



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

February 15, 2013

Mr. D. W. Rencurrel
Chief Nuclear Officer
STP Nuclear Operating Company
P.O. Box 289
Wadsworth, TX 77483

SUBJECT: REQUESTS FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE
SOUTH TEXAS PROJECT LICENSE RENEWAL APPLICATION

Dear Mr. Rencurrel:

By letter dated October 25, 2010, STP Nuclear Operating Company submitted an application pursuant to Title 10 of the *Code of Federal Regulations* (CFR) Part 54, to renew the operating licenses NPF-76 and NPF-80 for South Texas Project. The U.S. Nuclear Regulatory Commission staff is reviewing the information contained in the license renewal application and has identified, in the enclosure, areas where additional information is needed to complete the review.

These requests for additional information were discussed with Mr. Kenneth Taplett of your staff, and a mutually agreeable date for the response is within 30 days from the date of this letter. If you have any questions, please contact me at 301-415-3617 or by e-mail at Tam.Tran@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Tam Tran", is written over a horizontal line.

Tam Tran, Environmental Project Manager
Projects Branch 2
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosure:
Requests for Additional Information

cc w/encl: Listserv

SOUTH TEXAS PROJECT
LICENSE RENEWAL APPLICATION
REQUESTS FOR ADDITIONAL INFORMATION

Background

On January 15, 2013, the U.S. Nuclear Regulatory Commission (NRC or the staff) held two public meeting sessions on the NRC's Supplement 48 to NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants" (SEIS), regarding the license renewal of South Texas Project (STP). During the evening session, a member of the public had a comment concerning wildlife management on the STP site. Consistent with 10 CFR 51.91(a)(1) and the staff's review criteria in the Standard Review Plan, the staff requests additional information to complete its review.

Issue

The staff does not have sufficient information to verify the accuracy of the comments concerning wildlife management at STP. The comments are reproduced below from the transcript:

I want to thank the NRC staff for traveling all this way and giving us an opportunity to participate in this process.

I'm a Matagorda County native and a business person here locally and a state-licensed wildlife rehabilitator. I live on a 65-acre ranch in Blessing, about eight miles from STP, and I run an animal sanctuary there as well.

I really appreciate the opportunity to come and be heard during this scoping process. I believe that accountability, transparency, and the right to challenge industry are very important and that to question is every citizen's duty. I have several areas of this EIS that I would like to fundamentally disagree with and respectfully ask you to reconsider.

I continually see and hear that STP is lauded as beneficial to local wildlife and habitat, and that angle is accepted and incorporated into the EIS. This is not what I see as a local citizen and one of only three licensed wildlife rehabilitators here in our county.

I see a large corporation doing a great job of showing you and the public the good and beneficial-to-them part of the picture.

In reality, the contract granted by STP to deal with wildlife issues goes to the lowest bidder, currently GCA. GCA, as well as previous environmental contractors, requires its employees to destroy bird nests, eggs, and infant birds that nest on the site as part of standard housekeeping.

These employees receive no training in applicable laws such as the Migratory Bird Treaty Act, no training on species identification, and don't even know what kind of avian life they're destroying.

ENCLOSURE

One year ago this week STP initiated a nuisance-bird eradication program, whereby seed was set out for several days in a row to establish feeding stations on site, and then the seed was replaced with poison.

This project was aimed primarily at several protected species of grackles that congregate in large numbers to overwinter on the Texas Gulf Coast. The poisons that are used are neurotoxic, and the animals that ingest them die a horrible death, often beating themselves to death on the ground.

Predator species such as hawks, eagles, and owls are drawn to the activity and, by ingesting the tainted birds, they ingest the poisons as well. These are biocumulative in the food chain.

I got calls about several raptors on and around the STP site that week that were acting abnormally. One red-tail hawk was brought to my facility but could not be saved.

I emailed STP authorities before this poisoning took place and asked them to consider other options. They did not reply to my email, which is attached; I'll leave my comments here.

There are much more humane ways to keep the site free of unwanted birds, short of killing them, though maybe none so inexpensive. These kinds of activities must be considered in the scoping process, and we must acknowledge that fact, that profit supersedes environmental concerns.

STP also regularly deals with mammals on site with lethal solutions, and when problem animals are relocated, employees lack the training to recognize disease which may be infectious, and they are not trained on the laws that pertain especially to our fur-bearing species.

Our wildlife rehabilitation group has offered training to STP personnel at no expense but were told and I quote "We are not ready to take it to that level." Additionally, STP regularly kills entire bee colonies that swarm on site. Honeybee numbers are in serious decline, and most of our food crops depend on their pollination.

Request

The staff requests information that addresses the validity of the comments reproduced above in their entirety, and to include the following information:

- Provide information on how STP Nuclear Operating Company (STPNOC) ensures groundskeepers and wildlife management workers or contractors receive adequate training in applicable laws such as the Endangered Species Act, the Migratory Bird Treaty Act, and the Bald and Golden Eagle Protection Act. Include information on how STPNOC ensures

that workers or contractors are trained and knowledgeable in identification of protected species that are likely to occur on the South Texas site.

- If State- or Federally protected species are identified on the site during grounds maintenance, what procedures do workers or contractors follow to ensure compliance with applicable statutes?
- Does STPNOC or its contractors remove or destroy any bird nests, eggs, or infant birds as part of site maintenance? Provide a description of the procedure that STPNOC or its contractors follow for such activities. Include a description of any coordination with State or Federal agencies that would take place.
- Clarify whether or not STPNOC has a "nuisance-bird eradication program." If such a program exists, please provide a description of the program and any information addressing the issues raised in the comments above, concerning the use of neurotoxins, targeting of protected grackle species, and indirect impacts to raptor species.
- Provide a description of any wildlife management procedures or protocol related to mammals on site. Provide information addressing the issues raised in the comments concerning killing and relocating mammals and lack of employee training.
- Provide information addressing the issue raised in the comments concerning killing bee colonies on the South Texas site. If this activity occurs, please provide details on the species targeted, the method of targeting, and any associated monitoring.
- Provide any available information on STPNOC's past or current coordination or contact with State and Federal wildlife agencies for any on-site wildlife management activities.

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/RA/

Tam Tran, Environmental Project Manager
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NAME	IKing	TTran	MWong	DWrona (EKeegan for)
DATE	2/11/13	2/13/13	2/13/13	2/15/13

OFFICIAL RECORD COPY

Letter to D. W. Rencurrel from T. Tran dated February 15, 2013

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