AES RESPONSE TO FOURTH SET OF ENVIRONMENTAL QUESTIONS

The Licensing Board noted that all of the environmental questions could be answered by both the Nuclear Regulatory Commission ("NRC") Staff and AES, although the Licensing Board explained that at least one party must respond to each question. AES and the NRC Staff have conferred regarding which party is best positioned to respond to the Licensing Board's questions. Based on those discussions, AES is providing a response to one of the ASLB's questions. Below, AES repeats the question, identifies the person(s) providing a response to the question, and responds to the question. Affidavits and statements of qualification for each expert are also provided, as necessary.

ASLB Question 2:

> **Given the staff's answer to environmental question 24(b) (Prefiled Exh. NRC000176, at 6-8), reiterating that AES should consider implementing the mitigation measure of AES coordination with the Idaho Department of Fish and Game to determine corrective action or mitigation for offsite public lands lost to wildlife due to EREF project effects, what is AES's current planned implementation action during operation regarding wildlife protection for offsite lands?**

Response to Question 2 (Kay and Harper):[1]

AES is modifying its previous response to the NRC-recommended mitigation measure. Table 1 from the AES response to Question 5(a) has been revised accordingly and is provided below.

[1] Exhibits AES000100 (Kay Affidavit) and AES000012 (Kay Professional Qualifications); Exhibits AES000101 (Harper Affidavit) and AES000011 (Harper Professional Qualifications).

Table 1 – AES Implementation of NRC Proposed Mitigation Measures

Impact Area	Activity	NRC Proposed Mitigation Measure	AES Implementation
CONSTRUCTION RELATED (from FEIS Table 5-3)			
Air Quality	Point source releases of criteria pollutants	Ensure vehicles and equipment with internal combustion engines are properly tuned and pollution control devices are functional.	Idaho does not have a vehicle emission inspection program in Bonneville County. However, AES and its construction manager will implement the spirit of this mitigation measure as best it can through proper maintenance of construction vehicles, visual observations of equipment and general employee training.
		Install hard-surface pavements, curbs, scupper drains, and drainage ways at fuel dispensing island that will channel spilled fuels to fire-safe containment sumps; require delivery drivers to remain in attendance throughout all fuel deliveries; place spill containment/response equipment at fuel dispensing stations.	Yes
		Provide first responder training to selected workers; ensure storage tanks are equipped with fully functional overflow and vapor control features.	Yes
		Install emergency shut-offs for fuel dispensing pumps; post spill response directives at the fuel dispensing islands; provide spill cleanup materials at the fuel dispensing islands for cleanup of small spills; ensure the fuel dispensing islands have adequate lighting.	Yes
		Adopt a policy that requires prompt cleanup of all spilled materials.	Yes

Impact Area	Activity	NRC Proposed Mitigation Measure	AES Implementation
		Identify and select construction-related products and chemicals that are free of volatile solvents.	Yes, where possible. Alternatives for some solvents used may not be possible.
		Suspend high fugitive dust-generating activities during early morning hours with calm winds and during windy periods.	AES and construction manager will consult with Idaho authorities and utilize their expertise to appropriately address fugitive dust generation.
Geology and Soil	Soil disturbance	Minimize the construction footprint to the extent possible.	Yes
		Cover stockpiles to reduce exposure to wind and rain.	Yes, where practicable and where required.
		Limit routine vehicle traffic to paved or gravel roads.	Yes
Water Resources	Stormwater management	Reduce the size of impervious surfaces (parking lots, roads, and roofs) to the extent possible; implement a "fix-it-first" infrastructure policy to set spending priorities on the repair of existing infrastructure over the installation of new infrastructure; and employ low-impact development strategies and practices during construction activities.	Yes, without causing safety issues. Roofs are not included.
Ecological Resources	Habitat disturbance	Plant disturbed areas and irrigated crop areas with native sagebrush steppe species to establish native communities and prevent the establishment of noxious weeds. Plant immediately following the completion of disturbance activities and the abandonment of crop areas.	Yes, using certified noxious-weed-free seed, and native, low-water-consumptive plant species selected in consultation with the Idaho authorities.

Impact Area	Activity	NRC Proposed Mitigation Measure	AES Implementation
		Develop and implement a noxious weed control program to prevent the establishment and spread of invasive plant species. Hose down tires and undercarriage of off-road vehicles prior to site access to dislodge seeds or other propagules of noxious weeds. Monitor for noxious weeds throughout the construction and operations phases and immediately eradicate new infestations. Minimize indirect impacts of weed control activities, such as herbicide effects on non-target species, and soil disturbance and fire hazards from vehicle operation in undisturbed areas during weed control activities.	Yes.
Noise	Exposure of workers and the public to noise	Suspend the use of explosives during periods when meteorological conditions (*e.g.*, low cloud cover) can be expected to reduce sound attenuation.	Suspension of blasting activities will be based on unacceptable noise levels determined by AES, and its construction manager's site Health & Safety professionals.
OPERATIONS RELATED (from FEIS Table 5-4)			
Water Resources	Stormwater management	Reduce the size of impervious surfaces (parking lots, roads, and roofs) to the extent possible.	Yes, though roofs are not included.
		Implement a "fix-it-first" infrastructure policy to set spending priorities on the repair of existing infrastructure over the installation of new infrastructure.	Yes
		Employ low-impact development strategies and practices during operations.	Yes

Impact Area	Activity	NRC Proposed Mitigation Measure	AES Implementation
Ecological Resources	Wildlife protection	Develop areas that will retain water of suitable quality for wildlife and provide wildlife access to such areas with suitable water quality.	Since there are no wetlands on the site, wildlife will continue to have access to the on-site, intermittent stream drainages that retain water after a rain or snow storm.
		For basins with water quality unsuitable for wildlife, use animal friendly fencing and netting or other suitable material over basins to prevent use by migratory birds.	Since the EREF will not discharge any treated UF_6 process waters to the basins, the need for netting (or other suitable mitigation methods) is not anticipated. However, AES will consult with the appropriate Idaho authorities when basin designs are complete to discuss this issue further. Animal friendly fencing will be utilized around the basins.\
		Place metal reflectors on the top wire of the fence along the AES property boundary, to reduce sage-grouse mortality resulting from collisions with the fence.	Suitable reflectors will be utilized on fencing along the AES property, as appropriate, to reduce sage-grouse mortality resulting from collisions with the fence.
		Coordinate with Idaho National Laboratory in monitoring risks to sage-grouse and other sensitive species and identifying measures to reduce risks and protect these species and their habitat, particularly sagebrush steppe.	Yes
		Coordinate with Idaho Department of Fish and Game to determine corrective action or mitigation for the offsite public lands lost to wildlife due to project effects.	**AES will coordinate with the IDFG regarding this issue.**
Transportation	Traffic volume	Consider working with INL to operate a joint bus system.	Yes

Impact Area	Activity	NRC Proposed Mitigation Measure	AES Implementation
		Establish shift changes outside of INL peak commuting periods.	AES expects its shift staffing to be small in comparison to INL. However, AES will implement this measure if practicable.
Public and Occupational Health	Radiological effects	Store "empty" cylinders with heels in the middle of a storage pad between full tail cylinders to reduce external exposure to workers.	"Empty" cylinders will be stored in accordance with ALARA practices. AES will also consider, as practicable, storing cylinders so as to maximize shielding from nearby cylinders.