May 31, 2012

Ms. Marilyn C. Kray
Vice President
New Plant Development
Exelon Generation
200 Exelon Way
Kennett Square, PA 19348

SUBJECT: ENVIRONMENTAL REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 16 RELATED TO SOCIOECONOMICS AND ENVIRONMENTAL JUSTICE VICTORIA COUNTY STATION EARLY SITE PERMIT APPLICATION

Dear Ms. Kray:

By letter dated March 25, 2010, Exelon Nuclear Texas Holdings, LLC (Exelon) submitted its application to the U.S. Nuclear Regulatory Commission (NRC) for an early site permit (ESP) for the Victoria County Station (VCS) site in accordance with the requirements contained in Title 10 of the *Code of Federal Regulations* (CFR) Part 52, "Licenses, Certifications and Approvals for Nuclear Power Plants." The NRC staff is performing a detailed review of this application to enable the staff to reach a conclusion regarding the environmental impacts of the proposed action.

The NRC staff has identified that additional information is needed to continue portions of the environmental review. The staff's request for additional information (RAI) is contained in the enclosure to this letter.

To support the review schedule, you are requested to respond within 45 days of the date of this letter. If you are unable to provide a response within 45 days, please state when you will be able to provide the response. In the event the response submitted is incomplete, please indicate in the response when the complete response will be provided. If changes are needed to the ESP application, the staff requests that the RAI response include the proposed wording changes. Your response should also indicate whether any of the information provided is to be withheld as exempt from public disclosure pursuant to 10 CFR 2.390.

If you have any questions or comments concerning this matter, you may contact me at 301-415-1488 or via e-mail at Tomeka.Terry@nrc.gov.

Sincerely,

/RA/

Tomeka Terry, Environmental Project Manager
Environmental Projects Branch 2
Division of New Reactor Licensing
Office of New Reactors

Docket No. 52-042
eRAI Tracking Nos. 6461-6462 and 6510-6511

Enclosure:
As stated

cc: w/enclosure see next page

If you have any questions or comments concerning this matter, you may contact me at 301-415-1488 or via e-mail at Tomeka.Terry@nrc.gov.

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Request for Additional Information
No. 6461 Revision 0

Victoria County Station ESP
Exelon Texas
Docket No. 52-042
SRP Section: ESP EIS 2.5 - Socioeconomics
Application Section: Part 3, Environmental Report (ER) Sections 2.5.1

QUESTIONS for Environmental Projects Branch 2 (EPB2)

ESP EIS 2.5-1

SE 2.5.1-1 ESRP Section 2.5.1 directs the staff to review the applicant's population data presented in the environmental report (ER). Population data were based on the 2000 census data throughout ER Section 2.5.1. Provide for the demographics within the region, more recent population data and estimates using verifiable sources such as the 2010 census and ACS data. Provide updated population estimates for ER Section 2.5.1.

SE 2.5.1-2 ESRP Section 2.5.1 directs the staff to review the applicant's transient population data presented in the ER. Transient populations should be updated to include current projects and investments. Such projects could include, but are not limited to, the Eagle Ford shale oil play, the new Caterpillar plant/facility, Caterpillar downstream manufacturing facilities, Invista plant reconfiguration, Port of Victoria expansion, hotel and residential housing development, and other major project workers in the ROI and 8-county area. Provide updated transient population estimates for ER Section 2.5.1.3.

SE 2.5.2.1-1 ESRP Section 2.5.2 directs the staff to review the applicant's employment and unemployment data presented in the ER. Update employment characteristics to recognize new local employment conditions with verifiable sources such as BLS, BEA, and local information for the ROI. Such information could include, but is not limited to, new employer characteristics at the Eagle Ford shale oil play, Invista plant reconfiguration, Caterpillar plant construction/operation, Caterpillar downstream manufacturing facilities, Port of Victoria expansion, hotel and residential housing development, and other major project workers for the ROI. Provide updated employment and unemployment information and projections for ER Section 2.5.2.1.

SE 2.5.2.2-1 ESRP Section 2.5.2 directs the staff to review the applicant's transportation/traffic data presented in the ER. Double-check numbers to make sure that all data is still accurate, including ongoing changes at the Port of Victoria. Add LOS to Table 2.5.2-7, Road Characteristics and Traffic Statistics, and a description to the narrative. Provide updated transportation/traffic information and projections for ER Section 2.5.2.2.

SE 2.5.2.3.4-1 ESRP Section 2.5.2 directs the staff to review the applicant's project site tax data presented in the ER. Provide additional information about the acreage, taxable value, location, and school district location for the two parcels that were added to the project site (see ER Table 2.5.2-19). Provide additional VCS site parcels and assessed value data for ER Section 2.5.2.3.4.

SE 2.5.2.5-1 ESRP Section 2.5.2 directs the staff to review the applicant's recreational use and availability data presented in the ER. Provide City, County, and ROI recreational facility and area use and availability data, if available. If not, indicate the jurisdictions where acres/1,000 population does not meet the standard selected as presented in ER table 2.5.2-33. Provide additional recreational use and availability data for ER Section 2.5.2.5.

SE 2.5.2.6-1 ESRP Section 2.5.2 directs the staff to review the applicant's hotel/motel and housing estimates and projections presented in the ER. The 2000 census housing data used to characterize number and types of units, vacancy, and adequacy of structures may no longer accurately reflect existing conditions. The staff assumes that housing data from organizations such as the regional planning organization (GCRPC), the Swearingen Report (Ron Brown Company – Caldwell Banker, September 2011), or other authoritative sources may provide more detailed information relative to the communities that could be affected by an influx of workers. Additional data relative to temporary lodging (hotels, motels, RV parks) would also be needed to assess potential impacts of the temporary construction workforce. Provide updated hotel/motel and housing estimates and projections for ER Section 2.5.2.6.

SE 2.5.2.7-1 ESRP Section 2.5.2 directs the staff to review the applicant's infrastructure and public services data presented in the ER. Provide updated information about the latest ROI infrastructure improvements (water, sewer, streets and other); new or additional water rights capacities and treatment plant upgrades; and police/fire/emergency response capabilities. Provide updated infrastructure and public services information for ER Section 2.5.2.7.

SE 2.5.2.8-1 ESRP Section 2.5.2 directs the staff to review the applicant's schools and higher education capabilities data presented in the ER. Provide updated information about the latest additions to school facilities, conversion of the University of Houston campus to a 4-year institution, and training programs in Victoria County and the surrounding ROI. Provide updated schools and higher education capabilities information for ER Section 2.5.2.8.

SE 2.5.2.8-2 ESRP Section 2.5.2 directs the staff to review the applicant's schools and higher education capabilities data presented in the ER. In correspondence from Exelon Generation on May 5, 2011 (NP-11-0015; D087 LIRO), updated information was provided indicating that the VCS site consists of 11 total parcels, with 9 of those parcels in the Refugio ISD and 2 parcels in the Victoria ISD. Although this topic is discussed in the ESP ER Section 2.5.2.3.5, updated pertinent information and discussions about funding issues for the Refugio ISD and Victoria ISD should also be provided in ESP ER Sections 2.5.2.8.1.5 and 2.5.2.8.1.6. The ESP ER Section 4.4.2.2.2 (page 4.4-26) indicated that the power block would be located in the Victoria ISD, but discussions with local leaders during the Site Audit indicated that the power block would be located in the Refugio ISD. Confirm the proposed location of the power block and describe Victoria ISD's "property-poor" (Chapter 42) property tax revenue status and Refugio ISD's "property-wealthy" (Chapter 41) status in Section 2.5.2.8, as a baseline for understanding later impact analyses. Provide additional school/education information for ER Section 2.5.2.8.

SE 2.5.4-1 ESRP Section 2.5.4 directs the staff to review the applicant's environmental justice minority and low-income population data presented in the ER. Provide updated Census Block Group (CBG) population information for minority and low-income populations using the 2010 Census data, ACS and/or other current sources. Provide updated environmental justice minority and low-income population information for ER Section 2.5.4

Request for Additional Information
No. 6462 Revision 0

Victoria County Station ESP
Exelon Texas
Docket No. 52-042
SRP Section: ESP EIS 4.4 - Socioeconomic Impacts
Application Section: Part 3, Environmental Report (ER) Sections 4.4.2 and 4.4.3

QUESTIONS for Environmental Projects Branch 2 (EPB2)

ESP EIS 4.4-1

SE 4.4.2-1 ESRP Section 4.4.2 directs the staff to review the applicant's worker in-migration population data presented in the ER. Provide support for the 95% in-migration assumption, and some additional narrative to ER Section 4.4.2 to support the assumption. Provide additional worker in-migration information for ER Section 4.4.2.

SE 4.4.2-2 ESRP Section 4.4.2 directs the staff to review the applicant's construction cost data presented in the ER. Verify the range of plant construction costs assumptions to conduct the impact analyses. Provide additional construction cost information for ER Section 4.4.2.

SE 4.4.2-3 ESRP Section 4.4.2 directs the staff to review the applicant's tax revenue data presented in the ER. Verify the tax impacts calculations, add an estimate of worker property tax contributions, and add footnotes or revise titles as appropriate to facilitate understanding of jurisdictional tax revenues addressed by the presented data. Provide additional tax revenue information for ER Section 4.4.2.

SE 4.4.2-4 ESRP Section 4.4.2 directs the staff to review the applicant's potential construction workforce residence distribution data presented in the ER. Conduct, or provide a previous analysis, to identify where the construction workforce would likely reside in the ROI at the county level. Provide an existing model or prepare a new model for construction workforce distribution (for example a gravity model). Re-evaluate impacts as needed based upon that analysis. Provide additional information about potential construction workforce residence distribution for ER Section 4.4.2.

SE 4.4.3-1 ESRP Section 4.4.3 directs the staff to review the applicant's minority population potential impacts presented in the ER. Provide additional discussion and analysis about the potential minority population impacts from Highway 77 bordering the Hispanic CBG, and potential impacts from construction related traffic. Provide additional information about minority population potential impacts for ER Section 4.4.3.

Request for Additional Information
No. 6510 Revision 0

Victoria County Station ESP
Exelon Texas
Docket No. 52-042
SRP Section: ESP EIS 5.4 - Socioeconomic Impacts
Application Section: Part 3, Environmental Report (ER) Section 5.8.2 and Section 5.8.3

QUESTIONS for Environmental Projects Branch 2 (EPB2)

ESP EIS 5.4-1

SE 5.8.2-1 ESRP Section 5.8.2 directs the staff to review the applicant's potential operational workforce residence distribution impacts presented in the ER. Conduct, or provide a previous analysis, to identify where the construction workforce would likely reside in the ROI at the county level. Provide an existing model or prepare a new model for operational workforce distribution (for example a gravity model). Re-evaluate impacts as needed based upon that analysis. Provide additional information about potential operational workforce residence distribution for ER Section 5.8.2.

SE 5.8.3-1 ESRP Section 5.8.3 directs the staff to review the applicant's minority population potential impacts presented in the ER. Provide additional discussion and analysis about the potential minority population impacts from Highway 77 bordering the Hispanic CBG, and potential impacts from operations related traffic. Provide additional information about minority population potential impacts for ER Section 5.8.3.

Request for Additional Information
No. 6511 Revision 0

Victoria County Station ESP
Exelon Texas
Docket No. 52-042
SRP Section: ESP EIS 7.4 - Socioeconomics and Environmental Justice
Application Section: Part 3 Environmental Report (ER) Section 5.11

QUESTIONS for Environmental Projects Branch 2 (EPB2)

ESP EIS 7.0-1

SE 5.11-1 ESRP Section 5.11 directs the staff to review the applicant's impact information about cumulative projects occurring and proposed in the ROI and 8-County area presented in the ER. The section should be updated to include past, present, and reasonably foreseeable projects. Examples include, but are not limited to, the Eagle Ford shale oil/gas fracking, Caterpillar new plant/facility, Caterpillar downstream manufacturing facilities, Invista plant reconfiguration, Port of Victoria expansion, hotel and residential housing development, Port Comfort Plastics Plant, the potential new STP nuclear power plant, and other reasonably foreseeable major project workers in the ROI and 8-county area. Provide additional impact information about cumulative projects occurring and proposed in the ROI and 8-County area for ER Section 5.11.

SE-5.11.2 ESRP Section 5.11 directs the staff to review all of the applicant's correspondence and documentation of personal communications used to support the cumulative impact analysis presented in the ER. The projects that were considered in determining that cumulative impacts would be SMALL were very limited in ER Section 5.11. Provide copies of all correspondence and documentation of personal communications used to support the cumulative impact analysis presented in the ER, including, but not limited, to discussions with local government authorities on current or future activities/projects (public or private) in the vicinity of the VCS site for ER Section 5.11.