



Tennessee Valley Authority, 1101 Market Street, LP 5A, Chattanooga, Tennessee 37402-2801

May 28, 2008

10 CFR 52.79

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

In the Matter of) Docket Numbers 52-014 and 52-015
Tennessee Valley Authority)

NUCLEAR REGULATORY COMMISSION (NRC) – BELLEFONTE NUCLEAR
PLANT (BLN) – RESPONSE TO NRC INFORMATION NEEDS RELATED TO
ACCIDENTS, HEALTH PHYSICS, LAND USE, AND METEOROLOGY

Reference: Letter from Ashok Bhatnagar (TVA) to Mr. R. William Borchardt (NRC),
“Application for Combined License for BLN Units 3 and 4,” dated
October 30, 2007

The purpose of this letter is to provide responses to certain NRC information needs that were identified by the NRC reviewers during the Environmental Report (ER) site audit conducted at the Tennessee Valley Authority (TVA) Bellefonte Nuclear Plant Units 3 and 4 (BLN) site during the week of March 31 through April 4, 2008. The information needs addressed in this letter are related to the environmental review of accidents, health physics, land use, and meteorology.

By the referenced letter, TVA submitted an application for a combined license for two AP1000 advanced passive pressurized-water reactors at the BLN site. Included in the review of a combined license application (COLA) is a week-long environmental site audit during which the NRC staff tours the proposed plant site and environs and reviews the applicable documents that support the information provided in the ER. At the April 4, 2008 exit meeting for the BLN site audit, the NRC staff provided a list of information that was determined to be necessary to complete the review of the ER.

Enclosure 1 addresses the NRC information needs related to Accidents (Acc);
Enclosure 2 addresses the NRC information needs related to Health Physics, including

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radiation/fuel cycle/waste/ decommissioning (HP); Enclosure 3 addresses the NRC information needs related to land use (LU); and Enclosure 4 addresses the NRC information needs related to meteorology (Met). The BLN response to information needs LU-10 and Met-03 include changes to the BLN ER. New ER text is provided in underlined blue text, and deleted ER text is provided in red, strike-out text, as shown in Enclosures 3 and 4, respectively. Attachment A to Enclosure 4 provides the illustration that is identified in the BLN response to the information need Met-03.

If there are any questions regarding this application, please contact Phillip Ray at 1101 Market Street, LP 5A, Chattanooga, Tennessee 37402-2801, by telephone at (423) 751-7030, or via email at pmray@tva.gov.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 28th day of MAY, 2008.



Andrea L. Sterdis

Manager, New Nuclear Licensing and Industry Affairs
Nuclear Generation Development & Construction

Enclosures:

1. Responses to NRC Information Needs – Accidents (Acc)
2. Responses to NRC Information Needs – Health Physics (HP)
3. Responses to NRC Information Needs – Land Use (LU)
4. Responses to NRC Information Needs – Meteorology (Met)

cc (Enclosures):

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**RESPONSES TO NRC
INFORMATION NEEDS**

Accidents (Acc)

This enclosure provides the status of the seven NRC information needs related to the NRC review of postulated accidents involving radioactive material (Acc) and provides BLN responses to three of these Acc Information Needs.

Status of "Acc" Information Needs

NRC Information Need Number	Status
• Acc-1	Resolved at BLN site audit.
• Acc-2	Resolved at BLN site audit.
• Acc-3	Resolved at BLN site audit.
• Acc-4	Resolved at BLN site audit.
• Acc-5	Response provided in TVA's May 2, 2008 letter and this enclosure.
• Acc-6	Response provided in this enclosure.
• Acc-7	Response provided in TVA's May 2, 2008 letter and this enclosure.

NRC Review of the BLN Environmental Report

NRC Information Needs - BLN ER Site Audit Exit Meeting

NRC Environmental Category: ACCIDENTS

During the BLN Environmental Report site audit exit meeting on April 4, 2008, the NRC staff identified the following information need:

There is no discussion in section 7.2 as to potential changes in land used.

BLN INFORMATION NEED: Acc-05

BLN RESPONSE:

By correspondence dated May 2, 2008, TVA provided responses to comments made by the NRC reviewers during the sufficiency review of the BLN COLA, including the Applicant's Environmental Report. In response to comment ER30, TVA addressed the NRC reviewer's questions regarding potential changes in land use. Because NRC Information Need Acc-05 requests the same information as that discussed in response to ER-30, TVA refers the reviewers to the response provided in TVA's May 2, 2008, letter.

ASSOCIATED BLN COL APPLICATION REVISIONS:

None.

ATTACHMENTS:

None.

NRC Review of the BLN Environmental Report**NRC Information Need - BLN ER Site Audit Exit Meeting****NRC Environmental Category: ACCIDENTS**

During the BLN Environmental Report site audit exit meeting on April 4, 2008, the NRC staff identified the following information need:

The severe accident analysis includes an assessment of surface water pathway to 50 miles. MACCS2 calculates a water ingestion dose based on assumptions of water use. Provide a list of surface water users within 50 miles so we can evaluate whether MACCS2 doses are likely to be high or low.

BLN INFORMATION NEED: Acc-06**BLN RESPONSE:**

The MACCS2 methodology is not based on the number of surface water users, but is rather based on the fraction of deposited radionuclides assumed to be consumed through drinking water. The MACCS2 output does not provide information regarding an assumed amount of drinking water used in the region.

Excerpts from the MACCS2 User's Guide (ER Section 7.2, Reference 4) are provided in the two paragraphs below to facilitate a better understanding of the MACCS2 model:

“When radioactive material is deposited on the ground, it is expected that some fraction of this material will make its way into drinking water consumed by humans. MACCS2 models this uptake into drinking water as two separate paths: (1) deposition of material directly onto freshwater bodies and (2) deposition of material onto land with subsequent washoff into freshwater bodies.

The water ingestion model assumes that the area surrounding the site is divided into two categories: water and land. The radioactive material deposited on a spatial element is apportioned between water and land according to the fraction of the region covered by land.”

In the MACCS2 SITE data file, each sector of the 50-mile radius grid is assigned a population and a fraction of land (as opposed to water). Each sector is also assigned an ingestion factor, which is the ratio of Becquerel (Bq) ingested to Bq in the surface water bodies. The ingestion factor used in the BLN MACCS2 analysis is the same as that used in the sample problem provided in the MACCS2 User's Guide, and it is conservatively applied to all sectors (i.e., even if deposition occurs away from surface water bodies, it is assumed that a fraction of those radionuclides are still ingested through drinking water). MACCS2 uses these variables to determine the total population water ingestion dose. Therefore, a list of surface water users is not applicable to the MACCS2 analysis.

ASSOCIATED BLN COL APPLICATION REVISIONS:

None.

ATTACHMENTS:

None.

NRC Review of the BLN Environmental Report

NRC Information Needs - BLN ER Site Audit Exit Meeting

NRC Environmental Category: ACCIDENTS

During the BLN Environmental Report site audit exit meeting on April 4, 2008, the NRC staff identified the following information need:

Need to provide some information on groundwater pathways. Would like a discussion on other surface water pathways in addition to ingestion.

BLN INFORMATION NEED: Acc-07

BLN RESPONSE:

By correspondence dated May 2, 2008, TVA provided responses to comments made by the NRC reviewers during the sufficiency review of the BLN COLA, including the Applicant's Environmental Report. In response to comment ER31, TVA addressed the NRC reviewer's questions regarding groundwater and surface water pathways, including ingestion. Because NRC Information Need Acc-07 requests the same information as that provided in response to ER31, TVA refers the reviewers to the response provided in TVA's May 2, 2008, letter.

ASSOCIATED BLN COL APPLICATION REVISIONS:

None.

ATTACHMENTS:

None.

**RESPONSES TO NRC
INFORMATION NEEDS**

Health Physics (HP)

TVA Letter Dated: May 28, 2008

Responses to Environmental Report Information Needs – Health Physics

This enclosure provides the status of the seven NRC information needs related to the NRC review of Health Physics (HP), including radiation, fuel cycle, waste, and decommissioning information, and provides BLN responses to two of these HP Information Needs.

Status of “HP” Information Needs

<u>NRC Information Need Number</u>	<u>Status</u>
• HP-1	Response will be provided following revision of X/Q calculation (submittal expected by July 15, 2008)
• HP-2	Response will be provided following revision of X/Q calculation (submittal expected by July 15, 2008)
• HP-3	Response provided in TVA’s May 2, 2008 letter and this enclosure.
• HP-4	Resolved at BLN site audit; response provided in TVA’s May 2, 2008 letter.
• HP-5	Response provided in TVA’s May 2, 2008 letter and this enclosure.
• HP-6	Resolved at BLN site audit.
• HP-7	Resolved at BLN site audit.

NRC Review of the BLN Environmental Report**NRC Information Needs - BLN ER Site Audit Exit Meeting****NRC Environmental Category: RAD/FUEL CYCLE/WASTE/DECOMMISSIONING**

During the BLN Environmental Report site audit exit meeting on April 4, 2008, the NRC staff identified the following information needs:

- Table 5.4-1 has some suspect entries. If these were used in other calculations, their results are also suspect. The questionable entries include:
 - Average Distance to Where Fish are Caught (mi.)
 - Downstream Distance ... commercial fishing;
 - Downstream distance... shoreline activities (mi.)
 - Dilution Factor for Sport Fishing (mi.)

The latter should not be in miles. These four entries have identical values, which is suspect, especially since one of them should not be in miles.

- Projected population is provided for 2057, not 5 years from the time of the projected licensing action. Meat, milk, vegetables are averages, not by compass point.
- Major commercial fish and invertebrate catch locations, distances, transit times (unless 0 is used) not specified. Dilution factors in Table 5.4-1 have some problems. If these were used in other calculations, their results are suspect. Dilution Factor for Sport fishing should be in miles.

BLN INFORMATION NEED: HP-03**BLN RESPONSE:**

By correspondence dated May 2, 2008, TVA provided responses to comments made by the NRC reviewers during the sufficiency review of the BLN COLA, including the Applicant's Environmental Report. In response to comment ER24, TVA addressed the NRC reviewer's questions regarding suspect entries in Table 5.4-1; in response to comment ER25, TVA addressed the comment regarding projected population and commodity data, and in response to comment ER26, TVA provided the requested information relative to major commercial fish and invertebrate, including dilution factors in Table 5.4-1. Because NRC Information Need HP-03 requests the same information as that discussed in responses to ER24, ER25, and ER26, TVA refers the reviewers to the responses provided in TVA's May 2, 2008, letter.

ASSOCIATED BLN COL APPLICATION REVISIONS:

None.

ATTACHMENTS:

None.

NRC Review of the BLN Environmental Report

NRC Information Needs - BLN ER Site Audit Exit Meeting

NRC Environmental Category: RAD/FUEL CYCLE/WASTE/DECOMMISSIONING

During the BLN Environmental Report site audit exit meeting on April 4, 2008, the NRC staff identified the following information need:

Radiological Impacts to Members of the Public - Section 5.4.3 - Collective doses to the population within 80 km (50 mi) of the facility and occupational collective doses are not provided.

BLN INFORMATION NEED: HP-05

BLN RESPONSE:

By correspondence dated May 2, 2008, TVA provided responses to comments made by the NRC reviewers during the sufficiency review of the BLN COLA, including the Applicant's Environmental Report. In response to comment ER28, TVA addressed the NRC reviewer's questions regarding collective doses to the population within 50 miles of the facility and occupational collective doses. Because NRC Information Need HP-05 requests the same information as that discussed in response to ER-28, TVA refers the reviewers to the response provided in TVA's May 2, 2008, letter.

ASSOCIATED BLN COL APPLICATION REVISIONS:

None.

ATTACHMENTS:

None.

**RESPONSES TO NRC
INFORMATION NEEDS**

Land Use (LU)

TVA Letter Dated: May 28, 2008

Responses to Environmental Report Information Needs – Land Use

This enclosure provides the status of the 11 NRC information needs related to the NRC review of Land Use (LU), and provides BLN responses to four of these LU Information Needs.

Status of “LU” Information Needs

NRC Information Need Number	Status
• LU-1	Resolved at BLN site audit; errata to be addressed in later letter.
• LU-2	Resolved at BLN site audit.
• LU-3	Resolved at BLN site audit.
• LU-4	Resolved at BLN site audit.
• LU-5	Response provided in TVA’s May 2, 2008 letter and this enclosure.
• LU-6	Resolved at BLN site audit; response provided in this enclosure.
• LU-7	Resolved at BLN site audit; response provided in TVA’s May 2, 2008 letter.
• LU-8	Response provided in TVA’s May 2, 2008 letter and this enclosure.
• LU-9	Resolved at BLN site audit.
• LU-10	Response provided in this enclosure.
• LU-11	Resolved at BLN site audit.

NRC Review of the BLN Environmental Report**NRC Information Needs - BLN ER Site Audit Exit Meeting****NRC Environmental Category: LAND USE - TRANSMISSION LINES**

During the BLN Environmental Report site audit exit meeting on April 4, 2008, the NRC staff identified the following information need:

Section 3.7 refers to surveys completed regarding transmission routing during original application, but no details are provided. Please provide any surveys available on topic (even if they are not current). Describe process for conducting reconnaissance survey of existing transmission lines.

BLN INFORMATION NEED: LU-05**BLN RESPONSE:**

By correspondence dated May 2, 2008, TVA provided responses to comments made by the NRC reviewers during the sufficiency review of the BLN COLA, including the Applicant's Environmental Report. In response to comments ER01- ER03, TVA addressed the NRC reviewer's questions regarding reconnaissance surveys as related to pre-maintenance activities. As stated in ER Subsection 2.2.2, the transmission rights-of-way (ROWs) for Bellefonte Nuclear Plant Units 3 and 4 (BLN) were previously cleared for Units 1 and 2, when the transmission lines were constructed. The ROW maintenance that is expected to be performed prior to energizing the transmission lines is not anticipated to include ground-disturbing activities (ER Subsection 3.7.2.3). Therefore, data related to original transmission line surveys are not considered relevant to the proposed project. Because NRC Information Need LU-05 requests the same information as that discussed in response to ER01-03, TVA refers the reviewers to the response provided in TVA's May 2, 2008 letter.

ASSOCIATED BLN COL APPLICATION REVISIONS:

None.

ATTACHMENTS:

None.

NRC Review of the BLN Environmental Report

NRC Information Needs - BLN ER Site Audit Exit Meeting

NRC Environmental Category: LAND USE - TRANSMISSION LINES

During the BLN Environmental Report site audit exit meeting on April 4, 2008, the NRC staff identified the following information need:

Provide copy of Sensitive Area Review.

BLN INFORMATION NEED: LU-06

BLN RESPONSE:

During the week of March 31 through April 4, 2008, the NRC staff conducted an audit of the BLN site, including a review of the documentation supporting the BLN ER. The documentation provided to the staff included a document titled, "Sensitive Area Review (SAR) Process," which summarizes the environmental compliance review process TVA uses for maintenance and modifications of transmission lines. A brief description of the process by which TVA's Cultural Resources staff conducts sensitive area reviews for transmissions operations and maintenance projects is included in the SAR process document. TVA understands that the SAR process described in this document satisfies the staff's information need, and no additional documentation required in response to this information request.

ASSOCIATED BLN COL APPLICATION REVISIONS:

None.

ATTACHMENTS:

None.

NRC Review of the BLN Environmental Report

NRC Information Needs - BLN ER Site Audit Exit Meeting

NRC Environmental Category: LAND USE - TRANSMISSION LINES

During the BLN Environmental Report site audit exit meeting on April 4, 2008, the NRC staff identified the following information need:

Provide more detailed description of potential impacts of the activities required to re-energize the transmission lines (listed in Section 3.7).

BLN INFORMATION NEED: LU-08

BLN RESPONSE:

By correspondence dated May 2, 2008, TVA provided responses to comments made by the NRC reviewers during the sufficiency review of the BLN COLA, including the Applicant's Environmental Report. In response to comment ER06, TVA addressed the NRC reviewer's questions regarding potential impacts of the activities required to re-energize transmission lines, including "ground-truthing" activities for verification and resolution of discrepancies noted during aerial reviews. Because NRC Information Need LU-08 requests the same information as that discussed in response to ER06, TVA refers the reviewers to the response provided in TVA's May 2, 2008, letter.

ASSOCIATED BLN COL APPLICATION REVISIONS:

None.

ATTACHMENTS:

None.

NRC Review of the BLN Environmental Report**NRC Information Needs - BLN ER Site Audit Exit Meeting****NRC Environmental Category: LAND USE - TRANSMISSION LINES**

During the BLN Environmental Report site audit exit meeting on April 4, 2008, the NRC staff identified the following information need:

188 ac/previously undisturbed land estimate - define

BLN INFORMATION NEED: LU-10**BLN RESPONSE:**

During the week of March 31 through April 4, 2008, the NRC staff conducted an audit of the BLN site, including a review of the documentation supporting the BLN ER. The documentation provided to the staff included an explanation of data contained in ER Table 1.1-2, which reflects the acreage affected by various facilities associated with the proposed plant. The total acreage of affected areas for construction and operation was originally noted as 188 acres. Subsequent post-COLA submittal reviews determined that the area affected by construction was underestimated, and is actually closer to 200 acres, considering potential variables as to exact area covered by a given facility. Based on the current estimation, the associated ER text will be revised to indicate that approximately 200 acres are anticipated to be affected by construction. Based on the relatively small overall percentage represented by this change (from 188 to approximately 200 acres) in relation to the total site area (1600 acres), this change is considered to have a negligible effect on the impact significance determinations provided in ER Chapters 4 and 5.

ASSOCIATED BLN COL APPLICATION REVISIONS:

1. Revise COLA Part 3, ER Chapter 1, Table 1.1-2, as follows (only affected lines shown):

TABLE 1.1-2
ACREAGE AFFECTED BY VARIOUS FACILITIES ASSOCIATED WITH THE
PROPOSED PLANT

Construction Areas	Area Affected (to the nearest acre)
(ac.)	
Other Operational Support	15 14
Additional Construction Support	124 130
Total for Construction and Operation	188 193 (approximately 200)

2. Revise COLA Part 3, ER Chapter 4, Subsection 4.1.1.1, 2nd paragraph, as follows:

Approximately 400 ac. of the 1600-ac. BLN site have been affected by prior construction activities, which were deferred by the TVA in 1988. Although construction is planned for areas that have been disturbed by previous construction, an estimated additional ~~188~~ 200 ac. of the 1600-ac. site are expected to be affected by construction of the new facility. This planned additional construction area is currently covered with overgrowth and some forestation, and land use within the site consists primarily of a mix of forest and grassland zones. Land use within the site boundary is primarily deciduous forest and open developed land as described in Subsections 2.2.1.1 and 2.5.2.4, Table 2.2-1, and Figure 2.2-1.

3. Revise COLA Part 3, ER Chapter 4, Subsection 4.2.1.4, 1st paragraph, as follows:

Construction is expected to result in permanent structures occupying about ~~188~~ 200 ac. of the site (Figure 3.1-6). Because the BLN is located on a peninsula between the Guntersville Reservoir and an embayment arm of Guntersville Reservoir known as Town Creek, both water bodies could potentially be affected by site construction activities and stormwater runoff.

4. Revise COLA Part 3, ER Chapter 4, Subsection 4.2.1.10, 2nd paragraph, 4th sentence, as follows:

Because construction of Units 3 and 4 is estimated to require approximately ~~188~~ 200 ac. of newly incorporated areas as shown in Table 1.1-2, a site-specific NPDES or general NPDES permit is required.

5. Revise COLA Part 3, ER Chapter 4, Section 4.3, 2nd paragraph, as follows:

Generally, potential impacts associated with construction are temporary and minor, except for the addition of permanent structures, which affect a small percentage of habitats. An estimated ~~188~~ 200 ac. of the 1600-ac. site are expected to be affected by the construction of a new facility (Figure 4.3-1). (Calculation of affected acreage did not include 254 ac. of cultivated grasslands, because they are areas that have been previously altered and routinely maintained, and therefore are of poor habitat quality). When BLN construction is complete, approximately 60 ac. of the affected acreage are expected to contain permanent structures including paved lots. Altered areas not containing permanent structures are revegetated and routinely maintained following construction. Figure 3.1-6 depicts a detailed construction plan.

6. Revise COLA Part 3, ER Chapter 10, Table 10.1-1, Sheet 1 of 10, “Adverse Impact,” as follows:

~~An additional 188 ac.~~ Approximately 200 additional acres of the 1600-ac. site is disturbed or cleared during construction, with the potential for erosion. Land is not available for other uses. Much of this impact continues into the operational phase.

7. Revise COLA Part 3, ER Chapter 10, Table 10.1-1, Sheet 1 of 10, “Unavoidable Adverse Impacts,” as follows:

Disturbance of ~~an approximately 200 additional 188 ac. acres~~ of land occupied by the two units and associated infrastructure. Mitigation measures allow some of this land, particularly with respect to the transmission corridor, to be returned to its former state.

8. Revise COLA Part 3, ER Chapter 10, Table 10.1-2, Sheet 1 of 9, “Adverse Impact,” as follows:

Continued commitment of land use over the operational life of this project, amounting to disturbance of ~~an additional 188 ac.~~ approximately 200 additional acres of the 1600 ac. of the existing site for the BLN continued use of land for the existing transmission corridor.

9. Revise COLA Part 3, ER Chapter 10, Subsection 10.2.1.1, 1st paragraph, 1st sentence, as follows:

As described in Chapter 4 and 5, during the construction and operation of the BLN site, ~~an additional 188 ac.~~ approximately 200 additional acres of the 1600 ac. site is disturbed during construction of the reactor and land is also committed for continued use for the existing transmission corridor; this land is largely unavailable for uses other than for which it is being used to support the construction and operation of the nuclear units.

10. Revise COLA Part 3, ER Chapter 10, Subsection 10.4.2.2.1, as follows:

Loss of habitat is one of the costs of constructing Units 3 and 4. Land use related to construction of BLN is described in Section 4.1. No new land has been purchased for the siting of the two units. About 400 ac. of the 1600-ac. BLN site have been affected by prior construction which was deferred by TVA in 1988. Although construction is planned for previously disturbed areas, an estimated additional ~~188~~ 200 ac. of the 1600-ac. site are expected to be affected by construction of the new facility. Potential environmental impacts related to maintenance of the transmission corridors are considered to be SMALL. Most of the remaining land consists of various stages of grassland or forest combination.

11. Revise COLA Part 3, ER Chapter 10, Table 10.4-2, Sheet 3 of 4, “Cost” for Attribute, Land and Land Use, as follows:

BLN occupies approximately ~~188~~ 200 ac. of the approximately 1600 ac. existing BLN site and approximately 1550 ac. for the transmission corridor.

12. Revise COLA Part 3, ER Chapter 10, Table 10.4-3, Sheet 1 of 2, under “**External Costs**” for cost category, Land and Land Use, as follows:

Land and Land Use

Bellefonte Nuclear Plant, Units 3 and 4 (BLN) occupy approximately ~~188~~ 200 ac. of the approximately 1600-ac. existing BLN site and continued use of land for the existing transmission corridor. Impacts related to land use are expected to be SMALL.

ATTACHMENTS:

None.

**RESPONSES TO NRC
INFORMATION NEEDS**

Meteorology (Met)

This enclosure provides the status of the three NRC information needs related to the NRC review of Meteorology (Met) and provides BLN responses to one of these Met Information Needs.

Status of "Met" Information Needs

**NRC Information
Need Number**

Status

- Met-1 Resolved at BLN site audit.
- Met-2 Resolved at BLN site audit.
- Met-3 Partially resolved at BLN site audit; remainder addressed in this enclosure.

NRC Review of the BLN Environmental Report

NRC Information Needs - BLN ER Site Audit Exit Meeting

NRC Environmental Category: ACCIDENTS

During the BLN Environmental Report site audit exit meeting on April 4, 2008, the NRC staff identified the following information need:

Need to meet with appropriate folks in the utility for ...2) addressing issues related to the site proximity to an air quality non-attainment area

BLN INFORMATION NEED: MET-03

BLN RESPONSE:

During the week of March 31 through April 4, 2008, the NRC staff conducted an audit of the BLN site, including a review of the documentation supporting the BLN ER. The NRC meteorology reviewer requested additional information, including identification of the area in Jackson County that is in nonattainment. The Environmental Protection Agency identifies the nonattainment area in Jackson County as U.S. Census 2000 block group 01-071-9503-1 and stipulates that the area is in non-attainment for PM-2.5 (particulate matter with a diameter less than 2.5 micron). The non-attainment area is approximately 10 miles northeast of the BLN site boundary, as shown in the illustration provided as Attachment A to this enclosure.

ASSOCIATED BLN COL APPLICATION REVISIONS:

Revise COLA Part 3, Environmental Report Subsection 2.7.1.3, third paragraph, as follows:

The above classification of Jackson County as nonattainment for PM-2.5 is a result of being included in the AL-TN-GA area, which includes Chattanooga, Tennessee. The EPA identifies the PM-2.5 nonattainment area in Jackson County as U.S. Census 2000 block group 01-071-9503-1. Jackson County is part of the Tennessee River Valley (Alabama) – Cumberland Mountains (Tennessee) Interstate Air Quality Control Region. For Jackson County itself, the levels of all criteria pollutants are well within the EPA air quality standards for 2003 through 2005.

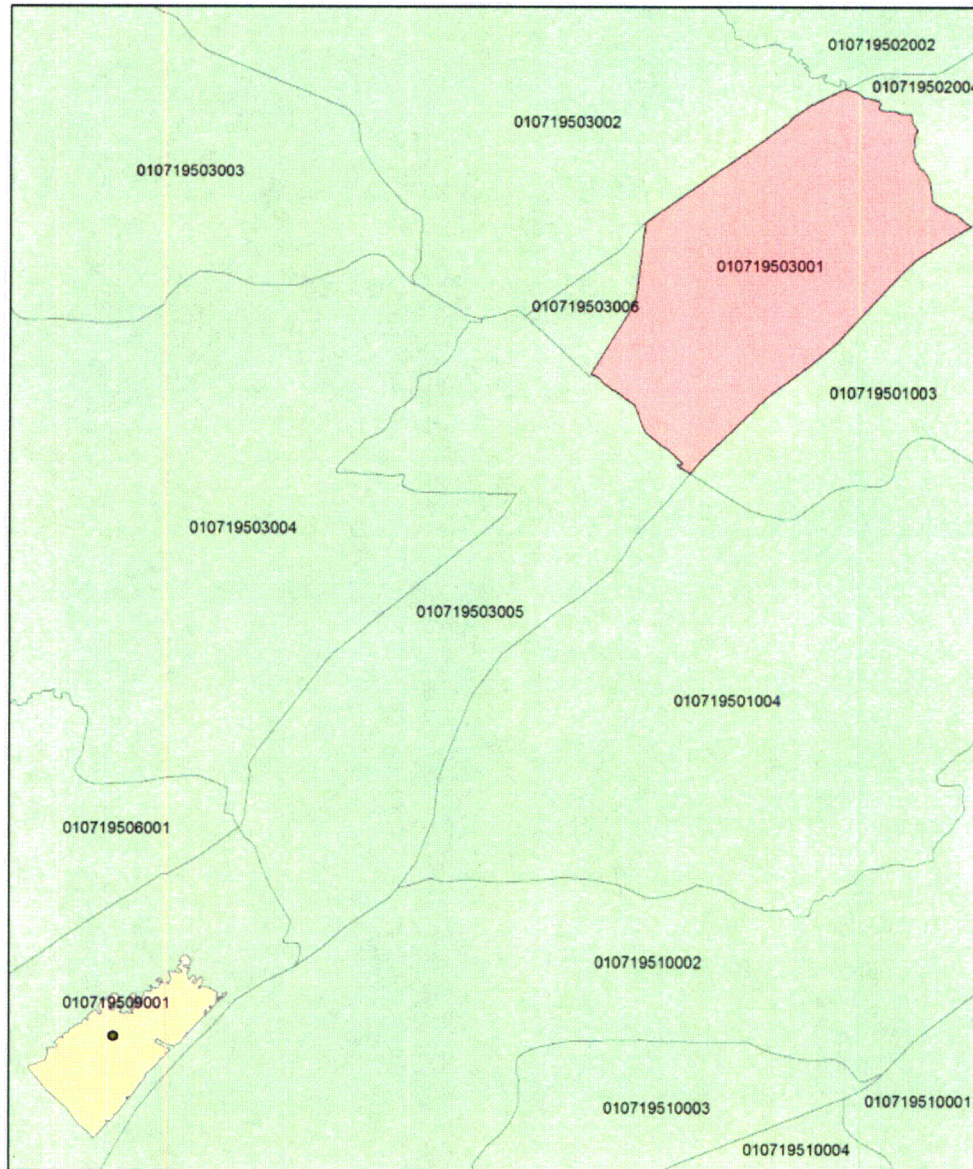
ATTACHMENTS:

The following illustration is provided as Attachment A to this enclosure:

- A. Area of Nonattainment for PM-2.5 in Jackson County, Identified by U.S. Census Bureau Block Group 01-071-9503-1.

**Area of Nonattainment for PM-2.5
in Jackson County
(Identified by U.S. Census Bureau
Block Group 01-071-9503-1)**

Jackson County Census Block Groups



Legend

- Site Center Point
- Bellefonte Property Boundary
- Block Group 010719503001

