Doris Mendiola

From: SusquehannaEIS Resource
Sent: Tuesday, August 12, 2008 5:03 PM
To: Andrew Stuyvenberg
Subject: FW: Comments on Draft SEIS for Susquehanna
Attachments: Comments on Draft SEIS.com.doc

From: Janati, Rich [mailto:rjanati@state.pa.us]
Sent: Thursday, July 17, 2008 9:15 AM
To: SusquehannaEIS Resource
Subject: FW: Comments on Draft SEIS for Susquehanna

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<<Comments on Draft SEIS.com.doc>>
Chief, Rulemaking, Directives and Editing Branch
U.S. Nuclear Regulatory Commission

Attached please find the Pennsylvania Department of Environmental Protection's comments and observation on the draft SEIS for License Renewal of Susquehanna Steam Electric Station.

If you have any questions or need additional information, please let me know.

Sincerely,

Rich Janati
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Bureau of Radiation Protection
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Add = A. Stuyvenberg (ALS3)

Chief, Rulemaking, Directives and Editing Branch
U.S. Nuclear Regulatory Commission

The Pennsylvania Department of Environmental Protection (PA DEP) has completed its review of the draft Supplemental Environmental Impact Statement (SEIS) for License Renewal of Susquehanna Steam Electric Station (SSES), Units 1 and 2. The following is a summary of the department's comments and observations:

Air Quality

Asbestos: Asbestos containing materials (ACM) may be present on-site. In the event that the project includes the disturbance of any ACM, it may be subject to the federal asbestos regulations found at 40 CFR Part 61, Subpart M, beginning at CFR 61.140.

Fugitive Emissions: Construction and earthmoving activities must comply with 25 Pa. Code Sections 123.1 and 123.2. These sections generally require that: 1) reasonable measures must be taken to minimize airborne dust nuisances from construction activities, 2) any dirt drag-out onto paved streets must be promptly removed, and 3) any airborne dust generated from construction activities may not visibly cross off-property.

Environmental Cleanup:

The draft GSIS does not include the installation of additional storage tanks if the Susquehanna Steam Electric Station's license is renewed. There are currently 4 Chapter 245-regulated UST's and 7 Chapter 245-regulated AST's at the facility. There are no outstanding enforcement actions listed in eFACTS against this facility. Table E-2 should be revised to show that tank 011A (7,000 gallon diesel AST) was permanently closed-in-place on February 20, 2008. If the license application is not approved and the power station is decommissioned, then the tanks will have to be properly closed/removed under the direct on-site supervision of a certified tank remover in accordance with regulations contained in Title 25 PA Code Chapter 245.

Radiological

PA DEP has no major concerns with the draft SEIS as we had previously provided extensive comments to the NRC on the draft Generic Environmental Impact Statement for License Renewal of Nuclear Power Plants, NUREG-1437. Additionally, PA DEP staff participated in the NRC environmental audit of the license renewal application at SSES and provided feedback to the NRC on issues related to storage of radioactive waste and environmental monitoring program at SSES.

We would however like to request that the final SEIS include a summary of the on-site radiological groundwater monitoring program at SSES, including a map of the existing monitoring wells. In addition, information regarding the scope of sampling program and the location of any future monitoring wells that may be planned would be highly desirable.

Regarding management and disposal of low-level radioactive waste (LLRW), we believe that the existing LLRW storage facility at SSES is capable of storing Class B and C waste (at the current annual

generation rate) for several years following the closure of Barnwell disposal facility to the generators outside the Atlantic Compact (Connecticut, New Jersey and South Carolina). This should also be confirmed in SEIS.

Regarding storage of spent nuclear fuel (SNF), we have publicly expressed concerns regarding long-term storage of SNF on-site. However, we recognize the need for an Independent Spent Fuel Storage Installation at SSES due to the lack of a permanent repository for SNF in the United States. The Commonwealth has been a strong advocate for the creation of a permanent national repository of SNF and high-level radioactive waste at the Yucca Mountain site in Nevada.

Waste Management:

During decommissioning of the plant, PPL should consider deconstruction and salvage to reduce waste disposal to the extent possible. All construction and demolition waste that cannot be salvaged or recycled should be properly transported and disposed of at a DEP-permitted facility. Open burning of waste is not acceptable.

Watershed Management:

Construction of new facilities or other site work that would encroach on waterways or wetlands, or earth disturbance of more that 1 acre would require appropriate Permits or approvals.

We appreciate the opportunity to provide comments on the draft SEIS for the License Renewal Application being considered for SSES by the NRC.