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**Attachment 42 to PLA-6219  
Procedure NDAP-QA-0642, Revision 6,  
Non-radiological Environmental  
Compliance Program**

*(NRC Document Request 96)*

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**PROCEDURE CHANGE PROCESS FORM**

1. PCAF NO. <u>2006-1097</u>	2. PAGE 1 OF <u>3</u>	3. PROC. NO. <u>NDAP-QA-0642</u> REV. <u>6</u>
4. FORMS REVISED - <u>  </u> R <u>  </u> , - <u>  </u> R <u>  </u>		
5. PROCEDURE TITLE Nonradiological Environmental Compliance Program		
6. REQUESTED CHANGE PERIODIC REVIEW <input checked="" type="checkbox"/> NO <input type="checkbox"/> YES INCORPORATE PCAFS <input checked="" type="checkbox"/> NO <input type="checkbox"/> YES   # _____ # _____ # _____ # _____ REVISION <input type="checkbox"/> PCAF <input checked="" type="checkbox"/> DELETION <input type="checkbox"/> (CHECK ONE ONLY)		
7. SUMMARY OF / REASON FOR CHANGE As a resolution to CRA #753431: Revised Section 6.8 of NDAP-QA-0642 to reference OPS-15 to ensure any inspection-related NDE receives proper ISI review and oversight.		
Continued <input type="checkbox"/>		
8. DETERMINE COMMITTEE REVIEW REQUIREMENTS (Refer to Section 6.1.4) PORC REVIEW REQ'D? <input checked="" type="checkbox"/> NO <input type="checkbox"/> YES		9. PORC MTG# _____
<b>BLOCKS 11 THRU 16 ARE ON PAGE 2 OF FORM</b>		
17. <u>Jerrold McCormick</u> / <u>3014</u> / <u>3/6/2006</u> PREPARER                      ETN                      DATE (Print or Type)		18. COMMUNICATION OF CHANGE REQUIRED? <input checked="" type="checkbox"/> NO <input type="checkbox"/> YES    (TYPE) _____
19. <u>[Signature]</u> RESPONSIBLE SUPERVISOR (TMX 5219 Qualified)		SIGNATURE ATTESTS THAT RESPONSIBLE SUPERVISOR HAS CONDUCTED QADR AND TECHNICAL REVIEW UNLESS OTHERWISE DOCUMENTED IN BLOCK 16 OR ATTACHED REVIEW FORMS. CROSS DISCIPLINE REVIEW (IF REQUIRED) HAS BEEN COMPLETED BY SIGNATURE IN BLOCK 16 OR ATTACHED REVIEW FORMS.
<u>3/8/2006</u> DATE		
20. <u>[Signature]</u> FUM APPROVAL		<u>3/12/06</u> DATE
21. RESPONSIBLE APPROVER <u>N/A</u> INITIALS                      DATE		ENTER N/A IF FUM HAS APPROVAL AUTHORITY

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### PROCEDURE CHANGE PROCESS FORM

1. PCAF NO. 2006-1097 | 2. PAGE 2 OF 3 | 3. PROC. NO. NDAP-QA-0642 REV. 6

11. This question addresses 50.59 and 72.48 requirements of NDAP-QA-0726.  
 Either 11a or b must be checked "YES" and the appropriate form attached or referenced.
- a. This change is an Administrative Correction for which 50.59 and 72.48 are not applicable.  YES  N/A
- b. This change requires a 50.59/72.48 Applicability/Screen/Evaluation.  YES  N/A  
 (Attach if not previously issued).  
 Reference Applicability/Screening/Evaluation No. A-01-887
12. This change is consistent with the FSAR or an FSAR change is required.  YES  
 Change Request No. N/A
13. Should this change be reviewed for potential effects on Training Needs or Material?  YES  NO  
 If YES, generate an AR/NTG/PICN in NIMS and enter AR number. AR # N/A
14. Is a Surveillance Procedure Review Checklist required per NDAP-QA-0722?  YES  NO
15. Is this a Special, Infrequent or Complex Test/Evolution procedure per NDAP-QA-0320?  YES  NO

16. Reviews may be documented below or by attaching Document Review Forms NDAP-QA-0101-1.

REVIEW	REVIEWED BY WITH NO COMMENTS	DATE
QADR (TMX QADR Qualified)	_____	_____
TECHNICAL REVIEW (TMX 5218 Qualified)	_____	_____
REACTOR ENGINEERING/NUCLEAR FUELS *	_____	_____
ISI/IST **	_____	_____
OPERATIONS	_____	_____
STATION ENGINEERING	_____	_____
EMERGENCY PLANNING	_____	_____
MAINTENANCE	_____	_____
RADIATION PROTECTION	_____	_____
NUCLEAR MODIFICATIONS	_____	_____
NUCLEAR DESIGN	_____	_____
CHEMISTRY	_____	_____
OTHER _____	_____	_____

- \* Required for changes that affect, or have potential for affecting core reactivity, nuclear fuel, core power level indication or impact the thermal power heat balance. <sup>(58)</sup>
- \*\* Required for changes to Section XI Inservice Test Acceptance Criteria.

PROCEDURE COVER SHEET

PPL SUSQUEHANNA, LLC PROCEDURE	
NONRADIOLOGICAL ENVIRONMENTAL COMPLIANCE PROGRAM  ADHERENCE LEVEL: INFORMATION USE	NDAP-QA-0642 Revision 6 Page 1 of 25
<u>QUALITY CLASSIFICATION:</u> ( X ) QA Program    (   ) Non-QA Program	<u>APPROVAL CLASSIFICATION:</u> ( X ) Plant            (   ) Non-Plant (   ) Instruction
EFFECTIVE DATE:	<u>9/9/2005</u>
PERIODIC REVIEW FREQUENCY:	<u>N/A</u>
PERIODIC REVIEW DUE DATE:	<u>N/A</u>
<u>RECOMMENDED REVIEWS:</u> VP Nuclear Operations, Operations, Nuclear Regulatory Affairs, Nuclear Facilities Management, Nuclear Training, Site Engineering Group, Environmental Management Department	
Procedure Owner:	<u>Jerrold L. McCormick</u>
Responsible Supervisor:	<u>Supervisor-Programs &amp; Services</u>
Responsible FUM:	<u>Manager-Plant Chemistry</u>
Responsible Approver:	<u>Manager-Plant Chemistry</u>

PROCEDURE REVISION SUMMARY

TITLE: NONRADIOLOGICAL ENVIRONMENTAL COMPLIANCE PROGRAM

- 1) Incorporate PCAF #2004-1479, and 2004-1602.
- 2) List distribution for approved Environmental Evaluation Forms under 6.1.7.
- 3) List distribution for approved Environmental Evaluation Forms under 6.2.2.f.
- 4) Add summary of Annual Downstream User Notification requirement under 6.3.2.i.
- 5) Administrative deletion in 6.3.2.i.(4) - delete "and submits."
- 6) Updated 6.7.2 to reflect that the Site Fire Protection Engineer is responsible for the Site Halon Inventory.
- 7) Updated Attachment C, Susquehanna SES Environmental Evaluation Form.
- 8) Added HFC definition and corrected HCFC definition.
- 9) Changed Section 4 from "Special Tools/Equipment" to "Definitions."
- 10) Deleted Attachment D (Form NDAP-QA-0642-4), "Environmental Correspondence Review" Form.
- 11) Created new Attachment D, "Generic Erosion and Sedimentation Control Plan."

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1. PURPOSE

- 1.1 The purpose of this procedure is to establish the programs and responsibilities for maintaining compliance with environmental permits and the Environmental Protection Plan (EPP).
- 1.2 This procedure applies to the following:
  - 1.2.1 Proposed activities involving changes in plant design, operation, or maintenance which may significantly affect the environment.
  - 1.2.2 Operating occurrences involving unusual or important events which could have a significant environmental impact.
  - 1.2.3 Operational and construction activities which are conducted at the plant and are controlled by environmental permits, environmental regulatory standards, or the EPP.
- 1.3 Activities or occurrences which produce only radiological effects are not subject to the requirements of this procedure.

2. POLICY/DISCUSSION

- 2.1 The Environmental Protection Plan is included as Appendix B to the Facility Operating License. It ensures the continued protection of the environment during operation of the Susquehanna SES. The EPP contains two requirements:
  - 2.1.1 That PPL establish an Unreviewed Environmental Question (UEQ) program to determine whether proposed operational changes or tests may significantly affect the environment, thereby requiring USNRC review.
  - 2.1.2 That PPL report to the USNRC within 24 hours any Significant Environmental Event (SEE).
- 2.2 PPL also needs to secure and maintain permits, certifications, and approvals which are required by environmental agencies for the operation of Susquehanna SES.

3. REFERENCES

- 3.1 NDAP-QA-0702, Condition Report Process
- 3.2 Susquehanna SES Environmental Protection Plan, Appendix B to Facility Operating License NPF-14 (July 1982) and NPF-22 (March 1984)
- 3.3 Susquehanna SES Environmental Report - Operating License Stage

- 3.4 Susquehanna SES Final Environmental Statement, NUREG-0564, June 1981
- 3.5 Susquehanna SES Environmental Compliance Manual
- 3.6 Susquehanna Preparedness, Prevention, and Contingency (PPC) Plan
- 3.7 40 CFR Part 82 Protection of Stratospheric Ozone
- 3.8 NDAP-QA-0005, Conduct of the Susquehanna Review Committee
- 3.9 NDAP-QA-0720, Station Report Matrix and Reportability Evaluation Guidance
- 3.10 NDAP-00-0601; SSES Refrigerant Compliance Plan
- 3.11 Applicability Determination No. A-01-887
- 3.12 25 PA Code, Chapter 245; PA Storage Tank Regulations
- 3.13 40 CFR Part 280; Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks (USTs)
- 3.14 40 CFR Part 282; Approved Underground Storage Tank (UST) Programs
- 3.15 PPL Corporation Environmental Management System; Corporate Expectations Module for Tank Management
- 3.16 FD, Title 42, Chapter 116, Reporting Requirements, 11022
- 3.17 SSES Emergency Plan
- 3.18 Applicability Determination No. A-01-887

#### 4. DEFINITIONS

- 4.1 AR / CR (Action Request / Condition Report) Program - A PPL Susquehanna program which is utilized to identify a concern, review its reportability, and document a resolution.
- 4.2 AST (Aboveground Storage Tank) – One or a combination of stationary tanks with a capacity in excess of 250 gallons, including underground pipes and dispensing systems connected thereto within the emergency containment area, which is or was used to contain an accumulation of regulated substances, and the volume of which, including the volume of piping within the storage tank facility, is greater than 90 percent above the surface of the ground. The term includes tanks, which can be visually inspected from the exterior, in an underground area.

- 4.3 CFC (Chlorofluorocarbon) – A Class I ozone-depleting substance which is Regulated under 40 CFR 82 (includes Halons).
- 4.4 DMR (Discharge Monitoring Report) - The mechanism by which we report to the PaDEP on our compliance with our NPDES permit.
- 4.5 Environmental Evaluation - a formal determination of the significance of (1) a proposed activity which may have environmental consequences or (2) an event, such as a spill, which may have had environmental consequences.
- 4.6 EPCRA (Emergency Planning and Community Right-to-Know Act) – Implements Title III of the federal Superfund Amendments and Reauthorization Act of 1986.
- 4.7 EPP (Environmental Protection Plan) – Appendix B to the Facility Operating License. The EPP sets forth the environmental requirements with which we must comply during the operation of SSES.
- 4.8 HCFC (Hydrochlorofluorocarbon) – A Class II ozone-depleting substance which is regulated under 40 CFR 82. HCFCs are used as refrigerants, foam blowing agents, and in other applications.
- 4.9 HFC (Hydrofluorocarbon) - A refrigerant consisting of one or more Carbon atoms surrounded by fluorine and hydrogen atoms. Since no chlorine or bromine is present, HFCs do not deplete the ozone layer. HFCs are also regulated under 40CFR82.
- 4.10 NPDES (National Pollutant Discharge Elimination System) - The program by which PaDEP regulates the concentration and quantities of pollutants which may be discharged from SSES into waterways.
- 4.11 PaDEP - Pennsylvania Department of Environmental Protection
- 4.12 Refrigerant – A generic term used in this procedure to refer to all CFCs and HCFCs.
- 4.13 SEE (Significant Environmental Event) - An unusual or important event that could result in a significant impact upon the environment causally related to plant operation. Examples of SEEs are provided in Attachment B.
- 4.14 SRC - Susquehanna Review Committee.
- 4.15 Tier Two Inventory – Required under EPCRA, Section 312; the purpose of submitting a Tier Two Inventory Form is to provide the state and local officials and the public with specific information on hazardous chemicals present at SSES during the past year to facilitate local emergency planning efforts.

- 4.16 UEQ (Unreviewed Environmental Question) - A matter which involves a significant increase in an adverse environmental impact which has been previously evaluated, or which involves a significant and previously unevaluated adverse impact upon the environment. Criteria for significant impact can be found in Attachment A.
- 4.17 USNRC - United States Nuclear Regulatory Commission.
- 4.18 UST (Underground Storage Tank) - One or a combination of tanks (including underground pipes connected thereto) which are used to contain an accumulation of regulated substances, and the volume of which (including the volume of underground pipes connected thereto) is 10 percent or more beneath the surface of the ground.

## 5. RESPONSIBILITIES

- 5.1 Chemistry - Environmental Services (CH-ES) is responsible for:
  - 5.1.1 Establishing and maintaining the Environmental Compliance Program. This program ensures that the station and associated facilities are constructed, operated, and maintained in a manner consistent with the requirements of the Final Environmental Statement, the Environmental Protection Plan, and applicable environmental regulations.
  - 5.1.2 Overseeing environmental compliance in the day-to-day operations at the plant.
  - 5.1.3 Notifying Plant Staff of environmental regulations and standards that affect plant operation and maintenance.
  - 5.1.4 Ensuring the development and maintenance of environmental programs that effectively minimize environmental permit noncompliance.
  - 5.1.5 Providing management attention to environmental concerns and establishing priority on modifications or changes to operating practices which are required for environmental compliance.
  - 5.1.6 Establishing the appropriate methods of sample collection and analysis for determining compliance with station environmental permits.

- 5.1.7 Providing an interface with environmental regulatory agencies. This interface includes:
  - a. Negotiating limits and making applications for new, revised, or renewed environmental permits at SSES.
  - b. Obtaining approvals for the application of pesticides, herbicides, or rodenticides in or around SSES.
  - c. Submitting reports, excluding reports on radiological waste, to regulatory agencies as required for compliance with environmental regulations and permits.
  - d. Submitting the quarterly and biennial waste reports to the PaDEP.
- 5.1.8 Coordinating compliance with the EPP, which includes:
  - a. Reviewing and logging all environmental evaluations.
  - b. Preparing written evaluations and reports to the USNRC for activities and occurrences determined to involve unreviewed environmental questions or significant environmental events.
  - c. Preparing the Annual Environmental Operating Report (Nonradiological) for submittal to the USNRC.
- 5.1.9 Performing technology evaluations to enhance SSES's overall posture with regard to environmental compliance.
- 5.1.10 Providing support as requested for development of environmental programs, procedures, and training sessions.
- 5.1.11 Initiating changes to the EPP and ensuring such changes receive adequate review by SRC and other affected groups.
- 5.1.12 Conducting periodic assessments of the Environmental Programs put forth by this procedure to ensure they are in compliance with their associated regulations and requirements.
- 5.2 Nuclear Modifications is responsible for ensuring that any significant environmental impacts of design change packages are considered.
- 5.3 The Vice President-Nuclear Operations is responsible for ensuring that station operation is conducted in compliance with applicable environmental permits and standards.

- 5.4 The Shift Manager is responsible for ensuring that environmental notifications to the USNRC and outside environmental agencies are completed, as required by NDAP-QA-0720, when necessary due to operating occurrences.

<b>NOTE:</b> CH-ES is available to assist the Shift Supervisor in making notifications to environmental agencies other than the USNRC.
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- 5.5 The SSES Refrigerant Compliance Program Manager is an Environmental Scientist who is responsible for:
- 5.5.1 Ensuring day-to-day regulatory compliance in the management of SSES's refrigerant inventory.
  - 5.5.2 Serving as the primary interface for regulatory contact associated with refrigerant management.
  - 5.5.3 Overall management and implementation of SSES Refrigerant Compliance Plan (NDAP-00-0601).
- 5.6 The Site Fire Protection Engineer is responsible for the direct management of the Halon (a Category 1 CFC) fire suppression systems at SSES.
- 5.7 The Nuclear Training Group is responsible for maintaining records of any associated certifications, qualifications and periodic training for the environmental management programs put forth in this procedure.
- 5.8 Work group supervisors are responsible for:
- 5.8.1 Contacting CH-ES to initiate environmental evaluations, as required by this procedure, for proposed activities and operating occurrences within their area of expertise which may involve unreviewed environmental questions or significant environmental events.
  - 5.8.2 Ensuring that their duties are conducted in compliance with applicable environmental permits and standards.
  - 5.8.3 Incorporating the requirements of this procedure into their programs, as appropriate, to ensure that activities requiring environmental evaluations and/or controls are properly identified and implemented.
- 5.9 Environmental Management Department (EMD) provides consultation services to CH-ES concerning new regulatory policies. They also coordinate the drinking water sampling program company-wide.

- 5.10 Nuclear Licensing is responsible for ensuring that environmental reports are forwarded to the USNRC in accordance with the EPP.

6. PROCEDURE

6.1 Unreviewed Environmental Questions (UEQs)

**Evaluations of UEQs shall be completed before the work in question is performed.** (Exception: If a permit or approval for an activity is received from an environmental regulatory agency, then an environmental evaluation is not required.) USNRC approval must be obtained **before** beginning any work which constitutes a UEQ.

- 6.1.1 The work group supervisor shall initiate an environmental evaluation by completing Part I of Form NDAP-QA-0642-1 for any test, activity, or maintenance which has the potential for significant environmental impact, as exemplified in Attachment A.
- 6.1.2 The work group supervisor may complete the remainder of Form NDAP-QA-0642-1, using References 3.3, 3.4, and 3.5 for guidance.
- 6.1.3 The work group supervisor shall forward the environmental evaluation form to CH-ES.
- 6.1.4 CH-ES shall log the environmental evaluation on Attachment G.
- 6.1.5 CH-ES shall review or complete the Environmental Evaluation Form and forward it to the Supervisor - Chemistry Systems for approval.
- 6.1.6 The Supervisor - Chemistry Systems reviews the evaluation and indicates approval by signing at "Approved by."
- 6.1.7 After approval, CH-ES should transmit copies of the Environmental Evaluation Form to the originator, Chemistry Supervision, Nuclear Licensing, Nuclear Records, SRC Executive Assistant, and EMD.

<b>NOTE:</b> USNRC approval must be received before beginning any work which constitutes a UEQ.
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- 6.1.8 If the result of the environmental evaluation is that the work constitutes a UEQ:
- a. After SRC review, CH-ES shall prepare a letter to the USNRC which describes the activity to be performed.

- b. CH-ES shall then transmit the letter to Licensing for release to the USNRC.

## 6.2 Significant Environmental Events (SEEs)

6.2.1 Any environmental event which is determined to be significant must be reported to the USNRC within 24 hours. **AS SOON AS AN ENVIRONMENTAL EVENT IS DETERMINED TO BE SIGNIFICANT, AN AR SHALL BE GENERATED IN ACCORDANCE WITH NDAP-QA-0702.**

6.2.2 To determine whether an operating occurrence **which has already happened** has had a significant impact upon the environment, the following steps shall be performed:

- a. Any Nuclear Department personnel may initiate a SEE evaluation by completing Part I of Form NDAP-QA-0642-1.
- b. The initiator may complete the remainder of Form NDAP-QA-0642-1, using Attachment B of this procedure and the EPP for guidance.
- c. The initiator shall forward the Environmental Evaluation Form to CH-ES.
- d. CH-ES shall log the Environmental Evaluation Form on Attachment G.
- e. CH-ES shall review or complete the Environmental Evaluation Form and forward it to the Supervisor – Chemistry Systems for approval.
- f. After approval, CH-ES should distribute copies of the Environmental Evaluation Form to the originator, Chemistry Supervision, Nuclear Licensing, Nuclear Records, SRC Executive Assistant, and EMD.

6.2.3 It is also possible that an AR has been generated in response to an environmental event which has not yet been evaluated for its significance. In such cases, an environmental evaluation shall also be initiated.

## 6.3 Environmental Permits/Approvals/Registrations and Fees

6.3.1 Questions about whether a particular activity is covered by a given permit may be directed to CH-ES.

6.3.2

The following permits/approvals/registrations are in effect at SSES. The air pollution, water pollution, and drinking water areas are the most active and will be described in detail.

- a. **Water Quality Management Permits** for the sewage treatment plant and its expansion and for industrial waste discharges.
- b. **Submerged Land Licensing Agreements** for the river intake and discharge structures.
- c. **Fire Marshal Permits** for aboveground and underground storage tanks containing flammable or combustible liquids.
- d. **Soil Erosion Control Plan** for the plant site. Erosion controls must be maintained for life of plant.
- e. **Water Obstruction Permits** for annual maintenance at the intake and discharge structures.
- f. **Air Pollution Control Permit** for:
  - "A" - "E" Emergency Diesel Generators
  - Security Diesel Generator
  - Fire Pump Diesel Generator
  - Back-up Fire Pump Diesel Generator
  - Standby Diesel Generator (Blue Max)
  - Fugitive Dusting

Required activities include:

- (1) CH-ES prepares permit renewal application and remits associated fees, along with annual operating fees.
- (2) CH-ES performs a weekly inspection for any visible fugitive emissions leaving PPL property.
- (3) CH-ES evaluates any proposed earth-moving operations for the potential of causing fugitive dusting.
- (4) Plant Staff notifies CH-ES of any diesel generator malfunction that results in (or may result in) emissions exceeding opacity limits

- (5) Required DEP notifications are carried out per NDAP-QA-0720.

**g. Water Pollution Control Permit for NPDES Outfalls.** The activities in this area include the following:

- (1) CH-ES has lead responsibility for negotiating the final terms of the permit with PaDEP. CH-ES prepares the permit application, and submits it (along with the application fees) to PaDEP regional office in Wilkes-Barre. Environmental Management provides technical assistance as needed.
- (2) Chemistry collects and analyzes samples at frequencies which meet the requirements of the permit.
- (3) CH-ES prepares and submits a monthly Discharge Monitoring Report to PaDEP in accordance with the permit.
- (4) CH-ES investigates noncompliant conditions and recommends corrective actions.
- (5) CH-ES informs PaDEP of any noncompliance with permit requirements and through Licensing sends a copy of the notification to the US NRC.

**h. Public Water Supply IDs are active for the SSES site well system, Energy Information Center, Susquehanna Riverlands, and the West Building.** The activities in this area include the following:

- (1) Environmental Management prepares and submits applications to PaDEP for PWS ID's.
- (2) CH-ES and EMD coordinate sampling and analysis of all drinking water at SSES in accordance with applicable regulations.
- (3) CH-ES provides summaries of the drinking water analyses results to the applicable System Contact(s) as SSES.
- (4) CH-ES reports violations to PaDEP and sends copies to the USNRC (through Licensing).

i. Solid Waste Approvals/Spill Response

- (1) CH-ES secures environmental approvals from state and federal agencies except the USNRC.
- (2) CH-ES reviews contracts with waste disposal vendors for compliance with PaDEP regulations, and provides the day-to-day contact with the disposal vendors.
- (3) CH-ES maintains the Preparedness, Prevention and Contingency Plan (PPC) and the Spill Prevention Control and Countermeasures (SPCC) Plan to prevent the accidental pollution of the environment and the endangerment of public health and safety from releases of regulated substances.
- (4) CH-ES prepares the EPCRA-required Tier Two Inventory and submits it (along with annual fee) to the Luzerne County Hazardous Materials Response Fund.
- (5) CH-ES prepares the annual Downstream User Notification (a list of all regulated ASTs and their contents) and submits it to all downstream municipalities, water companies, industrial users, the local municipality, and the applicable County Emergency Management Agency(s) within 20 downstream miles from SSES. This notification is required by the PA Storage Tank and Spill Prevention Act of 1989 (Act 32).

j. Registration/Permitting of Storage Tanks

- (1) For SSES regulated ASTs and USTs, CH-ES updates and submits the DEP Registration/Permitting Form as necessary.
- (2) For SSES regulated ASTs and USTs, CH-ES remits the annual registration fees to DEP and the UST Indemnification Fund.
- (3) For regulated substances stored in SSES ASTs and USTs, CH-ES annually remits local emergency planning fees to the Luzerne County Hazardous Materials Response Fund as part of the Tier Two Inventory referenced in i.(4).

6.4 Environmental Reports

- 6.4.1 CH-ES prepares and submits the Annual Nonradiological Environmental Operating Report (this report contains the results of the required programs as defined in the EPP.) to Licensing, who transmits the report to the USNRC by May 1.
- 6.4.2 CH-ES prepares and submits the quarterly hazardous waste reports, the biennial hazardous waste reports, and the residual waste reports to the appropriate agencies.

6.5 Susquehanna River Low-Flow Augmentation

- 6.5.1 CH-ES conducts environmental studies as required by the Susquehanna River Basin Commission. CH-ES administers the Cowanesque Reservoir contract.

6.6 Environmental Compliance Task Force

- 6.6.1 A member of Chemistry-Environmental Services shall chair the committee.
- 6.6.2 Committee members and alternates should be selected from the following groups:
  - a. Environmental Management Department, PPL Service Corp.
  - b. Community Affairs, PPL Service Corp.
  - c. Compliance Services, Eastern Fossil and Hydro Generation
  - d. Plant Chemistry
  - e. Effluents Management
  - f. Station Engineering
  - g. Nuclear Operations
  - h. Nuclear Maintenance
  - i. Nuclear Facilities Management
  - j. Nuclear Assurance Services
  - k. Montour Steam Electric Station

6.6.3 The Environmental Compliance Task Force has the following purposes:

- a. Provide a forum for promoting environmental compliance at Susquehanna SES through communications, education, teamwork, and sharing resources.
- b. Address nonradiological environmental issues.
- c. Make recommendations for corrective actions.
- d. Lead initiatives at Susquehanna SES that:
  - (1) prevent pollution and its costs;
  - (2) ensure compliance with all applicable environmental regulations; and
  - (3) promote continued improvement of environmental programs.
- e. Pool company resources to prepare permits in an efficient and cost-effective manner.
- f. Support Corporate Environmental Management Systems.

6.6.4 The committee shall meet approximately quarterly.

**6.7 SSES Refrigerant Management Program**

6.7.1 NDAP-00-0601 (SSES Refrigerant Compliance Plan) ensures that PPL Susquehanna, LLC is in compliance with all applicable federal and state regulations associated with the emission of Category 1 CFCs.

6.7.2 Halon (a Category 1 CFC) is utilized in numerous fire suppression systems at SSES. Direct management of the Halon inventory at SSES is the responsibility of the Site Fire Protection Engineer.

**6.8 Aboveground Storage Tank (AST) and Underground Storage Tank (UST) Management Program**

6.8.1 PPL Susquehanna, LLC manages the ASTs/USTs at SSES to meet the following PPL corporate expectations:

**NOTE: Inspections requiring NDE must be conducted in compliance with OPS-15 to receive proper ISI review and oversight.**

- a. All activities for regulated tanks will comply with applicable environmental federal, state, and local requirements.

PCAF

- b. Maintain registration/permitting of applicable ASTs and USTs.
- c. Maintain an up-to-date database of all storage tanks at SSES; tank information and data are to be maintained in a manner that is electronically accessible and compatible with Microsoft software.
- d. Develop and implement tank management procedures that are consistent with corporate expectations and review and update procedures at least every two years.
- e. Implement appropriate spill procedures.
- f. Identify risks associated with regulated and unregulated tanks and implement measures to manage the risks (measures should be considered in the context of costs and benefits).

## 6.9 SSES Erosion Control Program

### 6.9.1 Purposes

- a. To minimize soil erosion across the SSES landscape by allowing the natural vegetation to grow in lieu of regularly mowing it.
- b. To minimize soil erosion across the SSES landscape by planting water loving / soil stabilizing vegetation in places where the natural vegetation is insufficient for this purpose, or to enhance the natural vegetation's aesthetic appeal in high visibility areas.
- c. To identify conditions of excessive erosion across the SSES landscape (inside and outside the Protected Area) and mitigate those conditions in a timely manner to minimize the impact on personnel safety and the environment immediately surrounding the site.
- d. To monitor the physical integrity of the SSES storm drainage system (inside and outside the Protected Area) to ensure drainage pathways are clear and free flowing.

6.9.2 CH-ES and Nuclear Facilities Management (NFM) share the responsibility for the implementation of this program. The System Engineer for system 099C (Storm Drains) needs be kept informed of the program condition / status. General guidelines for preventing erosion from earth moving and construction projects are available in Attachment D.

7. RECORDS

- 7.1 Copies of reports, records, correspondence, and monitoring data which are required by environmental permits or the Environmental Protection Plan shall be submitted to Nuclear Records and retained for a minimum of five years, or longer if required by law.
- 7.2 Copies of Environmental Evaluation Forms (NDAP-QA-0642-1) shall be submitted to Nuclear Records and retained for the life of the plant.

**CRITERIA FOR DETERMINING WHEN AN  
EVALUATION OF AN UNREVIEWED  
ENVIRONMENTAL QUESTION IS REQUIRED**

This list provides criteria for determining when an activity involves environmental impact and should be reviewed on an Environmental Evaluation Form. The list should be used as a guideline for determining when an activity requires an evaluation. A common-sense approach is necessary in each case to determine if an action involves environmental impact which should be evaluated.

- A. Discharging solids, liquids, gases, chemicals or particulates, in excess of permit limits or from an unusual activity not specifically addressed in a regulation, permit or approval.
- B. Conducting earth moving, dredging or changing the land use on greater than one acre or to any wetland or flood plain surface.
- C. Modifying surface or groundwater withdrawal or consumptive use rates beyond maximum design criteria (Final Safety Analysis Report).
- D. Modifying station systems or treatment methods which could significantly affect the quantity, quality or heat content of station effluents.
- E. Increasing offsite operational noise levels.
- F. Having a broad impact on vegetation, mammals, birds, fishes, reptiles or other natural fauna or any individual of an endangered species.
- G. Disturbing designated historic and archeological sites or artifacts located on the Susquehanna River flood plain or along transmission lines.
- H. Changing methods of transmission line corridor maintenance or constructing additional transmission line corridors.
- I. Changing aesthetic qualities of the cooling towers or plume, station structures, transmission line corridors, or associated PPL facilities.
- J. Planning any other construction or operational activity which may result in adverse environmental impact or another type not specifically listed here.

**EXAMPLES OF SIGNIFICANT ENVIRONMENTAL EVENTS**

The following is a list of occurrences considered to be significant environmental events. This list is not complete but merely provides examples of the types and degree of activities considered to be significant environmental events. Chemistry – Environmental Services should be contacted whenever possible to provide assistance in determining the significance of individual occurrences.

- A. Bird collisions with station structures (i.e., cooling towers) involving greater than 100 individual birds within a one-week period.
- B. An obvious increase in fish mortality within a half mile of water bodies receiving runoff or discharges from the site.
- C. Localized increases in animal disease or mortality related to station operation.
- D. Localized increases in the incidence of plant diseases or impact on vegetation related to station operation.
- E. Mortality, injury or any detrimental occurrence to a member of a species protected by the Endangered Species Act.
- F. Increase in nuisance organisms (i.e., clams, pigeons, or rodents) or conditions (i.e., river temperatures greater than 87°F, river flow less than 800 cfs at Wilkes-Barre Gauging Station without low flow augmentation) which could affect operation of the plant or increase its impact on the environment.
- G. Chemical spills (solid, liquid or gas) requiring immediate notification of the Coast Guard National Response Center or other federal environmental agency and involving one of the following: fish, mammal or vegetation mortality as defined in B, C, or D above or soil contamination greater than 10,000 sq. ft.
- H. Any other unusual or important event that indicates or could result in environmental impact of a similar magnitude related to station operation or construction.

Environmental Evaluation No. \_\_\_\_\_

**SUSQUEHANNA SES ENVIRONMENTAL EVALUATION FORM**

I. A. Description of Activity/Event:

B. Environmental Impacts:

C. Reference (DCP, WA, CR #, Correspondence, Persons Notified, Other):

Chemistry-Environmental Services (CH-ES) will complete this evaluation, complete item I.D. and forward to the Supervisor – Chemistry Program & Svcs, NUCSA3. Otherwise, complete applicable sections of item II below.

D. Contact Person \_\_\_\_\_ Loc: \_\_\_\_\_ Need Date: \_\_\_\_\_ ETN: \_\_\_\_\_

II. A. Type of Evaluation:

- Unreviewed Environmental Question Evaluation (For Proposed Activities) Complete Section II.B
- Significant Environmental Event Evaluation (For Operating Occurrences) Complete Section II.C

B. Unreviewed Environmental Question Status

1. Does this proposed activity involve a significant environmental impact (as exemplified in Attachment A) not previously evaluated in the Environmental Report-Operating License Stage?

Basis  YES  NO

2. Does this proposed activity involve a significant increase in environmental impact previously evaluated in the Environmental Report-Operating License Stage?

Basis  YES  NO

3. Does this proposed activity involve a change in effluents or power level beyond present licensed operating limits?

Basis  YES  NO

**NOTE:** Forward completed evaluation to the Supervisor – Chemistry Programs & Svcs, NUCSA3. If the answer is YES to any of the above questions, Chemistry – Environmental Services must prepare a written evaluation and obtain NRC approval before physical work is undertaken.

C. Significant Environmental Event Status

- 1. Does this operating occurrence involve a significant environmental event, as exemplified in Attachment B, or any other event which indicates or could result in significant environmental impact related to station operation or associated facilities?

Basis

YES  NO

**NOTE:** Forward completed evaluation to the Supervisor – Chemistry Programs & Svcs, NUCSA3. If the answer is YES to the above question, the information shall be documented on a Condition Report to accomplish the 24-hour NRC notification and follow up. Copies of any additional documentation shall be forwarded to the Supervisor – Chemistry Programs & Svcs.

D. Preparer \* \_\_\_\_\_ Loc: \_\_\_\_\_ Date: \_\_\_\_\_ ETN: \_\_\_\_\_  
 (EG-932 Qualification Required)

III. A. Additional Concerns:

B. Chemistry Systems Review:

Reviewer \* \_\_\_\_\_ Date \_\_\_\_\_  
 (EG-932 Qualification Required)

Approved by: \_\_\_\_\_ Date \_\_\_\_\_

Distribution:

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**GENERIC EROSION AND SEDIMENTATION CONTROL PLAN**

1. All earth-moving activities and construction projects not governed by specific modification-related E&S control plans shall be subject to the requirements specified herein.
2. For all activities which require excavation, grading, or general disturbance of soil or vegetated areas, the following general work sequence shall be followed:

<b>NOTE:</b> All of the following steps may not be applicable for every project or work activity.
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- A. Installation of pre-excavation erosion and sedimentation control measures as contained within the governing work package, or as specified by the engineer.
  - B. Excavation, grading, or general earth moving as required.
  - C. Completion of all remaining construction activities identified within the governing work document.
  - D. Restoration and / or stabilization of all excavated / disturbed areas.
  - E. Removal of all temporary erosion and sedimentation control measures.
3. Areas prone to experiencing a high rate of erosion (such as steep slopes and roadway embankments) shall be seeded immediately after initial disturbance or rough grading.
  4. Any disturbed areas (with the exception of construction roadways) which will be left exposed and unworked for more than 20 days shall immediately receive a temporary seeding if occurring during the growing season. Mulch shall be applied to those areas during those times of the year when seeds will not effectively germinate and grow.
  5. Barriers such as straw bales and/or silt fences shall be installed as required to prevent soil and sediment from entering any drainage ditches and culverts. Silt fences shall not be installed, however, in areas subject to heavy flows of water, such as within ditches and culverts.
  6. Stockpiled soil shall be prevented from washing away by temporary seeding or by installation of barriers, such as straw bales and silt fences.
  7. Installed erosion and sedimentation control measures shall be inspected periodically and after each heavy rain. Perform maintenance as necessary to ensure that erosion and sedimentation control measures continue to function as intended.
  8. Removed topsoil and fill shall be handled as described in the Waste Pregeneration Form developed for this work package. All disposal areas for topsoil and fill shall be graded to a final slope of 3% or less.
  9. Erosion control matting shall be used on all permanent slopes steeper than 3:1.
  10. Unless the work plan specifies otherwise, the original grade and cover type shall be restored to any backfilled areas.
  11. Place seed or install sod vegetation within 7 to 10 days after final grading. Use mulch as necessary to protect the seeding until it takes hold.

