CCNPP3COLA PEmails

From: Lutchenkov, Dimitri [dimitri.lutchenkov@unistarnuclear.com]
Sent: Monday, January 03, 2011 1:14 PM
To: 'Francis, Woody NAB02'; Quinn, Laura
Cc: 'Anderson, Kathy NAB02'; Burkman, Jim; Gibson, Gregory T; Massie, Wayne A
Subject: RE: UN#10-099 -- Air Conformity (UNCLASSIFIED)
Attachments: UN#10-126 - Air Conformity Commitment Closure.pdf

The Calvert Cliffs Air Conformity Analysis report forwarded via e-mail below identified all construction-related emissions, "direct" and "indirect" (Tables 3-1 and 3-2, respectively), for the pre-construction (as defined by the NRC) and construction periods. Table 3-1 of the report presents a summary of the VOC and NOx emissions for the DC-MD-VA Ozone Nonattainment Area. Table 3-1 shows that the annual VOC conformity threshold limit of 50 ton/yr is not exceeded during any year. Table 3-1 shows that the annual NOx conformity threshold limit of 100 ton/yr is exceeded during the 2nd and 4th through 8th years of construction. Table 3-2 of the report presents a summary of the VOC and NOx emissions for the Baltimore Nonattainment Area. Table 3-2 shows that all of these emissions are "indirect" and neither the VOC or the NOx conformity threshold limits are exceeded during any year.

At the request of the NRC a breakout of safety-related (SR) emissions was conducted. The results of this breakout are presented in Table 3-3 of the Calvert Cliffs Air Conformity Analysis. Table 3-3 shows that during the first two years of construction, defined as "pre-construction", there are no SR emissions. Table 3-3 shows that the annual NOx conformity threshold limit for SR emissions is exceeded during the 5th through 8th years of construction. It should be noted that the 4th year in Table 3-3 is not identified as a year in which the NOx conformity threshold limit is exceeded as it is in Table 3-1.

USACE should consider any emissions not identified as SR to be impacts due to construction activity associated with the work under Corps jurisdiction. It is understood that each agency will make their own determination and that both "direct" and "indirect" emissions need to be considered. As such, the construction emissions identified in the Calvert Cliffs Air Conformity Analysis (Table 3-1 and 3-2) represent the total construction related emissions for determination.

As identified in UniStar letter UN10-126, dated April 30, 2010 (attached);

"UNE will continue to seek opportunities to reduce and mitigate the projected emissions through efficient construction planning, use of lower-emitting equipment and other available means. Additionally, UNE will offset emissions with certified emission reduction credits (ERCs) from the Washington, D.C. Metropolitan (MD-DC-VA) ozone nonattainment area and/or the Baltimore ozone nonattainment area. UNE has confirmed that there are more than sufficient ozone-precursor ERCs and will secure them in a timely manner as required by regulations to proceed with construction."

Regards,
Dimitri Lutchenkov
Director | Environmental Affairs|
UniStar Nuclear Energy
410-470-5524 | m 410-370-9090

-----Original Message-----
From: Francis, Woody NAB02 [mailto:WOODY.FRANCIS@usace.army.mil]
Sent: Thursday, November 18, 2010 12:20 PM
To: Lutchenkov, Dimitri; Anderson, Kathy NAB02
Cc: Burkman, Jim; Quinn, Laura
Subject: RE: UN#10-099 -- Air Conformity (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Dimitri: We have reviewed the Air Conformity Report and have discussed with the NRC. The Corps will need to know what the emissions would be during construction activity associated with the work under Corps jurisdiction within wetland/stream/waterway etc. and for future maintenance dredging, and what is the proposed offset and mitigation if the work exceeds the thresholds (for each year) of 100 tons per year?

How soon can Unistar get the answers to us so that it can be included in the FEIS?

Thanks

woody

-----Original Message-----
From: Lutchenkov, Dimitri [mailto:dimitri.lutchenkov@unistarnuclear.com]
Sent: Friday, November 12, 2010 3:54 PM
To: Anderson, Kathy NAB02; Francis, Woody NAB02
Cc: Burkman, Jim
Subject: UN#10-099 -- Air Conformity
Importance: High

As requested, attached is the Calvert Cliffs air conformity analysis developed by AECOM for UniStar and submitted to the NRC.

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Classification: UNCLASSIFIED
Caveats: NONE

Hearing Identifier: CalvertCliffs_Unit3Cola_Public_EX
Email Number: 1617

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Subject: RE: UN#10-099 -- Air Conformity (UNCLASSIFIED)
Sent Date: 1/3/2011 1:14:21 PM
Received Date: 1/3/2011 1:14:24 PM
From: Lutchenkov, Dimitri

Created By: dimitri.lutchenkov@unistarnuclear.com

Recipients:
"'Anderson, Kathy NAB02'" <Kathy.Anderson@usace.army.mil>
Tracking Status: None
"Burkman, Jim" <Jim.Burkman@constellation.com>
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"'Francis, Woody NAB02'" <WOODY.FRANCIS@usace.army.mil>
Tracking Status: None
"Quinn, Laura" <Laura.Quinn@nrc.gov>
Tracking Status: None

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MESSAGE	4404	1/3/2011 1:14:24 PM
UN#10-126 - Air Conformity Commitment Closure.pdf		287174

Options
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Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

Greg Gibson
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750 East Pratt Street, Suite 1600
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UniStar
NUCLEAR ENERGY

10 CFR 50.4
10 CFR 52.79

April 30, 2010

UN#10-126

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: UniStar Nuclear Energy, NRC Docket No. 52-016
Calvert Cliffs Nuclear Power Plant, Unit 3, Calvert County, Maryland
Calvert Cliffs NOx Emissions Commitment Closure

Reference: UniStar Nuclear Energy Letter UN#10-099 from Greg Gibson (UNE) to Document Control Desk, U.S. NRC, Revised NO_x and Volatile Organic Compound (VOC) Emissions and Air Conformity Report, dated April 7, 2010.

The purpose of this letter is to close Commitment CC-09-0009, which committed to transmit proposed Calvert Cliffs Nuclear Power Plant, Unit 3, NOx emission mitigation measures.

UniStar Nuclear Energy (UNE) has reviewed the final revised General Conformity Regulations issued by the U.S. Environmental Protection Agency on March 24, 2010. The review was crucial in ensuring that the developed mitigation for the projected emissions calculated in the reference met the latest regulatory requirements. UNE will continue to seek opportunities to reduce and mitigate the projected emissions through efficient construction planning, use of lower-emitting equipment and other available means. Additionally, UNE will offset emissions with certified emission reduction credits (ERCs) from the Washington, D.C. Metropolitan (MD-DC-VA) ozone nonattainment area and/or the Baltimore ozone nonattainment area. UNE has confirmed that there are more than sufficient ozone-precursor ERCs and will secure them in a timely manner as required by regulations to proceed with construction.

This letter closes Commitment CC-09-0009. This letter contains no new regulatory commitments. This letter does not contain any sensitive or proprietary information.

If there are any questions regarding this transmittal, please contact me at (410) 470-4205, or Mr. Dimitri Lutchenkov at (410) 470-5524.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 30, 2010

Greg Gibson

cc: Surinder Arora, NRC Project Manager, U.S. EPR Projects Branch
Laura Quinn, NRC Environmental Project Manager, U.S. EPR COL Application
Getachew Tesfaye, NRC Project Manager, U.S. EPR DC Application
Loren Plisco, Deputy Regional Administrator, NRC Region II
Silas Kennedy, U.S. NRC Resident Inspector, CCNPP, Units 1 and 2
U.S. NRC Region I Office

bcc: Jim Burkman – Constellation
Lisa Decker – Constellation
Carey Fleming – Constellation
Paul Goldstein - Constellation
Thomas Konerth – Constellation
Dimitri Lutchenkov - Constellation
Edward Miller - Constellation