

## Fermi2LRANPEm Resource

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**From:** Wentzel, Michael  
**Sent:** Monday, November 10, 2014 3:49 PM  
**To:** Lynne S Goodman  
**Subject:** RE: Environmental RAIs for the Fermi 2 LRA  
**Attachments:** Requests for Additional Information for the Environmental Review of the Fermi 2 License Renewal Application.pdf

Lynne,

Attached is a copied of the corrected RAI letter. As discussed, the date of the letter has been changed to today. For your awareness, it is not scheduled to be publicly available in ADAMS until tomorrow.

Thanks,  
Mike

**From:** Lynne S Goodman [mailto:goodmanl@dteenergy.com]  
**Sent:** Monday, November 10, 2014 9:57 AM  
**To:** Wentzel, Michael  
**Subject:** Re: Environmental RAIs for the Fermi 2 LRA  
**Importance:** High

Mike, we're checking the letter and don't see that RAI S-5 was modified per the telecom summary. I don't know if the letter has actually been issued, but I'm sending you this email as we continue checking the other items.

Lynne

-----"Wentzel, Michael" <Michael.Wentzel@nrc.gov> wrote: -----

To: "Lynne S Goodman (goodmanl@dteenergy.com) (goodmanl@dteenergy.com)" <goodmanl@dteenergy.com>  
From: "Wentzel, Michael" <Michael.Wentzel@nrc.gov>  
Date: 11/10/2014 06:00AM  
Cc: "Randall D Westmoreland (westmorelandr@dteenergy.com)" <westmorelandr@dteenergy.com>  
Subject: Environmental RAIs for the Fermi 2 LRA

Lynne,

Attached is an advanced copy of the environmental RAIs. If you have any questions, please let me know.

Thanks,

Mike

Michael Wentzel

Project Manager

NRR/DLR/RPB2

(301) 415-6459

[michael.wentzel@nrc.gov](mailto:michael.wentzel@nrc.gov)

[attachment "Fermi Environmental RAIs.pdf" removed by Lynne S Goodman/Employees/dteenergy]

**Hearing Identifier:** Fermi2\_LR\_NonPublic  
**Email Number:** 32

**Mail Envelope Properties** (Michael.Wentzel@nrc.gov20141110154800)

**Subject:** RE: Environmental RAIs for the Fermi 2 LRA  
**Sent Date:** 11/10/2014 3:48:59 PM  
**Received Date:** 11/10/2014 3:48:00 PM  
**From:** Wentzel, Michael

**Created By:** Michael.Wentzel@nrc.gov

**Recipients:**  
"Lynne S Goodman" <goodmanl@dteenergy.com>  
Tracking Status: None

**Post Office:**

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	1761	11/10/2014 3:48:00 PM
Requests for Additional Information for the Environmental Review of the Fermi 2 License Renewal Application.pdf	171855	

**Options**

**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**



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

November 10, 2014

Mr. Vito Kaminskas  
Site Vice President - Nuclear Generation  
DTE Electric Company  
Fermi 2 - 280 OBA  
6400 North Dixie Highway  
Newport, MI 48166

SUBJECT: REQUESTS FOR ADDITIONAL INFORMATION FOR THE ENVIRONMENTAL  
REVIEW OF THE FERMI 2 LICENSE RENEWAL APPLICATION

Dear Mr. Kaminskas:

By letter dated April 24, 2014, DTE Electric Company, submitted an application pursuant to Title 10 of the *Code of Federal Regulations* (CFR) Part 54, to renew the operating license NPF-43 for Fermi 2, for review by the U.S. Nuclear Regulatory Commission (NRC or the staff). The 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 Lynne Goodman, 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) 415-6459 or by e-mail at [michael.wentzel@nrc.gov](mailto:michael.wentzel@nrc.gov).

Sincerely,

*/RA/*

Michael Wentzel, Project Manager  
Projects Branch 2  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Docke No. 50-341

Enclosure:  
Requests for Additional Information

cc w/encl: Listserv

November 10, 2014

Mr. Vito Kaminskas  
Site Vice President - Nuclear Generation  
DTE Electric Company  
Fermi 2 - 280 OBA  
6400 North Dixie Highway  
Newport, MI 48166

SUBJECT: REQUESTS FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE  
FERMI 2 LICENSE RENEWAL APPLICATION

Dear Mr. Kaminskas:

By letter dated April 24, 2014, DTE Electric Company, submitted an application pursuant to Title 10 of the *Code of Federal Regulations* (CFR) Part 54, to renew the operating license NPF-43 for Fermi 2 Nuclear Power Plant, for review by the U.S. Nuclear Regulatory Commission (NRC or the staff). The 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 Lynne Goodman, 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) 415-6459 or by e-mail at [michael.wentzel@nrc.gov](mailto:michael.wentzel@nrc.gov).

Sincerely,

*/RA/*

Michael Wentzel, Project Manager  
Projects Branch 2  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Docket No. 50-341

Enclosure:

Requests for Additional Information

cc w/encl: Listserv

DISTRIBUTION: See next page

**ADAMS Accession No.: ML14275A004**

**\*concurred via email**

<b>OFFICE</b>	LA:RPB2:DLR*	PM:RPB2:DLR	BC:RPB2:DLR	PM:RPB2:DLR
<b>NAME</b>	IKing	MWentzel	BWittick	MWentzel
<b>DATE</b>	11/5/14	11/6/14	11/7/14	11/10/14

**OFFICIAL RECORD COPY**

FERMI 2  
LICENSE RENEWAL APPLICATION  
REQUESTS FOR ADDITIONAL INFORMATION

**Special Status Species and Habitats**

1. Section 3.6 of the environmental report (ER) describes species listed under the Endangered Species Act, as amended, that may occur on or within the vicinity of Fermi 2. Two species, the northern long-eared bat (*Myotis septentrionalis*) and the red knot (*Calidris canutus*), are currently proposed for listing under the Endangered Species Act and may occur on or within the vicinity of Fermi 2. Describe any known occurrences of these species on or within the vicinity of Fermi 2. Similarly, provide a copy of any ecological studies conducted on or within the vicinity of Fermi 2 that surveyed for these species.

2. Provide a copy of the following ER reference:

Kogge, S. (PWS) and J. Heslinga. 2013. Threatened and Endangered Species Survey and Assessment Report. Prepared for DTE Energy Fermi 2 by Cardno JFNew, West Olive, Michigan. Cardo JFNew File No. 1308035.00. October 2013.

**Land Use and Visual Resources**

1. The ER (Section 3.0.1, p. 3-1 and others) states that the Fermi 2 site is 1,260 acres. The Final Environmental Statement (FES) for Operation of Fermi 2 (ML12209A107; Section 2.5.1, p. 2-14) states that the site is 1,120 acres in size. Explain this difference and clarify which number the U.S. Nuclear Regulatory Commission (NRC) staff should use in preparing its supplemental environmental impact statement (SEIS).

2. The ER (Section 3.1.1, p. 3-21) states that 221 acres of the Fermi site “are developed areas that include existing Fermi 2 facilities, the decommissioned Fermi 1 plant, and associated support facilities.”

a. How much of this land is attributable to Fermi 2?

b. How much of this developed land is attributable to the decommissioned Fermi 1?

c. Does the 221 acres include any developed land associated with the Fermi 3 site preparation activities or other Fermi 3-related uses? If not, provide revised site land use acreages that include developed land associated with Fermi 3.

3. Provide the following information regarding the cooperative agreement with the U.S. Fish and Wildlife Service (FWS) for management of the Detroit River International Wildlife Refuge (DRIWR):

a. Confirm that the agreement dated September 25, 2003 (ML112650015) remains the most current and valid agreement.

b. Does DTE Electric Company (DTE) plan to maintain the agreement “as is” for the duration of the proposed license renewal term?

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- c. If not, what changes to the agreement does DTE foresee during the proposed license renewal term? Include any changes that would result from Fermi 1 decommissioning activities or Fermi 3 construction and operation.
4. The ER (Section 3.4.3.3, p.3-52) indicates that a portion of the Fermi site is used for growing crops. The ER for the Fermi 3 combined license (COL) application (ML110600498; Section 2.4.1.1.1, p.2-323) indicates that this cropland covers an area of 64 acres.
  - a. Does DTE lease this land to private individuals? If so, when do the applicable leases expire?
  - b. Describe DTE's plans for the cropland during the proposed license renewal term (i.e., will DTE continue to lease this land for agricultural use, let it lay fallow, develop it, etc.). Include any temporary or permanent changes in land use that may result from Fermi 1 decommissioning activities or Fermi 3 construction and operation.
5. The ER (Section 9.1.3.20, p. 9-12) indicates that DTE planned to submit a request to the Michigan Department of Environmental Quality (MDEQ) for a consistency determination in accordance with the Coastal Zone Management Act (CZMA) following DTE's submittal of the license renewal application to the NRC. During the NRC environmental site audit, DTE representatives indicated that DTE has since obtained a CZMA consistency determination from the MDEQ.
  - a. Provide a brief summary of the process and outcome of communications with the MDEQ pursuant to DTE obtaining a CZMA consistency determination for the proposed Fermi 2 license renewal.
  - b. Provide copies of the following references related to the CZMA consistency determination.
    - i. October 29, 2013, letter from Zackary, W. Rad, DTE Energy, to Chris Antieau, Michigan Department of Environmental Quality. Subject: DTE Electric Company, Coastal Zone Management Consistency Determination for the Renewal of the Fermi 2 Nuclear Power Plant License.
    - ii. July 28, 2014, letter from Chris Antieau, Michigan Department of Environmental Quality, to Randall Westmoreland, DTE Energy Company. Subject: Federal Consistency Determination, Nuclear Regulatory Commission's Relicensing of Fermi 2 Nuclear Facility, Frenchtown Township, Monroe County, Michigan.
6. The NRC's SEIS for Fermi 2 license renewal will include brief descriptions of the utility and transportation infrastructure on the Fermi 2 site similar to Section 3.1.6.1 in the NRC's 2013 GEIS (ML13107A023). To facilitate the staff's preparation of this section, provide a brief summary of non-nuclear fuel storage on the Fermi 2 site. The underground gasoline and diesel storage tanks described in Section 9.1.3.8.3 of the ER need not be included in the summary.

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### **Terrestrial Ecology**

1. The ER (Section 3.6.8, p.3-121) mentions a 2000 Wildlife Management Plan associated with the Wildlife Habitat Council certification for the Fermi site.
  - a. Provide a copy of the most recent Wildlife Management Plan.
  - b. Provide a copy of the most recent Wildlife Habitat Council certification.
  - c. When did DTE first obtain Wildlife Habitat Council certification for the Fermi 2 site?
  - d. Does DTE intend to maintain Wildlife Habitat Council certification during the proposed license renewal term?
2. The ER (Section 3.6.11, p.3-128) indicates that plant surveys were performed on the DTE/North American Wetlands Conservation Act transmission right of way (ROW) prairie planting in 2005, 2007, and 2011. Provide the following references related to these surveys, which were provided for NRC staff review to support TE-3 during the environmental audit.
  - a. "Lagoon Beach Unit: Power for Preservation of Natural Areas" PowerPoint presentation from Barry E. Muller. Only the Cover Page and the four pages entitled, "Coastal Prairie Project, Step Two-Point-Five" that discuss the pre-treatment vegetation survey are needed.
  - b. October 1, 2007, letter from Ryan O'Connor, Conservation Scientist, Michigan Natural Features Inventory, to Barry Muller, Fermi 2 Power Plant. Include list of plants noted during September 19, 2007, field survey.
3. The ER (Section 3.6.11, p.3-128) states that ongoing terrestrial monitoring on the Fermi site includes "wildlife habitat annual monitoring." Describe this monitoring in more detail to include who conducts the monitoring, what terrestrial wildlife or vegetation is monitored, monitoring methods, and the periodicity with which monitoring takes place.
4. The FES for Operation of Fermi 2 (Section 4.4.1.1, p.4-10) states that, in September 1973, 50 dead birds were found that were attributable to collisions with the cooling towers. The ER (Section 3.6.8, p.3-123) says that 15 dead birds were found in September 1973. Explain this difference and clarify which number is correct.
5. The NRC's Final Environmental Impact Statement (FEIS) for the Fermi 3 COL (ML12307A172; Section 5.3.1.1, p.5-20) includes several measures that DTE determined, during consultations with the FWS and the Federal Aviation Administration, would reduce bird collision hazards. The FEIS indicates that DTE plans to implement these for Fermi 3. Does DTE implement any of the Fermi 3 measures at Fermi 2?
6. The ER (Section 3.6.12.4, p.3-139) indicates that DTE remains in contact with the FWS to keep abreast of future changes in the regulatory environment regarding compliance with the Migratory Bird Treaty Act (MBTA). Provide a brief summary of the frequency and ways in which DTE coordinates with FWS concerning MBTA-protected birds.

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7. The ER (Section 3.6.8, p.3-123) summarizes information on bald eagle nests on the Fermi 2 site that were observed between 2007 and 2013.
  - a. Does DTE regularly survey for bald eagle nests?
  - b. How does DTE evaluate whether site activities could affect bald eagles or nesting behavior?
  - c. Provide updated information on any bald eagle nests that have been observed since the last observation mentioned in the ER (early spring 2013).
  - d. Provide the following references related to this request, which were provided for NRC staff review to support TE-12 during the environmental audit.
    - i. April 17, 2012, letter from Tabitha Viner, FWS, to Kenneth Adams, FWS, and enclosed Veterinary Pathology Examination Report.
    - ii. December 4, 2012, Eagle take permit application from DTE to FWS.
    - iii. December 17, 2012, letter from Larry A. Harrison, FWS, to Matthew Shackelford, DTE Energy, regarding eagle permit review.
8. On July 31, 2009, DTE provided the NRC staff with a map of bald eagle nest locations on the Fermi site (ML092290704, p. 201) in response to the NRC staff's request for additional information (RAI) TE2.4.1-7 for the COL environmental review. Provide an updated version of this map.
9. On February 15, 2010, DTE provided the NRC staff with a map of eastern fox snake sightings on the Fermi site (ML100541329, p. 58) in response to the NRC staff's RAI TE2.4.1-12 for the COL environmental review. Provide an updated version of this map that includes all additional sightings of the snake that have occurred since this time.
10. The NRC staff's FEIS for the Fermi 3 COL (p.4-37) states, "Increased traffic associated with operation of Fermi 3 has the potential to increase wildlife mortality, including mortality of eastern fox snakes, resulting from vehicle-wildlife interactions." Provide an assessment of how increased traffic and site activities associated with Fermi 2 refueling outages as well as regular grounds maintenance and infrastructure repairs that would occur during the proposed license renewal term would affect the eastern fox snake.
11. Section 5 of DTE's 2012 Fermi 3 Habitat and Species Conservation Plan (ML12163A577) provides measures to minimize or mitigate impacts to the eastern fox snake. Such measures include educating employees through use of a fox snake manual; adding the eastern fox snake to pre-job brief checklists so that the issue is reinforced prior to work beginning each day; and having a biologist capture and release snakes observed in developed areas prior to the commencement of work in those areas.
  - a. Does DTE maintain similar measures regarding the eastern fox snake for work performed to support ongoing operations of Fermi 2? If so, please summarize such measures.

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- b. Provide the following references related to this request, which were provided for NRC staff review to support TE-17 during the environmental audit.
    - i. Enclosure L to MCE06. Table entitled "List of Federal and State Threatened or Endangered Species or Species of Special Concern."
    - ii. March 3, 2014, Protected Species Protection Plan for Project ECC-14-001.
12. Section 5.4 of DTE's 2012 Fermi 3 Habitat and Species Conservation Plan (ML12163A577) indicates that DTE will maintain logs of eastern fox snake monitoring and that, in cases where snakes are observed, DTE will create a report noting the number of snakes located and removed and the relocation site. The plan also indicates that DTE will create a yearly report to summarize the results of its mitigation efforts and that all snakes killed in the construction process will be reported to the MDNR as required by applicable take permits.
  - a. Does DTE maintain such records for ongoing operations of Fermi 2?
  - b. Does DTE foresee the need to obtain a Michigan Department of Natural Resources (MDNR) take permit for activities such as increased traffic and site activities associated with refueling outages or regular grounds maintenance and infrastructure repairs associated with Fermi 2?
13. The ER (Section 3.6.8, p.3-123) indicates that the eastern fox snake was observed during a 2009 study. However, the referenced study (Black and Veatch 2009; ML093380365; Section 4.4.4, p.4-12) states that the eastern fox snake was not observed during the study. Explain this difference.
14. The 2013 Annual Non-Radiological Environmental Report (ML14118A275; p.4) indicates that DTE performs "routine monitoring for evidence of unusual or important environmental events." What does this monitoring entail?
15. The ER (Section 3.6.8, p.3-123) indicates that in October 2007, 45 dead birds were found at the Fermi 2 south cooling tower during a 1-week period. During the site audit, DTE staff described to NRC staff a 2-year surveillance effort that DTE undertook in 2008 and 2009 and subsequently developed guidance for reportability of "excessive bird impactation events" as "unusual or important environmental events" under Appendix B, Section 4.1, of the Fermi 2 operating license (ML053060228). Provide the following related to this information:
  - a. A table of all available bird strike occurrences from the Fermi 2 site that includes the following: date observed, species, number of individuals affected, and any follow-up actions that DTE undertook.
  - b. The results of the 2008 and 2009 surveillance effort if not included in the table requested above in (a).
16. Provide a summary of the nuclear licensing work instruction for reporting unusual or important environmental events. In the summary, please include examples of the types of events that would result in a report to the NRC, such as mortality or observation of a Federally-listed or State-listed species, fish kills, or excessive bird mortality. In addition, provide a list of the Federally-listed and State-listed species described in the appendices of

ENCLOSURE

the nuclear licensing work instruction. Describe DTE's collaborative effort with FWS to restore an area of tall-grass prairie in the southeast corner of the Fermi 2 site.

17. Describe DTE's plan to develop a company-wide Avian Protection Plan including level of coordination with FWS, the types of mitigate measures that DTE is considering that would apply to Fermi 2, and anticipated schedule for implementation.

18. Provide copies of the following ER references:

- a. Ducks Unlimited. 2011. Detroit Edison Fermi Site, Monroe County Wetland Investigation Report. Ducks Unlimited, Great Lakes Atlantic Region: Ann Arbor, Michigan.
- b. Ecological Sciences Department, Cyrus Wm. Rice Division, 1973-74 Annual Report of the Terrestrial Ecological Studies at the Fermi Site, NUS Corporation, 1974.
- c. Fermi. 2011c. Fermi 2 ROW Prairie Planting Survey. July 20, 2011.

### **Aquatic Ecology**

1. Please provide a copy of the following reference cited in ER Section 3.6.7.4:

Heitman, F. 2012. Field Notes from Tour of Fermi Site on May 20, 2012.

### **Meteorology, Air Quality, and Noise**

1. Section 3.2.2.2 of the ER provides temperature data collected at the Fermi meteorological tower from 2001-2007. Please provide the following meteorological information from the data recorded at Fermi's meteorological facility for the most recent 5 years:

- a. mean monthly and annual temperatures
- b. mean monthly precipitation and annual precipitation

2. Are there expected upgrade/replacement activities for equipment/operation that could increase or decrease air emissions over the license renewal period? Please provide associated air permits obtained for installation and operation of the equipment.

3. Provide available site-wide emission inventory data (annual) for greenhouse gases (GHG) for the most recent 5 years. Emissions should include stationary combustion sources, mobile sources (commuters, visitors, delivery vehicle, etc.) and other sources (refrigerant leakage, emissions from switchyard). Address the following:

- a. Identify and discuss the GHG emission sources;
- b. Provide information (e.g., operating hours per year, fuel consumption and rates, etc. as applicable for each source) used to support the GHG emission values provided in the ER; and

ENCLOSURE

- c. Briefly discuss inconsistencies noted between the 2012 GHG emission values provided in the ER (Table 2.2-7) and the 2012 GHG emission values provided during the environmental audit.
4. Section 3.3 of the ER states the following “Some intermittent gunshot noise from the Fermi firing range and noise from the Fermi 2 cooling towers were faintly audible at five of the seven [noise monitoring locations (NMLs)], including the closest residence, located 0.72 miles west-northwest of the Fermi 2 reactor (DECO 2011, Table 2.5-69; NRC 2013c, Section 2.10.2).” In reviewing the cited reference, DECO 2011, the following statement is provided: “The approximate distance from each NML to Fermi 2 equipment is provided in Table 2.5-69,” but the equipment is not identified. Furthermore, Deco 2011 identifies that the noise monitoring locations were selected based on the location of the nearest sensitive receptors (i.e., the nearest residences). According to Table 2.5-69 and Figure 2.5-32 provided in DECO 2011, NML-2 (approximately 180 meters southeast of a nearby residence) is located 0.5 miles away from Fermi 2 (which would result in this noise sensitive receptor/residence being approximately 0.61 miles from Fermi 2) and NML-7 (near the Swan boat club) is located near a residence approximately 0.72 miles away from Fermi 2. Please clarify:
  - a. the reference point at Fermi used to obtain the distance between the NML and Fermi 2
  - b. the nearest residence distance and closest NML to the residence
5. Please describe the notification system that is mentioned in Section 4.3.4 of the ER regarding nighttime firing range training activities to the communities of Frenchtown Township, Village of Estral Beach, and Berlin Township.
6. Identify the time(s) shooting range training occurs during nighttime exercises and how many times per year these nighttime exercises take place? Please discuss the typical duration of these exercises within the timeframe identified.
7. Provide the following ER references:
  - a. DTE. 2013h. DTE Response to Fermi 2 License Renewal Project Request for Information. Response to RFI DTE2.2-024, Greenhouse Gas Emissions, 2012. June 12, 2013.
  - b. DTE. 2013g. DTE Response to Fermi 2 License Renewal Project Request for Information. Response to RFI DTE2.2-023, Air Emissions. October 10, 2013.
  - c. Fermi. 2013a. Fermi Energy Center Renewable Operating Permit MI-ROP-B4321-2013. November 1, 2013.
  - d. DTE. 2013x. DTE Response to Fermi 2 License Renewal Project Request for Information. Response to RFI DTE4.3-001, Noise. May 8, 2013.

ENCLOSURE

- e. DTE. 2013cc. DTE Response to Fermi 2 License Renewal Project Request for Information. Response to RFI DTE9.1.3-006, Federal, State, Local Regulatory Standards: Discussion of Compliance—Fermi 2 Annual Air Permit Reports Submitted to MDEQ. April 19, 2013.
- f. Fermi. 2008g. Michigan Air Emissions Reporting System (MAERS), 2008 Source Summary Report—AQD Source ID (SRN) B4321. 2008.
- g. Fermi. 2009g. Michigan Air Emissions Reporting System (MAERS), 2009 Source Summary Report—AQD Source ID (SRN) B4321. 2008.
- h. Fermi. 2010j. Michigan Air Emissions Reporting System (MAERS), 2010 Source Summary Report—AQD Source ID (SRN) B4321. 2010.
- i. Fermi. 2011h. Michigan Air Emissions Reporting System (MAERS), 2011 Source Summary Report—AQD Source ID (SRN) B4321. 2011.
- j. Fermi. 2012j. Michigan Air Emissions Reporting System (MAERS), 2012 Source Summary Report—AQD Source ID (SRN) B4321. 2012.

**Water Resources-Surface Water**

1. Please provide complete copies of the Water Use Report submittals for the period 2009-2013, submitted in accordance with the Michigan Water Use Law, as referenced in Section 9.1.3.5 of the ER.
2. Please provide copies of the following documents as discussed in the ER:
  - a. National Pollutant Discharge Elimination System (NPDES) permit renewal application for Permit No. MI0037028 submitted in March 2014 (ER Section 9.1.3.3.2 and Appendix A)
  - b. Stormwater Pollution Prevention Plan (ER Sections 2.2.8.2.1, 3.4.3.2, 9.1.3.3)
  - c. Industrial/Non-Domestic User Discharge Permit No. 1020 (ER Sections 2.2.8.2.2, 9.1.3.3.4).
3. Provide a status update of Fermi 2's NPDES permit renewal. If known, indicate the expected timeframe for issuance of the renewed permit by the State of Michigan.
4. As referenced in Section 2.2.8.2.1 of the ER, please describe when stormwater outfall 014 became operational and why it did not appear to be noted in Fermi 2's NPDES permit renewal application along with other stormwater-only outfalls.
5. Summarize and provide copies of any Notices of Violation, nonconformance notifications, or related infractions received from regulatory agencies associated with NPDES permitted discharges, sanitary sewage systems, groundwater or soil contamination, including spills, leaks, and other inadvertent releases of fuel solvents, chemicals, or radionuclides received

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to date (covering past 5 years inclusive of 2014 year to date). Include correspondence of self-reported violations to responsible agencies.

6. Provide the following reference cited in Section 9.1.3.3.1 of the ER:

DTE. 2013aa. DTE Response to Fermi 2 License Renewal Project Request for Information. Response to RFI DTE9.1.3-002, Water Quality (401) Certification and Coastal Zone Management Act. February 1, 2013.

7. Please provide copies of Clean Water Act Section 404 permits, and state equivalent permits, including the following: MDEQ Permit No. 11-58-0055-P and After-the-Fact Permit, USACE Permit No. 88-001-040-8, and Army Permit LRE-1988-10408-L13. (ER Sections 3.5.1, 9.1.3.3.7.)
8. Please provide the following reference cited in ER Section 9.1.3.3.7:

MDEQ. 2013a. Correspondence from Katherine David, MDEQ, to Valerie Byrd, DTE Energy, Michigan Department of Environmental Quality (MDEQ) Permit Number 11-58-0055-P, T6S, R1 OE, Section 21, Frenchtown Township, Monroe County. April 24, 2013.

9. Please provide a description of any planned operational and maintenance activities (or projects) anticipated to be undertaken during the license renewal term (as possible, identify expected timeframe, location(s) affected, acres disturbed, and activity/project duration).

### **Alternatives**

1. Please provide a copy of the following ER reference:

DTE. 2013n. DTE Response to Fermi 2 License Renewal Project Request for Information. Response to RFI DTE2.2-025, Plant Annual Capacity Factor 2010–2012. November 20, 2013.

### **Cumulative**

1. Please provide the name, description, location, and status of any additional past, present, or reasonably foreseeable projects or actions that have been identified since the license renewal ER was prepared.

### **Historical and Cultural Resources**

1. Please indicate the percentage of land within the Fermi property that has been formally surveyed.
2. Please provide a summary of the cultural resource protection procedures followed by DTE staff for ground disturbing activities and inadvertent discoveries. Provide the process in place for the assessment of impacts to historic and cultural resources for activities occurring during periods of normal operation.

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3. Please provide any updated information on ongoing preservation or mitigation activities associated with Fermi 1. Provide the mitigation plan referenced in section 3.7.5.2 of the ER provided to the NRC.
4. Please provide an update on any consultations that have occurred with the Michigan State Historic Preservation Office or other consulting parties related to the construction of Fermi 3 since the publication of the license renewal ER.
5. Verify if geomorphological work was conducted for archaeological surveys performed at the site to determine the depth of deposits and how deep archaeological remains may be present.
6. Please provide any information on cultural resource training required for Fermi staff.
7. Please provide copies of all letters and communications to and from the Michigan State Historic Preservation Office specific to determining the National Register of Historic Places-eligibility of all cultural resources identified to date within the Fermi property, including the plant site and along existing transmission lines, up to the first substation. Please include information related to the status of the eight cultural resources with undetermined eligibility determinations referenced in Section 3.7.3.2 of the license renewal ER.
8. Please describe the process in place for consideration of cultural resources for the DRIWR under the Cooperative Agreement between FWS and Detroit Edison. Please include the process for inadvertent discovery during normal operation.

### **Socioeconomic**

1. Provide updated property tax information, similar to the data provided in Table 3.8-2 of the ER. Include data for the years 2012 and 2013, if available.
2. Table 3.8-3, 2011 Frenchtown Charter Township Millage Spread, indicates that non-homestead millage rates apply to Fermi 2 and the homestead rates do not. Do all of the other millage rates shown in the table apply to the Fermi 2 property tax payment? Is the entire 2011 Fermi 2 property tax payment (\$19,788,576) distributed based on these millage rates?
3. Table 3.8-4 presents millage totals by school and resort district. It's not clear from the table and discussion in Section 3.8.5 how the Fermi 2 property tax payment is allocated to these districts when compared to the millage rates in Table 3.8-3. Is all of the information presented in this table relevant to describing how the Fermi 2 property tax payment is distributed?
4. The last paragraph states that Fermi 2 is located in the Jefferson Resort School District. How much of the 2011 total of \$19,788,576 Fermi 2 property tax payment is allocated to this school district?

A table showing the dollar distribution (or percentage) of the Fermi 2 property tax payment and each entity's total property tax revenue would be helpful. It's important to understand

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how dependent some of these entities are on the property tax revenue received from the Fermi 2 property tax payment via Frenchtown Township.

5. In addition to tax payments and tax payment information presented in Section 3.8.5 of the ER, describe any other major annual support payments, one-time payments, and other forms of non-tax compensation (if any) provided to local organizations, communities, and jurisdictions (e.g., county, municipality, townships, villages, incorporated places, and school districts) on behalf of Fermi 2.
6. Provide information about any anticipated changes in state and local tax laws, rates, and assessed property value or any other recent or anticipated tax payment adjustments that could result in notable future increases or decreases in property taxes or other tax payments.
7. Provide ER reference: DTE. 2012f. DTE Response to Fermi 2 License Renewal Project Request for Information. Response to RFI DTE3.8.5-001 Revision 1, Follow-Up on 8-27-12 Local Government Revenues. November 8, 2012.
8. Provide Fermi License Renewal Reading Room portal LRA ENVI Responses S-1 thru S-7 and LRA ENVI response S-8, in other words all of the material in "Environmental (3)" including all of the Tax Information Tables (i.e., Attachments A, B, C, and D):
  - a. Attachment A – Table 1, Fermi 2 Property Tax Distributions 2009–2013; Table 2, 2013 Frenchtown Charter Township Millage Totals by District; and Table 3, 2013 Property Tax Distribution Associated with Fermi 2
  - b. Attachment B – Table 1: Fermi II Power Plant, Property Taxes Paid by Millage Type, 2011 Tax Year; Table 2: Fermi II Power Plant, Property Taxes Paid by Millage Type, 2012 Tax Year; and Table 3: Fermi II Power Plant, Property Taxes Paid by Millage Type, 2013 Tax Year
  - c. Attachment C – Frenchtown Charter Township "2012" Millage Spread
  - d. Attachment D – Table 3.8-5b, 2013 Property Tax Distribution Associated with Fermi 2
9. Questions regarding Attachment D, Table 3.8-5b. "2013 Property Tax Distribution Associated with Fermi 2"
  - a. Footnote e appears to be missing in the table. Is the footnote referring to column "Total Fermi Power Plant Taxes" or "Total Township Taxes"?
  - b. Are the numbers under the column heading "Total Township Taxes" total taxes owed, property taxes owed, tax revenue from all sources, or tax revenue from property taxes alone? Please provide the percent of "Total Fermi Power Plant Taxes" from total revenue (or property tax revenue) by taxing jurisdiction?

ENCLOSURE



- c. Please explain the following statement in footnote e: "Due to different classifications and tax abatements, actual mills paid may not equal mills subjected to."

**Waste Management – Non-Radioactive**

1. Please provide a list of the offsite treatment, storage, and disposal facilities used for Fermi 2 liquid and solid mixed waste management as discussed in the ER Section 2.2.3.4.
2. Please provide the process for managing Fermi 2 waste streams that are radioactive and contain PCB content in excess of 50 parts per million.
3. Please provide a copy of Fermi 2's conditional exemption claim for low-level mixed waste storage and disposal per Michigan Administrative Code Section R299.9822.
4. Please provide a list of all offsite facilities where Fermi 2 Resource Conservation and Recovery Act waste is shipped and managed.
5. Please provide information explaining the process for managing Fermi 2 chemical inventory to avoid excess volume of unused or expired chemicals.

Letter to V. Kaminskas from M. Wentzel dated November 10, 2014

SUBJECT: REQUESTS FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE  
FERMI 2 LICENSE RENEWAL APPLICATION

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