

Request for Additional Information No. 5026
Letter Number 2010006
Application Revision 2

8/20/2010

Bell Bend
PPL Bell Bend LLC.

USACE - U.S. Army Corps Of Engineers

EIS USACE-14

This RAI is related to the second alternative sites audit information needs TE-5 (USACE-1), TE-6 (USACE-2), H-10 (USACE-3), CR-9 (USACE-6).

Provide revised scoring for the BBNPP site that includes a cumulative sensitivity analysis for the criteria that need to be updated. The sensitivity analysis should include the changes related to:

- 1.) Criterion 16c (High Quality Wetlands within site). EV wetlands onsite would change the score from a 5 to a 1.
- 2.) Criterion 3a (Endangered / Threatened Habitats). Suitable Indiana bat habitat onsite would change the score from a 5 to a 1.
- 3.) Criterion 7 (Historic and Cultural Resources). Section 106 of the National Historic Preservation Act (NHPA) requires consideration of the effect of the undertaking (i.e., the construction and operation of the proposed reactor) on eligible as well as listed resources. There are several eligible resources onsite; as such the scoring should reflect these resources.
- 4.) Criterion 2c (Water Availability). The SRBC 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. As such, the scoring should be re-calculated using the SRBC recommended approach.

Full Text (Supporting Information)

Appendix C (Environmental Scoring Justification for BBNPP site) in the submitted scoring/ranking study should reflect current up to date changes on the following ranking criteria:

- 1.) criterion 16c (High Quality Wetlands within Site); 2.) criterion 3a (Endangered / Threatened Habitats); 3.) criterion 7 (Historic and Cultural Resources); and 4.) criterion 2c (Water availability).

EIS USACE-15

This RAI is related to the second alternative sites audit information need CR-10 (USACE-7).

Provide a clearance letter from the PA-SHPO regarding historic and archeological impacts on the BBNPP site; SHPO clearance and any requirement from SHPO for mitigation to address adverse impacts will affirm the required compliance under Section 106 of the NHPA.

Full Text (Supporting Information)

Section 5.1.3 of Part 3 of the ER 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.”

EIS USACE-16

This RAI is related to the second alternative sites audit information need H-11 (USACE-4).

Provide appropriate SRBC review and approval documentation for the consumptive water use for the BBNPP site. Provide any and all mitigation measures that SRBC will require for impacts to consumptive water use.

Full Text (Supporting Information)

The scoring/ranking study did not include criteria for consumptive water use, however, according to the March 1, 2010, letter from the SRBC, the consumptive water use of the BBNPP site (up to 31 mgd) appears to have the potential to adversely impact the Susquehanna River.

EIS USACE-17

This RAI is related to the second alternative sites audit information need LU-11 (USACE-9).

Recalculate the impacts to wetlands and waterways for the water lines at the alternative sites. Re-calculation should include:

- 1.) Reducing the minimum width ROW for the two 60” pipes from 120-feet to 80-feet in sensitive areas including wetlands/waters.
- 2.) Conceptual water lines that were drawn for the alternative sites included substantial impacts to wetlands/waters. Avoidance and minimization efforts should be included in the re-design and the re-calculation to keep the water lines out of wetlands/waters area.

Full Text (Supporting Information)

ER Section 9.3 Alternative Sites; Table 9.3-12 – Comparison of Wetland and Waterway Impacts: BBNPP vs. Alternative Sites; and mapping information provided at the audit showing conceptual water lines at the alternative sites.

EIS USACE-18

This RAI is related to the second alternative sites audit information needs LU-13 (USACE-11) and LU-14 (USACE-12).

Recalculate the impacts to wetlands and waterways associated with the location of the transmission lines at the alternative sites. Recalculation should include:

- 1.) A sensitivity analysis of the 300-foot wide ROW to accommodate the EPR design. An analysis should document if this ROW can be reduced and by how much; any reduction in the size of the ROW should correspond to a reduction in impacts (through avoidance and minimization).
- 2.) Aerial crossings of wetlands and streams do not require 404 permits from the Corps. As such, aerial crossings should not be viewed as a direct impact but rather should be dissected and calculated by impact type (temporary, permanent, and conversion acreages).

Full Text (Supporting Information)

ER Section 9.3 Alternative Sites; Table 9.3-12 – Comparison of Wetland and Waterway Impacts: BBNPP vs. Alternative Sites; and mapping information provided at the audit showing the location of the transmission lines at the alternative sites.

The ROW for the Susquehanna-Roseland project (the transmission line that will accommodate the EPR at the BBNPP site) will be a maximum of 200 feet wide. 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.

EIS USACE-19

This RAI is related to the second alternative sites audit information need LU-15 (USACE-13).

Provide revised ER section that incorporates the recalculations for Table 9.3-12. Revised ER section should discuss the transmission corridor criterion and provide a rationale for summarizing impacts as “small to moderate” for the three alternative sites.

Full Text (Supporting Information)

ER Section 9.3 Alternative Sites; Table 9.3-12 – Comparison of Wetland and Waterway Impacts: BBNPP vs. Alternative Sites & Table 9.3-7 Summary Comparison of Alternative Sites.