



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

May 7, 2013

Ms. Wendi Weber
Northeast Regional Director
U.S. Fish and Wildlife Service
300 Westgate Center Drive
Hadley, MA 01035-9589

SUBJECT: REQUEST FOR CONCURRENCE ON THE EFFECTS OF THE PROPOSED
LIMERICK GENERATING STATION, UNITS 1 AND 2, LICENSE RENEWAL
ON THREATENED AND ENDANGERED SPECIES

Dear Ms. Weber:

With this letter, and in accordance with the Endangered Species Act of 1973, as amended (ESA), the U.S. Nuclear Regulatory Commission (NRC) requests your concurrence with NRC's determination that the proposed license renewal of Limerick Generating Station, Units 1 and 2 (Limerick), is not likely to adversely affect any Federally listed or proposed species or critical habitat under the U.S. Fish and Wildlife's (FWS's) jurisdiction.

Project Summary

Limerick is located in Limerick Township of Montgomery County, Pennsylvania, approximately 20 miles northeast of Philadelphia. Limerick is a two-unit nuclear-powered steam electric generating facility that uses a cooling tower-based heat-dissipation system.

The NRC's Federal action is the decision whether to renew the Limerick operating licenses for an additional 20 years of operation. Limerick's current operating licenses expire in 2024 (Unit 1) and 2029 (Unit 2). If approved, the license renewal would allow Limerick to operate Units 1 and 2 through 2044 and 2049, respectively. The NRC considered the remainder of the current operating license term as well as the renewed operating license term in its analysis of effects to Federally protected species and habitats.

The Limerick site is approximately 645 acres in size and consists of property in both Montgomery and Chester Counties. Limerick buildings, parking lots, support facilities, and other infrastructure occupy about 270 acres of the site. The remaining land consists of lowland riparian and upland forest; fields; agricultural land; and palustrine forested and emergent wetlands. The site is surrounded by gently rolling countryside and farmland with several valleys containing tributary drainages of the Schuylkill River.

Limerick withdraws cooling water from and discharges cooling water to the Schuylkill River, the plant's primary water source, via the Schuylkill Pumphouse located on the eastern bank of the river on the Limerick site. During periods of low river flow, Limerick secondarily relies on water from Perkiomen Creek. Withdrawing water from Perkiomen Creek often requires augmentation of flow via an intrabasin transfer of water from the Delaware River. A series of pumping stations delivers Delaware River water from the Point Pleasant Pumping Station via pipeline to the

Bradshaw Reservoir, which is then delivered via pipeline to the East Branch Perkiomen Creek. Water ultimately flows from the East Branch Perkiomen Creek to the Perkiomen Creek.

Section 7 Consultation History

In a letter dated September 8, 2011, and in accordance with section 7 of the ESA, the NRC requested that the FWS provide NRC with a list of ESA-protected species and critical habitats that may be in the vicinity of Limerick and its associated transmission line corridors. On November 22, 2011, the FWS Pennsylvania Field Office responded to NRC's request. In its response, the FWS noted that the Limerick site lies within the known range of the Federally threatened bog turtle (*Clemmys muhlenbergii*). However, the FWS also indicated that the proposed license renewal would not affect the bog turtle.

Request for Concurrence with the NRC's ESA Effect Determinations

Since the time of the correspondence discussed above, the NRC has performed an assessment of whether the proposed license renewal of Limerick has the potential to adversely affect the bog turtle or other Federally listed or proposed species or critical habitats. This assessment is documented in Sections 2.2.8 and 4.8 of the enclosed draft Supplement 49 to NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants" (SEIS), regarding the license renewal of Limerick. The assessment includes six Federally listed species, four of which are under the FWS's jurisdiction. The NRC staff did not identify any proposed species or proposed or designated critical habitat within the action area.

In the draft SEIS, the NRC staff concluded that continued operation of Limerick during the license renewal term **may affect, but is not likely to adversely affect** three Federally listed species under the FWS's jurisdiction—the bog turtle, the Indiana bat (*Myotis sodalist*), and the small-whorled pogonia (*Isotria medeoloides*). The NRC staff concluded that the license renewal would have **no effect** on the dwarf wedgemussel (*Alasmidonta heterodon*). Per the ESA regulations at 50 CFR 402.06, the NRC considers the SEIS to constitute a biological assessment. Thus, the staff did not prepare a separate biological assessment as part of its National Environmental Policy Act (NEPA) review.

With this letter, we are requesting FWS's concurrence with the staff's effect determinations under section 7 of the ESA. In reaching our conclusions, the NRC staff relied on information provided by the applicant, on analysis performed by NRC staff, and on information from FWS.

Request for NEPA Comments on Draft SEIS

As indicated above, the NRC is also performing a NEPA review for the proposed Limerick license renewal. The NRC prepared the enclosed draft SEIS in accordance with 10 CFR Part 51, the NRC's regulation that implements NEPA, and is now seeking comments on the document through June 27, 2013. During the draft SEIS comment period, the NRC staff plans to hold two public environmental meetings at the Sunnybrook Ballroom, 50 North Sunnybrook Road, Pottstown, PA 19464-2946, on May 23, 2013, at 2:00 p.m. and 7:00 p.m. I invite you and your staff to both attend the public meetings and to submit comments on the draft SEIS. See the enclosed Federal Register notice or go to <http://www.Regulations.gov> and search for documents filed under Docket ID NRC-2011-0166 for additional information on the NEPA process and on how to submit draft SEIS comments.

W. Weber

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If you have any questions regarding the staff's request, please contact Ms. Briana Grange, biologist, at 301-415-1042 or by e-mail at briana.grange@nrc.gov.

I have also forwarded a copy of this letter to Mr. Clinton Riley, Field Office Supervisor, of your Pennsylvania Field Office. Mr. Riley responded to NRC's last letter regarding Federally listed species and habitats at Limerick.

Sincerely,

A handwritten signature in black ink that reads "Melanie C Wong". The signature is written in a cursive, flowing style.

Melanie C. Wong, Chief
Environmental Review
and Guidance Update Branch
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

Enclosure:
As stated

cc w/encl: Listserv

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W. Weber

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I have also forwarded a copy of this letter to Mr. Clinton Riley, Field Office Supervisor, of your Pennsylvania Field Office. Mr. Riley responded to NRC's last letter regarding Federally listed species and habitats at Limerick.

Sincerely,

/RA/

Melanie C. Wong, Chief
Environmental Review
and Guidance Update Branch
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

Enclosure:
As stated

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Letter to W. Weber from M. Wong dated May 7, 2013

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ON THREATENED AND ENDANGERED SPECIES

DISTRIBUTION:

HARD COPY:

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Pennsylvania Field Office Supervisor
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