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EN-AA-103..0001 Revision 3 Page 1 of 29



ENVIRONMENTAL EVALUATIONS

1. PURPOSE

This gUidance provides Environmental personnel with direction on performing Environmental Evaluations to identify impacts, if any, of proposed configuration changes or work packages. Early identification of environmental impacts can be addressed prior to initiation of configuration changes or work packages to avoid penalties and minimize delays and cost escalation.

2. TERMS AND DEFINITIONS

- 2.1. <u>Configuration Change</u> is defined in EN-AA-103 "Environmental Review."
- 2.2. Environmental Evaluation is defined in EN-AA-103 "Environmental Review."
- 2.3. Environmental Impact is defined in EN-AA-103 "Environmental Review:"
- 2.4. Environmental Review is defined in EN-AA-103 "Environmental Review."
- 2.5. <u>Environmentally Sensitive Area</u> Rivers, streams, wetlands, coastal areas, or areas of land containing an endangered species.
- 2.6. <u>Erosion</u> The detachment and movement of soil or rock fragments by water, wind, ice, or gravity.
- 2.7. <u>Erosion and Sedimentation Control (ESC) Plan</u> A plan that is designed to minimize accelerated erosion and sedimentation. The plan contains a strategy to minimize erosion and prevent off-site sedimentation by containing sediments on-site or passing sediment laden runoff through sediment controls or facilities.
- 2.8. <u>Excavation</u> A cavity formed by boring, digging, quarrying, uncovering, displacing, or relocating soil or rock.
- 2.9. <u>Land Disturbance</u> Construction or other activity which disturbs the surface of the land, including, but <u>not</u> limited to, excavations, embankments, road development, land development, subdivision development, mineral extraction, vegetation removal, and the moving, depositing, or storing of soil, rock or earth.
- 2.10. <u>Major Modification.</u> <u>Expansion or Development</u> Changes to an existing facifity that have the potential to increase emissions or wastes generated by the facility, to impact land usage at the facility, or to reqUire changes to eXisting facility permits.

- 2.11. New Source Review (NSR) A pre-construction permit program for new major stationary sources of air pollution and major modifications to major stationary sources. NSR permits in attainment areas are referred to as prevention of significant deterioration (PSD) permits and permits in non-attainment areas are referred to as non-attainment area (NAA) permits.
- 2.12. Polychlorinated Biphenyl (PCB> Includes any compound of biphenyl and chlorine or any mixture or combination of substances that contain compounds of chlorine and biphenyl.
- 2.13. Release An intentional or unintentional action or omission resulting in the direct or indirect releasing, spilling, leaking, pumping, emitting, emptying or dumping of non-radiological regUlated substances onto the land, into the air or into the water.
- 2.14. <u>Sediment</u> Soil or other **surficial** material transported by surface water as a product of **erosion**.
- 2.15. Sedimentation The process of depositing sediment on the bottom of water bodies.
- 2.16. <u>Unreviewed Environmental Condition.</u> is defined in EN-AA-103 "Environmental Review."
- 2.17. Wetlands Areas that are inundated or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions, inclUding swamps, marshes, bogs and similar areas.

3. **RESPONSIBILITIES**

3.1. Upon receipt of an Environmental Review or after a request for assistance with an environmental review, Site Environmental Personnel are responsible for:

Conducting Environmental Evaluations that identify environmental impacts, regulatory actions, (e.g., permit applications, Agency notifications, licensing changes, recordkeeping changes, etc.), and all environmental conditions or riskS that must be addressed for the proposed activity to proceed;

Communicating environmental impacts, regUlatory actions, and environmental conditions or risks to the individual(s) or group(s) providing or requesting the Environmental Review and, if necessary, to Facility Management and Nuclear Corporate Environmental Staff;

Working with the individual(s) proViding or requesting the Environmental Review to ensure that the scope of the proposed actiVity is understood, environmental impacts are identified, and actions are developed consistent with applicable environmental laws, regulations, permits, and Corporate and Station environmental 'policy and procedures;

Completing studies, notifications. environmental plans. and/or permit applications;

Contacting Regulatory Assurance for submittal of any final studies to the Nuclear Regulatory Commission (NRC) or other environmental agency, as applicable per the Operating License Appendix B, "Environmental Protection PlanlTechnical Specifications" or other requirement.

- 3.2. The responsibilities of the Engineer in charge of a proposed activity are defined in EN-AA-103 and CC-AA-102.
- 3.3. The responsibilities of the Screening Committee are defined in EN-AA-103 and WC-AA-106.

4. **MAIN BODY**

4.1. Environmental Basis

The environmental basis for the site is the collective sum of all information that characterizes the environmental operations of the site (see Figure 1 through Figure 4). The environmental basis consists of commitments to external stakeholders (e.g. permit basis), bounds of environmental analysis presented to the NRC (e.g. licensing basis), and capabilities maintained to respond to environmental conditions beyond the scope of normal operations (e.g. contingency planning basis).

4.2. <u>Environmental Evaluations</u>

- 4.2.1 **IF** an Environmental Review (see EN-AA-103 "Environmental Review") reveals potential environmental impacts, **THEN** the Chemistry Manager or their designee should assess whether sufficient internal resources and expertise exists to complete an Environmental EvaJuation.
- 4.2.2 Site environmental personnel and/or support contractors should interview the individual(s) responsible for the proposed activity and other pertinent personnel and review the plans and specifications for the proposed activity, as necessary; to identify potential environmental impacts. Environmental Evaluations assess the proposed activity in relation to the Environmental Basis for the Station including, but **not** limited to:

Air quality impacts,

Archeological and cultural impacts,

Asbestos Surveys,

Aquatic ecology and endangered species impacts,

Clean Water Act Certifications,

Clean Water Act Section 404 compliance,

Erosion and sedimentation controls,

Flood plain determinations,

Hazardous material handling and storage,

Impingement and entrainment impacts,

National Pollutant Discharge Elimination System (NPDES) impacts,

Polychlorinated biphenyl management,

Resource Conservation Recovery Act (RCRA) impacts,

Safe Drinking Water Act impacts,

Significant Environmental Aspects,

Storage tank impacts,

Stormwater drainage review and quality impacts,

Stream encroachments, dikes and dams.

Superfund Amendments Reauthorization Act (SARA) Title III impacts,

Terrestrial ecology and endangered species impacts,

Thermal Discharge impacts,

Unreviewed enVironmental conditions,

Waste Handling/Disposal impacts.

Wetlands Delineations.

Additional details on these types of Environmental Evaluations can be found in Attachment 4 Proposed activities may have environmental impacts in more than one area. Attachment 2 contains a checklist that may be used to identify potential environmental impacts of proposed projects.

Environmental Evaluation results will be communicated to the originator of the proposed activity. If the Environmental Evaluation concludes that the proposed activity has an environmental impact, the proposed actiVity shall not be initiated until the environmental impact is resolved. Resolution of Environmental Evaluation findings may be in the form of compliance plans, where allowed by regulation.

- 4.2.3 Document the results of Environmental Evaluations and FORWARD to the individual(s) responsible for the proposed activity.
- 4.2.4 If the Environmental Evaluation concludes that the implementation of the proposed activity results in an unacceptable environmental condition or risk, then Site Environmental Personnel should work jointly with the individual(s) responsible for the proposed activity to identify acceptable alternatives or modifications to the proposed activity that resolve the EnvironmentalImpact(s). The proposed configuration change or work package should <u>not</u> be implemented until the EnvironmentalImpact(s) is addressed.

5. DOCUMENTATION

5.1. Environmental Evaluation documents shall be maintained with the Site environmental records per the retention schedule for the affected environmental program area.

6. REFERENCES

- 6.1. Commonwealth of Pennsylvania Department of Environmental Protection, Title 25
 Chapter 92, "National Pollutant Discharge Elimination System Permitting,
 Monitoring and Compliance."
 - Chapter 102, "Erosion Control."

Chapter 105, "Dam Safety and Waterway Management."

Chapter 106, "Flood Plain Management:"

Chapter 109, "Safe Drinking Water."

- 6.2. Delaware River Basin Commission Docket D-69-210CP (LGS)
- 6.3. <u>Exelon Corporate Procedure</u> EN-AC-101-1, "Exelon Environmental Aspects and Impacts Assessment."
- 6.4. Exelon Nuclear Procedure EN-AA-103, "Environmental Reviews."
- 6.5. <u>Federal Emergency Management Agency (FEMA),</u> "Federal Guidelines for Dam Safety: Emergency Action Planning for Dam Owners."
- 6.6. Illinois Administrative Code

Title 17 Part 3700, "Construction in Floodways of Rivers, Lakes, and Streams."

Title 17 Part 3702, "Rules for Construction and Maintenance of Dams."

Title 17 Part 3704, .IRegulation of Public Waters."

Title 17 Part 3706, "Regulations of Construction within the Floodplain."

Title 35 Part 201, "General Provisions [Air Pollution]."

Title 35 Part 202, "Alternative Control Strategies [Air Pollution]."

Title 35 Part 203, "Major Stationary Sources Construction and Modification."

Title 35 Part 211. "Definitions and General Provisions [Air Pollution]."

Title 35 Part 212, "Visible and Particulate Matter Emissions."

Title 35 Part 214, "Sulfur Limitations."

Title 35 Part 215, "Organic Material Emissions Standards and Limitations."

Title 35 Part 216, "Carbon Monoxide Emissions."

Title 35 Part 217, "Nitrogen Oxides Emissions."

Title 35 Part 218, "Organic Material Emission Standards and Limitations for the Chicago Area."

Title 35 Part 220, "Nonmethane Organic Compounds."

Title 35 Part 228, "Asbestos."

Title 35 Part 230, "New Source Performance Standards."

Title 35 Part 232, "Toxic Air Contaminants."

Title 35 Part 237, "Open Burning."

Title 35 Part 240, "Mobile Sources."

Title 35 Part 241, "Clean Fuel Fleet Program."

Title 35 Part 243, "Air Quality Standards."

Tille 35 Part 244, "Episodes [Air Pollution]."

Title 35 Part 245, "Odors."

Title 35 Part 254, "Annual Emissions Report [Air Pollution]."

Title 35 Part 270. "Clean Air Act Permit Program Procedures."

Title 35 Part 275, "Alternate Fuels Program."

Title 35 Part 276, "Procedures to be Followed in the Performance of Annual Inspections of Motor Vehicle Exhaust Emissions."

Title 35 Part 301, "Introduction [Water Pollution]."

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Title 35 Part 302, "Water Quality Standards."
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Title 35 Part 303, "Water Use Designations and Site Specific Water Quality Standards."

Title 35 Part 304, "Effluent Standards."

Title 35 Part 305, "Monitoring and Reporting [Water Pollution]."

Title 35 Part 306, "Performance Criteria [Water Pollution]."

Title 35 Part 307, "Sewer Discharge Criteria."

Title 35 Part 309, "Permits [Water Pollution]."

Title 35 Part 310, "Pretreatment Programs."

Title 35 Part 312, "Treatment Plant Operator Certification."

Title 35 Part 352, "Procedures for Determining Water Quality Based Permit Limitations for National Pollutant Discharge Elimination Discharges."

Title 35 Part 355, "Determination of Ammonia Nitrogen Water Quality Based Effluent Limits for Discharge to General Use Waters."

Title 35 Part 370, "Illinois Recommended Standards for Sewage Works."

Title 35 Part 373, "Third Stage Treatment Lagoon Exemptions."

Title 35 Part 378, "Effluent Disinfection Exemptions."

Title 35 Part 380, "Procedure for the Certification of Operators of Wastewater Treatment Works."

Title 35 Part 391, "Design Criteria for SIUdge Application on Land."

Title 35 Part 601, "Introduction [Public Water Supplies]."

Title 35 Part 602, "Permits [PUblic Water Supplies]."

Title 35 Part 603, "Ownership and Responsible Personnel [Public Water Supplies]."

Title 35 Part 607, "Operation and Recordkeeping [PUblic Water Supplies]."

Title' 35 Part 611, "Primary Drinking Water Standards."

Title 35 Part 615, "Existing Activities in a Setback Zone or Regulated Recharge Area."

Title 35 Part 616, "New Activities in a Setback Zone or Regulated Recharge Area."

Title 35 Part 617, "Regulated Recharge Areas."

Title 35 Part 620, "Groundwater Quality."

Title 35 Part 651, "Introduction and Definitions [Public Water Supplies]."

Title 35 Part 652, "Permits [Public Water Supplies]."

Title 35 Part 653, "Design, Operation and Maintenance Criteria [Public Water Supplies]."

Title 35 Part 654, "Raw and Finished Water Quality and Quantity [Public Water Supplies]."

Title 35 Part 670, "Minimal Hazard Certification [Public Water Supplies]."

Title 35 Part 671, "Maximum Setback Zone for Community Water Supply Wells."

Title 35 Part 680, "Water Supply Operator Certification."

Title 35 Part 702, "RCRA and UIC Permit Programs."

Title 35 Part 703, "RCRA Permit Program."

Title 35 Part 705, "Procedures for Permit Issuance."

Title 35 Part 709, "Wastestream Authorizations."

- Title 35 Part 720, "Hazardous Waste Management System: GeneraL"
- Title 35 Part 721, "Identification and Listing of Hazardous Waste."
- Title 35 Part 722, "Standards Applicable to Generators of Hazardous Waste."
- Title 35 Part 725, "Interim Status Standards for Owners and Operators of

Hazardous Waste Treatment, Storage, and Disposal Facilities."

- Title 35 Part 726, "Standards for the Management of Specific Hazardous Waste and Specific Types of Hazardous Waste Management Facilities."
- Title 35 Part 728, "Land Disposal Restrictions."
- Title 35 Part 729, "Prohibited Hazardous Wastes in Land Disposal Units."
- Title 35 Part 731, "Underground Storage Tanks."
- Title 35 Part 732, "Petroleum Underground Storage Tanks."
- Title 35 Part 733, "Standards for Universal Waste Management."
- Title 35 Part 739, "\$tandards for the Management of Used Oil."
- Title 35 Part 740, "Site Remediation Program."
- Title 35 Part 741, "Proportionate Share Liability."
- Title 35 Part 742, "Tiered Approach to Corrective Action Objectives."
- Title 35 Part 807, "Solid Waste."
- Title 35 Part 808, "Special Waste Classifications."
- Title 35 Part 809, "Nonhazardous Special Waste HaUling and the Uniform Program."
- Title 35 Part 810, "Solid Waste Disposal: General Provisions."
- Title 35 Part 900, "General Provisions [Noise]."
- Title $35\ \text{Part}\ 901$, "Sound Emission Standards and Limitations for Property Line Noise Sources."
- Title 35 Part 951., "Measurement Procedures for the Enforcement of 35 III. Adm. Code gOO & 901."
- Title 35 Part 1420, "General Provisions [Potentially Infectious Medical Waste]."
- Title 35 Part 1421, "Activity Standards [Potentially Infectious Medical Waste]."
- Title 35 Part 1422, "Design and Operation of Facilities [Potentially Infectious Medical Waste]."
- Title 41 Part 160, "Storage, Transportation, Sale and Use of Gasoline and Volatile Oils: Rules and Regulations Relating to General Storage."
- Title 41 Part 170, "Storage, Transportation, Sale and Use of Petroleum and Other Regulated Substances."
- Title 41 Part 180, "Storage, Transportation, Sale and Use of Gasoline and Volatile Oils."
- Title 77 Part 900, "Drinking Water Supply Code."
- Title 77 Part 930, Surface Source Water Treatment Code."

6.7. <u>Illinois Compiled Statutes</u>

- Chapter 20 Section 830, "Interagency Wetland Policy Act."
- Chapter 20 Section 2305, "Department of Public Health Act."
- Chapter 20 Section 2905, "State Fire Marshal Act."
- Chapter 20 Section 3305, "Illinois Emergency Management Agency Act."
- Chapter 20 Section 3410, "tllinois Historic Preservation Act."

Chapter 415 Section 5, "Environmental Protection Act."

Chapter 415 Section 20, "Illinois Solid Waste Management Act."

Chapter 415 Section 25, "Water Pollutant Discharge Act."

Chapter 415 Section 55, "Illinois Groundwater Protection Act."

Chapter 415 Section 60, "Illinois Pesticide Act."

Chapter 415 Section 70, "Hazardous Substances Construction Disclosure Act."

Chapter 415 Section 85, "Toxic Pollution Prevention Act."

Chapter 415 Section 115, "Illinois Pollution Prevention Act."

Chapter 415 Section 130, "Interstate Ozone Transport Oversight Act."

Chapter 430 Section 15, "Gasoline Storage Act."

Chapter 430 Section 30, "Illinois Hazardous Materials Transportation Act."

Chapter 430 Section 50, "Hazardous Materials Emergency Act."

Chapter 430 Section 100, "Illinois Emergency Planning and Community Right to Know Act."

Chapter 520 Section 7, "Illinois Endangered Species Protection Act."

Chapter 525 Section 25, "rllinois Lake Management Program Act."

Chapter 525 Section 45, "Water Use Act of 1983."

Chapter 615 Section 5, "Rivers, Lakes and Streams Act."

Chapter 615 Section 15, "Flood Control Act of 1945."

6.8. New Jersey Administrative Code (N.J.A.C.)

Title 4 - Department of Agriculture 4:24-39, "Soil Erosion and Sediment Control Act."

Title 7 Department of Environmental Protection

Chapter 7, "Coastal Permit Program Rules."

Chapter 7A, "Freshwater Wetlands Protection Act Rules."

Chapter 7E, Coastal Zone Management Rules."

Chapter 10, "Safe Drinking Water Act."

Chapter 13, "Flood Hazard Area Control."

Chapter 14, "Water Pollution Control Act."

Chapter 14A, "Pollutant Discharge Elimination System."

Chapter 18, "Regulations Governing Certification of Laboratories and

Environmental Measures."

Chapter 19, "Water Supply Allocation Permits."

Chapter 20, "Dam Safety Standards."

Chapter 26, "Solid Waste."

Chapter 26G, "Hazardous Waste."

Chapter 27, "Air Pollution ControL"

6.9. New Jersey Permanent Statutes, Title 58 et. seq., "Water and Water Supply."

6.10. Operating License

Appendix S, "Environmental Protection Plan/Environmental Technical Specifications."

Section 3.B (Peach Bottom Atomic Power Station). Final Environmental Statement (FES-OL).

6.11. <u>ntle 25 Pennsylvania Code:</u>

Chapter 91, "General Provisions [Water Resouces]."

Chapter 92, "National Pollutant Discharge Elimination System Permitting, Monitoring and Compliance."

Chapter 93, "Water Quality Standards."

Chapter 102, "Erosion ControL"

Chapter 105, "Dam Safety and Waterway Management."

Chapter 109, "Safe Drinking Water."

Chapter 121, "Generaf Provisions [Air Resources]."

Chapter 122, "National Standards of Performance for New Stationary Sources."

Chapter 123, "Standards for Contaminants."

Chapter 127, "Construction, Modification, Reactivation and Operation of Sources."

Chapter 135, "Reporting of Sources."

Chapter 139, "Sampling and Testing."

Chapter 245, "Administration of the Storage Tank and Spill Prevention Program."

Chapter 262a, "Standards Applicable to Generators of Hazardous Waste."

Chapter 265a, "Interim Status Standards for Owners and Operators of

Hazardous Waste Treatment, Storage and Disposal Facilities."

Chapter 284, "Infectious and Chemotherapeutic Waste."

Chapter 287, "Residual Waste Management - General Provisions."

Chapter 299, "Storage and Treatment of Residual Waste."

Chapter 301, "General Provisions [Certification of Sewage Treatment Plant and Waterworks Operators]."

Chapter 303, "Certification of Operators."

6.12. Pennsylvania Storage Tank and Spill Prevention Act 32 Section 6021.901

6.13. <u>Susquehanna River Basin Commission Dockets</u>

PBAPS

TMI

6.14. <u>United States Code of Federal Regulations (CFR)</u>

Department of Agriculture, Title 7 CFR 656.2, "Archeological and Historical Laws and Executive Orders applicable to NRCS-assisted programs."

Nuclear Regulatory Commission, Title 10 CFR 51: Early Site Permits; Standard Design Certifications; and Combined Licenses for Nuclear Power Plants.

Occupational Safety and Health Administration Title 29 CFR Part 1910, "Occupational Safety and Hearth Standards."

Army Corps of Engineers, Title 33 CFR

Part 153, "Control of Pollution by Oil and Hazardous Substances, Discharge Removal."

Part 321, "Permits for Dams and Dikes in Navigable waters of the U.S."

Part 323, "Permits for Discharges of Dredged or Fill Material into waters of the U.S."

Part 324, "Permits for Ocean Dumping of Dredged Material."

Part 325, "Processing of Department of the Army Permits."

Part 330, "Nationwide Permit Program."

Environmental Protection Agency, Title 40 CFR

Part 50, "National Primary and Secondary Ambient Air Quality Standards."

Part 52, "Approval and Promulgation of Implementation Plans."

Part 60, "New Source Performance Standards."

Part 61, "National Emission Standards for Hazardous Air Pollutants."

Part 63; "National **Emission** Standards for Hazardous Air Pollutants for Source Categories."

D 104 "0 "

Part 64, "Compliance Assurance Monitoring."

Part 65. "Consolidated Federal Air Rule."

Part 68, "Chemical Accident Prevention Provisions."

Part 75, "Continuous Emission Monitoring."

Part 80, "Regulation of Fuels and Fuel Additives."

Part 81, "Designation of Areas for Air Quality Planning Purposes."

Part 82, "Protection of Stratospheric Ozone."

Part 85, "Control of Air Pollution from Mobile Sources."

Part 88, "Clean Fuel Vehicles."

Part 110, "Discharge of Oil."

Part 112, "Oil Pollution Prevention...

Part 116, "Designation of Hazardous Substances."

Part 117, "Determination of Reportable Quantities for Hazardous Substances."

Part 121, "State Certification of Activities Requiring a Federal License or Permit."

Part 122, "The National Pollutant Discharge Elimination System."

Part 125, "Criteria and Standards for the National Pollutant Discharge Elimination System."

Part 129, "Toxic Pollutant Effluent Standards."

Part 131, "Water Quality Standards."

Part 132, "Water Quality Guidance for the Great Lakes System."

Part 133, "Secondary Treatment Regulation."

Part 136, "Guidelines Establishing Test Procedures for the Analysis of Pollutants."

Part 141, "National Primary Drinking Water Regulations."

Part 142, "National Primary Drinking Water Regulations Implementation."

Part 143, "National Secondary Drinking Water Regulations."

Part 171, "Certi-fication of Pesticide Applicators."

Part 204, "Noise Emission Standards for Construction Equipment."

Part 230, "Section 404(b)(1) Guidelines for Specification of Disposal Sites for Dredged or Fill Material."

Part 232, "404 Program Definitions: Exempt Activities not Requiring 404 Permits."

Part 260, "Hazardous Waste Management System: General."

Part 261, "Identification and Listing of Hazardous Waste."

Part 262, "Standards Applicable to Generators of Hazardous Waste."

Part 265, "Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities."

Part 266, "Standards for the Management of Specific Hazardous Waste\$ and Specific Types of Hazardous Waste Management Facilities."

Part 268, "Land Disposal Restrictions."

Part 280, "Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks."

Part 302, "Designation, Reportable Quantities and Notification."

Part 355, "Emergency Planning, and Notification."

Part 370, "Hazardous Chemical Reporting: Community Right-to-Know."

Part 401, "General [Pretreatment] Provisions."

Part 403, "General Pretreatment Regulations for Existing and New Sources of Pollution."

Part 423, "Steam Electric Power Generating [Pretreatment] Point Source Category."

Part 503, "Standards for the Use and Disposal of Sewage Sludge."

Part 749, "Water Treatment Chemicals."

Part 761, "Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions."

Part 1068, "General Compliance Provisions for Non-Road Programs."

Department of Transportation Title 49 CFR

Part 130, "Oil Spill Prevention and Response Plans,"

Part 171, "General Information, Regulations and Definitions."

6.15. United States Code

7 USC 136 & 16 USC 460 et seq., "Endangered Species Act." 15 USC 2601, "Toxic Substances Control Act."

- 16 USC 469, "Preservation of Historical and Archeological Data Threatened
- by Dam construction or Alterations of Terrain."
- 33 USC 1251 et seq., "Clean Water Act."
- 33 USC 2702-2761 "Oil Pollution Act."
- 42 USC 300, "Safe Drinking Water Act."
- 42 USC 321 et seq., "Resource Conservation and Recovery Act."
- 42 USC 4321-4347, as amended, "National Environmental Policy Act."
- 42 USC 4910, "Noise Control Act."
- 42 USC 7401 et seq., "Clean Air Act."
- 42 USC 9601 et seq., "Comprehensive Environmental Response,

Compensation and Liability Act (Superfund)."

- 42 USC 9601 et seq., "Superfund Amendments and Reauthorization Act:'
- 42 USC 11011 et seq., "Emergency Planning and Community Right-to-Know Act."
- 42 USC 13101 & 13102, et seq., "Pollution Prevention Act."

7. **ATTACHMENTS**

- 7.1. Attachment 1 Environmental Evaluation Form Example (A Word Version of this form is available in the EN Forms folder under Chemistry under NGG Procedure Project In the **Public** Folders in Outlook.)
- 7.2. Attachment 2 Checklist for Identifying Potential Environmental Impacts
- 7.3. Attachment 3 Environmental Program Areas and Applicable Regulatory Standards
- 7.4. Attachment 4 Environmental Basis

8. **FIGURES**

- 8.1 Figure 1 Environmental Basis
- 8.2 Figure 2 Environmental Applicability of Proposed Change
- 8.3 Figure 3. Preparation of Environmental Evaluation

AITACHMENT 1 Environmental Evaluation Form - Example Page 1 of 2

•	Tude Total
Preparer:	Oraanizatlon: I
Proposed. Activity:	
	nge increase environmental impacts from noise levels at the site boundary or d air pollutants (e.g., dusts, vapors, asbestos, etc.) hazardous waste, solid waste, or
	nge increase the potential to release any chemical (e.g., gas, oil, PCB, hydraulic fluid, environment or Introduce new chemicals to the Site?
	nge disturb land, streams or wetlands or modify stormwater drainage systems that rmwater runoff or increase the sediment loading of stormwater runoff?
4. Will the proposed charges No Explain:	nge affect the existing capability to control, treat, or monitor release to the environment?
5. Will the proposed characteristics effluents. emissions, Yes No Explain:	nge result in a physical or chemical change in the characteristics of discharges, or withdrawals?
a hazardous or regUl	nge result in permanent or temporary storage (for re-use , disposal, or offsite transfer) of ted chemical or waste outside of established handling facilities: or reduce the margin of t (i.e., increase the potential of a release to the environment?)
operation, air emission	nge result in an alteration to a plant system or component, (e.g., wastewater treatment in filter, etc.) regUlated by an environmental permit, surface water use or discharge is a modification to an environmental permit?
8. Will the proposed charsystem to be opened Yes No Explain:	nge alter the drinking water treatment system or cause the drinking water distribution

ATTACHMENT 1 Environmental Evaluation Form - Example Page 2 of2

	change be consistent with the Facility Operating License, Appendix B "Environmental Environmental Technical Specification" and <i>I</i> or the Final Environmental Statement by the
Yes N Explain:	o
10. Does the proposing Section 10. Does the proposing No. 10. Explain:	ed activity affect a significant environmental aspect? o
11. Does the propose Yes NExplain:	ed activity modify an existing environmental permit? o
12. Does the propose Yes NExplain:	ed activity involve a change to Environmental Technical Specifications? o
13. Does the propose Statement? Yes N Explain:	ed activity involve an environmental impact different than analyzed in the Final Environmental
14. Does the propose Yes NExplain:	ed activity require NRC approval in accordance with 10 CFR 50.59? o
Technical review of the	e folloWing documents was performed:
Review:	
Preparerfs1	Date
Peer Revlewerfsl	I Date
Comments:	



ATTACHMENT 2 Checklist for Identifying Potential Environmental Impacts Page 1 of2

This checklist provides questions and examples that, when answered, may indicate areas of possible environmental impact. The list is not all-inclusive and is meant to compliment the checklist of EN-AA-103 Attachment 1. The judgment of the Environmental Subject Matter Expert is necessary to determine whether all potential impacts have been identified.

Aspect			Complete	N/A
1.	Identify all relevant laws and regulations (see Attachment 3)			
2.	Identify all current permits, licenses and certificates (including contractual, regulatory, or other binding commitments) made with a government agency or Non-Governmental Organization (NGO):			
		The scope, timing and impact of the proposed activity are consistent with permit modifications and commitments		
		b. New licenses, permits or certificates have been identified		
		c. The compliance record/history of the proposed activity has been evaluated		
		d. The proposed operating plan includes consideration of potential limits Imposed in permits or commitments		
		e. Agency and NGO notification has been evaluated		
3.	3. Identify all liabilities created or retained by the proposed activity			
4.	. Identify all options to mitigate environmental impacts			
5.	lden	tify opportunities to enhance environmental performance for:		
		a. greenhouse gas emission reductions		
		o. increased use of renewable energy		
		c. increased energy efficiency		
		d. reduced solid and liquid waste generation		
		e. improved water quality		
	1	decreased water consumption/use		
		g. reuse of preViously-disturbed land instead of virgin (greenfield) land		
		n. adequate controls to minimize environmental non-compliances		
6.	Inclu	de an assessment of past environmental performance in contractor ction		

ATTACHMENT 2 Checklist for Identifying Potential Environmental Impacts Page 2of2

7. Include the following in contracts for services that may impact the environment:			
	a.	clarification of vendor training and approval of vendor training content	
	b.	environmental expectations that are clearly stated in contract documents	
	C.	communication expectations between vendor, project manager and Environmental SME	
	d.	appropriate indemnification and/or insurance requirements in contracts	

ATTACHMENT 3 Environmental Program Areas and Applicable Regulations Page 1 of 2

Program Area	Code of Federal	New Jersey	Pennsylvania	illinois
Aspect	Regulations	Regulations	Regulations	Regulations
Air Emissions	40'CFR 50,52,64,	NJAC 7:27	25 PAC§121-	35 IAC 201-203,
	65.70.81		143	211-218, 220. 237.
				243-244 , 254. 270
New Source	40CFR60	NJAC 7:27-18	25 PAC §122	35 IAC 230
Performance Standards	40.0ED04.63	N IAC 5:16 0:60	05 DAO \$404	415 ILCS '5/9
 Hazarqous Air Pollutants Motor Vehicle Diesel and 	40 CFR61, 63 40 CFR BO	NJAC 5:16, 8:60 NJAC 7:27-14.	25 PAC §124 25 PAC § 129	35 IAC 228 232 35 IAC 215.218
Gasoline Storage	40CFR BU	15 NJAC 7:27-14.	25 PAC §129	35 IAC 215.216
Ozone Depleting	40CFRB2	NJAC 7:13.6	N/A	N/A
Substances	10011132	110/10/110.0	14//	14/74
Mobile Sources	40 CFR B5. 88,	NJAC 7:27	25 PAC§126	35 IAC 240-241.
	1068		-	275,276
Odors	N/A	NJAC 7:27-5	25 PAC §123.31	35· IAC 245
Noise	40 CFR 204	NJAC7:29	N/A	35 IAC 90D-901. 951
	42 USC 4910			
Water Oischarges	40 CFR 116-117,	NJAC 7:14A	25 PAC §92-93	35 IAC 301. 303,
	121			312,370,3BO
Oil Pollution/Spill	40 CFR 110	NJAC 7:1.E	25 PAC§245	4151LCS 25
Prevention Control and Countermeasure	40 CFR 112			
National Pollutant	40 CFR 121, 122	NJAC7:14A	25 PAC §92	35 IAC 305, 309.
Discharge Elimination	40 01 10 12 1, 122	NJAC7.14A	20 FAC 932	310,373
System				010,070
Water Quality Limits and	40 CFR 116. 125,	NJAC 7:14A	25 PAC §93	35 IAC 302. 304.
Standards	129.131-133.136,		3 3	307,352.355.378
	401-403, 423			
Intake Structures	33 USC 1251			35 IAC 306
Stormwater	40 CFR 122	NJAC 7:8	25PAC §111	N/A
Land Application of	40 CFR503	NJAC 7:14A-20	25 PAC §271,	35 IAC 391
Sewage Siudae	40 OFD 4000	NJAC 7:7A	275	47.14.0.0700.0704
Wetlands Encroachment, Dredge	10 CFR 1022 18 CFR 725	NJAC /:/A	25 PAC §105	17 IAC 3700. 3704, 3706.3708
and Fill	33 CFR 323, 324,			20 ILCS 830
ana i iii	325.330			20 1200 000
	40 CFR 230. 232			
Dikes and Dams	33CFR 321	NJAC 7:20	25 PAC §105	17 IAC 3700. 3702
			,	6151LCS 5
Drinking Water	40 CFR 141,143	NJAC 7:10	25 PAC §109	35 IAC 601-611,
				651-654,680
	7.7/4		XT/4	77 IAC 900, 930
Groundwater	N/A	NJAC 9-6. 14A	N/A	35 IAC 615-620,
				670-671

ATTACHMENT 3 **Environmental** Program Areas and Applicable Regulatory Standards Page 2 of 2

Program Area	Code of Federal	New Jersey	Pennsylvania	Illinois
Aspect	Regulations	Regulations	Regulations	Regulations
Land Management	NA	NA	NA	N/A
Hazardous Waste	40 CFR 260-262 , 265-268	NJAC 7:14A, 7:26.7:26G	25 PAC §260a- 262a, 266a, 268a.287.299	35 IAC 702-703, 705-722, 725-729
Mixed Waste'	40 CFR266	N/A	N/A	35 IAC 726
Universal· Waste	40 CFR273	NJAC 7:26A-7	25 PAC §266b	35 IAC 733
Medical Waste	NA	NJAC 7:26-3A	25 PAC 284	35 IAC 1420-1422
Special/Residual Waste	40 CFR 240-258	NJAC 7:26, 7:26A	25 PAC 287,299	35 IAC B07-810
Used Oil	40 CFR279	NJAC 7:26, 7:26A,7:27	25 PAC §266a, 287	35 IAC 739.
Storage Tanks	40 CFR280	NJAC 7:1E, 7:14B	25 PAC§245	41 IAC 160-180 35 IAC 731-732
Property Transfer	42 USC 9601			
Chemical Management	40 CFR 117, 302	NJAC 7:26	25 PAC §301- 303,307	N/A
Chemical Accident Prevention	40 CFR68			
Pesticides	40 CFR 171			
Emergency Planning and Notification	40 CFR 355	NJAC 7:1G		430 ILCS 100
Community Rlght-to- Know	40 CFR 370, 372	NJAC8:59	34 PAC §305	430 ILCS 100
Water Treatment Chemicals	40 CFR 749			
PCBs	40 CFR 761	NJAC 7:26	25 PAC§273, 287,299	N/A
Emergency Response, Site Remediation	29 CFR 1910.120	NJAC 7:31	34 PAC§305, 307	35 IAC 740-742 4151LCS 70
Hazardous Materials Shipping	49 CFR 171-180	NJAC 16:49, 12:205	67 PAC §403	430 ILCS 30 430 ILCS 50
Operating Licel1se	10 CFR 50	Appendix B	Appendix B	Appendix B
Other				
Endangered Species	7 USC 136 16 USC 460			520 ILCS 7
Historical and Archeological Resources	7 CFR 656.2			

Environmental Basis

Page 1 of7

- 1. Air Quality Evaluation Equipment or processes that emit air pollutants must be considered in the permitting of existing operations, the design of new processes, and changes in eXisting operations that alter air emissions. For example, temporary generators are needed on site for the proposed activity, they must be addressed through the appropriate State Permitting Sections (35 IAC 201.142 and 201.152; N.J.A.C. 7:27 Subchapter 22; 25 PA Code 127.1).
- 2. Archeological and Cultural Evaluation When disturbing ground at locations <u>not</u> previously disturbed. precautionary measures shall be taken to ensure that sites listed or eligible for listing in the National Register of Historic Places (7 CFR 656.2 and 16 USC 469) are not impacted.
- 2.1. Review the FES-OL and supplements, FES-CP, Environmental Report to the NRC and supplements, and/or Appendix B to Technical Specifications to obtain information pertaining to the archeological significance of the location where ground will be disturbed.
- 2.2. If the document review indicates the NRC has previously evaluated the location where ground will be disturbed as <u>not</u> significant, **then <u>no</u>** further action is needed. Otherwise, contact the State Historic Preservation Office for-gUidance on how to proceed prior to initiating the ground disturbance.
- 3. Asbestos Survey Each employer who has a workplace or work operation shall ensure that a "competent person" conducts an exposure assessment immediately before or at the initiation of the operation to ascertain expected asbestos exposures during that operation. The assessment must be completed in time to provide information necessary to assure that all control systems planned are appropriate for that operation and will work properly (29 CFR 1926.1101).
- 4. Aquatic Ecology and Endangered Species Evaluation The U.S. Army Corps of Engineers (ACOE), U.S. Fish and Wildlife Service, Illinois Environmental Protection Agency (IEPA), New Jersey Department of Environmental Protection (NJDEP), Pennsylvania Department of Environmental Protection (PADEP) or county conservation district may determine that a proposed earth-disturbing actiVity will adversely impact an endangered or threatened species or critical habitat. The likelihood of such species or habitats occurring in the affected area should be determined prior to commencing the land disturbance. Agencies or county conservation districts shall be consulted on ways to avoid or prevent impacts to any species or habitats identified. If impacts cannot be avoided or prevented, a demonstration on how the impacts will be minimized shall be prepared according to State and Federal laws pertaining to the protection of threatened or endangered species and their habitat (16 USC Chapter 35; 25 PA Code 102.6; 520 ILCS 10),

Environmental Basis

Page 2 of?

Effects on threatened or endangered aquatic species must be considered prior to disturbing riparian sediments or increasing water withdrawals above previously-evaluated levels.

- 5. Clean Water Act Certification For activities involving Federal licenses or permits, including but not limited to construction or operations that may result in discharges to navigable waters, the State or interstate water pollution control agency having jurisdiction over the navigable waters in which the discharge originates or will originate, must certify to the Federal licensing or permitting agency that the discharge will comply with the applicable provisions of sections 301, 302, 303, 306, and 307 of the Clean Water Act, as amended (33 U.S.C. ss/1251 et seq.). This may be done through the issuance or revision of an NPDES permit. In cases where NPDES permits or permit-revisions are not needed, a Section 401 Certification may be needed. The State water pollution control agency should be consulted to determine if Clean Water Act certification is needed.
- 6. Clean Water Act Section 404 Evaluation Under 33 U.S.C. 401, et seq., the ACOE issues permits to prevent unauthorized obstruction or alteration of navigable waters of the United States. The most frequently exercised authority is contained in Section 10 (33 U.S.C. 403), which covers construction, excavation, or deposition of materials in, over, or under such waters, or any work that would affect the course, location, condition, or capacity of those waters. The authority is granted to the Secretary of the Army. Other permit authorities in the Act are Section 9 for dams and dikes, Section 13 for refuse disposal, and Section 14 for temporary occupation of works built by the United States.
- 7. Erosion Control- Land disturbance activities shall be conducted to prevent accelerated erosion and the resulting sedimentation (40 CFR 122.26; NJAC 7:7A-2.2; or PA Code 25 Chapter 102).
- 7.1. Erosion and Sedimentation Control (ESC) Plans and/or stormwater permits (Section 4.13) may be required prior to disturbing the following acreages:
- 7.1.1. Illinois -- 40 CFR 122.26 is incorporated by reference (35 IAC 301.442).
- 7.1.2. New Jersey ESC plan approval is required in New Jersey if an earthmoving activity disturbs more than 5,000 square feet of the surface area for the accommodation of construction for which the State Uniform Construction Code requires a construction permit. Proposed activities impacting waters of NJ (wetlands, rivers, streams, and lakes) or the shorelines must obtain water obstruction or encroachment permits (NJAC 7:7A-2.2).

Environmental Basis

Page 3 of?

- 7.1.3. Pennsylvania An ESC plan is required for any activity that results in a total earth disturbance of 5,000 square feet. A permit must be obtained prior to commencing earthmoving activities disturbing over 5 acres (PA Code 25 Chapter 102). Proposed activities, which disturb five or more acres, must obtain an NPDES permit for storm water discharges associated with construction activities. Proposed activities that change, expand or diminish the course, current or cross section of a watercourse, floodway, or body of water must obtain water obstruction and encroachment permits (PA Code 25 Chapter 105). The ESC Plan must be approved by the County Conservation District.
- 7.2. A copy of the ESC Plan must be available for inspection at the site of the land disturbance. The primary objective of the plan is to have methods in place to control runoff and water discharges to prevent accelerated erosion and sedimentation in any nearby water body. A Professional Engineer must certify the ESC plan.
- 7.3. Local construction permits may also be required for construction activities. ESC Plan approval from the local conservation district, county, township, or municipality may be a requirement to obtaining construction permits. Notification to local authorities may also be required prior to construction activities.
- 8. Flood Plain Determination Areas that have been identified by the Federal Emergency Management Agency (FEMA) as being SUbject to inundation by a 100-year flood are flood hazard areas. Areas subject to inundation by a 100-year flood are identified in flood insurance studies and on maps provided by FEMA. No person may construct, modify, remove, destroy, or abandon a highway obstruction or an obstruction in a floodplain without first applying for and obtaining a written permit from the Department (25 PA Code 106.11).
- 9. Hazardous Material Handling and Storage HazMat Pre-Incident Plans, Spill Prevention, Control and Countermeasure Plans, Risk Management Plans, and Stormwater Pollution Prevention Plans may specify hazardous material handling and storage areas. Proposed changes to hazardous material handling and storage should be evaluated against these plans to determine if plan revisions are necessary.
- 10. Impingement and Entrainment The USEPA has finalized the rule implementing .Section 316(b) of the Clean Water Act for existing cooling water intakes on lakes, rivers, estuaries, and oceans. The rule for existing cooling water intakes imposes performance standards requiring that plant operations reduce fish impingement mortality by 80 to 95 percent and entrainment of fish eggs and larvae in the cooling water system by 60 to 90 percent. Changes in the characteristics of water withdrawals from waters of the Nation (e.g. increasing the intake velocity, changing structural components of the intake, etc.) must be evaluated for potential permitting

Environmental Basis

Page 40f7

issues related to the 316(b) implementation rule and NRC notification per the Facility Operating, License, Appendix B, Environmental Protection Plan.

- 11. National Pollutant Discharge Elimination System (NPDES) Point Source Review The NPDES program requires permits for the discharge of "pOllutants" from any "point source" into "waters of the United States." The terms "ponutant", "point source" and "waters of the United States" are defined in 40 CFR 122.2 (35 IAC 309.102; N.J.A.C. 7:14A-2.4; 25 PA Code 92.2(b)). Activities which involve an increase of existing pollutants in process effluents or the introduction of new pollutants to process effluents must be evaluated for potential permitting and NRC notification per the Facility Operating License, Appendix B, Environmental Protection Plan.
- 12. Polychlorinated Biphenyl (PCB) Management The use, storage, marking, remediation, transportation and disposal of material or equipment containing PCB or contaminated with PCB is regulated by the Toxic Substances Control Act (15 USC 2601) and 40 CFR 761. An evaluation should be conducted to determine if the proposed activity will invorve the relocation or removal of any material or equipment containing PCB or contaminated with PCB. Transformers, capacitors and other electrical equipment with dielectric fluid may contain PCB. Florescent light ballasts may contain PCB in the potting material. In the past, PCB were also used in ceiling tile coatings, and certain painted surfaces, hydrauUc fluids, lubricants, heat transfer fluids, and insecticides. Material manufactured prior to July 2, 1979 may contain PCB. Material manufactured after July 2, 1979 may also contain PCB if it was exposed to PCB or retrofilled with a PCB-containing substance.
- 13. Resource Conservation Recovery Act (RCRA) Review An evaluation should be conducted to determine if the proposed activity will result in the generation of regulated wastes <u>not</u> listed on the Form 8700-12 Notification of Regulated Waste Activity for the Facility, the notification for conditional exemption for the storage and treatment of mixed waste, and the notification for conditional exemption for the transportation and disposal of mixed waste. Additionally, the Part A Interim Status application, the Interim Status Waste Analysis Plan, the Hazardous Waste Contingency Plan, and the Part A Interim Status Closure Plan may need to be amended, as applicable (40 CFR 262 and 264). If the type of regUlated waste activity changes at the facility, a revised Form 8700-12 shall be submitted to the USEPA and affected plans and applications shall be updated.

Environmental Basis

Page 5 of?

- 14. Safe Drinking Water Act Review The Safe Drinking Water Act (42 USC sis 300f et seq.) was established to protect the quality of drinking water. The Act focuses on all surface water or underground water sources, actually or potentially designed for drinking use. For Facilities that supply drinking water, compliance with the Act includes complying with well-head protection standards, monitoring drinking water purity and meeting primary (health-related) standards. States may also require attainment of nuisance-related secondary standards. Activities that require opening the drinking water system for connection, maintenance, or inspection are subject to disinfection to maintain drinking water purity.
- 15. Significant Environmental Aspects (SEA) Proposed activities that affect processes contributing to or controlling SEA must be evaluated for potentially unacceptable impacts on the SEA. Unacceptable impacts may be in the form of missed objectives and targets, delays or disruptions in improvement plan implementation, reduced effectiveness of control or monitoring equipment, or elevated risk as scored using EN-AC-101-1 "Exelon Environmental Aspects and Impacts Assessment."
- 16. Storage Tank Review Registration, notification or permitting may be required to install, remove or change the contents of storage tanks. Underground storage tanks require special consideration because of cathodic protection and leak detection systems that are mandated by r.egulation. Storage tank review shall also include the piping systems associated with the tank(s).
- 17. Stormwater Drainage Review and Quality Assessment General Storm Water permits are required for any construction activity including clearing, grading, and excavation operations that result in the disturbance of more than one acre of total land area. Construction activity also includes the disturbance of less than one acre of total land area that is a part of a larger common plan of development or sale if the larger common plan will ultimately disturb more than one but less than five acres or more (40 CFR 122.26(c». Permits must be received before qualifying land disturbances can commence.

Environmental Basis

Page 6 of 7

- 17.1. A stormwater assessment should be conducted if any activity involves modification or extension of stormwater drainage systems, including pipes, open channels, and storage basins. These changes, in addition to changes in chemical handling and storage, should be evaluated with respect to the Facility Stormwater Pollution Prevention Plan.
- 18. Stream Encroachment Determination Proposed activities that place an encroachment or obstruction within a stre.am channel encroachment line shall have permits as required. Activities that require permits when conducted within encroachment lines include the removal or deposition of material, any alteration of the land or watercourse, construction of structures, filling, dredging, clearing, grubbing, grading, piping, culverting, channelizing, diverting, damming, dewatering, and any other activity that temporarily or permanently alters the character of the floodplain or watercourse. Additionally, major repair of structures that existed before the stream channel encroachment lines were established may also require a permit (17 IAC 3706.720; NJAC 7:13.4; 25 PA Code 105).
- 19. Superfund Amendments Reauthorization Act (SARA) Title III Evaluation SARA Title III, also known as the Emergency Planning and Community Right-to-Know Act (EPCRA), creates a cooperative effort among government, business, and the pUblic to disclose potential hazards and develop prevention and preparation plans to manage chemical emergencies. SARA Title tit requires facilities that manufacture, process, or store certain hazardous or toxic chemicals above established thresholds to annually report the presence of these chemicals to state and local governments and to report any accidental releases on a timely basis (40 CFR 312).
- 19.1. A SARA Title III evaluation shall determine if the proposed configuration change or construction activity will include the storage or use of hazardous chemicals at the Facility in amounts above the established reporting thresholds that apply to:
- 19.1.1. Hazardous substances, or hazardous chemicals in quantities equal to or greater than 10,000 pounds, and/or
- 19.1.2. Extremely hazardous substances in quantities equal to or greater than 500 pounds, or the threshold planning quantity, whichever is less.
- 19.2. If hazardous chemicals will be stored in quantities equal to or above the threshold planning quantities, the facility should organize, **analyze** and disseminate the resulting information on hazardous chemicals to local governments and the public using the SARA Tier II forms.

Revision 3 Page 25 of 29

AITACHMENT 4

Environmental Basis

Page 7 of 7

- 20. Unreviewed Environmental Conditions Where applicable, Environmental Protection Plans (Operating License Appendix B) establish the total environmental information conected and evaluated for the purpose of obtaining permits, obtaining a NRC operating license, and complying with environmental regUlations as the Environmental Basis for the Station (Figures 2,3, and 4). Changes in Station design or operation or the performance of tests or experiments **not** enveloped by the bounds of the Environmental Basis for the Station constitute Unreviewed Environmental Conditions that must be evaluated prior to the initiation of the change in **Station** design or operation or the performance of the test or experiment.
- 21. Waste Handling and Disposal Evaluation –If the proposed work package or configuration change will increase the short term or long term quantity of waste generated (other than normal refuse), or result in the generation of waste not previously stored or disposed, an evaluation of the waste shall be made for container compatibility and appropriate staging location. Approvals shall also be secured from acceptable disposal outlets prior to shipment off site.
- 22. Wetlands Delineation A review of the area affected by the proposed activities is needed to determine if any streams, wetlands, or environmentally sensitive areas are located on or immediately adjacent to the affected area.

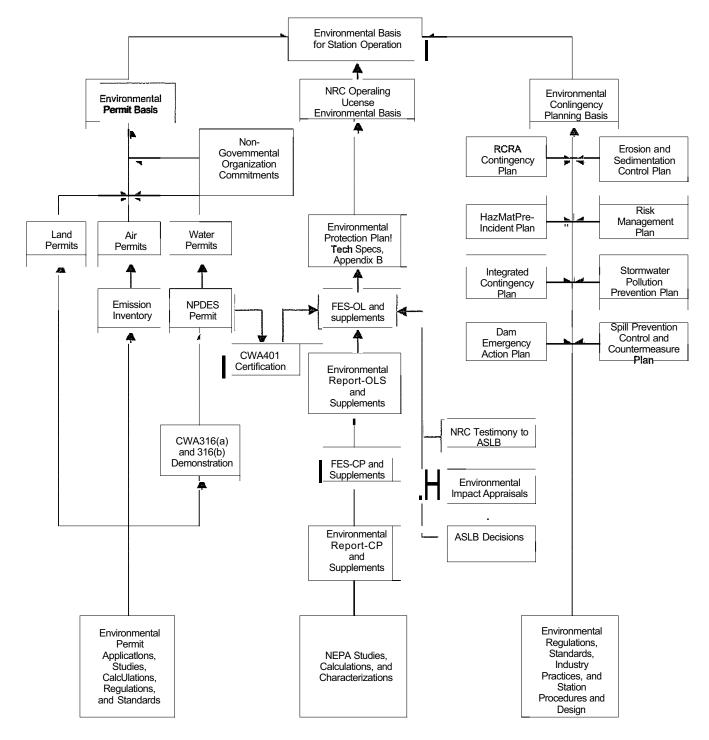
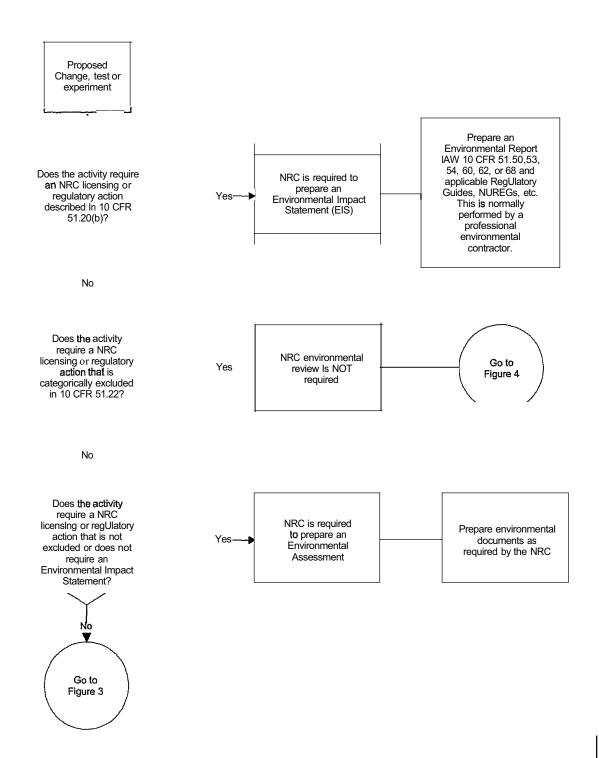
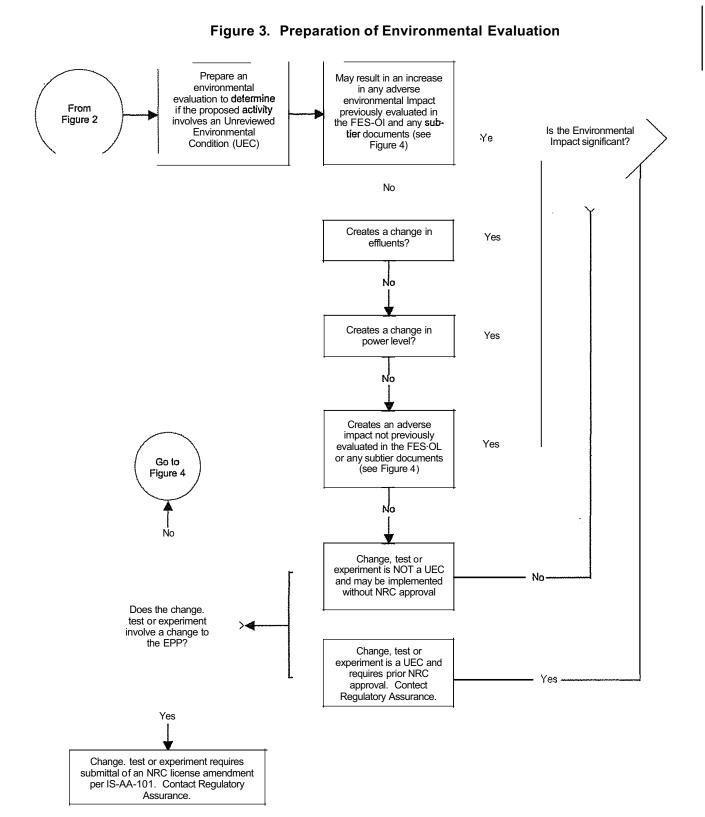


Figure 1. Environmental Basis

NOTE: Some environmental basis elements are not applicable to all Sites.

Figure 2. Environmental Applicability of Proposed Change





regulations affected?

Change. test or experiment is bounded by existing pennits. Implement the

change.

Figure 4. Screening Unreviewed Environmental Conditions

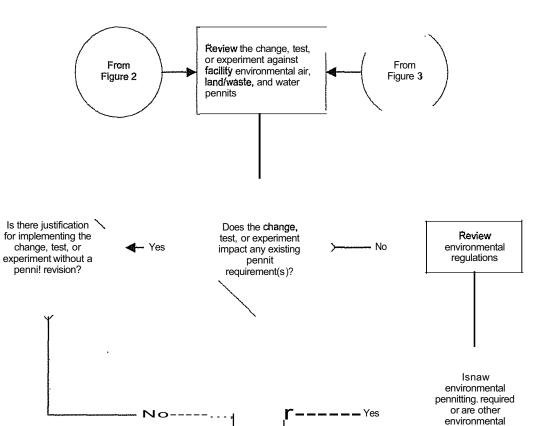
Yes

Change, test or experiment

requires regulatory concurrence

prior to implementation. Contact

Nuclear Environmental.



Creates an adverse impact not

previously evaluated in the FES-

OL or any subtier documents.

Contact Nuclear EnVironmental,