



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

August 26, 2010

Ms. Amy Elliot
US Army Corps of Engineers- Baltimore District
State College Field Office
Suite 102
State College, PA 16801

Ms. Elliot:

As you are aware, the Environmental Protection Agency (EPA) along with other state and Federal resource agencies have participated in a series of Nuclear Regulatory Commission's environmental audits as part of the environmental review process for the proposed Bell Bend project. Among other things, the purpose of participating in these audits are to work with lead Federal agency and project sponsor to identify and address environmental issues early on in the National Environmental Policy Act (NEPA) review and Section 404 of the Clean Water Act permitting processes.

In keeping with this intent, EPA has concern with the proposed alternative site analysis. EPA believes the exclusionary criteria used to screen out candidate sites are not being used consistently. As stated in the analysis, unsuitable sites are removed for not meeting one of the four exclusionary criterions. The four exclusionary criterions include: Population, Transmission, Dedicated Land, and Water. The specific concern is with the use of the water exclusionary criteria. The criteria states, "Water – Not located more than 15 mi (24.1 km) from a cooling water source capable of providing 50 million gallons per day (MGD) (189 million liters per day [mid] or more". If the candidate site does not meet any one of the exclusionary criteria it is removed for further consideration. The Beiler site was dropped from further consideration after reconnaissance level information and cursory evaluation determined that a viable water source, the Chesapeake Bay, would be 15 miles away and require significant dredging. The lack of consistency arises with the use of the water exclusionary criteria application to both Humboldt and Seedco sites. In both cases, the straight line distance to a cooling water source is less than the water exclusionary criteria of 15 miles. However, after obtaining minimal reconnaissance level information and cursory evaluation of the area topography it becomes apparent that the direct line distance cannot be used and that the actual distance is beyond the water exclusionary criteria of 15 miles. EPA concludes based on the water exclusionary criteria that both the

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Humboldt and Seedco should be dropped or otherwise be modified to address the longer distance.

Further, EPA has concern with the highest scoring alternative sites and the preferred site all being located in the same basin. EPA believes that a viable water resource is one that is capable of meeting the needs proposed project as well as needs of the watershed. By limiting the candidate sites to one watershed runs the risk of project failure if the watershed needs are not met. As you know, the Susquehanna River Basin Commission (SRBC) is responsible managing the water resource where all the candidate sites are located. Due to the magnitude of the water consumptive use of the Bell Bend project and other demands of the water resource the SRBC has express concerns of potential adverse impacts to the Susquehanna River not only to the local reach but negative impact to the river further downstream. EPA believes the alternative site selection process should be revised so as to avoid the situation where as all candidate sites are located in a single watershed.

If you have any questions regarding these concerns please don't hesitate to call Jamie Davis at (570) 842-1044 or myself at (215) 814 -5724.

Sincerely,



Kevin Magerr
Environmental Engineer

cc: Stacey Imboden, NRC

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