

PMVictoriaESPPEm Resource

From: Terry, Tomeka
Sent: Friday, April 13, 2012 11:04 AM
To: VictoriaESP Resource
Subject: FW: Aquatic Ecology & Alternatives RAIs
Attachments: Aquatic Ecology & Alternatives RAIs.doc

From: Terry, Tomeka
Sent: Friday, April 13, 2012 11:03 AM
To: 'Joshua.Trembley@exeloncorp.com'
Cc: 'Vinikour, William S.'; rkolpa@anl.gov; Cushing, Jack; Kuntzleman, Nancy; 'Avci, Halil I.'; Wescott, Konstance L.
Subject: Aquatic Ecology & Alternatives RAIs

JT,

Attached are aquatic ecology and alternatives draft RAIs. If you have any questions, please let me know.

Thanks!
Tomeka

Hearing Identifier: Victoria_ESP_Public
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Request for Additional Information No. 6414 Revision 0

**Victoria County Station ESP
Exelon Texas
Docket No. 52-042
SRP Section: ESP EIS 4.3.2 - Aquatic Impacts
Application Section: Part 3, Environmental Report**

QUESTIONS for Environmental Projects Branch 2 (RAP2)

ESP EIS 4.3.2-1

(a) ESRP Section 4.3.2 directs the staff to review aquatic impacts from the construction of transmission lines, while Section 5.6.2 directs the staff to evaluate the aquatic impacts from the operation and management of transmission lines. American Electric Power (AEP) will be the transmission service provider for the proposed VCS. Information on AEP's procedures for constructing and maintaining transmission lines at stream and river crossings, as well as best management practices to minimize impacts to these resources or special status species that may occur within the right-of-way(s), was not provided in the ER. This information, which should be contained in AEP's procedural guideline(s), would provide the information needed for the impact analyses to be presented in the EIS. A document in Exelon's eDocs Library describes AEP's tree trimming, but does not address water body crossings or protection of special status species. Provide a copy of AEP's best management practices for construction and maintenance of transmission lines.

(b) ESRP Section 4.3.2 directs the staff to include an assessment of both onsite and offsite construction activities, including access corridor construction. The proposed rail spur connection crosses a number of streams and wetlands. Information is needed that describes the construction of this rail spur in more detail, particularly as it relates to construction over streams and wetlands and mitigative measures that would be taken to minimize construction impacts. Describe the aquatic and wetland impacts from constructing the rail spur connection and any mitigative measures associated with its construction.

Request for Additional Information No. 6394 Revision 0

**Victoria County Station ESP
Exelon Texas**

Docket No. 52-042

SRP Section: ESP EIS 9.3.1 - Alternative Site Selection Process

Application Section: Part 3, Environmental Report Section 9.3

QUESTIONS for Environmental Projects Branch 2 (RAP2)

ESP EIS 9.3.1-1

The ESRP Section 9.3 requires NRC to review the process by which the applicant has identified and evaluated alternative sites for the proposed action. Details of the applicant's site selection methodology must be available to support the NRC's evaluation of its reasonableness and to make sure that there is no other site that is obviously superior to the one being proposed by the applicant. This requires an analysis of alternative sites to support the determination of whether there is an obviously superior site in terms of overall environmental impacts and costs when compared to the site proposed by the applicant. Selection of candidate areas was separate from identifying and evaluating candidate sites and sufficient details of the decision-making process were not provided in the ER. Provide a discussion regarding the manner in which the candidate areas in the site selection process for the alternative sites were identified. Include all of the factors that influenced these selections and the values assigned to each criterion.

Request for Additional Information No. 6395 Revision 0

Victoria County Station ESP

Exelon Texas

Docket No. 52-042

SRP Section: ESP EIS 9.3.1 - Alternative Site Selection Process

Application Section: Part 3, Environmental Report Section 9.3

QUESTIONS for Environmental Projects Branch 2 (RAP2)

ESP EIS 9.3.1-2

Per the ESRP Section 9.3, the NRC must evaluate each of the alternative sites proposed by the applicant. All information available that would contribute to that evaluation should be considered. Engineering evaluations that were discussed at the alternative site audit by the applicant with respect to the potential flooding at the Matagorda site speak directly to that site's overall suitability. The environmental impacts that would be associated with necessary amendments to the site to address flooding potential must be incorporated into NRC's evaluation of the site's overall suitability. To ensure equitable evaluations of all alternative sites and their comparison to the proposed site in support of NRC's determination of the existence of an environmentally superior site, flooding potential considerations are being requested for each of the alternative sites as well as the proposed site.

(a) Provide a discussion regarding the detailed engineering evaluation of the Matagorda site that resulted in an identification of flooding potential from storm surge or other external events, the determination that fill would be needed to elevate the ground surface in the power block to prevent storm surge impacts, and the revised score for the site that resulted from the introduction of this new information.

(b) Provide evaluations of the flooding potential of the VCS site and the other alternative sites, as applicable. Provide qualitative analyses of the environmental impacts that would result from the actions necessary to amend the VCS site and each alternative site to overcome flooding and other issues/concerns at each location. Include both the direct and indirect impacts to the various resources from the necessary amendments to each site.

Request for Additional Information No. 6396 Revision 0

Victoria County Station ESP

Exelon Texas

Docket No. 52-042

SRP Section: ESP EIS 9.3 - Alternative Sites

Application Section: Part 3, Environmental Report Section 9.3

QUESTIONS for Environmental Projects Branch 2 (RAP2)

ESP EIS 9.3-3

The ESRP Section 9.3 requires that evaluations of alternative sites be based on reasonable and relevant criteria that could support an adequate evaluation of each site for the environmental impacts that would result should it be chosen as the preferred site. Impacts to water users and to aquatic ecosystems are among the criteria on which the evaluation should be based. Requests for additional details of probable site layouts and intake and discharge features will provide the NRC reviewers with a more complete understanding of the flexibility each site offers with respect to site development, including power block orientations and intake and discharge locations and thus allow for a determination of the potential for minimization, mitigation or avoidance of environmental impacts at each of the sites. Provide additional details regarding potential power block locations and orientations and cooling water intake and discharge locations for each of the alternative sites.