## **Rikhoff, Jeffrey**

From: Sent: To: Subject: Eccleston, Charlès Thursday, June 03, 2010 8:38 AM Rikhoff, Jeffrey RE: Salem - Hope Creek EJ question

Jeff, thanks for staying on top of this issue.

From: Rikhoff, Jeffrey
Sent: Thursday, June 03, 2010 8:36 AM
To: Provenzano, Susan
Cc: Freeman, Carol; Imboden, Andy; Eccleston, Charles
Subject: RE: Salem - Hope Creek EJ question

Hi Susan,

Using GIS to determine the aggregate 50-mile radius minority population (race and Hispanic ethnicity combined) number and percentage based on 2000 Census SF 1, Table P-4 block group data is correct. The total number and percent minority population can be found by subtracting the total White, Non-Hispanic population from the total 50-mile population. Please have your people generate a correct figure showing the location of minority block groups in the 50-mile radius based on the percent minority population presented in the text, and, similarly, a figure showing the location of low-income population block groups based on the total number and percent of individuals determined to be living in poverty in the 50-mile radius population.

I generally ignore the EJ data and maps in the ER, because of double counting and the 20% significance factor (which is only supposed to tell us if more detailed EJ analysis is required). If I have no other way of generating a corrected map, I'll use the maps in the ER to show the location of higher density minority and low-income populations. I'll also use any descriptive information on the locations of the nearest minority and low-income populations to the nuclear power plant.

I'll call you around 9 AM to discuss.

Thanks,

jeff

### **Jeffrey Rikhoff**

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From: Provenzano, Susan [mailto:SUSAN.PROVENZANO@aecom.com] Sent: Wednesday, June 02, 2010 4:27 PM To: Rikhoff, Jeffrey Cc: Freeman, Carol Subject: Salem - Hope Creek EJ question

Jeff,

We submitted the draft of Section 4.9.7, Environmental Justice, to Charles Eccleston yesterday. Our staff is currently working on the census "number crunching" (using GIS) in order to provide the data needed to fill in the following sentence in Section 4.9.7:

"Those census block groups (4585) wholly or partly within the 50-mi radius of Salem and HCGS were reported in the 2000 Census as having a minority population of xx or xx percent of the total population in these block groups (USCB 2000a)."

We are using the guidance you gave us back when we prepared the Vogtle license renewal SEIS: use Table P-4 from SF 1, and include as minorities the non-Hispanic Black, American Indian, Asian, Native Hawaiian, some other race, and two or more races populations plus the Hispanic population (essentially the total population minus the white non-Hispanic population). This is in keeping with the NRC *Procedural Guidance for Preparing Environmental Assessments and Considering Environmental Issues* requirement that "the aggregate of all minority populations is to be treated as one population and analyzed."

Our question (as to how to present the discussion of minority data by block groups) arose when we looked into the PSEG Salem and Hope Creek Environmental Reports' discussion of EJ, including their data tables and figures. In the past, we have used the 50-mile radius figures from the applicant's ER, as well as the ER 50-mile radius data, in the relicensing SEIS EJ discussion (we did that in Vogtle). Upon close examination of the PSEG ER data, however, it appears that Table DP-1 (SF 1) instead of Table P-4 was used. Thus, the ER "Aggregate of Minorities Populations" data and figure include individuals who identify themselves as a member of a non-white race and who are also of Hispanic ethnicity. We note that there is a separate Hispanic category in the data table and a "Hispanic Ethnicity Minority Population" figure – the ER does not add the "Aggregate of Minorities" and the "Hispanic" data together, so there is no outright double counting. However, individuals who identify themselves as a member of a non-white race and also of Hispanic ethnicity are represented twice, in the "Aggregate of Minorities" count and in the "Hispanic" count. Although it may be valid to present minority data this way, it is different from the minority population we are calculating for the 50-mile radius and does not represent the aggregate minority population called for in the NRC *Procedural Guidance* (that is, the "Aggregate of Minorities" population in the ER does not include the white Hispanic population).

We are using GIS to develop the 50-mile radius aggregate minority population number and percentage based on block group data (using Table P-4). Therefore, we have the option of using this same data set to calculate the number of block groups exceeding the minority criteria for the various races and Hispanic ethnicity, and also to generate figures for the SEIS. For instance, we could have one figure showing the location of the block groups included in the 50-mile radius aggregate minority population number presented in the text.

We would like to discuss this issue with you to ensure that we present the most accurate and complete analysis possible. Carol Freeman is copied on this email because she has been interacting with our GIS staff doing the analysis for us. Please give me a call at your convenience. If you like, you can email me with time that is good for you and Carol and I can call you.

Thanks, Susan

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