Enclosure 2 Redacted Version Response to NRC Request for Additional Information Set No. 21 Bell Bend Nuclear Power Plant

# RAI Set 21

## Question 02.01.02-1

NUREG 0800, Section 2.1.2(II) 2 states "A highway, railroad, or waterway may traverse the exclusion area but should not be so close to the facility so as to interfere with normal operations. In addition, appropriate and effective arrangements should be made to control traffic on the highway, railroad, or waterway in the case of an emergency." BBNPP FSAR Section 2.1.2.3 states that North Market Street and Confers Lane cross the Exclusion Area. Please describe the arrangements for traffic control on these streets during emergencies.

## Response

The exclusion area boundary (EAB) for BBNPP is a circle with a radius of 2,270 ft (692 m) or approximately 0.43 mi (0.69 km) measured from the centerpoint of the Reactor Containment Building as depicted on FSAR Figure 2.1-4. North Market Street intersects the EAB twice; passing west of the BBNPP powerblock. Confers Lane passes east of the BNNPP powerblock and EAB, and does not intersect the BBNPP EAB. Luzerne County, in which Salem Township is located, and the Pennsylvania Emergency Management Agency both certified that they will amend or modify their respective Radiological Emergency Response Plans to accommodate the Emergency Planning requirements for BBNPP. FSAR Section 2.1.2.3 will be updated to remove the reference to Confers Lane traversing the BBNPP EAB and to add a statement describing planned arrangements with State and Local emergency planning agencies for traffic control on North Market Street.

### **COLA Impact**

The BBNPP FSAR will be updated in a future COLA revision to incorporate the changes to FSAR Section 2.1.2 that are identified below:

### 2.1.2.3 Arrangements for Traffic Control

North Market Street and Confers Lane traverses the BBNPP EAB. US Route 11 provides access to the SSES Units 1 and 2 and the BBNPP site via North Market Street, Beach Grove Road, and Confers Lane. <u>PPL Bell Bend, LLC will make arrangements with Salem Township and with the Pennsylvania State Police for control of traffic on North Market Street in the event of an emergency. The Pennsylvania Emergency Management Agency and Salem Township will incorporate traffic control provisions in their emergency procedures.</u>

# Question 02.01.02-2

NUREG 0800, Section 2.1.2(II) 1 states "To meet the requirements of 10 CFR Part 100, the applicant must demonstrate, before issuance of a CP or limited work authorization, that it has the authority within the exclusion area as defined in 10 CFR 100.3, or must provide reasonable assurance that it will have such authority before either the start of construction or commencing activities allowed by 10 CFR 52.25." NUREG 0800, Section 2.1.2(II) 1 also states that "Absolute ownership of all lands within the exclusion area, including mineral rights, is considered to carry with it the required authority to determine all activities on this land and is acceptable." BBNPP FSAR Section 2.1.2.1 states that "PPL Bell Bend LLC is in the process of acquiring all mineral rights on the site." Please clarify whether the applicant owns the mineral rights.

## Response

The Bell Bend Power Plant EAB intersects five properties for which PPL Bell Bend, LLC does not currently have ownership, including mineral rights, or exclusion authority. PPL Bell Bend, LLC will obtain ownership, including mineral rights, or other forms of exclusion authority for properties intersected by the EAB. A new figure illustrating the EAB and adjoining properties will be added to FSAR Section 2.1.

## **COLA Impact**

The BBNPP FSAR and ER will be updated in a future COLA revision to incorporate the changes to FSAR Section 2.1.2 and ER Section 2.2.1 that are identified below:

FSAR Section 2.1.2

### 2.1.2.1 Authority

The BBNPP site was originally comprised of multiple parcels ranging in size from 1 acre (0.4 hectares) to 228 acres (92 hectares), totaling 424 acres (172 hectares). The Owner Controlled Area is 882 acres (357 hectares). An additional 384 acres (155 hectares) along the rail road and the North Branch of the Susquehanna River is adjacent, but detached from the main parcel. PPL Bell Bend LLC is in the process of acquiring all mineral rights on the site.

PPL Susquehanna, LLC, a subsidiary of PPL Generation, LLC owns 90% of the existing SSES Units 1 and 2. Allegheny Electric Cooperative owns 10%. PPL Bell Bend, LLC, owner of owns the BBNPP project. PPL Bell Bend, LLC and PPL Susquehanna, LLC, for their respective parceled areas within the BBNPP EAB, possess the authority to determine all activities including the exclusion and removal of personnel and property. PPL Bell Bend, LLC, and PPL Susquehanna, LLC, for their respective parceled area within the BBNPP EAB, will exercise dominion and control in the event of an emergency to afford protection of public health and safety. There are five parcels outside the site boundary, but within the BBNPP EAB as shown in Figure 2.1-37, for which PPL Bell Bend, LLC will obtain exclusion authority for these parcels. Control of access to the BBNPP EAB within the site boundary is provided by posting the boundary and performing security patrols.

# 2.1.2.2 Control of Activities Unrelated to Plant Operations

No activities unrelated to plant operation are planned within the BBNPP EAB. No person or entity can reside, build or conduct other activities without approval from PPL Bell Bend, LLC within the BBNPP EAB. One family farm is included in the exclusion area boundary. There are no residents at this farm. Terms of the contract for acquisition of this property by PPL Bell Bend LLC provide access to this farm for family members, provided no residence is established and the area is vacated if PPL LLC requests it. There are five parcels outside the site boundary, but within the BBNPP EAB as shown in Figure 2.1-37, for which PPL Bell Bend does not currently have ownership, including mineral rights. PPL Bell Bend, LLC will obtain exclusion authority for these parcels.

# FSAR Section 2.1 Figure 2.1-37 {EAB Area and Land Owners}

## Withheld from public disclosure in accordance with 10 CFR 2.390

ER Section 2.2.1:

# 2.2.1 THE SITE AND VICINITY

No significant mineral resources within or adjacent to the BBNPP site have been identified. The only mineral resources occurring at the site are siltstone and sand and gravel (PPL, 1972). The siltstone could not be mined economically due its depth. Deposits of sand and gravel underlie most portions of the Susquehanna River Valley. A very small portion of these deposits are under the Susquehanna River floodplain at the OCA. The mineral resources of the land areas of the BBNPP site are owned by the respective surface landowners. There are no mineral resources currently being mined located adjacent to the BBNPP site. PPL Bell Bend LLC is in the process of acquiring all mineral rights on the site.