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# Susquehanna River Basin Commission

*a water management agency serving the Susquehanna River Watershed*

May 17, 2011

Mr. Terry L. Harpster  
VP-Bell Bend Project-Development  
PPL Bell Bend, LLC  
38 Bomboy Lane, Suite 2  
Berwick, PA 18603

Re: Bell Bend Nuclear Power Plant;  
Water Monitoring Plan – BNP-2010-164;  
Salem Township, Luzerne County, Pennsylvania

Dear Mr. Harpster:

The Susquehanna River Basin Commission (Commission) staff has reviewed the “Water Monitoring Plan” for Bell Bend Nuclear Power Plant (BBNPP) submitted in the referenced correspondence and provides the following comments.

Our comments are as follows:

1. In Attachment 2 on page 2-2 for monitoring point B, in the event that the meters of all the Raw Water Supply System pumps are out of service, the daily surface water withdrawal calculation should use the “highest daily flow recorded at point B” instead of the “last day of data with the flow instrumentation operating.”
2. In Attachment 2 on page 2-2 for monitoring point C, the backup method acceptable to the Commission is the lowest daily average measured at point C. The rationale for adding and subtracting the cooling tower blowdown, albeit measured at different times, is not clear. Similarly, the rationale for adding and subtracting the treated water waste discharge, measured at point D, is not clear, particularly since monitoring point D is downstream from monitoring point C and treated water waste will not be discharged if the meter at monitoring point D is not functioning.
3. The flow indicator for the cooling tower blowdown should be a monitoring point for the “Water Monitoring Plan for BBNPP,” and a backup method should be established in the event that the flow indicator malfunctions.
4. In Attachment 2 on page 2-2, the maximum in-river evaporation is indicated to be 88,000 gallons per day (gpd) in April. In PLE-0024890 dated February 19, 2010, regarding the Susquehanna Steam Electric Station (SSES) Permanent Water Monitoring System, the maximum in-river evaporation occurs in October. The Commission questions the difference in the time of peak in-river evaporation given that the meteorological conditions are similar. The Commission requires further explanation of the method used to calculate in-river evaporation including why the

calculations for BBNPP appear to differ from the SSES calculations. This comment also applies to the table on page 4-3 of Attachment 4.

If you have any questions regarding the above, please contact Paula Ballaron at (717) 238-0423, extension 222.

Sincerely yours,



James L. Richenderfer, Ph.D., P.G.  
Director, Technical Programs

cc: Bradley Wise; PPL-BBNPP  
Michael Canova; USNRC  
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