

March 16, 2010

MEMORANDUM TO: Robert G. Schaaf, Branch Chief
Environmental Projects Branch 3
Division of Site and Environmental Reviews
Office of New Reactors

FROM: Laura M. Quinn, Project Manager /RA/
Environmental Projects Branch 2
Division of Site and Environmental Reviews
Office of New Reactors

SUBJECT: SITE AUDIT SUMMARY OF CALVERT CLIFFS REVISED
ALTERNATIVE SITES ANALYSIS FOR THE COMBINED
LICENSE APPLICATION

On August 18-19, 2009, the U.S. Nuclear Regulatory Commission (NRC) staff and its contractor Pacific Northwest National Laboratory (PNNL), conducted a site audit of two newly identified alternative sites for the combined license (COL) application for Calvert Cliffs Nuclear Power Plant (CCNPP) Unit 3, submitted by Calvert Cliffs 3 Nuclear Project, LLC, and UniStar Nuclear Operating Services, LLC (collectively referred to as UniStar). The U.S. Army Corps of Engineers (Corps) is a cooperating agency for this review and was also in attendance at the audit, along with other local and state agencies that were invited to attend to assist in areas of their expertise. These new alternative sites were identified in a revised site selection report provided by UniStar in response to a request for additional information by the NRC staff. During the audit the NRC and PNNL staff toured the general vicinity of the two alternative sites. In addition to the site visits, NRC and PNNL staff also performed breakout sessions to review documentation used to develop the new site selection process and the revised environmental report sections of the COL application. Enclosure 1 is the audit plan which provides the itinerary for the site audit. Enclosure 2 is the audit summary. Enclosure 3 is the attendee lists for the site visits and breakout sessions (Agencywide Documents Access and Management System [ADAMS] Accession No. ML092370394). Enclosure 4 is a pamphlet for the East ALCO site (ML092390284), enclosure 5 is a pamphlet for the Carrollton Manor located on the East ALCO site (ML092370395), and enclosure 6 is a map of a draft rezoning plan for the East ALCO site by Fredrick County, Maryland (ML092370396).

Docket No.: 52-016

Enclosures:
As stated

cc w/ enclosures: See next page

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APPLICATION

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NRO-002

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DATE	1/ 11 /2010	1/ 07 /2010	1/22 /2010	3/ 16 /2010

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AUDIT PLAN
Calvert Cliffs Combined License Application Alternative Site Audit
August 17-19, 2009

A) Background

Part 1 of the combined license (COL) application for Calvert Cliffs Nuclear Power Plant (CCNPP) Unit 3, submitted by UniStar, was docketed on January 25, 2008. At that time the staff held alternative site audits for the Crane site on March 17, 2008, and for the R.E. Ginna and Nine Mile Point sites on May 5-6, 2008, which were the original alternative sites submitted with the COL application. UniStar's August 2008 responses to requests for additional information (RAI) from the U.S. Nuclear Regulatory Commission (NRC) staff changed one of the alternate sites for the proposed Unit 3 from the Crane site to the Thiokol site. The NRC staff held an alternative site audit on October 16, 2008, for the Thiokol site. Further RAIs on UniStar's alternative site selection process and the R.E. Ginna and Nine Mile Point sites lead UniStar to reconsider its site selection process. After a public meeting in May 2009 that discussed the process used and the NRC staff's concerns with that process, UniStar decided to redo the alternative site selection process and submit that with the revised environmental report (ER) sections for 9.3. On July 17, 2009, the new alternative information was submitted to the NRC. The two new alternative sites, East ALCO and Bainbridge Naval Training Center, replaced R.E. Ginna and Nine Mile Point. The NRC staff is conducting an audit on the new sites based on this audit plan.

B) Audit Bases

The audit will cover section 9.3 of the COL application and the new alternative site selection process. The staff will be conducting an independent review and verification of the process, references, and analysis of the new information and how they meet the requirements set forth in 10 CFR 51, Section 9.3 of the Environmental Standard Review Plan and other applicable environmental laws.

C) Audit Scope/Methodology

The scope of the audit is the alternative site selection process and an evaluation of the impacts of building a nuclear power plant on those alternative sites.

D) Information and Other Material Necessary for the Audit

"Information Needs" for the audit have been provided to the applicant. They include a list of experts and/or documents related to certain analysis in the new alternative information that the NRC staff has requested to speak with and/or review during the tours and break out sessions.

E) Team Assignments

NRC

Laura Quinn, Project Manager
Alicia Williamson, Co-Project Manager
Harriet Nash, Ecologist
Joseph Giacinto, Hydrologist
Ian Cozens, Hydrologist
Andrew Kugler, Alternatives
Jack Cushing, Alternative

PNNL

Maryann Parkhurst, Team Lead
Corey Duberstein, Terrestrial Ecologist
Roy Kropp, Aquatic Ecologist
Michael Fayer, Hydrologist
Paul Hendrickson, Land Use, Cultural Resources, Alternatives, Socioeconomics

Corps
Kathy Anderson

UniStar
TBD

Other Federal/State Agencies
TBD

F) Logistics/Agenda

Monday, August 17, 2009

Travel day to Frederick, Maryland

7:00pm Pre-briefing with available team members in Hilton Garden Inn, Frederick hotel lobby

Tuesday, August 18, 2009

9:00am Meet in hotel lobby for initial briefing

9:15am Depart for East ALCO Site

10:00am East ALCO Site Tour

12:30pm Lunch Break (Lunch **will not** be provided please get it on the way to the hotel)

1:30pm Breakout Sessions at Hilton Garden Inn, Frederick, MD

4:30pm Closeout with UniStar

5:00pm Depart for Aberdeen, MD

Wednesday, August 19, 2009

9:00am Meet in hotel lobby for initial briefing

9:15am Depart for Bainbridge Site

10:00am Bainbridge Site Tour

12:30pm Lunch Break

1:30pm Breakout Sessions at Clarion Hotel, Aberdeen, MD

4:00pm Closeout with UniStar

4:30pm Debrief with NRC and PNNL only

5:30pm Meeting adjourned

Thursday, August 20, 2009

Travel Day for PNNL staff

AUDIT SUMMARY
Calvert Cliffs Combined License Application Alternative Site Audit
August 18-19, 2009

Overview

In its initial combined license (COL) application, UniStar identified one site in Maryland (the Crane fossil power plant site) and two sites in upstate New York (R.E. Ginna and Nine Mile Point) as its three alternative sites for the Calvert Cliffs Nuclear Power Plant Unit 3 proposed site. The Crane site was later replaced with the site known as the former Thiokol site in southeast Maryland. The New York sites were more recently replaced with two new sites in Maryland - Bainbridge Naval Training Center and East ALCO. This report summarizes the visits to these recently selected alternative sites in Maryland, which were conducted on August 18-19, 2009.

The alternative site visits to the East ALCO and Bainbridge Naval Training Center sites were conducted the mornings of August 18-19, 2009, respectively. During the afternoon of each day, the Nuclear Regulatory Commission (NRC) staff, and Pacific Northwest National Laboratory (PNNL) staff, met with UniStar representatives as well as co-reviewers from the U.S. Army Corps of Engineers (Corps), the Maryland Department of Natural Resources (MDNR), and the Environmental Protection Agency (EPA) to discuss the site visited and review the questions submitted to UniStar prior to the visit. Questions remaining after the visit were the basis of requests for additional information (RAIs) sent to UniStar on September 18, 2009 (ML092450423).

Staff from the NRC, Corps, PNNL, MDNR, EPA, and UniStar and its contractor staff attending the Maryland visits are listed below.

NRC Team

- Laura Quinn Team Lead and Cultural Resources
- Andy Kugler Alternative Sites
- Harriet Nash Ecology, Land Use
- Joe Giacinto Hydrology
- Ian Cozens Hydrology shadow
- Alicia Williamson Socioeconomics and Cultural Resources

PNNL Team

- Mary Ann Parkhurst Team Lead and Alternative Sites
- Paul Hendrickson Alternative Sites and Land Use
- Roy Kropp Aquatic Ecology
- Corey Duberstein Terrestrial Ecology
- Mike Fayer Hydrology

Corps

- Kathy Anderson Baltimore District

MDNR

- Susan Gray
- Connie Faustini, ERM
- Diane Mountain, ERM

EPA

- Kevin Magerr

UniStar, Constellation (CEG), and Contractor Team

- Greg Gibson, UniStar
- Dimitri Lutchenkov, UniStar
- Frank Perdomo, UniStar
- Bob Goldstein, UniStar
- David Klinch, UniStar
- Paul Goldstien, UniStar
- Yvonne Abernethy, CEG
- Bernard Holcomb, CH2M Hill
- Cheryl Baker, CH2M Hill
- Paul Jacobson, Alion Science

Site Selection Process

In response to NRC's RAs of February 3, 2009, and a public meeting on May 8, 2009, UniStar decided to revisit its site selection process to concentrate solely on sites in Maryland and focus almost exclusively on environmental criteria. UniStar's Site Evaluation Report and replacement environmental report (ER) pages with alternative site descriptions were submitted to NRC on July 17, 2009, and were the basis for a set of information needs submitted to UniStar prior to the site visits about issues needing clarification or more information. These information needs were the source of discussion with UniStar and its contractors during the alternative site visit. The information needs can be found in the NRC's Agencywide Document Management System (ADAMS) under accession number ML092340028.

UniStar reviewed the process used in selecting the candidate areas, potential sites, candidate sites, and alternative sites. The initial starting point was a Maryland database of more than 1,000 brownfield sites listed on the State's voluntary cleanup program. Following an initial screening that removed sites located on dedicated land, too close to dense population centers, and too far from water sources or transmission lines, 206 sites remained within the candidate areas. These sites were further screened for properties of at least 420 ac. This screening reduced the list to eight potential sites. Four sites were eliminated for a variety of reasons that would make them unlikely to be licensable (e.g., near the BWI airport and Sparrows Point, not meeting the need for power criterion [an existing fossil fuel facility with high electrical output], or not likely to meet 7Q10 water volume requirements). At this point, a Delphi panel of UniStar and Constellation personnel and contractors reviewed the remaining four sites and ranked 16 resource characteristics for each site, rating them based on defined criteria. Results for each resource were averaged, and the highest ranking of the remaining potential sites became the alternative sites (Bainbridge, EastALCO, Thiokol). This process is discussed in more detail in the August 29, 2009, RA responses from UniStar which can be found under accession number ML092450557 in ADAMS.

Observations: The choice of terrestrial and aquatic resource metrics were questioned by the NRC and PNNL staff as they do not address species and habitat aside from threatened and endangered species and wetland habitat. There are inconsistencies in the selection criteria and some of the scores formed the basis of considerable discussion at the audit. The NRC staff issued RAIs on September 18, 2009 (ML092450423), and UniStar responded on September 25, 2009 (ML092730188 and ML092730187).

East ALCO Works Smelter

East ALCO representatives: Earl Robbins (Public Relations), Tom Barnhouse (Plant Manager), Oscar Fielder (Site Environmental Manager)

On August 18, 2009, the NRC audit group visited the 2200-ac ALCOa East ALCO site in Western Maryland. Following an overview of the plant history and operation, the East ALCO staff provided a tour around the property. The East ALCO plant operated from 1970 to 2005. The peak employment was 1,250 employees, and employment at shutdown was about 625 employees. The site has water, electric, natural gas, and rail service. Most of the East ALCO site is zoned industrial; some is zoned light industrial. Residential areas border some portions of the site perimeter, and Carroll Manor Elementary School is adjacent to the site. Frederick County is currently considering whether to rezone about 770-ac of the site for agriculture use. Approximately 1,300-ac of the site are currently farmed. Corn and soybeans are the predominant crops. A portion of the 420-ac alternative site parcel on the north side of the property is zoned agricultural.

When it was operating, the East ALCO plant consumed up to 350 MW and was the largest industrial consumer of electricity in Maryland and the second highest user after the State of Maryland. An electric substation is on the site. Allegany Power supplied electricity to the plant when it operated. Sempra Energy had applied with the State of Maryland to build a natural gas fired power plant at the site but it was not pursued. Sempra did receive a certificate of public convenience and necessity for the plant from the Maryland Public Service Commission (PPRP case 8997).

The East ALCO terrain is gently rolling farmland. Some of the roads near the property are narrow with no shoulder. However, ALCO was able to successfully ship (via truck) raw materials into, and finished product out of, the property. There are no major surface water bodies on site. Two minor drainages run along the edges of the reactor site; one drainage is unnamed and the other feeds Tuscarora Creek, which could be designated by the state as a trout stream according to the site environmental manager. The streams converge in the southwest portion of the property. Where the creek crosses Manor Woods road (south edge of 420-ac footprint), flow through 3-ft diameter culverts appeared to be much less than 1 cfs. Wetlands exist on the east side of the site by Tuscarora Creek and the unnamed tributary but are not present within the 420-ac footprint. The creek can flood with very heavy rains. Several 2.5- to 10-ac landfills exist on the East ALCO site property, but none are located within the alternative site footprint. Fluoridated materials are the main contaminants in the landfills.

The plant used about 1 million gallons of water per day. Until the mid-1990s, the plant got its water from the Potomac River. Eventually, the plant transitioned to the county water system. The status of the old pipelines to the Potomac is not known and their exact location is uncertain. The water source for a new reactor at the site would be the Potomac River. Groundwater would not be used.

The Potomac River bank is overgrown by trees, and details of the shoreline were not directly observed. A double train track runs along the river just north of the bank. Exposed parts of the riverbed were primarily cobble and rocks.

Recreational use of the river includes kayaking and small radio-controlled boat operation. In the area of potential intake/discharge location, the Potomac River is very shallow and would appear to require excavation, perhaps including blasting. A pipeline to the Potomac would have to cross the C&O Canal, a National Historical Park, and towpath. The canal appeared dry at the time of the visit.

To support a reservoir for an ultimate heat sink, 2.5 billion gallons (5 to 10 ac surface area) would be needed. The East ALCO tour guides were not aware of any surface water or groundwater quality issues in the area and informed us that the depth to groundwater varies from 30 to 90 ft.

The Carrollton Manor House on the south side of Manor Road and across the street from the alternative site footprint is on the National Register of Historic Places. The house was once owned by Charles Carroll, a signer of the Declaration of Independence. The group toured the partially restored house, which was open for tours until about two years ago. Because of its proximity to the alternative site footprint, the view from the house would be significantly affected by construction of a new nuclear plant at the site.

Observations: Questions about the East ALCO site focused primarily on the probable location of a pipeline from the site to the intake structure at the Potomac River. Potential ecological and cultural issues within this corridor and species in the Potomac River were discussed. Water availability was also discussed, and it was not clear whether flow augmentation might be needed. The NRC staff issued RAIs on September 18, 2009 (ML092450423), and UniStar responded on September 25, 2009 (ML092730188 and ML092730187).

Bainbridge Naval Training Center

Bainbridge Representatives: Katherine Heaton (Site Manager)

On August 19, the NRC group visited the Bainbridge site in eastern Maryland. The Bainbridge site was home to the Tome School, which was built in the early 1900s and was bought by the U.S. Navy and used as a training center from 1942 until 1976. The site is a State of Maryland Cooperative Wildlife Management Area in which archery hunting is allowed from September 15 through January 31. A portion of the property is also used as a truck driving school. It is currently being marketed for development.

The proposed location for the reactor would be within the north and west portions of the Bainbridge site, which is flat to somewhat undulating terrain. The terrain in the southwestward boundary of the site toward the Susquehanna River drops off more steeply until it reaches cliffs that abut the town of Port Deposit, which is on the river shoreline. Several paved areas remain within the Bainbridge property, many of which are overgrown. The buildings are in disrepair and many are hidden in brush and trees.

Two capped landfills exist on the Bainbridge site and are dominated by grasses; landfill caps, deed restrictions, and groundwater use restrictions apply. Several areas on the site were contaminated (e.g., asbestos), and all but two areas, the Old Base Landfill (NW near MD 276) and the Fire Training Area (SE near MD 222), were cleaned up by 1999.

The two remaining sites were subjected to institutional controls (deed restrictions on the landfill cap and groundwater restrictions) and long-term groundwater, surface water, and sediment monitoring (EPA 2000; EPA/ROD/R03-00/007). An onsite 2.5-ac reservoir could be used as a reservoir for an ultimate heat sink, but a pipeline would need to be constructed to carry water to and from operations.

One of the UniStar guides estimated groundwater to be 20 to 100 ft deep. The water source for the proposed reactor would be the Susquehanna River. Groundwater would not be used. Our guides were not aware of any surface water or groundwater quality issues in the area. The former Tome School, which was a private school for boys, is near the southern boundary of the Bainbridge property and is outside the area of the alternative site footprint. The school sits on the bluff above Port Deposit but is not visible from the town because of tree cover. The buildings still stand but have been heavily vandalized, and the marble flooring and wiring were removed. The site also contains a few houses and an impressive power house that piped heat to the nearby large buildings through tunnels large enough for students to walk through to get to class in the winter. The school property and buildings were designated a National Historic District in 1984.

The ecologists searched the site for wetlands and streams in an area southwest of the 420-ac footprint. They found remnants of a stream bed that did not have active flow, an area with *Phragmites*, and a small stream with some flow. The banks of this stream bed were steep and cluttered with tree debris. Both streams are in fairly wooded areas with some small open areas. The site onsite reservoir was built on a spring to provide water for the area. The reservoir is roughly triangular in shape with a small outlet over a concrete sill on the southeast corner. The outlet stream is in a steeply incised bed that undercuts some shrubs.

The Susquehanna River below the site is about 4000-ft wide and empties into Chesapeake Bay not far from Port Deposit. The river appeared deep and the flow was fairly slow. Given the location of the town and the topography, it is unlikely that an intake/discharge pipeline would take a direct route down the bluff and into the river. The more likely route for these pipes would be to run south from the site and curve toward the river roughly near Bainbridge Road where there is relatively low topographic relief.

Observations: Although there appeared to be plenty of water available for plant use, a discussion with a basin-wide agency such as the Susquehanna River Basin Commission will be considered to understand whether the water consumption rate would be acceptable to river stakeholders. The path of a pipeline from the site to the Susquehanna River had not yet been identified and may be the source of ecological issues. UniStar referred to the possible presence of a threatened or endangered species in wetlands on or near the site, but did not know the identity of that species. Further investigation will be needed to be undertaken to determine if the species is the shortnose sturgeon or some other species. The NRC staff issued RAIs on September 18, 2009 (ML092450423), and UniStar responded on September 25, 2009 (ML092730188 and ML092730187).

Calvert Cliffs Nuclear Power Plant (Environmental)

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(Revised 11/12/2008)

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