

NRR-PMDAPEm Resource

From: Grange, Briana
Sent: Tuesday, June 24, 2014 1:25 PM
To: Finfera, Jennifer (jennifer_finfera@fws.gov)
Subject: RE: Davis Besse operating license renewal
Attachments: Toledo Edison 1980 - Bird Collision Study.pdf; NRC 1981 Letter regarding Bird Collision Study.pdf

Hi Jenny,

I was able to obtain a copy of Toledo Edison's 1980 bird mortality report, which documents the 1972-1979 surveys conducted at Davis-Besse. This report is attached as well as a 1981 letter from the NRC indicating that the NRC would no longer require Toledo Edison to conduct bird mortality surveys because the surveys had found "no significant adverse effect on bird populations."

Please let me know if you need any other references or if I can answer any other questions for you during your review of NRC's effect determinations for Federally listed species that could be affected by the proposed Davis-Besse license renewal.

Briana

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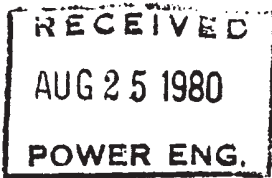
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Docket No. 50-346

License No. NPF-3

Serial No. 643

RICHARD P. CROUSE
Vice President
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(419) 259-5221

August 22, 1980

Director of Nuclear Reactor Regulation
Attention: Mr. Robert W. Reid, Chief
Operating Reactors Branch No. 4
Division of Operating Reactors
United States Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Reid:

Toledo Edison undertook several non-radiological environmental monitoring programs upon issuance of the Davis-Besse Nuclear Power Station, Unit 1 Operating License (NPF-3) on April 22, 1977. Details of these programs were identified in Section 3.1 of Appendix B to the License entitled "Environmental Technical Specifications".

A summary of the non-radiological environmental monitoring programs has been prepared which additionally includes the years of pre-operational studies. This enclosed summary, entitled "Environmental Impact Appraisal of the Davis-Besse Nuclear Power Station, Unit 1 on the Aquatic Ecology of Lake Erie 1973-1979" dated June 1980, clearly demonstrates that there has been no degradation of Lake Erie water quality as a result of operation of the Davis-Besse Station and that its operation has had no measurable deleterious effects on the Lake Erie ecosystem. This summary specifically addresses the following subjects:

<u>NPF-3 Appendix B Section No.</u>	<u>Subject</u>
3.1.1.a.1	Water Quality Analysis
3.1.2.a.1	Plankton Studies
3.1.2.a.2	Benthic Studies

In addition, results of the bird collision monitoring identified in Section 3.1.2.b.1 of Appendix B are summarized in the enclosed report, "Cooling Towers as Obstacles in Bird Migrations" dated November 15, 1979.

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This analysis shows that there has been no significant adverse effect on bird populations, either local or migratory, due to the presence of the cooling tower and other site structures.

These evaluations have fully defined the Davis-Besse Station operational impact on the environmental surroundings. Additional monitoring in the four specific areas mentioned above is, therefore, unnecessary. The associated programs are being terminated as of December 31, 1980. This notification and report summaries are consistent with Section 3.1 of our Environmental Technical Specifications.

Very truly yours,

R.P. Crouse / wgl

RPC:JSW:vlr

Enclosures - 14

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COOLING TOWERS AS OBSTACLES IN BIRD MIGRATIONS

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NOV 15 1979

*Serial 643
Enclosure 2*

COOLING TOWERS AS OBSTACLES IN BIRD MIGRATIONS

Summary

Observations of bird strike incidents at the Davis-Besse site, initiated in 1972, have been continued each spring and fall migration period. During these observations daily mortalities always have been less than 100. The maximum recorded (September 25, 1976) was 84, although some were floating in basin and may have come from the previous day. The highest number certainly recorded for a single day was 59 (May 17, 1974). The most birds recovered in a year was 515 (1974). In 1979 the total was 60. Almost 80% of the strikes occurred at the cooling tower.

Songbird species that are nocturnal migrants made up almost all of the bird strikes. Only occasionally were herons, grebes, coots, gallinules, gulls, and terns involved; and the many raptors, ducks, geese, and swans that abound in or migrate through the area have never been found. Although systematic observations during non-migratory periods have not been carried out, through scattered observations and circumstantial evidence, we believe that few summer and winter resident birds become strike victims.

Mortalities were more frequent with adverse weather, warm fronts and precipitation in the spring and passage of cold fronts in the fall. Most of the specimens had head injuries, indicative of frontal impact.

Lighting that reduced direct glare on the cooling tower and other structures but provided diffuse site illumination appeared

correlated with reduced bird strikes. The present sodium vapor lights seem to provide the best overall effect yet observed.

After seven years of observations, the cooling tower and other site structures are considered to have had no significant adverse effect on bird populations, either local or migratory.

Introduction

Tall, man-made structures, such as radio and television towers, monuments, smoke stacks, light houses and other buildings, are known to be lethal obstructions to migrating birds. Not only the tower itself, but the associated guy and electrical wires may cause injury or death to birds, especially the nocturnal migrants. A vast number of mortality reports have already emerged across the country, indicating the seriousness and extent of this problem.

Tall TV towers seem to be the most hazardous to avian migrants, causing losses up to 2000 birds in several nights during fall migration in Florida (Stevensen 1956, 1958). During an entire fall season 4900 birds were collected at a TV tower in Ontario (Hoskin 1975). Numbers occasionally reach as high as 30,000 birds, as reported from the TV tower at Eau Claire, Wisconsin for two nights in September 1963 (Kemper 1964). An extensive annotated bibliography on this subject has been compiled by Avery et al. (1978).

Information on mortalities at nuclear power plant structures are relatively scanty; monitoring programs have been initiated at only a few sites. Such observations have been undertaken at the Davis-Besse Nuclear Power Plant, where the number of bird kills was lower than reported for many TV towers. Observations also were begun at the four 370-foot cooling towers at Three Mile Island Nuclear Station on the Susquehanna River. During their preoperational

reporting period (1973 - 1974) mortalities were very low (37 specimens). Also during the 1974 - 1975 operational period, only 29 mortalities were reported (Pentecost and Muraka 1976; Mudge and Firth 1975). No detailed reports are known to be available from the Trojan Nuclear Power Plant situated near Portland, Oregon in the Columbia River Valley, which has a natural draft tower identical to that at the Davis-Besse Plant. Mortalities were reported by Dr. Stanley C. Katkansky, their ecologist, to be of little significance. Only occasional incidents at the tall stacks at Detroit Edison's Monroe, Michigan plant and the cooling tower at the nearby Fermi site have been reported (Jackson et al. 1977).

At the Davis-Besse Nuclear Power Plant on the SE shore of Lake Erie near Port Clinton, the shell of a large, natural-draft cooling tower (495 ft high, and 410 ft wide at the base) was constructed during 1972 and the spring of 1973. Regular observations and monitoring studies were carried out each subsequent spring and fall migration season. Results during the initial observation periods (fall 1972, spring and fall 1973) were summarized by Rybak et al. (1973).

The goals of this study were:

1. To study the bird-strike incidents during the pre-operational and operational periods.
2. To identify numbers of species and individuals affected at the different structures and buildings.
3. To determine through necropsy the extent of injury.
4. To evaluate the relationships between mortalities and weather patterns.

5. To determine the effects of site lighting on the number of mortalities.

Methods

At the Davis-Besse site, bird mortality has been monitored for the seventh consecutive spring and eighth fall migration seasons. The surveys consisted of almost daily, early-morning site visits in spring between mid-April and mid-June and in fall between the first of September and late October. The procedure included examination of the roof areas and the grounds around the reactor-turbine building complex and the base of the cooling tower.

Areas under major guy wires, transmission lines, a meteorological tower, a microwave tower, as well as around the cooling tower were inspected. All surveys included the recording of current environmental conditions, numbers and species of birds, and their locations. All birds collected were frozen for later necropsy.

Beginning in fall 1976, test runs involving the cooling tower operation occurred. The subsequent sloshing water in the tower base prevented determination of the locations of some mortalities, and an unknown number of birds drifted away through the water outlets. Many birds, however, were scooped up with a long-handle dip-net. Often some could be retrieved only after they had been drifting for several days and were badly decomposed, making detailed examinations difficult. However, with the help of a reference collection, it was possible to identify most of these carcasses.

Results and Discussions

During the mortality monitoring periods between fall 1972 and fall 1979, a total of 1561 bird carcasses were collected at the

Davis-Besse site. Of that total 1229 birds (78.7%) had collided with the cooling tower, 222 (14.2%) with the Unit I structures (turbine and reactor building), and 110 (7.0%) at the guy wires or the weather tower on the site (Table 1). Notable is that the majority of birds that collided with the tower were small songbirds (Passeriformes) (Table 2). Most were nocturnal migrating species, especially warblers (family Parulidae), vireos (Vireonidae), and kinglets (Sylviidae). Larger birds, such as the many waterfowl species that abound the adjacent marshes and ponds, virtually were not involved.

During the spring migrations, 483 carcasses (30.9%) were found, consisting mostly of warblers (55.7%), fringillids (10.4%), and "others", which included rails, thrushes, blackbirds, vireos, brown creepers, woodpeckers, and pigeons. Golden-crowned kinglets and ruby-crowned kinglets rarely were found in spring at the Davis-Besse structures (Fig. 1). Similar observations also were made at the Leon County, Florida TV-tower (Stoddard 1962 and Crawford 1973). Differential spring and fall migration patterns of these kinglets may be responsible for this phenomenon.

The most common warblers killed during the spring period 1972 through 1979 were the magnolia warbler (Dendroica magnolia) and yellowthroat (Geothlypis trichas), followed by Nashville warbler (Vermivora ruficapilla) (Table 3). Other warbler species were found in still smaller numbers over the years. In contrast, the Leon County, Florida TV-tower spring kills of the first two species were either small or almost nonexistent in contrast to greater kills in fall. At that tower, only one specimen of the Nashville warbler was found in October (Stoddard and Norris 1967).

The overall results of spring mortalities at the Davis-Besse plant reflect typical migration patterns and are, in contrast to fall patterns, spread more narrowly over only a few weeks. This is especially apparent with the magnolia warbler and the bay-breasted warbler (Dendroica castanea) (Fig. 2). Kills of red-eyed vireos (Vireo olivaceus) in spring were found to be almost as high as in fall (Fig. 2). A similar ratio was found at the Leon County, Florida TV-tower (Stoddard and Norris 1967).

In fall seasons after nesting, kills (1071 specimens [68.9%]) were more frequent because of larger numbers of birds migrating. Again warblers were the most affected (56.5%). Both species of kinglets (23.0%) were well represented (in contrast to the spring seasons), while numbers of mimids and finches were lower (Tables 1, 2, and 3). Late in the season both species of kinglets, magnolia warbler, yellowthroat, and the red-eyed vireo were found in relatively large numbers (Figs. 1, 2, and 3).

In the spring most birds (54%) were recovered in the NE sector of the cooling tower. This suggests that the birds striking the southern exposure of the tower may have drifted, while falling, with the southwesterly wind and/or other currents around the tower to the NE sector (Fig. 4A). The picture was reversed during the fall season, when most carcasses (52%) were found in the SE sector (Fig. 4B). Birds striking the tower from the north or northeast may have drifted with prevailing northwesterly winds around the tower to the more southeastern locations.

In general, mortality patterns and composition of species agreed with the results found by many other observers, who reported that warblers most frequently were killed at towers. Others also reported numerous kills of kinglets and often thrushes.

Necropsy Examination

Necropsy examination included determinations of the extent of hematoma under the skull, presence or absence of bone fractures (humerus, ulna, radius, tibiotarsus, and tarsometatarsus), bill damage, and "broken" neck and skulls. Each bird collected was aged by determining the degree of skull ossification. These data are summarized for the period from 1972 - 1979. Most frequent injuries were to the head and bill, indicating the occurrence of frontal impact (Table 4). Red-eyed vireos, however, suffered significantly less bill injuries than warblers and kinglets (paired t-test, $P < 0.001$).

Weather Patterns and Mortalities

Spring:

Past observations and analyses by W. A. Peterman have shown that bird mortalities tend to be related to low pressure systems, with migration occurring on the trailing edge of highs in advance of an oncoming cold front, with southerly wind flow. This synoptic weather pattern is often accompanied with warm front-type of precipitation, haze, low cloud ceiling, and poor visibility.

Fall:

In fall, migration mortalities tend to be associated with the occurrence of high pressure. Increased migration of insectivorous birds usually follows a cold front passage, associated with northerly flow of air. Also in the fall, mortality occurs in association with adverse weather conditions.

Illumination Patterns at the Structures

No accurate or precise data apparently exist that define lighting patterns during the early construction period at the Davis-Besse structures. During favorable weather, construction continued at night, and working areas were illuminated with incandescent and mercury vapor lights. It was during this phase that considerable numbers of bird strikes occurred.

In 1976 formal revisions of the site lighting system were recorded, but these occurred only around the Unit I buildings. Apparently no changes were made at the cooling tower, which generally utilized red navigation lights at night and white strobe lights during the day.

In 1977 mercury lights were installed around the Unit I buildings, but no changes were made in the cooling tower area. In the spring of 1978 light intensity readings were taken at ground level. The average of 105 readings was 1.7 foot candles.

By the spring of 1979 a conversion to high-pressure sodium-vapor lights had been completed for all areas, including the road and switchyard areas adjacent to the cooling tower. Light intensity readings, supposedly comparable to those taken in 1977, resulted in an average of 4.6 foot candles. This is nearly three times the light intensity recorded under the mercury lights.

Light intensity readings around the cooling tower base or at several elevations of the tower are not available for any period of its history. Consequently, only speculation is possible relative to lighting patterns and bird strikes. At the current time light readings along the adjacent road are 1.0 foot candles or less.

Along the tower base adjacent to the road, light readings were 0.15 to 0.25 foot candles. On the opposite tower side, no readings were obtainable. (Floodlamps mounted adjacent to the tower base are not normally used.)

Although the majority of these sodium-vapor, orange-colored lights were installed around the Unit I structures and the adjacent switchyard, diffuse light indirectly illuminates the tower, especially the S, SE, and E sections. Night observations during a time with low cloud ceiling and light drizzle revealed that it is possible to see the tower easily and even recognize the concrete seams from top to the bottom. Under such conditions birds should have been able to see the tower early enough to avoid a collision, even if the tower had been approached from the NE. The north and west faces of the tower are darker, but are still recognizable as a silhouette because of sufficient ambient lighting.

Various lighting designs or warning devices have been considered to ameliorate the bird stikes at towers. Preliminary Canadian work indicated that red flashing lights worked best to catch the attention of birds, but it has not yet been determined whether these findings can be adapted to induce aversion (Belton 1976, Solman 1976). At the Davis-Besse plant, when using the white strobe lights on top of the cooling tower during two migration periods (spring, fall 1975), no deviation from previously experienced mortality patterns was indicated. Normally only the red navigation lights are used at night. In both cases, birds may not have been aware of the large structure beneath the lights, since they, especially in adverse weather, do not illuminate the tower wall itself.

Gunn (1972) suggested that diffuse lighting, rather than glaring lights should be used and that the obstacle be lighted by red, orange, or blue light (Gunn 1972). With low-level diffuse light, birds would not be attracted and become disoriented or blinded and unable to find their way out of the dangerous zones. Observations at the lighthouse on the German Island of Helgoland illustrate this relationship. Before World War I mortalities of migrating birds were extremely high, and occasionally thousands of birds were killed in a single night. The birds were blinded by the strong light source and did not see the dark, unlit walls around or beneath the lamps. After several additional low-wattage lamps, which illuminated the concrete structures of the building, were installed, mortalities were drastically reduced. In recent times additional street lamps are also contributing to the visibility of the concrete lighthouse tower at night (F. Goethe in litt.)

The International Peace Monument on South Bass Island (Lake Erie), a few miles away from the Davis-Besse plant, now is not lighted during migration periods and has negligible kills. This is in contrast to the past when the tower had been flood-lighted.

The declining mortalities, recently observed at the Davis-Besse Nuclear Power Plant, seem to agree with these observation patterns. Most mortalities occurred at the cooling tower, especially after the construction lights were removed. After that time the tower was relatively dark. After the completion of the Unit I structures and the installations of many safety lights around these buildings in fall 1978, mortalities dropped considerably. A further reduction in fall mortality (1979) may be associated with the recent change to the more powerful high-pressure sodium-vapor lights.

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Table 1. Number of birds recovered at Davis-Besse Nuclear Power Station site during the spring and fall seasons from 1972 - 1979.

Year	SPRING				Year	FALL			
	CT	ST	MT	Total		CT	ST	MT	Total
1972	-	-	-	-	1972	4	5	1	10
1973	34	4	6	44	1973	56	47	-	103
1974	117	11	48	176	1974	279	52	8	339
1975	24	16	17	57	1975	125	15	15	155
1976	43	8	11	62	1976	183	22	2	207
1977	40	6	2	48	1977	131	20	-	151
1978	70	8	-	78	1978	65	6	-	71
1979	16	2	-	18	1979	35	-	-	35
Total	344	55	84	483	Total	878	167	26	1071
%	71.2	11.4	17.4	100.0	%	82.0	15.6	2.4	100.0

CT = Cooling tower

ST = Unit I structures

MT = Meteorological tower

TABLE 2

Families represented in birds recovered at Davis-Besse Nuclear Power plant site during the spring and fall migration periods from 1972-1979.

S P R I N G									
SPECIES	1973	1974	1975	1976	1977	1978	1979	TOTALS	%
Kinglets	1	0	9	5	3	1	1	20	4.1
Warblers	20	122	20	34	15	53	5	269	55.7
Finches	11	14	9	7	5	2	2	50	10.4
Mimids	6	6	0	4	1	1	1	19	3.9
Others	6	32	18	12	13	20	9	110	22.8
Unidentified	0	2	1	0	11	1	0	15	3.1
TOTALS	44	176	57	62	48	78	18	483	100.0

F A L L										
SPECIES	1972	1973	1974	1975	1976	1977	1978	1979	TOTALS	%
Kinglets	1	40	91	33	53	17	7	4	246	23.0
Warblers	7	38	178	98	119	98	43	25	606	56.5
Finches	0	2	9	8	6	8	3	0	36	3.4
Mimids	0	1	0	0	0	1	0	0	2	0.2
Others	2	6	48	16	27	14	8	5	126	11.8
Unidentified	0	16	13	0	2	13	10	1	55	5.1
TOTALS	10	103	339	155	207	151	71	35	1071	100.0

TABLE 3

Comparison of birds killed at the Davis Besse Nuclear Power Plant between spring (1973 - 1979) and fall (1972 - 1979) seasons. Only bird species with at least seven mortalities in either season are summarized.

Species	no. of birds in spring	no. of birds in fall	statistically significant difference, χ^2
Brown Creeper	2	6	
Catbirds	13	2	***
Golden-crowned Kinglet	1	92	***
Ruby-crowned Kinglet	19	154	***
Philadelphia Vireo	6	12	***
Red-eyed Vireo	35	38	
Black- and -white Warbler	17	10	
Tennessee Warbler	19	14	
Nashville Warbler	27	37	
Yellow Warbler	12	3	***
Magnolia Warbler	40	105	***
Black-throated Blue Warbler	4	14	***
Yellow rumped Warbler	13	14	
Black-throated Green Warbler	3	70	***
Chestnut-sided Warbler	11	18	
Bay-breasted Warbler	7	58	***
Blackpoll Warbler	2	38	***
Pine Warbler	2	7	
Ovenbird	16	34	
Yellowthroat	40	106	***
Canada Warbler	1	7	*
Wilson's Warbler	0	8	***
American Redstart	20	26	
Swamp Sparrow	7	17	*
Song Sparrow	9	7	

* significant difference ($P < 0.05$)

*** " " ($P < 0.005$)

TABLE 4. Summary of necropsy examinations of Davis-Besse site avian mortalities fall 1972 - fall 1979

FAMILY	Site or type of injury										NO. BIRDS*
	HEMATOMA ON HEAD		HEMATOMA	CRUSHED	FRACTURES		BILL	NECK	NO		
	light	heavy	on breast	skull	tibio-tarsus	tarso-wing meta-tarsus	injury	broken	signs	examined	
Ardeidae			1								1
Rallidae	7	1	1	1	2	2	1				8
Scolopacidae	1					1					1
Laridae							1				1
Columbidae	3		3		1		1				6
Picidae	4		1			1					5
Tyrannidae	7	1			1		1			2	11
Hirundinidae										1	1
Corvidae	1										1
Sittidae	1	2					1				3
Certhiidae	1	5					1				6
Troglodytidae	4	5				1	1				10
Mimidae	6	2			1		1			1	9
Turdidae	8	5			1				1		13
Regulidae	114	86		2	14	12	50	1	15		215
Sturnidae	1		1								1
Vireonidae	41	34	2	4	8	3	3	3	4		79
Parulidae	389	166	1	30	47	5	113	8	26		581
Icteridae	5	1				1		2	3		11
Thraupidae											1
Fringillidae	32	17		3	6	6	3	1	1		50
Ploceidae	1	1									2
Totals	626	327	10	40	81	5	177	17	53		<u>1016</u>

* a single bird may be cited in one or more columns

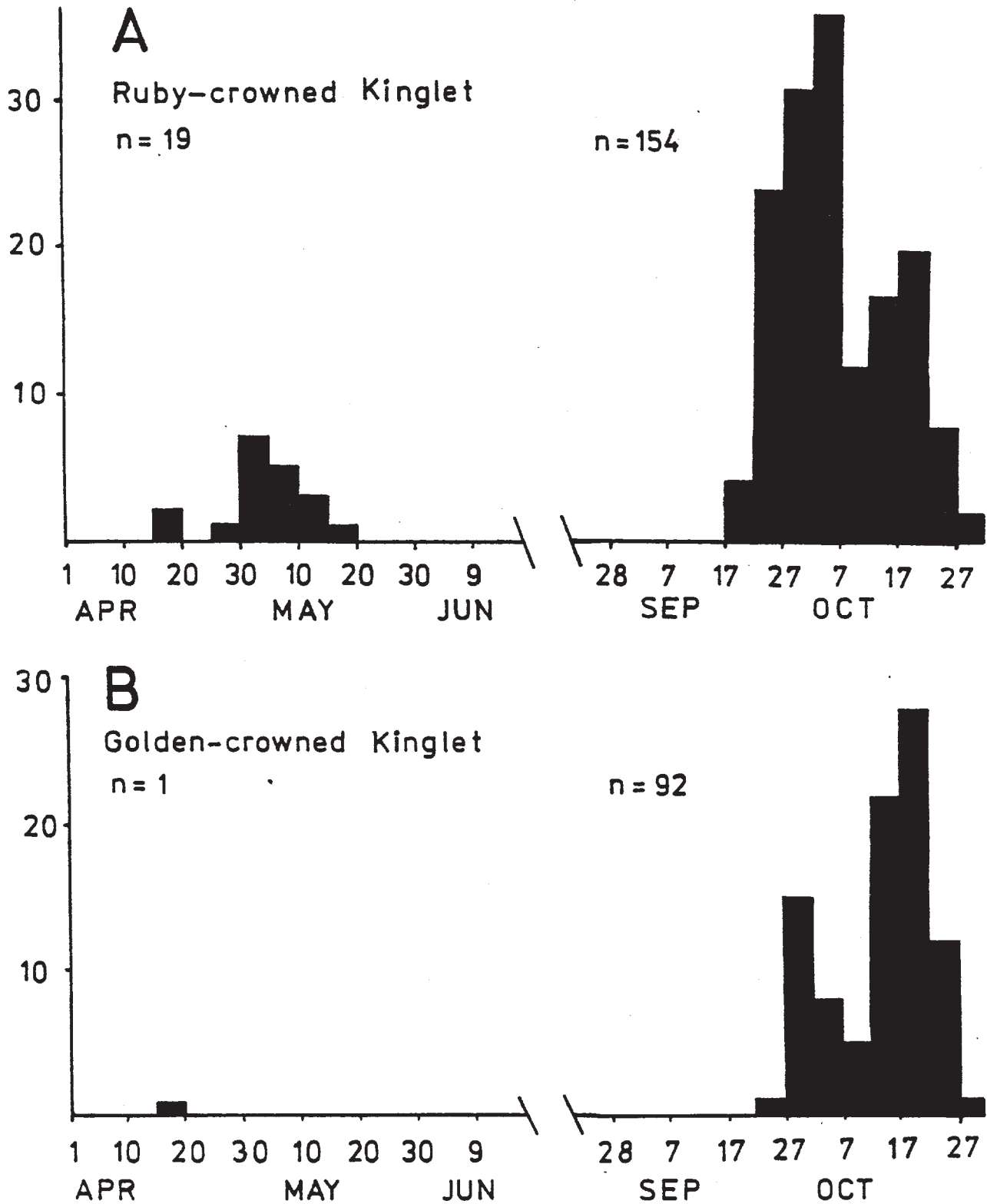


Fig. 1. Distribution of mortalities of (A) Ruby-crowned Kinglets, (B) Golden-crowned Kinglets, in the spring (1973 - 1979) and fall (1972 - 1979) migration seasons at the Davis-Besse Nuclear Power Plant.

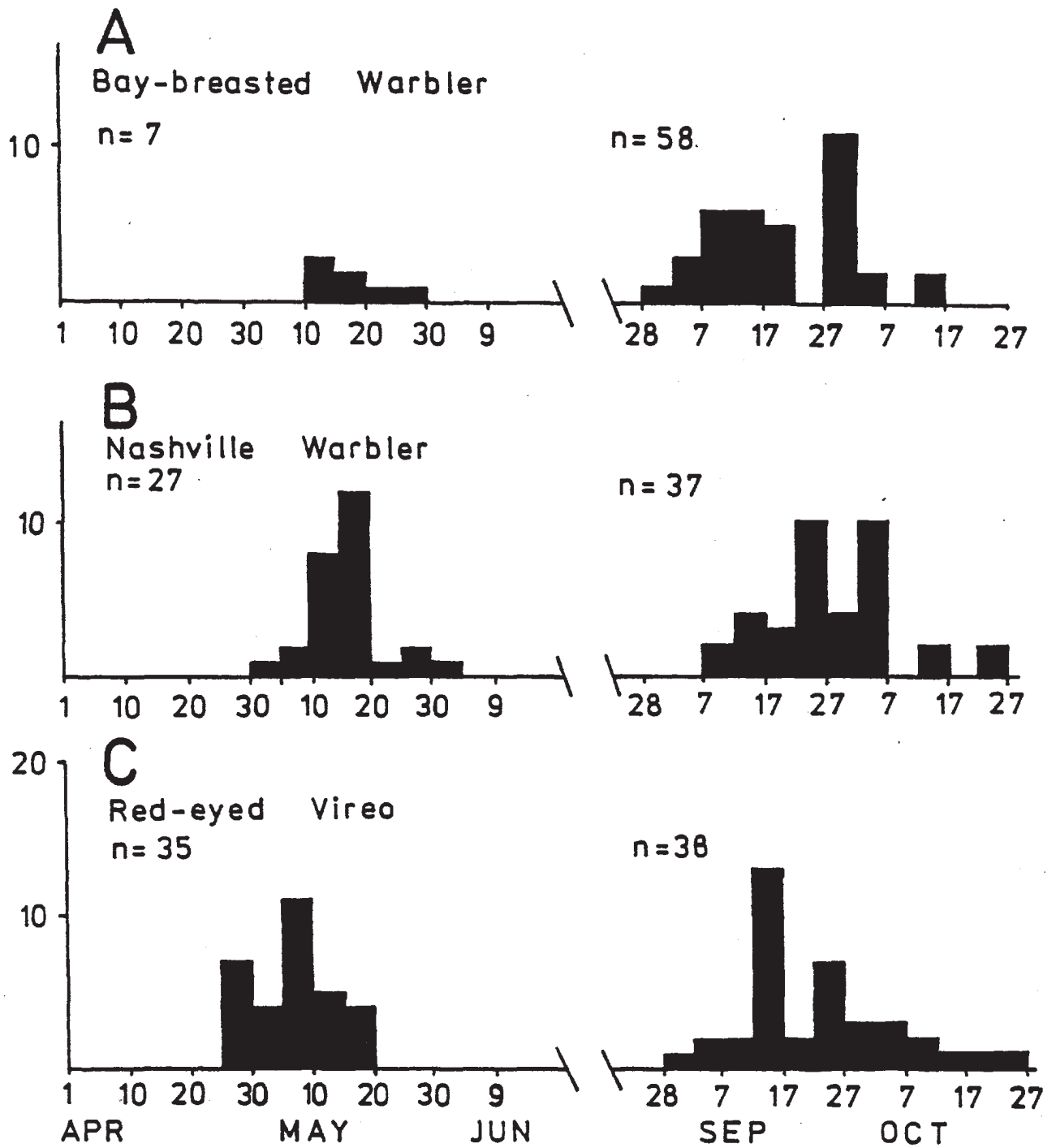


Fig. 2. Distribution of mortalities of (A) Bay-breasted Warblers, (B) Nashville Warblers, (C) Red-eyed Vireos in the spring (1973 - 1979) and fall (1972 - 1979) migration seasons at the Davis-Besse Nuclear Power Plant.

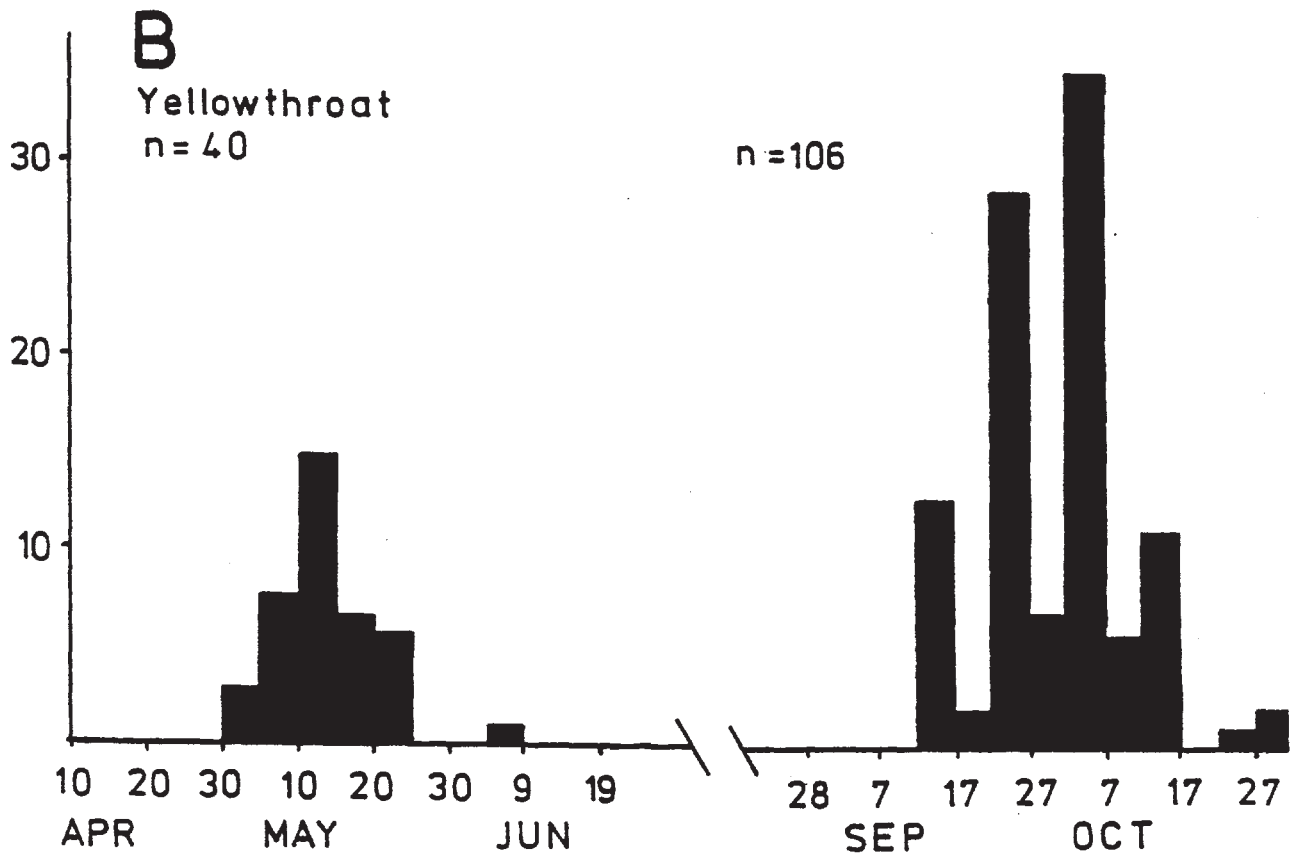
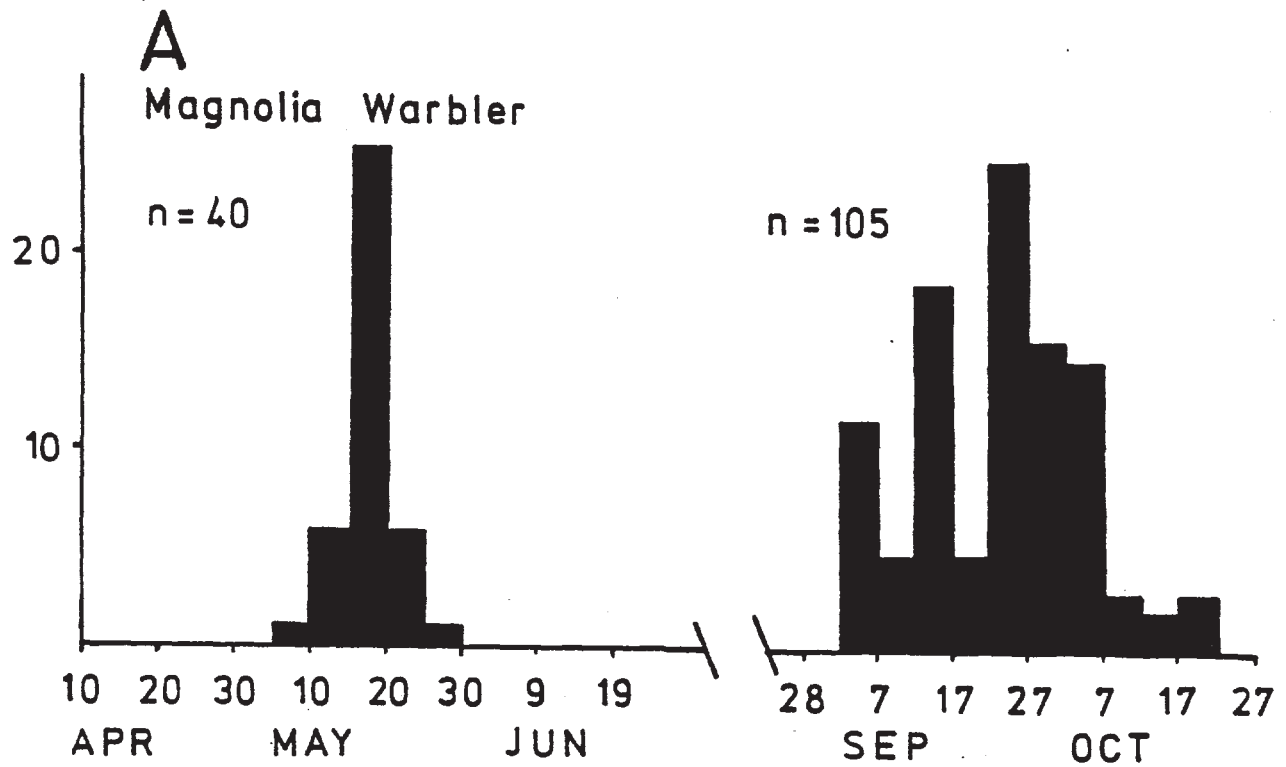


Fig. 3. Distribution of mortalities of (A) Magnolia Warblers, (B) Yellowthroats, in the spring (1973 - 1979) and fall (1972 - 1979) migration seasons at the Davis-Besse Nuclear Power Plant.

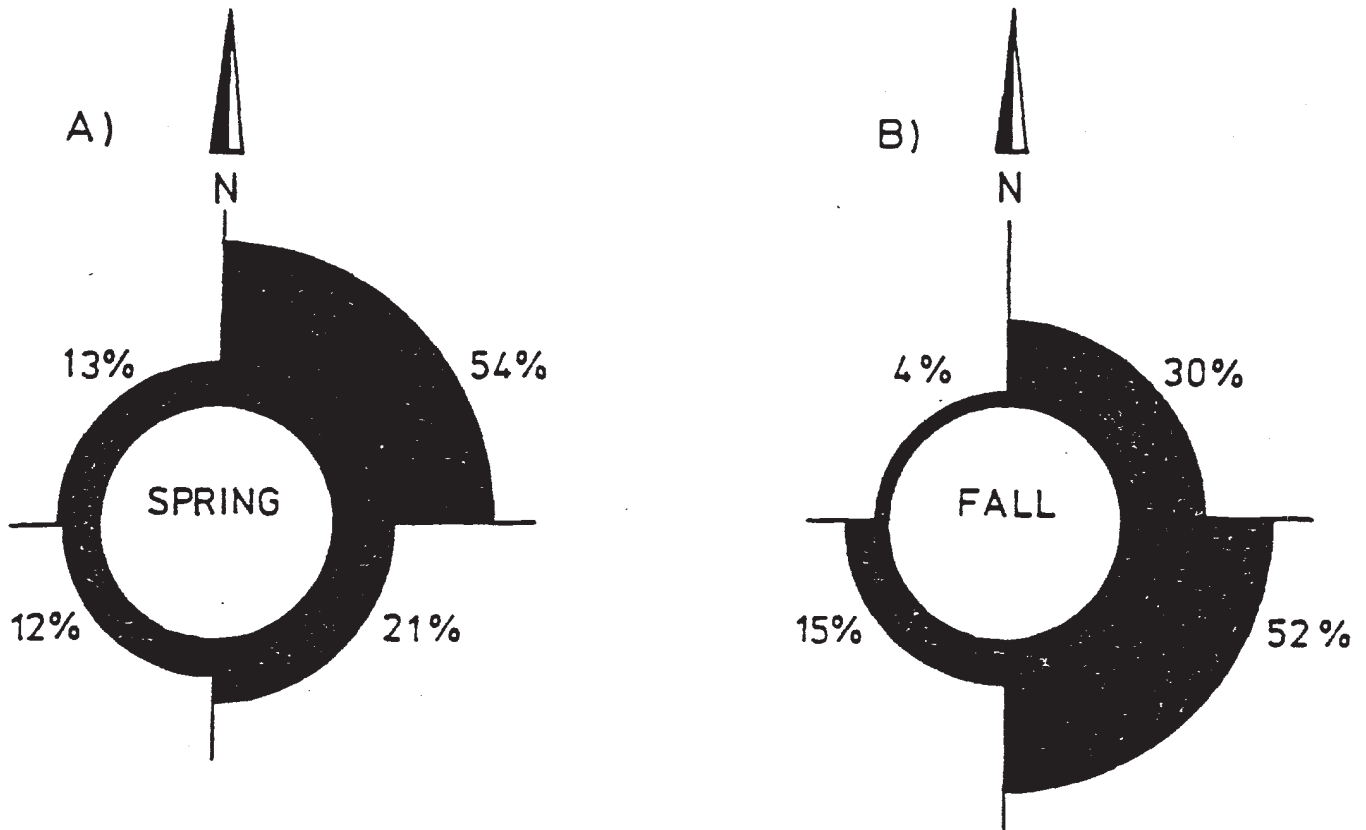


Fig. 4. (A) Mean frequency of bird mortalities by quadrants at Davis-Besse cooling tower for the spring periods 1974 - 1978.
 (B) Mean frequency of bird mortalities by quadrants at Davis-Besse cooling tower for the fall periods 1973 - 1978. The fall 1977 is excluded, since the most birds were found floating in the tower base.



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

April 14, 1981

Log No. 69
R. P. Crouse
J. H. Shortt
W. C. Rowles
L. A. Prime
C. T. Daft
J. D. Murray
C. R. Domeck
J. J. Myers
R. G. Scheraga
R. C. Lapp
W. C. Nyer
C. M. Rice
L. C. Jain

Docket No. 50-346

RECEIVED
APR 20 1981
NUCLEAR LICENSING

Mr. Richard P. Crouse
Vice President, Nuclear
Toledo Edison Company
Edison Plaza
300 Madison Avenue
Toledo, Ohio 43652

Dear Mr. Crouse:

Your letter of August 22, 1980, forwarded results concerning certain nonradiological environmental monitoring around the Davis-Besse site. Based upon these results, you concluded that continued monitoring of the Davis-Besse environs in four identified areas was no longer necessary. These areas are covered under your Technical Specifications, Appendix B, Sections 3.1.1.a.1, 3.1.2.a.1, 3.1.2.a.2, and 3.1.2.b.1. You stated that the associated monitoring programs are being terminated as of December 31, 1980, based upon your evaluations of the environmental impact of the Davis-Besse plant. You consider that your reports and notification of termination were consistent with Section 3.1 of Appendix B to your Technical Specifications.

With respect to Specification 3.1.2.b.1, "Bird Collisions", we concur in your report's conclusion that there has been no significant adverse effect on bird populations due to the cooling tower and other site structures. We will require no further monitoring in this regard.

With respect to the other specific programs covered in your reports, we are continuing our review and will advise you of our final conclusions in subsequent correspondence. Until we reach our final conclusions, we concur with your discontinuation of further monitoring in these areas. If our review indicates the need for continuing, but less intensive, program in accordance with Specification 3.1 of your Appendix B Technical Specifications, we will inform you at that time.

Sincerely,

John F. Stolz

John F. Stolz, Chief
Operating Reactors Branch #4
Division of Licensing

cc:
See next page

696 Log Number	
<input type="checkbox"/>	Nuclear Engr. Lead
<input type="checkbox"/>	Station Lead
<input checked="" type="checkbox"/>	Nuclear Services Lead
<input type="checkbox"/>	Q A Lead
<input type="checkbox"/>	Other _____
<u>None</u>	Due Date
<i>TPA 4/24/81</i>	

RECTYP A 2 1 3 TITLE NONRADIOLOGICAL ENVIRONMENTAL MONITORING TECH SPEC
 DATE 8/24/80 RECNO LN 126 RECNO (1) NRC
 (2) _____ (3) _____ ORIG J.F. STOLZ
 KWRDS (1) ERM (2) TS (3) _____
 (4) _____ (5) _____