



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

July 30, 2015

LICENSEE: Exelon Generation Co., LLC

FACILITY: Braidwood Station, Units 1 and 2

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON JUNE 19, 2015, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND EXELON GENERATION CO., LLC, CONCERNING REQUESTS FOR ADDITIONAL INFORMATION PERTAINING TO THE BRAIDWOOD STATION LICENSE RENEWAL APPLICATION (TAC. NOS. MF1832 AND MF1833)

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of Exelon Generation Co., LLC held a telephone conference call on June 19, 2015, to discuss and clarify the staff's requests for additional information (RAIs) concerning the Braidwood Station license renewal application. The telephone conference call was useful in clarifying the intent of the staff's RAIs.

Enclosure provides a listing of the participants and a listing of the RAIs discussed with the applicant, including Exelon's response.

The applicant had an opportunity to comment on this summary.

/RA/

Richard Baum, Sr. Project Manager
Projects Branch 2
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos. 50-456 and 50-457

Enclosure:
List of Participants and List of Requests
for Additional Information

cc w/encl: Listserv

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DISTRIBUTION: See next page

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*concurrence via e-mail

OFFICE	LA:RPB2:DLR*	PM:RPB2:DLR	BC:RPB2:DLR	PM:RPB2:DLR
NAME	IBetts (memo only)	RBaum	JDanna	RBaum
DATE	7/9/15	7/10/15	7/27/15	7/30/15

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**Summary of Teleconference Call-Request for Additional Information with Exelon on
Federal & State
Comments on Braidwood Draft Supplemental Environmental Impact Statement (DSEIS)**

DATE: June 19, 2015

PARTICIPANTS: (NRC) Richard Baum, Briana Grange, Dennis Logan

(Exelon) Nancy Ranek, Zigmund Karpa, John Petro, Michael Gorga,
Jeremiah Hass, Rebecca Maddox, Rocky Bean

PURPOSE: To request Exelon responses to Federal and State agency
comments on Braidwood DSEIS

SUMMARY OF DISCUSSION:

The following information was conveyed to Exelon, and is required to complete the responses to public comments from both Federal and State agencies regarding the Braidwood DSEIS in two main areas as follows:

Aquatic and Terrestrial Ecology - These include comments from Environmental Protection Agency (EPA) on bald eagles, Illinois Department of Natural Resources (IDNR) comments on State-listed species, and an Exelon comment on the pallid shiner.

Federally Protected Species and Habitats – These include comments from U.S. Department of Interior (DOI) Fish and Wildlife Services (FWS) and EPA Comments on northern long-eared bat, and DOI FWS and EPA comments on sheepnose mussel.

After discussing these issues with Exelon, some of the issues were resolved over the teleconference. Listed below are the remaining questions that were transmitted to Exelon by email on June 19, 2015 for resolution and Exelon's response.

EPA Comment on Bald Eagles

Have bald eagles been observed nesting on any of the cooling pond islands during the 2014 nesting season or in 2015 to date?

Exelon response - *No.*

If bald eagles were observed nesting on the site, would Exelon coordinate with FWS regarding its adherence to the 2007 National Bald Eagle Management Guidelines?

Exelon response - *Most of the islands in the Braidwood Station cooling pond are located in areas managed by the IDNR under provisions of the Mazonia - Braidwood lease, which requires that IDNR assure compliance in the leased area with all environmental laws, including laws that protect wildlife. The term of the lease extends through the currently licensed term of Braidwood Station Unit 1, which includes a portion of the anticipated license renewal terms for both units. Accordingly, as long as the lease remains effective, if Exelon Generation personnel become aware of nesting bald eagles in the leased area, Exelon Generation will inform IDNR of*

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the observation, and request that IDNR undertake its responsibilities in accordance with the lease. If Exelon Generation personnel become aware of nesting bald eagles in the restricted access areas of the cooling pond (i.e., areas not managed by IDNR), Exelon Generation personnel will notify and coordinate with FWS regarding adherence to the 2007 National Bald Eagle Management Guidelines.

IDNR Comments on State-Listed Species

Has Exelon engaged with IDNR at any time (past or present) regarding the potential for State-listed species to be impinged or entrained during Braidwood operations?

Exelon response – During the time of initial Braidwood Station licensing (i.e., 1975 to 1986), the IDNR (then, the Illinois Department of Conservation) was an active participant in interagency negotiations that led to restrictions on the station’s rate of water withdrawal from the Kankakee River. Before permits allowing construction of the Braidwood intake structure were issued in 1977 by the Illinois Department of Transportation Division of Water Resources and the U.S. Army Corps of Engineers, Exelon Generation (then, Commonwealth Edison Company) agreed at the behest of the Illinois Department of Conservation (now IDNR) to limits on Braidwood’s water withdrawal rate from the Kankakee River during low flow periods as a measure to protect aquatic species in the river. In addition, IDNR’s concerns were considered by Illinois EPA during negotiations from 1979 through 1990 about conditions in the Braidwood Station National Pollutant Discharge Elimination System(NPDES) permit, including a condition to reduce intake impacts, which remains and reads as follows in the current NPDES permit, Special Condition 8: Intake impacts will be reduced by limiting pumping from the river during the peak entrainment period. For a four-week period (last three weeks in May and first week in June), pumping will be allowed only during the day (between one hour after sunrise and one hour before sunset). In addition, during the four-week period, pumping will be minimized during the day. Pumping will occur when needed to fill the freshwater holding pond and to maintain efficient operation of the cooling pond. In an extreme emergency, and upon immediate notification of the Agency, pumping could occur at night. Such pumping would cease as soon as the emergency was over. Records of all pumping during the four-week period will be maintained. Such records will include dates, number of pumps operating and start and end times.

The purpose of Special Condition 8 is to reduce impingement and entrainment impacts, especially with respect to pallid shiners and river redhorse, which are State-listed fish species.

Does Exelon intend to pursue an Incidental Take Authorization under the Illinois Endangered Species Protection Act for the State-listed species mentioned in IDNR’s letter (pallid shiner, river redhorse, western sand darter, American eel, sheepsnose mussel, black sandshell, spike, purple wartyback)?

Exelon response –The Braidwood Station NPDES Permit expires July 31, 2019. In the next renewal application, which must be submitted on or before January 31, 2019, Exelon Generation intends to submit information to the permitting agency (i.e., Illinois EPA) characterizing impingement mortality and entrainment, in accordance with 40 CFR §122.21(r)(1)(ii), EPA’s recently finalized rule governing NPDES permitting requirements for intake structures at existing facilities. During a recent conversation between Exelon Generation

and IDNR (Nathan Grider), IDNR agreed that concerns about possible impingement and entrainment of State-listed species at Braidwood Station as well as the question of whether a need exists for the Station to pursue an Incidental Take Authorization under the Illinois Endangered Species Protection Act could appropriately be addressed in the context of the Braidwood Station's next NPDES Permit renewal proceedings rather than the NRC license renewal proceedings.

The NRC did not find the State-threatened American eel or the State-threatened mudpuppy to be present in any of the preoperational or operational monitoring or in any impingement and entrainment studies associated with Braidwood. Does Exelon have any information that would suggest that either of these species are present in the vicinity of the site or that either species is at risk of impingement or entrainment?

Exelon response - *No.*

Exelon Comment on Pallid Shiner

Please provide copies of the two studies by EA Engineering, Science, and Technology, Inc. that show, as stated by Exelon, that the pallid shiner is increasing in abundance in the Kankakee River.

Exelon response – *Exelon is providing PDF files containing the requested documents with this response.*

FWS and EPA Comments on Northern Long-Eared Bat

Please describe the type and amount of tree clearing activities that Exelon expects to perform over the license renewal period (from now until the expiration of the renewed license, if granted). Has Exelon developed a tree-clearing management plan or guidance that would protect any northern long-eared bat habitat on site? Because Exelon, FWS, and NRC are in Endangered Species Act Section 7 informal consultation regarding northern long-eared bat, please provide copies of any past and future correspondences with other agencies regarding that species.

Exelon response – *Tree clearing has not been a recurring activity at Braidwood Station in the past, and it is not expected to be a recurring activity in the future. However, NRC Regulatory Guide (RG) 1.23, "Meteorological Monitoring Programs for Nuclear Power Plants," recommends that wind measurements should be made at locations and heights that avoid airflow modifications by obstructions such as large structures, trees, and nearby terrain. As part of its routine meteorological monitoring program, Braidwood Station retains a contractor to operate and maintain the Station's meteorological tower. During an annual site inspection on May 21, 2015, the contractor identified several individual trees and groups of trees in the vicinity of the meteorological tower that, considering the guidance in RG 1.23, it suggested for removal based on distance from the meteorological tower, height, and compass direction. Accordingly, Exelon Generation plans to remove the trees, as suggested in the contractor's report. When issued, the work order will include guidance to minimize effects on northern long-eared bats, such as restricting tree removal activities to months when bats would not be present.*

No past correspondence with agencies other than NRC has occurred regarding the northern long-eared bat at Braidwood Station.

FWS and EPA Comments on Endangered Sheepnose Mussel

Please send a copy of the proposal for mussel survey work to be conducted by Ecological Specialists Inc. (ESI) this summer. Because Exelon, FWS, and NRC are in Endangered Species Act Section 7 informal consultation regarding the endangered sheepnose mussel, please provide copies of any past and future correspondences with other agencies regarding that species.

Exelon response – Exelon is providing PDF files containing the following documents with this response.

- *2015.05.26_ Email to USFWS_RE_ US DOI Letter to NRC Regarding Draft Braidwood License Renewal SEIS*
- *2015.05.26_ Email from USFWS_Re_ US DOI Letter to NRC Regarding Draft Braidwood License Renewal SEIS*
- *2015.05.27_ Email to USFWS_RE_ US DOI Letter to NRC Regarding Draft Braidwood License Renewal SEIS*
- *2015.05.29_ Email to USFWS_ Exelon Generation -- Braidwood Station Mussel Survey*
- *2015.06.02_ Email from-to USFWS_RE_ Exelon Generation -- Braidwood Station Mussel Survey*
- *2015.06.05_ Email to NRC_RE_ U.S. Dept of Interior and IDNR Comments to NRC regarding Braidwood Station Lic Renewal Supplemental EIS - T&E Species*
- *2015.06.12_ Emails to-from USFWS_RE_ Exelon Generation -- Braidwood Station Mussel Survey*
- *2015.06.18_ Email to USFWS_RE_ Telephone Call on Friday, 6_18_2015*
- *2015.06.18_ Email from_ USFWS_Re_ Exelon Generation -- Braidwood Station Mussel Survey*
- *P14-055 Proposal - 2015_mussel_survey (without costs)*

While the informal consultation process regarding potential effects near the Braidwood Station intake and discharge structures on the endangered sheepnose mussel continues, Exelon Generation will provide FWS and NRC with copies of any correspondence with other agencies regarding that species.