



RULES AND DIRECTIVES
BRANCH
USNRC

Entergy Nuclear Operations, Inc.
Vermont Yankee
P.O. Box 0500
185 Old Ferry Road
Brattleboro, VT 05302-0500
Tel 802 257 5271

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March 7, 2007
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BVY 07-012
TAC No. MC 9670

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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71FR 76706

27

- Reference:
1. Letter, Entergy to USNRC, "Vermont Yankee Nuclear Power Station, License No. DPR-28, License Renewal Application," BVY 06-009, dated January 25, 2006.
 2. Letter, USNRC to Entergy, "Notice of Availability of the Draft Plant-Specific Supplement 30 to the Generic Environmental Impact Statement for License Renewal of Nuclear Plants Regarding Vermont Yankee Nuclear Power Station", NVY 06-174, dated December 13, 2006.

**Subject: Vermont Yankee Nuclear Power Station
License No. DPR-28 (Docket No. 50-271)
License Renewal Application, Amendment 25**

On January 25, 2006, Entergy Nuclear Operations, Inc. and Entergy Nuclear Vermont Yankee, LLC (Entergy) submitted the License Renewal Application (LRA) for the Vermont Yankee Nuclear Power Station (VYNPS) as indicated by Reference 1. On December 13, 2006, the NRC published the Draft Plant-Specific Supplement 30 to the Generic Environmental Impact Statement for VYNPS as indicated by Reference 2. This letter contains one attachment to provide a list of comments to the NRC developed during Entergy's review of Supplement 30.

This letter contains no regulatory commitments.

Should you have any questions concerning this letter, please contact Mr. Dave Mannai at (802) 451-3304.

I declare under penalty of perjury that the foregoing is true and correct, executed on March 7, 2007.

Sincerely,

Ted A. Sullivan
Site Vice President
Vermont Yankee Nuclear Power Station

cc: See next page

SONSI Review Complete
Template = ADM-013

ERIDS = ADM-03
Add = R. C. Cusack
(RLE)

cc: Mr. James Dyer, Director
U.S. Nuclear Regulatory Commission
Office O5E7
Washington, DC 20555-00001

Mr. Samuel J. Collins, Regional Administrator
U.S. Nuclear Regulatory Commission, Region 1
475 Allendale Road
King of Prussia, PA 19406-1415

Mr. Jack Strosnider, Director
U.S. Nuclear Regulatory Commission
Office T8A23
Washington, DC 20555-00001

Mr. Jonathan Rowley, Senior Project Manager
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
MS-O-11F1
Rockville, MD 20853

Mr. Richard Emch
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
MS-O-11F1
Rockville, MD 20853

Mr. James S. Kim, Project Manager
U.S. Nuclear Regulatory Commission
Mail Stop O 8 C2A
Washington, DC 20555

USNRC Resident Inspector
Entergy Nuclear Vermont Yankee, LLC
P.O. Box 157 (*for mail delivery*)
Vernon, Vermont 05354

Mr. David O'Brien, Commissioner
VT Department of Public Service
112 State Street – Drawer 20
Montpelier, Vermont 05620-2601

Diane Curran, Esq.
Harmon, Curran, Spielberg & Eisenberg, LLP
1726 M Street, N.W., Suite 600
Washington, D.C. 20036

Attachment 1

Vermont Yankee Nuclear Power Station

License Renewal Application Supplement

Amendment 25

VYNPS Draft Site Environmental Impact Statement Review Comments

**Vermont Yankee Nuclear Power Station
Draft SEIS Comments
Attachment 1**

Number	Page	Line Number(s)	Comment
1	iii & iv	36 – 38 & 1	<p>“The Phase II Rule requires a permittee to submit substantial information regarding the operation of its intake structure and the interaction of the intake structure and the aquatic ecosystem. The permittee then develops a plan for compliance with the Rule’s national performance standards, which may include operational modifications or the installation of additional technology for organism protection. Therefore, would recommend revising the sentence; “However, under the provisions of the Clean Water Act 316(b) Phase II regulations, the Vermont Department of Environmental Conservation may impose further restrictions or require modifications to the cooling system to reduce the impacts on aquatic resources from entrainment and impingement”.</p> <p>Revise to read as follows; “However, under the provisions of the Clean Water Act 316(b) Phase II regulations, one or a combination of compliance measures specified in the regulations may be implemented at VYNPS, if needed, in coordination with the Vermont Department of Environmental Conservation to meet the numerical performance standards outlined in the Phase II regulations, thereby ultimately reducing entrainment and impingement from plant operations even further.”</p>
2	xix	12 - 15	<p>“The Phase II Rule requires a permittee to submit substantial information regarding the operation of its intake structure and the interaction of the intake structure and the aquatic ecosystem. The permittee then develops a plan for compliance with the Rule’s national performance standards, which may include operational modifications or the installation of additional technology for organism protection. Therefore, would recommend revising the sentence; “However, under the provisions of the Clean Water Act 316(b) Phase II regulations, the Vermont Department of Environmental Conservation may impose further restrictions or require modifications to the cooling system to reduce the impacts on aquatic resources from entrainment and impingement”.</p> <p>Revise to read as follows; “However, under the provisions of the Clean Water Act 316(b) Phase II regulations, one or a combination of compliance measures specified in the regulations may be implemented at VYNPS, if needed, in coordination with the Vermont Department of Environmental Conservation to meet the numerical performance standards outlined in the Phase II regulations, thereby ultimately reducing entrainment and impingement from plant operations even further.”</p>

**Vermont Yankee Nuclear Power Station
Draft SEIS Comments
Attachment 1**

Number	Page	Line Number(s)	Comment
3	1-2	32	Change "Table E-1" to "Table E-2" to accurately reflect the table in Appendix E.
4	1-4	39 - 40	The sentence; "The NRC staff has identified a new issue that was not previously addressed in the GEIS related to essential fish habitat (EFH)" should be deleted since the EFH consultation and associated EFH assessment has already been identified by the NRC as being necessary in previous industry SEIS's. Therefore, it is not "new information".
5	2-1	17	Delete "larger" to correct a typographical error.
6	2-8	42	Change "(Entergy 2006j)" to "(Entergy 2006h)" to accurately reflect the reference source in the Section 2.3 references of the Draft SEIS.
7	2-15	30	Change "pulled out" to "removed".
8	2-20	20	Change "(Entergy 2006b)" to "(Entergy 2006a)" to accurately reflect the reference source in the Section 2.3 references of the Draft SEIS.
9	2-36	24	Change "station" to "Station" to correct a typographical error.
10	2-36	25	Change "station" to "Station" to correct a typographical error.
11	2-43	28	Delete "or oil from any offsite source" since VYNPS does not receive used oil from any offsite source.
12	2-52	33	Insert "River" between "Connecticut" and "Atlantic" to correct a typographical error.
13	2-52	34	There is no "FWS 2005d" listing in the Section 2.3 references of the Draft SEIS.
14	2-53	5	Change "Salmon" to "States" to correct a typographical error.
15	2-53	35	Change "(Table 2-5)" to "(Table 2-9)" to accurately reflect table showing Blueback Herring counted.
16	2-60	3 - 4	Change "on the VYNPS site" to "near the VYNPS site" since eagles have not been seen roosting on site property and there are no large trees on the VYNPS property.
17	2-66	11	Insert a space between "of" and "other" to correct a typographical error.
18	2-70	2	Delete "of" prior to "0.0063" to correct a typographical error.
19	2-76	11	There is no "USDA 2006" listing <u>only</u> in the Section 2.3 references of the Draft SEIS. Section 2.3 references list "USDA 2006a, USDA 2006b and USDA 2006c".
20	2-85	N/A	Add "10 CFR Part 51. Code of Federal Regulations, Title 10, <i>Energy</i> , Part 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions" to the Section 2.3 references since it is in the section write-up and is consistent with other regulations listed in this section.

**Vermont Yankee Nuclear Power Station
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Number	Page	Line Number(s)	Comment
21	2-85	N/A	Add "40 CFR Part 70. Code of Federal Regulations, Title 40, <i>Protection of Environment</i> , Part 70, "State Operating Permit Programs" to the Section 2.3 references since it is in the section write-up and is consistent with other regulations listed in this section.
22	2-85	N/A	Add "Clean Air Act of 1970, as amended (CAA) 42 USC 7401, <i>et seq.</i> " to the Section 2.3 references since it is in the section write-up and is consistent with other Acts listed in this section.
23	2-85	N/A	Add "National Environmental Policy Act of 1969, as amended (NEPA) 42 USC 4321, <i>et seq.</i> " to the Section 2.3 references since it is in the section write-up and is consistent with other Acts listed in this section.
24	2-88	7 – 8	There is no "DeWald 2006b" reference listing in the Section 2.0 write-up (Pages 2-1 through 2-85).
25	2-88	13 - 15	There is no "DeWald 2006d" reference listing in the Section 2.0 write-up (Pages 2-1 through 2-85).
26	2-89	31 – 33	There is no "Entergy 2005f" reference listing in the Section 2.0 write-up (Pages 2-1 through 2-85).
27	2-90	38 – 39	There is no "Entergy 2006k" reference listing in the Section 2.0 write-up (Pages 2-1 through 2-85).
28	2-92	31	Insert "Division" between "Massachusetts" and "of" to correct a typographical error.
29	2-93	17 - 19	There is no "NCDC 2006a" reference listing in the Section 2.0 write-up (Pages 2-1 through 2-85).
30	2-96	38 - 39	There is no "USDA 2006a" reference listing in the Section 2.0 write-up (Pages 2-1 through 2-85).
31	2-97	9 - 11	There is no "EPA 2006a" reference listing in the Section 2.0 write-up (Pages 2-1 through 2-85).
32	2-97	37 - 40	There is no "FWS 2001" reference listing in the Section 2.0 write-up (Pages 2-1 through 2-85).
33	2-100	24 - 27	There is no "VDEC 2005b" reference listing in the Section 2.0 write-up (Pages 2-1 through 2-85).
34	2-100 2-101	41 – 42 1 - 2	There is no "VDEC 2006c" reference listing in the Section 2.0 write-up (Pages 2-1 through 2-85).
35	2-101	4 - 6	There is no "VDEC 2006d" reference listing in the Section 2.0 write-up (Pages 2-1 through 2-85).
36	4-14	16	Change "Normandeau 2004" to "Normandeau 2004a" to accurately reflect the reference source in the Section 4.10 references of the Draft SEIS.

**Vermont Yankee Nuclear Power Station
Draft SEIS Comments
Attachment 1**

Number	Page	Line Number(s)	Comment
37	4-14 4-15	38 – 41 1 - 3	<p>"The Phase II Rule requires a permittee to submit substantial information regarding the operation of its intake structure and the interaction of the intake structure and the aquatic ecosystem. The permittee then develops a plan for compliance with the Rule's national performance standards, which may include operational modifications or the installation of additional technology for organism protection.</p> <p>Therefore, would recommend revising the sentences, starting with "As part of the NPDES renewal....." on Page 4-14 and going through "during the license renewal period" on Page 4-15 to read as follows: "As part of the NPDES renewal, licensees may implement one or a combination of compliance alternatives, in coordination with the permitting agency, to meet the performance standards outlined in the 316(b) regulations. The new performance standards are designed to reduce entrainment losses due to water withdrawals associated with cooling water intake structures used for power production. Any additional site-specific measures implemented as a result of the 316(b) Phase II reviews at VYNPS would result in a reduction of entrainment during the license renewal period."</p>
38	4-15	39	<p>Insert a space between "salmon" and "(Salmo" to correct a typographical error.</p>
39	4-17	19 - 21	<p>"The Phase II Rule requires a permittee to submit substantial information regarding the operation of its intake structure and the interaction of the intake structure and the aquatic ecosystem. The permittee then develops a plan for compliance with the Rule's national performance standards, which may include operational modifications or the installation of additional technology for organism protection.</p> <p>Therefore, would recommend revising the sentence; "However, under the provisions of the Clean Water Act 316(b) Phase II regulations, the VDEC may impose further restrictions or require modifications to the cooling system to reduce the impacts of entrainment".</p> <p>Revise to read as follows; "However, under the provisions of the Clean Water Act 316(b) Phase II regulations, VYNPS may implement additional measures, if needed, in coordination with the VDEC to meet the numerical performance standards outlined in the regulations, thereby ultimately reducing entrainment from plant operations even further."</p>
40	4-18	1 - 4	<p>Revise sentence to read as follows: "The new performance standards are designed to reduce impingement losses resulting from plant operation. Any site-specific measures implemented, if needed, would result in a reduction of impingement as a result of continued plant operation."</p>

**Vermont Yankee Nuclear Power Station
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Number	Page	Line Number(s)	Comment
41	4-20	14 - 16	Revise sentence to read as follows; "However, under the provisions of the CWA 316(b) Phase II regulations, VYNPS may implement additional measures, if needed, in coordination with the VDEC to meet the impingement numerical performance standards outlined in the regulations, thereby ultimately reducing impingement from plant operations even further."
42	4-44	18	Change "2.2.5.5" to "2.2.5.2" to correct a typographical error.
43	4-47	19	Change "(Table 2-11)" to "(Tables 2-11 and 2-12)" to capture <u>all</u> State-listed threatened or endangered species. Table 2-11 shows only a partial listing.
44	4-48	17	Change "Entergy 2005e" to "Entergy 2005a" to accurately reflect the reference source in the Section 4.10 references of the Draft SEIS.
45	4-48	9	Change the spelling of Spectruc to Spectrus NX-1104 to accurately reflect the name of the product.
46	4-49	39	Change "NRC 1999" to "NRC 1996" to accurately reflect the reference source in the Section 4.10 references of the Draft SEIS.
47	4-53	5	Change "Savoy et al. 2004" to "Savoy and Crecco 2004" to accurately reflect the reference listing in the Section 4.10 references of the Draft SEIS.
48	4-54	19 – 21	Revise sentence to read as follows:"However, under the provisions of the CWA 316(b) Phase II regulations, VYNPS may implement additional measures, if needed, in coordination with the VDEC to meet the numerical performance standards outlined in the regulations, thereby ultimately reducing entrainment and impingement from plant operations even further."
49	4-58	2	Change "(as listed in Table 2-1)" to "(as listed in Table 2-2)" to accurately reflect the source for the onsite wells.
50	4-59	N/A	Add "36 CFR Part 800. Code of Federal Regulations, Title 36, <i>Parks, Forests and Public Property</i> , Part 800, "Protection Of Historic Properties" to the Section 4.10 references since it is in the section write-up and is consistent with other regulations listed in this section.
51	4-59	N/A	Add "40 CFR Part 1508. Code of Federal Regulations, Title 40, <i>Protection of Environment</i> , Part 1508, "Terminology And Index" to the Section 4.10 references since it is in the section write-up and is consistent with other regulations listed in this section.
52	4-59	N/A	Add "Federal Water Pollution Control Act of 1977 33 USC 1326, et seq. (Also known as the Clean Water Act [CWA])" to the Section 4.10 references since it is in the section write-up and is consistent with other Acts listed in this section.

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Number	Page	Line Number(s)	Comment
53	4-59	N/A	Add "National Historic Preservation Act of 1966, as amended (NHPA) 16 USC 470, et seq." to the Section 4.10 references since it is in the section write-up and is consistent with other Acts listed in this section.
54	Sections 5 and G	N/A	The draft VYNPS SEIS notes (Page G-33, Lines 16-18) that SAMA 63 is cost-beneficial because, "when the impact of uncertainties is included, the benefit of SAMA 63 becomes approximately \$250,000." However, the first paragraph on page G-27 of the draft VYNPS SEIS states that the revised assumptions for this SAMA are reasonable and acceptable. The revised assumptions for SAMA 63 (presented on page 22 of Entergy 2006d) resulted in a baseline benefit estimate of \$116,000. Multiplying this value by the uncertainty factor of 2.15 (draft VYNPS SEIS Page G-32, line 26) results in a benefit with uncertainty of \$249,400, which rounds to \$249k. The estimated cost is \$250k. Thus, SAMA 63 is very close to being cost beneficial when uncertainty is included. However, the reason uncertainty is applied is to include SAMAs that are close to being cost-beneficial. There is no basis for including SAMAs that are close <u>after</u> applying uncertainty. Therefore, SAMA 63 is <u>not</u> potentially cost-beneficial.
55	5-3	17	Change "Entergy 2006" to "Entergy 2006a" to accurately reflect the reference source in the Section 5.3 references of the Draft SEIS.
56	5-3	33	Delete "(NRC 1996)" {Footnote on page 5-1 states that all GEIS references are to the GEIS and Addendum 1}
57	5-4	25	Change "Entergy 2006" to "Entergy 2006a" to accurately reflect the reference source in the Section 5.3 references of the Draft SEIS.
58	5-5	29	Change four to three.
59	5-9	26	Change four to three.
60	5-9	29	Delete bullet for SAMA 63
61	5-11	1 – 4	There is no "Entergy 2006b" reference listing in the Section 5.0 write-up (Pages 5-1 through 5-10).
62	5-11	16 - 19	There is no "Entergy 2006e" reference listing in the Section 5.0 write-up (Pages 5-1 through 5-10).
63	6-6	16	Need to add "(NRC 2005)" after "(70 FR 53313)" to tie it to the reference source in the Section 6.2 references of the Draft SEIS.
64	6-10	8	Need to reconcile the "September 28, 2005" date with the "September 8, 2005" date shown on Page 6-6 (Line 16) of the Draft SEIS which states "...proposed revisions to 10 CFR Part 63 on September 8, 2005 (70 FR 53313)".

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Number	Page	Line Number(s)	Comment
65	6-10	6 - 8	There is no "NRC 2005" reference listing in the Section 6.0 write-up (Pages 6-1 through 6-8). Refer to Comment 59 to correct this item.
66	8-7	34	Change "(Section 3.2.1; Entergy 2005)" to "(Entergy 2006)" to accurately reflect the reference source in the Section 8.4 references of the Draft SEIS. As a note, there is no "Entergy 2005" in the Section 8.4 references of the Draft SEIS.
67	8-7	37	Change "(Entergy 2005)" to "(Entergy 2006)" to accurately reflect the reference source in the Section 8.4 references of the Draft SEIS.
68	8-11	8	Under the <u>Impact Column</u> , change "MODERATE to LARGE" to "SMALL to LARGE" based on the conclusions reached for transportation on Page 8-17 of the Draft SEIS.
69	8-14	22	Change "(Entergy 2005)" to "(Entergy 2006)" to accurately reflect the reference source in the Section 8.4 references of the Draft SEIS.
70	8-22	8	Under the <u>VYNPS Site Impact Column</u> , change "SMALL to MODERATE" to "MODERATE to LARGE" based on the conclusions reached for ecology on Page 8-26 of the Draft SEIS.
71	8-23	9	Under the <u>VYNPS Site Comments Column</u> , change ".....during construction would be SMALL" to ".....during construction would be MODERATE" since the conclusions reached for transportation during construction on Page 8-29 of the Draft SEIS was classified as "MODERATE".
72	8-23	9	Under the <u>Alternate Site Comments Column</u> , change "Impacts during construction would be SMALL" to "Impacts during construction would be MODERATE" since the conclusions reached for transportation during construction on Page 8-29 of the Draft SEIS was classified as "MODERATE."
73	8-24	1	Under the <u>VYNPS Site Impact Column</u> , change "MODERATE" to "SMALL to MODERATE" based on the conclusions reached for socioeconomics on Page 8-29 of the Draft SEIS.
74	8-24	1	Under the <u>Alternate Site Impact Column</u> , change "MODERATE" to "SMALL to MODERATE" based on the conclusions reached for socioeconomics on Page 8-29 of the Draft SEIS.
75	8-24	2	Under the <u>VYNPS Site Impact Column</u> , change "MODERATE" to "SMALL to MODERATE" based on the conclusions reached for transportation on Page 8-29 of the Draft SEIS.
76	8-24	2	Under the <u>Alternate Site Impact Column</u> , change "MODERATE" to "SMALL to MODERATE" based on the conclusions reached for transportation on Page 8-29 of the Draft SEIS.

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Number	Page	Line Number(s)	Comment
77	8-32	18 - 20	Delete the sentence "An evaluation of the impacts of a new nuclear generating plant to replace VYNPS was not included in the Entergy ER (Entergy 2006)" since the statement is incorrect. Section 8.1.3 of the Entergy ER contained an evaluation of the impacts of a new nuclear generating plant at an alternate site to replace VYNPS.
78	8-33	11	Under the <u>Impact Column</u> , change "SMALL" to "SMALL to MODERATE" based on the conclusions reached for air quality on Page 8-35 of the Draft SEIS.
79	8-33	11	Under the <u>Comments Column</u> , change "...during construction would be SMALL" to "...during construction would be MODERATE" based on the conclusions reached for air quality on Page 8-35 of the Draft SEIS.
80	8-33	15	Under the <u>Impact Column</u> , change "MODERATE to LARGE" to "SMALL to LARGE" based on the conclusions reached for transportation on Page 8-36 of the Draft SEIS.
81	8-34	4	Under the <u>Comments Column</u> , change ".....impacts ranging from SMALL to MODERATE" to only "....."MODERATE impacts" to be consistent with the conclusions reached for aesthetics on Page 8-36 of the Draft SEIS.
82	8-34	7	Under the <u>Impact Column</u> , change "SMALL to LARGE" to "SMALL" only based on the conclusions reached for environmental justice on Page 8-37 of the Draft SEIS.
83	8-35	25	Would recommend deleting "(see Section 2.2.2)" since it is not clear why the Draft SEIS is referencing this section here and it appears to be inappropriate at the end of the sentence.
84	8-40	11	Change "(PNNL 1986)" to "(PNL 1986)" to correct a typographical error and to accurately the reference listing in the Section 8.4 references of the Draft SEIS.
85	8-48	9	Under the <u>VYNPS Site Impact Column</u> , change "MODERATE" to "SMALL to MODERATE" based on the conclusions reached under the <u>VYNPS Site Comments Column</u> for this category.
86	8-49	1	Under the <u>VYNPS Site Impact Column</u> , change "MODERATE" to "SMALL to MODERATE" based on the conclusions reached under the <u>VYNPS Site Comments Column</u> for this category.
87	8-49	1	Under the <u>Alternate Site Impact Column</u> , change "MODERATE" to "SMALL to MODERATE" since operational impacts would be the same as that for the VYNPS site (SMALL).
88	8-49	1	Under the <u>Alternate Site Comments Column</u> , add the sentence "Impact during operation would be SMALL."
89	8-49	2	Under the <u>VYNPS Site Impact Column</u> , change "MODERATE" to "SMALL to MODERATE" based on the conclusions reached under the <u>VYNPS Site Comments Column</u> for this category.

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Number	Page	Line Number(s)	Comment
90	8-49	2	Under the <u>Alternate Site Impact Column</u> , change "MODERATE" to "SMALL to MODERATE" based on the conclusions reached under the <u>Alternate Site Comments Column</u> for this category.
91	8-51	N/A	Add "Tax Reform Act of 1986, Pub. L. 99-514; 99th Cong., H.R. 3838 (JCS-10-87)" to the Section 8.4 references since it is in the section write-up and to be consistent with typical Acts listed in this section.
92	8-55	20 – 22	There is no "NRC 2001" reference listing in the Section 8.0 write-up (Pages 8-1 through 8-51).
93	8-55	31 - 33	Change "Walsh, M.E., et al. 2000" to "Walsh, M.E., Perlack, R.L., Turhollow, A., Ugarte, D.T., Becker, D.E., Graham, R.L., Slinsky, S.E. and Ray, D.E. 2000" to capture all authors.
94	9-5	26 - 29	Recommend revising the sentence; "However, under the provisions of the Clean Water Act 316(b) Phase II regulations, the Vermont Department of Environmental Conservation may impose further restrictions or require modifications to the cooling system to reduce the impacts on aquatic resources from entrainment and impingement". Revise to read as follows: "However, under the provisions of the Clean Water Act 316(b) Phase II regulations, VYNPS may implement additional measures, if needed, in coordination with the VDEC to meet the numerical performance standards outlined in the regulations, thereby ultimately reducing entrainment and impingement from plant operations."
95	9-6	7 – 11	Recommend revising the sentence; "However, under the provisions of the Clean Water Act 316(b) Phase II regulations, the Vermont Department of Environmental Conservation may impose further restrictions or require modifications to the cooling system to reduce the impacts on aquatic resources from entrainment and impingement". Revise to read as follows; "However, under the provisions of the Clean Water Act 316(b) Phase II regulations, VYNPS may implement additional measures, if needed, in coordination with the VDEC to meet the numerical performance standards outlined in the regulations, thereby ultimately reducing entrainment and impingement from plant operations."
96	9-8	19	Under the <u>Coal-Fired Generation (Alternate Site) Column</u> , change "MODERATE to LARGE" to "SMALL to LARGE" based on the conclusions reached for transportation on Page 8-17 of the Draft SEIS.

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Draft SEIS Comments
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Number	Page	Line Number(s)	Comment
97	9-8	8	Under the <u>Natural Gas-Fired Generation (VYNPS Site) Column</u> , change "SMALL to MODERATE" to "MODERATE to LARGE" based on the conclusions reached for ecology on Page 8-26 of the Draft SEIS.
98	9-8	18	Under the <u>Natural Gas-Fired Generation (VYNPS Site) Column</u> , change "MODERATE" to "SMALL to MODERATE" based on the conclusions reached for socioeconomics on Page 8-29 of the Draft SEIS.
99	9-8	19	Under the <u>Natural Gas-Fired Generation (VYNPS Site) Column</u> , change "MODERATE" to "SMALL to MODERATE" based on the conclusions reached for transportation on Page 8-29 of the Draft SEIS.
100	9-8	18	Under the <u>Natural Gas-Fired Generation (Alternate Site) Column</u> , change "MODERATE" to "SMALL to MODERATE" based on the conclusions reached for socioeconomics on Page 8-29 of the Draft SEIS.
101	9-8	19	Under the <u>Natural Gas-Fired Generation (Alternate Site) Column</u> , change "MODERATE" to "SMALL to MODERATE" based on the conclusions reached for transportation on Page 8-29 of the Draft SEIS.
102	9-8	15	Under the <u>New Nuclear Generation (Alternate Site) Column</u> , change "SMALL" to "SMALL to MODERATE" based on the conclusions reached for air quality on Page 8-35 of the Draft SEIS.
103	9-8	19	Under the <u>New Nuclear Generation (Alternate Site) Column</u> , change "MODERATE to LARGE" to "SMALL to LARGE" based on the conclusions reached for transportation on Page 8-36 of the Draft SEIS.
104	9-8	24 -25	Under the <u>New Nuclear Generation (Alternate Site) Column</u> , change "SMALL to LARGE" to "SMALL" only based on the conclusions reached for environmental justice on Page 8-37 of the Draft SEIS.
105	9-8	15	Under the <u>Combination of Alternatives (VYNPS Site) Column</u> , change "MODERATE" to "SMALL to MODERATE" based on the conclusions reached for air quality in Table 8-8 on Page 8-48 of the Draft SEIS.
106	9-8	18	Under the <u>Combination of Alternatives (VYNPS Site) Column</u> , change "MODERATE" to "SMALL to MODERATE" based on the conclusions reached for socioeconomics in Table 8-8 on Page 8-49 of the Draft SEIS.
107	9-8	19	Under the <u>Combination of Alternatives (VYNPS Site) Column</u> , change "MODERATE" to "SMALL to MODERATE" based on the conclusions reached for transportation in Table 8-8 on Page 8-49 of the Draft SEIS.

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Number	Page	Line Number(s)	Comment
108	9-8	18	Under the <u>Combination of Alternatives (Alternate Site) Column</u> , change "MODERATE" to "SMALL to MODERATE" based on the conclusions reached for socioeconomics in Table 8-8 on Page 8-49 of the Draft SEIS.
109	9-8	19	Under the <u>Combination of Alternatives (Alternate Site) Column</u> , change "MODERATE" to "SMALL to MODERATE" based on the conclusions reached for transportation in Table 8-8 on Page 8-49 of the Draft SEIS.
110	9-9	17 - 18	There is no "Entergy 2006c" reference listing in the Section 9.0 write-up (Pages 9-1 through 9-8).
111	E-5	5	Change "0002-44-04-X" to "0002-44-07" under <u>Number Column</u> , "01/01/06" to "01/01/07" under <u>Issue Date Column</u> and "12/31/06" to "12/31/07" under <u>Expiration Date Column</u> on Table E-2.
112	E-5	6	Change "T-VT001-L06" to "T-VT001-L07" under <u>Number Column</u> , "01/01/06" to "11/20/06" under <u>Issue Date Column</u> and "12/31/06" to "12/31/07" under <u>Expiration Date Column</u> on Table E-2.
113	E-27	33	Change "(NRC 2006a)" to "(NRC 2006b)" to accurately reflect the reference source in the Section 9.0 references in Appendix E of the Draft SEIS.
114	E-35	34	"Marcy (2004c (1976c))" is not listed in the Section 9.0 references in Appendix E of the Draft SEIS.
115	E-40	8	"(Entergy 2005e)" is not listed in the Section 9.0 references in Appendix E of the Draft SEIS.
116	E-40	11	Change "(VDEC 2005a)" to "(VDEC 2005)" to accurately reflect the listing in the Section 9.0 references in Appendix E of the Draft SEIS.
117	E-42	32	"(DeWald 2006c)" is not listed in the Section 9.0 references in Appendix E of the Draft SEIS.
118	E-52	29	"(VFWD 2006)" is not listed in the Section 9.0 references in Appendix E of the Draft SEIS.
119	E-53	34	As a suggestion, change "could install a fish return system or operate the station in the closed-cycle cooling mode" to "could implement technology or operational measures".
120	E-55	6	Under the <u>Expected Effect of VYNPS Operations on EFH Column</u> , change "Parr habitat no present" to "Parr habitat not present" to correct a typographical error.
121	E-56	N/A	Add "Magnuson-Stevens Fishery Conservation and Management Act of 1976, 16 U.S.C. 1801-1882, as amended 1996" to the Section 9.0 references in Appendix E of the Draft SEIS since it is in the section write-up and is consistent with other Acts listed in this section.
122	E-56	39 - 40	"Dewald 2006a" is not listed in the Section 9.0 references in Appendix E of the Draft SEIS.

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Number	Page	Line Number(s)	Comment
123	E-56	33 & 36	Change "Dewald" to "DeWald" to correct a typographical error.
124	E-57	1	Change "Dewald" to "DeWald" to correct a typographical error.
125	E-60	17 - 19	"NRC 2006a" is not listed in the Section 9.0 references in Appendix E of the Draft SEIS.
126	G-6	2	Insert "(Entergy 2006b)" after "improvements"
127	G-6	30	Insert "(Entergy 2006c)" after "Table G-3"
128	G-7	10	Change " 4.2×10^{-6} " to " 4.3×10^{-6} " {Page 13 of Entergy 2006c states the CDF for VY02R0 is 4.28E-06}
129	G-8	46	Change "0.25" to "0.25g" to be consistent with Line 46 of Page G-15
130	G-9	1	Change "0.29" to "0.29g"
131	G-15	22	Change "contributes" to "contribute"
132	G-16	11	Change "205 through 224" to "205 through 211 and 212" {See pages 18 and 19 of Entergy 2006b}
133	G-16	24 & 25	Change "282 through 284" to "214 through 224 and 282 through 284" {See pages 20 and 21 of Entergy 2006b}
134	G-18	4	Change "1" to "<1" to be consistent with Lines 42 and 43 of Page G-22
135	G-24	10	change "1" to "<1" in CDF column {to be consistent with other SAMAs}
136	G-24	14	Change "1" to "<1" in Population Dose column {to be consistent with other SAMAs}
137	G-24	20	The clarification of the response to RAI 5.j (page 7 of Entergy 2006d) states that re-evaluation of the benefit of SAMA 59 results in a revised baseline benefit with uncertainty of \$1,424. In the draft VYNPS SEIS, this value has inadvertently been used for the benefit using 7% discount rate without uncertainty. The value for the 7% discount rate benefit is \$663 and the 3% discount rate value is \$745.
138	G-24	20	Change 1,400 to 600
139	G-24	20	Change 1,900 to 700
140	G-25	7 - 10	Change from bold to normal font.
141	G-25	9	Change "remover" to "remove" in assumptions column
142	G-28	30 & 31	Separate paragraphs by one line.
143	G-30	29	Change "megawatt electrics" to "megawatts electric"
144	G-31	32	Change four to three.
145	G-33	6	delete "Of particular note is the revised evaluation of Phase II SAMA 63."
146	G-33	16 - 18	Replace "The NRC staff notes that when the impact of uncertainties is included, the benefit of SAMA 63 becomes approximately \$250,000. Therefore, SAMA 63 is potentially cost-beneficial.," with "Since the cost of implementing this SAMA is larger than the associated benefit, SAMA 63 is not cost-beneficial for VYNPS."

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Number	Page	Line Number(s)	Comment
147	G-34	31-32	Delete "(1) control containment venting within a narrow pressure band (SAMA 63)," and change subsequent bullet numbers.
148	G-34	41	Change "four" to "three"
149	G-34	42 - 43	Delete "(1) control containment venting within a narrow pressure band (SAMA 63)," and change subsequent bullet numbers
150	G-35	10	Delete colon after "of"
151	G-35	30	Change "four" to "three"
152	G-36	N/A	Add "10 CFR Part 54. <i>Code of Federal Regulations</i> , Title 10, <i>Energy</i> , Part 54, "Requirements for Renewal of Operating Licenses for Nuclear Power Plants" to the Section G.8 references in Appendix G of the Draft SEIS since it is in the section write-up and is consistent with other regulations listed in this section.
153	G-37	6	Change "U.S. Department of Agriculture to "U.S. Department of Agriculture (USDA)" to accurately reflect listing in section write-up.
154	G-37	40 - 42	"NRC 2003" is not referenced in the Appendix G write-up (Pages G-1 through G-36) of the Draft SEIS.
155	G-38	N/A	"VYNPC 2000" is not referenced in the Appendix G write-up (Pages G-1 through G-36) of the Draft SEIS.