

## PMVictoriaESPPEm Resource

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**From:** Terry, Tomeka  
**Sent:** Friday, May 18, 2012 11:45 AM  
**To:** Joshua.Trembley@exeloncorp.com  
**Cc:** Hendrick, Elizabeth; Quinlan, Kevin; Avci, Halil I.; Wescott, Konstance L.  
**Subject:** Victoria Draft Meteorology/Air Quality  
**Attachments:** Meteorology and Air Quality RAI 6453.doc

JT,

Attached is draft Meteorology and Air Quality RAIs. If you have any questions, please let me know.

Thanks!  
Tomeka

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**From:** Terry, Tomeka

**Created By:** Tomeka.Terry@nrc.gov

**Recipients:**

"Hendrick, Elizabeth" <ehendrick@Epsilonassociates.com>

Tracking Status: None

"Quinlan, Kevin" <Kevin.Quinlan@nrc.gov>

Tracking Status: None

"Avci, Halil I." <avci@anl.gov>

Tracking Status: None

"Wescott, Konstance L." <wescott@anl.gov>

Tracking Status: None

"Joshua.Trembley@exeloncorp.com" <Joshua.Trembley@exeloncorp.com>

Tracking Status: None

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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 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 (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 (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 ER contains no discussion of expected air quality emissions of criteria pollutants and Greenhouse Gases in terms of CO<sub>2</sub> 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 air quality emissions (criteria and GHG) associated with construction activities at the VCS site and each alternative site.

MET-4 - NRC Supplemental Staff Guidance in NUREG-1555 (ML100990271) and ESRP Section 4.7 directs 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.

MET-6 - NRC Supplemental Staff Guidance in NUREG-1555 (ML100990185) directs the staff to review the applicant's Greenhouse Gas (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 (ML100990185). There is also a requirement to include a GHG analysis for not only operation, but also for construction and decommissioning. 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 in ML100990185. Perform and provide GHG analysis.

DRAFT