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Susquehanna River Basin Commission

a water management agency serving the Susquehanna River Watershed

September 23, 2011

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

Re: PPL Bell Bend Nuclear Power Plant;
IFIM and Aquatic Studies Workplan
Response to SRBC Comments – BNP-2011-071;
Salem Township, Luzerne County, Pennsylvania

Dear Mr. Harpster:

The Susquehanna River Basin Commission (Commission) staff has reviewed the "Response to SRBC Comments regarding the IFIM and Aquatic Studies Workplan" for Bell Bend Nuclear Power Plant (BBNPP) submitted in the referenced correspondence and provides the following comments.

Our comments pertain to Enclosure 1 and are as follows:

1. The Response to **Comment 6** states that BBNPP will be operated at a steady rate and therefore "temperature hourly changes are expected to be small." That may be the case during normal operation of BBNPP; however, there will be thermal transients during plant startup and shutdown. The Commission requires that the transient temperatures be analyzed to assure that temperature rises are within the limit of 2°F during a one-hour period. The Commission acknowledges there may be regulatory overlap with the NPDES permitting process. We consider NPDES related issues to be resolved if PPL BBNPP can demonstrate that the issues are properly addressed in the NPDES permitting process. Similarly, **Comment 14**, dealing with chemical additives to the blowdown discharge, can be resolved through the NPDES permitting process.
2. In Response to **Comment 9** Table 2, there are significant discrepancies between results computed by the CORMIX model and the observed results from Ecology III studies. Of particular concern is the comparison in the "Distance to the 0.5°F isotherm." One scenario correlates well, but the other four scenarios do not correlate, with actual observances being higher by a factor of five or more than the CORMIX

model results, and in one case, the actual observance was significantly lower. Because of the lack of correlation, the Commission can not accept studies performed using the CORMIX model. Please advise us of your corrective action in this matter.

3. The Commission requires that the revised study plan be resubmitted after the comments are incorporated. The results of the studies performed as part of the study plan should be submitted for our review.

If you have any questions regarding the above, please contact Paula Ballaron at (717) 238-0423, extension 222, or Andrew Dehoff, extension 221.

Sincerely yours,



Andrew D. Dehoff
Manager, Project Review

cc: Gary Petrewski; PPL
Michael Canova; USNRC
Donald Palmrose; USNRC
Stacey Imboden; USNRC
Amy Elliott; USACE, Baltimore District
Susan Weaver; PADEP
Eugene Trowbridge; PADEP
Mark Hartle; PFBC
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Jennifer Kagel; USFWS
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Jamie Davis; USEPA