

From: STP_COL
To: <STP_COL.TWGWPO02.HQGWDO01@nrc.gov>
Date: 1/17/2008 10:06:41 AM
Subject: Fwd: STP Follow Up Meeting Tuesday November 6th at 2pm in (T6 F18)

>>> Paul Kallan 11/6/2007 10:23 AM >>>
Hi Greg/Bill:

The four outstanding issues in the STP Environmental Report are as follows: alternatives, cultural resources, ecological monitoring and telling the story.

Per our phone conversation, on October the 31st, 2007, Staff found the following information lacking in the ER. This information needs to be addressed in order to move forward. I suggested to you Greg, that NRG Energy will need to give me a schedule of when these items would be provided to the NRC. Depending on when the completed information is provided to us, there may be an impact on the NRC schedule.

1. Alternatives: The discussion of the alternative site selection process lacks the detail necessary to understand the decision-making points that result in the selection of the final alternative sites. There is no information provided regarding how many sites were considered, where they were located, or why specific sites were eliminated. The missing information needs to be included to connect the region of interest and the selected alternative sites. The information provided in the environmental report is not sufficient to enable the staff to determine if the alternative sites are among the best available sites. Staff is looking for a detail process of the site selection process.

2. Cultural Resources: A cultural and historic resource assessment needs to be prepared in order to address the potential for the project to impact important cultural resources onsite and in the surrounding area. Such assessments typically include, at a minimum, the following information:

- * A brief overview of the culture history of the area
- * A description of previous cultural resource assessments conducted for the subject property, including maps showing where previous field surveys for potential cultural artifacts were conducted
- * Mapped and written identification of areas to be disturbed by the proposed action, identifying areas that are currently heavily disturbed, surface disturbed, and undisturbed
- * Results of recent surveys conducted
- * Description of any cultural resources identified during past or present surveys
- * Impacts of project on important cultural resources and measures to be taken to avoid or mitigate those impacts.

The use of the 1973 survey is a suitable starting point for the current STP assessment. However, the information found in the original survey is limited in scope, incomplete, and does not fulfill the needs for the current impact assessment.

The issue of red chert at STP needs to be addressed in the ER so it can be dispositioned as a non-issue. If it is naturally occurring onsite, then that needs to be documented. If it is from offsite and brought in with ground cover shell/gravels, then that needs to be documented. If the source is not known, someone needs to do an assessment. There needs to be documentation so that if someone observes this material during future site visits or during construction, there is a paper trail that indicates that the issue was identified and dispositioned in 2007.

3. Ecological Monitoring: One-year of monitoring data is normally required and should include fish and shellfish at the intake and discharge structures. This may be particularly important with regard to determining impacts to species (e.g., brown and white shrimp) supported by Essential Fish Habitat in the estuaries of Matagorda Bay. This data is needed in order to be compliant with the Magnuson Stevens Fishery Conservation and Management Act. The data on fish and shellfish to be collected at the intake and discharge structures needs to be reflected in the draft EIS.

4. Telling the Story: In most of the sections, staff found that the document lacks the detail necessary to

understand the decision-making points to arrive at their conclusions. The environmental report does not provide a systematic approach from start to finish. For example, the staff has found the following sections were lacking the detail or telling the story: cultural resources, aquatic and terrestrial ecology, socioeconomics, environmental justice, air quality, alternatives and meteorology.

In closing, Greg, I hope this helps. I look forward to our phone conversation this afternoon.

regards,

Paul Kallan
Project Manager
301-415-2809

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