

PMSTPCOL PEmails

From: Paul Kallan
Sent: Tuesday, March 25, 2008 2:24 PM
To: 'HLN@Exchange.EXPO'
Subject: Fwd: RE: STP Dewatering and Excation

fyi

Paul

>>> Paul Kallan 3/20/2008 10:55 AM >>>
Will do...

Paul

>>> William Burton 3/20/2008 10:50 AM >>>
Of course, Greg's response in hearing file.

>>> "Gibson, Gregory T" <gtgibson@STPEGS.COM> 03/20/2008 10:02 AM >>>

Paul,

Thank you for the opportunity to provide clarification. Comments below
(Note: << >> is used to denote the context from your original email):

Item 2:

<<Russ Kiesling has already contacted the USACE. STPNOC will be submitting a wetlands validation package to the USACE in the next 4 to 5 weeks>>

We will be submitting a Preliminary Wetland Delineation Report and we will request a Delineation Validation from the USACE.

<<A draft map that will indicate perceived jurisdictional and non-jurisdictional wetlands is being prepared by Mr. Kiesling. This map will be provided with the validation package and STPNOC offered to provide a copy of the draft map to the NRC.>>

The draft map does not include jurisdictional wetlands. The Preliminary Wetland Delineation document will do that. The preliminary map that Russ is producing depicts other Waters of the US, specifically the headwaters of/and Little Robbins Slough and its interaction with various man-made drainage conveyances on the STP site. Due to redirected water flows, some of the drainage ditches on the STP site are now considered to be jurisdictional waters under the CWA. The preliminary map helps to identify the location of these drainage ditches. This preliminary map is intended to be used informational purposes only - the information intended for the docket will be contained in the Preliminary Wetland Delineation Report that is submitted to the USACE.

Item 3:

<<STPNOC will provide the NRC with a letter from the USACE regarding the Waters of the US determination for the MCR.>>

EPA, through its original NPDES permitting of the MCR, considered the MCR as part of the STP waste treatment system, and hence, not Waters of the US. The Texas Commission on Environmental Quality (TCEQ) reiterated this position when TPDES permits were issued. TCEQ has also definitively stated that the MCR is not Waters of the State. The USACE, through their delineation validation efforts will indicate which wetlands and other waters on the site are jurisdiction under section 404 of the CWA.

Item 4:

<<There is one drainage ditch that is about a mile long that the USACE is considering Waters of the US. According to Russ, this area will not be in the construction zone, but is within a lay down area. STPNOC is currently examining their options to minimize or avoid impacts to this wetland.>>

The drainage ditch in question is not a wetland. While it is considered as Waters of the U.S., it is most likely considered as "Other Waters", or "Relatively Permanent Waters". It is a drainage conveyance. The Delineation Validation from the USACE is intended to verify this assertion.

Sincerely,

Greg Gibson
Manager, Regulatory Affairs
South Texas Project, Units 3 &4
Tel: 361-972-4626
Cell: 979-665-2400
BlackBerry: 361-403-4143

-----Original Message-----

From: Paul Kallan [mailto:PBK1@nrc.gov]
Sent: Thursday, March 20, 2008 6:36 AM
To: Gibson, Gregory T
Cc: Cristina Guerrero; Hosung Ahn; James Biggins; Raj Anand; William Burton; charley.kincaid@pnl.gov ; Nona H Diediker; Rajiv Prasad
Subject: STP Dewatering and Excation

Hi Greg/Bill:

I am resending this e-mail as some of Staff's comments did not come through in the e-mail. Again, I wanted to thank you for the productive discussion we had between STP and NRC team members. I wanted to re-state what I heard in our March 19th meeting.

1. Greg Gibson mentioned that the discharge of groundwater from dewatering wells would flow into the main cooling reservoir. However, no definitive plan for discharge of stormwater/silty water from the excavation pit has been determined at this time.
2. Russ Kiesling has already contacted the USACE. STPNOC will be submitting a wetlands validation package to the USACE in the next 4 to 5 weeks. A draft map that will indicate perceived jurisdictional and non-jurisdictional wetlands is being prepared by Mr. Kiesling. This map will be provided with the validation package and STPNOC offered to provide a copy of the draft map to the NRC.
3. STPNOC will provide the NRC with a letter from the USACE regarding the Waters of the US determination for the MCR.

4. There is one drainage ditch that is about a mile long that the USACE is considering Waters of the US. According to Russ, this area will not be in the construction zone, but is within a lay down area. STPNOC is currently examining their options to minimize or avoid impacts to this wetland.

5. According to Bill Mookhoek, STPNOC's goal is to make a decision on the excavation and dewatering plan by June 2008, thus providing the NRC with the information necessary for the DEIS analysis through the RAI process.

Please call me if you any questions.

Sincerely,

Paul Kallan
Project Manager
301-415-2809

Hearing Identifier: SouthTexas34Public_EX
Email Number: 108

Mail Envelope Properties (CEEA97CC21430049B821E684512F6E5E4DA292EA37)

Subject: Fwd: RE: STP Dewatering and Excation
Sent Date: 3/25/2008 2:24:11 PM
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From: Paul Kallan

Created By: Paul.Kallan@nrc.gov

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MESSAGE	5067	3/25/2008 2:24:11 PM

Options
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