Exelon Nuclear

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January 19, 2011

Mr. David Densmore
U.S. Fish and Wildlife Service
Pennsylvania Field Office
315 South Allen St., Suite 322
State College, PA 16801

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

Dear Mr. Densmore:

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 under 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 (Treatment) 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 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 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). The receipts indicate that no impacts to federally listed or proposed species and/or special concern species or resources within the jurisdiction of the U.S. Fish and Wildlife Service (USFWS) will occur at the four project areas.

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 several state-listed species could occur in Montgomery, Chester, and Bucks Counties and that these are also federally-listed or proposed species. Attachment 2 contains a list of these species. Exelon Generation is not aware that these have ever been observed on or near the properties associated with LGS or its associated transmission lines. Also, Exelon Generation and PECO adhere to regulatory requirements regarding sensitive areas that could contain listed threatened and endangered species and work closely with your office 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 federally threatened and endangered 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 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,

Michael P. Gallagher

Enclosures:

Attachment 1: Receipts for PNDI Search #s 20100421240174, 20100421240163, 20100406237563, and 20100407237630

Attachment 2: Threatened and Endangered Species that could occur in Montgomery, Chester, and Bucks Counties that are both State Listed and Federally Listed

Attachment 3: Figures Depicting LGS Project Features (Figures 1 to 9)

ATTACHMENT 1

Receipts for PNDI Searchs

Receipt for PNDI Search # 20100421240174, Limerick GS 2

Receipt for PNDI Search # 20100421240163, Perkiomen Pumphouse 7

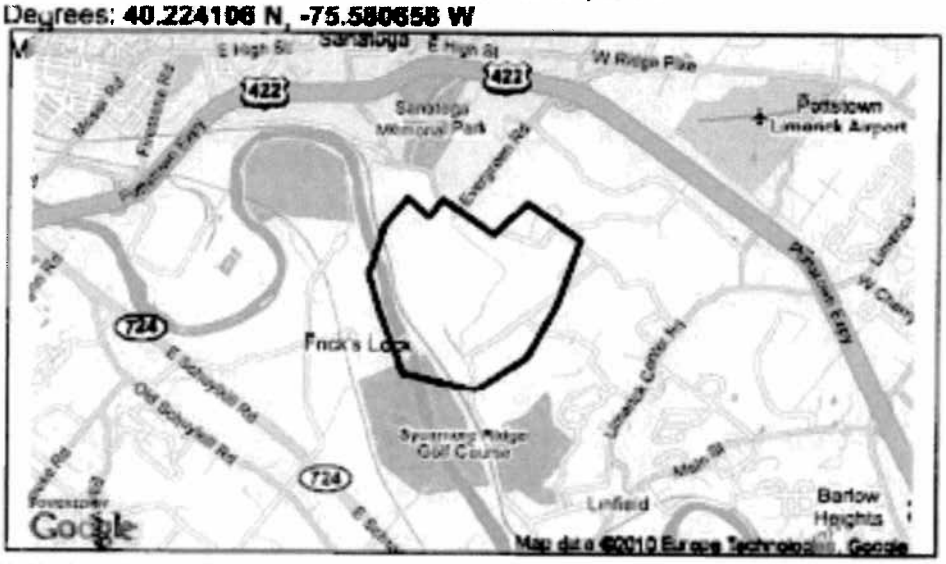
Receipt for PNDI Search # 20100406237563, Bradshaw_pump 11

Receipt for PNDI Search # 20100407237630, Bedminster_WPF 16

PNDI Project Environmental Review Receipt Project Search ID: 20100421240174

1. PROJECT INFORMATION

Project Name: **Limerick GS**
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, -75.580658 W**
Degrees



2. SEARCH RESULTS

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

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: 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

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 jurisdictinal 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

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.

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). 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

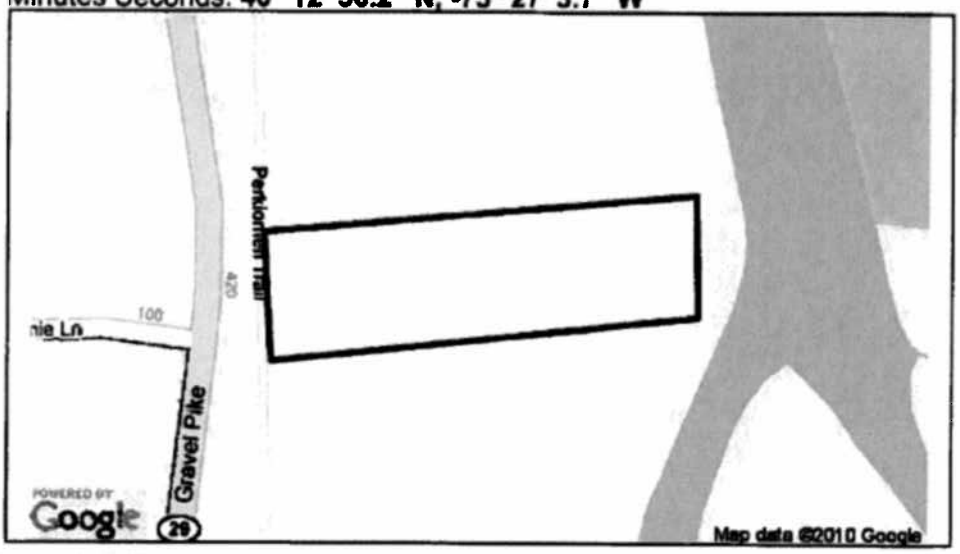
I certify that ALL of the project information contained in this receipt (including project location, project size/configuration, project type, answers to questions) is true, accurate and complete. In addition, if the project type, location, size or configuration changes, or if the answers to any questions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

applicant/project proponent signature 4/21/10 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.

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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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: 20100421240163

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). 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: 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

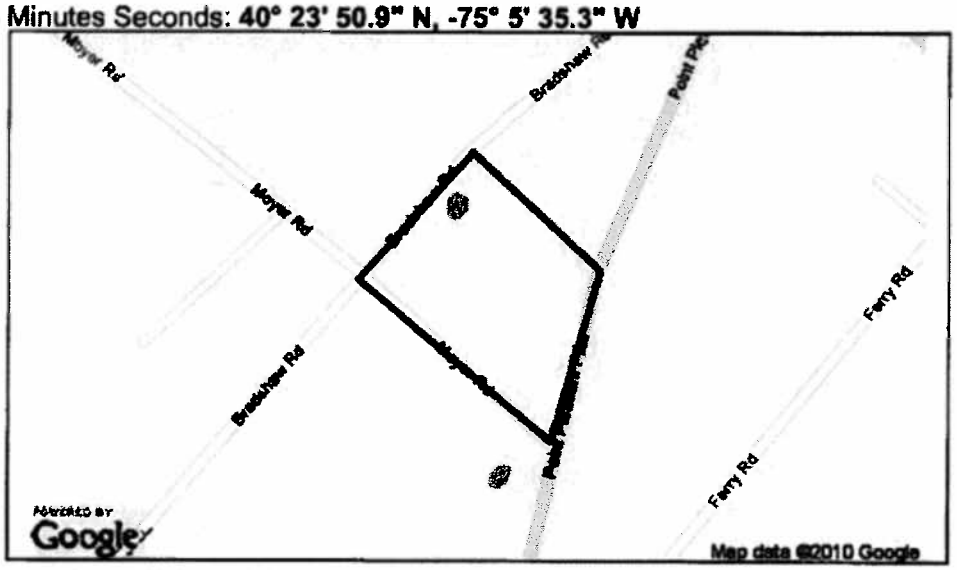
I certify that ALL of the project information contained in this receipt (including project location, project size/configuration, project type, answers to questions) is true, accurate and complete. In addition, if the project type, location, size or configuration changes, or if the answers to any questions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

applicant/project proponent signature 4/21/10 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.

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 jurisdictinal 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

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: 20100406237563

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). 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: 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

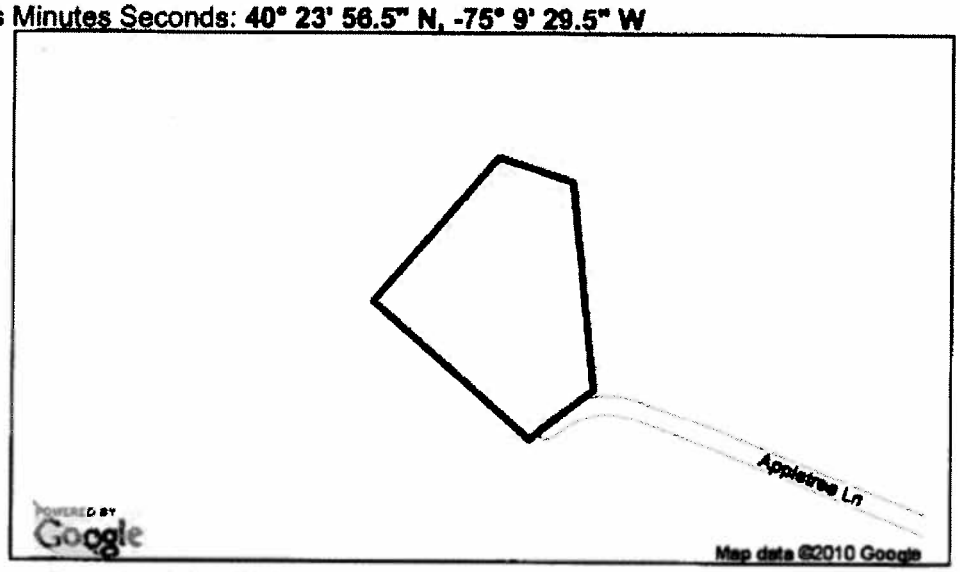
I certify that ALL of the project information contained in this receipt (including project location, project size/configuration, project type, answers to questions) is true, accurate and complete. In addition, if the project type, location, size or configuration changes, or if the answers to any questions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

~~applicant~~/project proponent signature 4/21/10 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.

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.

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: 20100407237630

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

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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) 367-25980 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.

applicant/project proponent signature 4/21/10 date

ATTACHMENT 2

Threatened and Endangered Species that could occur in Montgomery, Chester, and Bucks Counties that are Both State Listed and Federally Listed

Attachment 2

Threatened and Endangered Species that could occur in Montgomery, Chester, and Bucks Counties that are both State Listed and Federally Listed

Scientific Name	Common Name	Federal Status	State Status	Counties with Recorded Location
Mammals				
Myotis sodalis	Indiana Bat	Endangered	Endangered	Montgomery, Chester, Bucks
Birds				
None				
Reptiles and Amphibians				
Glyptemys muhlenbergii	Bog Turtle	Threatened	Endangered	Montgomery, Chester, Bucks
Fish				
Acipenser brevirostrum	Shortnose Sturgeon	Endangered	Endangered	Bucks
Acipenser oxyrinchus	Atlantic Sturgeon	Candidate	Endangered	Bucks
Invertebrates				
Alasmidonta heterodon	Dwarf Wedgemussel	Endangered	Endangered	Montgomery, Chester, Bucks
Plants				
Isotria medeoloides	Small-whorled Pogonia	Threatened	Endangered	Chester

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

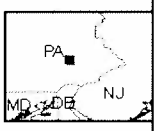
0 875 1,750 3,500 Feet

Exelon.

Reference:
DVRPC 2005 Aerial Imagery
ESRI 2009 Streets and Roads

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

Total Exelon Generation-owned property:
645 acres.

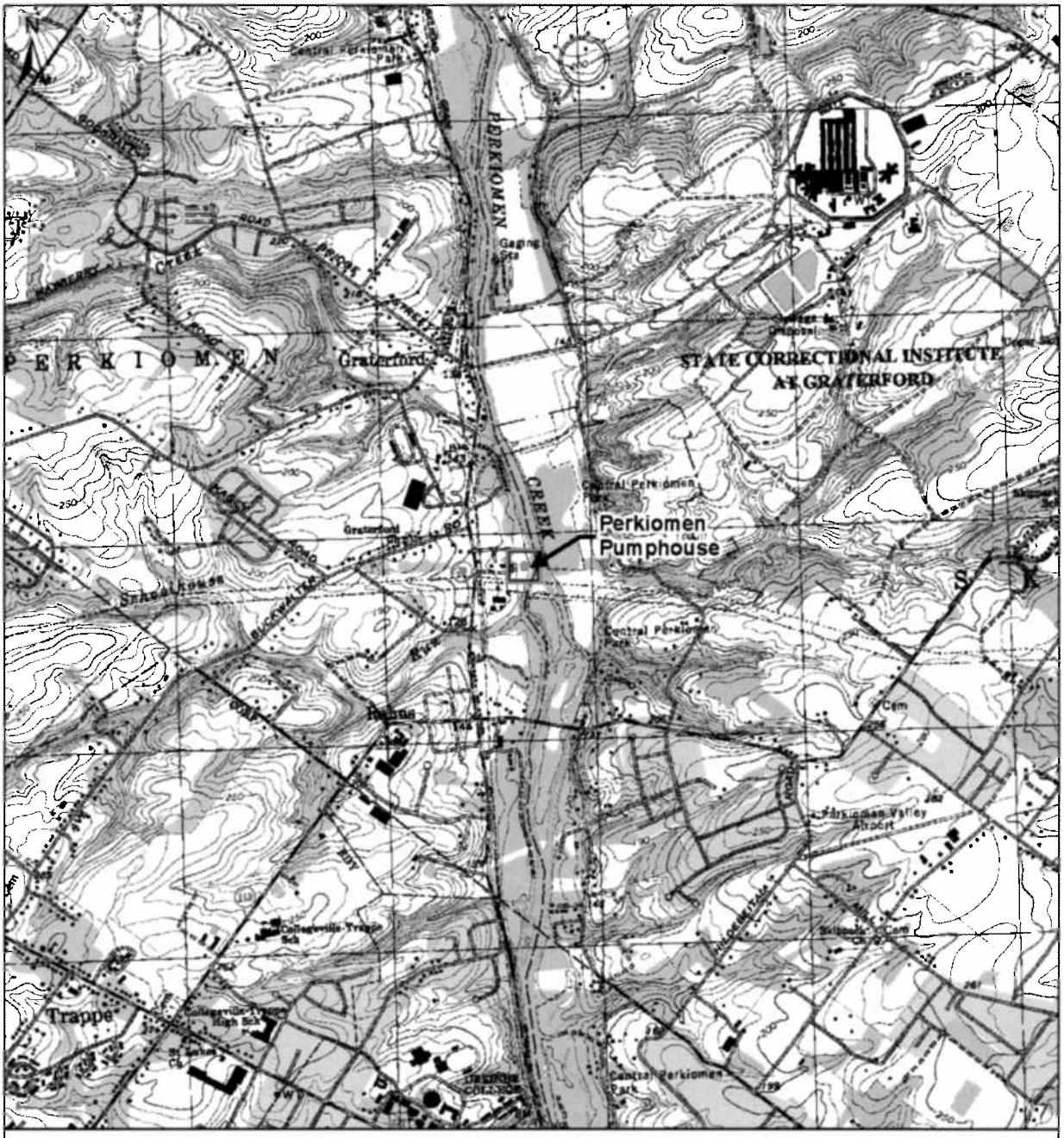


Legend

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

Figure 1 LGS Plant Site Property Boundaries
Exelon Generation
Limerick Generating Station

Limerick Township, Montgomery County, PA



0 1,000 2,000 4,000 Feet

Legend

Pumphouse Location

Exelon.

Reference:
USGS Topographic Quadrangle
Collegeville, 1998

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

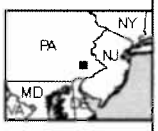


Figure 2 Perkiomen Pumphouse
Exelon Generation
Limerick Generating Station

Limerick Township, Montgomery County, PA

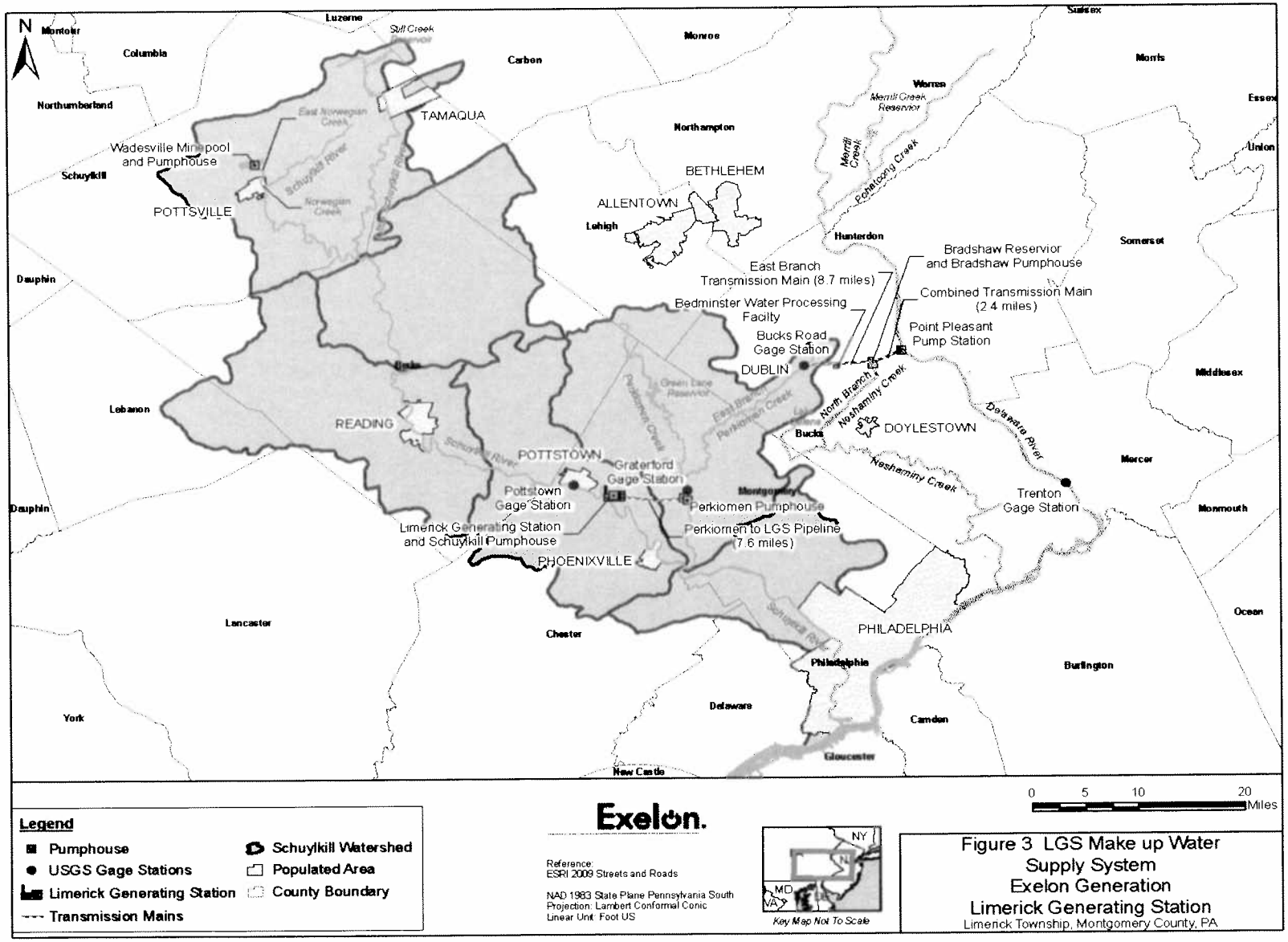
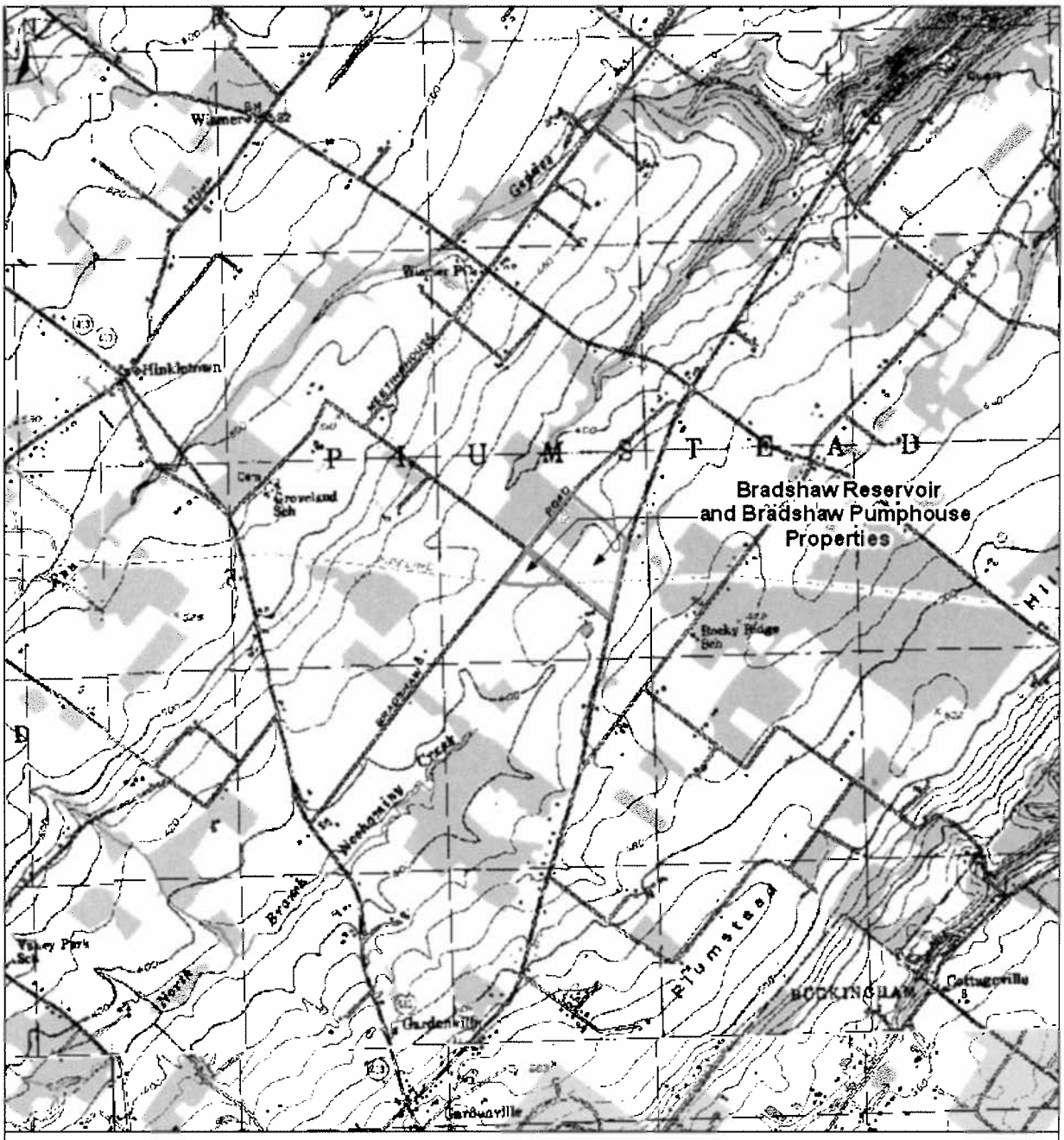


Figure 3 LGS Make up Water Supply System
Exelon Generation
Limerick Generating Station
Limerick Township, Montgomery County, PA

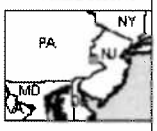


0 1,000 2,000 4,000 Feet

Exelon.

Reference:
USGS Topographic Quadrangle
Lansdale, 1998
Bedminster, 1999

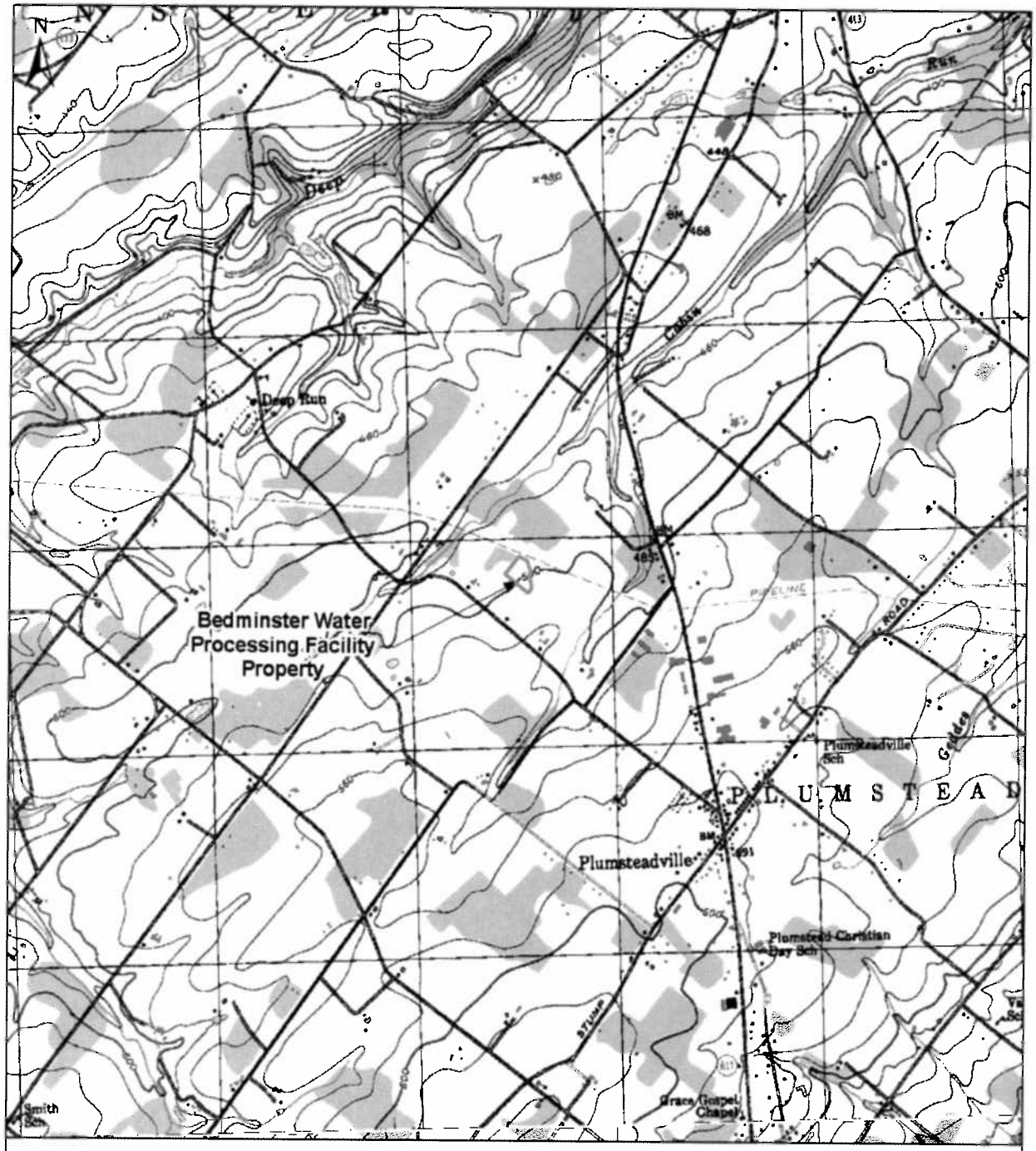
NAD 1983 State Plane Pennsylvania South
Projection: Lambert Conformal Conic
Linear Unit: Foot US



Legend

Property Boundary

Figure 4 Bradshaw Reservoir and Bradshaw Pumphouse Properties
Exelon Generation
Limerick Generating Station
Limerick Township, Montgomery County, PA

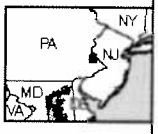


0 1,000 2,000 4,000 Feet

Exelon.

Reference:
USGS Topographic Quadrangle
Lumberville, 1998
Bedminster, 1999

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



Legend

Property Boundary

Figure 5 Bedminster
Water Processing Facility Property
Exelon Generation
Limerick Generating Station
Limerick Township, Montgomery County, PA

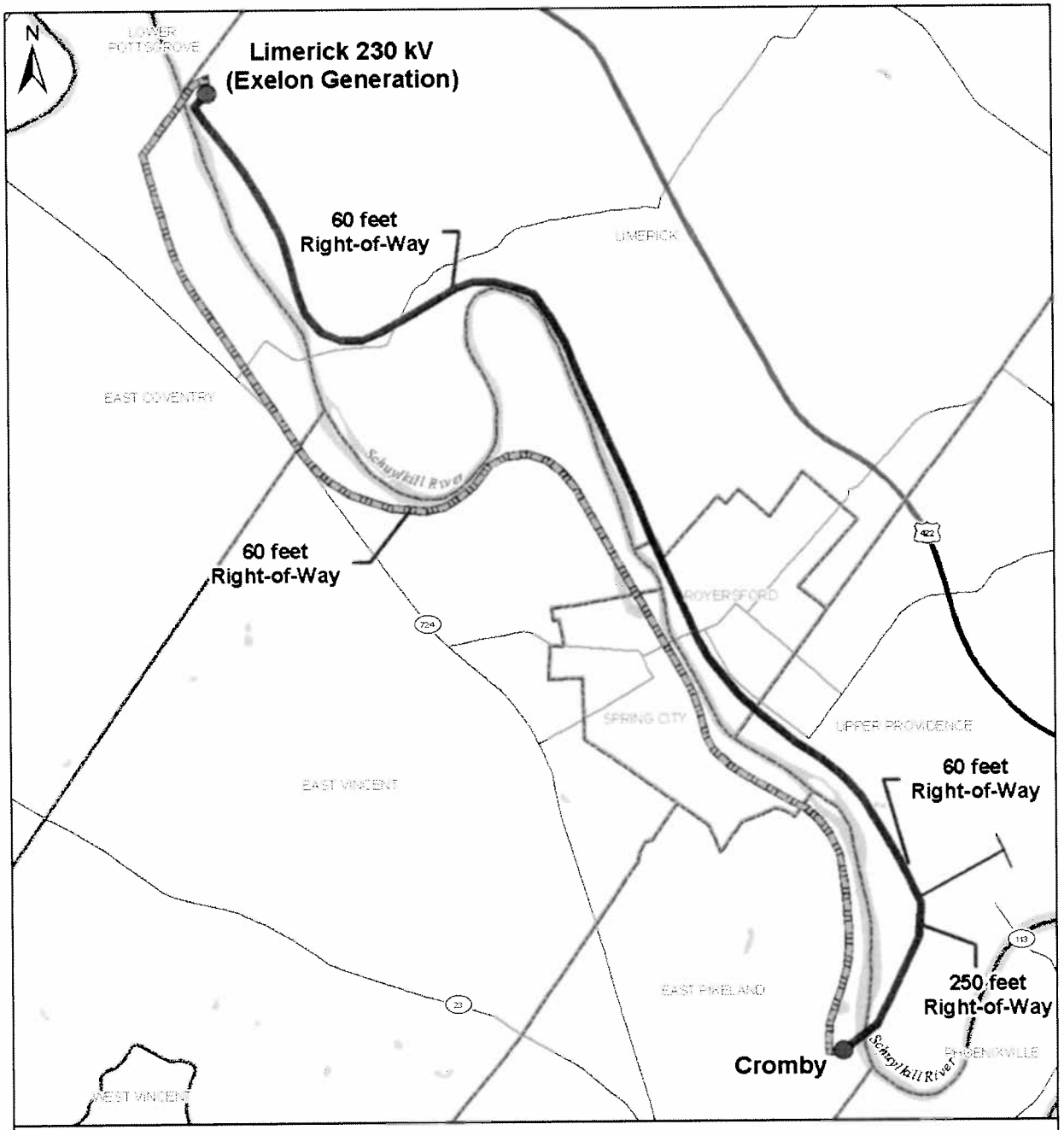


Figure 6 Limerick to Cromby
230 kV Transmission Line Route
Exelon Generation
Limerick Generating Station
Limerick Township, Montgomery County, PA

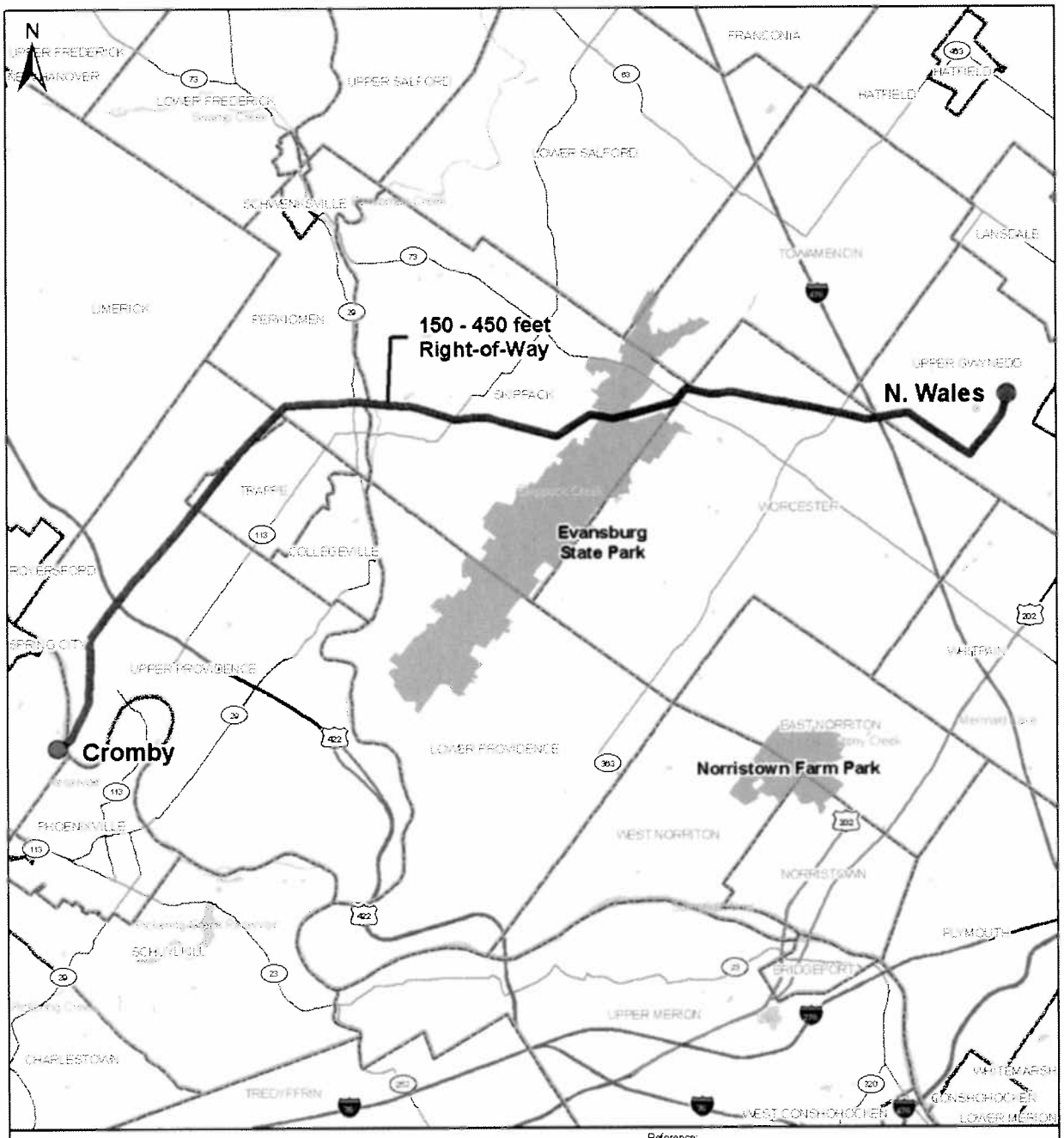
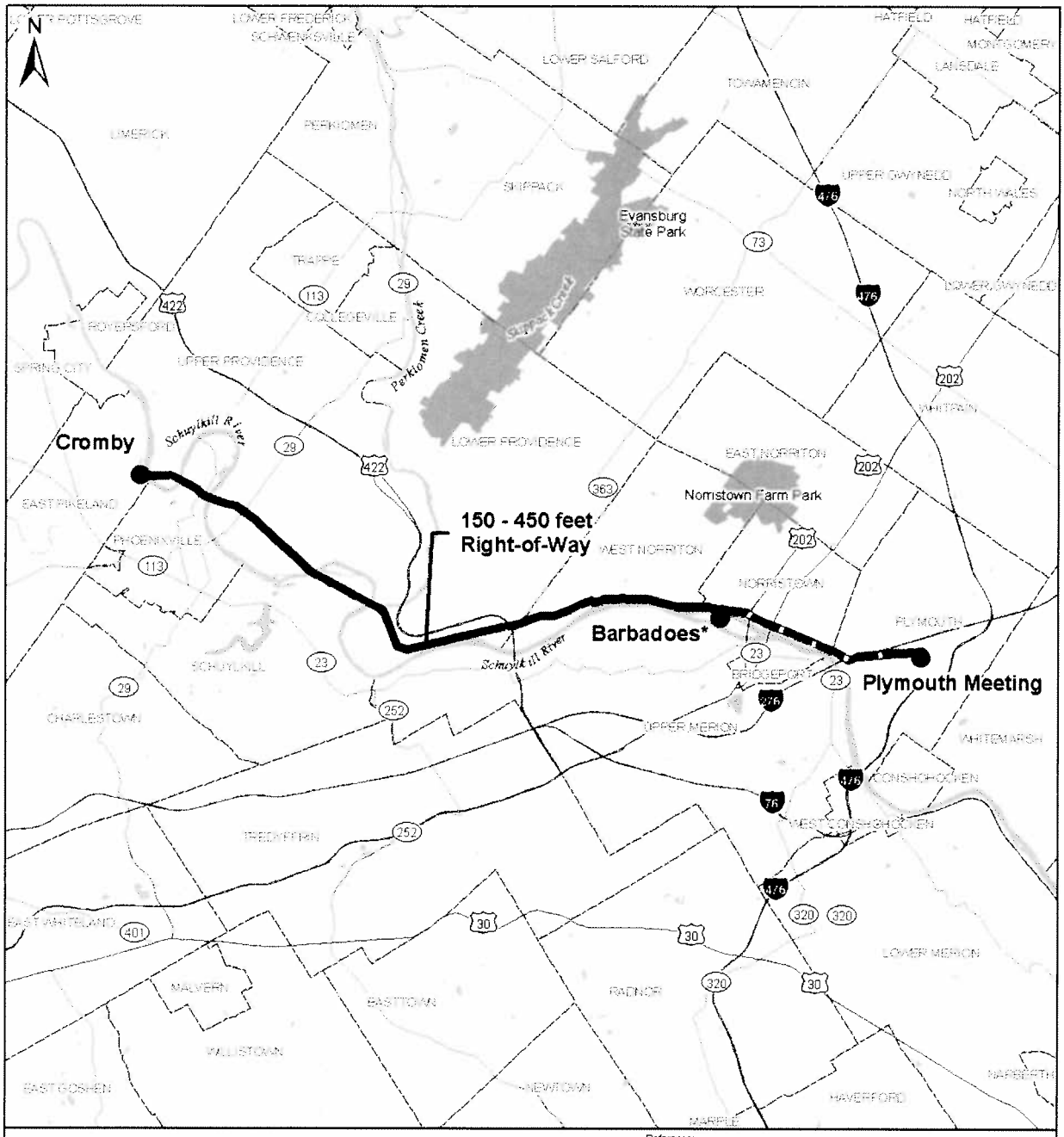


Figure 7 Cromby to North Wales
230 kV Transmission Line
Exelon Generation
Limerick Generating Station
Limerick Township, Montgomery County, PA



0 1 2 4 Miles

1 inch = 2 miles

Exelon.

Reference:
ESRI 2003 Streets and Roads
ESRI 2008 Lakes and Rivers
DCNR 2009 State Parks

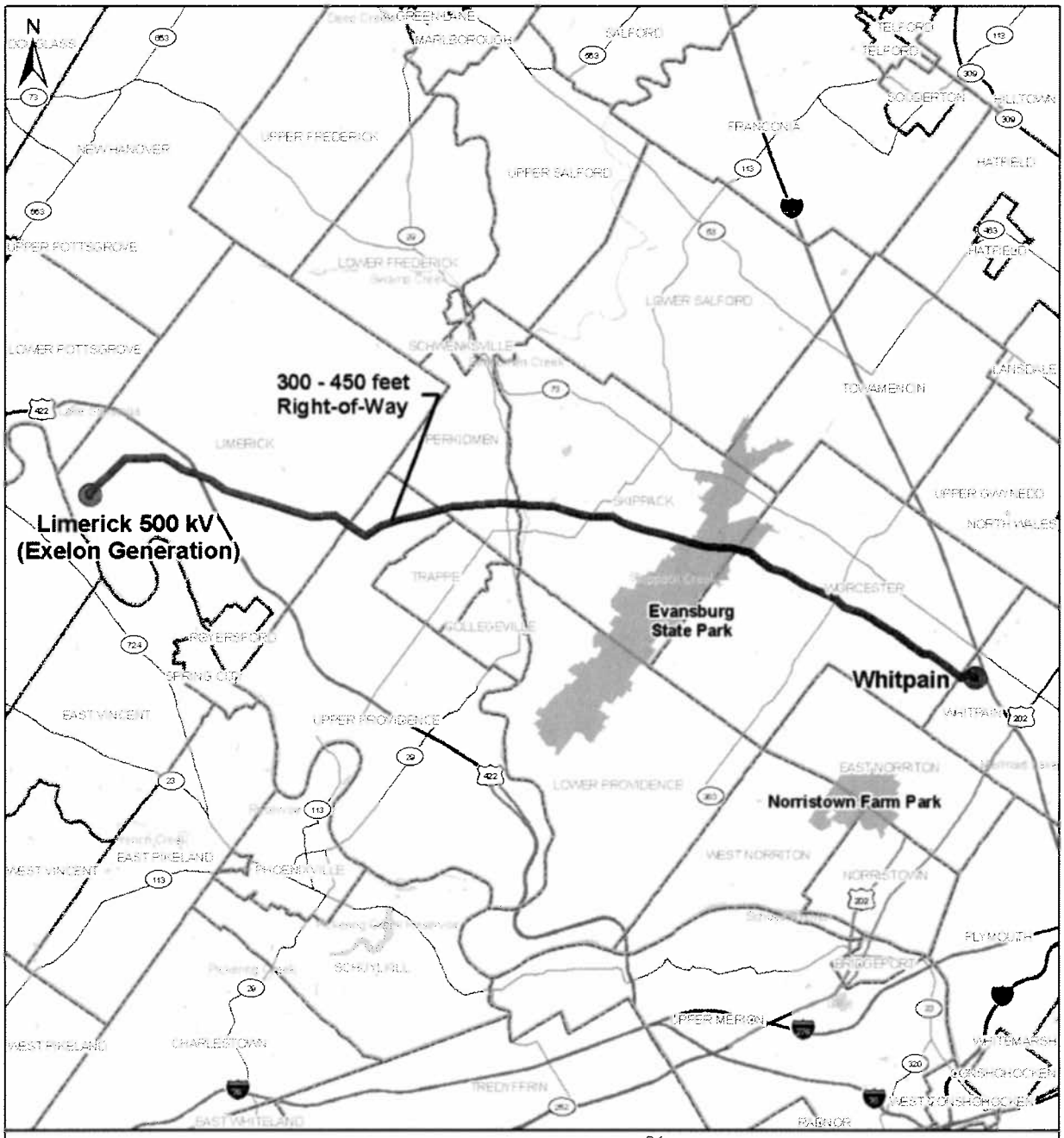
NAD 1983 State Plane Pennsylvania South
Projection: Lambert Conformal Conic
Linear Unit: Foot US
Note: *Location of Barbadoes substation not confirmed

PA NJ MD DE

Legend

230 kV Voltage
- Cromby-PlymMeeting 220-63
- Cromby-PlymMeeting 220-64
- Substation (POWERmap 2009)
- State Parks (DCNR 2009)
- Interstate Highway
- U.S. Highway
- State Road

Figure 8 Cromby to Plymouth Meeting 230-kV Transmission Line Route
Exelon Generation
Limerick Generating Station
Limerick Township, Montgomery County, PA



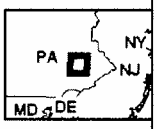
0 1 2 4 Miles

1 in = 2 miles

Exelon.

Reference:
ESRI 2003 Streets and Roads
ESRI 2008 Lakes and Rivers
DCNR 2009 State Parks

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



Legend

500 kV Voltage
- Limerick-Whitpain 5031 Line
- Substation (POWERmap 2009)
- State Parks (DCNR 2009)
- Municipal Boundary
- Interstate Highway
- U.S. Highway
- State Road

Figure 9 Limerick to Whitpain
500 kV Transmission Line Route
Exelon Generation
Limerick Generating Station

Limerick Township, Montgomery County, PA

PNDI # 20100421240174 USFWS Project # 2011-0365

U.S. FISH AND WILDLIFE SERVICE

315 South Allen Street, Suite 322, State College, PA 16801

This responds to your inquiry about a PNDI Internet Database search that resulted in a potential conflict with a federally listed, proposed or candidate species.

PROJECT LOCATION INFORMATION

County: Chester & Montgomery

Township: Springfield

MISC INFORMATION

Date received by FWS: 01/19/2011

[X] ACTIVE [X] ARCHIVE

USFWS COMMENTS [ ] FAXED [ ] MAILED

To: Michael Gallagher

Fax #: _____

Affiliation: Exelon Nuclear

SPECIFIC PROJECT: Limerick Generating Station Unit 1 & 2 Renewal of License

FISH AND WILDLIFE SERVICE COMMENT(s):

____ ***NO EFFECT***

Except for occasional transient species, no federally listed, proposed or candidate species under our jurisdiction are known or likely to exist in the project area. Should project plans change, or if additional information on listed or proposed species becomes available, this determination may be reconsidered.

✓ ***NOT LIKELY TO ADVERSELY AFFECT***

The federally listed Bog Turtle occurs or may occur in or near the project area. However, based on our review of the information provided, including the project description and location (no construction is proposed), no adverse effects to this species are likely to occur. If there is any change in the location, scale, scope, layout or design of the project, further consultation or coordination with the Service will be necessary.

____ This response supersedes our comments of _____, based on our review of the additional project information that was submitted to us on _____.

The above determination is valid for two years from the date of this letter. In addition, this response relates only to federally listed, proposed, and candidate species under our jurisdiction, based on an office review of the proposed project's location and anticipated impacts. No field inspection of the project area has been conducted by this office. Consequently, comments on this form are not to be construed as addressing other Service concerns under the Fish and Wildlife Coordination Act or other authorities. *Please reference the above PNDI # and USFWS Project # in any future correspondence regarding this project.*

This review was conducted by the biologist listed below. He/she can be contacted at 814-234-4090.

___ Jennifer Dombroskie (x 242) ✓ Bonnie Dershem (x 234) ___ Pamela Shellenberger (x 241)
___ Robert Anderson (x 228)

SIGNATURE: _____ DATE: 3/22/11

Supervisor, Pennsylvania Field Office