

## PMSTPCOL PEmails

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**From:** Diediker, Nona H [nona.diediker@pnl.gov]  
**Sent:** Thursday, August 21, 2008 4:08 PM  
**To:** Paul Kallan  
**Cc:** Becker, James M; James Biggins  
**Subject:** STP Response Tracking Update  
**Attachments:** Response Tracking.xls

Attached is the revised response tracking spreadsheet based on responses provided by the applicant in four separate submittals. There are two remaining RAI responses yet to be received (2.4.2 – 1 and 2.4.2 – 3). Both of these RAIs are regarding aquatic ecology issues and the applicant has indicated they will provide a response by 09/16/08.

There were three Socioecon responses that Michael Scott regarded as non-responsive (2.5 – 4, 2.5 – 11, 2.5 – 12); however, he felt that it would be more efficient at this point to do the analysis ourselves and regard them as NFA (no further action). But, according to the feedback you received from Dan Musatti, he felt that these RAIs should remain RAIs. The attached spreadsheet reflects Dan's comments and leaves the status as "RAI", although it is with the assumption that these three will be open for discussion when we are drafting the second round of RAIs for submittal.

I provided feedback for the LWA RAI, but the NRC will need to determine if the % table the applicant provided is acceptable.

Call me if you have any questions or have problems with the document.

<<Response Tracking.xls>> **Nona H. Diediker**

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**From:** Diediker, Nona H

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South Texas Project  
RAI Response Tracking

Subject	RAI No.	Status	RAI	Comments	Response Date
Hydrology	2.2 – 1	RES	Provide a more complete description of mineral and petroleum resources in Matagorda County adjacent to the proposed facilities. The presence of petroleum wells in the vicinity of the site makes it necessary to explain why there are no mineral or petroleum “resources adjacent to or within the site boundary presently being exploited or of known commercial value.” Provide a more complete statement on the control of mineral rights, and, hence, the control of future drilling at the STP site.		7/2/2008
Hydrology	2.3 – 1	NFA	Provide USACE documentation regarding the status of the MCR as waters of the US.	The question whether the MCR is waters of the US is still open and being considered by the USACE. The staff may need to assume that the USACE determination will be affirmative (that the MCR is waters of the US) and carry out its independent impact assessment accordingly.	7/30/2008
Hydrology	2.3 – 2	RAI	Describe the existing storm water treatment and outfalls, and the water bodies into which they discharge.	The response seems adequate. The staff needs a better copy of Figure 1-1 from STPNOC 2004 Storm Water Pollution Prevention Plan included in the response.	7/2/2008
Hydrology	2.3 – 3	RAI	Provide information regarding water rights under severe droughts.	From STPNOC's response, it is not clear who STPNOC will request the emergency relief from under the stipulations of Texas Water Code Section 11.148. The staff needs to clarify the response from STPNOC, or to independently find this information.	7/2/2008
Hydrology	2.3 – 4	NFA	Provide water use requirements downstream of the STP intake.	The response seems adequate although there is some confusion caused by quoting selected sentences from the Matagorda Bay Freshwater Inflow Needs Study. The staff needs to review this study.	7/2/2008
Hydrology	2.3 – 5	NFA	Provide the location and other pertinent data for the salinity wedge in the Colorado River during various discharges.	The response seems adequate. The staff needs to check the MCR water quality modeling inputs to see if the salinity data included as part of the RAI response are appropriately used.	7/2/2008

RES = resolved; NFA = no further action; RAI = additional information needed

South Texas Project  
RAI Response Tracking

Subject	RAI No.	Status	RAI	Comments	Response Date
Hydrology	2.3 – 6	RAI	Provide details of MCR operation during existing two–unit and future four–unit operation to help staff independently estimate water–use and water–quality impacts.	The modeling effort is underway, but will not be finished before the end of 2008. There is the possibility that the modeling effort may not answer some of the questions we have regarding assessment of impacts on the MCR and on the Colorado River after they submit, and we review, the completed response to RAI 2.3-6 by end of the year (realistically January 2009). It would be helpful to get an idea how they are developing the MCR models and how they plan to use them to assess the impacts. I do not want to be telling them in January that their models need substantial tweaking.	8/14/2008
Hydrology	2.3 – 7	RAI	Provide details of the process followed in the selection of the site hydrogeologic conceptual model.	The process description is good, but could be interpreted as leading to a single alternative conceptual model. The process described does not explicitly describe the alternate conceptual models considered, and the logic that produced the plausible conservative conceptual model on which analyses are based. A contradiction exists in item (a) Drawdown at offsite wells. It states that based on the conceptual model and drawdown during construction dewatering and water production there "may" be potential impacts to offsite wells. It also states that drawdown during dewatering will "remain within the STP site boundaries." Consequently, based on these statements, it is not clear what impacts from dewatering are expected. Also, since drawdown values are presented, it will be necessary to review calculation packages.	7/2/2008
Hydrology	2.3 – 8	RAI	Provide groundwater observations for a sufficiently long period to reveal seasonal trends. If available, also provide long-term trend data on groundwater in the vicinity of the proposed facility.	The RAI response and proposed revision includes the revised table providing the groundwater observations revealing seasonal trends; however, the series of figures (Figure 2.3.1-25) showing quarterly aquifer response to stress should also be revised to show the full year seasonal response in the data set. The current figure shows February and April results only.	7/2/2008
Hydrology	2.3 – 9	RES	Provide construction details, purpose, and function of relief wells surrounding the MCR.		7/30/2008

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South Texas Project  
RAI Response Tracking

Subject	RAI No.	Status	RAI	Comments	Response Date
Hydrology	2.3 – 10	RES	Address inconsistency in ER text with respect to hydraulic conductivities presented in Figure 2.3.1–32.		7/2/2008
Hydrology	2.3 – 11	NFA	Address the inconsistency between the 1985 forecast of a decline in groundwater use in Matagorda County against currently available county data on groundwater use. Provide a projection of future groundwater use in Section 2.3.2.2, and provide a breakdown of water demand, described in Table 2.3.2-6, between that to be provided by surface water and groundwater resources.	Based on the RAI response, the NRC will state that STP plans to use its full groundwater permitted amount (3000 acre-ft/yr, 1860 gpm) with additional water requirements for specific purposes being provided from the MCR. Also, based on information from the CPGCD, the NRC will note that the permitted groundwater use level is shown as an annual average, but is actually a 5-yr commitment. Accordingly, higher than average annual usage in one year can be balanced against lower usage years within the 5-yr permit period. The NRC will check further to learn of the groundwater usage estimated for the STP in the North Gulf Coast Aquifer GAM. Reliance on the GAM results will, in part, rely on the use of the full groundwater allotment of 3000 acre-ft/yr in the model.	7/15/2008
Hydrology	2.3 – 12	NFA	Provide an analysis of the sustainable groundwater resource.	The NRC will contact the CPGCD and reflect in the EIS their view of the potential to satisfy peak demand for outages through an increased permitted groundwater allotment for short-term uses.	7/15/2008
Hydrology	2.3 – 13	RES	Provide a clarification on the role of production wells related to groundwater pathway and impact on the deep aquifer.		7/2/2008
Hydrology	2.3 – 14	RES	Provide a description of the STP groundwater monitoring program.		7/2/2008
Hydrology	2.3 – 15	RES	Provide definitive information regarding known or assumed tritium sources.		7/15/2008
Hydrology	2.6 – 1	RAI	Provide a summary of past and expected surface settlements and how future settlements may impact surface water drainages, a description of various dewatering options, and relative settlements expected for each dewatering option.	The response draws heavily on the assumed similarity of construction dewatering for existing STP Units 1&2 and proposed STP Units 3&4. A summary comparison of the two events is needed to support this assumption. Information to be included would be the area dewatered, depth of dewatering, duration of dewatering, and measured and expected dewatering production rate.	7/2/2008
Hydrology	4.2 – 1	RES	Describe water resources that may be impacted along the transmission line.		7/15/2008

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South Texas Project  
RAI Response Tracking

Subject	RAI No.	Status	RAI	Comments	Response Date
Hydrology	4.2 – 2	RES	Describe construction–related water quality impacts to hydrologic features.		7/15/2008
Hydrology	4.2 – 3	RES	Provide information regarding the Erosion and Sediment Control Plan and Storm Water Management Plan.		7/15/2008
Hydrology	4.2 – 4	RES	Describe the impacts of new pump installation activities.		7/15/2008
Hydrology	4.2 – 5	RAI	Provide information regarding the locations of drainage ditches and retention ponds.	The RAI response states that the final location of the main drainage ditch, which is to be relocated north of the STP Units 3 and 4, is still undetermined. The staff were provided a map by Russ Kiesling of STPNOC where the location of the MDC was sketched. The staff needs to clarify if the RAI response is consistent with that map.	7/15/2008
Hydrology	4.2 – 6	RAI	Describe the analytical process used to determine impacts to surface water hydrology would be SMALL.	The RAI response details what would be done during construction of STP Units 3 and 4. There is still no description of the process or the bases used to determine that the impacts on surface water from these activities are SMALL. The argument presented still is that the impacts will be SMALL since the activities are allowed under a state or a federal permit. The staff does not have enough information to carry out its own independent assessment of the level of the impact from construction as required by 10 CFR 51.71(d).	7/2/2008
Hydrology	4.2 – 7	RAI	Provide a list and description of pre–construction activities mentioned in ER Section 1.1.2.7.	Power Block Earthwork is mentioned as a pre-construction activity. Structural fill will be placed in some of the excavations. Also, it seems that the fabrication of the reactor building base mat reinforcing module would occur prior to the COL being granted. The staff needs clarification if these activities could be called “pre-construction” under the new LWA rule.	7/15/2008

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South Texas Project  
RAI Response Tracking

Subject	RAI No.	Status	RAI	Comments	Response Date
Hydrology	4.2 – 8	RAI	Provide a map or drawing showing the extent of the excavations, and how close they will come to STP 1 & 2, the MCR, and wetlands. Describe the dewatering and excavation process.	The ER describes two excavations 900'x950' for the units, and one 650'x550' for the ultimate heat sink. The RAI response states that dewatering has been analyzed assuming a 1200'x650' excavation. The RAI response also states that the requested map of excavations can not be provided. The information in the ER and RAI response appears to be contradictory. It is not possible to fit two 900'x950' excavations into a 1200'x650' hypothetical excavation. The staff need a basis for performing a bounding calculation of dewatering impact, and this RAI response does not provide it. Without a site map showing the relative position of excavations it is not possible to put forward a single excavation that would bound all excavations.	7/15/2008
Hydrology	4.2 – 9	NFA	Why is the lower value of subsidence estimates used?	Staff will mention the commitment of STP to monitor groundwater levels, and dewatering pumping rates, and to react appropriately with modifications to the dewatering plan (e.g., including the construction of cutoff walls) to limit potential impacts to nearby surface drainage and facilities.	7/15/2008
Hydrology	4.2 – 10	RAI	Demonstrate the lack of connectivity between dewatering wells and the wetlands and shallow surface water features.	Staff will mention the willingness of STP to monitor groundwater and surface features in the vicinity of the dewatering activity, and, if significant impacts are observed, STP's willingness to implement remedies including supplementing flow to the wetlands and installing cutoff walls. However, STP's statement that "... dewatering activities could be monitored during dewatering activities to determine if dewatering activities are impacting surface water features ..." needs to be clarified. Staff need to be able to refer to monitoring and possible remedies as a commitment by STP. Thus, an RAI is needed.	7/15/2008
Hydrology	4.2 – 11	RAI	Provide a full description of the potential impacts to nearby groundwater users.	While the response is adequate, it would appear that review of a calculation package will be necessary to check the potential drawdown values included in the RAI response.	7/15/2008
Hydrology	4.2 – 12	NFA	Present an evaluation or validation of the model shown at the beginning of Section 4.2.2.1.	While the response is adequate, it would appear that review of a calculation package will be necessary to check the potential drawdown values included in the RAI response. Access to the calculation package will be requested under the follow-on to RAI 4.2-11.	7/15/2008

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South Texas Project  
RAI Response Tracking

Subject	RAI No.	Status	RAI	Comments	Response Date
Hydrology	4.2 – 13	RES	Provide information regarding dewatering discharge locations, any required ditches and retention ponds and associated permits, storm water outfalls, storm water treatment, and water bodies into which storm water will be discharged.		8/14/2008
Hydrology	5.2 – 1	NFA	Discuss the incremental change in the availability of the water resource, and the incremental change in groundwater drawdown as an impact of station operation on potential water users.	With regard to surface water resources, the response seems adequate. The staff will need to review the MCR water budget model to ensure that this response is consistent with the MCR operation policy implemented in the model. The model results would provide the incremental year-to-year impact to water resources due to operation of STP Units 3 and 4 that may be more severe than the ~7.5% of the 2060 available water in the Colorado Basin stated in this RAI response. With regard to the groundwater resource, the response in RAI 2.3-12 is adequate and requires No Further Action by the applicant.	7/15/2008
Hydrology	5.2 – 2	RES	Address inconsistencies in the ER regarding groundwater impact levels.		7/15/2008
Hydrology	5.2 – 3	RES	Describe quantitatively the known impacts and qualitatively the potential future impacts on the groundwater system.		7/15/2008
Hydrology	6.3 – 1	NFA	Describe waste effluent and storm water outfalls that will be added to existing outfalls and the water bodies into which they will discharge.	The response states that the storm water outfalls and the receiving water bodies will be same as those for Units 1 and 2. This is adequate but the response to 4.2-13 needs to be consistent with this response.	7/15/2008
Hydrology	6.3 – 2	RES	Provide information regarding the anticipated operational monitoring deriving from the NRC 10 CFR 20.1406 initiative and the Nuclear Energy Institute program.		7/15/2008

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South Texas Project  
RAI Response Tracking

Subject	RAI No.	Status	RAI	Comments	Response Date
Hydrology	9.4 – 1	RAI	If the MCR is part of the closed-loop cooling system, then describe alternatives considered for the proposed circulating water system including a description of all elements required by ESRP 9.4.2. Describe the process followed to determine that no obviously superior alternatives for the proposed circulating water system, water supply, and water treatment exist.	The response did not identify and discuss alternative water supplies to the proposed cooling system for STP Units 3 and 4 as recommended by ESRP 9.4.2.	7/15/2008
Hydrology	10.5S – 1	RES	Describe groundwater conservation and other mitigative measures as noted in Section 10.5S.1.2.		8/14/2008
Hydrology	10.5S – 2	RAI	Describe the analytical process used to determine cumulative impacts to downstream surface water users.	The response is not quite what we were looking for. They still are arguing about the fact that they will operate the new units under existing permits and therefore the cumulative impact will be SMALL. We can push them on this a bit, or, wait for the MCR water budget and water quality models to become available and use the results for 2-units and 4-units operations to assess the cumulative impact ourselves.	8/14/2008
Met/AQ Accidents	2.7 – 1	NFA	Provide a climatological summary of the STP meteorological data.	Further pursuit of this is not going to be worth the effort.	7/15/2008
Met/AQ Accidents	2.7 – 2	RAI	Discuss the likelihood that the combination of the MCR and the STP Unit 3 & 4 cooling towers will have a synergistic effect that increases the frequency or intensity of fog.	Response does not address changes in location of cooling towers. Will have to be revisited to include consideration of the revised cooling tower location.	7/15/2008
Met/AQ Accidents	2.7 – 3	RAI	Describe which PAVAN files were used and how the 50% $\chi/Q$ values were derived.	Response needs further amplification. Not clear that the approach can be used to give the 50% X/Q values.	7/15/2008
Met/AQ Accidents	2.7 – 4	RES	Explain why the XOQDOQ results presented in the FSAR differ from the results presented in the ER.		7/15/2008
Met/AQ Accidents	2.7 – 5	RAI	Interpret the word "may" as it relates to actions to mitigate potential impacts of construction on air quality.	In general, initial RAI response ok. However, the response raises the issue of a "Construction Environmental Control Plan." Need more information about that plan. When? Who? External review and approval?	7/2/2008

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South Texas Project  
RAI Response Tracking

Subject	RAI No.	Status	RAI	Comments	Response Date
Met/AQ Accidents	3.4.1 – 1	NFA	Provide a citation for the estimated cooling tower noise level of about 57 dBA.	The RAI response is an attempt to side step the issue. Continued pursuit of information not likely to be of much value.	7/2/2008
Met/AQ Accidents	5.3.3.1 – 1	RAI	Justify the assumption in the 2nd paragraph of ER Section 5.3.3.1.2 that there will not be increased fogging.	Response relies on monthly average values of temperature increase in pond to support assumption. The monthly average values indicate a 37% increase in saturation vapor pressure of the MCR during the winter and a bout a 7% increase in radiative heat loss. The justification for there assumption that there will be no impact on fogging is not convincing.	7/30/2008
Met/AQ Accidents	5.3.3.1 – 2	RES	Provide consistent values for cooling tower drift deposition at the Unit 3&4 switchyard.		7/2/2008
Met/AQ Accidents	7.1 – 1	RAI	Provide the source of the dose factors used in evaluation of each design basis accident.	Initial response references whole body dose factors from a GE report. Request a listing of those dose factors. Need to check on the duration of the instrument line break accident dose calculation for the EAB.	7/15/2008
Met/AQ Accidents	7.1 – 2	RES	Provide correct EAB and LPZ dose estimates for the Clean Up Water Line Break Outside Containment DBA in Table 7.1–12.		7/15/2008
Met/AQ Accidents	7.2 – 1	RES	Provide MACCS2 input and output files for MACCS2 calculations that include calculations of early fatalities for an average individual within 1 mile of Units 3&4.		7/2/2008
Met/AQ Accidents	7.2 – 2	RES	Provide a description of each severe accident scenario and release category.		7/2/2008
Met/AQ Accidents	7.2 – 3	RES	Provide source terms, core damage frequencies and severe accident consequences by release category. Separate the consequences for the air and water pathways.		7/2/2008
Met/AQ Accidents	7.2 – 4	NFA	Provide a discussion of the risks associated with external initiating events.	Further pursuit of this is not going to be worth the effort. Can get information from DCD/FSAR.	7/2/2008
Met/AQ Accidents	7.2 – 5	RES	Describe how evacuation was modeled in MACCS2.		7/2/2008

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South Texas Project  
RAI Response Tracking

Subject	RAI No.	Status	RAI	Comments	Response Date
Met/AQ Accidents	7.2 – 6	RAI	Provide a list of major surface water users within 50 mi of STP Units 3 & 4, especially public water supplies.	Initial RAI response unresponsive. Need information on surface water users to interpret/evaluate MACCS2 results.	7/2/2008
Met/AQ Accidents	7.2 – 7	RAI	Revise the discussion of the groundwater pathway risks for STP Units 3 & 4 to support the conclusion in the last sentence of ER Section 7.2.2.3.	Initial RAI response still lacks complete logic chain. Need a statement on the magnitude of releases to groundwater from ABWR compared to existing units.	7/2/2008
Met/AQ Accidents	7.2 – 8	NFA	Describe how the average individual risk listed in ER Section 7.2.3 was determined.	Initial RAI response indicates deviation from accepted methodology. However, MACCS2 output file includes the needed information.	7/2/2008
Met/AQ Accidents	7.2 – 9	RAI	Discuss ABWR DCD COL action items and open items related to severe accidents and how the action and open items will be addressed.	STP FSAR, which addresses the COL action items listed in DCD Chapter 19.9, references an Appendix 19R to an unspecified document. There does not appear to be an Appendix 19R supplied with the application.	7/2/2008
Met/AQ Accidents	7.3 – 1	NFA	Discuss the process for ensuring that SAMAs related to operating procedure and administrative controls will be evaluated prior to plant startup.	Initial RAI response is ambiguous, "... could be by such means as..." Would like a more specific statement about procedures, but probably not worth pursuing.	7/2/2008
Land Use Alt Sites	2.2.1 – 1	RES	Revise Tables 2.2–1 and 2.2–2 in the ER to reflect land occupied by STP units 1 and 2 and auxiliary facilities.		7/2/2008

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South Texas Project  
RAI Response Tracking

Subject	RAI No.	Status	RAI	Comments	Response Date
Land Use Alt Sites	9.3 – 1	RAI	Explain how the Limestone alternative site satisfies NRC's siting criteria for candidate sites.	<p>The staff requests further information regarding how the Limestone site is among the best candidate sites that can reasonably be found for the siting of a nuclear power plant (ESRP 9.3) given the water scarcity and mineral rights issues at the site. NRG is one of the planned co-owners of STP Units 3 and 4. In NRG's Limestone 3 Expansion Project fact sheet (<a href="http://www.nrgenergy.com/pdf/factsheet_limestone.pdf">http://www.nrgenergy.com/pdf/factsheet_limestone.pdf</a>), NRG states that "to conserve scarce water resources in the area, Limestone 3 will use dry cooling to condense the steam back into water." STPNOC's response states that "it assumed that sufficient water could be purchased and developed for cooling at the site." STPNOC's response also notes that "dry cooling is not necessarily an appropriate alternative cooling technology for ABWR units." The staff is having difficulty reconciling STPNOC's responses with the NRG statements in the Limestone 3 fact sheet. Specifically, if sufficient water could be purchased for the Limestone site (as stated in the response), the staff does not understand why NRG would propose dry cooling for Limestone 3 given the economic penalty of dry cooling in comparison to wet cooling. In addition, since dry cooling is proposed by NRG for Limestone 3, the staff does not understand how Limestone could be a candidate site for ABWR units for which dry cooling is an inappropriate cooling technology. In its response, STPNOC also states that it assumed that it could acquire the mineral and natural gas rights to the Limestone site. During the staff visit to the Limestone site in March 2008, staff was told by NRG personnel that the mineral rights issue was a serious concern at the site and that NRG had to initiate legal action to prevent drilling for natural gas under the ash pile at the site. The staff does not understand why, if the mineral rights at the Limestone site could be acquired as the response states, NRG has not already</p>	7/15/2008

South Texas Project  
RAI Response Tracking

Subject	RAI No.	Status	RAI	Comments	Response Date
Land Use Alt Sites	9.3 – 2	RAI	How would inclusion of information regarding the proposed coal-fired unit 3 at the Limestone site affect the discussion of the site in section 9.3.3.1 of the ER?	Attachment 61 of STPNOC's 7/15/08 RAI response states that the siting of Limestone 3 would not change the analysis in section 9.3.3.1 of the ER which currently does not address any impacts from Limestone 3. The response further states that Limestone 3 would take advantage of existing infrastructure and that new ABWR units at the Limestone site would not significantly affect the construction and operation at the site. The staff does not understand how siting of both new ABWR units and Limestone 3 at the Limestone site would not change the analysis in section 9.3.3.1 of the ER. If work on the ABWR units and Limestone 3 were being conducted concurrently it seems that at a minimum there would be enhanced socioeconomic impacts from the two construction projects that would be pertinent to the discussion in section 9.3.3.1 of the ER. In addition, STPNOC's statement at p. 1 of Attachment 60 to the 7/15/08 RAI response (In assessing the environmental impacts of ABWR units at the Limestone site, STPNOC assumed that the ABWR would be sited there instead of a third coal-fired plant) does not seem consistent with the STPNOC statements in Attachment 61 of the 7/15/08 RAI response (STPNOC anticipated that the ABWR units would be built in the Freestone County portion of the site. STPNOC assumes that the Limestone 3 plant would take advantage of the infrastructure within the coal-fired plant area in Limestone County). The staff requests clarification of the preceding statements. The staff also requests information on who owns the mineral rights at the Freestone County portion of the Limestone site.	7/15/2008
Land Use Alt Sites	9.3 – 3	RES	What are the dimensions of the existing transmission line ROWs serving the Limestone site?		7/15/2008

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South Texas Project  
RAI Response Tracking

Subject	RAI No.	Status	RAI	Comments	Response Date
Land Use Alt Sites	9.3 – 4	RAI	Explain how the Malakoff alternative site satisfies NRC's siting criteria for candidate sites.	The staff requests additional information on practical, specific water sources that could support wet cooling for new ABWR units located at the Malakoff site. The staff was not able to identify any such water sources during their visit to the Malakoff site in March 2008. The staff also requests specific references to where the Texas Water Development Board has stated that surface water is "plentiful" (see p. 1 of Attachment 63 of STPNOC's 7/15/08 RAI response) in the vicinity of the Malakoff site.	7/15/2008
Land Use Alt Sites	9.3 – 5	RES	Who are the current owners of the Allen's Creek and Malakoff alternative sites?		7/2/2008
Rad. Health	3.5 – 1	RES	Provide explanations and calculations, as appropriate, of the inputs to the LADTAP, GASPARG, and construction worker dose calculation. One acceptable way to respond to this RAI would be to provide the calculation packages.		7/2/2008
Rad. Health	4.5 – 1	RES	Discuss rationale for comparing construction worker doses to 40 CFR 190 criteria.		7/2/2008
Rad. Health	4.5 – 2	RES	Discuss rationale for comparing construction worker doses to 10 CFR 50 Appendix I criteria.		7/2/2008
Rad. Health	4.5 – 3	RES	What was the thought process for using Units 1 & 2 Annual Effluent Report data for 2005 to calculate air pathway doses to construction workers?		7/2/2008
Rad. Health	5.4.1 – 1	RES	What source term was used for the LADTAP input file "LADTROP2.DAT"?	STP states, "The header line preceding the source terms ... was not revised from initial analyses and incorrectly notes that the source terms are based on DCD Table 12.2-22." They will also update ER section 5.4.1 with correct reference and the FSAR will be updated to include the additional radionuclides (Ag-110-m and Sb-124).	7/2/2008
Rad. Health	5.4.1 – 2	NFA	Why does the ABWR DCD table 12.2-22 not match the FSAR table 12.2-22	STP will include Ag-110-m and Sb-124 in the FSAR, but did not mention updating the Nd-147 in the ABWR DCD.	7/2/2008

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South Texas Project  
RAI Response Tracking

Subject	RAI No.	Status	RAI	Comments	Response Date
Rad. Health	5.4.1 – 3	NFA	What is the basis and where did the source term for LADTROB2.DAT come from?	STP said they started with 55 nuclides from DCD table 12.2-22 but removed 9 radionuclides that had ZERO release to MCR and another 9 that had ZERO fractions reaching Little Robins Slough. And supplemental LADTAP runs which included Np-239 showed the dose contribution as negligible. However, it would be nice to see the corrected results in the COLA revision.	7/2/2008
Rad. Health	5.4.1 – 4	NFA	Where did the source term for LADTROB2.DAT come from?	STP said they started with 55 nuclides from DCD table 12.2-22 but removed 9 radionuclides that had ZERO release to MCR and another 9 that had ZERO fractions reaching Little Robins Slough. And supplemental LADTAP runs which included Np-239 showed the dose contribution as negligible. HOWEVER, it would be nice to see the corrected results in the COLA revision.	7/2/2008
Rad. Health	5.4.4 – 1	NFA	What effect will raising the MCR level by 2 feet, have on the migration of radionuclides from MCR to Little Robbins Slough?	STP's response was that the ODCM calculation of radionuclide migration to Little Robbins Slough is conservative because MCR operates at 150,000 Ac-ft of water for 2 unit operation and will increase to about 202,700 Ac-ft when the level is raised 2 ft - this will effectively dilute the radionuclide concentrations in MCR. The dilution of radionuclides in MCR has greater effect than the 6% increase in pressure head will have on migration out of MCR. "In any case, the reservoir was designed for 4-unit operation and since the ODCM seepage analysis assumes design stage estimates, the liquid discharge flow to Little Robbins Slough used in the ER is valid."	7/2/2008
Cult Res	4.1.3 – 1	RES	Provide the plant procedure for inadvertent discovery of archaeological remains.		6/4/2008
Trans Lines	3.7 – 1	RES	Explain whether the replacement of transmission line towers would result in impacts outside existing transmission line corridors.		7/30/2008
Terres Ecology	2.4.1 – 1	RES	Provide information regarding terrestrial species composition and abundance by habitat type on the STP site.		8/14/2008

RES = resolved; NFA = no further action; RAI = additional information needed

South Texas Project  
RAI Response Tracking

Subject	RAI No.	Status	RAI	Comments	Response Date
Terres Ecology	2.4.1 – 2	RES	Provide current information on the type and relative abundance of migratory bird species and waterfowl using the habitats on the STP site, potential impacts to these populations, and proposed mitigation measures to limit impacts during construction and operation.		8/14/2008
Terres Ecology	2.4.1 – 3	RAI	Provide information and maps depicting all wetlands identified on the STP site during field surveys in 2006, 2007 and 2008.	Response did not provide any new data or information. see below "The results of these surveys were submitted in a preliminary report to USACE on April 9, 2008. The classifications of these wetlands and water bodies (primarily ditches) are pending confirmation of the STPNOC determination by USACE. Requested data from these sites will be submitted after receipt of the USACE response."	8/14/2008
Terres Ecology	2.4.1 – 4	RAI	Provide updated information describing and mapping water features and related wetland features on the STP site.	Response did not provide any new data or information. see below "The results of these surveys were submitted in a preliminary report to USACE on April 9, 2008. The classifications of these wetlands and water bodies (primarily ditches) are pending confirmation of the STPNOC determination by USACE. Requested data from these sites will be submitted after receipt of the USACE response."	8/14/2008
Terres Ecology	2.4.1 – 5	RAI	Provide graphics that illustrate the salt deposition isopleths overlaid on existing habitat maps and wetland maps.	They did respond to the question, but it appears that the question is moot given potential design changes. A new figure will be developed once site layout/design changes are complete. Also, the figure only identifies wetlands, does not show the existing terrestrial habitats that would be impacted by a the salt plume deposition--so is deficient.	7/30/2008
Terres Ecology	4.3.1 – 1	RES	Identify and discuss habitats and important species associated with the 20-mile upgrade section of the Hillje transmission corridor.		7/15/2008

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South Texas Project  
RAI Response Tracking

Subject	RAI No.	Status	RAI	Comments	Response Date
Terres Ecology	4.3.1 – 2	RAI	Provide information and figures describing the proposed locations of various construction project areas and activities and describe associated impacts to terrestrial resources.	The RAI was answered; however, the RAI refers to a figure that was not supplied in the response. Figure 3.9S-1, which applicant states "will be changed accordingly" due to changes in the locations of various construction activities that have occurred since ER Rev. 1, needs to be provided.	8/14/2008
Terres Ecology	9.3.2 – 1	RES	Provide the documentation that supports the statements and conclusions used in Section 9.3 on terrestrial resources at the Limestone site.		7/2/2008
Terres Ecology	9.3.2 – 2	RES	Provide the documentation that supports the statements and conclusions used in Section 9.3 on terrestrial resources at the Allens Creek site.		7/15/2008
Terres Ecology	9.3.2 – 3	RES	Provide the documentation that supports the statements and conclusions used in Section 9.3 on terrestrial resources at the Malakoff site.		7/15/2008
Aquatic Ecology	2.4.2 – 1		Provide the results of the 12 months of aquatic resource sampling in the Colorado River.		9/16/2008
Aquatic Ecology	2.4.2 – 2	RAI	Describe the aquatic habitat features at the RMPF.	Most of the questions in the supporting information are adequate. However, at the STP site audit, ENSR described why some gear types for sampling could not be used at the RMPF. The RAI does not reflect the information described at the site audit and the ENSR 2008 report does not address this question either. Request further information on sampling activities specifically applied at the RMPF.	7/15/2008
Aquatic Ecology	2.4.2 – 3		Characterize the aquatic resources in the MCR.		9/16/2008
Aquatic Ecology	2.4.2 – 4	NFA	Describe the saltwater wedge at the RMPF (~NMM 8 on the Colorado River).	The response seems adequate. The staff needs to check the MCR water quality modeling inputs to see if the salinity data included as part of the RAI response are appropriately used.	7/2/2008
Aquatic Ecology	2.4.2 – 5	RAI	Discuss the uncertainties in evaluating the aquatic resources from past to current studies.	The response seems adequate. The staff needs to check the calculations based on Jaccard coefficients to support conclusions. Request raw data on monthly sampling to verify calculations.	7/2/2008

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South Texas Project  
RAI Response Tracking

Subject	RAI No.	Status	RAI	Comments	Response Date
Aquatic Ecology	2.4.2 – 6	RES	In Table 2.4–2, what land area does the column, “STP Site”, include?		7/2/2008
Aquatic Ecology	2.4.2 – 7	RES	Provide correspondence with U.S. Fish and Wildlife Service, National Oceanic and Atmospheric Administration, and U.S. Army Corps of Engineers that has occurred since September 20, 2007.		7/2/2008
Aquatic Ecology	2.4.2 – 8	NFA	Discuss the different classifications of wetlands on the STP site and the acreages associated with each.	The response addresses and clarifies the ER sections. However, further information on wetlands needs to be provided through consultation with ACE.	7/2/2008
Aquatic Ecology	2.4.2 – 9	RES	What requirements are there for Segment 1401 of the Colorado River associated with listing of the region as “impaired waters due to the presence of bacteria”?		7/2/2008
Aquatic Ecology	2.4.2 – 10	RES	Provide information on the application for the Coastal Consistency Determination for Units 3 & 4.		7/2/2008
Aquatic Ecology	4.3.2 – 1	NFA	What are the requirements for dredging in the Colorado River under the existing permits with the U.S. Corps of Engineers?	Requested the correspondence, but was provided instead with summary of information presumably from the correspondence.	7/15/2008
Aquatic Ecology	4.3.2 – 2	RES	Provide specific examples of activities that will reduce impacts to aquatic resources associated with the Erosion and Sediment Control Plan and Storm Water Management Plan.		7/2/2008
Aquatic Ecology	4.3.2 – 3	NFA	What are the impacts from construction activities on aquatic resources associated with surface water and drainage ditches?	The response is adequate. Need to re-evaluate when further information from ACE on the slough and ditches are available.	7/2/2008
Aquatic Ecology	4.3.2 – 4	RAI	Provide information and figures describing the proposed locations of various construction project areas and activities and describe associated impacts to aquatic resources.	The RAI was answered. However, the RAI refers to a figure that was not supplied in the response. Figure 3.9S-1, which applicant states "will be changed accordingly" due to changes in the locations of various construction activities that have occurred since ER Rev. 1, needs to be provided.	7/2/2008
Aquatic Ecology	4.6 – 1	RAI	Describe the planned control program to mitigate construction-related impacts to aquatic ecosystems from suspended sediments.	The response does not address the question. Section 4.6-1 is a table of "planned control programs". Response does not address question. When response to RAI 4.2-13 is received, the staff will re-evaluate the need for further RAIs.	7/2/2008

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South Texas Project  
RAI Response Tracking

Subject	RAI No.	Status	RAI	Comments	Response Date
Aquatic Ecology	5.3.1.2 – 1	RAI	Describe the design feature of the RMPF that allows an “escape route” for fish to swim back to the river and precluding entrapment.	While response is complete, more questions arise from the response. Response states that fish return system is blocked at high river flows to prevent plugging from debris. ER states that pumping at RMPF occurs only at high flows. Thus, the fish return system must not be operational when pumping at RMPF, and impact to aquatic organisms must be greater than stated in ER. Follow on RAI needed to confirm new information and impact assessment assumptions.	7/15/2008
Aquatic Ecology	5.3.1.2 – 2	RAI	Describe the process for calculating the maximum design approach velocity at the traveling screens on the RMPF for four units and provide the results of the calculations.	Response did not provide data requested to validate important design parameters. Follow on RAIs will ask more specifically for information used in ER and other references.	7/15/2008
Aquatic Ecology	5.3.1.2 – 3	RAI	What is the magnitude of impingement and entrainment of aquatic species at the RMPF for the species of fish currently found in the Colorado River compared to species present prior to 1993 when the diversion channel directed the river into East Matagorda Bay?	The response does not address the question. ENSR 2008 study was not designed to estimate impingement and entrainment. The response does not try to make a case based on EPA Clean Water Act 316(b) analyses. The response is also confusing because the 9th paragraph (on page 3 of 4, Attachment 14) implies that the information is on the Main Cooling Pond, but the reference (ENSR 2008) is the Colorado River report.	8/14/2008
Aquatic Ecology	5.3.1.2 – 4	NFA	What is the impact of operation of the RMPF on managed species included in the Fisheries Management Plans for the Gulf of Mexico?	While the response is difficult to understand, there is enough information at this time to proceed with EFH consultation with NMFS.	8/14/2008
Aquatic Ecology	5.3.1.2 – 5	RES	Please describe the proposed bank stabilization project and its impact on terrestrial and aquatic resources.		8/14/2008
Aquatic Ecology	5.3.2 – 1	RES	Provide information on how aquatic resources may be impacted by discharges at outfall 001.		8/14/2008
Aquatic Ecology	5.3.2 – 2	NFA	How will water discharged at outfall 001 be evaluated and compliance with TCEQ permit # WQ0001908000 be determined?	Response is not consistent with information provided at site audit. Will address further when information from RAI 2.3-6 (the MCR water quality model results) is received.	7/15/2008

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South Texas Project  
RAI Response Tracking

Subject	RAI No.	Status	RAI	Comments	Response Date
Aquatic Ecology	5.3.2 – 3	RAI	What is the impact of outfall 001 and discharge from the MCR on managed species included in the Fisheries Management Plans for the Gulf of Mexico?	Response did not consider fish passage during discharge. Information on the configuration of the river bottom was not considered.	7/2/2008
Aquatic Ecology	5.3.4 – 1	RES	What are the annual maximum and minimum flow rates and temperatures for the Colorado River in the vicinity of the blowdown structure on the Colorado River? What is the frequency planned for discharging at outfall 001?		8/14/2008
Aquatic Ecology	5.3.4 – 2	RES	Identify the recreational uses within Segment 1401 of the Colorado River and discuss the potential for exposure to thermophilic microorganisms via the thermal plume associated with outfall 001.		7/15/2008
Aquatic Ecology	5.3.4 – 3	RES	Provide documentation of any correspondence with the Texas Department of State Health Services in support of the evaluation of thermophilic microorganisms in the vicinity of the discharge from the MCR into the Colorado River.		7/2/2008
Aquatic Ecology	5.3.4 – 4	NFA	How does the state's designation of Segment 1401 of the Colorado River as "impaired" relate to the impact evaluation?	Links with 2.4.2 - 10. Not all accurate, but usable.	7/2/2008
Aquatic Ecology	5.10 – 2	RES	Explain the difference regarding the potential impact significance for water quality impacts found in Table 5.10-1 and the determination stated in the text of Section 5.2.3.		7/2/2008
Aquatic Ecology	5.10 – 3	RES	Explain the difference in the planned control program information for the discharge system and the description of temperature limits for TPDES Permit No. WQ0001908000.		7/2/2008

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South Texas Project  
RAI Response Tracking

Subject	RAI No.	Status	RAI	Comments	Response Date
Aquatic Ecology	9.3.2 – 4	NFA	Please describe potential impacts to threatened or endangered species and their habitats as a result of construction and operation at each of the three alternative sites.	We will use other references to specifically address impacts based on the list of species provided. Assumptions for impact evaluation is still not clear. See RAIs 9.3.3-1, 9.3.3-2, and 9.3.3-3.	7/2/2008
Aquatic Ecology	9.3.3 – 1	RAI	Describe the process used to quantify the impact statement for aquatic resources at the Limestone site and provide the documentation that supports the statements and conclusions used in Section 9.3.	Response does not address question and raises more questions.	7/2/2008
Aquatic Ecology	9.3.3 – 2	RAI	Describe the process used to quantify the impact statement for aquatic resources at the Allens Creek site and provide the documentation that supports the statements and conclusions used in Section 9.3.	Response does not address question and raises more questions.	7/2/2008
Aquatic Ecology	9.3.3 – 3	RAI	Describe the process used to quantify the impact statement for aquatic resources at the Malakoff site and provide the documentation that supports the statements and conclusions used in Section 9.3.	Response does not address question and raises more questions.	7/2/2008
Socio/EJ Need for Power	2.5 – 1	NFA	Provide an electronic copy of the Socioeconomics “Validation Package”.	Validation package doesn't do us a whole lot of good in Texas. Unable to review.	7/2/2008
Socio/EJ Need for Power	2.5 – 2	NFA	Update population and growth rates based on post-2000 Census data.	We were hoping that they would at least test the forecasts against post-2000 estimates. Clearly they are not going to do that, so we will.	7/15/2008
Socio/EJ Need for Power	2.5 – 3	RES	Provide an estimate of transient population employment in the fishing industry.		7/2/2008

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South Texas Project  
RAI Response Tracking

Subject	RAI No.	Status	RAI	Comments	Response Date
Socio/EJ Need for Power	2.5 – 4	RAI	Provide a discussion of important community social structures and organizations.	The applicant has taken the position that NUREG 1555 does not require any analysis of faith based or NGO social service providers. Their response was instead a short primer on the different ways governments are organized and then an interpretation of the NUREG's call for a discussion of social services (it was a mistake, apparently). However, the discussion does not absolve the applicant from its responsibility to provide sufficient information on the social structure of the affected area, the expected changes that might occur during construction and operations, to ensure that they have gotten it right in their ER.	8/14/2008
Socio/EJ Need for Power	2.5 – 5	RES	Identify public and private recreational facilities and opportunities, including present and projected capacity and percentage of use.		7/30/2008
Socio/EJ Need for Power	2.5 – 6	RAI	Provide a discussion of non-zoning controls on land development	The response seems to be sufficient, except that there are no citations to support the discussion. The applicant needs to provide such documentation as to how they reached their conclusions.	8/14/2008
Socio/EJ Need for Power	2.5 – 7	RES	Provide a discussion of changes to anticipated levels of traffic identified by state transportation planners for Matagorda and surrounding counties.		7/15/2008
Socio/EJ Need for Power	2.5 – 8	RES	Provide a discussion of distinctive (e.g., minority, ethnic, religious) communities that exist in the area of the STP plant.		7/2/2008
Socio/EJ Need for Power	2.5 – 9	RES	Discuss contacts made with minority and low-income populations and state whether they identified any environmental concerns about STP Units 3 & 4.		7/2/2008
Socio/EJ Need for Power	2.5 – 10	RES	What is the projected use of outdoor recreational facilities near STP?		7/2/2008

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South Texas Project  
RAI Response Tracking

Subject	RAI No.	Status	RAI	Comments	Response Date
Socio/EJ Need for Power	2.5 – 11	RAI	Confirm whether the 2000 Census is the most recent data available for housing availability in the counties near STP.	If the applicant is going to assert there are no differences except scale between the 2000 Census and more recent data, they will have to support that assertion by doing an analysis of the differences. In other words, they will have to prove their hypothesis by comparing 2000 Census data and more recent information (2005 Census updates, Texas statistics, etc., along with recent housing information available from sources other than Census). If this analysis does not support their hypothesis, then the applicant will have to revise their analysis based upon more recent data.	8/14/2008
Socio/EJ Need for Power	2.5 – 12	RAI	Discuss non-governmental service organizations located in Matagorda County and adjacent counties.	The applicant's response is another assertion that NGOs are not appropriate. Staff disagrees and requests the applicant provide the data requested. Their assertion that NGOs "are not directly impacted by project-induced changes to employment and, hence, changes in population" is incorrect and does not absolve the applicant from their responsibility to provide sufficient information to accept their analysis.	8/14/2008
Socio/EJ Need for Power	2.5 – 13	RES	Discuss the participation in federal school free and low-cost lunch programs.		7/30/2008
Socio/EJ Need for Power	2.5 – 14	RES	Discuss the importance of local "roll-back" elections for ISD finances operating revenue.		7/30/2008
Socio/EJ Need for Power	2.5 – 15	RES	Discuss the outcome of the Moak, Casey, and Associates study and provide a copy.		7/15/2008
Socio/EJ Need for Power	2.5 – 16	RES	Describe the tax impact of the expanding San Antonio share of the STP 1 & 2, and impact of STP 3 & 4.		7/30/2008
Socio/EJ Need for Power	2.5 – 17	NFA	Describe the future impact of the growth in electricity production on water demand in the Colorado River.	We may have to seek the information on projects from the State Water Board	7/30/2008
Socio/EJ Need for Power	2.5 – 18	NFA	Clarify contents and provide copies of references 2.5-14, 2.5-15, and 2.5-17.	Did not provide copy of Yoakum district map. We will have to get it ourselves.	7/15/2008
Socio/EJ Need for Power	2.5 – 19	RES	Confirm source for Table 2.5-9.		7/30/2008

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South Texas Project  
RAI Response Tracking

Subject	RAI No.	Status	RAI	Comments	Response Date
Socio/EJ Need for Power	2.5 – 20	RES	Provide data on all property tax collections, including a separation of STP payments.		7/30/2008
Socio/EJ Need for Power	2.5 – 21	RES	Estimate the degree of congestion for key road links approaching STP.		7/15/2008
Socio/EJ Need for Power	2.5 – 22	RES	Describe planned road upgrades on the commuting routes to STP.		7/15/2008
Socio/EJ Need for Power	2.5 – 23	RES	Discuss the environmental and socioeconomic impacts of upgrading the rail spur.		7/15/2008
Socio/EJ Need for Power	2.5 – 24	RES	Discuss seasonal low water issues with using the STP barge slip.		7/15/2008
Socio/EJ Need for Power	2.5 – 25	RES	Provide an explanation as to why maximum water treated exceeds rated capacity in Table 2.5-30.		7/30/2008
Socio/EJ Need for Power	2.5 – 26	RES	Determine whether the population forecasts in the TX Water Plan are consistent with those in the demographic section.		7/30/2008
Socio/EJ Need for Power	2.5 – 27	RES	List private schools within 50 miles of STP, including specific details of each.		7/2/2008
Socio/EJ Need for Power	2.5 – 28	RES	Reconcile employment numbers for major employers.		7/30/2008
Socio/EJ Need for Power	2.5 – 29	RES	Provide revenue and expenditure data for the City of Palacios.		7/15/2008
Socio/EJ Need for Power	4.4 – 1	RES	Add a month by month table of projected "workers on site".		7/30/2008
Socio/EJ Need for Power	4.4 – 2	RES	Reconcile construction-period employment assumptions.		7/30/2008

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South Texas Project  
RAI Response Tracking

Subject	RAI No.	Status	RAI	Comments	Response Date
Socio/EJ Need for Power	4.4 – 3	RES	Re–calculate wage impacts using more realistic wage rates.		8/14/2008
Socio/EJ Need for Power	4.4 – 4	RES	Revise estimated impacts of post–construction job and income losses.		7/30/2008
Socio/EJ Need for Power	4.4 – 5	RES	Further explain the land conversion assumption presented in Section 4.4.2 of the ER.		7/30/2008
Socio/EJ Need for Power	4.4 – 6	RES	Re–calculate traffic impacts based on more realistic assumptions.		7/15/2008
Socio/EJ Need for Power	4.4 – 7	RES	Calculate traffic impacts in congestion terms, not just impacts on pavements.		7/15/2008
Socio/EJ Need for Power	4.4 – 8	RES	Calculate traffic interactions between STP and hurricane evacuations.		7/15/2008
Socio/EJ Need for Power	4.4 – 9	RES	Discuss the impacts of any interactions between the re–built rail spur and road traffic, especially on FM 521.		7/15/2008
Socio/EJ Need for Power	4.4 – 10	RAI	Discuss the impact of construction on housing demand.	In our interviews with local officials, there was considerable informal knowledge concerning the locations of trailer courts during STP 1 & 2 construction, though none of this information was quantitative. If the information is not actually available, so be it.	7/15/2008
Socio/EJ Need for Power	4.4 – 11	RES	Discuss impact of STP 3 & 4-related population growth on social services demands.		7/15/2008
Socio/EJ Need for Power	4.4 – 12	RAI	Describe impacts of overlapping construction and operations workforces.	They didn't quite answer whether the net total effect of operations workforce would be greater or less than the construction workforce.	7/30/2008
Socio/EJ Need for Power	4.4 – 13	RES	Estimate expenditures within the region for materials and services during construction.		7/15/2008
Socio/EJ Need for Power	4.4 – 14	RES	Provide a copy of any studies of the socioeconomic impacts on Calhoun and Jackson Counties.		8/14/2008

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South Texas Project  
RAI Response Tracking

Subject	RAI No.	Status	RAI	Comments	Response Date
Socio/EJ Need for Power	4.4 – 15	RES	List commitments to reduce physical impacts of construction.		7/15/2008
Socio/EJ Need for Power	4.4 – 16	RES	List commitments to reduce traffic impacts of construction.		7/15/2008
Socio/EJ Need for Power	4.4 – 17	RES	List commitments to reduce physical impacts of construction.		7/15/2008
Socio/EJ Need for Power	4.4 – 18	RES	Provide a copy of RIMS II multipliers used.		7/30/2008
Socio/EJ Need for Power	4.4 – 19	RES	Provide information on any pre-existing health conditions among minority and low-income populations that could result in disproportionate adverse health impacts.		7/2/2008
Socio/EJ Need for Power	4.6 – 2	RES	Indicate which actions to limit adverse impacts during construction are commitments.		7/15/2008
Socio/EJ Need for Power	5.8 – 1	RES	Estimate expenditures within the region for materials and services during operation.		7/15/2008
Socio/EJ Need for Power	5.8 – 2	RES	Estimate tax yields during operations.		7/15/2008
Socio/EJ Need for Power	5.8 – 3	RES	Estimate maximum road congestion during operations.		7/15/2008
Socio/EJ Need for Power	5.8 – 4	NFA	Estimate housing impacts using latest population data.	We will check state and American Community survey ourselves.	7/15/2008
Socio/EJ Need for Power	5.10 – 1	NFA	Indicate which actions to limit adverse impacts during operation are commitments.	None are commitments, so they can't take credit for them as mitigation.	7/2/2008
Socio/EJ Need for Power	8.0 – 1	RES	Clarify ownership of STP Units 3 & 4.		7/2/2008

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South Texas Project  
RAI Response Tracking

Subject	RAI No.	Status	RAI	Comments	Response Date
Socio/EJ Need for Power	9.3 – 6	RES	Reconcile conflicting socioeconomic impact levels for the Limestone site.	Note: On socioeconomic grounds, now preferred to STP Site	7/2/2008
Socio/EJ Need for Power	9.3 – 7	RES	Reconcile conflicting socioeconomic impact levels for the Allens Creek site.	Note: On socioeconomic grounds, now preferred to STP Site	7/2/2008
Socio/EJ Need for Power	9.3 – 8	RES	Reconcile conflicting socioeconomic impact levels for the Malakoff site.	Note: On socioeconomic grounds, now preferred to STP Site	7/2/2008
LWA	10.5S – 3	RAI	Limited Work Authorization for Nuclear Power Plants	The 540 acre figure at p. 2 of Attachment 21 for land disturbed on long-term or short-term basis is not consistent with the 768 acre figure in Table 4.1-1 of the ER. That discrepancy will require some explanation from STPNOC. The NRC will need to determine the acceptability of the % breakdown in Table 4.6-2 of Attachment 21.	8/14/2008

South Texas Project  
RAI Response Tracking

RAI No.	Status	Subject	RAI	Comments	Response Date
2.2 – 1	RES	Hydrology	Provide a more complete description of mineral and petroleum resources in Matagorda County adjacent to the proposed facilities. The presence of petroleum wells in the vicinity of the site makes it necessary to explain why there are no mineral or petroleum “resources adjacent to or within the site boundary presently being exploited or of known commercial value.” Provide a more complete statement on the control of mineral rights, and, hence, the control of future drilling at the STP site.		7/2/2008
2.2.1 – 1	RES	Land Use Alt Sites	Revise Tables 2.2–1 and 2.2–2 in the ER to reflect land occupied by STP units 1 and 2 and auxiliary facilities.		7/2/2008
2.3 – 1	NFA	Hydrology	Provide USACE documentation regarding the status of the MCR as waters of the US.	The question whether the MCR is waters of the US is still open and being considered by the USACE. The staff may need to assume that the USACE determination will be affirmative (that the MCR is waters of the US) and carry out its independent impact assessment accordingly.	7/30/2008
2.3 – 2	RAI	Hydrology	Describe the existing storm water treatment and outfalls, and the water bodies into which they discharge.	The response seems adequate. The staff needs a better copy of Figure 1-1 from STPNOC 2004 Storm Water Pollution Prevention Plan included in the response.	7/2/2008
2.3 – 3	RAI	Hydrology	Provide information regarding water rights under severe droughts.	From STPNOC's response, it is not clear who STPNOC will request the emergency relief from under the stipulations of Texas Water Code Section 11.148. The staff needs to clarify the response from STPNOC, or to independently find this information.	7/2/2008
2.3 – 4	NFA	Hydrology	Provide water use requirements downstream of the STP intake.	The response seems adequate although there is some confusion caused by quoting selected sentences from the Matagorda Bay Freshwater Inflow Needs Study. The staff needs to review this study.	7/2/2008

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South Texas Project  
RAI Response Tracking

RAI No.	Status	Subject	RAI	Comments	Response Date
2.3 – 5	NFA	Hydrology	Provide the location and other pertinent data for the salinity wedge in the Colorado River during various discharges.	The response seems adequate. The staff needs to check the MCR water quality modeling inputs to see if the salinity data included as part of the RAI response are appropriately used.	7/2/2008
2.3 – 6	RAI	Hydrology	Provide details of MCR operation during existing two-unit and future four-unit operation to help staff independently estimate water-use and water-quality impacts.	The modeling effort is underway, but will not be finished before the end of 2008. There is the possibility that the modeling effort may not answer some of the questions we have regarding assessment of impacts on the MCR and on the Colorado River after they submit, and we review, the completed response to RAI 2.3-6 by end of the year (realistically January 2009). It would be helpful to get an idea how they are developing the MCR models and how they plan to use them to assess the impacts. I do not want to be telling them in January that their models need substantial tweaking.	8/14/2008
2.3 – 7	RAI	Hydrology	Provide details of the process followed in the selection of the site hydrogeologic conceptual model.	The process description is good, but could be interpreted as leading to a single alternative conceptual model. The process described does not explicitly describe the alternate conceptual models considered, and the logic that produced the plausible conservative conceptual model on which analyses are based. A contradiction exists in item (a) Drawdown at offsite wells. It states that based on the conceptual model and drawdown during construction dewatering and water production there "may" be potential impacts to offsite wells. It also states that drawdown during dewatering will "remain within the STP site boundaries." Consequently, based on these statements, it is not clear what impacts from dewatering are expected. Also, since drawdown values are presented, it will be necessary to review calculation packages.	7/2/2008

South Texas Project  
RAI Response Tracking

RAI No.	Status	Subject	RAI	Comments	Response Date
2.3 – 8	RAI	Hydrology	Provide groundwater observations for a sufficiently long period to reveal seasonal trends. If available, also provide long-term trend data on groundwater in the vicinity of the proposed facility.	The RAI response and proposed revision includes the revised table providing the groundwater observations revealing seasonal trends; however, the series of figures (Figure 2.3.1-25) showing quarterly aquifer response to stress should also be revised to show the full year seasonal response in the data set. The current figure shows February and April results only.	7/2/2008
2.3 – 9	RES	Hydrology	Provide construction details, purpose, and function of relief wells surrounding the MCR.		7/30/2008
2.3 – 10	RES	Hydrology	Address inconsistency in ER text with respect to hydraulic conductivities presented in Figure 2.3.1–32.		7/2/2008
2.3 – 11	NFA	Hydrology	Address the inconsistency between the 1985 forecast of a decline in groundwater use in Matagorda County against currently available county data on groundwater use. Provide a projection of future groundwater use in Section 2.3.2.2, and provide a breakdown of water demand, described in Table 2.3.2-6, between that to be provided by surface water and groundwater resources.	Based on the RAI response, the NRC will state that STP plans to use its full groundwater permitted amount (3000 acre-ft/yr, 1860 gpm) with additional water requirements for specific purposes being provided from the MCR. Also, based on information from the CPGCD, the NRC will note that the permitted groundwater use level is shown as an annual average, but is actually a 5-yr commitment. Accordingly, higher than average annual usage in one year can be balanced against lower usage years within the 5-yr permit period. The NRC will check further to learn of the groundwater usage estimated for the STP in the North Gulf Coast Aquifer GAM. Reliance on the GAM results will, in part, rely on the use of the full groundwater allotment of 3000 acre-ft/yr in the model.	7/15/2008
2.3 – 12	NFA	Hydrology	Provide an analysis of the sustainable groundwater resource.	The NRC will contact the CPGCD and reflect in the EIS their view of the potential to satisfy peak demand for outages through an increased permitted groundwater allotment for short-term uses.	7/15/2008
2.3 – 13	RES	Hydrology	Provide a clarification on the role of production wells related to groundwater pathway and impact on the deep aquifer.		7/2/2008

RES = resolved; NFA = no further action; RAI = additional information needed

South Texas Project  
RAI Response Tracking

RAI No.	Status	Subject	RAI	Comments	Response Date
2.3 – 14	RES	Hydrology	Provide a description of the STP groundwater monitoring program.		7/2/2008
2.3 – 15	RES	Hydrology	Provide definitive information regarding known or assumed tritium sources.		7/15/2008
2.4.1 – 1	RES	Terres Ecology	Provide information regarding terrestrial species composition and abundance by habitat type on the STP site.		8/14/2008
2.4.1 – 2	RES	Terres Ecology	Provide current information on the type and relative abundance of migratory bird species and waterfowl using the habitats on the STP site, potential impacts to these populations, and proposed mitigation measures to limit impacts during construction and operation.		8/14/2008
2.4.1 – 3	RAI	Terres Ecology	Provide information and maps depicting all wetlands identified on the STP site during field surveys in 2006, 2007 and 2008.	Response did not provide any new data or information. see below "The results of these surveys were submitted in a preliminary report to USACE on April 9, 2008. The classifications of these wetlands and water bodies (primarily ditches) are pending confirmation of the STPNOC determination by USACE. Requested data from these sites will be submitted after receipt of the USACE response."	8/14/2008
2.4.1 – 4	RAI	Terres Ecology	Provide updated information describing and mapping water features and related wetland features on the STP site.	Response did not provide any new data or information. see below "The results of these surveys were submitted in a preliminary report to USACE on April 9, 2008. The classifications of these wetlands and water bodies (primarily ditches) are pending confirmation of the STPNOC determination by USACE. Requested data from these sites will be submitted after receipt of the USACE response."	8/14/2008

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South Texas Project  
RAI Response Tracking

RAI No.	Status	Subject	RAI	Comments	Response Date
2.4.1 – 5	RAI	Terres Ecology	Provide graphics that illustrate the salt deposition isopleths overlaid on existing habitat maps and wetland maps.	They did respond to the question, but it appears that the question is moot given potential design changes. A new figure will be developed once site layout/design changes are complete. Also, the figure only identifies wetlands, does not show the existing terrestrial habitats that would be impacted by a the salt plume deposition--so is deficient.	7/30/2008
2.4.2 – 1		Aquatic Ecology	Provide the results of the 12 months of aquatic resource sampling in the Colorado River.		9/16/2008
2.4.2 – 2	RAI	Aquatic Ecology	Describe the aquatic habitat features at the RMPF.	Most of the questions in the supporting information are adequate. However, at the STP site audit, ENSR described why some gear types for sampling could not be used at the RMPF. The RAI does not reflect the information described at the site audit and the ENSR 2008 report does not address this question either. Request further information on sampling activities specifically applied at the RMPF.	7/15/2008
2.4.2 – 3		Aquatic Ecology	Characterize the aquatic resources in the MCR.		9/16/2008
2.4.2 – 4	NFA	Aquatic Ecology	Describe the saltwater wedge at the RMPF (~NMM 8 on the Colorado River).	The response seems adequate. The staff needs to check the MCR water quality modeling inputs to see if the salinity data included as part of the RAI response are appropriately used.	7/2/2008
2.4.2 – 5	RAI	Aquatic Ecology	Discuss the uncertainties in evaluating the aquatic resources from past to current studies.	The response seems adequate. The staff needs to check the calculations based on Jaccard coefficients to support conclusions. Request raw data on monthly sampling to verify calculations.	7/2/2008
2.4.2 – 6	RES	Aquatic Ecology	In Table 2.4–2, what land area does the column, “STP Site”, include?		7/2/2008
2.4.2 – 7	RES	Aquatic Ecology	Provide correspondence with U.S. Fish and Wildlife Service, National Oceanic and Atmospheric Administration, and U.S. Army Corps of Engineers that has occurred since September 20, 2007.		7/2/2008

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South Texas Project  
RAI Response Tracking

RAI No.	Status	Subject	RAI	Comments	Response Date
2.4.2 – 8	NFA	Aquatic Ecology	Discuss the different classifications of wetlands on the STP site and the acreages associated with each.	The response addresses and clarifies the ER sections. However, further information on wetlands needs to be provided through consultation with ACE.	7/2/2008
2.4.2 – 9	RES	Aquatic Ecology	What requirements are there for Segment 1401 of the Colorado River associated with listing of the region as "impaired waters due to the presence of bacteria"?		7/2/2008
2.4.2 – 10	RES	Aquatic Ecology	Provide information on the application for the Coastal Consistency Determination for Units 3 & 4.		7/2/2008
2.5 – 1	NFA	Socio/EJ Need for Power	Provide an electronic copy of the Socioeconomics "Validation Package".	Validation package doesn't do us a whole lot of good in Texas. Unable to review.	7/2/2008
2.5 – 2	NFA	Socio/EJ Need for Power	Update population and growth rates based on post-2000 Census data.	We were hoping that they would at least test the forecasts against post-2000 estimates. Clearly they are not going to do that, so we will.	7/15/2008
2.5 – 3	RES	Socio/EJ Need for Power	Provide an estimate of transient population employment in the fishing industry.		7/2/2008
2.5 – 4	RAI	Socio/EJ Need for Power	Provide a discussion of important community social structures and organizations.	The applicant has taken the position that NUREG 1555 does not require any analysis of faith based or NGO social service providers. Their response was instead a short primer on the different ways governments are organized and then an interpretation of the NUREG's call for a discussion of social services (it was a mistake, apparently). However, the discussion does not absolve the applicant from its responsibility to provide sufficient information on the social structure of the affected area, the expected changes that might occur during construction and operations, to ensure that they have gotten it right in their ER.	8/14/2008
2.5 – 5	RES	Socio/EJ Need for Power	Identify public and private recreational facilities and opportunities, including present and projected capacity and percentage of use.		7/30/2008

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South Texas Project  
RAI Response Tracking

RAI No.	Status	Subject	RAI	Comments	Response Date
2.5 – 6	RAI	Socio/EJ Need for Power	Provide a discussion of non-zoning controls on land development	The response seems to be sufficient, except that there are no citations to support the discussion. The applicant needs to provide such documentation as to how they reached their conclusions.	8/14/2008
2.5 – 7	RES	Socio/EJ Need for Power	Provide a discussion of changes to anticipated levels of traffic identified by state transportation planners for Matagorda and surrounding counties.		7/15/2008
2.5 – 8	RES	Socio/EJ Need for Power	Provide a discussion of distinctive (e.g., minority, ethnic, religious) communities that exist in the area of the STP plant.		7/2/2008
2.5 – 9	RES	Socio/EJ Need for Power	Discuss contacts made with minority and low-income populations and state whether they identified any environmental concerns about STP Units 3 & 4.		7/2/2008
2.5 – 10	RES	Socio/EJ Need for Power	What is the projected use of outdoor recreational facilities near STP?		7/2/2008
2.5 – 11	RAI	Socio/EJ Need for Power	Confirm whether the 2000 Census is the most recent data available for housing availability in the counties near STP.	If the applicant is going to assert there are no differences except scale between the 2000 Census and more recent data, they will have to support that assertion by doing an analysis of the differences. In other words, they will have to prove their hypothesis by comparing 2000 Census data and more recent information (2005 Census updates, Texas statistics, etc., along with recent housing information available from sources other than Census). If this analysis does not support their hypothesis, then the applicant will have to revise their analysis based upon more recent data.	8/14/2008
2.5 – 12	RAI	Socio/EJ Need for Power	Discuss non-governmental service organizations located in Matagorda County and adjacent counties.	The applicant's response is another assertion that NGOs are not appropriate. Staff disagrees and requests the applicant provide the data requested. Their assertion that NGOs "are not directly impacted by project-induced changes to employment and, hence, changes in population" is incorrect and does not absolve the applicant from their responsibility to provide sufficient information to accept their analysis.	8/14/2008

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South Texas Project  
RAI Response Tracking

RAI No.	Status	Subject	RAI	Comments	Response Date
2.5 – 13	RES	Socio/EJ Need for Power	Discuss the participation in federal school free and low-cost lunch programs.		7/30/2008
2.5 – 14	RES	Socio/EJ Need for Power	Discuss the importance of local "roll-back" elections for ISD finances operating revenue.		7/30/2008
2.5 – 15	RES	Socio/EJ Need for Power	Discuss the outcome of the Moak, Casey, and Associates study and provide a copy.		7/15/2008
2.5 – 16	RES	Socio/EJ Need for Power	Describe the tax impact of the expanding San Antonio share of the STP 1 & 2, and impact of STP 3 & 4.		7/30/2008
2.5 – 17	NFA	Socio/EJ Need for Power	Describe the future impact of the growth in electricity production on water demand in the Colorado River.	We may have to seek the information on projects from the State Water Board	7/30/2008
2.5 – 18	NFA	Socio/EJ Need for Power	Clarify contents and provide copies of references 2.5-14, 2.5-15, and 2.5-17.	Did not provide copy of Yoakum district map. We will have to get it ourselves.	7/15/2008
2.5 – 19	RES	Socio/EJ Need for Power	Confirm source for Table 2.5-9.		7/30/2008
2.5 – 20	RES	Socio/EJ Need for Power	Provide data on all property tax collections, including a separation of STP payments.		7/30/2008
2.5 – 21	RES	Socio/EJ Need for Power	Estimate the degree of congestion for key road links approaching STP.		7/15/2008
2.5 – 22	RES	Socio/EJ Need for Power	Describe planned road upgrades on the commuting routes to STP.		7/15/2008
2.5 – 23	RES	Socio/EJ Need for Power	Discuss the environmental and socioeconomic impacts of upgrading the rail spur.		7/15/2008

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South Texas Project  
RAI Response Tracking

RAI No.	Status	Subject	RAI	Comments	Response Date
2.5 – 24	RES	Socio/EJ Need for Power	Discuss seasonal low water issues with using the STP barge slip.		7/15/2008
2.5 – 25	RES	Socio/EJ Need for Power	Provide an explanation as to why maximum water treated exceeds rated capacity in Table 2.5-30.		7/30/2008
2.5 – 26	RES	Socio/EJ Need for Power	Determine whether the population forecasts in the TX Water Plan are consistent with those in the demographic section.		7/30/2008
2.5 – 27	RES	Socio/EJ Need for Power	List private schools within 50 miles of STP, including specific details of each.		7/2/2008
2.5 – 28	RES	Socio/EJ Need for Power	Reconcile employment numbers for major employers.		7/30/2008
2.5 – 29	RES	Socio/EJ Need for Power	Provide revenue and expenditure data for the City of Palacios.		7/15/2008
2.6 – 1	RAI	Hydrology	Provide a summary of past and expected surface settlements and how future settlements may impact surface water drainages, a description of various dewatering options, and relative settlements expected for each dewatering option.	The response draws heavily on the assumed similarity of construction dewatering for existing STP Units 1&2 and proposed STP Units 3&4. A summary comparison of the two events is needed to support this assumption. Information to be included would be the area dewatered, depth of dewatering, duration of dewatering, and measured and expected dewatering production rate.	7/2/2008
2.7 – 1	NFA	Met/AQ Accidents	Provide a climatological summary of the STP meteorological data.	Further pursuit of this is not going to be worth the effort.	7/15/2008
2.7 – 2	RAI	Met/AQ Accidents	Discuss the likelihood that the combination of the MCR and the STP Unit 3 & 4 cooling towers will have a synergistic effect that increases the frequency or intensity of fog.	Response does not address changes in location of cooling towers. Will have to be revisited to include consideration of the revised cooling tower location.	7/15/2008
2.7 – 3	RAI	Met/AQ Accidents	Describe which PAVAN files were used and how the 50% X/Q values were derived.	Response needs further amplification. Not clear that the approach can be used to give the 50% X/Q values.	7/15/2008

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South Texas Project  
RAI Response Tracking

RAI No.	Status	Subject	RAI	Comments	Response Date
2.7 – 4	RES	Met/AQ Accidents	Explain why the XOQDOQ results presented in the FSAR differ from the results presented in the ER.		7/15/2008
2.7 – 5	RAI	Met/AQ Accidents	Interpret the word “may” as it relates to actions to mitigate potential impacts of construction on air quality.	In general, initial RAI response ok. However, the response raises the issue of a "Construction Environmental Control Plan." Need more information about that plan. When? Who? External review and approval?	7/2/2008
3.4.1 – 1	NFA	Met/AQ Accidents	Provide a citation for the estimated cooling tower noise level of about 57 dBA.	The RAI response is an attempt to side step the issue. Continued pursuit of information not likely to be of much value.	7/2/2008
3.5 – 1	RES	Rad. Health	Provide explanations and calculations, as appropriate, of the inputs to the LADTAP, GASPAP, and construction worker dose calculation. One acceptable way to respond to this RAI would be to provide the calculation packages.		7/2/2008
3.7 – 1	RES	Trans Lines	Explain whether the replacement of transmission line towers would result in impacts outside existing transmission line corridors.		7/30/2008
4.1.3 – 1	RES	Cult Res	Provide the plant procedure for inadvertent discovery of archaeological remains.		6/4/2008
4.2 – 1	RES	Hydrology	Describe water resources that may be impacted along the transmission line.		7/15/2008
4.2 – 2	RES	Hydrology	Describe construction–related water quality impacts to hydrologic features.		7/15/2008
4.2 – 3	RES	Hydrology	Provide information regarding the Erosion and Sediment Control Plan and Storm Water Management Plan.		7/15/2008
4.2 – 4	RES	Hydrology	Describe the impacts of new pump installation activities.		7/15/2008

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South Texas Project  
RAI Response Tracking

RAI No.	Status	Subject	RAI	Comments	Response Date
4.2 – 5	RAI	Hydrology	Provide information regarding the locations of drainage ditches and retention ponds.	The RAI response states that the final location of the main drainage ditch, which is to be relocated north of the STP Units 3 and 4, is still undetermined. The staff were provided a map by Russ Kiesling of STPNOC where the location of the MDC was sketched. The staff needs to clarify if the RAI response is consistent with that map.	7/15/2008
4.2 – 6	RAI	Hydrology	Describe the analytical process used to determine impacts to surface water hydrology would be SMALL.	The RAI response details what would be done during construction of STP Units 3 and 4. There is still no description of the process or the bases used to determine that the impacts on surface water from these activities are SMALL. The argument presented still is that the impacts will be SMALL since the activities are allowed under a state or a federal permit. The staff does not have enough information to carry out its own independent assessment of the level of the impact from construction as required by 10 CFR 51.71(d).	7/2/2008
4.2 – 7	RAI	Hydrology	Provide a list and description of pre-construction activities mentioned in ER Section 1.1.2.7.	Power Block Earthwork is mentioned as a pre-construction activity. Structural fill will be placed in some of the excavations. Also, it seems that the fabrication of the reactor building base mat reinforcing module would occur prior to the COL being granted. The staff needs clarification if these activities could be called "pre-construction" under the new LWA rule.	7/15/2008

South Texas Project  
RAI Response Tracking

RAI No.	Status	Subject	RAI	Comments	Response Date
4.2 – 8	RAI	Hydrology	Provide a map or drawing showing the extent of the excavations, and how close they will come to STP 1 & 2, the MCR, and wetlands. Describe the dewatering and excavation process.	The ER describes two excavations 900'x950' for the units, and one 650'x550' for the ultimate heat sink. The RAI response states that dewatering has been analyzed assuming a 1200'x650' excavation. The RAI response also states that the requested map of excavations can not be provided. The information in the ER and RAI response appears to be contradictory. It is not possible to fit two 900'x950' excavations into a 1200'x650' hypothetical excavation. The staff need a basis for performing a bounding calculation of dewatering impact, and this RAI response does not provide it. Without a site map showing the relative position of excavations it is not possible to put forward a single excavation that would bound all excavations.	7/15/2008
4.2 – 9	NFA	Hydrology	Why is the lower value of subsidence estimates used?	Staff will mention the commitment of STP to monitor groundwater levels, and dewatering pumping rates, and to react appropriately with modifications to the dewatering plan (e.g., including the construction of cutoff walls) to limit potential impacts to nearby surface drainage and facilities.	7/15/2008
4.2 – 10	RAI	Hydrology	Demonstrate the lack of connectivity between dewatering wells and the wetlands and shallow surface water features.	Staff will mention the willingness of STP to monitor groundwater and surface features in the vicinity of the dewatering activity, and, if significant impacts are observed, STP's willingness to implement remedies including supplementing flow to the wetlands and installing cutoff walls. However, STP's statement that "... dewatering activities could be monitored during dewatering activities to determine if dewatering activities are impacting surface water features ..." needs to be clarified. Staff need to be able to refer to monitoring and possible remedies as a commitment by STP. Thus, an RAI is needed.	7/15/2008
4.2 – 11	RAI	Hydrology	Provide a full description of the potential impacts to nearby groundwater users.	While the response is adequate, it would appear that review of a calculation package will be necessary to check the potential drawdown values included in the RAI response.	7/15/2008

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South Texas Project  
RAI Response Tracking

RAI No.	Status	Subject	RAI	Comments	Response Date
4.2 – 12	NFA	Hydrology	Present an evaluation or validation of the model shown at the beginning of Section 4.2.2.1.	While the response is adequate, it would appear that review of a calculation package will be necessary to check the potential drawdown values included in the RAI response. Access to the calculation package will be requested under the follow-on to RAI 4.2-11.	7/15/2008
4.2 – 13	RES	Hydrology	Provide information regarding dewatering discharge locations, any required ditches and retention ponds and associated permits, storm water outfalls, storm water treatment, and water bodies into which storm water will be discharged.		8/14/2008
4.3.1 – 1	RES	Terres Ecology	Identify and discuss habitats and important species associated with the 20-mile upgrade section of the Hillje transmission corridor.		7/15/2008
4.3.1 – 2	RAI	Terres Ecology	Provide information and figures describing the proposed locations of various construction project areas and activities and describe associated impacts to terrestrial resources.	The RAI was answered; however, the RAI refers to a figure that was not supplied in the response. Figure 3.9S-1, which applicant states "will be changed accordingly" due to changes in the locations of various construction activities that have occurred since ER Rev. 1, needs to be provided.	8/14/2008
4.3.2 – 1	NFA	Aquatic Ecology	What are the requirements for dredging in the Colorado River under the existing permits with the U.S. Corps of Engineers?	Requested the correspondence, but was provided instead with summary of information presumably from the correspondence.	7/15/2008
4.3.2 – 2	RES	Aquatic Ecology	Provide specific examples of activities that will reduce impacts to aquatic resources associated with the Erosion and Sediment Control Plan and Storm Water Management Plan.		7/2/2008
4.3.2 – 3	NFA	Aquatic Ecology	What are the impacts from construction activities on aquatic resources associated with surface water and drainage ditches?	The response is adequate. Need to re-evaluate when further information from ACE on the slough and ditches are available.	7/2/2008

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South Texas Project  
RAI Response Tracking

RAI No.	Status	Subject	RAI	Comments	Response Date
4.3.2 – 4	RAI	Aquatic Ecology	Provide information and figures describing the proposed locations of various construction project areas and activities and describe associated impacts to aquatic resources.	The RAI was answered. However, the RAI refers to a figure that was not supplied in the response. Figure 3.9S-1, which applicant states "will be changed accordingly" due to changes in the locations of various construction activities that have occurred since ER Rev. 1, needs to be provided.	7/2/2008
4.4 – 1	RES	Socio/EJ Need for Power	Add a month by month table of projected "workers on site".		7/30/2008
4.4 – 2	RES	Socio/EJ Need for Power	Reconcile construction-period employment assumptions.		7/30/2008
4.4 – 3	RES	Socio/EJ Need for Power	Re-calculate wage impacts using more realistic wage rates.		8/14/2008
4.4 – 4	RES	Socio/EJ Need for Power	Revise estimated impacts of post-construction job and income losses.		7/30/2008
4.4 – 5	RES	Socio/EJ Need for Power	Further explain the land conversion assumption presented in Section 4.4.2 of the ER.		7/30/2008
4.4 – 6	RES	Socio/EJ Need for Power	Re-calculate traffic impacts based on more realistic assumptions.		7/15/2008
4.4 – 7	RES	Socio/EJ Need for Power	Calculate traffic impacts in congestion terms, not just impacts on pavements.		7/15/2008
4.4 – 8	RES	Socio/EJ Need for Power	Calculate traffic interactions between STP and hurricane evacuations.		7/15/2008
4.4 – 9	RES	Socio/EJ Need for Power	Discuss the impacts of any interactions between the re-built rail spur and road traffic, especially on FM 521.		7/15/2008

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South Texas Project  
RAI Response Tracking

RAI No.	Status	Subject	RAI	Comments	Response Date
4.4 – 10	RAI	Socio/EJ Need for Power	Discuss the impact of construction on housing demand.	In our interviews with local officials, there was considerable informal knowledge concerning the locations of trailer courts during STP 1 & 2 construction, though none of this information was quantitative. If the information is not actually available, so be it.	7/15/2008
4.4 – 11	RES	Socio/EJ Need for Power	Discuss impact of STP 3 & 4-related population growth on social services demands.		7/15/2008
4.4 – 12	RAI	Socio/EJ Need for Power	Describe impacts of overlapping construction and operations workforces.	They didn't quite answer whether the net total effect of operations workforce would be greater or less than the construction workforce.	7/30/2008
4.4 – 13	RES	Socio/EJ Need for Power	Estimate expenditures within the region for materials and services during construction.		7/15/2008
4.4 – 14	RES	Socio/EJ Need for Power	Provide a copy of any studies of the socioeconomic impacts on Calhoun and Jackson Counties.		8/14/2008
4.4 – 15	RES	Socio/EJ Need for Power	List commitments to reduce physical impacts of construction.		7/15/2008
4.4 – 16	RES	Socio/EJ Need for Power	List commitments to reduce traffic impacts of construction.		7/15/2008
4.4 – 17	RES	Socio/EJ Need for Power	List commitments to reduce physical impacts of construction.		7/15/2008
4.4 – 18	RES	Socio/EJ Need for Power	Provide a copy of RIMS II multipliers used.		7/30/2008
4.4 – 19	RES	Socio/EJ Need for Power	Provide information on any pre-existing health conditions among minority and low-income populations that could result in disproportionate adverse health impacts.		7/2/2008

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South Texas Project  
RAI Response Tracking

RAI No.	Status	Subject	RAI	Comments	Response Date
4.5 – 1	RES	Rad. Health	Discuss rationale for comparing construction worker doses to 40 CFR 190 criteria.		7/2/2008
4.5 – 2	RES	Rad. Health	Discuss rationale for comparing construction worker doses to 10 CFR 50 Appendix I criteria.		7/2/2008
4.5 – 3	RES	Rad. Health	What was the thought process for using Units 1 & 2 Annual Effluent Report data for 2005 to calculate air pathway doses to construction workers?		7/2/2008
4.6 – 1	RAI	Aquatic Ecology	Describe the planned control program to mitigate construction-related impacts to aquatic ecosystems from suspended sediments.	The response does not address the question. Section 4.6-1 is a table of "planned control programs". Response does not address question. When response to RAI 4.2-13 is received, the staff will re-evaluate the need for further RAIs.	7/2/2008
4.6 – 2	RES	Socio/EJ Need for Power	Indicate which actions to limit adverse impacts during construction are commitments.		7/15/2008
5.2 – 1	NFA	Hydrology	Discuss the incremental change in the availability of the water resource, and the incremental change in groundwater drawdown as an impact of station operation on potential water users.	With regard to surface water resources, the response seems adequate. The staff will need to review the MCR water budget model to ensure that this response is consistent with the MCR operation policy implemented in the model. The model results would provide the incremental year-to-year impact to water resources due to operation of STP Units 3 and 4 that may be more severe than the ~7.5% of the 2060 available water in the Colorado Basin stated in this RAI response. With regard to the groundwater resource, the response in RAI 2.3-12 is adequate and requires No Further Action by the applicant.	7/15/2008
5.2 – 2	RES	Hydrology	Address inconsistencies in the ER regarding groundwater impact levels.		7/15/2008
5.2 – 3	RES	Hydrology	Describe quantitatively the known impacts and qualitatively the potential future impacts on the groundwater system.		7/15/2008

RES = resolved; NFA = no further action; RAI = additional information needed

South Texas Project  
RAI Response Tracking

RAI No.	Status	Subject	RAI	Comments	Response Date
5.3.1.2 – 1	RAI	Aquatic Ecology	Describe the design feature of the RMPF that allows an “escape route” for fish to swim back to the river and precluding entrapment.	While response is complete, more questions arise from the response. Response states that fish return system is blocked at high river flows to prevent plugging from debris. ER states that pumping at RMPF occurs only at high flows. Thus, the fish return system must not be operational when pumping at RMPF, and impact to aquatic organisms must be greater than stated in ER. Follow on RAI needed to confirm new information and impact assessment assumptions.	7/15/2008
5.3.1.2 – 2	RAI	Aquatic Ecology	Describe the process for calculating the maximum design approach velocity at the traveling screens on the RMPF for four units and provide the results of the calculations.	Response did not provide data requested to validate important design parameters. Follow on RAIs will ask more specifically for information used in ER and other references.	7/15/2008
5.3.1.2 – 3	RAI	Aquatic Ecology	What is the magnitude of impingement and entrainment of aquatic species at the RMPF for the species of fish currently found in the Colorado River compared to species present prior to 1993 when the diversion channel directed the river into East Matagorda Bay?	The response does not address the question. ENSR 2008 study was not designed to estimate impingement and entrainment. The response does not try to make a case based on EPA Clean Water Act 316(b) analyses. The response is also confusing because the 9th paragraph (on page 3 of 4, Attachment 14) implies that the information is on the Main Cooling Pond, but the reference (ENSR 2008) is the Colorado River report.	8/14/2008
5.3.1.2 – 4	NFA	Aquatic Ecology	What is the impact of operation of the RMPF on managed species included in the Fisheries Management Plans for the Gulf of Mexico?	While the response is difficult to understand, there is enough information at this time to proceed with EFH consultation with NMFS.	8/14/2008
5.3.1.2 – 5	RES	Aquatic Ecology	Please describe the proposed bank stabilization project and its impact on terrestrial and aquatic resources.		8/14/2008
5.3.2 – 1	RES	Aquatic Ecology	Provide information on how aquatic resources may be impacted by discharges at outfall 001.		8/14/2008
5.3.2 – 2	NFA	Aquatic Ecology	How will water discharged at outfall 001 be evaluated and compliance with TCEQ permit # WQ0001908000 be determined?	Response is not consistent with information provided at site audit. Will address further when information from RAI 2.3-6 (the MCR water quality model results) is received.	7/15/2008

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South Texas Project  
RAI Response Tracking

RAI No.	Status	Subject	RAI	Comments	Response Date
5.3.2 – 3	RAI	Aquatic Ecology	What is the impact of outfall 001 and discharge from the MCR on managed species included in the Fisheries Management Plans for the Gulf of Mexico?	Response did not consider fish passage during discharge. Information on the configuration of the river bottom was not considered.	7/2/2008
5.3.3.1 – 1	RAI	Met/AQ Accidents	Justify the assumption in the 2nd paragraph of ER Section 5.3.3.1.2 that there will not be increased fogging.	Response relies on monthly average values of temperature increase in pond to support assumption. The monthly average values indicate a 37% increase in saturation vapor pressure of the MCR during the winter and a bout a 7% increase in radiative heat loss. The justification for there assumption that there will be no impact on fogging is not convincing.	7/30/2008
5.3.3.1 – 2	RES	Met/AQ Accidents	Provide consistent values for cooling tower drift deposition at the Unit 3&4 switchyard.		7/2/2008
5.3.4 – 1	RES	Aquatic Ecology	What are the annual maximum and minimum flow rates and temperatures for the Colorado River in the vicinity of the blowdown structure on the Colorado River? What is the frequency planned for discharging at outfall 001?		8/14/2008
5.3.4 – 2	RES	Aquatic Ecology	Identify the recreational uses within Segment 1401 of the Colorado River and discuss the potential for exposure to thermophilic microorganisms via the thermal plume associated with outfall 001.		7/15/2008
5.3.4 – 3	RES	Aquatic Ecology	Provide documentation of any correspondence with the Texas Department of State Health Services in support of the evaluation of thermophilic microorganisms in the vicinity of the discharge from the MCR into the Colorado River.		7/2/2008
5.3.4 – 4	NFA	Aquatic Ecology	How does the state's designation of Segment 1401 of the Colorado River as "impaired" relate to the impact evaluation?	Links with 2.4.2 - 10. Not all accurate, but usable.	7/2/2008

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South Texas Project  
RAI Response Tracking

RAI No.	Status	Subject	RAI	Comments	Response Date
5.4.1 – 1	RES	Rad. Health	What source term was used for the LADTAP input file "LADTROB2.DAT"?	STP states, "The header line preceding the source terms ... was not revised from initial analyses and incorrectly notes that the source terms are based on DCD Table 12.2-22." They will also update ER section 5.4.1 with correct reference and the FSAR will be updated to include the additional radionuclides (Ag-110-m and Sb-124).	7/2/2008
5.4.1 – 2	NFA	Rad. Health	Why does the ABWR DCD table 12.2–22 not match the FSAR table 12.2–22	STP will include Ag-110-m and Sb-124 in the FSAR, but did not mention updating the Nd-147 in the ABWR DCD.	7/2/2008
5.4.1 – 3	NFA	Rad. Health	What is the basis and where did the source term for LADTROB2.DAT come from?	STP said they started with 55 nuclides from DCD table 12.2-22 but removed 9 radionuclides that had ZERO release to MCR and another 9 that had ZERO fractions reaching Little Robins Slough. And supplemental LADTAP runs which included Np-239 showed the dose contribution as negligible. However, it would be nice to see the corrected results in the COLA revision.	7/2/2008
5.4.1 – 4	NFA	Rad. Health	Where did the source term for LADTROB2.DAT come from?	STP said they started with 55 nuclides from DCD table 12.2-22 but removed 9 radionuclides that had ZERO release to MCR and another 9 that had ZERO fractions reaching Little Robins Slough. And supplemental LADTAP runs which included Np-239 showed the dose contribution as negligible. HOWEVER, it would be nice to see the corrected results in the COLA revision.	7/2/2008
5.4.4 – 1	NFA	Rad. Health	What effect will raising the MCR level by 2 feet, have on the migration of radionuclides from MCR to Little Robbins Slough?	STP's response was that the ODCM calculation of radionuclide migration to Little Robbins Slough is conservative because MCR operates at 150,000 Ac-ft of water for 2 unit operation and will increase to about 202,700 Ac-ft when the level is raised 2 ft - this will effectively dilute the radionuclide concentrations in MCR. The dilution of radionuclides in MCR has greater effect than the 6% increase in pressure head will have on migration out of MCR. "In any case, the reservoir was designed for 4-unit operation and since the ODCM seepage analysis assumes design stage estimates, the liquid discharge flow to Little Robbins Slough used in the ER is valid."	7/2/2008

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South Texas Project  
RAI Response Tracking

RAI No.	Status	Subject	RAI	Comments	Response Date
5.8 – 1	RES	Socio/EJ Need for Power	Estimate expenditures within the region for materials and services during operation.		7/15/2008
5.8 – 2	RES	Socio/EJ Need for Power	Estimate tax yields during operations.		7/15/2008
5.8 – 3	RES	Socio/EJ Need for Power	Estimate maximum road congestion during operations.		7/15/2008
5.8 – 4	NFA	Socio/EJ Need for Power	Estimate housing impacts using latest population data.	We will check state and American Community survey ourselves.	7/15/2008
5.10 – 1	NFA	Socio/EJ Need for Power	Indicate which actions to limit adverse impacts during operation are commitments.	None are commitments, so they can't take credit for them as mitigation.	7/2/2008
5.10 – 2	RES	Aquatic Ecology	Explain the difference regarding the potential impact significance for water quality impacts found in Table 5.10-1 and the determination stated in the text of Section 5.2.3.		7/2/2008
5.10 – 3	RES	Aquatic Ecology	Explain the difference in the planned control program information for the discharge system and the description of temperature limits for TPDES Permit No. WQ0001908000.		7/2/2008
6.3 – 1	NFA	Hydrology	Describe waste effluent and storm water outfalls that will be added to existing outfalls and the water bodies into which they will discharge.	The response states that the storm water outfalls and the receiving water bodies will be same as those for Units 1 and 2. This is adequate but the response to 4.2-13 needs to be consistent with this response.	7/15/2008
6.3 – 2	RES	Hydrology	Provide information regarding the anticipated operational monitoring deriving from the NRC 10 CFR 20.1406 initiative and the Nuclear Energy Institute program.		7/15/2008

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South Texas Project  
RAI Response Tracking

RAI No.	Status	Subject	RAI	Comments	Response Date
7.1 – 1	RAI	Met/AQ Accidents	Provide the source of the dose factors used in evaluation of each design basis accident.	Initial response references whole body dose factors from a GE report. Request a listing of those dose factors. Need to check on the duration of the instrument line break accident dose calculation for the EAB.	7/15/2008
7.1 – 2	RES	Met/AQ Accidents	Provide correct EAB and LPZ dose estimates for the Clean Up Water Line Break Outside Containment DBA in Table 7.1–12.		7/15/2008
7.2 – 1	RES	Met/AQ Accidents	Provide MACCS2 input and output files for MACCS2 calculations that include calculations of early fatalities for an average individual within 1 mile of Units 3&4.		7/2/2008
7.2 – 2	RES	Met/AQ Accidents	Provide a description of each severe accident scenario and release category.		7/2/2008
7.2 – 3	RES	Met/AQ Accidents	Provide source terms, core damage frequencies and severe accident consequences by release category. Separate the consequences for the air and water pathways.		7/2/2008
7.2 – 4	NFA	Met/AQ Accidents	Provide a discussion of the risks associated with external initiating events.	Further pursuit of this is not going to be worth the effort. Can get information from DCD/FSAR.	7/2/2008
7.2 – 5	RES	Met/AQ Accidents	Describe how evacuation was modeled in MACCS2.		7/2/2008
7.2 – 6	RAI	Met/AQ Accidents	Provide a list of major surface water users within 50 mi of STP Units 3 & 4, especially public water supplies.	Initial RAI response unresponsive. Need information on surface water users to interpret/evaluate MACCS2 results.	7/2/2008
7.2 – 7	RAI	Met/AQ Accidents	Revise the discussion of the groundwater pathway risks for STP Units 3 & 4 to support the conclusion in the last sentence of ER Section 7.2.2.3.	Initial RAI response still lacks complete logic chain. Need a statement on the magnitude of releases to groundwater from ABWR compared to existing units.	7/2/2008
7.2 – 8	NFA	Met/AQ Accidents	Describe how the average individual risk listed in ER Section 7.2.3 was determined.	Initial RAI response indicates deviation from accepted methodology. However, MACCS2 output file includes the needed information.	7/2/2008

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South Texas Project  
RAI Response Tracking

RAI No.	Status	Subject	RAI	Comments	Response Date
7.2 – 9	RAI	Met/AQ Accidents	Discuss ABWR DCD COL action items and open items related to severe accidents and how the action and open items will be addressed.	STP FSAR, which addresses the COL action items listed in DCD Chapter 19.9, references an Appendix 19R to an unspecified document. There does not appear to be an Appendix 19R supplied with the application.	7/2/2008
7.3 – 1	NFA	Met/AQ Accidents	Discuss the process for ensuring that SAMAs related to operating procedure and administrative controls will be evaluated prior to plant startup.	Initial RAI response is ambiguous, "... could be by such means as..." Would like a more specific statement about procedures, but probably not worth pursuing.	7/2/2008
8.0 – 1	RES	Socio/EJ Need for Power	Clarify ownership of STP Units 3 & 4.		7/2/2008

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South Texas Project  
RAI Response Tracking

RAI No.	Status	Subject	RAI	Comments	Response Date
9.3 – 1	RAI	Land Use Alt Sites	Explain how the Limestone alternative site satisfies NRC's siting criteria for candidate sites.	<p>The staff requests further information regarding how the Limestone site is among the best candidate sites that can reasonably be found for the siting of a nuclear power plant (ESRP 9.3) given the water scarcity and mineral rights issues at the site. NRG is one of the planned co-owners of STP Units 3 and 4. In NRG's Limestone 3 Expansion Project fact sheet (<a href="http://www.nrgenergy.com/pdf/factsheet_limestone.pdf">http://www.nrgenergy.com/pdf/factsheet_limestone.pdf</a>), NRG states that "to conserve scarce water resources in the area, Limestone 3 will use dry cooling to condense the steam back into water." STPNOC's response states that "it assumed that sufficient water could be purchased and developed for cooling at the site." STPNOC's response also notes that "dry cooling is not necessarily an appropriate alternative cooling technology for ABWR units." The staff is having difficulty reconciling STPNOC's responses with the NRG statements in the Limestone 3 fact sheet. Specifically, if sufficient water could be purchased for the Limestone site (as stated in the response), the staff does not understand why NRG would propose dry cooling for Limestone 3 given the economic penalty of dry cooling in comparison to wet cooling. In addition, since dry cooling is proposed by NRG for Limestone 3, the staff does not understand how Limestone could be a candidate site for ABWR units for which dry cooling is an inappropriate cooling technology. In its response, STPNOC also states that it assumed that it could acquire the mineral and natural gas rights to the Limestone site. During the staff visit to the Limestone site in March 2008, staff was told by NRG personnel that the mineral rights issue was a serious concern at the site and that NRG had to initiate legal action to prevent drilling for natural gas under the ash pile at the site. The staff does not understand why, if the mineral rights at the Limestone site could be acquired as the response states, NRG has not already</p>	7/15/2008

South Texas Project  
RAI Response Tracking

RAI No.	Status	Subject	RAI	Comments	Response Date
9.3 – 2	RAI	Land Use Alt Sites	How would inclusion of information regarding the proposed coal-fired unit 3 at the Limestone site affect the discussion of the site in section 9.3.3.1 of the ER?	Attachment 61 of STPNOC's 7/15/08 RAI response states that the siting of Limestone 3 would not change the analysis in section 9.3.3.1 of the ER which currently does not address any impacts from Limestone 3. The response further states that Limestone 3 would take advantage of existing infrastructure and that new ABWR units at the Limestone site would not significantly affect the construction and operation at the site. The staff does not understand how siting of both new ABWR units and Limestone 3 at the Limestone site would not change the analysis in section 9.3.3.1 of the ER. If work on the ABWR units and Limestone 3 were being conducted concurrently it seems that at a minimum there would be enhanced socioeconomic impacts from the two construction projects that would be pertinent to the discussion in section 9.3.3.1 of the ER. In addition, STPNOC's statement at p. 1 of Attachment 60 to the 7/15/08 RAI response (In assessing the environmental impacts of ABWR units at the Limestone site, STPNOC assumed that the ABWR would be sited there instead of a third coal-fired plant) does not seem consistent with the STPNOC statements in Attachment 61 of the 7/15/08 RAI response (STPNOC anticipated that the ABWR units would be built in the Freestone County portion of the site. STPNOC assumes that the Limestone 3 plant would take advantage of the infrastructure within the coal-fired plant area in Limestone County). The staff requests clarification of the preceding statements. The staff also requests information on who owns the mineral rights at the Freestone County portion of the Limestone site.	7/15/2008
9.3 – 3	RES	Land Use Alt Sites	What are the dimensions of the existing transmission line ROWs serving the Limestone site?		7/15/2008

RES = resolved; NFA = no further action; RAI = additional information needed

South Texas Project  
RAI Response Tracking

RAI No.	Status	Subject	RAI	Comments	Response Date
9.3 – 4	RAI	Land Use Alt Sites	Explain how the Malakoff alternative site satisfies NRC's siting criteria for candidate sites.	The staff requests additional information on practical, specific water sources that could support wet cooling for new ABWR units located at the Malakoff site. The staff was not able to identify any such water sources during their visit to the Malakoff site in March 2008. The staff also requests specific references to where the Texas Water Development Board has stated that surface water is "plentiful" (see p. 1 of Attachment 63 of STPNOC's 7/15/08 RAI response) in the vicinity of the Malakoff site.	7/15/2008
9.3 – 5	RES	Land Use Alt Sites	Who are the current owners of the Allen's Creek and Malakoff alternative sites?		7/2/2008
9.3 – 6	RES	Socio/EJ Need for Power	Reconcile conflicting socioeconomic impact levels for the Limestone site.	Note: On socioeconomic grounds, now preferred to STP Site	7/2/2008
9.3 – 7	RES	Socio/EJ Need for Power	Reconcile conflicting socioeconomic impact levels for the Allens Creek site.	Note: On socioeconomic grounds, now preferred to STP Site	7/2/2008
9.3 – 8	RES	Socio/EJ Need for Power	Reconcile conflicting socioeconomic impact levels for the Malakoff site.	Note: On socioeconomic grounds, now preferred to STP Site	7/2/2008
9.3.2 – 1	RES	Terres Ecology	Provide the documentation that supports the statements and conclusions used in Section 9.3 on terrestrial resources at the Limestone site.		7/2/2008
9.3.2 – 2	RES	Terres Ecology	Provide the documentation that supports the statements and conclusions used in Section 9.3 on terrestrial resources at the Allens Creek site.		7/15/2008
9.3.2 – 3	RES	Terres Ecology	Provide the documentation that supports the statements and conclusions used in Section 9.3 on terrestrial resources at the Malakoff site.		7/15/2008

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South Texas Project  
RAI Response Tracking

RAI No.	Status	Subject	RAI	Comments	Response Date
9.3.2 – 4	NFA	Aquatic Ecology	Please describe potential impacts to threatened or endangered species and their habitats as a result of construction and operation at each of the three alternative sites.	We will use other references to specifically address impacts based on the list of species provided. Assumptions for impact evaluation is still not clear. See RAIs 9.3.3-1, 9.3.3-2, and 9.3.3-3.	7/2/2008
9.3.3 – 1	RAI	Aquatic Ecology	Describe the process used to quantify the impact statement for aquatic resources at the Limestone site and provide the documentation that supports the statements and conclusions used in Section 9.3.	Response does not address question and raises more questions.	7/2/2008
9.3.3 – 2	RAI	Aquatic Ecology	Describe the process used to quantify the impact statement for aquatic resources at the Allens Creek site and provide the documentation that supports the statements and conclusions used in Section 9.3.	Response does not address question and raises more questions.	7/2/2008
9.3.3 – 3	RAI	Aquatic Ecology	Describe the process used to quantify the impact statement for aquatic resources at the Malakoff site and provide the documentation that supports the statements and conclusions used in Section 9.3.	Response does not address question and raises more questions.	7/2/2008
9.4 – 1	RAI	Hydrology	If the MCR is part of the closed-loop cooling system, then describe alternatives considered for the proposed circulating water system including a description of all elements required by ESRP 9.4.2. Describe the process followed to determine that no obviously superior alternatives for the proposed circulating water system, water supply, and water treatment exist.	The response did not identify and discuss alternative water supplies to the proposed cooling system for STP Units 3 and 4 as recommended by ESRP 9.4.2.	7/15/2008

South Texas Project  
RAI Response Tracking

RAI No.	Status	Subject	RAI	Comments	Response Date
10.5S – 1	RES	Hydrology	Describe groundwater conservation and other mitigative measures as noted in Section 10.5S.1.2.		8/14/2008
10.5S – 2	RAI	Hydrology	Describe the analytical process used to determine cumulative impacts to downstream surface water users.	The response is not quite what we were looking for. They still are arguing about the fact that they will operate the new units under existing permits and therefore the cumulative impact will be SMALL. We can push them on this a bit, or, wait for the MCR water budget and water quality models to become available and use the results for 2-units and 4-units operations to assess the cumulative impact ourselves.	8/14/2008
10.5S – 3	RAI	LWA	Limited Work Authorization for Nuclear Power Plants	The 540 acre figure at p. 2 of Attachment 21 for land disturbed on long-term or short-term basis is not consistent with the 768 acre figure in Table 4.1-1 of the ER. That discrepancy will require some explanation from STPNOC. The NRC will need to determine the acceptability of the % breakdown in Table 4.6-2 of Attachment 21.	8/14/2008

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South Texas Project  
RAI Response Tracking

Status	RAI No.	Subject	RAI	Comments	Response Date
NFA	2.3 – 1	Hydrology	Provide USACE documentation regarding the status of the MCR as waters of the US.	The question whether the MCR is waters of the US is still open and being considered by the USACE. The staff may need to assume that the USACE determination will be affirmative (that the MCR is waters of the US) and carry out its independent impact assessment accordingly.	7/30/2008
NFA	2.3 – 4	Hydrology	Provide water use requirements downstream of the STP intake.	The response seems adequate although there is some confusion caused by quoting selected sentences from the Matagorda Bay Freshwater Inflow Needs Study. The staff needs to review this study.	7/2/2008
NFA	2.3 – 5	Hydrology	Provide the location and other pertinent data for the salinity wedge in the Colorado River during various discharges.	The response seems adequate. The staff needs to check the MCR water quality modeling inputs to see if the salinity data included as part of the RAI response are appropriately used.	7/2/2008
NFA	2.3 – 11	Hydrology	Address the inconsistency between the 1985 forecast of a decline in groundwater use in Matagorda County against currently available county data on groundwater use. Provide a projection of future groundwater use in Section 2.3.2.2, and provide a breakdown of water demand, described in Table 2.3.2-6, between that to be provided by surface water and groundwater resources.	Based on the RAI response, the NRC will state that STP plans to use its full groundwater permitted amount (3000 acre-ft/yr, 1860 gpm) with additional water requirements for specific purposes being provided from the MCR. Also, based on information from the CPGCD, the NRC will note that the permitted groundwater use level is shown as an annual average, but is actually a 5-yr commitment. Accordingly, higher than average annual usage in one year can be balanced against lower usage years within the 5-yr permit period. The NRC will check further to learn of the groundwater usage estimated for the STP in the North Gulf Coast Aquifer GAM. Reliance on the GAM results will, in part, rely on the use of the full groundwater allotment of 3000 acre-ft/yr in the model.	7/15/2008
NFA	2.3 – 12	Hydrology	Provide an analysis of the sustainable groundwater resource.	The NRC will contact the CPGCD and reflect in the EIS their view of the potential to satisfy peak demand for outages through an increased permitted groundwater allotment for short-term uses.	7/15/2008
NFA	4.2 – 9	Hydrology	Why is the lower value of subsidence estimates used?	Staff will mention the commitment of STP to monitor groundwater levels, and dewatering pumping rates, and to react appropriately with modifications to the dewatering plan (e.g., including the construction of cutoff walls) to limit potential impacts to nearby surface drainage and facilities.	7/15/2008

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South Texas Project  
RAI Response Tracking

Status	RAI No.	Subject	RAI	Comments	Response Date
NFA	4.2 – 12	Hydrology	Present an evaluation or validation of the model shown at the beginning of Section 4.2.2.1.	While the response is adequate, it would appear that review of a calculation package will be necessary to check the potential drawdown values included in the RAI response. Access to the calculation package will be requested under the follow-on to RAI 4.2-11.	7/15/2008
NFA	5.2 – 1	Hydrology	Discuss the incremental change in the availability of the water resource, and the incremental change in groundwater drawdown as an impact of station operation on potential water users.	With regard to surface water resources, the response seems adequate. The staff will need to review the MCR water budget model to ensure that this response is consistent with the MCR operation policy implemented in the model. The model results would provide the incremental year-to-year impact to water resources due to operation of STP Units 3 and 4 that may be more severe than the ~7.5% of the 2060 available water in the Colorado Basin stated in this RAI response. With regard to the groundwater resource, the response in RAI 2.3-12 is adequate and requires No Further Action by the applicant.	7/15/2008
NFA	6.3 – 1	Hydrology	Describe waste effluent and storm water outfalls that will be added to existing outfalls and the water bodies into which they will discharge.	The response states that the storm water outfalls and the receiving water bodies will be same as those for Units 1 and 2. This is adequate but the response to 4.2-13 needs to be consistent with this response.	7/15/2008
NFA	2.7 – 1	Met/AQ Accidents	Provide a climatological summary of the STP meteorological data.	Further pursuit of this is not going to be worth the effort.	7/15/2008
NFA	3.4.1 – 1	Met/AQ Accidents	Provide a citation for the estimated cooling tower noise level of about 57 dBA.	The RAI response is an attempt to side step the issue. Continued pursuit of information not likely to be of much value.	7/2/2008
NFA	7.2 – 4	Met/AQ Accidents	Provide a discussion of the risks associated with external initiating events.	Further pursuit of this is not going to be worth the effort. Can get information from DCD/FSAR.	7/2/2008
NFA	7.2 – 8	Met/AQ Accidents	Describe how the average individual risk listed in ER Section 7.2.3 was determined.	Initial RAI response indicates deviation from accepted methodology. However, MACCS2 output file includes the needed information.	7/2/2008
NFA	7.3 – 1	Met/AQ Accidents	Discuss the process for ensuring that SAMAs related to operating procedure and administrative controls will be evaluated prior to plant startup.	Initial RAI response is ambiguous, "... could be by such means as..." Would like a more specific statement about procedures, but probably not worth pursuing.	7/2/2008
NFA	5.4.1 – 2	Rad. Health	Why does the ABWR DCD table 12.2-22 not match the FSAR table 12.2-22	STP will include Ag-110-m and Sb-124 in the FSAR, but did not mention updating the Nd-147 in the ABWR DCD.	7/2/2008

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South Texas Project  
RAI Response Tracking

Status	RAI No.	Subject	RAI	Comments	Response Date
NFA	5.4.1 – 3	Rad. Health	What is the basis and where did the source term for LADTROB2.DAT come from?	STP said they started with 55 nuclides from DCD table 12.2-22 but removed 9 radionuclides that had ZERO release to MCR and another 9 that had ZERO fractions reaching Little Robins Slough. And supplemental LADTAP runs which included Np-239 showed the dose contribution as negligible. However, it would be nice to see the corrected results in the COLA revision.	7/2/2008
NFA	5.4.1 – 4	Rad. Health	Where did the source term for LADTROB2.DAT come from?	STP said they started with 55 nuclides from DCD table 12.2-22 but removed 9 radionuclides that had ZERO release to MCR and another 9 that had ZERO fractions reaching Little Robins Slough. And supplemental LADTAP runs which included Np-239 showed the dose contribution as negligible. HOWEVER, it would be nice to see the corrected results in the COLA revision.	7/2/2008
NFA	5.4.4 – 1	Rad. Health	What effect will raising the MCR level by 2 feet, have on the migration of radionuclides from MCR to Little Robbins Slough?	STP's response was that the ODCM calculation of radionuclide migration to Little Robbins Slough is conservative because MCR operates at 150,000 Ac-ft of water for 2 unit operation and will increase to about 202,700 Ac-ft when the level is raised 2 ft - this will effectively dilute the radionuclide concentrations in MCR. The dilution of radionuclides in MCR has greater effect than the 6% increase in pressure head will have on migration out of MCR. "In any case, the reservoir was designed for 4-unit operation and since the ODCM seepage analysis assumes design stage estimates, the liquid discharge flow to Little Robbins Slough used in the ER is valid."	7/2/2008
NFA	2.4.2 – 4	Aquatic Ecology	Describe the saltwater wedge at the RMPF (~NMM 8 on the Colorado River).	The response seems adequate. The staff needs to check the MCR water quality modeling inputs to see if the salinity data included as part of the RAI response are appropriately used.	7/2/2008
NFA	2.4.2 – 8	Aquatic Ecology	Discuss the different classifications of wetlands on the STP site and the acreages associated with each.	The response addresses and clarifies the ER sections. However, further information on wetlands needs to be provided through consultation with ACE.	7/2/2008
NFA	4.3.2 – 1	Aquatic Ecology	What are the requirements for dredging in the Colorado River under the existing permits with the U.S. Corps of Engineers?	Requested the correspondence, but was provided instead with summary of information presumably from the correspondence.	7/15/2008

RES = resolved; NFA = no further action; RAI = additional information needed

South Texas Project  
RAI Response Tracking

Status	RAI No.	Subject	RAI	Comments	Response Date
NFA	4.3.2 – 3	Aquatic Ecology	What are the impacts from construction activities on aquatic resources associated with surface water and drainage ditches?	The response is adequate. Need to re-evaluate when further information from ACE on the slough and ditches are available.	7/2/2008
NFA	5.3.2 – 2	Aquatic Ecology	How will water discharged at outfall 001 be evaluated and compliance with TCEQ permit # WQ0001908000 be determined?	Response is not consistent with information provided at site audit. Will address further when information from RAI 2.3-6 (the MCR water quality model results) is received.	7/15/2008
NFA	5.3.4 – 4	Aquatic Ecology	How does the state's designation of Segment 1401 of the Colorado River as "impaired" relate to the impact evaluation?	Links with 2.4.2 - 10. Not all accurate, but usable.	7/2/2008
NFA	9.3.2 – 4	Aquatic Ecology	Please describe potential impacts to threatened or endangered species and their habitats as a result of construction and operation at each of the three alternative sites.	We will use other references to specifically address impacts based on the list of species provided. Assumptions for impact evaluation is still not clear. See RAIs 9.3.3-1, 9.3.3-2, and 9.3.3-3.	7/2/2008
NFA	2.5 – 1	Socio/EJ Need for Power	Provide an electronic copy of the Socioeconomics "Validation Package".	Validation package doesn't do us a whole lot of good in Texas. Unable to review.	7/2/2008
NFA	2.5 – 2	Socio/EJ Need for Power	Update population and growth rates based on post-2000 Census data.	We were hoping that they would at least test the forecasts against post-2000 estimates. Clearly they are not going to do that, so we will.	7/15/2008
NFA	2.5 – 17	Socio/EJ Need for Power	Describe the future impact of the growth in electricity production on water demand in the Colorado River.	We may have to seek the information on projects from the State Water Board	7/30/2008
NFA	2.5 – 18	Socio/EJ Need for Power	Clarify contents and provide copies of references 2.5-14, 2.5-15, and 2.5-17.	Did not provide copy of Yoakum district map. We will have to get it ourselves.	7/15/2008
NFA	5.8 – 4	Socio/EJ Need for Power	Estimate housing impacts using latest population data.	We will check state and American Community survey ourselves.	7/15/2008
NFA	5.10 – 1	Socio/EJ Need for Power	Indicate which actions to limit adverse impacts during operation are commitments.	None are commitments, so they can't take credit for them as mitigation.	7/2/2008
NFA	5.3.1.2 – 4	Aquatic Ecology	What is the impact of operation of the RMPF on managed species included in the Fisheries Management Plans for the Gulf of Mexico?	While the response is difficult to understand, there is enough information at this time to proceed with EFH consultation with NMFS.	8/14/2008

RES = resolved; NFA = no further action; RAI = additional information needed

South Texas Project  
RAI Response Tracking

Status	RAI No.	Subject	RAI	Comments	Response Date
RAI	2.3 – 2	Hydrology	Describe the existing storm water treatment and outfalls, and the water bodies into which they discharge.	The response seems adequate. The staff needs a better copy of Figure 1-1 from STPNOC 2004 Storm Water Pollution Prevention Plan included in the response.	7/2/2008
RAI	2.3 – 3	Hydrology	Provide information regarding water rights under severe droughts.	From STPNOC's response, it is not clear who STPNOC will request the emergency relief from under the stipulations of Texas Water Code Section 11.148. The staff needs to clarify the response from STPNOC, or to independently find this information.	7/2/2008
RAI	2.3 – 7	Hydrology	Provide details of the process followed in the selection of the site hydrogeologic conceptual model.	The process description is good, but could be interpreted as leading to a single alternative conceptual model. The process described does not explicitly describe the alternate conceptual models considered, and the logic that produced the plausible conservative conceptual model on which analyses are based. A contradiction exists in item (a) Drawdown at offsite wells. It states that based on the conceptual model and drawdown during construction dewatering and water production there "may" be potential impacts to offsite wells. It also states that drawdown during dewatering will "remain within the STP site boundaries." Consequently, based on these statements, it is not clear what impacts from dewatering are expected. Also, since drawdown values are presented, it will be necessary to review calculation packages.	7/2/2008
RAI	2.3 – 8	Hydrology	Provide groundwater observations for a sufficiently long period to reveal seasonal trends. If available, also provide long-term trend data on groundwater in the vicinity of the proposed facility.	The RAI response and proposed revision includes the revised table providing the groundwater observations revealing seasonal trends; however, the series of figures (Figure 2.3.1-25) showing quarterly aquifer response to stress should also be revised to show the full year seasonal response in the data set. The current figure shows February and April results only.	7/2/2008

South Texas Project  
RAI Response Tracking

Status	RAI No.	Subject	RAI	Comments	Response Date
RAI	2.6 – 1	Hydrology	Provide a summary of past and expected surface settlements and how future settlements may impact surface water drainages, a description of various dewatering options, and relative settlements expected for each dewatering option.	The response draws heavily on the assumed similarity of construction dewatering for existing STP Units 1&2 and proposed STP Units 3&4. A summary comparison of the two events is needed to support this assumption. Information to be included would be the area dewatered, depth of dewatering, duration of dewatering, and measured and expected dewatering production rate.	7/2/2008
RAI	4.2 – 5	Hydrology	Provide information regarding the locations of drainage ditches and retention ponds.	The RAI response states that the final location of the main drainage ditch, which is to be relocated north of the STP Units 3 and 4, is still undetermined. The staff were provided a map by Russ Kiesling of STPNOC where the location of the MDC was sketched. The staff needs to clarify if the RAI response is consistent with that map.	7/15/2008
RAI	4.2 – 6	Hydrology	Describe the analytical process used to determine impacts to surface water hydrology would be SMALL.	The RAI response details what would be done during construction of STP Units 3 and 4. There is still no description of the process or the bases used to determine that the impacts on surface water from these activities are SMALL. The argument presented still is that the impacts will be SMALL since the activities are allowed under a state or a federal permit. The staff does not have enough information to carry out its own independent assessment of the level of the impact from construction as required by 10 CFR 51.71(d).	7/2/2008
RAI	4.2 – 7	Hydrology	Provide a list and description of pre-construction activities mentioned in ER Section 1.1.2.7.	Power Block Earthwork is mentioned as a pre-construction activity. Structural fill will be placed in some of the excavations. Also, it seems that the fabrication of the reactor building base mat reinforcing module would occur prior to the COL being granted. The staff needs clarification if these activities could be called "pre-construction" under the new LWA rule.	7/15/2008

South Texas Project  
RAI Response Tracking

Status	RAI No.	Subject	RAI	Comments	Response Date
RAI	4.2 – 8	Hydrology	Provide a map or drawing showing the extent of the excavations, and how close they will come to STP 1 & 2, the MCR, and wetlands. Describe the dewatering and excavation process.	The ER describes two excavations 900'x950' for the units, and one 650'x550' for the ultimate heat sink. The RAI response states that dewatering has been analyzed assuming a 1200'x650' excavation. The RAI response also states that the requested map of excavations can not be provided. The information in the ER and RAI response appears to be contradictory. It is not possible to fit two 900'x950' excavations into a 1200'x650' hypothetical excavation. The staff need a basis for performing a bounding calculation of dewatering impact, and this RAI response does not provide it. Without a site map showing the relative position of excavations it is not possible to put forward a single excavation that would bound all excavations.	7/15/2008
RAI	4.2 – 10	Hydrology	Demonstrate the lack of connectivity between dewatering wells and the wetlands and shallow surface water features.	Staff will mention the willingness of STP to monitor groundwater and surface features in the vicinity of the dewatering activity, and, if significant impacts are observed, STP's willingness to implement remedies including supplementing flow to the wetlands and installing cutoff walls. However, STP's statement that "... dewatering activities could be monitored during dewatering activities to determine if dewatering activities are impacting surface water features ..." needs to be clarified. Staff need to be able to refer to monitoring and possible remedies as a commitment by STP. Thus, an RAI is needed.	7/15/2008
RAI	4.2 – 11	Hydrology	Provide a full description of the potential impacts to nearby groundwater users.	While the response is adequate, it would appear that review of a calculation package will be necessary to check the potential drawdown values included in the RAI response.	7/15/2008

South Texas Project  
RAI Response Tracking

Status	RAI No.	Subject	RAI	Comments	Response Date
RAI	9.4 – 1	Hydrology	If the MCR is part of the closed-loop cooling system, then describe alternatives considered for the proposed circulating water system including a description of all elements required by ESRP 9.4.2. Describe the process followed to determine that no obviously superior alternatives for the proposed circulating water system, water supply, and water treatment exist.	The response did not identify and discuss alternative water supplies to the proposed cooling system for STP Units 3 and 4 as recommended by ESRP 9.4.2.	7/15/2008
RAI	2.7 – 2	Met/AQ Accidents	Discuss the likelihood that the combination of the MCR and the STP Unit 3 & 4 cooling towers will have a synergistic effect that increases the frequency or intensity of fog.	Response does not address changes in location of cooling towers. Will have to be revisited to include consideration of the revised cooling tower location.	7/15/2008
RAI	2.7 – 3	Met/AQ Accidents	Describe which PAVAN files were used and how the 50% $\chi/Q$ values were derived.	Response needs further amplification. Not clear that the approach can be used to give the 50% X/Q values.	7/15/2008
RAI	2.7 – 5	Met/AQ Accidents	Interpret the word "may" as it relates to actions to mitigate potential impacts of construction on air quality.	In general, initial RAI response ok. However, the response raises the issue of a "Construction Environmental Control Plan." Need more information about that plan. When? Who? External review and approval?	7/2/2008
RAI	5.3.3.1 – 1	Met/AQ Accidents	Justify the assumption in the 2nd paragraph of ER Section 5.3.3.1.2 that there will not be increased fogging.	Response relies on monthly average values of temperature increase in pond to support assumption. The monthly average values indicate a 37% increase in saturation vapor pressure of the MCR during the winter and a bout a 7% increase in radiative heat loss. The justification for there assumption that there will be no impact on fogging is not convincing.	7/30/2008
RAI	7.1 – 1	Met/AQ Accidents	Provide the source of the dose factors used in evaluation of each design basis accident.	Initial response references whole body dose factors from a GE report. Request a listing of those dose factors. Need to check on the duration of the instrument line break accident dose calculation for the EAB.	7/15/2008
RAI	7.2 – 6	Met/AQ Accidents	Provide a list of major surface water users within 50 mi of STP Units 3 & 4, especially public water supplies.	Initial RAI response unresponsive. Need information on surface water users to interpret/evaluate MACCS2 results.	7/2/2008

South Texas Project  
RAI Response Tracking

Status	RAI No.	Subject	RAI	Comments	Response Date
RAI	7.2 – 7	Met/AQ Accidents	Revise the discussion of the groundwater pathway risks for STP Units 3 & 4 to support the conclusion in the last sentence of ER Section 7.2.2.3.	Initial RAI response still lacks complete logic chain. Need a statement on the magnitude of releases to groundwater from ABWR compared to existing units.	7/2/2008
RAI	7.2 – 9	Met/AQ Accidents	Discuss ABWR DCD COL action items and open items related to severe accidents and how the action and open items will be addressed.	STP FSAR, which addresses the COL action items listed in DCD Chapter 19.9, references an Appendix 19R to an unspecified document. There does not appear to be an Appendix 19R supplied with the application.	7/2/2008

South Texas Project  
RAI Response Tracking

Status	RAI No.	Subject	RAI	Comments	Response Date
RAI	9.3 – 1	Land Use Alt Sites	Explain how the Limestone alternative site satisfies NRC's siting criteria for candidate sites.	<p>The staff requests further information regarding how the Limestone site is among the best candidate sites that can reasonably be found for the siting of a nuclear power plant (ESRP 9.3) given the water scarcity and mineral rights issues at the site. NRG is one of the planned co-owners of STP Units 3 and 4. In NRG's Limestone 3 Expansion Project fact sheet (<a href="http://www.nrgenergy.com/pdf/factsheet_limestone.pdf">http://www.nrgenergy.com/pdf/factsheet_limestone.pdf</a>), NRG states that "to conserve scarce water resources in the area, Limestone 3 will use dry cooling to condense the steam back into water." STPNOC's response states that "it assumed that sufficient water could be purchased and developed for cooling at the site." STPNOC's response also notes that "dry cooling is not necessarily an appropriate alternative cooling technology for ABWR units." The staff is having difficulty reconciling STPNOC's responses with the NRG statements in the Limestone 3 fact sheet. Specifically, if sufficient water could be purchased for the Limestone site (as stated in the response), the staff does not understand why NRG would propose dry cooling for Limestone 3 given the economic penalty of dry cooling in comparison to wet cooling. In addition, since dry cooling is proposed by NRG for Limestone 3, the staff does not understand how Limestone could be a candidate site for ABWR units for which dry cooling is an inappropriate cooling technology. In its response, STPNOC also states that it assumed that it could acquire the mineral and natural gas rights to the Limestone site. During the staff visit to the Limestone site in March 2008, staff was told by NRG personnel that the mineral rights issue was a serious concern at the site and that NRG had to initiate legal action to prevent drilling for natural gas under the ash pile at the site. The staff does not understand why, if the mineral rights at the Limestone site could be acquired as the response states, NRG has not already</p>	7/15/2008

South Texas Project  
RAI Response Tracking

Status	RAI No.	Subject	RAI	Comments	Response Date
RAI	9.3 – 2	Land Use Alt Sites	How would inclusion of information regarding the proposed coal-fired unit 3 at the Limestone site affect the discussion of the site in section 9.3.3.1 of the ER?	Attachment 61 of STPNOC's 7/15/08 RAI response states that the siting of Limestone 3 would not change the analysis in section 9.3.3.1 of the ER which currently does not address any impacts from Limestone 3. The response further states that Limestone 3 would take advantage of existing infrastructure and that new ABWR units at the Limestone site would not significantly affect the construction and operation at the site. The staff does not understand how siting of both new ABWR units and Limestone 3 at the Limestone site would not change the analysis in section 9.3.3.1 of the ER. If work on the ABWR units and Limestone 3 were being conducted concurrently it seems that at a minimum there would be enhanced socioeconomic impacts from the two construction projects that would be pertinent to the discussion in section 9.3.3.1 of the ER. In addition, STPNOC's statement at p. 1 of Attachment 60 to the 7/15/08 RAI response (In assessing the environmental impacts of ABWR units at the Limestone site, STPNOC assumed that the ABWR would be sited there instead of a third coal-fired plant) does not seem consistent with the STPNOC statements in Attachment 61 of the 7/15/08 RAI response (STPNOC anticipated that the ABWR units would be built in the Freestone County portion of the site. STPNOC assumes that the Limestone 3 plant would take advantage of the infrastructure within the coal-fired plant area in Limestone County). The staff requests clarification of the preceding statements. The staff also requests information on who owns the mineral rights at the Freestone County portion of the Limestone site.	7/15/2008

South Texas Project  
RAI Response Tracking

Status	RAI No.	Subject	RAI	Comments	Response Date
RAI	9.3 – 4	Land Use Alt Sites	Explain how the Malakoff alternative site satisfies NRC's siting criteria for candidate sites.	The staff requests additional information on practical, specific water sources that could support wet cooling for new ABWR units located at the Malakoff site. The staff was not able to identify any such water sources during their visit to the Malakoff site in March 2008. The staff also requests specific references to where the Texas Water Development Board has stated that surface water is "plentiful" (see p. 1 of Attachment 63 of STPNOC's 7/15/08 RAI response) in the vicinity of the Malakoff site.	7/15/2008
RAI	2.4.1 – 5	Terres Ecology	Provide graphics that illustrate the salt deposition isopleths overlaid on existing habitat maps and wetland maps.	They did respond to the question, but it appears that the question is moot given potential design changes. A new figure will be developed once site layout/design changes are complete. Also, the figure only identifies wetlands, does not show the existing terrestrial habitats that would be impacted by a the salt plume deposition--so is deficient.	7/30/2008
RAI	2.4.2 – 2	Aquatic Ecology	Describe the aquatic habitat features at the RMPF.	Most of the questions in the supporting information are adequate. However, at the STP site audit, ENSR described why some gear types for sampling could not be used at the RMPF. The RAI does not reflect the information described at the site audit and the ENSR 2008 report does not address this question either. Request further information on sampling activities specifically applied at the RMPF.	7/15/2008
RAI	2.4.2 – 5	Aquatic Ecology	Discuss the uncertainties in evaluating the aquatic resources from past to current studies.	The response seems adequate. The staff needs to check the calculations based on Jaccard coefficients to support conclusions. Request raw data on monthly sampling to verify calculations.	7/2/2008
RAI	4.3.2 – 4	Aquatic Ecology	Provide information and figures describing the proposed locations of various construction project areas and activities and describe associated impacts to aquatic resources.	The RAI was answered. However, the RAI refers to a figure that was not supplied in the response. Figure 3.9S-1, which applicant states "will be changed accordingly" due to changes in the locations of various construction activities that have occurred since ER Rev. 1, needs to be provided.	7/2/2008
RAI	4.6 – 1	Aquatic Ecology	Describe the planned control program to mitigate construction-related impacts to aquatic ecosystems from suspended sediments.	The response does not address the question. Section 4.6-1 is a table of "planned control programs". Response does not address question. When response to RAI 4.2-13 is received, the staff will re-evaluate the need for further RAIs.	7/2/2008

South Texas Project  
RAI Response Tracking

Status	RAI No.	Subject	RAI	Comments	Response Date
RAI	5.3.1.2 – 1	Aquatic Ecology	Describe the design feature of the RMPF that allows an “escape route” for fish to swim back to the river and precluding entrapment.	While response is complete, more questions arise from the response. Response states that fish return system is blocked at high river flows to prevent plugging from debris. ER states that pumping at RMPF occurs only at high flows. Thus, the fish return system must not be operational when pumping at RMPF, and impact to aquatic organisms must be greater than stated in ER. Follow on RAI needed to confirm new information and impact assessment assumptions.	7/15/2008
RAI	5.3.1.2 – 2	Aquatic Ecology	Describe the process for calculating the maximum design approach velocity at the traveling screens on the RMPF for four units and provide the results of the calculations.	Response did not provide data requested to validate important design parameters. Follow on RAIs will ask more specifically for information used in ER and other references.	7/15/2008
RAI	5.3.2 – 3	Aquatic Ecology	What is the impact of outfall 001 and discharge from the MCR on managed species included in the Fisheries Management Plans for the Gulf of Mexico?	Response did not consider fish passage during discharge. Information on the configuration of the river bottom was not considered.	7/2/2008
RAI	9.3.3 – 1	Aquatic Ecology	Describe the process used to quantify the impact statement for aquatic resources at the Limestone site and provide the documentation that supports the statements and conclusions used in Section 9.3.	Response does not address question and raises more questions.	7/2/2008
RAI	9.3.3 – 2	Aquatic Ecology	Describe the process used to quantify the impact statement for aquatic resources at the Allens Creek site and provide the documentation that supports the statements and conclusions used in Section 9.3.	Response does not address question and raises more questions.	7/2/2008

South Texas Project  
RAI Response Tracking

Status	RAI No.	Subject	RAI	Comments	Response Date
RAI	9.3.3 – 3	Aquatic Ecology	Describe the process used to quantify the impact statement for aquatic resources at the Malakoff site and provide the documentation that supports the statements and conclusions used in Section 9.3.	Response does not address question and raises more questions.	7/2/2008
RAI	4.4 – 10	Socio/EJ Need for Power	Discuss the impact of construction on housing demand.	In our interviews with local officials, there was considerable informal knowledge concerning the locations of trailer courts during STP 1 & 2 construction, though none of this information was quantitative. If the information is not actually available, so be it.	7/15/2008
RAI	4.4 – 12	Socio/EJ Need for Power	Describe impacts of overlapping construction and operations workforces.	They didn't quite answer whether the net total effect of operations workforce would be greater or less than the construction workforce.	7/30/2008
RAI	2.4.1 – 3	Terres Ecology	Provide information and maps depicting all wetlands identified on the STP site during field surveys in 2006, 2007 and 2008.	Response did not provide any new data or information. see below "The results of these surveys were submitted in a preliminary report to USACE on April 9, 2008. The classifications of these wetlands and water bodies (primarily ditches) are pending confirmation of the STPNOC determination by USACE. Requested data from these sites will be submitted after receipt of the USACE response."	8/14/2008
RAI	2.4.1 – 4	Terres Ecology	Provide updated information describing and mapping water features and related wetland features on the STP site.	Response did not provide any new data or information. see below "The results of these surveys were submitted in a preliminary report to USACE on April 9, 2008. The classifications of these wetlands and water bodies (primarily ditches) are pending confirmation of the STPNOC determination by USACE. Requested data from these sites will be submitted after receipt of the USACE response."	8/14/2008

South Texas Project  
RAI Response Tracking

Status	RAI No.	Subject	RAI	Comments	Response Date
RAI	4.3.1 – 2	Terres Ecology	Provide information and figures describing the proposed locations of various construction project areas and activities and describe associated impacts to terrestrial resources.	The RAI was answered; however, the RAI refers to a figure that was not supplied in the response. Figure 3.9S-1, which applicant states "will be changed accordingly" due to changes in the locations of various construction activities that have occurred since ER Rev. 1, needs to be provided.	8/14/2008
RAI	5.3.1.2 – 3	Aquatic Ecology	What is the magnitude of impingement and entrainment of aquatic species at the RMPF for the species of fish currently found in the Colorado River compared to species present prior to 1993 when the diversion channel directed the river into East Matagorda Bay?	The response does not address the question. ENSR 2008 study was not designed to estimate impingement and entrainment. The response does not try to make a case based on EPA Clean Water Act 316(b) analyses. The response is also confusing because the 9th paragraph (on page 3 of 4, Attachment 14) implies that the information is on the Main Cooling Pond, but the reference (ENSR 2008) is the Colorado River report.	8/14/2008
RAI	2.5 – 4	Socio/EJ Need for Power	Provide a discussion of important community social structures and organizations.	The applicant has taken the position that NUREG 1555 does not require any analysis of faith based or NGO social service providers. Their response was instead a short primer on the different ways governments are organized and then an interpretation of the NUREG's call for a discussion of social services (it was a mistake, apparently). However, the discussion does not absolve the applicant from its responsibility to provide sufficient information on the social structure of the affected area, the expected changes that might occur during construction and operations, to ensure that they have gotten it right in their ER.	8/14/2008
RAI	2.5 – 6	Socio/EJ Need for Power	Provide a discussion of non-zoning controls on land development	The response seems to be sufficient, except that there are no citations to support the discussion. The applicant needs to provide such documentation as to how they reached their conclusions.	8/14/2008

South Texas Project  
RAI Response Tracking

Status	RAI No.	Subject	RAI	Comments	Response Date
RAI	2.5 – 11	Socio/EJ Need for Power	Confirm whether the 2000 Census is the most recent data available for housing availability in the counties near STP.	If the applicant is going to assert there are no differences except scale between the 2000 Census and more recent data, they will have to support that assertion by doing an analysis of the differences. In other words, they will have to prove their hypothesis by comparing 2000 Census data and more recent information (2005 Census updates, Texas statistics, etc., along with recent housing information available from sources other than Census). If this analysis does not support their hypothesis, then the applicant will have to revise their analysis based upon more recent data.	8/14/2008
RAI	2.5 – 12	Socio/EJ Need for Power	Discuss non-governmental service organizations located in Matagorda County and adjacent counties.	The applicant's response is another assertion that NGOs are not appropriate. Staff disagrees and requests the applicant provide the data requested. Their assertion that NGOs "are not directly impacted by project-induced changes to employment and, hence, changes in population" is incorrect and does not absolve the applicant from their responsibility to provide sufficient information to accept their analysis.	8/14/2008
RAI	2.3 – 6	Hydrology	Provide details of MCR operation during existing two-unit and future four-unit operation to help staff independently estimate water-use and water-quality impacts.	The modeling effort is underway, but will not be finished before the end of 2008. There is the possibility that the modeling effort may not answer some of the questions we have regarding assessment of impacts on the MCR and on the Colorado River after they submit, and we review, the completed response to RAI 2.3-6 by end of the year (realistically January 2009). It would be helpful to get an idea how they are developing the MCR models and how they plan to use them to assess the impacts. I do not want to be telling them in January that their models need substantial tweaking.	8/14/2008
RAI	10.5S – 2	Hydrology	Describe the analytical process used to determine cumulative impacts to downstream surface water users.	The response is not quite what we were looking for. They still are arguing about the fact that they will operate the new units under existing permits and therefore the cumulative impact will be SMALL. We can push them on this a bit, or, wait for the MCR water budget and water quality models to become available and use the results for 2-units and 4-units operations to assess the cumulative impact ourselves.	8/14/2008

South Texas Project  
RAI Response Tracking

Status	RAI No.	Subject	RAI	Comments	Response Date
RAI	10.5S – 3	LWA	Limited Work Authorization for Nuclear Power Plants	The 540 acre figure at p. 2 of Attachment 21 for land disturbed on long-term or short-term basis is not consistent with the 768 acre figure in Table 4.1-1 of the ER. That discrepancy will require some explanation from STPNOC. The NRC will need to determine the acceptability of the % breakdown in Table 4.6-2 of Attachment 21.	8/14/2008
RES	2.2 – 1	Hydrology	Provide a more complete description of mineral and petroleum resources in Matagorda County adjacent to the proposed facilities. The presence of petroleum wells in the vicinity of the site makes it necessary to explain why there are no mineral or petroleum “resources adjacent to or within the site boundary presently being exploited or of known commercial value.” Provide a more complete statement on the control of mineral rights, and, hence, the control of future drilling at the STP site.		7/2/2008
RES	2.3 – 9	Hydrology	Provide construction details, purpose, and function of relief wells surrounding the MCR.		7/30/2008
RES	2.3 – 10	Hydrology	Address inconsistency in ER text with respect to hydraulic conductivities presented in Figure 2.3.1–32.		7/2/2008
RES	2.3 – 13	Hydrology	Provide a clarification on the role of production wells related to groundwater pathway and impact on the deep aquifer.		7/2/2008
RES	2.3 – 14	Hydrology	Provide a description of the STP groundwater monitoring program.		7/2/2008
RES	2.3 – 15	Hydrology	Provide definitive information regarding known or assumed tritium sources.		7/15/2008
RES	4.2 – 1	Hydrology	Describe water resources that may be impacted along the transmission line.		7/15/2008
RES	4.2 – 2	Hydrology	Describe construction-related water quality impacts to hydrologic features.		7/15/2008

RES = resolved; NFA = no further action; RAI = additional information needed

South Texas Project  
RAI Response Tracking

Status	RAI No.	Subject	RAI	Comments	Response Date
RES	4.2 – 3	Hydrology	Provide information regarding the Erosion and Sediment Control Plan and Storm Water Management Plan.		7/15/2008
RES	4.2 – 4	Hydrology	Describe the impacts of new pump installation activities.		7/15/2008
RES	5.2 – 2	Hydrology	Address inconsistencies in the ER regarding groundwater impact levels.		7/15/2008
RES	5.2 – 3	Hydrology	Describe quantitatively the known impacts and qualitatively the potential future impacts on the groundwater system.		7/15/2008
RES	6.3 – 2	Hydrology	Provide information regarding the anticipated operational monitoring deriving from the NRC 10 CFR 20.1406 initiative and the Nuclear Energy Institute program.		7/15/2008
RES	2.7 – 4	Met/AQ Accidents	Explain why the XOQDOQ results presented in the FSAR differ from the results presented in the ER.		7/15/2008
RES	5.3.3.1 – 2	Met/AQ Accidents	Provide consistent values for cooling tower drift deposition at the Unit 3&4 switchyard.		7/2/2008
RES	7.1 – 2	Met/AQ Accidents	Provide correct EAB and LPZ dose estimates for the Clean Up Water Line Break Outside Containment DBA in Table 7.1–12.		7/15/2008
RES	7.2 – 1	Met/AQ Accidents	Provide MACCS2 input and output files for MACCS2 calculations that include calculations of early fatalities for an average individual within 1 mile of Units 3&4.		7/2/2008
RES	7.2 – 2	Met/AQ Accidents	Provide a description of each severe accident scenario and release category.		7/2/2008
RES	7.2 – 3	Met/AQ Accidents	Provide source terms, core damage frequencies and severe accident consequences by release category. Separate the consequences for the air and water pathways.		7/2/2008

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South Texas Project  
RAI Response Tracking

Status	RAI No.	Subject	RAI	Comments	Response Date
RES	7.2 – 5	Met/AQ Accidents	Describe how evacuation was modeled in MACCS2.		7/2/2008
RES	9.3 – 3	Land Use Alt Sites	What are the dimensions of the existing transmission line ROWs serving the Limestone site?		7/15/2008
RES	9.3 – 5	Land Use Alt Sites	Who are the current owners of the Allen's Creek and Malakoff alternative sites?		7/2/2008
RES	3.5 – 1	Rad. Health	Provide explanations and calculations, as appropriate, of the inputs to the LADTAP, GASPAR, and construction worker dose calculation. One acceptable way to respond to this RAI would be to provide the calculation packages.		7/2/2008
RES	4.5 – 1	Rad. Health	Discuss rationale for comparing construction worker doses to 40 CFR 190 criteria.		7/2/2008
RES	4.5 – 2	Rad. Health	Discuss rationale for comparing construction worker doses to 10 CFR 50 Appendix I criteria.		7/2/2008
RES	5.4.1 – 1	Rad. Health	What source term was used for the LADTAP input file "LADTROB2.DAT"?	STP states, "The header line preceding the source terms ... was not revised from initial analyses and incorrectly notes that the source terms are based on DCD Table 12.2-22." They will also update ER section 5.4.1 with correct reference and the FSAR will be updated to include the additional radionuclides (Ag-110-m and Sb-124).	7/2/2008
RES	4.1.3 – 1	Cult Res	Provide the plant procedure for inadvertent discovery of archaeological remains.		6/4/2008
RES	4.3.1 – 1	Terres Ecology	Identify and discuss habitats and important species associated with the 20-mile upgrade section of the Hillje transmission corridor.		7/15/2008
RES	9.3.2 – 1	Terres Ecology	Provide the documentation that supports the statements and conclusions used in Section 9.3 on terrestrial resources at the Limestone site.		7/2/2008

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South Texas Project  
RAI Response Tracking

Status	RAI No.	Subject	RAI	Comments	Response Date
RES	9.3.2 – 2	Terres Ecology	Provide the documentation that supports the statements and conclusions used in Section 9.3 on terrestrial resources at the Allens Creek site.		7/15/2008
RES	9.3.2 – 3	Terres Ecology	Provide the documentation that supports the statements and conclusions used in Section 9.3 on terrestrial resources at the Malakoff site.		7/15/2008
RES	2.4.2 – 6	Aquatic Ecology	In Table 2.4–2, what land area does the column, “STP Site”, include?		7/2/2008
RES	2.4.2 – 7	Aquatic Ecology	Provide correspondence with U.S. Fish and Wildlife Service, National Oceanic and Atmospheric Administration, and U.S. Army Corps of Engineers that has occurred since September 20, 2007.		7/2/2008
RES	2.4.2 – 9	Aquatic Ecology	What requirements are there for Segment 1401 of the Colorado River associated with listing of the region as “impaired waters due to the presence of bacteria”?		7/2/2008
RES	2.4.2 – 10	Aquatic Ecology	Provide information on the application for the Coastal Consistency Determination for Units 3 & 4.		7/2/2008
RES	4.3.2 – 2	Aquatic Ecology	Provide specific examples of activities that will reduce impacts to aquatic resources associated with the Erosion and Sediment Control Plan and Storm Water Management Plan.		7/2/2008
RES	5.3.4 – 2	Aquatic Ecology	Identify the recreational uses within Segment 1401 of the Colorado River and discuss the potential for exposure to thermophilic microorganisms via the thermal plume associated with outfall 001.		7/15/2008

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South Texas Project  
RAI Response Tracking

Status	RAI No.	Subject	RAI	Comments	Response Date
RES	5.3.4 – 3	Aquatic Ecology	Provide documentation of any correspondence with the Texas Department of State Health Services in support of the evaluation of thermophilic microorganisms in the vicinity of the discharge from the MCR into the Colorado River.		7/2/2008
RES	5.10 – 2	Aquatic Ecology	Explain the difference regarding the potential impact significance for water quality impacts found in Table 5.10-1 and the determination stated in the text of Section 5.2.3.		7/2/2008
RES	5.10 – 3	Aquatic Ecology	Explain the difference in the planned control program information for the discharge system and the description of temperature limits for TPDES Permit No. WQ0001908000.		7/2/2008
RES	2.5 – 3	Socio/EJ Need for Power	Provide an estimate of transient population employment in the fishing industry.		7/2/2008
RES	2.5 – 5	Socio/EJ Need for Power	Identify public and private recreational facilities and opportunities, including present and projected capacity and percentage of use.		7/30/2008
RES	2.5 – 7	Socio/EJ Need for Power	Provide a discussion of changes to anticipated levels of traffic identified by state transportation planners for Matagorda and surrounding counties.		7/15/2008
RES	2.5 – 8	Socio/EJ Need for Power	Provide a discussion of distinctive (e.g., minority, ethnic, religious) communities that exist in the area of the STP plant.		7/2/2008
RES	2.5 – 9	Socio/EJ Need for Power	Discuss contacts made with minority and low-income populations and state whether they identified any environmental concerns about STP Units 3 & 4.		7/2/2008

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South Texas Project  
RAI Response Tracking

Status	RAI No.	Subject	RAI	Comments	Response Date
RES	2.5 – 10	Socio/EJ Need for Power	What is the projected use of outdoor recreational facilities near STP?		7/2/2008
RES	2.5 – 13	Socio/EJ Need for Power	Discuss the participation in federal school free and low-cost lunch programs.		7/30/2008
RES	2.5 – 14	Socio/EJ Need for Power	Discuss the importance of local "roll-back" elections for ISD finances operating revenue.		7/30/2008
RES	2.5 – 15	Socio/EJ Need for Power	Discuss the outcome of the Moak, Casey, and Associates study and provide a copy.		7/15/2008
RES	2.5 – 16	Socio/EJ Need for Power	Describe the tax impact of the expanding San Antonio share of the STP 1 & 2, and impact of STP 3 & 4.		7/30/2008
RES	2.5 – 19	Socio/EJ Need for Power	Confirm source for Table 2.5-9.		7/30/2008
RES	2.5 – 20	Socio/EJ Need for Power	Provide data on all property tax collections, including a separation of STP payments.		7/30/2008
RES	2.5 – 21	Socio/EJ Need for Power	Estimate the degree of congestion for key road links approaching STP.		7/15/2008
RES	2.5 – 22	Socio/EJ Need for Power	Describe planned road upgrades on the commuting routes to STP.		7/15/2008
RES	2.5 – 23	Socio/EJ Need for Power	Discuss the environmental and socioeconomic impacts of upgrading the rail spur.		7/15/2008
RES	2.5 – 24	Socio/EJ Need for Power	Discuss seasonal low water issues with using the STP barge slip.		7/15/2008
RES	2.5 – 25	Socio/EJ Need for Power	Provide an explanation as to why maximum water treated exceeds rated capacity in Table 2.5-30.		7/30/2008

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South Texas Project  
RAI Response Tracking

Status	RAI No.	Subject	RAI	Comments	Response Date
RES	2.5 – 26	Socio/EJ Need for Power	Determine whether the population forecasts in the TX Water Plan are consistent with those in the demographic section.		7/30/2008
RES	2.5 – 27	Socio/EJ Need for Power	List private schools within 50 miles of STP, including specific details of each.		7/2/2008
RES	2.5 – 28	Socio/EJ Need for Power	Reconcile employment numbers for major employers.		7/30/2008
RES	2.5 – 29	Socio/EJ Need for Power	Provide revenue and expenditure data for the City of Palacios.		7/15/2008
RES	4.4 – 1	Socio/EJ Need for Power	Add a month by month table of projected “workers on site”.		7/30/2008
RES	4.4 – 2	Socio/EJ Need for Power	Reconcile construction-period employment assumptions.		7/30/2008
RES	4.4 – 4	Socio/EJ Need for Power	Revise estimated impacts of post–construction job and income losses.		7/30/2008
RES	4.4 – 5	Socio/EJ Need for Power	Further explain the land conversion assumption presented in Section 4.4.2 of the ER.		7/30/2008
RES	4.4 – 6	Socio/EJ Need for Power	Re–calculate traffic impacts based on more realistic assumptions.		7/15/2008
RES	4.4 – 7	Socio/EJ Need for Power	Calculate traffic impacts in congestion terms, not just impacts on pavements.		7/15/2008
RES	4.4 – 8	Socio/EJ Need for Power	Calculate traffic interactions between STP and hurricane evacuations.		7/15/2008

RES = resolved; NFA = no further action; RAI = additional information needed

South Texas Project  
RAI Response Tracking

Status	RAI No.	Subject	RAI	Comments	Response Date
RES	4.4 – 9	Socio/EJ Need for Power	Discuss the impacts of any interactions between the re-built rail spur and road traffic, especially on FM 521.		7/15/2008
RES	4.4 – 11	Socio/EJ Need for Power	Discuss impact of STP 3 & 4-related population growth on social services demands.		7/15/2008
RES	4.4 – 13	Socio/EJ Need for Power	Estimate expenditures within the region for materials and services during construction.		7/15/2008
RES	4.4 – 15	Socio/EJ Need for Power	List commitments to reduce physical impacts of construction.		7/15/2008
RES	4.4 – 16	Socio/EJ Need for Power	List commitments to reduce traffic impacts of construction.		7/15/2008
RES	4.4 – 17	Socio/EJ Need for Power	List commitments to reduce physical impacts of construction.		7/15/2008
RES	4.4 – 18	Socio/EJ Need for Power	Provide a copy of RIMS II multipliers used.		7/30/2008
RES	4.4 – 19	Socio/EJ Need for Power	Provide information on any pre-existing health conditions among minority and low-income populations that could result in disproportionate adverse health impacts.		7/2/2008
RES	4.6 – 2	Socio/EJ Need for Power	Indicate which actions to limit adverse impacts during construction are commitments.		7/15/2008
RES	5.8 – 1	Socio/EJ Need for Power	Estimate expenditures within the region for materials and services during operation.		7/15/2008
RES	5.8 – 2	Socio/EJ Need for Power	Estimate tax yields during operations.		7/15/2008

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South Texas Project  
RAI Response Tracking

Status	RAI No.	Subject	RAI	Comments	Response Date
RES	5.8 – 3	Socio/EJ Need for Power	Estimate maximum road congestion during operations.		7/15/2008
RES	8.0 – 1	Socio/EJ Need for Power	Clarify ownership of STP Units 3 & 4.		7/2/2008
RES	9.3 – 6	Socio/EJ Need for Power	Reconcile conflicting socioeconomic impact levels for the Limestone site.	Note: On socioeconomic grounds, now preferred to STP Site	7/2/2008
RES	9.3 – 7	Socio/EJ Need for Power	Reconcile conflicting socioeconomic impact levels for the Allens Creek site.	Note: On socioeconomic grounds, now preferred to STP Site	7/2/2008
RES	9.3 – 8	Socio/EJ Need for Power	Reconcile conflicting socioeconomic impact levels for the Malakoff site.	Note: On socioeconomic grounds, now preferred to STP Site	7/2/2008
RES	3.7 – 1	Trans Lines	Explain whether the replacement of transmission line towers would result in impacts outside existing transmission line corridors.		7/30/2008
RES	2.2.1 – 1	Land Use Alt Sites	Revise Tables 2.2–1 and 2.2–2 in the ER to reflect land occupied by STP units 1 and 2 and auxiliary facilities.		7/2/2008
RES	2.4.1 – 1	Terres Ecology	Provide information regarding terrestrial species composition and abundance by habitat type on the STP site.		8/14/2008
RES	2.4.1 – 2	Terres Ecology	Provide current information on the type and relative abundance of migratory bird species and waterfowl using the habitats on the STP site, potential impacts to these populations, and proposed mitigation measures to limit impacts during construction and operation.		8/14/2008
RES	5.3.1.2 – 5	Aquatic Ecology	Please describe the proposed bank stabilization project and its impact on terrestrial and aquatic resources.		8/14/2008

RES = resolved; NFA = no further action; RAI = additional information needed

South Texas Project  
RAI Response Tracking

Status	RAI No.	Subject	RAI	Comments	Response Date
RES	5.3.2 – 1	Aquatic Ecology	Provide information on how aquatic resources may be impacted by discharges at outfall 001.		8/14/2008
RES	5.3.4 – 1	Aquatic Ecology	What are the annual maximum and minimum flow rates and temperatures for the Colorado River in the vicinity of the blowdown structure on the Colorado River? What is the frequency planned for discharging at outfall 001?		8/14/2008
RES	4.2 – 13	Hydrology	Provide information regarding dewatering discharge locations, any required ditches and retention ponds and associated permits, storm water outfalls, storm water treatment, and water bodies into which storm water will be discharged.		8/14/2008
RES	10.5S – 1	Hydrology	Describe groundwater conservation and other mitigative measures as noted in Section 10.5S.1.2.		8/14/2008
RES	4.5 – 3	Rad. Health	What was the thought process for using Units 1 & 2 Annual Effluent Report data for 2005 to calculate air pathway doses to construction workers?		7/2/2008
RES	4.4 – 3	Socio/EJ Need for Power	Re-calculate wage impacts using more realistic wage rates.		8/14/2008
RES	4.4 – 14	Socio/EJ Need for Power	Provide a copy of any studies of the socioeconomic impacts on Calhoun and Jackson Counties.		8/14/2008

RES = resolved; NFA = no further action; RAI = additional information needed

South Texas Project  
RAI Response Tracking

Status	RAI No.	Subject	RAI	Comments	Response Date
	2.4.2 – 1	Aquatic Ecology	Provide the results of the 12 months of aquatic resource sampling in the Colorado River.		9/16/2008
	2.4.2 – 3	Aquatic Ecology	Characterize the aquatic resources in the MCR.		9/16/2008

## South Texas Project RAI Response Tracking

### Key to Status Identifiers

RES = resolved (the RAI was answered appropriately and completely)

NFA = no further action (the RAI response was deficient, but provided enough information to move forward; the information is apparently unavailable from STP or perhaps any source; we will or have resolved the issue on our own)

RAI = additional information needed (the response appears to be adequate, but requires some clarification; the response was deficient; the response led to new questions). If we require additional information from the applicant for any reason, at this point it must be requested through the RAI process.