

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. 14 RELATED TO METEOROLOGY & AIR QUALITY FOR
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. However, your staff has requested the following response times for each question:

<u>45 days</u>	<u>60 days</u>
MET-1	MET-2
MET-5	MET-3
	MET-4
	MET-6

If you are unable to provide a response within 45 or 60 days, as applicable, 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.

M. Kray

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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 No. 6453

Enclosure:
As stated

cc: w/enclosure see next page

M. Kray

- 2 -

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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Enclosure:
As stated

cc: w/enclosure see next page

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ADAMS Accession Number: ML12152A194

NRO-002

OFFICE	NRO/DNRL/ LA	NRO/DNRL/EPB2/ PM
NAME	ARedden	TTerry*
DATE	05/29/2012	05 /31/2012

* Approval captured electronically in the electronic RAI system.

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Draft Request for Additional Information
No. 6453 Revision 0

Victoria County Station ESP
Exelon Texas
Docket No. 52-042
SRP Section: ESP EIS 2.9 - Meteorology and Air Quality
Application Section: Part 3, Environmental Report (ER) Section 2.7

QUESTIONS for Environmental Projects Branch 2 (RAP2)

ESP EIS 2.9-1

MET-1 - ESRP Section 2.7 directs the staff to review the applicant's meteorological monitoring program for obtaining data that are representative of the site. Section 2.7 (page 2.7-6) states "at least one annual cycle from the onsite meteorological program should be used to relate local meteorological conditions to local and regional climatology". In order to determine if the measurements taken at the VCS site are representative of the weather in the region, the NRC staff requests that the applicant provide annual and seasonal wind roses for Victoria National Weather Service (NWS) station for the same 2-year period as the onsite meteorological data, for comparison to the 10-meter onsite wind data. Provide annual and seasonal wind roses for Victoria NWS station for the same 2-year period as the onsite meteorological data.

MET-2 -NRC Supplemental Staff Guidance in NUREG-1555 (Agencywide Documents and Access Management System (ADAMS) at Accession No. ML100990185) directs the staff to review the applicant's discussion of climate change. During the site audit, a request for a discussion of climate change revealed that such a statement was included in Section 2.3.1.7 in the VCS SSAR. For completeness this discussion should also be included in the ER. Provide a climate change statement in the ER.

MET-3 - NRC Supplemental Staff Guidance in NUREG-1555 (Accession No. ML100990204) directs the staff to review the analysis for reactor applications to ensure that the applicant has evaluated emissions from the uranium fuel cycle as well as from construction and operation of the facility to be licensed. The environmental report (ER) contains no discussion of expected air quality emissions Greenhouse Gases (GHG) in terms of CO₂ emissions associated with construction activities. Emissions should be quantified, including for example those related to providing fill, (i.e., trucking of fill to raise the elevation of the power block area), for the VCS site and each alternative site. Quantify all GHG emissions associated with construction activities at the VCS site and each alternative site.

MET-4 - NRC Supplemental Staff Guidance in NUREG-1555 (Accession No. ML100990271) and ESRP Section 4.7 direct the staff to review the applicant's cumulative impacts analysis in all resource areas. The ER contains no discussion of air quality cumulative impacts in Section 4.7 and Table 4.7-1. Cumulative air quality impact analysis associated with the proposed project when considered in the context of other past, present, and reasonably foreseeable future actions should be addressed in ER. Provide a discussion of air quality cumulative impacts.

MET-5 - ESRP Section 3.6.3 directs the staff to review the applicant's description of miscellaneous gaseous effluents released to the atmosphere. The ER Section 3.6.3 includes a discussion of ancillary equipment and provides emissions for all, but the fire pump. Table 3.6-2 should include diesel fire pump emissions. Provide diesel fire pump emissions.

Enclosure

MET-6 - NRC Supplemental Staff Guidance in NUREG-1555 (Accession No. ML100990185) directs the staff to review the applicant's GHG analysis. The ER contained a short discussion of GHG in Section 5.8.1.2 based on operations at other Exelon Nuclear plants. It is not clear that these operational estimates were made following the guidance in the NRC Supplemental Staff Guidance in NUREG-1555 (Accession No. ML100990185). There is also a requirement to include a GHG analysis for not only operation, but also for construction and decommissioning. The ER Section 4.4.1.3 briefly mentions GHG due to construction of a typical nuclear power plant, but this should be coupled with site specific construction activities with estimates made following the guidance which can be found in ADAMS (Accession No. ML100990185). Perform and provide GHG analysis.