



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

September 8, 2011

Ms. Olivia Braun  
Environmental Planner  
Division of Environmental Planning & Habitat Protection  
Bureau of Wildlife Habitat Management  
Pennsylvania Game Commission  
2001 Elmerton Avenue  
Harrisburg, PA 17110-9797

SUBJECT: REQUEST FOR LIST OF PROTECTED SPECIES WITHIN THE AREA UNDER  
EVALUATION FOR THE LIMERICK GENERATING STATION, UNITS 1 AND 2,  
LICENSE RENEWAL APPLICATION REVIEW

Dear Ms. Braun:

The U.S. Nuclear Regulatory Commission (NRC or the staff) is reviewing an application submitted by Exelon Generation Company, LLC (Exelon or the applicant), for the renewal of the operating licenses for Limerick Generating Station, Units 1 and 2 (Limerick). Limerick is located in the Limerick Township of Montgomery County, PA, and is approximately 35 miles upriver of Philadelphia. The application for renewal was submitted in a letter dated June 22, 2011, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 54.

The NRC has established that, as part of the staff's review of any nuclear power plant license renewal application (LRA), a site-specific Supplemental Environmental Impact Statement (SEIS) to its *Generic Environmental Impact Statement for License Renewal of Nuclear Plants*, NUREG-1437, will be prepared under 10 CFR Part 51, the NRC's regulation that implements the National Environmental Policy Act of 1969, as amended. The SEIS includes an analysis of pertinent environmental issues, including endangered or threatened species and impacts to fish and wildlife. This letter is being submitted under the provisions of the Endangered Species Act of 1973, as amended, and the Fish and Wildlife Coordination Act of 1934, as amended.

Limerick is a two-unit site with forced-circulation General Electric boiling-water reactors. The facilities consist of the reactor enclosures, turbine enclosures, cooling towers, electrical substations, independent spent fuel storage installation, Schuylkill River Pump house, and spray pond. Additional facilities are the cooling tower blowdown discharge line and associated structures, which are submerged immediately downriver from the Schuylkill River Pump house.

The Limerick plant site is 645 acres, including 491 acres in Montgomery County and 154 acres in Chester County. The proposed action includes the use and continued maintenance of existing plant facilities and transmission lines. See Enclosures 1 – 5 for figures of the facilities and transmission lines. Exelon states that it has no plans for refurbishment or replacement activities to support renewal of the operating licenses.

As part of the SEIS preparation, the applicable transmission line corridors will be reviewed. The Limerick transmission system is comprised of the transmission lines and associated structures from the three main power transformers of Limerick, Unit 1, to the Limerick 230-kV Substation, and the three main power transformers of Limerick, Unit 2, to the Limerick 500-kV Substation; both substations are located on the plant site. The system also includes the substations, transmission lines, and associated structures to connect Limerick to the regional electricity grid, including:

- two 230-kV lines, designated 220-60 and 220-61, connecting the Limerick 230-kV Substation to the Cromby Substation located at Exelon Generation's Cromby Generating Station;
- one 230-kV line, designated 220-62, connecting the Cromby Substation to the North Wales Substation and the regional electricity grid;
- one 230-kV line connecting the Cromby Substation to the Plymouth Meeting Substation and the regional electricity grid, consisting of:
  - One segment, designated 220-63, connecting the Cromby Substation to the Barbadoes Substation; and
  - One segment, designated 220-64, connecting the Barbadoes Substation to the Plymouth Meeting Substation; and
- one 500-kV line, designated 5031, connecting the Limerick 500-kV Substation to the Whitpain Substation and the regional electricity grid.

Additionally, the transmission system includes the rights of way (ROWs) for the transmission lines. These ROWs were either pre-existing at the time Limerick was built (i.e., the lines are being shared with other linear features that were already in place) or were added in conjunction with construction. The system is basically the same as originally constructed. See Enclosure 5 for an overview of the transmission line ROW routes, which traverse Montgomery County and Chester County.

The four offsite 230-kV lines exclusively serve Limerick, Unit 1, and the one offsite 500-kV line exclusively serves Limerick Unit 2. Exelon states in the LRA, "[e]ven though these lines were constructed solely to serve the Limerick units, it is anticipated that some or all of these lines would continue to be used for transmitting electricity produced by other generating sources even if the Limerick operating licenses are not renewed."

PECO, the energy delivery subsidiary of Exelon Corporation serving retail customers in southeastern Pennsylvania, owns in fee the offsite substations and a portion of the transmission line ROWs associated with the transmission system. A significant portion of the transmission system is located over or under highways, streets, other public places or property owned by others, for which PECO has permits, grants, easements, or licenses.

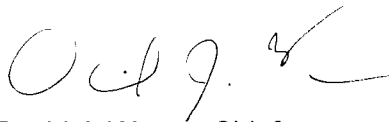
To support the SEIS preparation process and to ensure compliance with Section 7 of the Endangered Species Act, the NRC requests a list of species and information on protected, proposed, and candidate species and critical habitat that may be in the vicinity of Limerick and its associated transmission line ROWs. The applicant corresponded with your office by letters dated January 19 and March 1, 2011. You replied by letter dated March 2, 2011, that there are bird and mammal species or resources of concern located in the vicinity of the project, but since the project will not involve new construction or tree clearing, that no impact to threatened or endangered species is likely.

To avoid any duplication of effort, you may confirm that the previously provided information to Exelon from your office is still current rather than completing a new review. If any information is not current, please provide any applicable updates. Both letters from Exelon and the March 2011 letter from The Pennsylvania Game Commission are enclosed for your reference (enclosures 6, 7, and 8). As you recommended in your letter to Exelon, we will also contact Mr. Bruce Metz, Land Management Supervisor in the Pennsylvania Game Commission office to confirm that there will be no impacts to nearby State Game lands. In addition, please provide any other information you consider appropriate under the provisions of the Fish and Wildlife Coordination Act.

The NRC staff plans to hold two public license renewal overview and environmental scoping meetings on September 22, 2011, in the area of Limerick. The first session will be held in the afternoon and an identical session will be held later that evening. Both sessions will be held at the Sunnybrook Ballroom, 50 North Sunnybrook Road, Pottstown, PA 19464. The afternoon session will be from 2:00 p.m. to 4:00 p.m. and the evening session will be from 7:00 p.m. to 9:00 p.m. In addition, the NRC plans to hold a one hour Open House prior to each meeting to answer public questions. You and your staff are invited to attend the public meetings and Open Houses. Your office will receive a copy of the draft SEIS along with a request for comments. The anticipated publication date for the draft SEIS is August 2012.

The Limerick LRA is available on the internet at <http://www.nrc.gov/reactors/operating/licensing/renewal/applications/limerick.html>. If you have any questions or require additional information, please contact Ms. Lisa Regner, License Renewal Project Manager, by phone at 301-415-1906 or by e-mail at [Lisa.Regner@nrc.gov](mailto:Lisa.Regner@nrc.gov).

Sincerely,



David J. Wrona, Chief  
Projects Branch 2  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

Enclosures:  
As stated

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Sincerely,

/RA/

David J. Wrona, Chief  
Projects Branch 2  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

Enclosures:

As stated

cc w/encls: Listserv

DISTRIBUTION:

See next page

**ADAMS Accession Nos.:**

Package: ML11234A095

Enclosures 1 – 5: ML112300134

Letter: ML11234A065

Enclosures 6 – 8: ML11234A065

\*Concurrence via e-mail

|               |             |             |              |              |
|---------------|-------------|-------------|--------------|--------------|
| <b>OFFICE</b> | LA:DLR/RPB2 | PM:DLR/RPB2 | LA:DLR/RPB2* | BC: DLR/RPB2 |
| <b>NAME</b>   | IKing       | LRegner     | IKing        | DWrona       |
| <b>DATE</b>   | 08/22/2011  | 08/31/2011  | 08/22/2011   | 09/8/2011    |

OFFICIAL RECORD COPY

Letter to Olivia Braun from David J. Wrona dated September 8, 2011

SUBJECT: REQUEST FOR LIST OF PROTECTED SPECIES WITHIN THE AREA UNDER  
EVALUATION FOR THE LIMERICK GENERATING STATION, UNITS 1 AND 2,  
LICENSE RENEWAL APPLICATION REVIEW

DISTRIBUTION:

**HARD COPY:**

L Regner

**E-MAIL:**

PUBLIC

RidsNrrDlr Resource

RidsNrrDlrRpb1 Resource

RidsNrrDlrRpb2 Resource

RidsNrrDlrRerb Resource

RidsNrrDlrRarb Resource

RidsNrrDlrRasb Resouce

DLR\_RPOB Resource

RidsOpaMail

RidsOgcMailCenter

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RKuntz

PBamford

MSmith, OGC

EDiPaolo, RI

NSieller, RI

NMcNamara, RI

DScrenci, RI

NSheehan, RI



0 875 1,750 3,500  
Feet

**Exelon.**

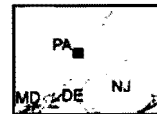
**Legend**

- Exelon Generation Property Boundary
- County Boundary
- Municipal Boundary
- 2500 Ft Radius Exclusion Area
- Conrail Line

Reference  
DVRPC 2005 Aerial Imagery  
ESR's 2006 Streets and Roads

NAD 1983 State Plane Pennsylvania South  
Projection Lambert Conformal Conic  
Linear Unit: Foot US

Total Exelon Generation-owned property  
845 acres



**Figure 2.1-1 LGS Plant Site Boundary**  
**Exelon Generation**  
**Limerick Generating Station**  
Limerick Township, Montgomery County, PA



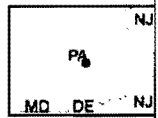
0 75 150 300 Feet

1 inch = 150 feet

**Exelon.**

Reference  
Bing Maps Aerial Imagery  
ESRI 2008 Streets and Roads

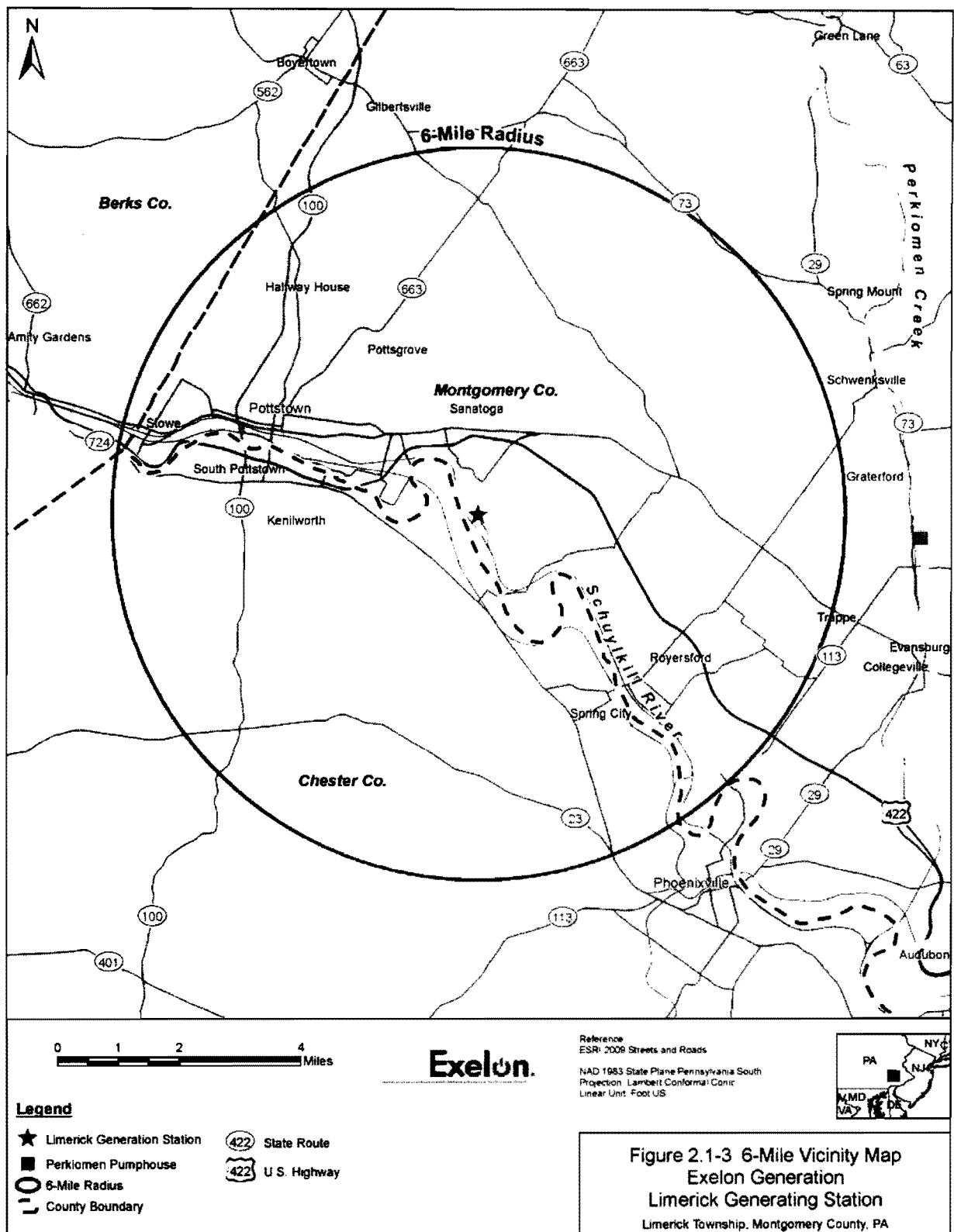
NAD 1983 State Plane Pennsylvania South  
Projection: Lambert Conformal Conic  
Linear Unit: Foot US



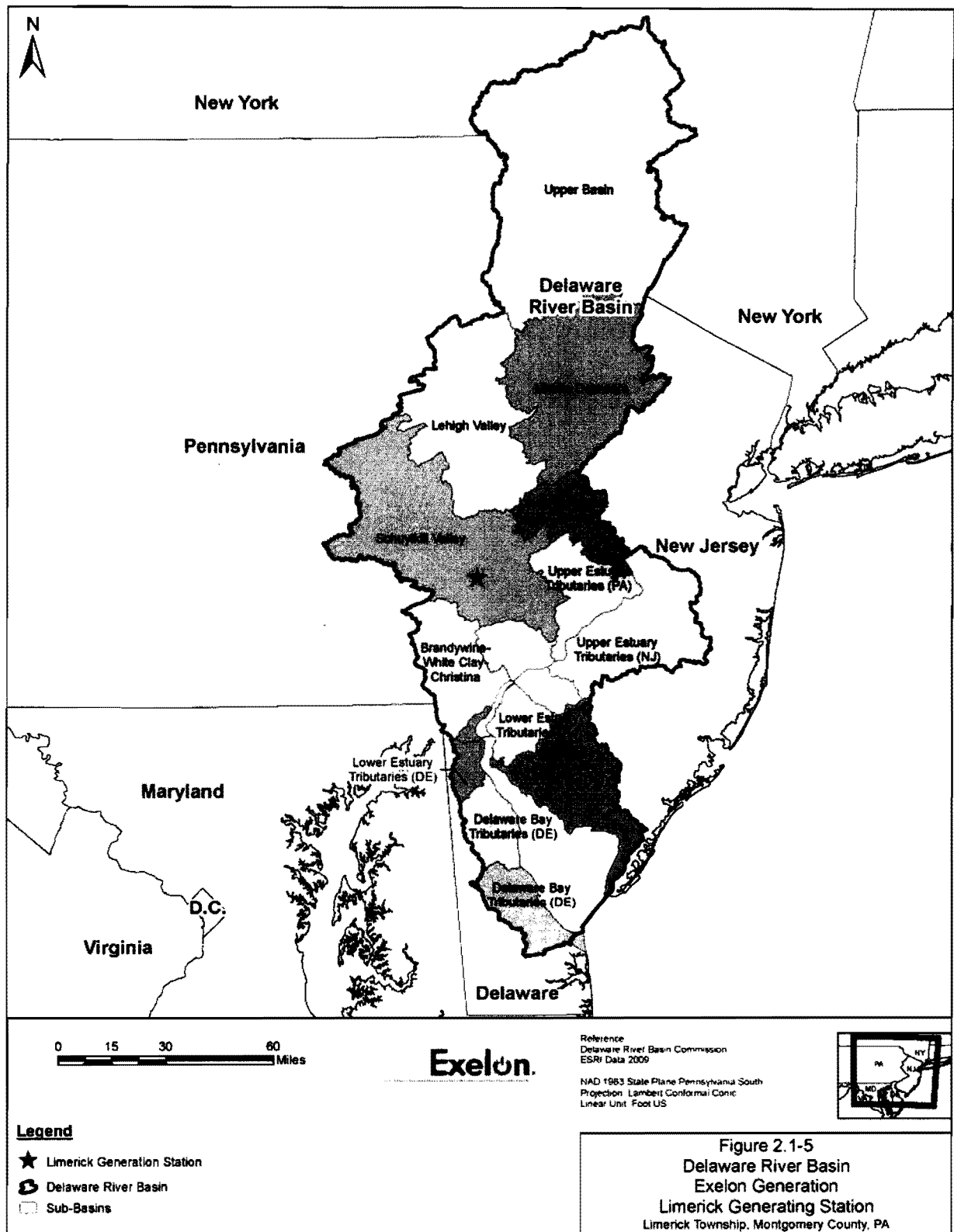
**Legend**

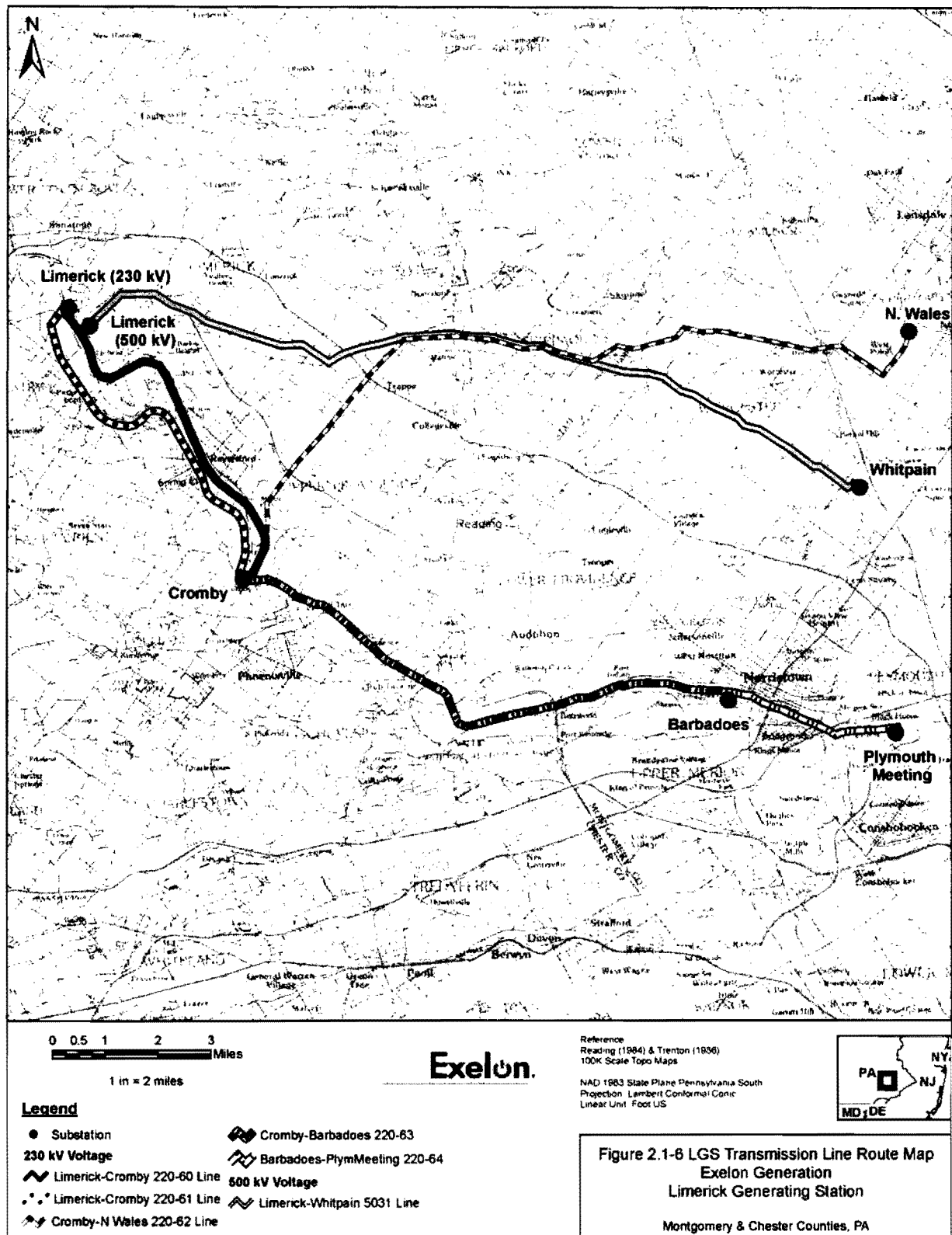
- Cooling Tower Blowdown Line
- Diffuser Pipe
- County Boundary

**Figure 3.1-4 Cooling Tower Blowdown  
Diffuser Location  
Exelon Generation  
Limerick Generating Station  
Limerick Township, Montgomery County, PA**









**Michael P. Gallagher, PE**  
Vice President  
License Renewal Projects

Telephone 610.765.5958  
www.exeloncorp.com  
michaelp.gallagher@exeloncorp.com

Exelon Nuclear  
200 Exelon Way  
KSA/2-F  
Kennett Square, PA 19348

January 19, 2011

Ms. Chris Firestone  
Pennsylvania Department of Conservation & Natural Resources  
Bureau of Forestry - Plant Program  
Forest Advisory Services  
P.O. Box 8552  
Harrisburg, PA 17105-1673

Re: Renewal of Operating Licenses for Limerick Generating Station, Units 1 and 2  
Request for Information on Listed Threatened and Endangered Species

Dear Ms. Firestone:

In mid-2011, Exelon Generation Company, LLC (Exelon Generation; a subsidiary of Exelon Corporation) plans to apply to the U.S. Nuclear Regulatory Commission (NRC) for renewal of the operating licenses for Limerick Generating Station, Units 1 and 2 (LGS). The existing license for Unit 1 will expire on October 26, 2024 and the existing license for Unit 2 will expire on June 22, 2029. The renewal term for each unit would be an additional twenty years beyond the existing license expiration date.

The NRC requires that license renewal applications include environmental reports assessing potential environmental impacts from license renewal activities. One such impact would be effects of license renewal activities on threatened and endangered species that are listed or proposed for listing in accordance with the Endangered Species Act (ESA) (16 USC 1531, et seq.) (10 CFR 51.53(c)(3)(ii)(E)). Accordingly, we are contacting you to obtain input for use in addressing these effects in the LGS license renewal environmental report. Later, NRC may also request an informal consultation with your office consistent with Section 7 of the ESA (16 USC 1536(a)).

### **Project Features**

LGS existing features that are relevant to the effects of license renewal on threatened and endangered species include the following:

1. The LGS plant site, which hosts the two generating units, is located on Exelon Generation-owned properties that are mostly situated in Limerick Township, Montgomery County, but some of which are in the adjacent Lower Pottsgrove Township, Montgomery County or directly across the Schuylkill River in East Coventry Township, Chester County.
2. The LGS makeup water supply system, which conveys water from approved sources to LGS for use in its circulating water system, is composed of the following components:
  - The Perkiomen Pumphouse, located in Graterford Township, Montgomery County, and an associated underground 7.6-mile long Perkiomen Pumphouse-to-LGS pipeline; both are located along an easement held by Exelon Generation within an electrical transmission line right-of-way (ROW) controlled by PECO, a subsidiary of Exelon Corporation;
  - The Bradshaw Reservoir and Bradshaw Pumphouse, which are both situated in Plumstead Township, Bucks County, on Exelon Generation-owned properties totaling 42 acres;
  - The Bedminster Water Processing Facility, which is situated in Bedminster Township, Bucks County, on a 3-acre Exelon Generation-owned property; and
  - An underground water transmission main, which is routed within a natural gas pipeline ROW along an easement held by Exelon Generation that runs from the Bradshaw Pumphouse to the East Branch Perkiomen Creek by way of the Bedminster Facility.

The buried Perkiomen Pumphouse-to-LGS water pipeline and the underground water transmission main are located below ground within ROWs that exist for other purposes, and their operation requires no independent vegetation management or ground disturbing activities along these ROWs. Hence, these underground components of the makeup water supply system are assumed to have no effects on threatened and endangered plant species.

3. The LGS transmission system is composed of the following components:
  - Two electrical transmission lines constructed to connect the LGS main power transformers with two onsite electrical substations (these components are located on the LGS plant site); and
  - Four 230-kiloVolt (kV) and one 500-kV electrical transmission lines, with associated structures and offsite electrical substations, constructed to connect the onsite electrical substations to the regional electricity grid.

All offsite substations and transmission lines are operated by PECO and are located in ROWs situated in Montgomery and Chester Counties either on PECO-owned properties or on properties for which PECO holds permits, grants, easements, or licenses. Onsite transmission lines traverse only land that was disturbed during initial station construction.

Figures 1 through 9 showing the locations of the existing LGS project features are provided in Attachment 3.

### **Activities During the License Renewal Terms**

LGS license renewal will involve no new construction, refurbishment, ground disturbing activities, changes to operations, or changes to existing land-use conditions. Operation and maintenance activities during the terms of the renewed LGS licenses are only expected to occur in previously disturbed areas or existing ROWs. Hence, no new adverse impacts to threatened and endangered plant species are anticipated from license renewal.

### **Identification of Threatened and Endangered Species Resources**

Using the Pennsylvania Natural Diversity Inventory (PNDI) Environmental Review Tool, a web-based application sponsored by the Pennsylvania Natural Heritage Program (PNHP), Exelon Generation has reviewed the potential for the LGS plant site area and the properties associated with the LGS makeup water supply system to adversely affect known occurrences of species or natural communities of concern. Receipts for PNDI search #s 20100421240174 (LGS plant site), 20100421240163 (Perkiomen Pumphouse area), 20100406237563 (Bradshaw Reservoir and Pumphouse area), and 20100407237630 (Bedminster Water Processing Facility area) are attached (Attachment 1). One "Special Concern Species" was identified for the LGS plant site: tooth-cup (*Rotala ramosior*). The responses for the other project sites stated that no impact is anticipated to threatened and endangered species and/or special concern species or resources.

Given the sizable acreage and distances associated with the LGS transmission line corridors, no PNDI searches were conducted for this project component. For review by your office in identifying species of concern, we instead offer the figures in Attachment 3 showing the routes and widths of the corridors.

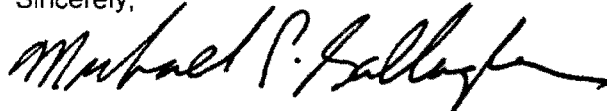
A review of the PNHP web site for state-listed endangered and threatened species indicates that numerous state-listed plant species could occur in Montgomery, Chester, and Bucks Counties. The enclosed Attachment 2 contains a list of these species. One perennial orchid species, the small whorled pogonia (*Isotria medeoloides*), state-listed as endangered, with Chester County as its recorded location, also is federally-listed as threatened. Although the American Holly (*Ilex opaca*), which is state-listed as threatened, was observed on the LGS plant site in 1978, Exelon Generation is not aware of the recent presence of any state-listed plant species on or near the properties associated with LGS and its associated transmission lines. Also, Exelon Generation and PECO adhere to regulatory requirements regarding sensitive areas that could contain state-listed threatened and endangered plant species and work closely with your department to protect these resources.

Because license renewal involves no new construction, refurbishment, ground disturbing activities, changes to operation, or changes to existing land use conditions, Exelon Generation does not expect LGS license renewal to adversely affect threatened and endangered plant species located near the LGS plant site, makeup water supply system, or transmission system ROWs. Nevertheless, we are requesting your help to identify issues we may have overlooked that need to be addressed in the LGS license renewal environmental report. We are also interested in learning of any information your staff believes could help expedite the NRC's review of the LGS license renewal application. Hence, in closing, we would appreciate receiving a response from you detailing such issues and information for the LGS plant site, makeup water supply system and transmission system. We would also welcome your confirmation of our conclusion that LGS license renewal would not adversely affect threatened and endangered plant species.

Because we plan to incorporate a copy of your response, as well as this letter, into the LGS license renewal environmental report that will be submitted to the NRC as part of the LGS license renewal application, your response will be most helpful if we receive it by March 10, 2011.

Please call Nancy Ranek (610-765-5369), our License Renewal Environmental Lead, if there are questions or you require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael P. Gallagher". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael P. Gallagher

Enclosures:

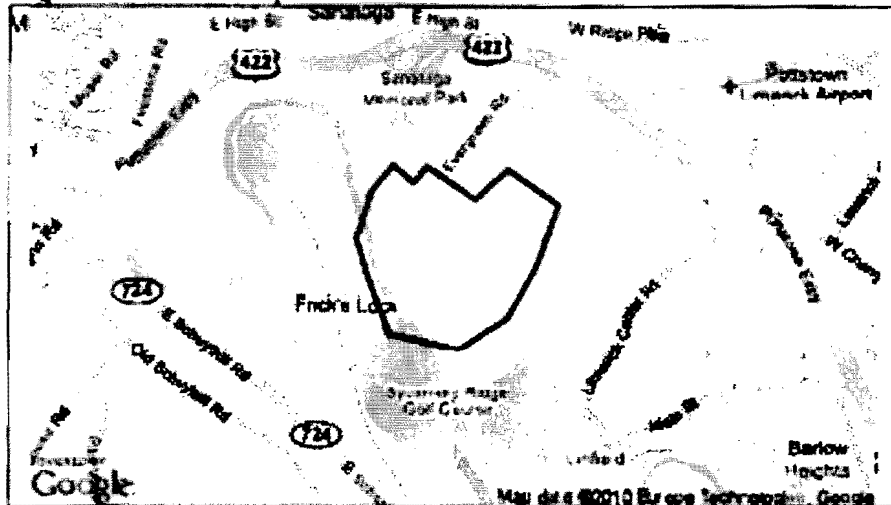
- Attachment 1: Receipts for PNDI Search #s 20100421240174, 20100421240163, 20100406237563, and 20100407237630
- Attachment 2: Threatened and Endangered Plant Species that could occur in Montgomery, Chester, and Bucks Counties
- Attachment 3: Figures Depicting LGS Project Features (Figures 1 through 9)

**ATTACHMENT 1**

**Receipts for PNDI Searches**

|   |           |
|---|-----------|
| <u>Receipt for PNDI Search # 20100421240174, Limerick GS .....</u>        | <u>2</u>  |
| <u>Receipt for PNDI Search # 20100421240163, Perkiomen Pumphouse.....</u> | <u>7</u>  |
| <u>Receipt for PNDI Search # 20100406237563, Bradshaw pump .....</u>      | <u>11</u> |
| <u>Receipt for PNDI Search # 20100407237630, Bedminster WPF.....</u>      | <u>16</u> |

Project Name: Limerick G5  
Date of review: 4/21/2010 4:33:48 PM  
Project Category: Energy Storage, Production, and Transfer, Energy Production (generation), Nuclear Power Plant – maintenance, modification, or expansion  
Project Area: 483.8 acres  
County: Chester, Montgomery Township/Municipality: East Coventry, Limerick, Lower Pottsgrove  
Quadrangle Name: PHOENIXVILLE – ZIP Code: 19465, 19464  
Decimal Degrees: 40.224106 N, -75.550656 W  
Degrees M



| Agency  | Results          | Response  |
|---|------------------|---|
| PA Game Commission                                  | No Known Impact  | No Further Review Required                      |
| PA Department of Conservation and Natural Resources | Potential Impact | FURTHER REVIEW IS REQUIRED, See Agency Response |
| PA Fish and Boat Commission                         | Potential Impact | FURTHER REVIEW IS REQUIRED, See Agency Response |
| U.S. Fish and Wildlife Service                      | No Known Impact  | No Further Review Required                      |

Page 1 of 5



PNDI Project Environmental Review Receipt      Project Search ID: 20100421240174

Note that regardless of PNDI search results, projects requiring a Chapter 105 DEP individual permit or GP 5, 6, 7, 8, 9 or 11 in certain counties (Adams, Berks, Bucks, Carbon, Chester, Cumberland, Delaware, Lancaster, Lebanon, Lehigh, Monroe, Montgomery, Northampton, Schuylkill and York) must comply with the bog turtle habitat screening requirements of the PASPGP.

### RESPONSE TO QUESTION(S) ASKED

Q1: "Will the entire project (including any discharge) occur in or on an existing building, parking lot, driveway, road, road shoulder, street, runway, paved area, railroad bed, maintained (periodically mown) lawn, crop agriculture field or maintained orchard?"

Your answer is: 3. Unknown

Q2: Accurately describe what is known about wetland presence in the project area or on the land parcel. "Project" includes all features of the project (including buildings, roads, utility lines, outfall and intake structures, wells, stormwater retention/detention basins, parking lots, driveways, lawns, etc.), as well as all associated impacts (e.g., temporary staging areas, work areas, temporary road crossings, areas subject to grading or clearing, etc.). Include all areas that will be permanently or temporarily affected – either directly or indirectly – by any type of disturbance (e.g., land clearing, grading, tree removal, flooding, etc.). Land parcel = the lot(s) on which some type of project(s) or activity(s) are proposed to occur.

Your answer is: 2. The project area (or land parcel) has not been investigated by someone qualified to identify and delineate wetlands, or it is currently unknown if the project or project activities will affect wetlands.

Q3: Aquatic habitat (stream, river, lake, pond, etc.) is located on or adjacent to the subject property and project activities (including discharge) may occur within 300 feet of these habitats

Your answer is: 1. Yes

### 3. AGENCY COMMENTS

Regardless of whether a DEP permit is necessary for this proposed project, any potential impacts to threatened and endangered species and/or special concern species and resources must be resolved with the appropriate jurisdictional agency. In some cases, a permit or authorization from the jurisdictional agency may be needed if adverse impacts to these species and habitats cannot be avoided.

These agency determinations and responses are valid for one year (from the date of the review), and are based on the project information that was provided, including the exact project location; the project type, description, and features; and any responses to questions that were generated during this search. If any of the following change: 1) project location, 2) project size or configuration, 3) project type, or 4) responses to the questions that were asked during the online review, the results of this review are not valid, and the review must be searched again via the PNDI Environmental Review Tool and resubmitted to the jurisdictional agencies. The PNDI tool is a primary screening tool, and a desktop review may reveal more or fewer impacts than what is listed on this PNDI receipt

### PA Game Commission

**RESPONSE:** No impact is anticipated to threatened and endangered species and/or special concern species and resources.

### PA Department of Conservation and Natural Resources

**PNDI Project Environmental Review Receipt**

**Project Search ID: 20100421240174**

**DCNR Species:**

**Scientific Name:** *Rotala ramosior*

**Common Name:** Tooth cup

**Current Status:** Special Concern Species\*

**Proposed Status:** Special Concern Species\*

**RESPONSE:** Further review of this project is necessary to resolve the potential impacts(s). Please send project information to this agency for review (see WHAT TO SEND).

**PA Fish and Boat Commission**

**PFBC Species:**

**Scientific Name:** Sensitive Species\*\*

**Common Name:**

**Current Status:** Threatened

**Proposed Status:** Special Concern Species\*

**Scientific Name:** *Stygobromus pizzinii*

**Common Name:** Pizzini's Cave Amphipod

**Current Status:** Special Concern Species\*

**Proposed Status:** Special Concern Species\*

**RESPONSE:** Further review of this project is necessary to resolve the potential impacts(s). Please send project information to this agency for review (see WHAT TO SEND).

**U.S. Fish and Wildlife Service**

**RESPONSE:** No impacts to federally listed or proposed species are anticipated. Therefore, no further consultation/coordination under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq. is required. Because no take of federally listed species is anticipated, none is authorized. This response does not reflect potential Fish and Wildlife Service concerns under the Fish and Wildlife Coordination Act or other authorities.

\* Special Concern Species or Resource - Plant or animal species classified as rare, tentatively undetermined or candidate as well as other taxa of conservation concern, significant natural communities, special concern populations (plants or animals) and unique geologic features.

\*\* Sensitive Species - Species identified by the jurisdictional agency as collectible, having economic value, or being susceptible to decline as a result of visitation.

**WHAT TO SEND TO JURISDICTIONAL AGENCIES**

If project information was requested by one or more of the agencies above, send the following information to the agency(s) seeking this information (see AGENCY CONTACT INFORMATION).

**PNDI Project Environmental Review Receipt**

**Project Search ID: 20100421240174**

**Check-List of Minimum Materials to be submitted:**

- \_\_\_\_ **SIGNED** copy of this Project Environmental Review Receipt
- \_\_\_\_ Project narrative with a description of the overall project, the work to be performed, current physical characteristics of the site and acreage to be impacted.
- \_\_\_\_ Project location information (name of USGS Quadrangle, Township/Municipality, and County)
- \_\_\_\_ USGS 7.5-minute Quadrangle with project boundary clearly indicated, and quad name on the map

The inclusion of the following information may expedite the review process.

- \_\_\_\_ A basic site plan (particularly showing the relationship of the project to the physical features such as wetlands, streams, ponds, rock outcrops, etc.)
- \_\_\_\_ Color photos keyed to the basic site plan (i.e. showing on the site plan where and in what direction each photo was taken and the date of the photos)
- \_\_\_\_ Information about the presence and location of wetlands in the project area, and how this was determined (e.g., by a qualified wetlands biologist); if wetlands are present in the project area, provide project plans showing the location of all project features, as well as wetlands and streams
- \_\_\_\_ The DEP permit(s) required for this project

## **4. DEP INFORMATION**

The Pa Department of Environmental Protection (DEP) requires that a signed copy of this receipt, along with any required documentation from jurisdictional agencies concerning resolution of potential impacts, be submitted with applications for permits requiring PNDI review. For cases where a "Potential Impact" to threatened and endangered species has been identified before the application has been submitted to DEP, the application should not be submitted until the impact has been resolved. For cases where "Potential Impact" to special concern species and resources has been identified before the application has been submitted, the application should be submitted to DEP along with the PNDI receipt, a completed PNDI form and a USGS 7.5 minute quadrangle map with the project boundaries delineated on the map. The PNDI Receipt should also be submitted to the appropriate agency according to directions on the PNDI Receipt. DEP and the jurisdictional agency will work together to resolve the potential impact(s). See the DEP PNDI policy at <http://www.naturalheritage.state.pa.us>

PNDI Project Environmental Review Receipt      Project Search ID: 20100421240174

## 5. ADDITIONAL INFORMATION

The PNDI environmental review website is a preliminary screening tool. There are often delays in updating species status classifications. Because the proposed status represents the best available information regarding the conservation status of the species, state jurisdictional agency staff give the proposed statuses at least the same consideration as the current legal status. If surveys or further information reveal that a threatened and endangered and/or special concern species and resources exist in your project area, contact the appropriate jurisdictional agency/agencies immediately to identify and resolve any impacts.

For a list of species known to occur in the county where your project is located, please see the species lists by county found on the PA Natural Heritage Program (PNHP) home page ([www.naturalheritage.state.pa.us](http://www.naturalheritage.state.pa.us)). Also note that the PNDI Environmental Review Tool only contains information about species occurrences that have actually been reported to the PNHP.

## 6. AGENCY CONTACT INFORMATION

### PA Department of Conservation and Natural Resources

Bureau of Forestry, Ecological Services Section  
400 Market Street, PO Box 8552, Harrisburg, PA  
17105-8552  
Fax: (717) 772-0271

### U.S. Fish and Wildlife Service

Endangered Species Section  
315 South Allen Street, Suite 322, State College, PA  
16801-4851  
NO Faxes Please.

### PA Fish and Boat Commission

Division of Environmental Services  
450 Robinson Lane, Bellefonte, PA. 16823-7437  
NO Faxes Please

### PA Game Commission

Bureau of Wildlife Habitat Management  
Division of Environmental Planning and Habitat Protection  
2001 Elmerton Avenue, Harrisburg, PA. 17110-9797  
Fax: (717) 787-6957

## 7. PROJECT CONTACT INFORMATION

Name: Cheryl Marks Ecologist  
Company/Business Name: URS Corporation  
Address: 355 Commerce Dr. Suite 300  
City, State, Zip: Ft. Washington PA 19034  
Phone: (215) 367-2598 Fax: (215) 367-1000  
Email: cheryl.marks@urscorp.com

## 8. CERTIFICATION

I certify that ALL of the project information contained in this receipt (including project location, project size/configuration, project type, answers to questions) is true, accurate and complete. In addition, if the project type, location, size or configuration changes, or if the answers to any questions that were asked during this online review change, I agree to re-do the online environmental review.

 4/21/10  
applicant/project proponent signature      date

PNDI Project Environmental Review Receipt

Project Search ID: 20100421240163

## 1. PROJECT INFORMATION

Project Name: **Perkiomen Pumphouse**

Date of review: **4/21/2010 4:16:12 PM**

Project Category: **Energy Storage, Production, and Transfer, Energy Production (generation), Nuclear Power Plant – maintenance, modification, or expansion**

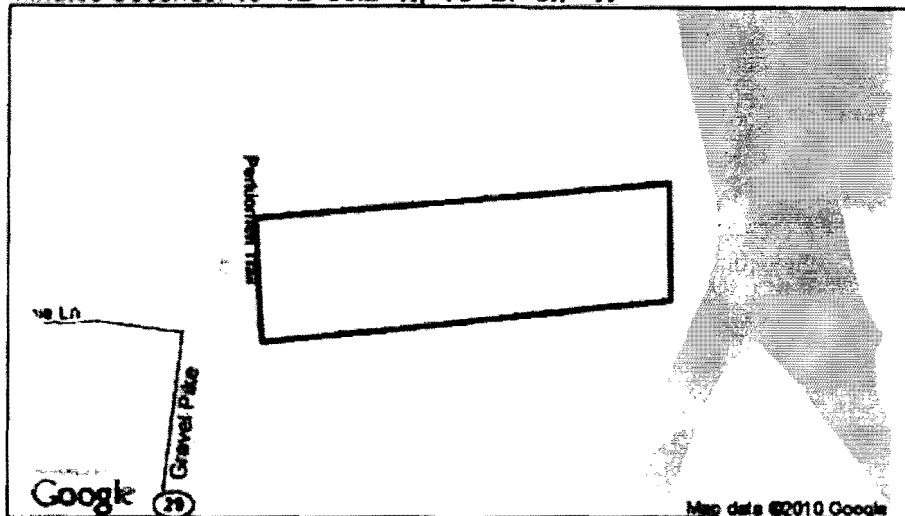
Project Area: **3.5 acres**

County: **Montgomery Township/Municipality: Perkiomen**

Quadrangle Name: **COLLEGEVILLE ~ ZIP Code: 19426**

Decimal Degrees: **40.215611 N, -75.451022 W**

Degrees Minutes Seconds: **40° 12' 56.2" N, -75° 27' 3.7" W**



## 2. SEARCH RESULTS

| Agency  | Results         | Response                   |
|---|-----------------|----------------------------|
| PA Game Commission                                  | No Known Impact | No Further Review Required |
| PA Department of Conservation and Natural Resources | No Known Impact | No Further Review Required |
| PA Fish and Boat Commission                         | No Known Impact | No Further Review Required |
| U.S. Fish and Wildlife Service                      | No Known Impact | No Further Review Required |

As summarized above, Pennsylvania Natural Diversity Inventory (PNDI) records indicate no known impacts to threatened and endangered species and/or special concern species and resources within the project area. Therefore, based on the information you provided, no further coordination is required with the jurisdictional agencies. This response does not reflect potential agency concerns regarding impacts to other ecological resources, such as wetlands.

PNDI Project Environmental Review Receipt      Project Search ID: 20100421240163

Note that regardless of PNDI search results, projects requiring a Chapter 105 DEP individual permit or GP 5, 6, 7, 8, 9 or 11 in certain counties (Adams, Berks, Bucks, Carbon, Chester, Cumberland, Delaware, Lancaster, Lebanon, Lehigh, Monroe, Montgomery, Northampton, Schuylkill and York) must comply with the bog turtle habitat screening requirements of the PASPGP.

### 3. AGENCY COMMENTS

Regardless of whether a DEP permit is necessary for this proposed project, any potential impacts to threatened and endangered species and/or special concern species and resources must be resolved with the appropriate jurisdictional agency. In some cases, a permit or authorization from the jurisdictional agency may be needed if adverse impacts to these species and habitats cannot be avoided.

These agency determinations and responses are valid for one year (from the date of the review), and are based on the project information that was provided, including the exact project location; the project type, description, and features; and any responses to questions that were generated during this search. If any of the following change: 1) project location, 2) project size or configuration, 3) project type, or 4) responses to the questions that were asked during the online review, the results of this review are not valid, and the review must be searched again via the PNDI Environmental Review Tool and resubmitted to the jurisdictional agencies. The PNDI tool is a primary screening tool, and a desktop review may reveal more or fewer impacts than what is listed on this PNDI receipt.

#### PA Game Commission

**RESPONSE:** No impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### PA Department of Conservation and Natural Resources

**RESPONSE:** No impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### PA Fish and Boat Commission

**RESPONSE:** No impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### U.S. Fish and Wildlife Service

**RESPONSE:** No impacts to federally listed or proposed species are anticipated. Therefore, no further consultation/coordination under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*) is required. Because no take of federally listed species is anticipated, none is authorized. This response does not reflect potential Fish and Wildlife Service concerns under the Fish and Wildlife Coordination Act or other authorities.

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PNDI Project Environmental Review Receipt      Project Search ID: 20100421240163

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PNDI Project Environmental Review Receipt

Project Search ID: 20100421240163

## 5. ADDITIONAL INFORMATION

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For a list of species known to occur in the county where your project is located, please see the species lists by county found on the PA Natural Heritage Program (PNHP) home page ([www.naturalheritage.state.pa.us](http://www.naturalheritage.state.pa.us)). Also note that the PNDI Environmental Review Tool only contains information about species occurrences that have actually been reported to the PNHP.

## 6. AGENCY CONTACT INFORMATION

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Bureau of Forestry, Ecological Services Section  
400 Market Street, PO Box 8552, Harrisburg, PA.  
17105-8552  
Fax: (717) 772-0271

### U.S. Fish and Wildlife Service

Endangered Species Section  
315 South Allen Street, Suite 322, State College, PA.  
16801-4851  
NO Faxes Please.

### PA Fish and Boat Commission

Division of Environmental Services  
450 Robinson Lane, Bellefonte, PA. 16823-7437  
NO Faxes Please

### PA Game Commission

Bureau of Wildlife Habitat Management  
Division of Environmental Planning and Habitat Protection  
2001 Elmerton Avenue, Harrisburg, PA. 17110-9797  
Fax: (717) 787-6957

## 7. PROJECT CONTACT INFORMATION

Name: Cheryl Marks, Ecologist  
Company/Business Name: URS Corporation  
Address: 335 Commerce Dr Suite 300  
City, State, Zip: Ft. Washington PA 19034  
Phone: (215) 327-2598 Fax: (215) 327-1000  
Email: cheryl-marks@urscorp.com

## 8. CERTIFICATION

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[Signature] 4/24/10  
applicant/project proponent signature date



PNDI Project Environmental Review Receipt

Project Search ID: 20100406237563

## 1. PROJECT INFORMATION

Project Name: Bradshaw\_pump

Date of review: 4/6/2010 3:53:37 PM

Project Category: Energy Storage, Production, and Transfer, Energy Production (generation), Nuclear Power Plant -- maintenance, modification, or expansion

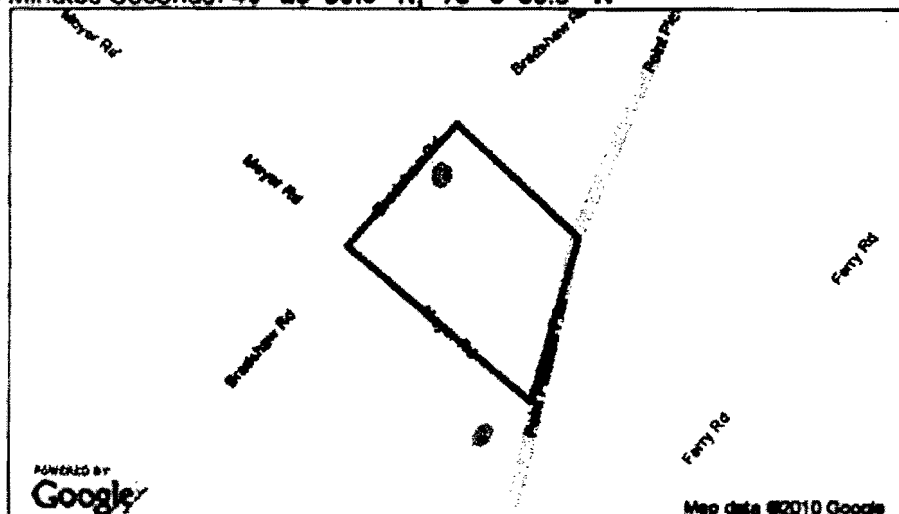
Project Area: 36.5 acres

County: Bucks Township/Municipality: Plumstead

Quadrangle Name: LUMBERVILLE ~ ZIP Code: 18947, 18901

Decimal Degrees: 40.397483 N, -75.093140 W

Degrees Minutes Seconds: 40° 23' 50.9" N, -75° 5' 35.3" W



## 2. SEARCH RESULTS

| Agency  | Results          | Response  |
|---|------------------|---|
| PA Game Commission                                  | No Known Impact  | No Further Review Required                      |
| PA Department of Conservation and Natural Resources | No Known Impact  | No Further Review Required                      |
| PA Fish and Boat Commission                         | Potential Impact | FURTHER REVIEW IS REQUIRED, See Agency Response |
| U.S. Fish and Wildlife Service                      | No Known Impact  | No Further Review Required                      |

As summarized above, Pennsylvania Natural Diversity Inventory (PNDI) records indicate there may be potential impacts to threatened and endangered and/or special concern species and resources within the project area. If the response above indicates "No Further Review Required" no additional communication with the respective agency is required. If the response is "Further Review Required" or "See Agency Response," refer to the appropriate agency comments below. Please see the DEP Information Section of this receipt if a PA Department of Environmental Protection Permit is required.

PNDI Project Environmental Review Receipt

Project Search ID: 20100406237563

Note that regardless of PNDI search results, projects requiring a Chapter 105 DEP individual permit or GP 5, 6, 7, 8, 9 or 11 in certain counties (Adams, Berks, Bucks, Carbon, Chester, Cumberland, Delaware, Lancaster, Lebanon, Lehigh, Monroe, Montgomery, Northampton, Schuylkill and York) must comply with the bog turtle habitat screening requirements of the PASPGP.

## RESPONSE TO QUESTION(S) ASKED

**Q1:** Accurately describe what is known about wetland presence in the project area or on the land parcel.

"Project" includes all features of the project (including buildings, roads, utility lines, outfall and intake structures, wells, stormwater retention/detention basins, parking lots, driveways, lawns, etc.), as well as all associated impacts (e.g., temporary staging areas, work areas, temporary road crossings, areas subject to grading or clearing, etc.). Include all areas that will be permanently or temporarily affected -- either directly or indirectly -- by any type of disturbance (e.g., land clearing, grading, tree removal, flooding, etc.). Land parcel = the lot(s) on which some type of project(s) or activity(s) are proposed to occur.

Your answer is: **2. The project area (or land parcel) has not been investigated by someone qualified to identify and delineate wetlands, or it is currently unknown if the project or project activities will affect wetlands.**

**Q2:** Aquatic habitat (stream, river, lake, pond, etc.) is located on or adjacent to the subject property and project activities (including discharge) may occur within 300 feet of these habitats

Your answer is: **3. Unknown**

## 3. AGENCY COMMENTS

Regardless of whether a DEP permit is necessary for this proposed project, any potential impacts to threatened and endangered species and/or special concern species and resources must be resolved with the appropriate jurisdictional agency. In some cases, a permit or authorization from the jurisdictional agency may be needed if adverse impacts to these species and habitats cannot be avoided.

These agency determinations and responses are valid for one year (from the date of the review), and are based on the project information that was provided, including the exact project location; the project type, description, and features; and any responses to questions that were generated during this search. If any of the following change: 1) project location, 2) project size or configuration, 3) project type, or 4) responses to the questions that were asked during the online review, the results of this review are not valid, and the review must be searched again via the PNDI Environmental Review Tool and resubmitted to the jurisdictional agencies. The PNDI tool is a primary screening tool, and a desktop review may reveal more or fewer impacts than what is listed on this PNDI receipt.

### PA Game Commission

**RESPONSE:** No impact is anticipated to threatened and endangered species and/or special concern species and resources.

### PA Department of Conservation and Natural Resources

**RESPONSE:** No impact is anticipated to threatened and endangered species and/or special concern species and resources.

### PA Fish and Boat Commission

PNDI Project Environmental Review Receipt

Project Search ID: 20100406237563

**PFBC Species:**

**Scientific Name:** Sensitive Species\*\*

**Common Name:**

**Current Status:** Threatened

**Proposed Status:** Special Concern Species\*

**RESPONSE:** Further review of this project is necessary to resolve the potential impacts(s). Please send project information to this agency for review (see WHAT TO SEND).

**U.S. Fish and Wildlife Service**

**RESPONSE:** No impacts to ~~federally~~ listed or proposed species are anticipated. Therefore, no further consultation/coordination under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*) is required. Because no take of federally listed species is anticipated, none is authorized. This response does not reflect potential Fish and Wildlife Service concerns under the Fish and Wildlife Coordination Act or other authorities.

\* Special Concern Species or Resource - Plant or animal species classified as rare, tentatively undetermined or candidate as well as other taxa of conservation concern, significant natural communities, special concern populations (plants or animals) and unique geologic features.

\*\* Sensitive Species - Species identified by the jurisdictional agency as collectible, having economic value, or being susceptible to decline as a result of visitation.

**WHAT TO SEND TO JURISDICTIONAL AGENCIES**

If project information was requested by one or more of the agencies above, send the following information to the agency(s) seeking this information (see AGENCY CONTACT INFORMATION).

**Check-list of Minimum Materials to be submitted:**

- ☐ **SIGNED** copy of this Project Environmental Review Receipt
- ☐ Project narrative with a description of the overall project, the work to be performed, current physical characteristics of the site and acreage to be impacted.
- ☐ Project location information (name of USGS Quadrangle, Township/Municipality, and County)
- ☐ USGS 7.5-minute Quadrangle with project boundary clearly indicated, and quad name on the map

**The inclusion of the following information may expedite the review process.**

- ☐ A basic site plan (particularly showing the relationship of the project to the physical features such as wetlands, streams, ponds, rock outcrops, etc.)
- ☐ Color photos keyed to the basic site plan (i.e. showing on the site plan where and in what direction each photo was taken and the date of the photos)
- ☐ Information about the presence and location of wetlands in the project area, and how this was determined (e.g., by a qualified wetlands biologist), if wetlands are present in the project area, provide project plans showing the location of all project features, as well as wetlands and streams
- ☐ The DEP permit(s) required for this project

PNDI Project Environmental Review Receipt      Project Search ID: 20100406237563

#### **4. DEP INFORMATION**

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PNDI Project Environmental Review Receipt

Project Search ID: 20100406237563

## 5. ADDITIONAL INFORMATION

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## 6. AGENCY CONTACT INFORMATION

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Bureau of Forestry, Ecological Services Section  
400 Market Street, PO Box 8552, Harrisburg, PA.  
17105-8552  
Fax: (717) 772-0271

**U.S. Fish and Wildlife Service**  
Endangered Species Section  
315 South Allen Street, Suite 322, State College, PA.  
16801-4851  
NO Faxes Please.

**PA Fish and Boat Commission**  
Division of Environmental Services  
450 Robinson Lane, Bellefonte, PA. 16823-7437  
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**PA Game Commission**  
Bureau of Wildlife Habitat Management  
Division of Environmental Planning and Habitat Protection  
2001 Elmerton Avenue, Harrisburg, PA. 17110-9797  
Fax: (717) 787-6957

## 7. PROJECT CONTACT INFORMATION

Name: Cheryl Marks, Ecologist  
Company/Business Name: URS Corporation  
Address: 335 Commerce Dr Suite 300  
City, State, Zip: Ft. Washington, PA 19034  
Phone: (215) 367-2598 Fax: (215) 367-1000  
Email: cheryl.marks@urscorp.com

## 8. CERTIFICATION

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Cheryl Marks 4/21/10  
applicant/project proponent signature date

PNDI Project Environmental Review Receipt

Project Search ID: 20100407237630

## 1. PROJECT INFORMATION

Project Name: **Bedminster\_WPF**

Date of review: **4/7/2010 10:02:31 AM**

Project Category: **Energy Storage, Production, and Transfer, Energy Production (generation), Nuclear Power Plant – maintenance, modification, or expansion**

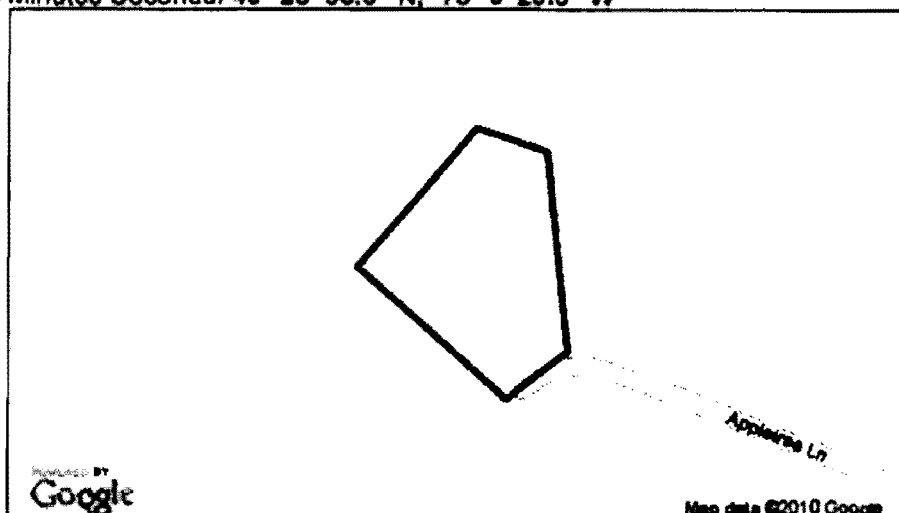
Project Area: **2.4 acres**

County: **Bucks Township/Municipality: Bedminster**

Quadrangle Name: **BEDMINSTER ~ ZIP Code: 18947**

Decimal Degrees: **40.399023 N, -75.158205 W**

Degrees Minutes Seconds: **40° 23' 56.5" N, -75° 9' 29.5" W**



## 2. SEARCH RESULTS

| Agency  | Results         | Response                   |
|---|-----------------|----------------------------|
| PA Game Commission                                  | No Known Impact | No Further Review Required |
| PA Department of Conservation and Natural Resources | No Known Impact | No Further Review Required |
| PA Fish and Boat Commission                         | No Known Impact | No Further Review Required |
| U.S. Fish and Wildlife Service                      | No Known Impact | No Further Review Required |

As summarized above, Pennsylvania Natural Diversity Inventory (PNDI) records indicate no known impacts to threatened and endangered species and/or special concern species and resources within the project area. Therefore, based on the information you provided, no further coordination is required with the jurisdictional agencies. This response does not reflect potential agency concerns regarding impacts to other ecological resources, such as wetlands.

PNDI Project Environmental Review Receipt

Project Search ID: 20100407237630

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### 3. AGENCY COMMENTS

Regardless of whether a DEP permit is necessary for this proposed project, any potential impacts to threatened and endangered species and/or special concern species and resources must be resolved with the appropriate jurisdictional agency. In some cases, a permit or authorization from the jurisdictional agency may be needed if adverse impacts to these species and habitats cannot be avoided.

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#### PA Game Commission

**RESPONSE:** No impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### PA Department of Conservation and Natural Resources

**RESPONSE:** No impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### PA Fish and Boat Commission

**RESPONSE:** No impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### U.S. Fish and Wildlife Service

**RESPONSE:** No impacts to federally listed or proposed species are anticipated. Therefore, no further consultation/coordination under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*) is required. Because no take of federally listed species is anticipated, none is authorized. This response does not reflect potential Fish and Wildlife Service concerns under the Fish and Wildlife Coordination Act or other authorities.

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PNDI Project Environmental Review Receipt

Project Search ID: 20100407237630

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PNDI Project Environmental Review Receipt

Project Search ID: 20100407237630

## 5. ADDITIONAL INFORMATION

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### PA Game Commission

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Division of Environmental Planning and Habitat Protection  
2001 Elmerton Avenue, Harrisburg, PA. 17110-9797  
Fax: (717) 787-6957

## 7. PROJECT CONTACT INFORMATION

Name: Cheryl Marks, Ecologist  
Company/Business Name: URS Corporation  
Address: 335 Commerce Dr, Suite 300  
City, State, Zip: Ft. Washington, PA 19034  
Phone: (215) 367-2598 Fax: (215) 367-1000  
Email: cheryl\_marks@urscorp.com

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Cheryl Marks 4/21/10  
applicant/project proponent signature date

**ATTACHMENT 2**

**State-Listed Endangered and Threatened Species**

Attachment 2

| Threatened and Endangered Plant Species that could occur in Montgomery, Chester, and Bucks Counties |                             |                |              |                                 |
|---|-----------------------------|----------------|--------------|---------------------------------|
| Scientific Name   | Common Name                 | Federal Status | State Status | Counties with Recorded Location |
| <i>Agalinis auriculata</i>  | Eared False-foxglove        | --             | Endangered   | Montgomery, Chester, Bucks      |
| <i>Ammanian coccinea</i>  | Scarlet Ammannia            | --             | Endangered   | Bucks                           |
| <i>Arabis missouriensis</i>   | Missouri Rock-cress         | --             | Endangered   | Montgomery                      |
| <i>Arethusa bulbosa</i>   | Swamp-pink                  | --             | Endangered   | Chester                         |
| <i>Aristida purpurascens</i>  | Arrow-feathered Three Awned | --             | Threatened   | Chester, Bucks                  |
| <i>Arnica acaulis</i>   | Leopard's-bane              | --             | Endangered   | Chester                         |
| <i>Asplenium bradleyi</i>   | Bradley's Spleenwort        | --             | Threatened   | Chester                         |
| <i>Bidens bidentoides</i>   | Swamp Beggar-ticks          | --             | Threatened   | Bucks                           |
| <i>Bouteloua curtipendula</i>   | Tall Gramma                 | --             | Threatened   | Chester                         |
| <i>Carex alata</i>  | Broad-winged Sedge          | --             | Threatened   | Bucks                           |
| <i>Carex bicknellii</i>   | Bicknell's Sedge            | --             | Endangered   | Chester, Bucks                  |
| <i>Carex bullata</i>  | Bull Sedge                  | --             | Endangered   | Chester, Bucks                  |
| <i>Carex crinita</i> var. <i>brevicrinis</i>  | Short Hair Sedge            | --             | Endangered   | Chester, Bucks                  |
| <i>Carex polymorpha</i>   | Variable Sedge              | --             | Endangered   | Chester                         |
| <i>Carex prairea</i>  | Prairie Sedge               | --             | Threatened   | Bucks                           |
| <i>Carex sterilis</i>   | Sterile Sedge               | --             | Threatened   | Montgomery, Bucks               |
| <i>Carex tetanica</i>   | A Sedge                     | --             | Threatened   | Chester, Bucks                  |
| <i>Carex typhina</i>  | Cattail Sedge               | --             | Endangered   | Montgomery, Chester, Bucks      |
| <i>Cerastium arvense</i> var. <i>villosissimum</i>  | Serpentine Chickweed        | --             | Endangered   | Chester                         |
| <i>Chasmanthium laxum</i>   | Slender Sea-oats            | --             | Endangered   | Bucks                           |
| <i>Chrysopsis mariana</i>   | Maryland Golden-aster       | --             | Threatened   | Chester, Bucks                  |
| <i>Cirsium horridulum</i>   | Horrible Thistle            | --             | Endangered   | Chester                         |
| <i>Clematis viorna</i>  | Vase-vine Leather-flower    | --             | Endangered   | Chester                         |
| <i>Cyperus diandrus</i>   | Umbrella Flatsedge          | --             | Endangered   | Chester, Bucks                  |
| <i>Cyperus refractus</i>  | Reflexed Flatsedge          | --             | Endangered   | Montgomery, Bucks               |
| <i>Cyperus retrorsus</i>  | Retorse Flatsedge           | --             | Endangered   | Bucks                           |
| <i>Dodecatheon radicum</i>  | Jeweled Shooting-star       | --             | Threatened   | Montgomery                      |
| <i>Echinochloa walteri</i>  | Walter's Barnyard-grass     | --             | Endangered   | Bucks                           |
| <i>Eleocharis obtuse</i> var. <i>peasei</i>   | Wright's Spike-rush         | --             | Endangered   | Bucks                           |
| <i>Eleocharis parvula</i>   | Little-spike Spike-rush     | --             | Endangered   | Bucks                           |
| <i>Eleocharis quadrangulata</i>   | Four-angled Spike-rush      | --             | Endangered   | Bucks                           |
| <i>Elephantopus carolinianus</i>  | Elephant's foot             | --             | Endangered   | Chester                         |
| <i>Ellisia nyctelea</i>   | Ellisia                     | --             | Threatened   | Montgomery,                     |

| Threatened and Endangered Plant Species that could occur in Montgomery, Chester, and Bucks Counties |                                 |                |              |                                 |
|---|---------------------------------|----------------|--------------|---------------------------------|
| Scientific Name   | Common Name                     | Federal Status | State Status | Counties with Recorded Location |
|   |                                 |                |              | Chester, Bucks                  |
| <i>Epilobium strictum</i>   | Downy Willow-herb               | --             | Endangered   | Montgomery, Bucks               |
| <i>Eriophorum gracile</i>   | Slender Cotton-grass            | --             | Endangered   | Montgomery, Bucks               |
| <i>Eriophorum tenellum</i>  | Rough Cotton-grass              | --             | Endangered   | Chester                         |
| <i>Eriophorum viridicarinatum</i>   | Thin-leaved Cotton-grass        | --             | Threatened   | Bucks                           |
| <i>Euphorbia ipecacuanhae</i>   | Wild Ipecac                     | --             | Endangered   | Bucks                           |
| <i>Euphorbia purpurea</i>   | Glade Spurge                    | --             | Endangered   | Chester                         |
| <i>Eurybia spectabilis</i>  | Low Showy Aster                 | --             | Endangered   | Bucks                           |
| <i>Euthamia tenuifolia</i>  | Grass-leaved Goldenrod          | --             | Threatened   | Montgomery, Bucks               |
| <i>Festuca paradoxa</i>   | Cluster Fescue                  | --             | Endangered   | Chester                         |
| <i>Fimbristylis annua</i>   | Annual Fimbry                   | --             | Threatened   | Chester                         |
| <i>Gaylussacia dumosa</i>   | Dwarf Huckleberry               | --             | Endangered   | Montgomery, Chester             |
| <i>Glyceria obtusa</i>  | Blunt Manna-grass               | --             | Endangered   | Montgomery                      |
| <i>Helianthemum bicknellii</i>  | Bicknell's Hoary Rockrose       | --             | Endangered   | Chester, Bucks                  |
| <i>Heteranthera multiflora</i>  | Multi-flowered Mud-plantain     | --             | Endangered   | Bucks                           |
| <i>Hypericum majus</i>  | Larger Canadian St. John's-wort | --             | Threatened   | Chester                         |
| <i>Ilex opaca</i>   | American Holly                  | --             | Threatened   | Chester, Bucks                  |
| <i>Iris prismatica</i>  | Slender Blue Iris               | --             | Endangered   | Montgomery, Chester, Bucks      |
| <i>Iris verna</i>   | Dwarf Iris                      | --             | Endangered   | Bucks                           |
| <i>Isotria medeoloides</i>  | Small-whorled Pogonia           | Threatened     | Endangered   | Chester                         |
| <i>Juncus dichotomus</i>  | Forked Rush                     | --             | Endangered   | Montgomery, Chester, Bucks      |
| <i>Juncus scirpoides</i>  | Scirpus-like Rush               | --             | Endangered   | Montgomery, Chester, Bucks      |
| <i>Juncus torreyi</i>   | Torrey's Rush                   | --             | Threatened   | Chester                         |
| <i>Linum intercursum</i>  | Sandplain Wild Flax             | --             | Endangered   | Montgomery, Chester, Bucks      |
| <i>Listera australis</i>  | Southern Twayblade              | --             | Endangered   | Chester                         |
| <i>Listera cordata</i>  | Heart-leaved Twayblade          |                | Endangered   | Bucks                           |
| <i>Lobelia kalmii</i>   | Brook Lobelia                   | --             | Endangered   | Montgomery                      |
| <i>Lobelia puberula</i>   | Downy Lobelia                   | --             | Endangered   | Chester                         |
| <i>Lycopodiella alopecuroides</i>   | Foxtail Clubmoss                | --             | Endangered   | Bucks                           |
| <i>Lycopodiella appressa</i>  | Southern Bog Clubmoss           | --             | Threatened   | Bucks                           |
| <i>Lycopus rubellus</i>   | Bugleweed                       | --             | Endangered   | Bucks                           |
| <i>Lyonia mariana</i>   | Stagger-bush                    | --             | Endangered   | Montgomery, Chester, Bucks      |

**Threatened and Endangered Plant Species that could occur in Montgomery, Chester, and Bucks Counties**

| Scientific Name                                  | Common Name                    | Federal Status | State Status | Counties with Recorded Location |
|--|--------------------------------|----------------|--------------|---------------------------------|
| <i>Magnolia tripetala</i>                        | Umbrella Magnolia              | --             | Threatened   | Chester, Bucks                  |
| <i>Magnolia virginiana</i>                       | Sweet bay magnolia             | --             | Threatened   | Montgomery, Chester, Bucks      |
| <i>Myriophyllum farwellii</i>                    | Farwell's Water-milfoil        | --             | Endangered   | Bucks                           |
| <i>Myriophyllum heterophyllum</i>                | Broad-leaved Water-milfoil     | --             | Endangered   | Bucks                           |
| <i>Nymphoides cordata</i>                        | Floating-heart                 | --             | Threatened   | Bucks                           |
| <i>Panicum amarum</i> var. <i>amarulum</i>       | Southern Sea-beach Panic-grass | --             | Threatened   | Bucks                           |
| <i>Panicum scoparium</i>                         | Velvety Panic-grass            | --             | Endangered   | Chester, Bucks                  |
| <i>Parnassia glauca</i>                          | Carolina Grass-of-parnassus    |                | Endangered   | Bucks                           |
| <i>Phemeranthus teretifolius</i>                 | Round-leaved Fame-flower       | --             | Threatened   | Chester                         |
| <i>Phyllanthus caroliniensis</i>                 | Carolina Leaf-flower           | --             | Endangered   | Chester                         |
| <i>Poa autumnalis</i>                            | Autumn Bluegrass               | --             | Endangered   | Chester, Bucks                  |
| <i>Poa paludigena</i>                            | Bog Bluegrass                  | --             | Threatened   | Chester                         |
| <i>Polygala cruciata</i>                         | Cross-leaved Milkwort          | --             | Endangered   | Montgomery, Chester, Bucks      |
| <i>Polygala curtissii</i>                        | Curtis's Milkwort              | --             | Endangered   | Chester                         |
| <i>Polygala incarnata</i>                        | Pink Milkwort                  | --             | Endangered   | Chester                         |
| <i>Polystichum braunii</i>                       | Braun's Holly Fern             | --             | Endangered   | Bucks                           |
| <i>Populus balsamifera</i>                       | Balsam Poplar                  | --             | Endangered   | Montgomery                      |
| <i>Potamogeton pulcher</i>                       | Spotted Pondweed               | --             | Endangered   | Bucks                           |
| <i>Potentilla paradoxa</i>                       | Bushy Cinquefoil               | --             | Endangered   | Montgomery                      |
| <i>Prunus maritima</i>                           | Beach Plum                     | --             | Endangered   | Montgomery, Bucks               |
| <i>Ptelea trifoliata</i>                         | Common Hop-tree                | --             | Threatened   | Bucks                           |
| <i>Ptilimnium capillaceum</i>                    | Mock Bishop-weed               | --             | Endangered   | Bucks                           |
| <i>Pycnanthemum torrei</i>                       | Torrey's Mountain-mint         | --             | Endangered   | Bucks                           |
| <i>Quercus falcata</i>                           | Southern Red Oak               | --             | Endangered   | Montgomery, Chester, Bucks      |
| <i>Quercus phellos</i>                           | Willow Oak                     | --             | Endangered   | Chester, Bucks                  |
| <i>Ranunculus fascicularis</i>                   | Tufted Buttercup               | --             | Endangered   | Montgomery, Chester             |
| <i>Rhamnus lanceolata</i>                        | Lance-leaved Buckthorn         | --             | Endangered   | Chester                         |
| <i>Rhexia mariana</i>                            | Maryland Meadow-beauty         | --             | Endangered   | Chester, Bucks                  |
| <i>Rhynchospora capillacea</i>                   | Capillary Beaked-rush          | --             | Endangered   | Bucks                           |
| <i>Sagittaria calycina</i> var. <i>spongiosa</i> | Long-lobed Arrow-head          | --             | Endangered   | Bucks                           |
| <i>Scaphiopus holbrookii</i>                     | Eastern Spadefoot              | --             | Endangered   | Bucks                           |
| <i>Schoenoplectus smithii</i>                    | Smith's Bulrush                | --             | Endangered   | Bucks                           |
| <i>Scleria minor</i>                             | Minor Nutrush                  | --             | Endangered   | Chester                         |
| <i>Scleria muehlenbergii</i>                     | Reticulated Nutrush            | --             | Endangered   | Chester                         |

| <b>Threatened and Endangered Plant Species that could occur in Montgomery, Chester, and Bucks Counties</b> |                                  |                       |                     |  |
|--|----------------------------------|-----------------------|---------------------|--|
| <b>Scientific Name</b>   | <b>Common Name</b>               | <b>Federal Status</b> | <b>State Status</b> | <b>Counties with Recorded Location</b> |
| <i>Scleria pauciflora</i>  | Few Flowered Nutrush             | --                    | Threatened          | Montgomery, Chester, Bucks             |
| <i>Sedum rosea</i>   | Roseroot Stonecrop               | --                    | Endangered          | Bucks                                  |
| <i>Sericocarpus linifolius</i>   | Narrow-leaved White-topped Aster | --                    | Endangered          | Montgomery, Chester, Bucks             |
| <i>Sisyrinchium atlanticum</i>   | Eastern Blue-eyed Grass          | --                    | Endangered          | Chester, Bucks                         |
| <i>Sparganium androcladum</i>  | Branching Bur-reed               | --                    | Endangered          | Bucks                                  |
| <i>Spiranthes romanzoffiana</i>  | Hooded Ladies'-tresses           | --                    | Endangered          | Montgomery                             |
| <i>Spiranthes vernalis</i>   | Spring Ladies'-tresses           | --                    | Endangered          | Montgomery, Chester                    |
| <i>Sporobolus heterolepis</i>  | Prairie Dropseed                 | --                    | Endangered          | Chester                                |
| <i>Symphyotrichum depauperatum</i>   | Serpentine Aster                 | --                    | Threatened          | Chester                                |
| <i>Symphyotrichum novi-belgii</i>  | New York Aster                   | --                    | Threatened          | Montgomery, Bucks                      |
| <i>Triphora trianthophora</i>  | Nodding Pogonia                  | --                    | Endangered          | Montgomery, Chester, Bucks             |
| <i>Triplasis purpurea</i>  | Purple Sandgrass                 | --                    | Endangered          | Bucks                                  |
| <i>Trollius laxus</i>  | Spreading Globeflower            | --                    | Endangered          | Bucks                                  |
| <i>Utricularia intermedia</i>  | Flat-leaved Bladderwort          | --                    | Threatened          | Bucks                                  |
| <i>Utricularia radiata</i>   | Small Swollen Bladderwort        | --                    | Endangered          | Bucks                                  |
| <i>Vernonia glauca</i>   | Tawny Ironweed                   | --                    | Endangered          | Montgomery, Chester                    |
| <i>Viburnum nudum</i>  | Possum-haw                       | --                    | Endangered          | Montgomery, Chester, Bucks             |
| <i>Viola brittoniana</i>   | Coast Violet                     | --                    | Endangered          | Bucks                                  |

Note: -- in the Federal Status column signifies that the species is not a federally-listed species.

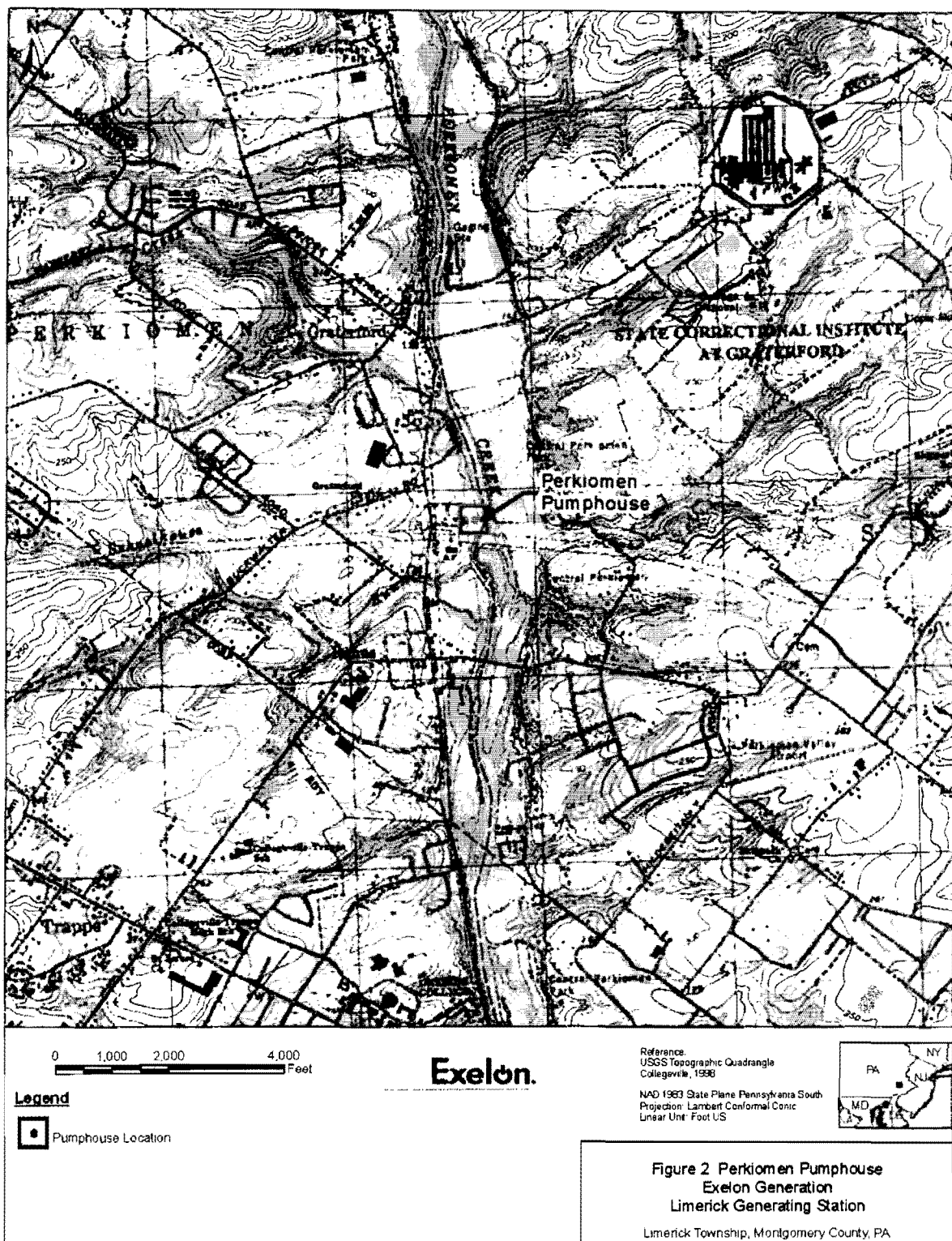
## **ATTACHMENT 3**

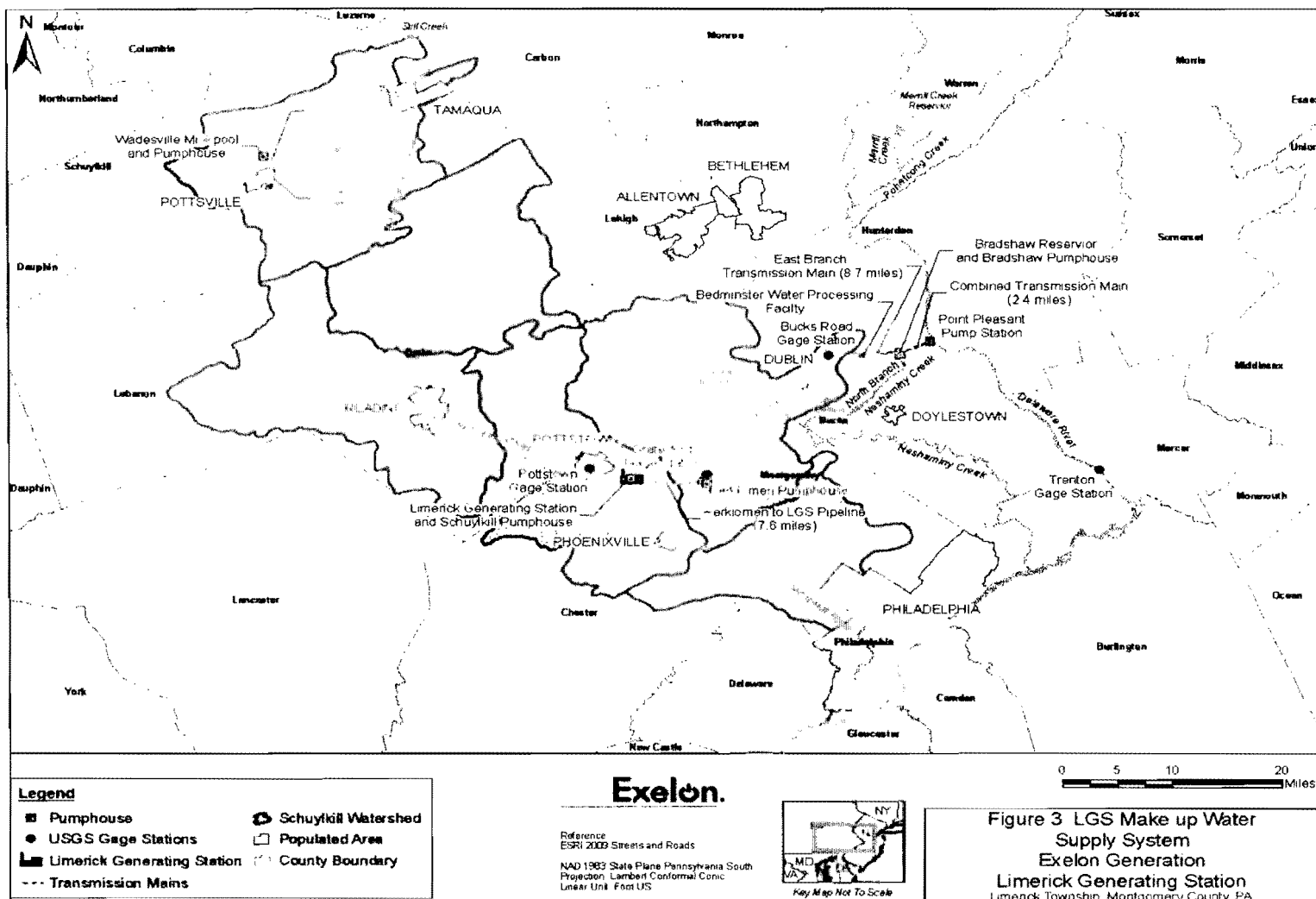
### **Figures Depicting LGS Project Features**

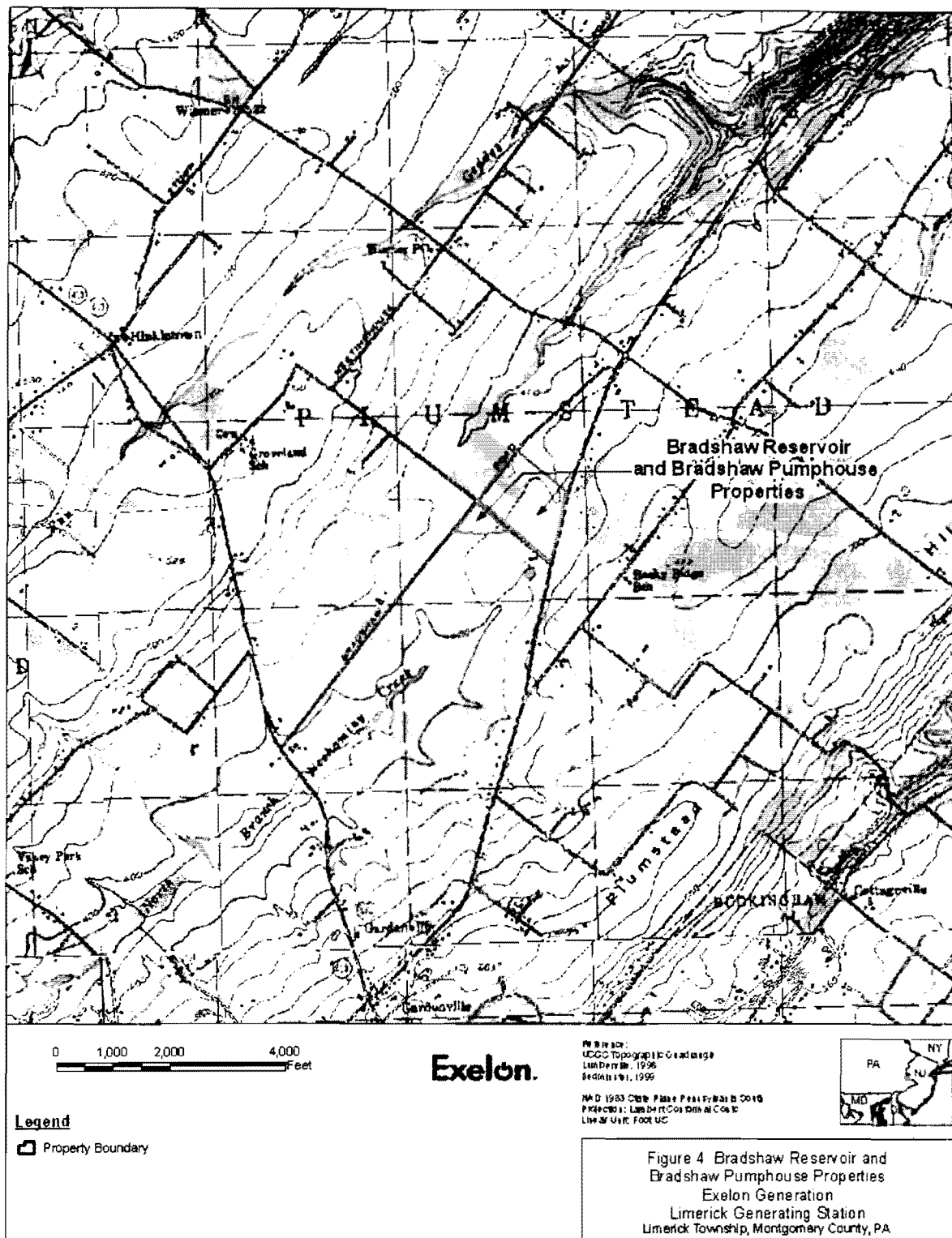
- Figure 1 LGS Plant Site Property Boundaries
- Figure 2 Perkiomen Pumphouse
- Figure 3 LGS Makeup Water Supply System
- Figure 4 Bradshaw Reservoir and Bradshaw Pumphouse Properties
- Figure 5 Bedminster Water Processing Facility Property
- Figure 6 Limerick to Cromby 230 kV Transmission Line Route
- Figure 7 Cromby to North Wales 230 kV Transmission Line
- Figure 8 Cromby to Plymouth Meeting 230 kV Transmission Line Route
- Figure 9 Limerick to Whitpain 500 kV Transmission Line Route

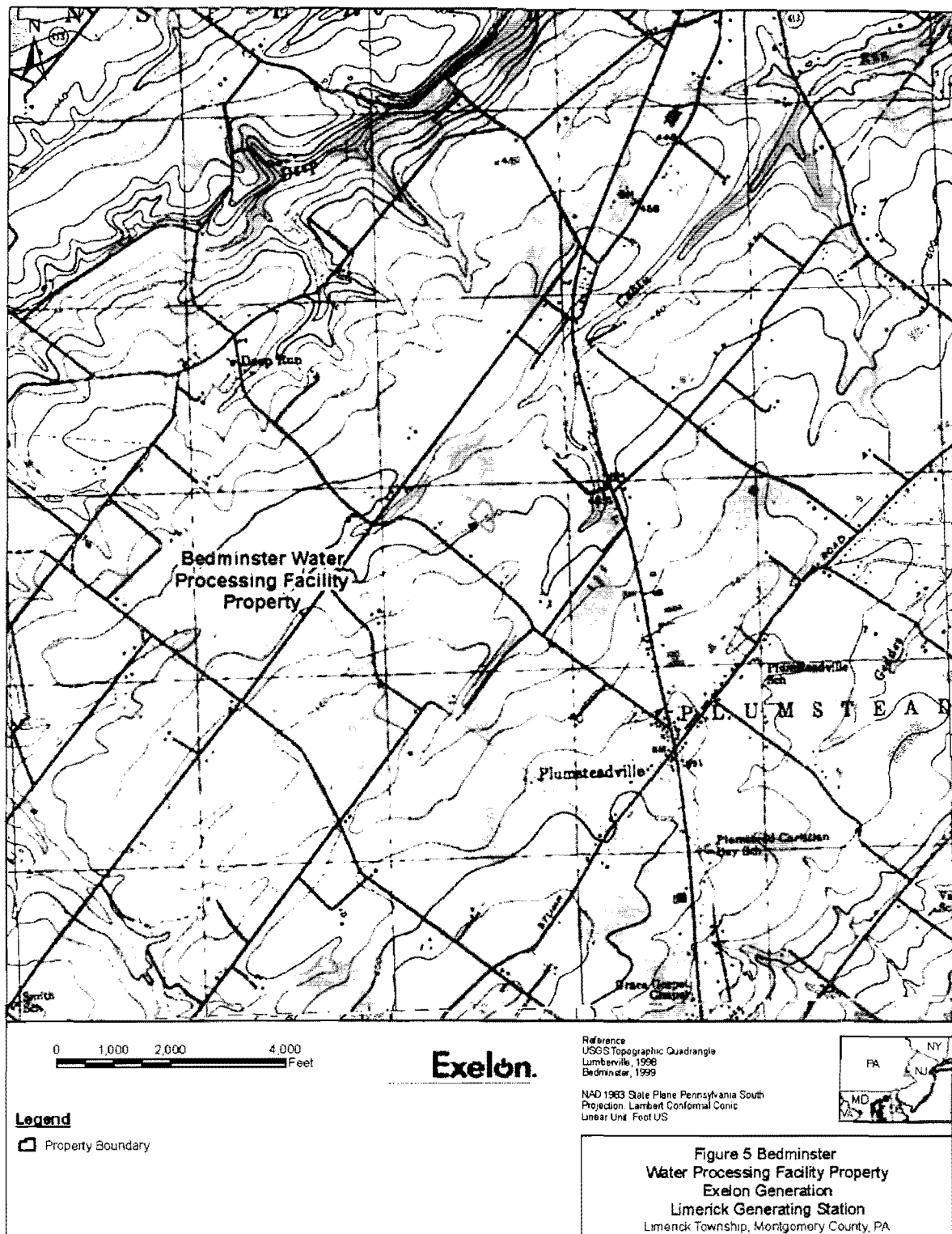


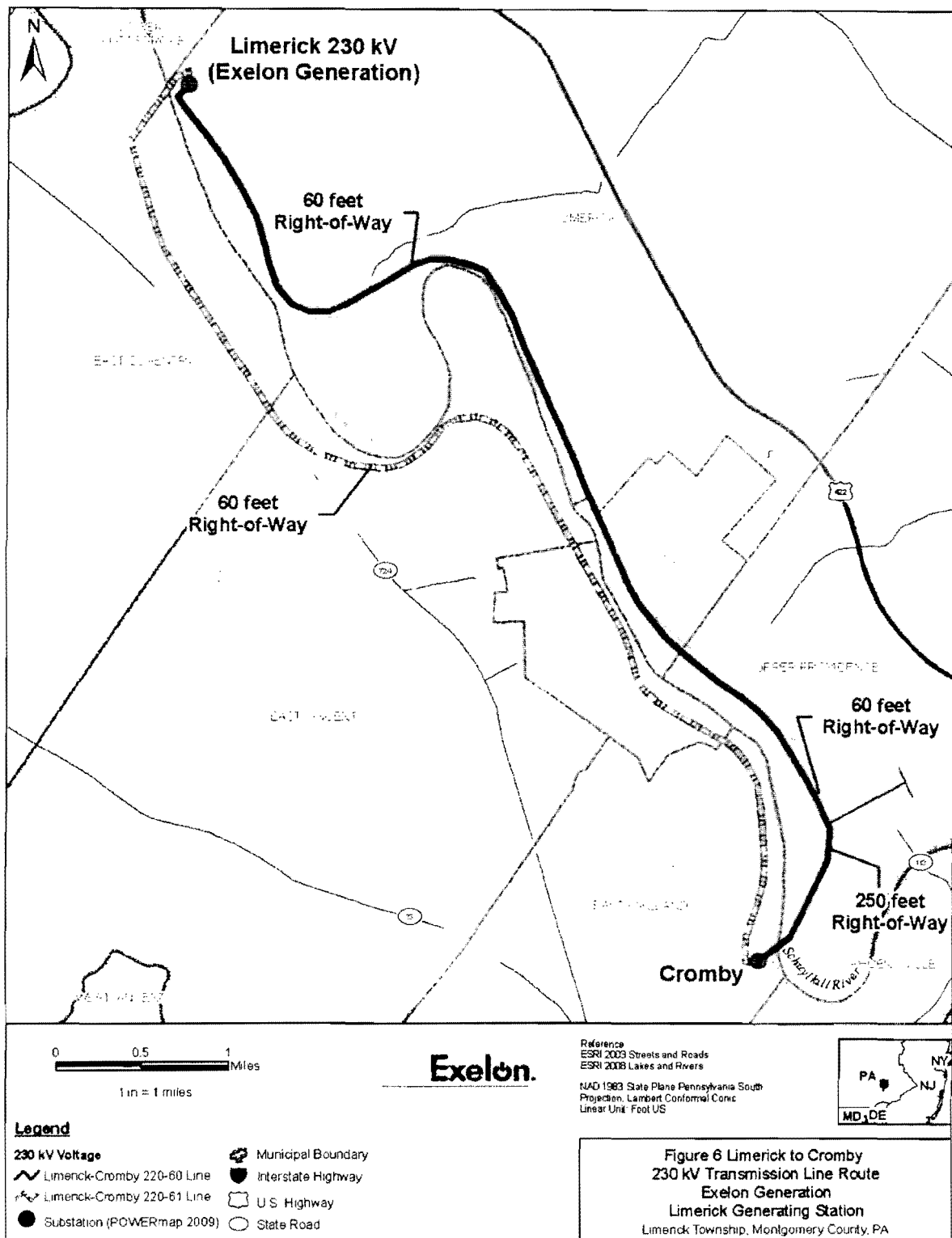


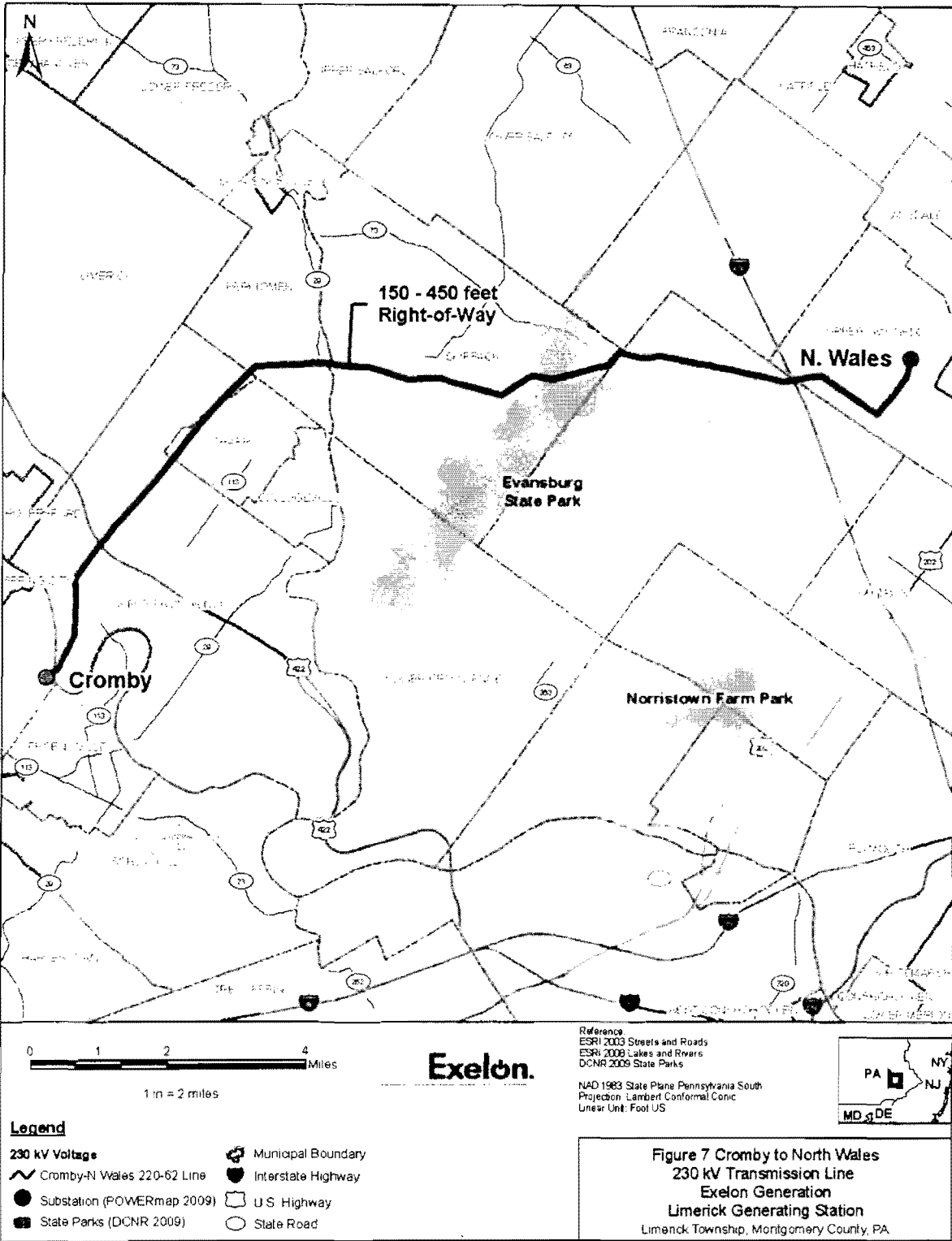


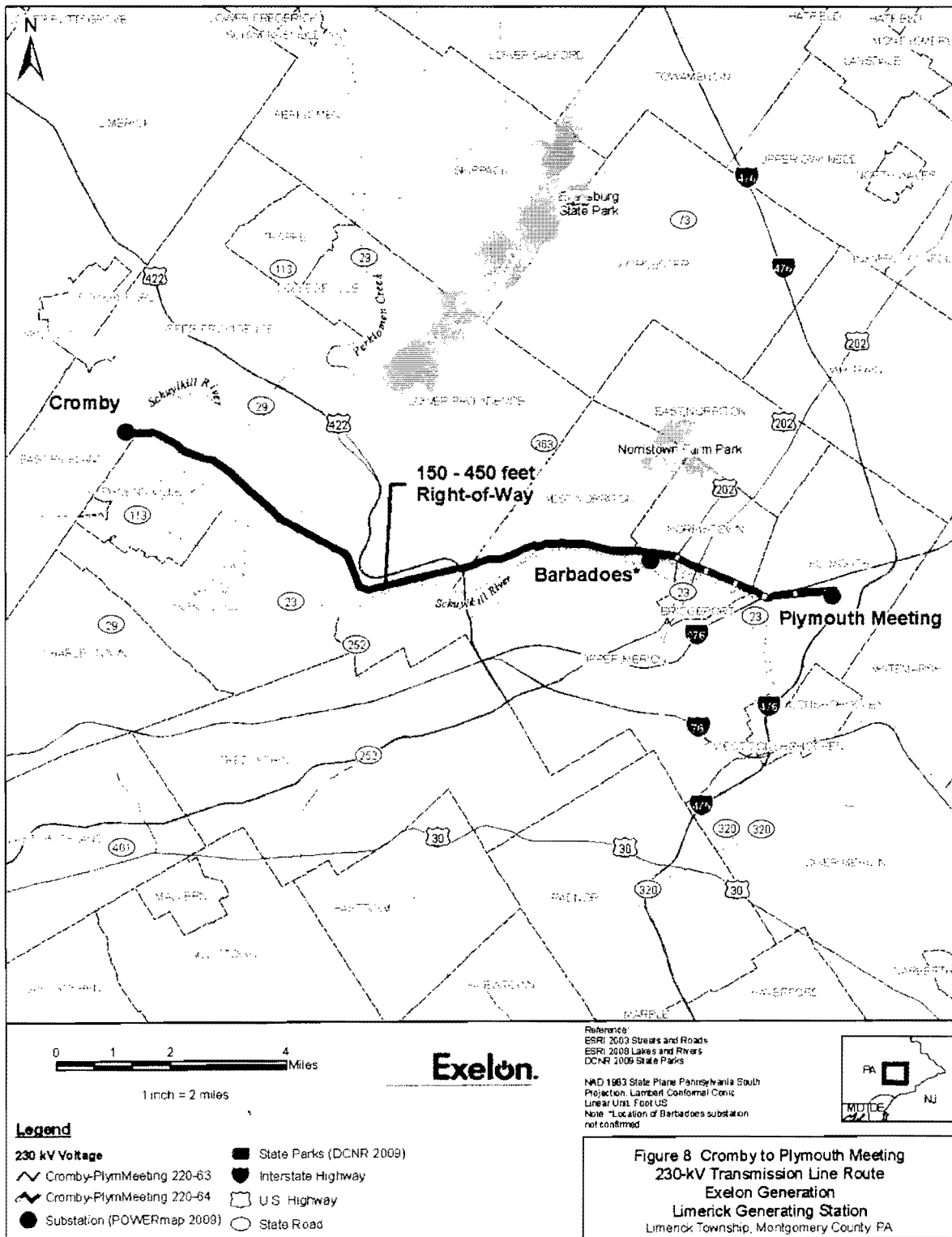


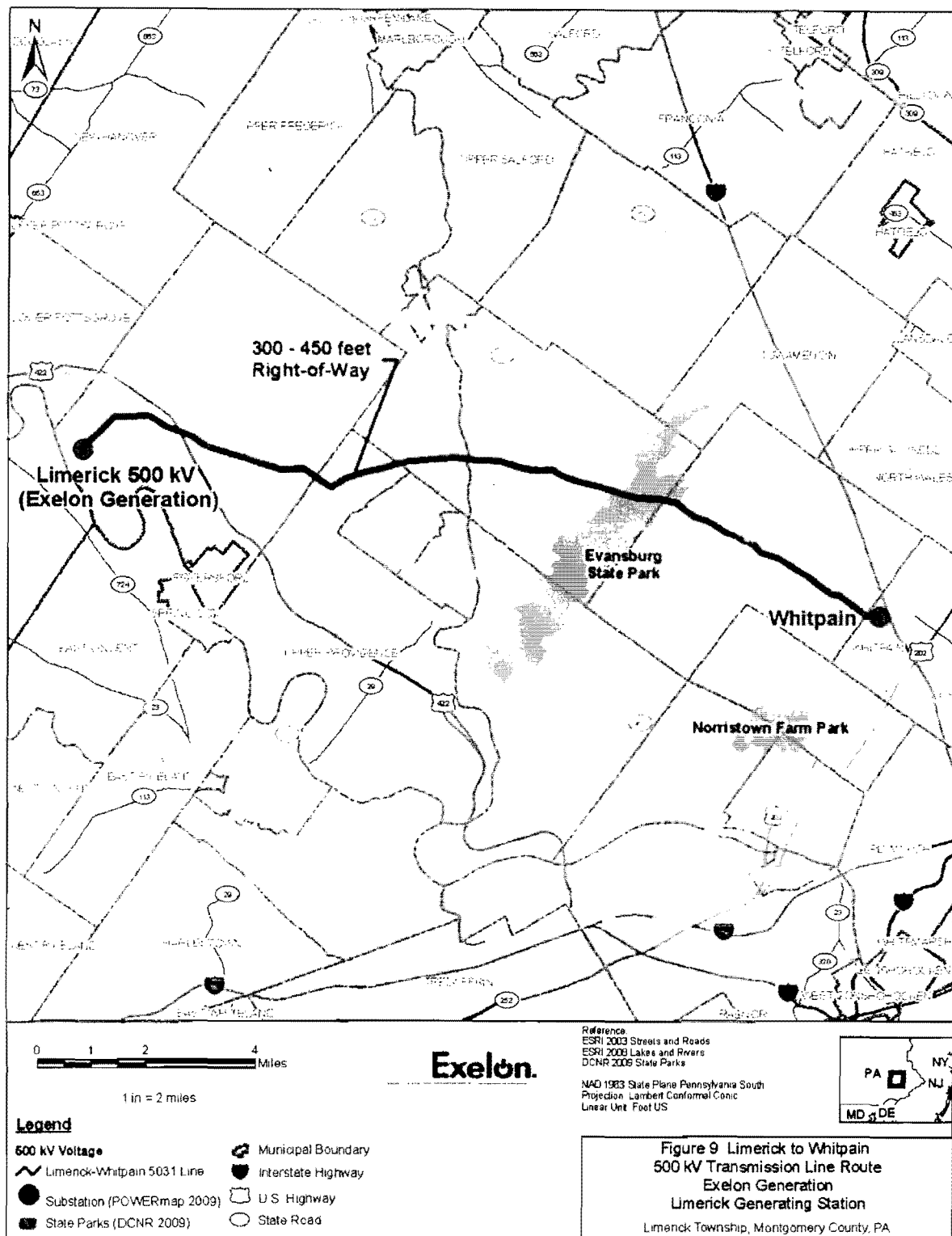














## BUREAU OF FORESTRY

March 9, 2011

PNDI Number: 21136  
3.15.11

Michael P. Gallagher, PE  
Exelon Nuclear  
200 Exelon Way  
KSA/2-E  
Kennett Square, PA 19348

Re: Renewal of Operating Licenses for Limerick Generating Station, Units 1 and 2  
Chester, Montgomery, & Bucks Counties

Dear Mr. Gallagher,

Thank you for your submission of the Pennsylvania Natural Diversity Inventory (PNDI) Environmental Review Large Project Number **21136** for review. PA Department of Conservation and Natural Resources screened this project for potential impacts to species and resources of concern under DCNR's responsibility, which includes plants, terrestrial invertebrates, natural communities, and geologic features only.

**No Impact Anticipated**

PNDI records indicate species or resources of concern are located in the vicinity of the project. However, since the renewal does not involve new construction, refurbishment, ground disturbance, changes to operations or existing land use conditions, DCNR has determined that no impact is likely to occur to species of special concern under our jurisdiction as a result of this project.

For your information, we have included details on the species of special concern which are known near the rights of way of the LGS transmission corridors. If plans change to include earth disturbance in these locations, please coordinate with us further.

**Limerick to Cromby 230kV Transmission Line Route**

***Rotala ramosior* (Tooth-cup, PA Rare):** habitat is described in Plants of PA, by Rhoads and Block as wet, sandy shores and other swampy open ground; flowers July-Sept. Tooth-cup is known in a wet wooded stretch along the west side of the Schuylkill River.

***Cyperus schweinitzii* (Schweinitz's flatsedge, PA Rare):** habitat includes dry or moist sand flats and dunes; flowering and fruiting time is mid-summer to early fall. Schweinitz's flatsedge was found in association with Tooth-cup in a wet wooded area along the west side of the Schuylkill River.

***Arabis missouriensis* (Missouri rock-cress, PA Endangered):** habitat includes dry slopes; flowers April-early June. Missouri rock-cress was found nearby in a dry forested slope with scattered outcrops of Brunswick red shale. If work is planned (especially ROW widening) in the future for the eastern Limerick-Cromby 220-60 Line, please coordinate with us further.

***Arabis patens* (Spreading rock-cress, Currently Unlisted, Proposed PA Threatened):** habitat is moist, rocky woods; flowers April-July. Spreading rock cress was found nearby in a shaded NW-facing rock face.

**Cromby to North Wales 230kV Transmission Line Route**

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P.O. Box 8552, Harrisburg, PA 17105-8552 717-787-3444 (fax) 717-772-0271

- Arabis patens* (Spreading rock-cress, Currently Unlisted, Proposed PA Threatened):** habitat is moist, rocky woods; flowers April-July. Spreading rock cress was found nearby in a shaded NW-facing rock face.
- Iris prismatica* (Slender Blue Iris, PA Endangered):** habitat is moist meadows and sandy or gravelly shores; flowering time is late May-June. Slender blue iris was found nearby in gently sloping land, open with scattered red maples in a mossy floodplain of the Perkiomen Creek.
- Ranunculus fascicularis* (Tufted buttercup, PA Endangered):** habitat includes dry, think woods and exposed calcareous slopes and edges; flowers April-May. Tufted buttercup was found nearby in a ridgetop glade near trails in a state park.

**Cromby to Plymouth Meeting 230kV Transmission Line Route**

- Arabis patens* (Spreading rock-cress, Currently Unlisted, Proposed PA Threatened):** habitat is moist, rocky woods; flowers April-July. Spreading rock cress was found nearby in a shaded NW-facing rock face.
- Andropogon gyrans* (Elliott's beardgrass, Currently unlisted, Proposed PA Rare):** habitat is dry or moist fields or open woods; flowering time is September to October. Elliott's beardgrass was found nearby in an old field.
- Cuscuta campestris* (Dodder, Currently Unlisted, Proposed PA Threatened):** habitat includes thickets and waste ground, parasitic on wild and cultivated hosts; flowers June-September, fruits July-October. This dodder species was previously found in an old impounding basin, near the Schuylkill River.
- Rotala ramosior* (Tooth-cup, PA Rare):** habitat includes wet, sandy shores and other swampy open ground; flowers July-Sept. This population of Tooth-cup was found on an exposed mud flat and sandy-cobbly shores of seasonally flooded shallow basins.

**Limerick to Whitpain Meeting 500kV Transmission Line Route**

- Ranunculus fascicularis* (Tufted buttercup, PA Endangered):** habitat includes dry, think woods and exposed calcareous slopes and edges; flowers April-May. Tufted buttercup was found nearby in a ridgetop glade near trails in a state park.
- Iris prismatica* (Slender Blue Iris, PA Endangered):** habitat is moist meadows and sandy or gravelly shores; flowering time is late May-June. Slender blue iris was found nearby in gently sloping land, open with scattered red maples in a mossy floodplain of the Perkiomen Creek.

This response represents the most up-to-date summary of the PNDI data files and is valid for one (1) year from the date of this letter. An absence of recorded information does not necessarily imply actual conditions on-site. Should project plans change or additional information on listed or proposed species become available, this determination may be reconsidered. Should the proposed work continue beyond the period covered by this letter, please resubmit the project to this agency as an "Update" (including an updated PNDI receipt, project narrative and accurate map).

This finding applies to impacts to DCNR only. To complete your review of state and federally-listed threatened and endangered species and species of special concern, please be sure the U.S. Fish and Wildlife Service, PA Game Commission, and the Pennsylvania Fish and Boat Commission have been contacted regarding this project as directed by the online PNDI ER Tool found at [www.naturalheritage.state.pa.us](http://www.naturalheritage.state.pa.us).

Sincerely,

*Rebecca H. Bowen*

Rebecca H. Bowen, Environmental Review Manager FOR Chris Firestone, Wild Plant Program Mgr.  
Ph: 717-772-0258 ~ [c-rbowen@state.pa.us](mailto:c-rbowen@state.pa.us)

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To support the SEIS preparation process and to ensure compliance with Section 7 of the Endangered Species Act, the NRC requests a list of species and information on protected, proposed, and candidate species and critical habitat that may be in the vicinity of Limerick and its associated transmission line ROWs. The applicant corresponded with your office by letters dated January 19 and March 1, 2011. You replied by letter dated March 2, 2011, that there are bird and mammal species or resources of concern located in the vicinity of the project, but since the project will not involve new construction or tree clearing, that no impact to threatened or endangered species is likely.

To avoid any duplication of effort, you may confirm that the previously provided information to Exelon from your office is still current rather than completing a new review. If any information is not current, please provide any applicable updates. Both letters from Exelon and the March 2011 letter from The Pennsylvania Game Commission are enclosed for your reference (enclosures 6, 7, and 8). As you recommended in your letter to Exelon, we will also contact Mr. Bruce Metz, Land Management Supervisor in the Pennsylvania Game Commission office to confirm that there will be no impacts to nearby State Game lands. In addition, please provide any other information you consider appropriate under the provisions of the Fish and Wildlife Coordination Act.

The NRC staff plans to hold two public license renewal overview and environmental scoping meetings on September 22, 2011, in the area of Limerick. The first session will be held in the afternoon and an identical session will be held later that evening. Both sessions will be held at the Sunnybrook Ballroom, 50 North Sunnybrook Road, Pottstown, PA 19464. The afternoon session will be from 2:00 p.m. to 4:00 p.m. and the evening session will be from 7:00 p.m. to 9:00 p.m. In addition, the NRC plans to hold a one hour Open House prior to each meeting to answer public questions. You and your staff are invited to attend the public meetings and Open Houses. Your office will receive a copy of the draft SEIS along with a request for comments. The anticipated publication date for the draft SEIS is August 2012.

The Limerick LRA is available on the internet at <http://www.nrc.gov/reactors/operating/licensing/renewal/applications/limerick.html>. If you have any questions or require additional information, please contact Ms. Lisa Regner, License Renewal Project Manager, by phone at 301-415-1906 or by e-mail at [Lisa.Regner@nrc.gov](mailto:Lisa.Regner@nrc.gov).

Sincerely,

/RA/

David J. Wrona, Chief  
Projects Branch 2  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

Enclosures:

As stated

cc w/encs: Listserv

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See next page

**ADAMS Accession Nos.:**

Package: ML11234A095

Enclosures 1 – 5: ML112300134

Letter: ML11234A065

Enclosures 6 – 8: ML11234A084

\*Concurrence via e-mail

|        |             |             |              |              |
|--------|-------------|-------------|--------------|--------------|
| OFFICE | LA:DLR/RPB2 | PM:DLR/RPB2 | LA:DLR/RPB2* | BC: DLR/RPB2 |
| NAME   | IKing       | LRegner     | IKing        | DWrona       |
| DATE   | 08/22/2011  | 08/31/2011  | 08/22/2011   | 09/8/2011    |

OFFICIAL RECORD COPY

Letter to Olivia Braun from David J. Wrona dated September 8, 2011

SUBJECT: REQUEST FOR LIST OF PROTECTED SPECIES WITHIN THE AREA UNDER  
EVALUATION FOR THE LIMERICK GENERATING STATION, UNITS 1 AND 2,  
LICENSE RENEWAL APPLICATION REVIEW

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