PMFermiCOLPEm Resource

From: Lemont, Stephen
Sent: Tuesday, September 29, 2009 1:00 PM
To: Randall D Westmoreland
Cc: Olson, Bruce; LaGory, Kirk E.; 'Hayse, John'; FermiCOL Resource
Subject: NRC Comments on 8-25-09 Detroit Edison RAI Responses
Attachments: Status of 8-25-09 RAI responses as of 9-29-09.docx

Randy,

NRC has reviewed Detroit Edison's August 25, 2009, RAI response submittal. Our comments are included in the attachment. We have issues only with the first three RAI responses listed in the attached table, for RAIs AQ2.7-5, AQ3.6.3-1, and AL9.3-1. We found all the other responses to be acceptable and complete.

Regarding the responses to RAIs AQ2.7-5 and AQ3.6.3-1, I believe our comments associated with RAI AQ 2.7-5 were previously discussed, and our comments for RAI AQ3.6.3-1 are minor and straightforward. If Detroit Edison takes no exception to, and will comply with the requests in our comments on those responses, please let me know. Otherwise, please call me to discuss at your earliest convenience.

Regarding RAI AL9.3-1, the response is currently under evaluation, and a conference call to discuss the matter with Detroit Edison may be needed. We will contact you as soon as we have more information on this.

Please contact me if you have any questions or need additional information. I look forward to hearing back from you on RAIs AQ2.7-5 and AQ3.6.3-1.

Thanks,
Steve

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From: Lemont, Stephen

Created By: Stephen.Lemont@nrc.gov

Recipients:
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Tracking Status: None
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Status of August 25, 2009, Detroit Edison Responses to
U.S. Nuclear Regulatory Commission (NRC) Requests for Additional Information (RAIs)
Fermi Nuclear Power Plant, Unit 3 (Fermi 3)
Combined License Application - Environmental Report

RAI Number[1]	Response Date/ ADAMS Accession No.	Status of Response	Question Summary (RAI)	Full Text (supporting information)	Comments
AQ2.7-5 ESRP 2.7 Reg. Guide 1.145, Sec. C 10 CFR 51.50 10 CFR 51.70(b) 10 CFR 51 App. A	8/25/09 ML092400535	Complete	Describe and justify the methodology used to determine distances to the EAB and LPZ.	The determination of distances to the EAB and outer boundary of the LPZ, as discussed during the site audit, were not made according to the methodologies described in the Reg. Guide 1.145.	[9/29/09]Response acceptable. Although the response to RAI AQ2.7-5 is acceptable, NRC is concerned that the changes in the X/Q values will affect the accident analysis. Detroit Edison stated on 9-11-09 that new X/Q values and a revised accident analysis will be provided in response to RAI AC7.1-1.
AQ3.6.3-1 ESRP 3.6.3 10 CFR 51.71(d)	8/25/09 ML092400535	Partially Complete	Provide particulate matter (PM_{10} and $PM_{2.5}$) emission estimations for the proposed natural draft cooling tower (NDCT) and the mechanical draft cooling towers (MDCT).	Section 2.7.2.2 of the ER states that "Sources of air emissions for Fermi 3 include two standby diesel generators, an auxiliary boiler, and a diesel fire pump, as well as a natural draft cooling tower (NDCT) and 4-cell mechanical draft cooling tower (MDCT)." In ER Section 3.6.3.1, emissions for other equipment were presented but emissions of PM (PM_{10} and $PM_{2.5}$) as drift from the NDCT and MDCT were not included.	[9/29/09] Response unacceptable. Assumptions and emission calculations are reasonable. However, there seems to be an incorrect statement in the last paragraph of the response: "Therefore, the maximum hourly and annual emissions of PM_{10} and $PM_{2.5}$ from the simultaneous operation of the NDCT and MDCT are expected to be 3.86 lb/hr and 16.94 tons/yr, respectively". The actual values should be half of the values in the RAI response (i.e., they should be 1.93 lb/hr and 8.47 tons/yr). Detroit Edison mistakenly presented the sum of PM_{10} and

[1] RAI numbers follow a specific form. RAIs apply to a specific section from the Environmental Standard Review Plan (ESRP; U.S. Nuclear Regulatory Commission. 1999. *Standard Review Plans for Environmental Reviews for Nuclear Power Plants*. NUREG-1555. Office of Nuclear Reactor Regulation, Washington, D.C. October, 1999), and the RAI number consists of the relevant ESRP section number followed by a unique number (e.g., the first RAI related to ESRP Section 2.7 would be numbered 2.7-1). If the RAI applies to more that one section of the ESRP, then the next higher section number is used (e.g., if an RAI is applicable to Sections 3.3.4, 3.3.5, and 3.3.6, then the RAI is assigned to Section 3.3, such as 3.3-1).

RAI Number[1]	Response Date/ ADAMS Accession No.	Status of Response	Question Summary (RAI)	Full Text (supporting information)	Comments
					$PM_{2.5}$, but the PM_{10} value already includes the $PM_{2.5}$ value. Detroit Edison needs to submit the corrected information to NRC under oath or affirmation.
AL9.3-1 ESRP 9.3 (I) 10 CFR 51.50(c) NEPA Section 102(2)(C)(iii)	8/25/09 ML092400535	To be determined	Provide a more complete evaluation of the environmental conditions and expected impacts at Candidate Sites A and C.	In order to complete an analysis of the impacts of developing a nuclear plant at Alternative Sites A and C, more information is needed. Provide discussions, analyses, and/or other information to address the following: • The specific modifications that would be required for Sites A and C to establish a viable cooling water option for each. • Conceptual site plans for both Sites A and C. • The anticipated impacts of site development in the following topical areas: – impacts to wetlands; – impacts to other users of the identified water source; – impacts to aquatic and terrestrial species, including threatened and endangered species; – impacts to land use (environmental, recreational, agricultural, other special uses); – impacts to visual resources; and	[9/29/09] Response is currently under evaluation, and a conference call to discuss the matter with Detroit Edison may be needed.

RAI Number[1]	Response Date/ ADAMS Accession No.	Status of Response	Question Summary (RAI)	Full Text (supporting information)	Comments
				– impacts to the receiving water source from projected discharges during operation.	
AE5.2.2-1 ESRP 5.2.2-1 10 CFR 51.71(d)	8/25/09 ML092400535	Complete	Provide an updated description of the design and operation for the fish screening system at the Fermi 2 intake and for the proposed Fermi 3 intake.	The description of the fish screening system in ER Section 5.3.1.2.2 describes a return sluiceway in use at the Fermi 2 intake to return impinged organisms to the lake. However, based on observations made during the site audit, this system uses a mulching process that does not return impinged fish to Lake Erie. An accurate description of the design and operation of the screening system for Fermi 2 is needed and the expected design for the Fermi 3 intake needs to be clarified.	[9/29/09] Response acceptable.
CR4.1.3-3 ESRP 4.1.3 ESRP 5.1.3 10 CFR 51.71 (d) 36 CFR 800	8/25/09 ML092400535	Complete	Provide documentation that identifies the following types of cultural resources within the study areas for the alternatives, including a description of NRHP-listed and -eligible historic properties (archaeological and above ground); National Historic Landmarks, and State Register-listed and -eligible cultural resources (archaeological and architectural).	Information included in this documentation is critical to ensuring a thorough and complete EIS review of project impacts. Information included in this documentation will be used to complete the NEPA analysis and to support compliance with the Section 106 process.	[9/29/09] Response acceptable.
CR4.1.3-9 ESRP 4.1.3 ESRP 5.1.3 10 CFR 51.71(d)	8/25/09 ML092400535	Complete	Provide copies of report(s) evaluating Fermi 1 and Fermi 2 for eligibility for listing in the NRHP. Report(s) should make recommendations regarding NRHP-eligibility of Fermi 1 and Fermi 2, assess the potential	Information included in this documentation is critical to ensuring a thorough and complete EIS review of project impacts. This information will be used to complete the NEPA analysis and to support compliance with the	[9/29/09] Response acceptable.

RAI Number[1]	Response Date/ ADAMS Accession No.	Status of Response	Question Summary (RAI)	Full Text (supporting information)	Comments
36 CFR 800 36 CFR 63			impacts of the Fermi 3 project on Fermi 1 and Fermi 2, and make recommendations for the potential Section 106 effects of the Fermi 3 project on Fermi 1 and Fermi 2. Reports should be in color, and include all figures, photos, and appendices.	Section 106 process.	
HH3.6.3-1 ESRP 3.6.3 40 CFR Part 80	8/25/09 ML092400535	Complete	Explain how the EPA Tier 4 emission standards and fuel sulfur content standards would be met for the stand-by diesel generators and diesel fire pumps.	Emissions for the stand-by diesel generators and diesel fire pumps, presented in ER Tables 3.6-3 and 3.6-5, exceed the EPA Tier 4 emission standards. In addition, the sulfur content of the fuel is presented in the ER as 3% by weight (ER Section 3.6.3.1). The EPA has mandated reductions in sulfur content to 15 ppm effective June 2010 for non-road fuel. The 15 ppm sulfur content standard is also mentioned in 40 CFR 80.520. The requested information will be used in developing the human health assessment.	[9/29/09] Response acceptable.
HY2.3.1-10 ESRP 2.3.1 10 CFR 51.70(b)	8/25/09 ML092400535	Complete	Provide maps that show the full extent of the 100-year floodplains of Swan Creek and Lake Erie in the vicinity of the entire Fermi site.	The extent of the 100-year floodplain was not characterized as far as Swan Creek and along the shore of Lake Erie near the Fermi site in the ER.	[9/29/09] Response acceptable.
TE2.4.1-1 ESRP 2.4.1 10 CFR 51.71 (d)	8/25/09 ML092400535	Complete	Provide handouts used during the terrestrial ecology site audit tour.	Detroit Edison used handouts during the terrestrial ecology site audit tour to show locations of terrestrial ecology survey areas and findings. Handouts will be used to complete analyses that will be presented in the EIS.	[9/29/09] Response acceptable.