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December 3, 2013

Mr. Joseph Buczynski, P.E.
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**BELL BEND NUCLEAR POWER PLANT
JOINT PERMIT APPLICATION AND REQUEST
FOR WATER QUALITY CERTIFICATION, REV 1
ERRATA
BNP-2013-161 Docket No. 52-039**

Reference: BNP-2011-207, R. R. Sgarro (PPL Bell Bend, LLC) to J. Buczynski, PADEP,
and A. Elliott, USACE, Joint Permit Application and Request for Water Quality
Certification, Rev 1" dated November 21, 2011

This letter provides errata to certain portions of the Joint Permit Application and Request for Water Quality Certification, Rev. 1 (JPA), supplied in the referenced letter. The errata correct the acreage of upland forest impacted by the construction of the Bell Bend Nuclear Power Plant based on recent reviews by project personnel.

The Enclosure to this letter provides the markup of the affected portions of the JPA.

Should you have questions, please contact the undersigned at 610.774.7552.

Respectfully,

Rocco R. Sgarro

RRS/kw

Enclosure: Errata to JPA Rev. 1

cc: w/ Enclosure

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w/o Enclosure

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Enclosure

Errata to JPA Rev. 1

of the SRBC and is being separately addressed as part of the Commission's regulatory review.

2.5 Tree Removal Impacts

In addition to deforestation in wetlands, upland forested wildlife habitat will be significantly affected by BBNPP construction. Approximately ~~234 acres~~ of forest will be cleared, of which approximately ~~224.5 acres~~ is upland and 9.51 acres is wetland. Tree clearing will cause increased fragmentation of forested habitat. More specifically, tree clearing will impact potential Indiana bat habitat. The Indiana bat is a federally-listed endangered species.

232 acres

222.2 acres

2.6 Impacts to Threatened and Endangered Species and Species of Special Concern

Species that could potentially be impacted by the construction of the BBNPP include the Indiana bat and two mussel species (the Yellow Lampmussel and Green Floater), the Baltimore Checkspot butterfly and the Mulberry Wing butterfly. Tree clearing could decrease available roost tree habit for the Indiana bat. Although suitable habitat exists, the Indiana Bat has not been identified within the Project Boundary. Dredging in the NBSR for intake and blowdown line construction could affect the listed state protected mussel species. The Yellow Lampmussel is widely distributed and will not be affected by the limited area of disturbance needed for intake structure dredging. The green floater is more likely to be found in hydrologically stable streams, not those prone to flooding and drying. While the intake structure will be constructed in a calm pool, the depth and substrate in this area make impacts to Green Floater habitat unlikely. PPL is coordinating with the PA Fish and Boat Commission and will obtain clearance before dredging commences. Impacts to the Baltimore Checkerspot are unlikely because its host plant, turtlehead (*Chelone glabra*) was not found in the wetlands at the BBNPP site. Neither of these butterfly species has been sighted within the BBNPP project boundary.

remaining forest. A total of approximately ~~234 acres~~ of forested habitat will be cleared, of which ~~224.5 acres~~ are upland and 9.51 are wetland. Impacts from this activity include potential habitat disruption and loss of water quality, shading, and windbreak benefits supporting local wetland and upland habitat quality. The proposed clearing will increase the fragmentation of the existing forest cover. Forested buffers (50 foot minimum width) will be maintained adjacent to EV streams and wetlands, where possible, to protect these resources during construction and operation of the BBNPP, and to reduce the potential for any unintentional impacts.

232 acres

222.2 acres

The Indiana Bat is a federally endangered species with known hibernacula in the vicinity of the BBNPP site. No Indiana Bats were caught during bat mist surveys or acoustic monitoring completed within the project boundary. The Applicant is working with the U.S. Fish and Wildlife Service to minimize the risk of potential impacts and to develop a mitigation strategy. See Section E of this JPA for correspondence regarding the Indiana Bat.

Project impacts to the other protected species are expected to be minimal. Two protected mussel species were detected; one Green Floater was collected in the NBSR during macroinvertebrate studies and numerous Yellow Lampmussels were collected during a separate mussel survey. In addition, Pennsylvania Natural Diversity Index (PNDI) search results included two protected butterfly species which could be present within the project boundary. PPL has initiated dialogue with the appropriate State agencies to minimize and mitigate any potential impacts resulting from BBNPP construction and operation (see Section E).

Cultural resources on-site will be affected by extensive clearing and grading. In addition the NBC will be temporarily impacted by the intake and blowdown pipeline installations. PPL will continue to coordinate with the PHMC on cultural resource investigations. All cultural resource clearances will be obtained from PHMC prior to commencing work on BBNPP. See Section D of this JPA for correspondence to date regarding cultural resources. All Cultural Resource studies are provided in JPA Appendix C.

Table 4. Wetland Functions Impacted and Created or Enhanced

Wetland Function	Amount Impacted	Amount Created/Enhanced
PFO Wildlife Habitat	9.51 ac	14.60 ac
Fish Habitat	742 LF	2213 LF
Groundwater Recharge	0 ac	15.28 ac
Floodflow Alteration	0.98 ac	15.28 ac
Sediment Reduction	0 ac	15.28 ac
Sediment/Shoreline Stabilization	0 LF	2213 LF

The quantification of wetland values is more subjective. 0.98 ac of wetland will be impacted at the PPL Riverlands that provides the following values: education, recreation, uniqueness, and visual quality. The existing wetland at the impacted area is not easily accessible therefore the ability of the wetland to provide these values is weak. The proposed walking trail and NBC restoration will maximize these values by providing easy access for people to enjoy recreation, the educational and historical values of the wetland and canal and the aesthetics of the area.

6. Mitigation for Additional Project Impacts

6.1 Mitigation for Water Use Impacts

PPL has been working with the SRBC to determine a suitable method or combination of methods to mitigate BBNPP's proposed use of water from the NBSR during low flow periods. Mitigation may include a passby flow requirement and/or the release of water from existing or future PPL developed storage assets. PPL continues to actively work with SRBC on a mutually acceptable and beneficial plan but does not expect to finalize a mitigation plan for the BBNPP until 2012.

6.2 Upland Forest Clearing Mitigation Plan

PPL will reforest acreage both within and outside the site boundary to compensate for up to ~~234~~ ac of proposed forest clearing which includes 9.51 ac of PFO. PPL has identified priority areas for mitigation. Top priority includes the Walker Run mitigation site, crop fields north and east of Lake Took-A-While and west of the NBSR, and parcels on the east side of

232 ac

232 acres

222.2 acres

forest. Approximately ~~234 acres~~ of forested habitat will be cleared, of which ~~224.5 acres~~ are upland and 9.51 are wetland. Impacts from this activity include potential habitat disruption and loss of water quality, shading, and windbreak benefits supporting local wetland and upland habitat quality. The proposed clearing will increase the fragmentation of the existing forest cover. As part of mitigation activities an effort will be made to replant forested areas in strategic locations that will create forested corridors throughout the BBNPP property boundary. In addition, 50 foot (minimum) forested buffers will be maintained, to the greatest extent practicable, adjacent to EV streams and wetlands to protect these resources during construction and operation of the BBNPP and reduce the potential for any additional impacts. In addition, the extent of the forested buffers will be increased as part of the mitigation strategy and bat management strategy.

5.2.3 Impacts on Terrestrial Species of Concern

Through correspondence with state and federal agencies and in-field reconnaissance, the diverse upland habitats at the BBNPP site have been determined to potentially support several rare or protected terrestrial species, including the butterflies Baltimore Checkerspot (*Euphydryas phaeton*) and Mulberry Wing (*Poanes massasoit*), the Northern Cricket Frog (*Acris crepitans*), and the (state and federally listed) endangered Indiana bat (*Myotis sodalis*).

The state and federally protected Indiana bat is known to use hibernacula located within 10 miles of the BBNPP site. Based upon USFWS correspondence, the existence of these hibernacula, along with suitable habitat (wetlands, forests, and riparian areas), make the site suitable for use by this species. A Bat Roost Tree Survey confirmed suitable Indiana Bat habitat in areas proposed to be impacted by BBNPP construction. PPL is coordinating with the USFWS to ensure impacts to the Indiana bat are avoided through project design and provision of suitable on- and off-site mitigation.

Tree clearing will occur between November 15 and March 31 while bats are hibernating to avoid direct mortality during time periods when the bats could potentially be using the site. PPL will adopt design measures that are intended to avoid and minimize potential indirect impacts on Indiana bats due to habitat loss that may occur as a result of the construction of BBNPP. The effort to minimize habitat loss will be focused on wetland