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NRC3-12-0001

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Cindy Bladey, Chief, Rules Announcements and Directives Branch (RADB)
Office of Administration
U.S. Nuclear Regulatory Commission
Mail Stop: TWB-05-B01M
Washington, DC 20555-0001

- References:
- 1) Federal Register, "Detroit Edison Company; Notice of Availability of Draft Environmental Impact Statement for a Combined License for Unit 3 at the Enrico Fermi Atomic Power Plant Site," dated October 28, 2011 (76 FR 66998)
 - 2) Letter from Scott Flanders (USNRC) to Peter W. Smith (Detroit Edison), "Notice of Availability of the Draft Environmental Impact Statement for the Fermi Unit 3 Combined License Application Review," dated October 20, 2011
 - 3) NUREG-2105, "Draft Environmental Impact Statement for Combined License (COL) for Enrico Fermi Unit 3," dated October 2011

Subject: Detroit Edison Company Comments on NUREG-2105, "Draft Environmental Impact Statement for Combined License (COL) for Enrico Fermi Unit 3," Docket ID NRC-2008-0566

In Reference 2, the NRC informed Detroit Edison of the availability of the Draft Environmental Impact Statement (DEIS) for the Fermi 3 COLA, NUREG-2105 (Reference 3). References 1 and 2 requested that any comments on the Fermi 3 DEIS be submitted by January 11, 2012, to the NRC Office of Administration. Detroit Edison appreciates the opportunity to comment on the Fermi 3 DEIS and commends the NRC staff on the thorough analysis presented and the timely publication of the DEIS in accordance with the NRC review schedule for the Fermi 3 COLA.

Detroit Edison's review of the DEIS focused on differences, if any, between the DEIS and information contained in the Fermi 3 Environmental Report (ER), Fermi 3 Final Safety Analysis Report (FSAR), responses to NRC Requests for Additional Information, and other previously submitted documentation. The attachment to this letter provides Detroit Edison's comments associated with the Fermi 3 DEIS, including the pertinent references to previously submitted

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information. The comments delineated in the attachment, identify inconsequential differences that do not affect the analyses or conclusions as presented in the Fermi 3 DEIS.

If you have any questions, or need additional information, please contact me at (313) 235-3341.

Sincerely,



Peter W. Smith, Director
Nuclear Development – Licensing and Engineering
Detroit Edison Company

Attachment: 1) Detroit Edison Comments on the Fermi 3 DEIS

cc: Bruce Olson, NRC Fermi 3 Environmental Project Manager
Jerry Hale, NRC Fermi 3 Project Manager (w/o attachment)
Adrian Muniz, NRC Fermi 3 Project Manager (w/o attachment)
Michael Eudy, NRC Fermi 3 Project Manager (w/o attachment)

Attachment 1

NRC3-12-0001

Detroit Edison Comments on the Fermi 3 DEIS

(3 pages)

Detroit Edison Comments on the Fermi 3 Draft Environmental Impact Statement (DEIS)

While reviewing the Fermi 3 DEIS, Detroit Edison identified minor differences between the DEIS and information contained in the Fermi 3 Environmental Report (ER), Fermi 3 Final Safety Analysis Report (FSAR), Detroit Edison responses to NRC Requests for Additional Information (RAI), and other previously submitted documentation. The comments identified below involve inconsequential differences which do not affect the analyses discussed or the conclusions presented in the DEIS. The following paragraphs provide Detroit Edison comments associated with the Fermi 3 DEIS, including pertinent references to previously submitted information.

Fermi 3 DEIS Section 1.1, Background

DEIS page 1-2, lines 17-19, and DEIS page 1-8, lines 29-31, state that the ESBWR (Economic Simplified Boiling Water Reactor) final design certification rule was published in the Federal Register (76 FR 14437) on March 16, 2011. The final design certification rule for the ESBWR has not yet been published, however the ESBWR final design approval was published in the Federal Register (76 FR 14437) on March 16, 2011. The text, "final design certification rule," should be corrected to "final design approval."

Fermi 3 DEIS Figure 3-1, Fermi Site Layout Showing Existing and Proposed Facilities: Power Block and Adjacent Facilities

DEIS page 3-3. The legend of this figure, which identifies the structures on the Fermi 3 site, should be corrected to represent the structures as identified by Fermi 3 ER Figure 2.1-4 (ER Revision 2, ML110600498, Figure 2.1-4 updated via Detroit Edison letter NRC3-11-0026, dated July 15, 2011, ML112000169). Specifically, identified structure numbers 10 through 22 within the DEIS Figure 3-1 legend are currently inaccurate.

Fermi 3 DEIS Section 3.2.2.3, Other Permanent Structures that Interface with the Environment

DEIS page 3-15, lines 29-34, discuss Fermi 3 standby diesel generators, the auxiliary boiler, and the diesel fire pumps. For consistency with related DEIS descriptions (e.g. DEIS page 3-35 line 26, page 5-55 line 35, page 5-93 line 23, Table 5-22, etc.) and the Fermi 3 ER (ER Revision 2, ML110600498), section 3.2.2.3 should also discuss the Fermi 3 Ancillary Diesel Generators (ADGs).

Fermi 3 DEIS Section 3.4.2.3, Radioactive Waste-Management Systems

DEIS page 3-33, line 29, references ESBWR DCD Figure 11.4-1. The Fermi 3 COLA replaces DCD Figure 11.4-1 in Chapter 11 of the FSAR with Figure 11.4-1R as shown in FSAR (FSAR Revision 3, ML110600475). The figure was originally included in the Fermi 3 FSAR as submitted in Detroit Edison letter NRC3-10-0010 on February 16, 2010 (ML10050278), and most recently updated in Detroit Edison letter NRC3-11-0034 on August 24, 2011 (ML11238A049). The DEIS description of waste management systems, as relates to this figure, is accurate; however Fermi 3 FSAR Figure 11.4-1R should be referenced instead of the DCD figure.

Fermi 3 DEIS Section 3.4.2.3, Radioactive Waste-Management Systems

DEIS page 3-33, lines 35-36, refer to solid radioactive waste management system (SWMS) temporary storage in the "Auxiliary and Radwaste Buildings" prior to being shipped. The Fermi 3 COLA plant design describes an Auxiliary Boiler building adjacent to the Radwaste building; however temporary storage is not planned in the Auxiliary Boiler building. Fermi 3

FSAR Chapter 11 describes Fermi 3 radioactive waste management, including the SWMS and storage within the Radwaste building (FSAR Revision 3, ML110600475). This statement should be reworded to describe SWMS storage in the Radwaste building only.

Fermi 3 DEIS Section 4.1.1, The Site and Vicinity

DEIS page 4-5, lines 26-27, and page 4-7, lines 24-25. Text on these two DEIS pages indicates that the Fermi 3 switchyard will be constructed on the farmland southwest of Fermi Drive. The Fermi 3 site plan indicates that the switchyard will be constructed on the other side of Fermi Drive (see ER Figure 2.1-4). In addition, the site plan described in the Fermi 3 ER involves no permanent impacts to prime farmland. The impacts associated with the farmland on the southwest side of Fermi Drive are temporary to support Fermi 3 construction laydown areas (see ER Figure 2.1-4). This text should be corrected to represent the site plan as discussed in the Fermi 3 ER (ER Revision 2, ML110600498, Figure 2.1-4 updated via Detroit Edison letter NRC3-11-0026, dated July 15, 2011, ML112000169).

Fermi 3 DEIS Figure 4-1, Areas Affected by Building Activities for Fermi 3

DEIS page 4-12. The Fermi 3 areas affected by construction, identified in DEIS Figure 4-1, should be corrected for consistency with the Fermi 3 ER and discussion in the DEIS. The DEIS figure does not identify the small areas of permanent impacts (approximately 2-1/2 acres) near the planned meteorological tower which are identified in the Fermi 3 ER (see ER Figures 2.1-4 and 4.2-1). Also, the impacted areas along the north east side of Fermi Drive should be extended all the way to Fermi Drive instead of showing a strip of un-impacted land (see ER see ER Figures 2.1-4 and 4.2-1). In addition, the previously developed area associated with the Fermi 3 discharge pipe should be extended further into Lake Erie to accurately represent the current site condition and past site development (see discussion in ER Section 4.3.2.2 "Impacts to Lake Erie," and ER Figure 4.3-5). See Fermi 3 ER Revision 2 (ML110600498) with pertinent updates submitted via Detroit Edison letter NRC3-11-0026, dated July 15, 2011 (ML112000169).

Fermi 3 DEIS Section 5.3.1.3, Important Terrestrial Species and Habitats

DEIS page 5-23, lines 18-19 refer to 29 acres of restored prairie that will be permanently converted to use by Fermi facilities. This should identify only 10 acres of permanent impacts. As shown in Fermi 3 ER Figure 2.1-4 (see also ER Figures 4.2-1, 4.3-2 and 4.3-3), ER Table 4.1-1, and discussed in ER section 4.1.2, approximately ten acres of this area will be permanently impacted by construction of the Fermi 3 switchyard. Temporary construction impacts are identified for the remaining prairie restoration area. See Fermi 3 ER Revision 2 (ML110600498), with pertinent updates submitted via Detroit Edison letter NRC3-11-0026, dated July 15, 2011 (ML112000169).

Fermi 3 DEIS Section 5.7.1.3, Drift Deposition

DEIS page 5-91, lines 26-27, and DEIS Table 5-35, page 5-140 (Air Quality and Meteorology section) indicate that cooling water is treated to reduce salt concentrations in the context of cooling tower drift and drift deposition. DEIS Table 5-35, page 5-137 (Land Use Impacts section) appropriately states that salt drift mitigation, beyond the use of cooling tower drift eliminators, is not required. The relationship of cooling water treatment in the DEIS context associated with cooling tower drift is unclear. It is unclear how cooling water blowdown discharge water treatment affects drift deposition as implied by its inclusion in DEIS Section 5.7.1.3.