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**Docket:** NRC-2008-0603

Receipt and Availability of Application for Combined License: PPL Bell Bend, LLC

**Comment On:** NRC-2008-0603-0028

Bell Bend Nuclear Power Plant; Draft Environmental Impact Statement

**Document:** NRC-2008-0603-DRAFT-0023

Comment on FR Doc # 2015-09274

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## General Comment

With regards to air quality - while the draft EIS identifies Luzerne County as attainment for all criteria pollutant, the draft EIS does not account for transport of potential pollutants into neighboring counties. The surrounding counties of Carbon, Northampton, Lehigh, and Berks are all part of nonattainment areas for the 2008 ozone NAAQS. Additionally, the counties of Northampton and Lehigh are designated nonattainment for the 2006 PM2.5 NAAQS.

In addition, on page 2-215, line 34, the draft EIS indicates that "EPA requires states to submit a SIP for maintenance areas to provide for continued attainment in the area for at least 10 years after redesignation." This is factually incorrect. EPA requires states to submit a SIP for nonattainment areas; as part of the redesignation process (from nonattainment to attainment) the EPA requires states to submit a maintenance plan that covers the first of two 10 year maintenance periods, thus the newly redesignated area must maintain the NAAQS for the next 20 years.

As stated in the draft EIS, EPA approved the Luzerne County maintenance plan for the 1997 ozone NAAQS on December 19, 2007 (72 FR 64948) for the first 10 years of the maintenance period (i.e. from 2007 to 2017). This means that a second maintenance plan is due eight years after approval of the first, i.e. December 2015. The draft EIS should reference this second maintenance plan and not the one approved in 2007 as it is not designed to include the period between 2017 to 2027.

SUNSI Review Complete

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