

## BellBendEnveRAIPEm Resource

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**From:** Terry, Tomeka  
**Sent:** Friday, January 10, 2014 8:52 PM  
**To:** Rocco R. Sgarro (rrsgarro@pplweb.com)  
**Cc:** Mcdowell, Bruce K (Bruce.Mcdowell@pnnl.gov); 'Leigh, Kimberly D'; Becker, James M (james.becker@pnnl.gov); Doub, Peyton; Quinn-Willingham, Laura; BellBendEnveRAIPEm Resource  
**Subject:** Final RAI ENV-25  
**Attachments:** RAI ENV-25 Terrestrial Ecology.pdf

Rocky,

Attached is the final RAI ENV-25 for the Bell Bend COL application. The ENV-25 RAI is related to terrestrial ecology.

The NRC assumes technically correct and complete responses within 30 days of receipt of the final RAIs. For any RAIs that cannot be responded to within 30 days, it is expected that a date for receipt of this information will be provided to the staff within the 30-day period so that the staff can access how this information might impact the schedule. Please contact me if you have any questions.

Thanks!

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**From:** Terry, Tomeka

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## **Request for Additional Information No. 7339**

Issue Date: 1/10/2014

Application Title: Bell Bend Environmental Review Docket Number 52-039

Operating Company: PPL Bell Bend LLC.

Docket No. 52-039

Review Section: EIS TE - Ecology/Terrestrial

Application Section: Part 3 – Environmental Report

### QUESTIONS

ESRP Section 4.3.1 directs the staff's description, quantification, and assessment of the impacts of construction of the proposed facilities on the terrestrial ecosystem, and directs staff to describe mitigative actions. The response to information need TE-19 provided May 15-17, 2012 states that "Compensatory wetland mitigation will be primarily in-kind, providing for the same types of habitats to be created as are lost." The response also states that, ".....emergent wetlands will be replaced in part by forested wetlands due to site-specific habitat creation goals." From these statements, it is unclear whether any permanently affected emergent wetlands would be mitigated in-kind or whether they all would be mitigated out-of-kind (i.e., replaced by forested wetlands). State the mitigation method(s) (including out-of-kind and in-kind replacement) by which all permanent impacts to emergent wetlands would be mitigated and the acreage(s) for each.

## **Request for Additional Information No. 7340**

Issue Date: 1/10/2014

Application Title: Bell Bend Environmental Review Docket Number 52-039

Operating Company: PPL Bell Bend LLC.

Docket No. 52-039

Review Section: EIS TE - Ecology/Terrestrial

Application Section: Part 3 – Environmental Report

### QUESTIONS

ESRP Section 4.3.1 directs the staff's description, quantification, and assessment of the impacts of construction of the proposed facilities on the terrestrial ecosystem, and directs staff to describe actions to mitigate those impacts. The Joint Permit Application Mitigation Narrative states that, "After installation all temporarily impacted wetlands will be restored to their original grade and will be seeded with a wetland mix." The JPA Mitigation Narrative also states that, "Temporarily impacted palustrine emergent wetlands will recover their functions and values post construction." It is unclear whether there will be any temporarily affected palustrine forested PFO wetlands and associated restorative mitigation. Identify any temporarily affected PFO wetlands and describe associated restorative mitigation. Describe also the difference in mitigation strategy and the expected time to functional recovery between temporarily affected forested wetlands versus emergent wetlands.

## **Request for Additional Information No. 7341**

Issue Date: 1/10/2014

Application Title: Bell Bend Environmental Review Docket Number 52-039

Operating Company: PPL Bell Bend LLC.

Docket No. 52-039

Review Section: EIS TE - Ecology/Terrestrial

Application Section: Part 3 – Environmental Report

### QUESTIONS

ESRP Section 2.4.1 directs the staff's description of the terrestrial and aquatic environments and biota at and in the vicinity of the site, as well as other areas likely to be impacted by the construction, operation or maintenance of the proposed project. ER Rev. 4 Tables 4.6-1 and 10.1-1 reference a historic survey database to identify important terrestrial species. Provide a copy of the historic survey database.

## **Request for Additional Information No. 7343**

Issue Date: 1/10/2014

Application Title: Bell Bend Environmental Review Docket Number 52-039

Operating Company: PPL Bell Bend LLC.

Docket No. 52-039

Review Section: EIS TE - Ecology/Terrestrial

Application Section: Part 3 – Environmental Report

### QUESTIONS

ESRP Section 4.3.1 directs the staff's description, quantification, and assessment of the impacts of construction of the proposed facilities on the terrestrial ecosystem. ER Rev. 4 Table 10.1-1 references management of forest habitat removal specific to key bird species to limit habitat fragmentation. Describe how removal of forest habitat would be managed for key bird species to limit habitat fragmentation. Identify the key bird species.

## **Request for Additional Information No. 7344**

Issue Date: 1/10/2014

Application Title: Bell Bend Environmental Review Docket Number 52-039

Operating Company: PPL Bell Bend LLC.

Docket No. 52-039

Review Section: EIS TE - Ecology/Terrestrial

Application Section: Part 3 – Environmental Report

### QUESTIONS

ESRP Section 6.5.1 directs the staff's description and evaluation of pre-application, site preparation and construction, preoperational, and operational monitoring programs. ER Rev. 4 Table 6.7-5 states that "Management plans will be prepared that aim to enhance or at least perpetuate the habitat for target species" during the pre-application phase of the project. Provide copies of the plans prepared for important target species during the pre-application phase of the project.

## **Request for Additional Information No. 7345**

Issue Date: 1/10/2014

Application Title: Bell Bend Environmental Review Docket Number 52-039

Operating Company: PPL Bell Bend LLC.

Docket No. 52-039

Review Section: EIS TE - Ecology/Terrestrial

Application Section: Part 3 – Environmental Report

### QUESTIONS

ESRP Section 4.3.1 directs the staff's description, quantification, and assessment of the impacts of construction of the proposed facilities on the terrestrial ecosystem. ER Rev. 4 Table 10.1-1 references restoration of available old field habitat not affected by the project. Identify the old field habitat that would be restored, restoration methods that would be employed, restoration goals, and the methods that would be used to maintain the restored old fields.



## **Request for Additional Information No. 7347**

Issue Date: 1/10/2014

Application Title: Bell Bend Environmental Review Docket Number 52-039

Operating Company: PPL Bell Bend LLC.

Docket No. 52-039

Review Section: EIS TE - Ecology/Terrestrial

Application Section: Part 3 – Environmental Report

### QUESTIONS

ESRP Section 4.3.1 directs the staff's description, quantification, and assessment of the impacts of construction of the proposed facilities on the terrestrial ecosystem. ER Rev. 4 Section 4.6 and Tables 4.6-1 and 10.1-1 reference a Resource Management Plan that would be used to limit the adverse impacts of construction the terrestrial ecosystem. Provide a copy of the Resource Management Plan.

## **Request for Additional Information No. 7349**

Issue Date: 1/10/2014

Application Title: Bell Bend Environmental Review Docket Number 52-039

Operating Company: PPL Bell Bend LLC.

Docket No. 52-039

Review Section: EIS TE - Ecology/Terrestrial

Application Section: Part 3 – Environmental Report

### QUESTIONS

ESRP 5.6.1 directs the staff's identification and evaluation of impacts on the terrestrial ecosystem induced by the operation and maintenance of transmission systems. The response to RAI TE-31 (BNP-2012-211) (8/31/2012) indicates that vegetation maintenance activities that occur once every three years can be scheduled any time of year, except for tree cutting which can't be done between April and November due to the potential use of trees for roosting by the Indiana bat. The response doesn't include information on scheduling non-tree-cutting vegetation maintenance to reduce impacts on migratory birds. However, the response does state that PPL EU has both an Avian Protection Plan and an Avian Protection Procedure for transmission corridor vegetation maintenance activities, and that these documents demonstrate compliance with the Migratory Bird Treaty Act. Provide copies of the Avian Protection Plan and an Avian Protection Procedure.

## **Request for Additional Information No. 7350**

Issue Date: 1/10/2014

Application Title: Bell Bend Environmental Review Docket Number 52-039

Operating Company: PPL Bell Bend LLC.

Docket No. 52-039

Review Section: EIS TE - Ecology/Terrestrial

Application Section: Part 3 – Environmental Report

### QUESTIONS

ESRP Section 4.3.1 directs the staff's description, quantification, and assessment of the impacts of construction of the proposed facilities on the terrestrial ecosystem. PADEP Water Obstruction and Encroachment Permit, E40-720 (ML13161A023) identifies bridge removal as an impact associated with Joint Permit Application (JPA) Impact B (Wetlands 10 and 12). The JPA (environmental assessment Part 2 – Project Description, Part D – Project Impacts) describes wetland impacts associated with bridge construction under Impact B; however, the JPA does not describe wetland impacts from bridge removal. Provide information on potential wetland impacts associated with bridge removal under JPA Impact B. Indicate if, how, and to what extent these wetland impacts, if any, would differ from those associated with bridge construction under JPA Impact B (see Enclosures D3 and D4 in the JPA).