CCNPP3COLA PEmails

From: Quinn, Laura
Sent: Monday, February 14, 2011 11:43 AM
To: Parkhurst, Mary Ann; Kropp, Roy K
Cc: Nash, Harriet; Chapman, Elaine G
Subject: FW: Clarification to Enclosure 3 of UN#11-069 -- Material for MDE Public Notice/Response
Attachments: NRC Comments Enclosure 3 Rev 1.pdf

Roy and Maryann,

Attached are UniStar's responses to the questions that came up when we reviewed their submittal to MDE for the public hearing and some inconsistency in the that submittal and the EIS/BA/EFH.

Please review and let me know if we need to update and numbers in the FEIS based on this and also if we need to include any additional changes in dimensions to NMFS for the BA/EFH.

Thanks
Laura

From: Lutchenkov, Dimitri [mailto:dimitri.lutchenkov@unistarnuclear.com]
Sent: Monday, February 14, 2011 11:39 AM
To: Quinn, Laura
Cc: 'Burkman, Jim'; 'jstewart@mde.state.md.us'
Subject: Clarification to Enclosure 3 of UN#11-069 -- Material for MDE Public Notice/Response

The attached file contains clarification to certain details of Work Descriptions for work in tidal areas.

Regards,

Dimitri Lutchenkov

Director | Environmental Affairs |
UniStar Nuclear Energy
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From: Quinn, Laura

Created By: Laura.Quinn@nrc.gov

Recipients:
"Nash, Harriet" <Harriet.Nash@nrc.gov>
Tracking Status: None
"Chapman, Elaine G" <elaine.chapman@pnl.gov>
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"Parkhurst, Mary Ann" <maryann.parkhurst@pnl.gov>
Tracking Status: None
"Kropp, Roy K" <Roy.Kropp@pnl.gov>
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DISPOSITIONING OF NRC COMMENTS ON ENCLOSURE 3 TO UN#11-069

Notes:

1. Utilizing the project figures, the tidal MDE Work Descriptions are intended to extract, interpret, and describe work being performed in tidal areas only. This tidal Vs nontidal breakdown can lead to some ambiguity when reading the description. However, it is the figures not the Work Description that are incorporated into any permits.
2. The designs provided in the updated figures are consistent with the figures/designs provided to NRC in July 2008. UniStar has recently provided MDE clarifications regarding certain dimensions as requested by MDE. In addition, some of the numbers provided in MDE's project description were developed by MDE, not UniStar, based upon the scaled figures provided by UniStar.
3. The numbers in the left hand column of the table are a cross-reference to the numbers on the annotated Work Description attached.

	NRC Comment	Resolution
1	This appears to be new information. *"(1B) to construct 100 linear feet of stone armor protection a maximum of 95 feet wide extending a maximum of 100 feet from the MHWL parallel to the 180 foot sheet pile wall;"*	This is a component shown in Figure 3b (scaled drawing) which has been defined with a dimension.
2	EIS has 30x**35**x -25 Vs *"(1C) to mechanically dredge a 30-foot long by **30**-foot wide area, 900 square feet, to a depth of -25 feet at MLW"*	UN#10-282 shows 30x35x -25. The work description is an interpretation of the figures which take into account the distinction between tidal and nontidal (USACE does not make this distinction in their reviews). As such, there may be slight interpretation differences in the work description text compared to what is shown in the figures. The shoreline area is actually considered uplands as it has a rip rap all around it and the impact is included in the grading permit. The USACE used the total area of the intake even though part of it was being carved out of the shoreline, there is really no nontidal impact here.
3	Trash rake is new information for EIS (not previously seen in any other documents).	This is a design detail that has not been previously identified but was required for this Work Description document developed by MDE.
4	ER pg 3-31 identifies this dimension as **20** feet. "(ID) to construct a 30 foot by 30 foot trash rack containing two 60-inch intake pipes extending a maximum of **30** feet from the MHWL;"	This is a MDE description of the location of the 60 inch pipe relative to the original shoreline.
5	NRC indicates that they have not seen this scope before. *"(1E) to emplace 30 feet of stone revetment a maximum of 60 feet from the MHWL;"*	This is a design detail that has not been previously called out (implied) which explicitly captures the replacement of existing revetment in place prior to construction.

DISPOSITIONING OF NRC COMMENTS ON ENCLOSURE 3 TO UN#11-069

	NRC Comment	Resolution
6	NRC has a value of 100 cu yd. *"(2A)… resulting in approximately 500 cu. yd. of dredge material;"*	The 500 cu yd value was the original value and has since been refined as the design matured. UN#10-282 identifies 100 cu yd. This appears to be a typo in the draft MDE document forwarded in UN#11-069. The tidal wetland license will be issued at 100 cu. yd.
7	According to NRC this is 48ft in ER not 45ft.	The 3 foot discrepancy is a nuance of design maturity. The fish return is now positioned in the middle of the stone apron. The dimension of the stone apron remains the same and consequently the permanent impact to bay bottom is unchanged.
8	ER defines backfill not clean fill	Based on sediment analysis of material in proposed dredge area, strict interpretations of COMAR specifications, and constructability, the reuse of previously dredged material is not feasible.
9	NRC indicates that they have not seen this scope before. *"(2E) to emplace 70 feet of stone revetment a maximum of 60 feet channelward from the MHWL;"*	This is a design detail that has not been previously called out (implied) which explicitly captures the replacement of existing revetment in place prior to construction.
10	NRC requested that this value be confirmed.	This has been identified as a revised value in UN#10-282. Correction is the result of not reusing dredged material and calculation refinement.
11	(3C) NRC indicates that ER Rev 7 does not give dimensions, only around diffuser.	This detail is not described in the ER but was identified in UN#10-282.
12	NRC indicates that they have not seen this scope before. *"(3F) to emplace 70 feet of stone revetment a maximum of 60 feet channelward of the MHWL;"*	This is a design detail that has not been previously called out (implied) which explicitly captures the replacement of existing revetment in place prior to construction.
13	NRC did the math and indicates that 150 should be 130 to get 195,000 sq ft.	The barge channel varies in width from 100ft to 150ft. The 130 ft wide value utilized in other documentation is the average width. The Work Description utilizes the maximum width for description. The actual quantity (sq ft) of dredge material is calculated by detailed analysis and should not be interpreted as the product of the length and maximum with presented in the Work Description.
14	The "18-inch thick sheet pile wall" is new information.	This is a design detail that has not been previously identified but was required for this Work Description document developed by MDE.

DISPOSITIONING OF NRC COMMENTS ON ENCLOSURE 3 TO UN#11-069

	NRC Comment	Resolution
15	This appears to be new information.	This dimension explicitly identifies that the new sheet pile wall will be 18 inches in front of the existing barge. UN#10-282 discusses this in text.
16	NRC identified this as 40 feet not 30 feet	The distinction is tidal Vs nontidal. Figure 6J shows a dimension of 40 ft for the structure as well as 10 feet and 30 feet for “Nontidal” and “Tidal”, respectively.
17	NRC believes this a typo and should be the same value of 60,000 cu yd. as in (4A)	In UN#10-282 identifies that the barge dock alone is 60,000 cu. yd. (previously 50,000 cu. yd.). The total dredged material (barge channel +discharge pipe + fish return + intake area) was rounded up from 66,600 cu. yd to 67,000 cu. yd. in the Work Descritption.

Unistar Nuclear Energy has applied, in support of a proposed nominal 1,710 Megawatt nuclear power generation station (Unit #3), (1) **to construct an intake area** by (1A) to construct an 18-inch thick sheet pile wall extending a maximum of 180 feet from the MHWL (Mean High Water Line) connecting to the existing baffle wall for the intake area of Unit #1 & #2; (1B) to construct 100 linear feet of stone armor protection a maximum of 95 feet wide extending a maximum of 100 feet from the MHWL parallel to the 180 foot sheet pile wall; (1C) to mechanically dredge a 30-foot long by 30-foot wide area, 900 square feet, to a depth of -25 feet at MLW (Mean Low Water) resulting in approximately 1000 cu. yd. (cubic yards) of dredge material; (1D) to construct a 30 foot by 30 foot trash rack containing two 60-inch intake pipes extending a maximum of 30 feet from the MHWL; (1E) to emplace 30 feet of stone revetment a maximum of 60 feet from the MHWL; (2) **to construct a new fish return** (2A) to mechanically dredge a 65-foot wide area extending a maximum 45 feet channelward of the MHWL to a maximum depth of – 6.5 ft at MLW resulting in approximately 500 cu. yd. of dredge material; (2B) to emplace 40 feet of 18-inch HDPE pipe extending a maximum of 40 feet channelward of the MHWL; (2C) to construct a 10-foot long by 10-foot wide by 2-foot thick stone apron extending a maximum 45 feet channelward of the MHWL; (2D) to emplace approximately 500 cu. yd. of clean sand/stone fill covering the 18-inch HDPE pipe (2E) to emplace 70 feet of stone revetment a maximum of 60 feet channelward from the MHWL; (3) **to construct a discharge pipe** by (3A) to mechanically dredge a 70 foot wide area extending a maximum of 550 feet channelward of the MHWL to a maximum depth of – 16.5 feet at MLW resulting in approximately 5,500 cu. yd.; (3B) to emplace 550' of 30-inch HDPE extending a maximum of 550 feet of the MHWL; (3C) to construct a 20-foot long by 40-foot wide by 2-foot thick stone scour pad extending a maximum of 560 feet channelward of the MHWL; (3D) to construct a discharge diffuser elevated approximately 3 feet above the bottom substrate extending a maximum of 555 feet channelward of the MHWL; (3E) to emplace approximately 5,500 cu. yd. of clean sand/stone fill covering the 30-inch HDPE pipe; (3F) to emplace 70 feet of stone revetment a maximum of 60 feet channelward of the MHWL; (4) **to restore a barge unloading facility** by (4A) to mechanically dredge a 1,500-foot long by 150-foot wide (195,000 sq. ft.) area extending a maximum of 1,500 feet channelward of the MHWL to a maximum depth of - 16 feet at MLW resulting in approximately 60,000 cu. yd. of dredge material; (4B) to construct a 90-foot long by 18-inch thick sheet pile wall within a maximum of 18-inches channelward of an existing deteriorated bulkhead; (4C) to construct a 40-foot long by 40-foot wide by 2-foot thick stone apron extending a maximum of 30 feet channelward of the MHWL; (5) **to dispose of dredge material by** (5A) to transport approximately 67,000 cu. yd. of dredge material to the approved upland disposal site known as Lake Davies located on-site. The purpose of the project is to provide supporting structures and facilities for a proposed nominal 1,710 Megawatt nuclear power generation station (Unit #3). For more information contact Jonathan Stewart at 410-537-3059 or jstewart@mde.state.md.us. The project is located at 1650 Calvert Cliffs Parkway in Lusby, Maryland on the Chesapeake Bay in Calvert County.

DRAFT