

July 9, 2007

ORGANIZATION: Nuclear Energy Institute (NEI)

SUBJECT: SUMMARY OF MARCH 21, 2007 MEETING WITH NUCLEAR ENERGY INSTITUTE AND INDUSTRY REPRESENTATIVES TO DISCUSS ENVIRONMENTAL REPORT CONTENT TO SUPPORT LICENSE RENEWAL APPLICATION REVIEWS

Members of the U.S. Nuclear Regulatory Commission (NRC) staff hosted a meeting with representatives of the Nuclear Energy Institute (NEI), license renewal applicants, and industry representatives and their contractors on March 21, 2007, at NRC Headquarters in Rockville, Maryland, to discuss the format and content of environmental reports submitted with applications for nuclear plant operating license renewal. A list of attendees is provided in Enclosure 1. Copies of the meeting agenda and meeting handouts are provided in Enclosures 2 and 3, respectively.

Bruce Boger, Associate Director for Operating Reactor Oversight and Licensing, Office of Nuclear Reactor Regulation, provided opening remarks. Mr. Boger highlighted the importance of applicants providing thorough environmental reports, focusing on the link between high-quality applications and an efficient and timely staff review.

The staff presentations began with a general overview of the principal statutes affecting NRC environmental reviews. The purpose of this presentation was to highlight external influences on the NRC's environmental review process, including how changes in environmental protection regulations and other agencies' interpretations of environmental statutes can affect NRC's environmental reviews.

The staff then made a series of presentations regarding specific review topics, including historic and archaeological resources, nonradiological waste and pollution prevention, and ecological resources. Each presentation included discussion of (1) the statutory and regulatory bases for NRC information requests; (2) specific regulatory requirements regarding application content; (3) information necessary for NRC staff to complete its environmental review; (4) useful resource materials for application preparation; (5) the advantages to applicants who engage relevant local, state, and Federal authorities and Native American tribes (e.g. State Historic Preservation Officer, U.S. Fish and Wildlife Service, etc.) early in the application process; and (6) suggestions of how applicants can provide support to NRC staff during environmental site audits to improve the efficiency of NRC staff reviews.

Following each presentation, the staff engaged in dialog with industry participants on issues related to the individual topic areas. During these discussions, the participants identified a number of specific issues in need of further clarification. These issues included (1) assessing cultural resource protection during the current operating term versus during the renewal term; (2) information needed by the staff regarding storage and handling of mixed wastes; (3) cooling system intake "best technology available" determinations and their relationship to permits issued to facilities pursuant to several sections of the Clean Water Act; (4) evaluation of

cumulative impacts, including such evaluation for a site with an active application for an early site permit or combined construction and operating license for a new nuclear unit; (5) how ISO 14000 programs may be considered in license renewal application reviews; and (6) how applicants should address the impacts of consumptive water use on riparian and aquatic systems. Resolution of these issues will be discussed in future meetings with NEI and industry representatives, as discussed below.

During these discussions the NRC staff reiterated its position that the requested information is necessary for the staff to satisfy its obligations under the National Environmental Policy Act of 1969, as amended, to describe the facility and its interactions with the environment. The staff indicated that, while much of the information can be obtained via site audits and/or requests for additional information, providing the information in environmental reports submitted with license renewal applications is expected to result in a more efficient and timely staff environmental review. NRC staff identified specific examples of thorough environmental reports, and described how coordination with related stakeholders provided benefit to applicants. Similarly, staff shared best practices and lessons learned from past license renewals, and referenced documents and contacts that an applicant may find beneficial when preparing environmental reports.

Several industry representatives voiced concerns with the perception that the staff was requesting more information related to generically resolved Category 1 issues in recent license renewal reviews than has previously been the case. The staff indicated that some of these requests were made to be responsive to comments regarding the thoroughness of the staff's facility descriptions provided in previous environmental impact statements. The staff indicated that providing information in these areas supports the regulatory requirements related to describing the facility and its interactions with the environment and supports the staff's independent evaluation of whether any new and significant information exists for associated Category 1 issues. Industry representatives questioned whether this represented a change from past NRC reviews related to Category 1 issues. This was identified as another area where further dialog with industry would be beneficial.

The meeting closed with the participants agreeing that a continuing dialog on the environmental review process would benefit both industry and the NRC staff. Several formats for this ongoing discussion were suggested, including participation by environmental counterparts in currently scheduled monthly conference calls and quarterly meetings with NEI on the license renewal process, as well as future workshops between industry and NRC environmental counterparts. It was agreed that NEI would coordinate with NRC staff regarding the appropriate venue for continued dialog.

At a May 31, 2007, meeting with industry regarding the environmental review process, industry representatives reiterated their concern regarding the perception that more information regarding Category 1 issues is being requested than in the past. The staff reiterated its position that the requested information is necessary to describe the facility, and that the

information also supports the staff's independent evaluation regarding the applicability of the generic Category 1 conclusion to individual facilities. The meeting participants agreed that this issue will be a subject for further discussion in future meetings of staff and industry environmental counterparts. Prior to issuance, a draft version of this summary was reviewed by NEI.

/RA/

Jennifer A. Davis, Project Manager
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Division of License Renewal
Office of Nuclear Reactor Regulation

Project No. 690

Enclosures:

1. List of Attendees
2. Meeting Agenda
3. Meeting Handouts

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NAME	J. Davis	S. Figueroa	R. Franovich (w/ comment)
DATE	06/22/07	06/20/07	07/9/07

OFFICIAL RECORD COPY

Letter to Nuclear Energy Institute from Jennifer Davis Dated July 9, 2007

DISTRIBUTION:

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INSTITUTE AND INDUSTRY REPRESENTATIVES TO DISCUSS
ENVIRONMENTAL REPORT CONTENT TO SUPPORT LICENSE RENEWAL
APPLICATION REVIEWS

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Nuclear Energy Institute

Project No. 690

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Michael H. Crowthers, Supervisor Nuclear
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Two North Ninth Street (GENPL4)
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Mr. Hugh Jackson
Public Citizen's Critical Mass Energy &
Environment Program
215 Pennsylvania Ave., SE
Washington, DC 20003

List of Attendees for March 21, 2007,
Meeting of NEI, Industry, and NRC

NAME	ORGANIZATION
Bruce Boger	Nuclear Regulatory Commission (NRC)
Rani Franovich	NRC
Robert Schaaf	NRC
Jennifer Davis	NRC
Harriet Nash	NRC
Jessie Muir	NRC
Molly Barkman	NRC
Eric Benner	NRC
Michael Masnik	NRC
Bo Pham	NRC
Alicia Williamson	NRC
Dennis Logan	NRC
Nathan Goodman	NRC
Liz Wexler	NRC
Ekaterina Lenning	NRC
Briana Harris	NRC
Kendra Klump	NRC
William Kennedy	NRC
Tom Alexion	NRC
Butch Burton	NRC
William Schuster	NRC
Laura Quinn	NRC
Jim Riley	Nuclear Energy Institute (NEI)
Henry Day	APS Palo Verde
Gregory DeCamp	Constellation

NAME	ORGANIZATION
Rich Gallagher	Dominion
Paul Aitken	Dominion
Abbas Mostala	Energy Northwest
Joe Frisco	Energy Northwest
Gary Young	Entergy
Dara Gray	Entergy
Bob West	Entergy
Rick Buckley	Entergy
Chuck Barlow	Entergy
Alan Cox	Entergy
Mark Giles	Entergy
Fred Polaski	Exelon
Tom Abbatiello	FPL
Ken Putnam	FPL
Steve Hale	FPL
David Kunsemiller	First Energy Nuclear Operating Company (FENOC)
Mike Banco	FENOC
Cliff Coster	FENOC
Greg Halnon	FENOC
William Victor	Nebraska Public Power District (NPPD)
K. M. Krumland	NPPD
James Holthaus	Nuclear Management Company (NMC)
Gene Eckholt	NMC
Terry Grabel	Pacific Gas & Electric
Michael Detimore	PPL Susquehanna
Jerome Fields	PPL Susquehanna
Jan Kozyra	Progress Energy
Mike Macfarlane	Southern Nuclear Company (SNC)

NAME	ORGANIZATION
Dale Fulton	SNC
Tom Moorer	SNC
Chalmer Myer	SNC
Richard Schalle	STARS Alliance
John Snooks	Areva
Massoud Tafazzoli	Areva
Bill McCaughey	ATL International (ATL)
Mark Orr	ATL
Bobbie Hurley	EarthTech
Jim Thomas	Enercon
Jill Brochu	Lepson Consulting
Alex Polonsky	Morgan Lewis
Mike Heath	PGN
Jim Holian	SAIC
Anne Lovell	TetraTech
Jon Cudworth	TetraTech
Deann Raleigh	US Scientech
Ashley Burton	self
Mitch Holthaus	self

AGENDA FOR NRC STAFF - INDUSTRY COUNTERPART
LICENSE RENEWAL ENVIRONMENTAL REPORT WORKSHOP

WEDNESDAY, MARCH 21, 2007

8:00 a.m. to 12:00 p.m.

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|------|--|--------------------------|
| I. | Registration | 7:45 a.m. - 8:00 a.m. |
| II. | Welcome and Opening Remarks
(NRC and NEI Staff) | 8:00 a.m. - 8:30 a.m. |
| III. | Environmental Statutes Overview
(NRC Staff) | 8:30 a.m. - 9:00 a.m. |
| IV. | Topic Presentations & Discussions (NRC Staff & Industry) | |
| | Historic and Archaeological Resources | 9:00 a.m. - 9:30 a.m. |
| | Nonradiological Waste | 9:30 a.m. - 10:00 a.m. |
| | Break | 10:00 a.m. - 10:15 a.m. |
| | Ecological Resources | 10:15 a.m. - 11:00 a.m. |
| V. | Public Questions & Comments | 11:00 a.m. - 11: 40 a.m. |
| VI. | Closing Remarks | 11:40 a.m. - 12:00 p.m. |

ENCLOSURE 2