIEWERS AND EVALUATORS

- [1] Only personnel that are familiar with this procedure and the references identified in Sections 2.0[1] – 2.0[12], as applicable, are qualified to perform environmental reviews and evaluations.
- [2] Signature on environmental review or evaluation forms indicates that personnel are familiar with this procedure and the references identified in Sections 2.0[1] – 2.0[12], as applicable, and are qualified to perform environmental reviews and evaluations.

5.4 ENVIRONMENTAL REVIEWS [P-5452, P-5454, P-5456, P-29138 & P-32396]

**NOTE**

Only Sections 5.4[1] and 5.4[2] below of this procedure are applicable to JAF, PNPS and VYNPS since these facilities do not have an Appendix B (Environmental Protection Plan) to their operating license.

- [1] Upon receiving a Process Applicability Determination Form described in NMM Procedure EN-LI-100 or a Site Activity Review Form described in Section 5.2 of this procedure, the site environmental department lead must THEN complete the Environmental Review Form shown in Attachment 9.2.
- [2] IF the proposed activity is within the scope (i.e., is covered by or could be covered through a modification, revision or approval) of a reference(s) listed in Section 2.0 of this procedure, no unreviewed environmental question exists, and the site environmental department lead must THEN:
  - (a) Provide a copy of the Environmental Review Form (Attachment 9.2) to the originating department.
  - (b) Ensure that a copy of the Process Applicability Determination Form or Site Activity Review Form, as applicable, and the Environmental Review Form are placed in plant records in accordance with site procedures.

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- [3] IF the proposed activity is not within the scope (i.e., is not covered by or could not be covered through a modification, revision or approval) of a reference(s) listed in Section 2.0 of this procedure, a potential unreviewed environmental question exists, and the site environmental department lead must THEN complete the Environmental Evaluation Form shown in Attachment 9.3.
- [4] IF no significant adverse environmental impacts as described in Section 3.0[3] will occur as a result of the activity upon completion of the Environmental Evaluation Form, THEN the site environmental department lead must:
- (a) Provide a copy of the Environmental Review Form (Attachment 9.2) to the originating department.
  - (b) Maintain on file a copy of the Process Applicability Determination Form or Site Activity Review Form, as applicable, Environmental Review Form, and Environmental Evaluation Form.
- [5] IF a significant adverse environmental impact as described in Section 3.0[3] will occur as a result of the activity upon completion of the Environmental Evaluation Form, THEN the site environmental department lead must:
- (a) Notify the originating department that NRC approval must be obtained prior to implementation.
  - (b) Unless otherwise specified by the originating department, forward the completed Environmental Evaluation Form shown in Attachment 9.3 to NSA.
  - (c) Ensure that a copy of the Process Applicability Determination Form or Site Activity Review Form, as applicable, Environmental Review Form and Environmental Evaluation Form are placed in plant records in accordance with site procedures.

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5.5 NRC SUBMITTAL OF EVALUATIONS [P-29139 & P-29143]

**NOTE**

Section 5.5 of this procedure is not applicable to JAF, PNPS and VYNPS since these sites do not have an Appendix B (Environmental Protection Plan) to their operating license.

- [1] NSA, upon receiving an Environmental Evaluation Form involving an unreviewed environmental question, must THEN:
- (a) Submit the environmental evaluation to the NRC for review and approval in accordance with department procedures.
  - (b) Notify the site environmental department lead upon receipt of NRC approval/disapproval.

6.0 **INTERFACES**

- [1] NMM EN-LI-100, Process Applicability Determination

7.0 **RECORDS**

- [1] Quality Records
- (a) Environmental Evaluation Form
- [2] Non-Quality Records
- (a) Environmental Review Form

8.0 **OBLIGATION AND REGULATORY COMMITMENT CROSS-REFERENCES**

8.1 OBLIGATIONS AND COMMITMENTS IMPLEMENTED OVERALL

None

8.2 SECTION SPECIFIC OBLIGATIONS AND COMMITMENTS

None



### 8.3 SITE SPECIFIC COMMITMENTS

Step	Site	Document	Commitment Number or Reference
[1]	GGNS	EPP Section 3.1	P-29138 & P-32396
[2]	GGNS	EPP Section 3.1	P-29139 & P-29143
[3]	GGNS	EPP Section 3.1	P-29140, P-29141 & P-29142
[4]	W3	EPP Section 3.1	P-5452, P-5454 & P-5456

### 9.0 ATTACHMENTS

- 9.1 Site Activity Review Form (Typical)
- 9.2 Environmental Review Form (Typical)
- 9.3 Environmental Evaluation Form (Typical)
- 9.4 Environmental Screening Regulatory Basis

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**ATTACHMENT 9.1**  
**SHEET 1 of 1**

**SITE ACTIVITY REVIEW FORM (TYPICAL)**

**Check Appropriate Box(es) for Activity Being Performed:**  
**(Attachment 9.4 provides a brief description of the screening regulatory basis for the activities listed below.)**

- |     |                          |   |
|-----|--------------------------|---|
| 1.  | <input type="checkbox"/> | Land disturbance equal to or greater than one acre (i.e., grading activities, construction of buildings, excavations, reforestation, creation or removal of ponds).                                 |
| 2.  | <input type="checkbox"/> | Any land disturbance of undisturbed surface or subsurface land areas (i.e., grading activities, construction, excavations, reforestation, creating, or removing ponds).                             |
| 3.  | <input type="checkbox"/> | For Vermont Yankee only, land disturbance involving previously disturbed land that is less than one acre.   |
| 4.  | <input type="checkbox"/> | Dredging activities in a lake, river, pond, ditches or stream.  |
| 5.  | <input type="checkbox"/> | Changing the amount of thermal heat being discharged to the river or lake (i.e., associated with once through and closed cycle cooling wastewater discharges).                                      |
| 6.  | <input type="checkbox"/> | Changing the concentration or quantity of chemicals being discharged to the river, lake, or air (i.e., associated with wastewater and air emission discharges).                                     |
| 7.  | <input type="checkbox"/> | Discharging new or different chemicals that are currently not authorized for use by the state regulatory agency (i.e., associated with wastewater discharges).                                      |
| 8.  | <input type="checkbox"/> | Changing the design or operation of the intake or discharge structures (i.e., increase water withdrawal flow at intake structure or discharge flow at discharge structure).                         |
| 9.  | <input type="checkbox"/> | Modifying the design or operation of the cooling tower that will change water or air flow characteristics.  |
| 10. | <input type="checkbox"/> | Modifying the design or operation of the plant that will change the path of an existing water discharge or that will result in a new water discharge (i.e., associated with wastewater discharges). |
| 11. | <input type="checkbox"/> | Modifying existing stationary fuel burning equipment that could potentially result in an increase of air emissions (i.e., diesel fuel oil, butane, gasoline, propane, and kerosene).                |
| 12. | <input type="checkbox"/> | Installing or removing stationary fuel burning equipment or using portable fuel burning equipment (i.e., diesel fuel oil, butane, gasoline, propane, and kerosene).                                 |
| 13. | <input type="checkbox"/> | Installing or using equipment that will result in an air emission discharge (i.e., ozone, VOC, particulates, sulfur dioxide, carbon monoxide, nitrogen oxide).                                      |
| 14. | <input type="checkbox"/> | Installing or modifying a stationary or mobile tank (i.e., fuel oil, gasoline, kerosene, propane, butane, sulfuric acid).   |
| 15. | <input type="checkbox"/> | Using or storing oils or chemicals in containers $\geq 55$ gallons that could be directly released into the environment.  |
| 16. | <input type="checkbox"/> | Burying or placing any solid wastes in the site area that may affect runoff, surface water, or groundwater.   |
| 17. | <input type="checkbox"/> | Generates a new hazardous waste stream or increases an existing hazardous waste stream.   |

**Prepared By:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Approved By:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**NOTE:** Completed form must be reviewed and approved by site environmental department lead prior to starting the activity.

**ATTACHMENT 9.2**  
**SHEET 1 of 1**

**ENVIRONMENTAL REVIEW FORM (TYPICAL)**

1. Facility: \_\_\_\_\_
  2. Document Number: \_\_\_\_\_
  3. ER Number: \_\_\_\_\_
  4. Activity Reviewed: \_\_\_\_\_
- \_\_\_\_\_
5. Complete Screening Below (as applicable to each site):

Reference	Within Scope	Modification/Revision/ Approval Needed
Section 2.0[1] References	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Section 2.0[2] References	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Section 2.0[4] References (ANO)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
Section 2.0[5] References (GGNS)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
Section 2.0[6] References (IP2)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
Section 2.0[7] References (IP3)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
Section 2.0[8] References (JAF)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
Section 2.0[9] References (PNPS)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
Section 2.0[10] References (RBS)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
Section 2.0[11] References (VYNPS)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
Section 2.0[12] References (W3)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No

6. If within scope, attach cited reference(s) and appropriate section(s) along with a brief discussion:
7. If a modification, revision or approval is needed, attach a brief discussion:
8. Prepared By: \_\_\_\_\_ Date: \_\_\_\_\_

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ATTACHMENT 9.3

ENVIRONMENTAL EVALUATION FORM (TYPICAL)

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1. Document Evaluated:				
2. Description of proposed change (attach additional sheets if needed):				
3. Analysis of environmental impact (attach additional sheets if needed):				
4. If applicable, alternatives for reducing environmental impact (attach additional sheets if needed):				
5. Summary of basis for conclusions (attach additional sheets if needed):				
6. Significant Adverse Environmental Impact Exists: <input type="checkbox"/> Yes <input type="checkbox"/> No				
7. References: (attach additional sheets if needed):				
TOT. PGS	PREPARER	DATE	REVIEWER	DATE

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**Environmental Screening Regulatory Basis:**

For sites that implement an Environmental Protection Plan (EPP), it states that the licensee may make changes in station design or operation or perform tests or experiments affecting the environment, provided such activities do not involve an unreviewed environmental question and do not involve a change in the EPP. For ANO, these requirements are described in Condition 2.E to the Unit 2 Operating License.

Changes in plant design or operation or performance of tests or experiments which do not affect the environment are not subject to the requirements of the respective EPP or the ANO Unit 2 Operating License. *However, these changes are still subject to other federal and state regulatory requirements and must be evaluated.*

Before engaging in construction or operation activities which may significantly affect the environment, the licensee shall prepare and record an environmental evaluation of such activity. Although activities are excluded from EPP requirements (or the ANO-2 Operating License 2.E requirement) if all measurable nonradiological effects are confined to the onsite areas previously disturbed during site preparation and plant construction, *other federal and state regulatory requirements still apply.* When the evaluation indicates that such activity involves an unreviewed environmental question, the licensee shall provide a written evaluation of such activity and obtain prior NRC approval. When such activity involves a change in the EPP or the ANO-2 Operating License, such activity and change may be implemented only in accordance with an appropriate license amendment.

The environmental screening fulfills two main purposes:

1. Ensure that no unreviewed environmental question exists as set forth by EPP requirements, and
2. To ensure that activities that may require approvals or permitting activities regulated by the state or federal environmental permitting authority receive due consideration and action, as appropriate.

Each of the environmental screening questions and the regulatory basis for them are provided below.

**Environmental Screening Questions:**

Will the proposed change being evaluated involve or include.

1. Land disturbance equal to or greater than one acre (i.e., grading activities, construction of buildings, excavations, reforestation, creation or removal of ponds).
  - In accordance with the Clean Water Act, a Construction Stormwater Permit is required for those activities that disturb one acre or greater in order to manage:
    - ★ Sediment runoff and erosion.
    - ★ Potential leakage from oil and chemical containers.
    - ★ Potential leakage from vehicles and equipment.

A construction stormwater permit is not required for silvicultural activities. However, best management practices must be followed and consideration given to historical locations or endangered species.



- In accordance with the National Historic Preservation Act, any cultural resources in the area must not be disturbed until prior authorization is obtained from the State Historic Preservation Office, and if applicable, the NRC as set forth in the site's Cultural Resource Protection Plan. This would also apply to archaeological, historical or other cultural resources that may be inadvertently uncovered during excavation activities.
2. Any land disturbance of undisturbed surface or sub-surface land areas (i.e., grading activities, construction, excavations, reforestation, creating, or removing ponds).
- In accordance with the National Historic Preservation Act, any cultural resources in the area must not be disturbed until prior authorization is obtained from the State Historic Preservation Office, and if applicable, the NRC as set forth in the site's Cultural Resource Protection Plan. This would also apply to archaeological, historical or other cultural resources that may be inadvertently uncovered during excavation activities.
  - In accordance with the Clean Water Act, a Construction Stormwater Permit is required for those activities that disturb one acre or greater in order to manage:
    - ★ Sediment runoff and erosion.
    - ★ Potential leakage from oil and chemical containers.
    - ★ Potential leakage from vehicles and equipment.
- A construction stormwater permit is not required for silvicultural activities. However, best management practices must be followed and consideration given to historical locations or endangered species.
- An activity is excluded from EPP review requirements if all measurable nonradiological effects are confined to the on-site areas previously disturbed during site preparation and plant construction.
3. For Vermont Yankee only, land disturbance involving previously disturbed land that is less than one acre.
- In accordance with the Vermont Department of Environmental Conservation stormwater management regulations, a Permit may be required to discharge treated stormwater:
4. Dredging activities in a lake, river, pond, ditches or stream.
- In accordance with the Clean Water Act, a Section 404 Permit is required:
    - ★ For removal of material from a lake, river, pond, ditch or stream.
    - ★ For disturbing any material in a lake, river, pond, ditch or stream.
    - ★ For disturbing areas designated as wetlands.
5. Changing the amount of thermal heat being discharged to the river or lake (i.e., associated with once through and closed cycle cooling wastewater discharges).
- In accordance with the Clean Water Act, any temperature increase in once through or closed cycle cooling water discharges that would exceed the established limits set in the LPDES/NPDES/SPDES Permit would have to be approved by the regulatory agency and the Permit modified accordingly.



6. Changing the concentration or quantity of chemicals being discharged to the river, lake, or air (i.e., associated with wastewater and air emission discharges).
  - In accordance with the Clean Water Act, increasing the concentration or quantity of a chemical in a wastewater discharge that had already been previously established and defined in a LPDES/NPDES/SPDES Permit application would have to be approved by the regulatory agency prior to the change.
  - In accordance with the Clean Air Act, if air emissions from a source increases in pounds/hour or tons/year from that specified in the site Air Permit or Air Permit application as a result of increasing the concentration or quantity of a chemical, regulatory approval would have to be obtained and the site Air Permit potentially modified.
7. Discharging new or different chemicals that are currently not authorized for use by the state regulatory agency (i.e., associated with wastewater discharges).
  - In accordance with the Clean Water Act, utilizing new or different chemicals that had not been previously defined in a LPDES/NPDES Permit application and that are associated with wastewater discharges would have to be approved by the regulatory agency prior to utilizing the chemical.
8. Changing the design or operation of the intake or discharge structures (i.e., increase water withdrawal flow at intake structure or discharge flow at discharge structure).
  - In accordance with the Clean Water Act, any change in the design that would increase the flow of water at the intake or discharge structures from that previously specified in the LPDES/NPDES application would have to be approved by the state regulatory agency.
9. Modifying the design or operation of the cooling tower that will change water or air flow characteristics.
  - In accordance with the Clean Air Act, if air emissions from a source increases in pounds/hour or tons/year from that specified in the site Air Permit or Air Permit application as a result of modifying the design or operation of the cooling tower, regulatory approval would have to be obtained and the site Air Permit potentially modified.
  - In accordance with the Clean Water Act, any change in the design of the cooling tower that would increase the flow of water being discharged from that previously specified in the LPDES/NPDES application would have to be approved by the state regulatory agency.
10. Modifying the design or operation of the plant that will change the path of an existing water discharge or that will result in a new water discharge (i.e., associated with wastewater discharges).
  - In accordance with the Clean Water Act, changing the path of an existing wastewater discharge or creating a new wastewater discharge that had not been previously defined in a LPDES/NPDES Permit application would have to be approved by the regulatory agency and the Permit modified accordingly.
  - For changes to the site's sanitary sewage system, the introduction of a new source of wastewater that will discharge into a municipal sewage treatment system may require approval from the county or parish sanitarian.

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**ENVIRONMENTAL SCREENING REGULATORY BASIS**

11. Modifying existing stationary fuel burning equipment that could potentially result in an increase of air emissions (i.e., diesel fuel oil, butane, gasoline, propane, and kerosene).
  - In accordance with the Clean Air Act, if air emissions from a source increases in pounds/hour or tons/year from that specified in the site Air Permit or Air Permit application as a result of modifying the fuel burning equipment, regulatory approval would have to be obtained and the site Air Permit modified.
12. Installing or removing stationary fuel burning equipment or using portable fuel burning equipment (i.e., diesel fuel oil, butane, gasoline, propane and kerosene).
  - In accordance with the Clean Air Act, installing stationary fuel burning equipment or bringing portable fuel equipment on-site classified as emission sources that are not listed in the Site Air Permit and that had not been previously defined in the Air Permit application would have to be approved by the regulatory agency and the Permit potentially modified prior to bringing the equipment on-site.
  - In accordance with the Clean Water Act and the sites Spill Prevention, Control and Countermeasures (SPCC) Plan, spill prevention measures have to be established for portable diesel fuel oil, gasoline or kerosene burning equipment and listed in the SPCC Plan if the portable equipment remains permanently.
13. Installing or using equipment that will result in an air emission discharge (i.e., ozone, VOC, particulates, sulfur dioxide, carbon monoxide, nitrogen oxide).
  - In accordance with the Clean Air Act, installing or using equipment that would result in the emission of a regulated air pollutant that is not listed in the Site Air Permit and that had not been previously defined in the Air Permit application would have to be approved by the regulatory agency and the Permit potentially modified prior to bringing the equipment on-site.
14. Installing or modifying a stationary or mobile tank (i.e., fuel oil, gasoline, kerosene, propane, butane, sulfuric acid).
  - In accordance with the Clean Air Act, if air emissions from a source increases in pounds/hour or tons/year from that specified in the site Air Permit or the Air Permit application as a result of installing or modifying a stationary or mobile tank, regulatory approval would have to be obtained and the site Air Permit potentially modified.
  - In an accordance with the Clean Water Act:
    - ★ Stationary diesel fuel oil, gasoline or kerosene tanks are required to have containment/diversionary structures and be listed in the sites Spill Prevention, Control and Countermeasures (SPCC) Plan.
    - ★ Spill prevention measures have to be established for mobile diesel fuel oil, gasoline or kerosene tanks while on-site and listed in the SPCC Plan if the mobile tank remains permanently.
    - ★ State of Louisiana requires that chemical containers ≥55 gallons be listed in the sites SPCC Plan and that containment/diversionary structures be established.

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- ★ State of Arkansas and Mississippi require that containers of chemicals and oils be included in the sites Stormwater Pollution Prevention Plan as potential stormwater runoff pollutant sources and that containment/diversionary structures be established.
15. Using or storing oils or chemicals in containers  $\geq 55$  gallons that could be directly released into the environment.
- In accordance with the Clean Water Act:
    - ★ Containers containing oils that are  $\geq 55$  gallons in capacity are required to be listed in the sites Spill Prevention, Control and Countermeasures Plan and containment/diversionary structures established.
    - ★ State of Louisiana requires that chemical containers  $\geq 55$  gallons be listed in the sites Spill Prevention, Control and Countermeasures Plan and containment/diversionary structures established.
    - ★ State of Arkansas and Mississippi require that containers of chemicals and oils be included in the sites Stormwater Pollution Prevention Plan as potential stormwater runoff pollutant sources and containment/diversionary structures established.
16. Burying or placing any solid wastes in the site area that may affect runoff, surface water, or groundwater.
- In accordance with the Resource Conservation and Recovery Act, solid waste disposal permits are required to be obtained from the regulatory agency prior to burial of any material on-site.
  - In accordance with the Clean Water Act:
    - ★ Housekeeping measures must be established to minimize the potential of pollutants entering stormwater runoff.
    - ★ State of Arkansas and Mississippi require that areas that could be potential stormwater runoff pollutant source be listed in the sites Stormwater Pollution Prevention Plan.
  - The construction of a surface impoundment or pond will require a permit from the state or federal environmental permitting authority.
17. Generates a new hazardous waste stream or increases an existing hazardous waste stream.
- In accordance with the Resource Conservation and Recovery Act and/or state-specific hazardous waste management requirements:
    - ★ Hazardous waste streams must be properly managed and accumulated.
    - ★ Hazardous waste streams must be characterized and profiled prior to sending off-site for disposal.
    - ★ Facilities are required to notify the regulatory agency should generator classification change due to an increase in hazardous waste generation.