Commonwealth of Pennsylvania

Department of Environmental Protection

Water Management: The proposed transmission line to transport sewage from the Bell Bend facility should be sized to handle flows from both the Susquehanna Steam Electric Station (SSES) and the Bell Bend facility, should SSES decide to terminate the existing Outfall 079 river discharge in the future.

Act 537 Planning approval for the facility's sewage is needed. Since Berwick is located in the Northcentral Region of DEP, that regional office will need to be contacted for that approval.

The Application did not identify the need to obtain a Water Quality Management Permit for the industrial wastewater treatment facilities that will be constructed to treat the wastewater before it is discharged to the Susquehanna River.

A detailed evaluation of the combined thermal effects of both the SSES and the proposed Bell Bend discharge will need to be included in the NPDES application.

The Application does not include all of the detailed information that is required to determine if the project will conform to all Water Management Program requirements.

The Application states that the closest impaired water body to the proposed project is the Little Nescopeck Creek. The closest 2008 Integrated Water Quality Monitoring and Assessment report listed impaired water body is the Susquehanna River.

Stream habitat assessment should be included in the measurement of success for the comparison of the natural stream design sections to the reference stream sections.

The effects of thermal discharges, chemical additives in discharges, impingement and entrainment issues of aquatic organisms from the existing SSES and the proposed Bell Bend facility intake and blowdown structures should continue being addressed together due to the close proximity of these intake structures to the Susquehanna River.

Watershed Management: There are issues related to filling the wetlands which may have a large impact on the project. Wetland replacement may be an issue.

There is an issue with Walker Run, with wild trout being found in a stream not on the Pa. Fish and Boat Commission's wild trout list. If the stream is reclassified, there is the potential that we will have to deal with EV wetlands. Current project design calls for a section of this stream to be relocated and piped.

Groundwater Monitoring: The application describes the pre-application hydrological monitoring program that will be implemented at the BBNPP site, including installations of groundwater (GW) monitoring wells. It is recommended that the applicant continue to maintain the existing wells, following the completion of the pre-construction phase, and for the purpose of future GW monitoring. The applicant should also make a commitment to develop and maintain a GW Monitoring and Protection Program, during plant operations, to comply with the industry’s GW Protection Initiative.

Radioactive Waste Management/Low-Level Radioactive Waste (LLRW): The application contains a discussion of potential actions or measures to reduce the amount of Class B and C wastes. It is expected that the applicant will develop and implement an effective waste minimization plan to minimize the generation of all types of waste including

Class A and Greater-Than-Class C (GTCC) wastes. Additionally, the planned Radioactive Waste Processing Building at BBNPP may not have sufficient capacity for on-site storage of LLRW considering uncertainties associated with the future of LLRW and GTCC disposal. It is recommended that the applicant construct a separate temporary storage facility for LLRW and GTCC wastes, during the initial construction of the facility.

Radioactive Waste Management/Spent Nuclear Fuel (SNF): The Commonwealth has publicly expressed concerns regarding long-term storage of SNF at reactor sites. Considering that there is currently no permanent repository for SNF, it is possible that there will be a need for an Independent Spent Fuel Storage Installation (ISFSI) at the proposed BBNPP site in the future. Therefore, the applicant should demonstrate that the proposed site is adequate for construction of an ISFSI and dry storage of SNF during normal and extended plant operations, as applicable.