



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

October 21, 2015

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

SUBJECT: ISSUANCE OF ENVIRONMENTAL SCOPING SUMMARY REPORT
ASSOCIATED WITH THE STAFF'S REVIEW OF THE FERMI 2 LICENSE
RENEWAL APPLICATION

Dear Mr. Kaminskas:

The U.S. Nuclear Regulatory Commission (NRC) conducted the environmental scoping process and solicited public comments from June 30 to August 29, 2014. This process determined the scope of the staff's environmental review of the application for renewal of the operating license for Fermi 2. The scoping process is the first step in the development of a Fermi 2-specific supplement to NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants" (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML13106A241, ML13106A242, and ML13106A244).

As part of the scoping process, the staff held two public environmental scoping meetings in Monroe, MI, on July 24, 2014, to solicit public input regarding the scope of the review. The staff also received written comments by letter, e-mail, and through www.Regulations.gov. At the conclusion of the scoping process, the staff prepared the enclosed environmental scoping summary report identifying comments received during the scoping period. In accordance with Section 51.29(b) of Title 10 of the *Code of Federal Regulations* (10 CFR), the staff will send a copy of the scoping summary report to all participants in the scoping process.

The transcripts of the public scoping meetings are available for public inspection via the NRC's ADAMS from any personal or public computer, including the NRC Public Document Room (PDR), located at One White Flint North, 11555 Rockville Pike, Rockville, Maryland 20852. The ADAMS Public Electronic Reading Room is accessible at <http://www.nrc.gov/reading-rm/adams.html>. The transcripts for the afternoon and evening meetings are listed under ADAMS Accession Nos. ML14254A465 and ML14254A470, respectively. Persons who encounter problems in accessing documents in ADAMS should contact the NRC's PDR reference staff by telephone at 1-800-397-4209 or 301-415-4737 or by e-mail at pdr.resource@nrc.gov.

V. Kaminskas

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If you have any questions concerning the staff's environmental review of this license renewal application, please contact the project manager, Ms. Elaine Keegan, by phone at 301-415-8517 or by e-mail at elaine.keegan@nrc.gov.

Sincerely,

/RA/

James G. Danna, Chief
Projects Branch 2
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket No. 50-341

Enclosure:
As stated

cc w/encl: Listserv

V. Kaminskas

-2-

If you have any questions concerning the staff's environmental review of this license renewal application, please contact the project manager, Ms. Elaine Keegan, by phone at 301-415-8517 or by e-mail at elaine.keegan@nrc.gov.

Sincerely,

/RA/

James G. Danna, Chief
Projects Branch 2
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket No. 50-341

Enclosure:
As stated

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RENEWAL APPLICATION

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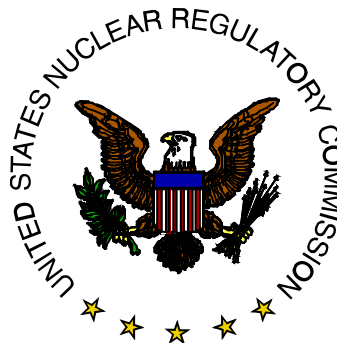
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**Environmental Impact Statement
Scoping Process**

Summary Report

**Fermi 2
Frenchtown Township, MI**

October 2015



**U.S. Nuclear Regulatory Commission
Rockville, Maryland**

ENCLOSURE

1 Introduction

The U.S. Nuclear Regulatory Commission (NRC) received an application from DTE Electric Company (DTE), dated April 24, 2014, for renewal of the operating license for Fermi 2. Fermi 2 is located in Frenchtown Township, MI. The purpose of this report is to provide a concise summary of the determinations and conclusions reached, including the significant issues identified, as a result of the scoping process in the NRC's environmental review of this license renewal application.

As part of the application, DTE submitted an Environmental Report (ER) (DTE 2014) prepared in accordance with Title 10 of the *Code of Federal Regulations* (CFR) Part 51, "Environmental protection regulations for domestic licensing and related regulatory functions," which contains the NRC requirements for implementing the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq., herein referred to as NEPA). The requirements for preparation and submittal of ERs to the NRC are outlined in 10 CFR 51.53(c)(3).

The requirements in Section 51.53(c)(3) were based upon the findings documented in NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants" (GEIS) (NRC 1996, 1999, 2013a). In the GEIS, the NRC staff identified and evaluated the environmental impacts associated with license renewal. After issuing a draft version of the GEIS, the NRC staff received and considered input from Federal and state agencies, public organizations, and private citizens before developing the final document. As a result of the assessments in the GEIS, a number of impacts were determined to be generic to all nuclear power plants (or, in some cases, to plants having specific characteristics such as a particular type of cooling system). These generic issues were designated as "Category 1" impacts. An applicant for license renewal may adopt the conclusions contained in the GEIS for Category 1 impacts unless there is new and significant information that may cause the conclusions to differ from those of the GEIS. Other impacts that require a site-specific review were designated as "Category 2" impacts and are required to be evaluated in the applicant's ER.

On June 30, 2014, the NRC initiated the scoping process for Fermi 2 by issuing a *Federal Register* notice (79 FR 36837). This *Federal Register* notice informed the public of the NRC staff's intent to prepare a plant-specific supplement to the GEIS regarding the application for renewal of the Fermi 2 operating license. The plant-specific supplement to the GEIS is also referred to as the supplemental environmental impact statement (SEIS). The SEIS will be prepared in accordance with 10 CFR Part 51.

The scoping process provides an opportunity for public participation to identify issues to be addressed in the SEIS and to highlight public concerns and issues. The notice of intent (NRC 2014b) identified the following objectives of the scoping process:

- Define the proposed action, which is to be the subject of the supplement to the GEIS;
- Determine the scope of the supplement to the GEIS and identify the significant issues to be analyzed in depth;
- Identify and eliminate from detailed study those issues that are peripheral or that are not significant;

- Identify any environmental assessments and other EISs that are being or will be prepared that are related to, but are not part of, the scope of the supplement to the GEIS being considered;
- Identify other environmental review and consultation requirements related to the proposed action;
- Indicate the relationship between the timing of the preparation of the environmental analyses and the Commission's tentative planning and decision-making schedule;
- Identify any cooperating agencies and, as appropriate, allocate assignments for preparation and schedules for completing the supplement to the GEIS to the NRC and any cooperating agencies; and
- Describe how the supplement to the GEIS will be prepared and include any contractor assistance to be used.

The NRC's proposed action is deciding whether to renew the Fermi 2 operating license for an additional 20 years.

The scope of the SEIS includes an evaluation of the environmental impacts of renewing the Fermi 2 license and of the reasonable alternatives to license renewal. The "Scoping Comments and Responses" section of this report includes specific issues identified by the comments. The subsequent NRC responses explain whether the issues will be addressed in the SEIS and, if so, where in the report they will likely be addressed.

Throughout the scoping process, the NRC staff identified and eliminated peripheral issues. This report provides responses to comments that were determined to be out of the scope of this review. Those that were significant or have not been covered by another environmental review will be evaluated in detail and documented in the appropriate sections of the SEIS for the Fermi 2 license renewal.

In parallel with its NEPA review, the NRC staff is conducting section 7 consultation under the Endangered Species Act of 1973 (ESA) to ensure the protection of listed species and designated critical habitat that may be affected by the proposed license renewal. The regulations that implement section 7 (50 CFR 402, "Interagency cooperation—Endangered Species Act of 1973, as amended") describe the consultation procedures that Federal agencies must follow in order to fully comply with the act. Depending on the project, the NRC may need to consult with the U.S. Fish and Wildlife Service (FWS), the National Marine Fisheries Service (NMFS), or both. In the case of Fermi 2, no species under NMFS's jurisdiction occur within the action area; therefore, the NRC staff is only consulting with the FWS.

In accordance with 36 CFR 800.8, "Coordination with the National Environmental Policy Act," the NRC will coordinate compliance with Section 106 of the National Historic Preservation Act (NHPA) through the requirements of NEPA. NRC staff has initiated consultation with the Advisory Council on Historic Preservation, the Michigan State Historic Preservation Office, and federally-recognized tribes with historic ties to the area surrounding the Fermi 2 site.

The NRC staff expects to publish the draft SEIS in October 2015. The SEIS will be prepared by NRC staff with technical editing contract support from Idoneous Consulting.

The NRC invited the applicant; Federal, state, and local government agencies; Indian tribal governments; local organizations; and individuals to participate in the scoping process by providing oral comments at the scheduled public meetings or by submitting written comments before the end of the scoping comment period on August 29, 2014. The scoping process included two public meetings which were held on July 24, 2014, at Monroe County Community College, 1555 South Raisinville Road, Monroe, MI. The NRC staff issued press releases, purchased newspaper advertisements, and distributed flyers locally to advertise these meetings. Approximately 110 people attended the meetings. Each session began with NRC staff members providing a brief overview of the license renewal process and the NEPA environmental review process. Following the NRC staff's prepared statements, the floor was opened for public comments. Of the 57 attendees, 46 provided oral comments that were recorded and transcribed by a certified court reporter. The NRC staff issued a summary of the scoping meetings on September 18, 2014 (NRC 2014e).

In addition to the comments received at the meetings, the NRC also received 27 letters with comments about the review. All documents associated with this scoping process are available for public inspection in the NRC Public Document Room (PDR), located at One White Flint North, 11555 Rockville Pike, Rockville, Maryland 20852, or from the NRC's Agencywide Documents Access and Management System (ADAMS). The ADAMS Public Electronic Reading Room is accessible at <http://www.nrc.gov/reading-rm/adams.html>. Persons who encounter problems in accessing documents in ADAMS should contact the NRC's PDR Reference staff by telephone at 1-800-397-4209 or 301-415-4737 or by e-mail at pdresource@nrc.gov. The ADAMS accession number for each document is listed below in Table 1.

At the conclusion of the scoping period, the NRC staff reviewed the transcripts (NRC 2014c, 2014d), meeting notes, and all written material received in order to identify individual comments. Each comment was marked with a unique identifier consisting of the Commenter ID (specified in Table 1), a letter code corresponding to the source document (also specified in Table 1), and a comment number. This unique identifier allows each comment to be traced back to the transcript, letter, or e-mail in which the comment was identified. Comments were consolidated and categorized according to the topic within the proposed SEIS or according to the general topic if outside the scope of the GEIS. Once comments were grouped according to subject area, the NRC staff determined the appropriate action for the comment. The action or resolution for each comment is described in the NRC staff's responses within this report.

1.1 Scoping Participants

Table 1 identifies the individuals providing comments and the assigned Commenter ID. Individuals are listed alphabetically, along with the source document through which the comment was submitted.

Table 1. Individuals Providing Comments During the Scoping Comment Period

Commenter	Affiliation (If Stated)	Commenter ID	Comment Source	ADAMS Accession Number
Gabriel Agboruche	DTE Electric Company	001	Evening Transcript (CC)	ML14254A470
Anonymous	None given	002	Comment letter (S)	ML14252A172
Mary Ann Baier	None given	003	Comment letter (O)	ML14252A142
Sandra Bihn	Lake Erie Waterkeeper	004	Comment letter (U)	ML14252A175
Paul Braunlich	Frenchtown Charter Township Resort District Authority	005	Afternoon Transcript (BB)	ML14254A465
Greg Brede	None given	006	Afternoon Transcript (BB)	ML14254A465
Barry Buschmann	The Mannik & Smith Group	007	Afternoon Transcript (BB)	ML14254A465
Joanne Cantoni	None given	008	Comment letter (N)	ML14252A141
Corinne Carey	Don't Waste Michigan	009	Comment letter (M)	ML14252A140
Connie Carroll	United Way of Monroe County	010	Afternoon Transcript (BB)	ML14254A465
Robert Clark	City of Monroe	011	Afternoon Transcript (BB)	ML14254A465
Jessie Pauline Collins	Citizens' Resistance at Fermi 2	012	Afternoon Transcript (BB)	ML14254A465
			Evening Transcript (CC)	ML14254A470
			Comment letter (F)	ML14234A189

Commenter	Affiliation (If Stated)	Commenter ID	Comment Source	ADAMS Accession Number
			Comment letter (L)	ML14252A139
Valerie Crow	None given	013	Evening Transcript (CC)	ML14254A470
Eric Dover	DTE Electric Company	014	Afternoon Transcript (BB)	ML14254A465
			Evening Transcript (CC)	ML14254A470
Nancy Dover	None given	015	Afternoon Transcript (BB)	ML14254A465
Rosemary Doyle	None given	016	Comment letter (R)	ML14252A171
Michelle Dugan	Monroe County Chamber of Commerce	017	Comment letter (E)	ML14234A188
Bill Dyer	Utilities Workers Union of America, Local 223 - Fermi Division	018	Afternoon Transcript (BB)	ML14254A465
Mark Farris	None given	019	Afternoon Transcript (BB)	ML14254A465
			Evening Transcript (CC)	ML14254A470
			Comment letter (Z)	ML14252A186
Lynne Goodman	DTE Electric Company	020	Evening Transcript (CC)	ML14254A470
Martha Gruelle	Wildlife Habitat Council	021	Afternoon Transcript (BB)	ML14254A465
Keith Gunter	Alliance to Halt Fermi 3	022	Afternoon Transcript (BB)	ML14254A465

Commenter	Affiliation (If Stated)	Commenter ID	Comment Source	ADAMS Accession Number
Taiya Himebauch	DTE Electric Company	023	Afternoon Transcript (BB)	ML14254A465
Sean Honell	DTE Electric Company	024	Afternoon Transcript (BB)	ML14254A465
Carol Izant	Alliance to Halt Fermi 3	025	Afternoon Transcript (BB)	ML14254A465
			Evening Transcript (CC)	ML14254A470
			Comment letter (V)	ML14252A176
Kevin Kamps	Beyond Nuclear	026	Afternoon Transcript (BB)	ML14254A465
			Evening Transcript (CC)	ML14254A470
Hedwig Kaufman	None given	027	Evening Transcript (CC)	ML14254A470
Michael Keegan	Don't Waste Michigan	028	Afternoon Transcript (BB)	ML14254A465
			Comment letter (K)	ML14252A138
			Comment letter (Y)	ML14252A180
Manfred Klein	None given	029	Evening Transcript (CC)	ML14254A470
Dustin Krasny	Office of Contgressman Tim Walberg	030	Afternoon Transcript (BB)	ML14254A465
Tim Lake	Monroe County Business Development Corporation	031	Evening Transcript (CC)	ML14254A470

Commenter	Affiliation (If Stated)	Commenter ID	Comment Source	ADAMS Accession Number
Bobby Lambert	Monroe County Board of Commissioners	032	Evening Transcript (CC)	ML14254A470
Ron Lankford	None given	033	Afternoon Transcript (BB)	ML14254A465
Bill LaVoy	Michigan House of Representatives	034	Evening Transcript (CC)	ML14254A470
Vic and Gail Macks	None given	035	Comment letter (J)	ML14234A339
Archana Manoharan	American Nuclear Society/DTE Electric Company	036	Afternoon Transcript (BB)	ML14254A465
Bonnie Masserant	DTE Electric Company	037	Evening Transcript (CC)	ML14254A470
Ed McArdle	Sierra Club - Michigan Chapter	038	Comment letter (AA)	ML14259A341
Jim McDevitt	Frenchtown Charter Township	039	Comment letter (D)	ML14216A376
Rich McDevitt	DTE Electric Company	040	Afternoon Transcript (BB)	ML14254A465
			Evening Transcript (CC)	ML14254A470
Stephen McNew	Monroe County Intermediate School District	041	Comment letter (C)	ML14219A583
Floreine Mentel	Former Monroe County Commissioner	042	Afternoon Transcript (BB)	ML14254A465
Jeanne Micka	Monroe County Garden Club	043	Afternoon Transcript (BB)	ML14254A465

Commenter	Affiliation (If Stated)	Commenter ID	Comment Source	ADAMS Accession Number
Richard Micka	None given	044	Afternoon Transcript (BB)	ML14254A465
			Comment letter (G)	ML14234A190
Jessica Miskena	None given	045	Evening Transcript (CC)	ML14254A470
Sandy Mull	Southern Wayne County Regional Chamber of Commerce	046	Afternoon Transcript (BB)	ML14254A465
Tracy Oberleiter	Monroe County Economic Development Corporation	047	Afternoon Transcript (BB)	ML14254A465
Phyllis Oster	None given	048	Comment letter (Q)	ML14252A170
Sandy Pierce	Monroe Center for Healthy Aging	049	Afternoon Transcript (BB)	ML14254A465
Joseph Plona	DTE Electric Company	050	Afternoon Transcript (BB)	ML14254A465
Emilio Ramos	None given	051	Evening Transcript (CC)	ML14254A470
Ken Richards	None given	052	Comment letter (T)	ML14252A173
Randy Richardville	Michigan State Senator	053	Comment letter (B)	ML14219A580
Angela Rudolph	URS	054	Afternoon Transcript (BB)	ML14254A465
David Schonberger	None given	055	Afternoon Transcript (BB)	ML14254A465
			Evening Transcript (CC)	ML14254A470

Commenter	Affiliation (If Stated)	Commenter ID	Comment Source	ADAMS Accession Number
			Comment letter (X)	ML14252A178
Robert Simpson	None given	056	Comment letter (P)	ML14252A143
			Comment letter (W)	ML14252A177
Phillip Skarbek	DTE Electric Company	057	Afternoon Transcript (BB)	ML14254A465
			Evening Transcript (CC)	ML14254A470
Jerry Sobczak	DTE Shareholders United	058	Evening Transcript (CC)	ML14254A470
Robert Tompkins	Detroit Edison Alliance of Retirees	059	Comment letter (A)	ML14205A009
Tim Walberg	U.S. Congress	060	Comment letter (I)	ML14234A192
Emily Wood	Women in Nuclear/DTE Electric Company	061	Afternoon Transcript (BB)	ML14254A465
			Evening Transcript (CC)	ML14254A470
Grace Yackee	Monroe County Community College	062	Afternoon Transcript (BB)	ML14254A465
Dale Zorn	Michigan State Representative	063	Evening Transcript (CC)	ML14254A470
			Comment letter (H)	ML14234A191

1.2 Scoping Comments

The process for addressing the comments and suggestions received as part of the scoping process is discussed in this section. The disposition of each comment is discussed in Section 2.

The comments received during the scoping period have been grouped into the following general categories:

1. air quality;
2. alternatives to license renewal;
3. aquatic resources;
4. climate change;
5. groundwater resources;
6. historical and cultural resources;
7. human health;
8. postulated accidents, including severe accident mitigation alternatives (SAMA);
9. waste management;
10. special status species and habitats;
11. terrestrial resources;
12. support for nuclear power or the license renewal for Fermi 2;
13. opposition to nuclear power or the license renewal for Fermi 2;
14. license renewal and NEPA process; and
15. other comments outside the scope of NRC's environmental review.

The preparation of the SEIS will take into account all of the relevant issues raised during the scoping process. The SEIS will address both Category 1 and 2 issues, along with any new information identified as a result of the scoping process. The SEIS will rely on conclusions supported by information in the GEIS for Category 1 issues and will include analysis of Category 2 issues and any new and significant information (NRC 2013a). The NRC will issue a draft SEIS for public comment. The comment period will offer the next opportunity for interested Federal, state, and local government agencies; Indian tribal governments; local organizations; the applicant; and other members of the public to provide input to the NRC's environmental review process. The comments received on the draft SEIS will be considered in the preparation of the final SEIS. The final SEIS, along with the staff's safety evaluation report (SER), will provide much of the basis for the NRC's decision on DTE's application to renew the license of Fermi 2.

2 Scoping Comments Considered during the SEIS and Responses

2.1 Air Quality: The following comment is related to air quality.

Comment: 029-CC-6

Response: *The NRC staff will describe the air quality around Fermi 2 in Chapter 3 of the draft SEIS and will address the impacts to air quality and meteorology from renewing the Fermi 2 license in Chapter 4. An expanded response to this comment is included in Appendix A of the draft SEIS.*

2.2 Alternatives to License Renewal: The following comments are related to alternative energy sources other than license renewal.

Comments: 012-CC-4, 012-F-4, 019-CC-8, 019-CC-9, 025-CC-3, and 028-K-5

Response: *The NRC staff will identify and evaluate reasonable alternatives to the renewal of the Fermi 2 license in Chapter 2 of the draft SEIS. This includes the option of not renewing the Fermi 2 license, referred to as the “no-action alternative.” Chapter 4 of the draft SEIS will compare the impacts of renewing the operating license of renewing the Fermi 2 license to the environmental impacts of alternatives. Expanded responses to these comments are included in Appendix A of the draft SEIS.*

2.3 Aquatic Ecology: The following comments are related to aquatic ecology.

Comments: 004-U-1, 012-BB-3, 012-CC-2, 012-F-2, 012-L-1, 025-V-13, 025-V-17, 028-K-16, 028-Y-4, 029-CC-3, and 035-J-1

Response: *The NRC staff will describe the aquatic environment around Fermi 2 in Chapter 3 of the draft SEIS and will address the impacts to aquatic ecology from renewing the Fermi 2 license in Chapter 4. Expanded responses to these comments are included in Appendix A of the draft SEIS.*

2.4 Climate Change: The following comments are related to climate change.

Comments: 019-CC-5 and 038-AA-5

Response: *The NRC staff will describe the environment around Fermi 2 in Chapter 3 of the draft SEIS and will address the impacts from climate change on the environment and impacts to climate change from renewing the Fermi 2 license in Chapter 4 of the draft SEIS. Expanded responses to these comments are included in Appendix A of the draft SEIS.*

2.5 Groundwater Resources: The following comments are related to groundwater resources.

Comments: 012-CC-5, 012-F-5, 012-L-2, and 019-BB-2

Response: *The NRC staff will describe the environment around Fermi 2 as it pertains to groundwater resources in Chapter 3 of the draft SEIS and will address the impacts to groundwater resources from renewing the Fermi 2 license in Chapter 4. Expanded responses to these comments are included in Appendix A of the draft SEIS.*

2.6 Historical and Cultural Resources: The following comments are related to historical and archaeological resources.

Comments: 012-CC-3, 012-F-3, 025-V-19, and 028-K-6

Response: *The NRC staff will describe the cultural background and the known historic and cultural resources found on and in the vicinity of Fermi 2 in Chapter 3 of the draft SEIS and will address the impacts to historic and cultural resources from renewing the Fermi 2 license in Chapter 4 of the draft SEIS. Expanded responses to these comments are included in Appendix A of the draft SEIS.*

2.7 Human Health

The following comments are related to human health.

Comment: 025-V-12, 028-K-15, 035-J-3, 035-J-4, 038-AA-1, and 055-CC-1

Response: *The NRC staff will describe the human health risks from Fermi 2 in Chapter 3 of the draft SEIS and will address the impacts to human health from renewing the Fermi 2 license in Chapter 4. Expanded responses to these comments is included in Appendix A of the draft SEIS.*

2.8 Postulated Accidents, including SAMA

The following comments express concerns relating to postulated accidents and severe accident mitigation analysis (SAMA).

Comments: 003-O-3, 003-O-4, 022-BB-3, 025-V-4, 025-V-9, 025-V-10, 026-CC-3, 028-BB-3, 028-K-1, 028-K-12, 028-K-4, and 055-CC-3

Response: *The NRC staff will address postulated accidents and SAMA in Chapter 4 and Appendix F of the draft SEIS. Expanded responses to these comments are included in Appendix A of the draft SEIS.*

2.9 Waste Management: The following comments are related to waste management.

Comments: 003-O-1, 003-O-2, 013-CC-1, 019-CC-1, 019-CC-4, 025-BB-2, 025-CC-6, 025-V-15, 026-BB-2, 026-CC-4, 027-CC-1, 028-BB-4, 028-K-2, 028-K-3, 029-CC-5, 035-J-6, 038-AA-2, 038-AA-3, and 038-AA-4

Response: *The NRC staff will describe the management of radioactive waste in Chapter 3 of the draft SEIS and will address the impacts to radioactive waste from renewing the Fermi 2 license in Chapter 4 of the draft SEIS. Expanded responses to these comments are included in Appendix A of the draft SEIS.*

2.10 Special Status Species and Habitats: The following comments are related to special status species and habitats.

Comments: 025-V-16 and 028-Y-2

Response: *The NRC staff will discuss the species and habitats that are Federally protected under the Endangered Species Act of 1973 and the Magnuson–Stevens Fishery Conservation and Management Reauthorization Act, referred to as special status species and habitats, in Chapter 3 of the draft SEIS. The NRC staff will address the impacts to special status species and habitats from renewing the Fermi 2 license in Chapter 4 of the draft SEIS. Expanded responses to these comments are included in Appendix A of the draft SEIS.*

2.11 Terrestrial Resources: The following comments are related to terrestrial resources

Comments: 012-F-7, 028-Y-1, and 028-Y-3

Response: *The NRC staff will describe the terrestrial environment around Fermi 2 in Chapter 3 of the draft SEIS and will address the impacts to terrestrial ecology from renewing the Fermi 2 license in Chapter 4. Expanded responses to these comments are included in Appendix A of the draft SEIS.*

3 Scoping Comments Outside the Scope of the Environmental Review

The comments listed in the following sections are outside of the scope of the environmental review for the Fermi 2 license renewal and will not be considered further.

3.1 Support for Nuclear Power: The following comments express support for nuclear power, DTE, or the Fermi 2 license renewal. The commenters cite the socioeconomic benefits—including the negative benefits should the Fermi 2 license not be renewed, the reliability of the electrical power generated by Fermi 2, the unreliability of alternative energy sources, carbon-free generation, the need for Fermi 2 to be part of the power generation mix, and DTE’s environmental stewardship and support for the environment as reasons for their support.

Comments: 001-CC-1, 005-BB-1, 006-BB-1, 007-BB-1, 010-BB-1, 011-BB-1, 014-BB-1, 014-CC-1, 015-BB-1, 017-E-1, 018-BB-1, 020-CC-1, 021-BB-1, 023-BB-1, 024-BB-1, 030-BB-1, 031-CC-1, 032-CC-1, 034-CC-1, 036-BB-1, 037-CC-1, 039-D-1, 040-BB-1, 040-CC-1, 041-C-1, 042-BB-1, 043-BB-1, 044-BB-1, 044-G-1, 046-BB-1, 047-BB-1, 049-BB-1, 050-BB-1, 051-CC-1, 053-B-1, 054-BB-1, 057-BB-1, 057-CC-1, 058-CC-1, 059-A-1, 060-I-1, 061-BB-1, 061-CC-1, 062-BB-1, 063-CC-2, 063-CC-1, 063-CC-2, 063-CC-3, 063-CC-4, 063-H-1, 063-H-2, 063-H-3 and 063-H-4

Response: *These comments are general in nature and provide no new and significant information. As such, these comments will not be evaluated further in the development of the SEIS. However, to the extent that these comments refer generally to the socioeconomic impacts from license renewal, the alternatives to license renewal—including the impacts of not renewing the Fermi 2 license, the impacts to greenhouse gases, and programs in place at Fermi 2 to protect aquatic and terrestrial resources as reasons for support, the NRC staff will describe the environment around Fermi 2 as it pertains to these issues in Chapter 3 of the draft SEIS. The NRC staff will address the impacts from renewing the Fermi 2 license as they pertain to these issues in Chapter 4 of the draft SEIS. To the extent that comments cite the need for the power generated by Fermi 2, the need for power is considered to be outside the scope of license renewal (10 CFR 51.95 (c)(2)). The purpose and need for the proposed action (issuance of a renewed license) is to provide an option that allows for power generation capability beyond the term of a current nuclear power plant operating license to meet future*

system generating needs, as such needs may be determined by other energy-planning decisionmakers. This definition of purpose and need reflects the NRC's recognition that, unless there are findings in the safety review required by the Atomic Energy Act or findings in the NEPA environmental analysis that would lead the NRC to reject a license renewal application, the NRC does not have a role in the energy-planning decisions of state regulators and utility officials as to whether a particular nuclear power plant should continue to operate.

3.2 Opposition to Nuclear Power or the License Renewal for Fermi 2: The following comments generally express opposition to nuclear power, DTE, or the Fermi 2 license renewal for a variety of reasons. The commenters cite the potential for accidents—with several comments referring to the partial fuel melt incident at Fermi 1, the safety of spent nuclear fuel, the effects of routine radioactive releases, the cost-effectiveness and financial viability of nuclear power, decommissioning costs, the lack of need for the power generated by Fermi 2, the need for subsidies—including the coverage provided by the Price-Anderson Act, the attractiveness and viability of alternatives, the negative effects of Fermi 2 on the Michigan economy, the fact that Germany is transitioning away from nuclear power, the potential for mishaps, such as the Davis-Besse reactor head issue, the continuing effects of Fukushima, and opposition to a Canadian waste disposal project as reasons for their opposition. One comment stated opposition to nuclear power, while including a list of demands. These demands included: increased plant security; expediting transfer of spent fuel to dry casks; requiring open-frame, low-density spent fuel pool configurations; requiring hardened onsite storage (HOSS), reduction of allowable radioactive releases to the environment; enhanced environmental monitoring by the State; cooling system replacement; updated emergency planning requirements—including expanding the emergency planning zone (EPZ); installation of hardened, filtered vents; compliance with technical specifications for new reactors; improved regulatory performance from the NRC, citing consideration of severe accidents in spent fuel pools as an example; and an independent evaluation of the need for power from Fermi 2.

Comments: 002-S-1, 008-N-1, 009-M-1, 012-BB-1, 012-BB-2, 012-BB-4, 016-R-1, 019-BB-1, 019-BB-3, 019-CC-10, 019-CC-2, 019-CC-3, 019-CC-7, 019-Z-1, 022-BB-1, 022-BB-2, 022-BB-4, 025-CC-1, 025-V-1, 025-V-3, 025-V-5, 025-V-6, 025-V-7, 025-V-8, 025-V-18, 026-BB-1, 026-BB-3, 026-CC-1, 026-CC-2, 028-BB-7, 028-K-8, 029-CC-1, 029-CC-2, 029-CC-4, 029-CC-7, 035-J-7, 045-CC-1, 048-Q-1, 052-T-1, 055-X-1, 056-P-1, and 056-W-1

Response: *These comments are general in nature and provide no new and significant information. As such, these comments will not be evaluated further in the development of the SEIS. However, to the extent that these comments refer generally to the socioeconomic impacts from license renewal; the alternatives to license renewal; the potential for, and consequences of an accident at Fermi 2; the safety of spent nuclear fuel; and the effects of routine radioactive releases, the NRC staff will describe the environment around Fermi 2 as it pertains to these issues in Chapter 3 of the draft SEIS. The NRC staff will address the impacts from renewing the Fermi 2 license as they pertain to these issues in Chapter 4 of the draft SEIS.*

To the extent these comments make reference to the need for power from Fermi 2, the financial viability of Fermi 2, or the need for subsidies, these issues are considered to be outside the scope of license renewal (10 CFR 51.95 (c)(2)). The purpose and need for the proposed action (issuance of a renewed license) is to provide an option that allows for power generation capability beyond the term of a current nuclear power plant operating license to meet future system generating needs, as such needs may be determined by other energy-planning decisionmakers. Similarly, the decision whether or not to pursue nuclear power as a power generation source (e.g., as is happening in Germany) is a decision that is made by other

energy-planning decisionmakers and is outside the scope of this review. With regard to the Price-Anderson Act, this Act is a Federal law that governs liability-related issues for all nonmilitary nuclear facilities constructed in the United States before 2026. The main purpose of the Act is to provide prompt and orderly compensation to the public who may incur damages from a nuclear incident, no matter who might be liable. The Act provides “omnibus” coverage—the same protection available for a covered licensee or contractor indemnifies any persons who may be legally liable, regardless of their identity or relationship to the licensed activity. Because the Act channels the obligation to pay compensation for damages to the licensee, any party with a claim only needs to bring its claim to the licensee or contractor.

On the issue of decommissioning costs, NRC regulations at 10 CFR 50.33(k) and 50.75 require each power reactor licensee to provide reasonable assurance that funds will be available for decommissioning and prescribes acceptable methods for providing financial assurance and the minimum dollar amounts, adjusted annually, to demonstrate such reasonable assurance. A licensee’s ability to demonstrate financial assurance for decommissioning costs is reviewed by the NRC through its ongoing reactor oversight process and is outside the scope of a license renewal review, which is focused on assessing an applicant’s capability to adequately manage the effects of aging during the period of extended operation.

With regard to the potential for mishaps, such as the reactor vessel head degradation issue at Davis-Besse, the NRC provides continuous oversight of nuclear power plants through its ongoing reactor oversight process to verify that they are being operated and maintained in accordance with NRC regulations. This oversight includes having full-time NRC inspectors located at the plant and periodic safety inspections conducted by NRC inspectors based in an NRC Regional Office. The inspections look at a licensee’s compliance with NRC’s regulations, which include the following: plant safety (routine and accident scenarios), radiation protection of plant workers and members of the public, radioactive effluent releases, radiological environmental monitoring, emergency preparedness, radioactive waste storage and transportation, quality assurance, and training. Should the NRC discover an unsafe condition, or that a licensee is not complying with its licensing basis, the NRC has full authority to take whatever action is necessary to protect public health and safety.

The continuing effects of the accident at Fukushima is outside the scope of this license renewal environmental review, which is focused on evaluating the environmental impacts of renewing the Fermi 2 license for an additional 20 years. In response to the accident at Fukushima, the NRC has taken significant action to enhance the safety of reactors in the United States based on the lessons learned from this accident. Because lessons learned from this accident are applicable to many nuclear power plants in the US, the NRC has established a process, which is separate from the license renewal process, for the identification and implementation of lessons learned. Refer to the NRC Japan Lessons Learned website (<http://www.nrc.gov/reactors/operating/ops-experience/japan-dashboard.html>) for a current status of these activities.

Ontario Power Generation’s proposed Deep Geologic Repository project to store low and intermediate-level waste adjacent to Lake Huron, along with any stated opposition to it, is outside the scope of the NRC’s license renewal. For a current status of the Canadian government’s review of environmental impacts of this project, refer to the following website: <http://www.ceaa-acee.gc.ca/050/details-eng.cfm?evaluation=17520>.

Several of the changes demanded in comments—increased plant security, reduction of allowable radioactive releases, enhanced environmental monitoring, and updated emergency planning requirements—point to perceived inadequacies in the NRC’s current regulations and are outside the scope of the NRC’s environmental review of the proposed license renewal for Fermi 2. Members of the public can submit petitions for rulemaking to request the NRC to develop, change, or rescind any of its regulations. Section 2.802 of 10 CFR (10 CFR 2.802) describes the petition for rulemaking process. This process allows anyone to petition the NRC to revise the regulations. Depending on the results of its evaluation of the request, the NRC may modify existing regulations, add new regulations, or rescind a regulation. Information on submitting a petition for rulemaking is available on the NRC’s website at <http://www.nrc.gov/aboutnrc/regulatory/rulemaking/petition-rule.html>.

Two of the issues identified—installation of hardened, filtered vents and HOSS—are currently being addressed by the NRC through the rulemaking process and are outside the scope of the NRC’s environmental review. Current status, as well as all information submitted in support of the ongoing rulemakings, can be found going to www.regulations.gov and searching for the docket numbers NRC-2013-0075 (filtered vents) or NRC-2009-0558 (HOSS).

On the issue of requiring expediting transfer of spent fuel to dry casks and low-density spent fuel pool loading, the NRC has previously evaluated the benefit of expediting transfer of spent fuel to achieve low-density spent fuel pool configurations. Based on the NRC staff’s evaluation of the issue, the Commission decided not to pursue further evaluation of the expedited transfer of spent fuel from pools to dry storage (NRC 2014a). The NRC staff’s conclusion, which was provided to the Commission in COMSECY–13–0030 (NRC 2013b), is that the “expedited transfer of spent fuel to dry cask storage would provide only a minor or limited safety benefit...and that its expected implementation costs would not be warranted.”

On the issue of requiring a new cooling system for Fermi 2, the NRC does not have the regulatory authority to require DTE to install a new cooling system in order to mitigate impacts to the aquatic environment. Implementation of the provisions of the Clean Water Act, including those regarding cooling system operations and design specifications, is the responsibility of the U.S. Environmental Protection Agency (EPA). In many cases, as is the case in Michigan, the EPA delegates such authority to the individual States. To operate a nuclear power plant, licensees must comply with the Clean Water Act, including associated requirements imposed by the EPA or the State, as part of the National Pollutant Discharge Elimination System (NPDES) permitting system under Section 402 of the Clean Water Act and State water quality certification requirements under Section 401 of the Clean Water Act. The EPA or the State, not the NRC, sets the limits of effluents and operational parameters in plant-specific NPDES permits.

With regard to requiring compliance with technical specifications for new reactors, the NRC believes that requirements already in place for operating licenses are comprehensive and robust enough to assure continued safe operation. The safe operation of nuclear power plants is not limited to license renewal but is dealt with on an ongoing basis as a part of a current operating license. When new information becomes available that may impact an operating plant’s design basis, it is evaluated as part of the NRC’s ongoing reactor oversight process, which is separate from license renewal.

As for improved regulatory performance, the NRC staff evaluated the issue cited in comments—as an example, consideration of severe accidents in spent fuel pools—in the 2013 revision to the GEIS. Based on this evaluation, this GEIS concludes that the environmental impacts from

accidents involving SFPs are comparable to those from the reactor accidents at full power that were evaluated in the 1996 GEIS, and as such, SFP accidents do not warrant separate evaluation.

3.3 Comments Related to the License Renewal and NEPA Process: The following comments are related to the NRC's NEPA process, waste confidence, decommissioning, and contentions that were submitted for license renewal.

Comments: 12-L-3, 012-L-4, 019-CC-6, 025-BB-1, 025-CC-C, 025-CC-4, 025-CC-5, 025-V-11, 025-V-14, 028-BB-6, 028-K-7, 028-K-9, 028-K-10, 028-K-13, 028-K-14, 028-K-17,

Response: *These comments are general in nature and provide no new and significant information. These comments will not be evaluated further in the development of the SEIS. Several of the commenters were questioning why DTE had submitted a license renewal application for Fermi 2, when Fermi 2's operating license won't expire until 2025. The NRC regulations at 10 CFR 54.17(c) allow for an application for license renewal to be submitted no earlier than 20 years before the expiration of the current license. A major consideration for seeking license renewal so far in advance of the expiration date of the current license is that it takes about 10 years to design and construct major new generating facilities and long lead times are required by energy-planning decision-makers. Additionally, the NRC regulations at 10 CFR 2.109, state that if a licensee submits a renewal applications no less than 5 years before the existing license expires, then the existing license will be deemed not to have expired if the license renewal application review takes longer than 5 years. It is a licensee's decision as to when to submit a license renewal application.*

A number of these comments reiterate contentions filed in response to the Fermi 2 license renewal application opportunity to request a hearing notice published in the Federal Register (79FR 34787) on June 18, 2014. On August 18, 2014, Citizens Resistance at Fermi 2 (CRAFT) submitted a request for a hearing and 14 proposed contentions. Also on August 18, 2014, Don't Waste Michigan, Citizens Environmental Alliance of Southwestern Ontario, and Beyond Nuclear (Joint Petitioners) submitted a request for a hearing and four proposed contentions. On February 6, 2015, the Atomic Safety and Licensing Board (ASLB) granted the requests for a hearing and denied 12 of CRAFT's contentions and 3 of Joint Petitioners contentions. The ASLB admitted two of the proposed contentions from CRAFT and one from Joint Petitioners. However, the three contentions admitted by the ASLB were not as submitted by the petitioners but were narrowed and refined by the ASLB. The licensee, DTE Electric Company, appealed the ASLB's ruling to the NRC Commission. In CLI-15-08, dated September 8, 2015, the Commissioners overturned the ASLB's ruling on the three admitted contentions. The NRC's regulations at 10 CFR 2.309(f)(1) set forth six factors a contention must meet to be admitted. The Commission found that the ASLB erred in narrowing and refining the three admitted contention and therefore the Commission reversed the ASLB's ruling admitting the three contentions and directed the ASLB to terminate the proceeding.

Several of the comments are related to the waste confidence decision and suggest that the NRC does not have the authority to issue renewed licenses for nuclear power because the waste confidence rule is inadequate. NUREG-2157, Generic Environmental Impact Statement for Continued Storage of Spent Nuclear Fuel (published August 2014), generically determines the environmental impacts of continued storage, including those impacts identified in the remand by the Court of Appeals in the New York v. NRC decision, and provides a regulatory basis for a revision to 10 CFR 51.23 that addresses the environmental impacts of continued

storage for use in future NRC environmental reviews. In this context, "the environmental impacts of continued storage" means those impacts that could occur as a result of the storage of spent nuclear fuel at at-reactor and away-from-reactor sites after a reactor's licensed life for operation and until a permanent repository becomes available. Because the timing of repository availability is uncertain, the continued storage GEIS analyzes potential environmental impacts over three possible timeframes: a short-term timeframe, which includes 60 years of continued storage after the end of a reactor's licensed life for operation; an additional 100-year timeframe (60 years plus 100 years) to address the potential for delay in repository availability; and a third, indefinite timeframe to address the possibility that a repository never becomes available. All potential impacts in each resource area are analyzed for each continued storage timeframe. On September 29, 2014, number of environmental groups filed new and amended contentions, and motions to suspend licensing actions related to waste confidence. As discussed in Commission Memorandum and Order, CLI-15-4 (February 26, 2015), the Commission denied the proposed contentions and motions. Additionally, the Commission determined that the Atomic Energy Act allows the NRC staff to continue issuing new and renewed licenses.

3.4 Other Comments Outside the Scope of NRC's Environmental Review: The following comments are related to the current operating issues such as station blackout, in-service inspections, and emergency preparedness and evacuations.

Comments: 012-CC-1, 012-CC-6, 012-F-1, 012-F-6, 025-V-2, 028-BB-1, 028-BB-2, 028-BB-5, 028-K-11, 033-BB-1, 035-J-2, 035-J-5, 055-BB-1, 055-CC-2, 055-CC-4,

Response: *These comments are general in nature and provide no new and significant information. As such, these comments will not be evaluated further in the development of the SEIS. These comments are related to the current licensing basis (CLB) of the nuclear power plant. The CLB is defined as the particular set of NRC requirements applicable to a licensed nuclear power plant and includes the NRC regulations, NRC Orders, safety and environmental license conditions, and technical specifications. Overseeing the safe operations of nuclear plants is an ongoing effort. Each nuclear plant has at least two NRC resident inspectors who scrutinize day-to-day activities at nuclear power plants and ensure that the plant operator is adhering to the plant's CLB. The NRC Reactor Oversight Process (ROP) provides a means to collect information about a licensee's performance, assess the information for its safety significance, and provide for the appropriate licensee and NRC response. With the ROP, NRC inspectors monitor the performance of licensees in the areas of reactor safety, radiation safety for plant workers and the public during routine operations, and security. The NRC will perform a safety review of the applicant's license renewal application to determine if the applicant has adequately demonstrated that the effects of aging on structures, systems, and components will not have adverse impacts on the operation of the nuclear plant during the 20-year period of extended operation.*

3 References

- 10 CFR 50. *Code of Federal Regulations*, Title 10, *Energy*, Part 50, “Domestic licensing of production and utilization facilities.”
- 10 CFR 51. *Code of Federal Regulations*, Title 10, *Energy*, Part 51, “Environmental protection regulations for domestic licensing and related regulatory functions.”
- 10 CFR 54. *Code of Federal Regulations*, Title 10, *Energy*, Part 54, “Requirements for renewal of operating licenses for nuclear power plants.”
- 36 CFR 800.8. *U.S. Code of Federal Regulations*, “Coordination with the National Environmental Policy Act,” Part 800.8, Title 36, “Parks, Forests, and Public Property.”
- 50 CFR 402. *U.S. Code of Federal Regulations*, “Interagency Cooperation—Endangered Species Act of 1973,” Part 402, Subchapter A, Title 50, “Wildlife and Fisheries.”
- 79 FR 36837. U.S. Nuclear Regulatory Commission, Notice of intent to prepare an environmental impact statement and conduct scoping process for license renewal application for Fermi 2; DTE Electric Company, *Federal Register*, Volume 79, No. 125, June 30, 2014, pp. 36837-36839
- [DTE] DTE Electric Company. 2014. *Applicant’s Environmental Report – Operating License Renewal Stage, Fermi 2*. Newport, MI: DTE. April 2014. 863 p. ADAMS Nos. ML14121A538, ML14121A539, and ML14121A540.
- National Environmental Policy Act of 1969, as amended (NEPA). 42 U.S.C. §4321 et seq.
- [NRC] U.S. Nuclear Regulatory Commission. 1996. *Generic Environmental Impact Statement for License Renewal of Nuclear Plants*. Washington, DC: NRC. NUREG-1437, Volumes 1 and 2. May 1996. 1,204 p. ADAMS Nos. ML040690705 and ML040690738.
- [NRC] U.S. Nuclear Regulatory Commission. 1999. Section 6.3—Transportation, Table 9.1, Summary of findings on NEPA issues for license renewal of nuclear power plants. In: *Generic Environmental Impact Statement for License Renewal of Nuclear Plant*. Washington, DC: NRC. NUREG-1437, Volume 1, Addendum 1. August 1999. 100 p. ADAMS No. ML040690720.
- [NRC] U.S. Nuclear Regulatory Commission. 2002. *Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities, Supplement 1: Regarding the Decommissioning of Nuclear Power Reactors, Appendices N, O and P, Final Report*. Washington, DC: NRC. NUREG-0586, Volume 2. November 2002. 548 p. ADAMS No. ML023500228.
- [NRC] U.S. Nuclear Regulatory Commission. 2013a. *Generic Environmental Impact Statement for License Renewal of Nuclear Plants*. Revision 1. Washington, DC: NRC. NUREG-1437, Volumes 1, 2, and 3. June 2013. 1,535 p. ADAMS Nos. ML13106A241, ML13106A242, and ML13106A244.
- [NRC] U.S. Nuclear Regulatory Commission. 2013b. *Staff Evaluation and Recommendation for Japan Lessons-Learned Tier 3 Issue on Expedited Transfer of Spent Fuel*. COMSECY-13-0030, Washington, D.C. November 2013. ADAMS Nos. ML13273A601 and ML13273A628.
- [NRC] U.S. Nuclear Regulatory Commission. 2014a. Memorandum from R.C. Bovol to M.A. Satorius dated May 23, 2014, “Staff Requirements—COMSECY-13-0030—Staff Evaluation and Recommendation for Japan Lessons-Learned Tier 3 Issue on Expedited Transfer of Spent Fuel.” Washington, DC. ADAMS No. ML14143A360.

[NRC] U.S. Nuclear Regulatory Commission. 2014b. *Notice of Intent to Conduct Scoping Meetings and Prepare an EIS for the License Renewal for Fermi 2*. Washington, DC: NRC. June 20, 2014. ADAMS No. ML14160B055.

[NRC] U.S. Nuclear Regulatory Commission. 2014c. *Public Meeting for Fermi 2 License Renewal, Afternoon Session*. Washington, DC: NRC. July 24, 2014. 111 p. ADAMS No. ML14254A465.

[NRC] U.S. Nuclear Regulatory Commission. 2014d. *Public Meeting for Fermi 2 License Renewal, Evening Session*. Washington, DC: NRC. July 24, 2014. 103 p. ADAMS No. ML14254A470.

[NRC] U.S. Nuclear Regulatory Commission. 2014e. *Public Meeting to Discuss the License Renewal Process and Environmental Scoping Process for Fermi, Unit 2*. Washington, DC: NRC. September 18, 2014. ADAMS No. ML14233A450.

4 Comment Letters and Meeting Transcripts

The following pages contain the comments, identified by commenter designation, source designation, and comment number. The comments are from letters, emails, and the transcripts of the public scoping meetings.