

## SusquehannaEIS Resource

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**From:** Valincia\_Darby@ios.doi.gov  
**Sent:** Monday, July 21, 2008 12:35 PM  
**To:** SusquehannaEIS Resource  
**Cc:** Dave\_Densmore@fws.gov  
**Subject:** Comments on Susquehanna Steam Electric Station DEIS ER 08/449  
**Attachments:** er08-449.pdf

Please accept the attached DOI comments on the subject DEIS. If there are questions you may contact this office at (215) 597-5378.

Thank you

Valincia Darby  
Regional Environmental Protection Assistant  
U.S. Department of the Interior, OEPC  
200 Chestnut Street, Rm. 244  
Philadelphia, PA 19106  
Phone: (215) 597-5378  
Fax: (215) 597-9845  
[Valincia\\_Darby@ios.doi.gov](mailto:Valincia_Darby@ios.doi.gov)



IN REPLY REFER TO:

# United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
Custom House, Room 244  
200 Chestnut Street  
Philadelphia, Pennsylvania 19106-2904



July 21, 2008

ER 08/0449

Chief, Rulemaking, Directives and Editing Branch  
U.S. Nuclear Regulatory Commission  
Mail Stop T6-D59  
Washington, D.C. 20555-0001

Re: Draft Generic Environmental Impact Statement (GEIS) for License Renewal of Nuclear Plants, Supplement 35, Susquehanna Steam Electric Station (SSES), Units 1 and 2, Luzerne County, Pennsylvania (NUREG-1437)

Dear Sir/Madam:

The Department of the Interior has reviewed the subject document. Please consider these comments carefully before proceeding to a final Environmental Impact Statement.

Chapter 4, *Environmental Impacts of Operation*, relies heavily on the GEIS in its analysis. For many of the issues discussed in this chapter, the following sentences constitute the only analysis: "The NRC staff has not identified any new and significant information during its independent review of the SSES ER, or the site audit, the scoping process, and evaluation of other available information, such as the EA that evaluated impacts..... Therefore, the NRC staff concludes that there would be no impacts of [plant operation on the issue] during the renewal term beyond those discussed in the GEIS." This text does not assure the reader that the preparers of the SSES ER, site audit, scoping process, EA, or other available information actually evaluated the issue and found no impacts. For example, when these sentences are inserted under the issue entitled "Premature Emergence of Aquatic Insects," the reader cannot know whether premature emergence of aquatic insects has ever been studied in the vicinity of the SSES. The document should clarify this discussion for each issue.

Thank you for the opportunity to comment. If you have any questions regarding our response, please contact the Fish and Wildlife Service's Pennsylvania Field Office at 814-234-4090.

Sincerely,

Michael Chezik  
Regional Environmental Officer

D. Densmore, FWS, State College, PA