



DEPARTMENT OF THE ARMY
BALTIMORE DISTRICT, U.S. ARMY CORPS OF ENGINEERS
P.O. BOX 1715
BALTIMORE, MD 21203-1715

REPLY TO
ATTENTION OF

May 14, 2010

Operations Division

U.S. Nuclear Regulatory Commission
Ms. Stacey Imboden
Senior Project Manager
11555 Rockville Pike, Mail Stop T-7E18
Rockville, Maryland 20852

Dear Ms. Imboden:

This is in reference to the Bell Bend Nuclear Power Plant project, identified as NAB-2008-01401. In preparation for the 2nd alternative site audit scheduled for the week of June 14, 2010, this office is providing you with a set of information needs (enclosure) that will be forwarded to the applicant (Pennsylvania Power and Light (PPL)) prior to the site audit.

The enclosed list was compiled from information and reports submitted to the Corps of Engineers by the Nuclear Regulatory Commission that included revised sections of the updated COLA (ER sections 9.3) and the Bell Bend Nuclear Power Plant Alternative Site Evaluation Report, dated September 2009, prepared by UniStar Nuclear Energy.

The enclosed list is necessary information that this office needs to help fulfill the Corps requirements for an adequate 404(b)(1) alternatives analysis and the public interest review. Please be informed that additional information needs may be needed as the draft EIS is being developed.

This office appreciates the opportunity to comment and looks forward to working with you in preparation of the final EIS. If you have any questions concerning this matter, please call Mrs. Amy Elliott at (814) 235-0573.

Sincerely,

A handwritten signature in black ink that reads "Wade B. Chandler".

Wade B. Chandler
Chief, Pennsylvania Section

Enclosure

**USACE Information Needs for
Bell Bend Second Alternate Sites Visit**

Info Needs #	ER Section	Information Needed
USACE -1	9.3.2.1	Provide an expert who can discuss the wetland scoring for criterion 16c. (High Quality Wetlands within Site) for the Bell Bend site now that wetlands connected to Walker Run are designated as Exceptional Value wetlands. As the scoring would change from a 5 to a 1, how would this change affect the overall scoring of Bell Bend and the decision that there is no environmentally preferred site?
USACE-2	9.3.2.1	Provide an expert who can discuss the terrestrial resources scoring for criterion 3a. (Endangered / Threatened Habitats) for the Bell Bend site now that the July 1, 2009 letter from U.S. Fish & Wildlife Service has stated that suitable habitat exists on site for the Indiana bat (<i>Myotis sodalists</i>). As the scoring would change from a 5 to a 1, how would that change affect the overall scoring of Bell Bend and the decision that there is no environmentally preferred site?
USACE-3	9.3.2.1	Provide an expert who can discuss the scoring for criterion 2c. (Water Availability) for the Bell Bend site. Your scoring uses a Q7-10 calculated over the last 10 years (1999-2009). However, per the SRBC, the recommended Q7-10 should use the lowest 7-day average flow with a 10% chance of reoccurrence, based on the entire period of record of the referenced gage. If the recommendation by SRBC is followed, then the Q7-10 should be re-calculated for all the alternative site as well as the candidate sites.
USACE-4	9.3.2	Provide an expert who can discuss the screening criteria for consumptive water use at the preferred and alternative sites. Consumptive water use was not used as a sub-set of criterion 2 (Hydrology, Water Quality, & Water Availability), however in the March 1, 2010 letter from the SRBC, the consumptive water use of the Bell Bend site (up to 31 million gallons per day (mgd) has the potential to adversely impact the Susquehanna River.
USACE-5	9.3.2	Provide an expert who can discuss the screening criteria for criterion 7 (Historic & Cultural Resources). It appears that there is no scoring basis for a resource if it is located on site. It also appears that neither sub-criterion 7a. (Historic Buildings, Structures, Objects & Sites) nor sub-criterion 7b (Historic Districts) included potential impacts to archeological sites. The Corps, in its review, requires an analysis of both historic and archeological resources.
USACE-6	9.3.2.1	Provide an expert who can discuss the scoring for criterion 7 (Historic & Cultural Resources) for the Bell Bend site. Based on preliminary results of GAI's Phase II National Register evaluations, two of the seven archeological sites (36LU281 & 36LU285) are recommended as eligible for listing on the NRHP. These sites are within the owner controlled area. As such, the scoring should change. How would this change affect the overall scoring of Bell Bend and the decision that there is no environmentally preferred site?
USACE-7	9.3.2.1	Provide an expert who can discuss the historic and archeological impacts on the Bell Bend site. In Section 5.1.3 of Part 3 of the Environmental Report, it states "Based on results of cultural resources investigations conducted to date, it is likely that there will be adverse impacts to cultural resources from construction."
USACE-8	9.3.2.3	CAN Do, Inc. of Hazleton, PA is the current owner of the Humboldt alternative site. CAN Do., Inc currently has permit applications into the PA DEP Northeast Regional Office and the U.S. Army Corps of Engineers – Baltimore District for authorizations to develop this site into an industrial park. Provide an expert who can discuss this issue and document

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		how/ why this site was chosen as an alternative site if it is currently being proposed as an industrial subdivision.
USACE-9	9.3.2	As provided in Table 9.3-12 – Comparison of Wetland and Waterway Impacts: BBNPP vs. Alternative Sites, provide an expert who can discuss the minimum width ROW requirements for the water line that would need to be constructed at the alternative sites. It is unclear why a water line would require a 120-foot ROW for the installation of two new 60” pipes. The Corps would view this ROW width as excessive and would require a much smaller width. As such, these estimations of impact should be re-calculated.
USACE-10	9.3.2.2	As provided in Table 9.3-12 – Comparison of Wetland and Waterway Impacts: BBNPP vs. Alternative Sites, provide an expert who can discuss the wetland and stream impacts for the new water line ROW at the Montour site. The Corps is aware that an established 12-mile ROW to the West Branch Susquehanna River already exists as part of the coal fired generation plant at Montour. This PPL owned, 12-mile ROW was recently established for the affluent associated with the newly installed scrubbers. As such, any calculation of estimated wetland and/or stream impact should be based on using this established ROW.
USACE-11	9.3.2	As provided in Table 9.3-12 – Comparison of Wetland and Waterway Impacts: BBNPP vs. Alternative Sites, provide an expert who can discuss the minimum width ROW requirements for the transmission lines that would need to be constructed at the alternative sites. It is unclear why a transmission line would require a 300-foot ROW to accommodate the EPR. The required ROW for the Susquehanna-Roseland project (the transmission line that will accommodate the EPR at the Bell Bend site) will be a maximum of 200-feet. For the Susquehanna-Roseland project, PPL Electric Utilities' Vegetation Management Plan recognizes a Wire Security Zone (WSZ) – 17 feet from the lines – that must be maintained; the remaining ROW will allow vegetation re-growth. As such, the Corps would view the 300-foot ROW width as excessive and would require a much smaller width. As such, these estimations of impact should be re-calculated.
USACE-12	9.3.2	As provided in Table 9.3-12 – Comparison of Wetland and Waterway Impacts: BBNPP vs. Alternative Sites, provide an expert who can discuss the wetland and stream impacts for the transmission line ROW for the alternative sites. The Montour site, for example, has two existing 500 kV lines within the 30-mile radius for possible interconnection – one is 14.3 miles away and the other 20.5 miles. Aerial crossings of wetlands and streams should not be viewed as an impact; as such it is unclear how the impact numbers (6.3 acres of wetlands and 2,587 l.ft. of stream) were calculated for the Montour site. In comparison, the transmission line project for the Bell Bend site (Susquehanna-Roseland) will be approximately 100 miles long with a TOTAL wetland impact of 0.58 acres (this accounts for any and all temporary access).
USACE-13	9.3.2	As provided in Table 9.3-7 Summary Comparison of Alternative Sites, provide an expert who can discuss the transmission line criterion and provide a rationale for summarizing impacts as “small to moderate” for the three alternative sites.