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- References:
- 1) Fermi 2  
NRC Docket No. 50-341  
NRC License No. NPF-43
  - 2) DTE Electric Company Letter to NRC, "Fermi 2 License Renewal Application," NRC-14-0028, dated April 24, 2014 (ML14121A554)
  - 3) NUREG-1437 Supplement 56 Volume 1, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants, Supplement 56, Regarding Fermi 2 Nuclear Power Plant, Draft Report for Comment, Chapters 1 to 8," dated October 31, 2015 (ML15300A064)
  - 4) NUREG-1437 Supplement 56 Volume 2, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants, Supplement 56, Regarding Fermi 2 Nuclear Power Plant, Draft Report for Comment, Appendices," dated October 31, 2015 (ML15300A073)

Subject: DTE Comments on the Draft Generic Environmental Impact Statement for License Renewal of Nuclear Power Plants Supplement 56 Regarding Fermi 2 Nuclear Power Plant

In Reference 2, DTE Electric Company (DTE) submitted the License Renewal Application (LRA) for Fermi 2. In References 3 and 4, NRC staff published the draft plant-specific supplement to the generic environmental impact statement (GEIS) regarding the Fermi 2 LRA. Enclosure 1 to this letter provides the DTE comments on the draft plant-specific supplement to the GEIS for Fermi 2.

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Template = ADM - 013  
E-RIDS= ADM-03

Add= E. Keegan (enk)

USNRC  
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No new commitments are being made in this submittal.

Should you have any questions or require additional information, please contact  
Lynne Goodman at 734-586-1205.

Sincerely,



Michel A. Philippon  
Director Nuclear Production (Plant Manager)  
For Vito A. Kaminskas

Enclosures: 1) Comments to Draft Generic Environmental Impact Statement for  
License Renewal of Nuclear Power Plants Supplement 56  
Regarding Fermi 2 Nuclear Power Plant

cc: NRC Document Control Desk  
NRC Project Manager  
NRC License Renewal Project Manager  
NRC License Renewal Environmental Project Manager  
NRC Resident Office  
Reactor Projects Chief, Branch 5, Region III  
Regional Administrator, Region III  
Michigan Public Service Commission,  
Regulated Energy Division (kindschl@michigan.gov)

**Enclosure 1 to  
NRC-15-0100**

**Fermi 2 NRC Docket No. 50-341  
Operating License No. NPF-43**

**Comments to Draft Generic Environmental Impact Statement for  
License Renewal of Nuclear Plants Supplement 56  
Regarding Fermi 2 Nuclear Power Plant**

DTE has reviewed the Draft Generic Environmental Impact Statement for License Renewal of Nuclear Plants Supplement 56 Regarding Fermi 2 Nuclear Power Plant (i.e. the draft SEIS). DTE's comments are provided in the table below. Two types of comments are provided: those of a technical nature and those of an editorial nature. The two types are identified in the table by the letter preceding the comment number, with "T" indicating technical and "E" indicating editorial.

Comment Number	Section	Page	Line	Comment
T1	Executive Summary 1.2	xxi 1-1	37 25	In the discussion of the purpose and need for the proposed federal action in the Executive Summary and Section 1.2, the draft SEIS states that the purpose and need is "...to provide an option that allows for power generation...". This statement differs from the DTE ER as it does not include the term "base-load" in front of "power generation". The term "base-load" is used in the NRC's Regulatory Guide (RG) 4.2 and also in GEIS (NUREG-1437) Section 1.3. The SEIS should add the term "base-load" for consistency with the DTE ER, RG 4.2, and the GEIS.
T2	2.2.2.2	2-9	25 - 26	The draft SEIS text says that the Duke Energy Station in Indiana is in the ROI. However, the earlier definition of ROI was for counties in Michigan. Therefore, the Duke Energy Station may be near the ROI but is not in the ROI.
T3	2.2.2.3	2-10	42	The draft SEIS says that nuclear power provides 31% of electricity generation in Michigan. The reference provided for this information is "EIA 2015". When DTE reviewed reference EIA 2015, the value was 28.4%, not 31%. It is possible that the value on the website may have changed during the period of review. In that case, stating "approximately 30%" would cover both values.
T4	2.2.2.3	2-11	24	The SEIS text discusses drinking water wells onsite. Both the Fermi 2 and Fermi 3 ERs state that DTE does not withdraw groundwater at the site and drinking water is obtained from a local utility. There are no drinking water wells onsite.

Comment Number	Section	Page	Line	Comment
T5	2.2.2.4	2-14	22 - 23	<p>The SEIS states that solar will remain a commercially available option for electrical generation capacity supported through the Michigan Renewable Energy Standard. As discussed on SEIS page 2-5, the Michigan Renewable Energy Standard will be met by the end of 2015. When the standard is met, it is not certain that the availability of solar will increase in the same manner as it increased prior to meeting the standard. Therefore, the NRC may want to revise the sentence so that it does not give the impression that the Michigan Renewable Energy Standard will necessarily cause further growth in renewable energy beyond 2015.</p>
T6	2	2-23	Table 2-2	<p>Table 2-2 footnote 3 is only applied to the proposed action, no-action, and new nuclear power items. It is not used for the NGCC, IGCC, and combination alternatives. Since the impacts from chronic effects of electromagnetic fields would be applicable to any plant that produces and transmits electricity, this footnote should also be used for the NGCC, IGCC, and combination alternatives.</p>
T7	3.1	3-1	10	<p>The statement "began commercial operation in July 1985" is not correct. A full power operating license was issued in July 1985. However, commercial operation did not begin until January 23, 1988 per DTE letter to the NRC (letter number NRC-88-0032) dated February 15, 1988. This DTE letter does not appear to be in ADAMS. The sentence could be reworded to discuss the operating license date of July 1985 rather than the commercial power operation date.</p>

Comment Number	Section	Page	Line	Comment
T8	3.1.3.1 3.5.1.1	3-8 3-42	Figure 3-5 Figure 3-12	<p>There are inconsistencies between Figures 3-5 and 3-12:</p> <p>1) In Figure 3-5, the water bodies are labeled North Canal, South Canal, and Small Pond (in order from top to bottom). However, as shown on Figure 3-12, the water bodies are labeled North Canal, Small Pond, and South Canal (in order from top to bottom). Figure 3-12 is correct. The water body labeled South Canal on Figure 3-5 is actually part of the North Canal; the South Canal is not actually shown in Figure 3-5. It is recommended that Figure 3-5 be revised to remove the South Canal label and that another line be drawn from the North Canal label to the water body currently labeled as the South Canal. DTE recommends this line also be added to Figure 3-12 for clarity.</p> <p>2) In addition, it is also recommended that “(Overflow Canal)” be added to the North Canal label in both Figures 3-5 and 3-12, as the Overflow Canal is used interchangeably with North Canal in the actual text.</p> <p>3) The pointer for NPDES Outfall 001 label is in a different location on Figures 3-5 and 3-12. The pointer location in Figure 3-5 is correct. The pointer location in Figure 3-12 for NPDES Outfall 001 should be moved slightly further south for consistency with Figure 3-5.</p>
T9	3.1.3.4	3-10	36 - 37	<p>The SEIS text indicates that the Fermi site potable water demand is approximately 20,000 gallons per day and gives the DTE ER as the source document. DTE did not provide a value of potable water demand in the ER, so it is not clear where the value of 20,000 gallons per day was obtained. The value also seems high. Recent analysis by DTE indicates that the average Fermi site potable water demand was less than 6,500 gallons per day.</p>

Comment Number	Section	Page	Line	Comment
T10	3.1.5	3-18	17 - 20	The sentence as written is partially incorrect since universal waste does not include items such as scrap metal, plastic bottles, etc. The sentence could possibly be reworded as "Universal wastes, such as batteries and mercury-containing lamps, and other potential wastes, such as oils, scrap metal, aluminum cans, plastic bottles, cardboard, and paper, are recycled when possible in accordance with DTE's procedures (DTE 2014d)."
T11	3.1.6.1	3-19	16	DTE recommends deleting the phrase "for RHR" from the end of the sentence since the EDGs provide standby power for more than just RHR.
T12	3.1.6.5	3-20	40	DTE recommends revising the phrase "that provide power" to " <i>and provides power</i> ". The 120 kV switchyard services the 4 CTGs and it provides power to Fermi 2 Division 1. The sentence as written in the draft SEIS does not fully reflect the plant design and so should be clarified as indicated (see ER Section 2.2.10).
T13	3.1.6.5	3-21	6	The draft SEIS says that the total length of the lines is 315 feet. However, per ER Section 2.2.10.1, the lines run 325 feet from the turbine building to the intermediate switchyard, and then run 315 feet from the intermediate switchyard to the 345 kV switchyard. Therefore the total length is $325 + 315 = 640$ feet.
T14	3.1.6.5	3-21	19 - 20	The draft SEIS states that the 345 kV lines go to a point west of I-75 and then turn north and run adjacent to I-275 for 12 mi to Brownstown Substation. The SEIS reference for this information is the Fermi 3 COLA ER. Per Section 2.2.2.1 and Figure 2.2-3 of the Fermi 3 COLA ER, the 345 kV lines run adjacent to I-75 not I-275. The discussion of I-275 in the SEIS should be revised to I-75.
T15	3.2.1.1	3-26	4	The draft SEIS says that Fermi 1 operated from 1957 through 1972. Fermi 1 construction started in 1956 (see ER Section 3.7.3.1), but only operated from 1963 to 1972.

Comment Number	Section	Page	Line	Comment
T16	3.2.1.1	3-28	7 - 8	The draft SEIS says that the area on site where the MDNR owns mineral rights is in the southeastern portion of the site "near the meteorological tower". The source of this information is the Fermi 3 ER and it is not correct to apply it Fermi 2. The discussion of the meteorological tower was based on the proposed Fermi 3 meteorological tower. The Fermi 2 meteorological tower is in a different location. As discussed in the Fermi 2 ER Section 3.1.1, the MDNR does own mineral rights in the far southeastern portion of the Fermi site and the meteorological tower is not mentioned. The sentence should be revised to remove the discussion of the meteorological tower.
T17	3.4.1	3-37	45	The draft SEIS says that the nearest quarry is about 3 miles north-northwest (NNW). In ER Table 3.12-1, the nearest quarry is 2.5 miles north-northeast (NNE). Table 7.1 of the Fermi 3 FEIS also has the direction as NNE. The direction should be revised to NNE.
T18	3.5.1.1 3.7.1.2	3-40 3-76	35 4 - 6	In several locations, the SEIS text uses the term "Central Canal" as an alternative name for a small pond which is not connected to nearby water features. However, this name is not used in the labels on Figures 3-5 and 3-12. DTE also did not use this term in the ER. Therefore, DTE recommends removing the name "Central Canal" from the text for consistency with the SEIS figures as well as the DTE ER.
T19	3.5.1.1	3-43	17, 33	Lines 17 and 33 refer to Figures 3-2 and 3-3, respectively, when discussing water features. However, Figures 3-2 and 3-3 are not as detailed as later figures, such as Figure 3-12. It may be better to refer to Figure 3-12 in both cases since Figure 3-12 provides a much more detailed view of the relevant water features.

Comment Number	Section	Page	Line	Comment
T20	3.5.1.3	3-46	41	In the Section 3.5.1.3 text, the state regulations for NPDES permit program are cited as "MAC R 323.2101-2197". The same regulations are listed as "MAC R 323.2101-2196" in the Section 3.14 list of references and Section 4.5.3.1. Therefore, there is an inconsistency in number (2197 vs. 2196). According to a review of the website associated with the references, 2197 appears to be the correct number.
	3.14	3-168	30	
	4.5.3.1	4-26	9	
T21	3.5.1.3	3-47	Table 3-8	For the discussion of Outfalls 009 and 011, the NPDES permit used the term "overflow canal". As discussed previously in the comment on Figures 3-5 and 3-12, the overflow canal is an alternate name for the north canal (the term used currently in Table 3-8). However, it may be preferable to use the term overflow canal in Table 3-8 for consistency with the NPDES permit.
T22	3.5.1.3	3-48	3, 47	Lines 3 and 47 refer to Figures 3-3 and 3-2, respectively, when discussing water features. However, Figures 3-2 and 3-3 are not as detailed as later figures, such as Figure 3-12. It may be better to refer to Figure 3-12 in both cases since Figure 3-12 provides a much more detailed view of the relevant water features.
T23	3.5.1.3	3-49	6, 15	According to the source document for reference USACE 2004, the USACE dredge permit number should be 88-001-040-8, not 98-001040-9. This incorrect permit number appears in two locations on page 3-49 and one location on page 3-176.
	3.14	3-176	24	
T24	3.5.2.3	3-54	41 - 45	The SEIS text says that tritium was detected above the laboratory detection limit in two wells with concentrations of 527 and 1170 pCi/L. This information references "DTE 2014e" which is the Fermi 2 Radiological Environmental Operating Report for 2013. Table 9 of that document (starting on page B-6) shows 5 sample results in 3 monitor wells over the laboratory detection limit, not 2 monitor wells. The values are 568 pCi/L (well EF2-07-005S), 527 pCi/L (well EF2-07-024S), and 1110, 1170, and 1450 pCi/L (well EF2-07-025S). The SEIS text should be revised for consistency with the source document. As discussed in the draft SEIS, all detected concentrations are well below EPA's drinking water standard of 20,000 pCi/L.

Comment Number	Section	Page	Line	Comment
T25	3.6.3.1	3-60	47	The draft SEIS says the prairie restoration associated with the transmission corridor was started in 2003. However, the project was started in 2005 as indicated in ER Section 3.6.6.3.
T26	3.6.3.2	3-64	Table 3-11	Table 3-11 does not include the eastern fox snake. SEIS page 3-68 describes that the eastern fox snake was observed onsite in 2008, although in a different survey than the survey that was the source of the data used for Table 3-11. Since the title of Table 3-11 indicates it covers the years 2008-2009, it seems appropriate to include the eastern fox snake. Alternatively, the text preceding Table 3-11 or the title of Table 3-11 could be revised to indicate that the table only contains animals observed during the specific survey (and therefore the eastern fox snake would not need to be included).
T27	3.6.6	3-73	Table 3-15	SEIS Table 3-15 lists two birds for May 22, 2008. The source listed for this table is a DTE RAI response. In the DTE RAI response (TE-15), there are three birds listed for the date May 22, 2008. The chestnut sided warbler in the RAI response (which is listed in a separate row under the same date) should also be included in SEIS Table 3-15 for consistency.
T28	3.7.1.2	3-75	28 - 30	The sentence regarding the use of the overflow canal by Fermi 1 implies that its usage ceased when Fermi 1 was temporarily shut down. It seems to imply that it is no longer used at all. However, the overflow canal is being used for Fermi 2 as indicated later in the discussion. Therefore, the sentence should be revised to more clearly state that its usage <u>by Fermi 1</u> ceased when Fermi 1 ceased operation. In addition, the overflow canal may have been used by Fermi 1 after the temporary shutdown but not after the permanent shutdown. DTE recommends revising the sentence such as "The overflow canal was historically used as a cooling water discharge and overflow canal for operation of Fermi 1 <i>but use for this purpose ceased when Fermi 1 was shut down.</i> "

Comment Number	Section	Page	Line	Comment
T29	3.7.1.2	3-75	32 - 33	The draft SEIS text says that the overflow canal is a permitted wastewater discharge and specifically mentions Outfall 009. As shown on Figure 3-12, Outfall 011 and three stormwater outfalls (002, 003, and 014) are also applicable to the overflow canal. These other outfalls could be mentioned within the parentheses for consistency with Figure 3-12.
T30	3.7.3	3-88	Table 3-19	SEIS Table 3-19 lists the northern riffleshell, purple lilliput, round hickorynut, and salamander mussel as "MI-T", which is defined as listed as threatened by the state of Michigan. In SEIS Table 3-22, these four species are all listed as endangered (i.e. not threatened) in Michigan which is consistent with DTE ER Table 3.6-6. DTE confirmed that the current MNFI lists these four species as endangered rather than threatened.
T31	3.7.3.1	3-94 3-97	38 - 40 28 - 32	The discussion of the commercial harvest of lake whitefish (page 3-94) and white perch (page 3-97) provide values for Michigan in 2007 and Ohio in 2009 and then reference Tables 3-20 and 3-21. However, Tables 3-20 and 3-21 provide commercial harvest for the year 2010, not 2007 or 2009. DTE recommends removing the reference to Tables 3-20 and 3-21 as the values in the text are not found in those tables. Perhaps a different cross-reference was intended.
T32	3.7.3.3	3-107	6	The discussion of the wavyrayed lampmussel includes the reference citation "Carman and Goforth 2000c". However, this reference listed in Section 3.14 addresses the channel darter and not the wavyrayed lampmussel. The reference citation on line 6 should be deleted (other references to Carman and Goforth 2000c on page 3-107 appear to be correct as they are in the channel darter discussion section).
T33	3.7.3.3	3-109	26 - 43	The SEIS text includes a discussion paragraph on the pugnose shiner. However, the pugnose shiner was not listed in Table 3-22. Clarification is needed on why it is being included in the discussion even though it is not listed in Table 3-22.

Comment Number	Section	Page	Line	Comment
T34	3.9.2	3-129	12	For consistency with the discussion in the cited reference (Kuranda et al. 2009), DTE recommends adding the word "sized" after "commercial" when discussing Fermi 1.
T35	3.10.1	3-131	6 - 7	<p>The SEIS text says there are approximately 870 employees and 20 long-term contract employees, with the source reference being the DTE ER. The DTE ER states that there are 889 full time employees (ER pages 2-50 and 2-56). The ER does not explicitly distinguish between employees and long-term contract employees. So although the total number of employees (~890) is consistent between the SEIS and the ER, it is not clear where the NRC got the information that there are 20 long-term contract employees. This distinction is also made elsewhere in the SEIS such as in Sections 4.10 and 4.12.2 which repeatedly uses the ~870 value rather than ~890. The ~890 value in the ER does include some employees from far outside the region of interest (e.g. ER Table 2.5-1 lists employees from Georgia and New York), but it is not clear if the NRC used distance as a criteria for determining the ~870 value used in the evaluations for the number of employees.</p> <p>Note that if the text here was revised to use the ~890 value, then corresponding changes to Sections 4.10 and 4.12.2 (and potentially others) would also be required.</p>

Comment Number	Section	Page	Line	Comment
T36	3.10.1	3-131	9 - 11	<p>The SEIS text says that the remaining 22% of the workforce comes from 16 other counties in Michigan and Ohio and 1 Canadian province, with numbers ranging from 1 to 9 employees per county. The source reference for this statement is the DTE ER. However, ER Table 2.5-1 lists 18 counties in Michigan and Ohio (besides Monroe and Wayne), 1 Canadian province, as well as 2 counties in Georgia, and 1 in New York. In addition, ER Table 2.5-1 as well as SEIS Table 3-25 shows that there are more than a maximum of 9 employees per county (excluding Monroe and Wayne). Lucas county has 74 employees which is included as part of the 22%. It appears that the SEIS text is not consistent with the SEIS table and the DTE ER.</p>
T37	3.10.1	3-131	Table 3-25	<p>SEIS Table 3-25 shows a total of 867 employees. However, the actual sum of the numbers in the rows of the table is 889. The 889 value would be consistent with the value in ER Table 2.5-1, but the 867 value would not be. This comment is related to the above comment regarding the correct value to use for the number of employees.</p> <p>Also, the format of the table lists "Other counties" in such a way that it appears to be other counties of just Ohio. The numbers in this row clearly reflect other counties for both Ohio and Michigan. The formatting should be altered to make it clear that "Other counties" is not a subset of Ohio.</p>
T38	3.10.2.1	3-132	15 - 16	<p>The SEIS text indicates that retail trade is the third largest employment sector with 10.5%. However, based on Table 3-26, the "professional, scientific, management, administrative, and waste management services" sector appears to be slightly larger than "retail trade" (i.e. 10.9% vs. 10.5%). Therefore, the text is not consistent with the table.</p>

Comment Number	Section	Page	Line	Comment
T39	3.10.5	3-142	Table 3-38	The Winter PRE entry for Airport Schools in SEIS Table 3-38 has a value of 18.5446. The source document (the DTE RAI response) had a value of 18.5445. There appears to be an inconsistency in the last digit of the value in SEIS Table 3-38.
T40	3.11.1	3-146	14	The SEIS text says that the 3-year average annual collective dose per reactor is 131.18 person-rem. The source document (NUREG-0713) uses a rounded value of 133 person-rem on page 4-14 and a more detailed value of 133.185 on page 4-15. The value in the SEIS text appears to be inconsistent with the source document.
T41	3.11.2	3-146	33 - 36	The sentence that discusses DTE chemical control procedures refers to reference DTE 2014g, which is the DTE RAI response. The information in the DTE RAI WMNR-5 response is slightly different than how it is presented in the SEIS. The SEIS sentences seems to imply that personnel are required to check the existing stock system to see if a chemical is already available before requesting <u>that</u> chemical. In the DTE RAI WMNR-5 response, DTE stated that personnel are required to check if a <u>similar</u> chemical is already available before requesting a <u>new</u> chemical. The difference is very slight, but the intent of the DTE wording was to demonstrate that the procedure requirement is to avoid having multiple products that perform the same function in addition to just minimizing overall stock. It may be beneficial to reword the sentence in the SEIS for consistency with the RAI response. However, the overall conclusion in the SEIS section that DTE has processes and procedures to minimize potential for hazardous chemical waste is correct and consistent with the DTE ER and RAI response.

Comment Number	Section	Page	Line	Comment
T42	3.11.3	3-147	26	The SEIS text discusses "Mid-Atlantic states". Michigan is an "East North Central" state according to the US census divisions, which are the groupings used in the reference document "CDC 2011". According to the source document, the statement about the highest number of cases being during summer and early fall is true for both Mid-Atlantic and East North Central. Therefore, it seems more appropriate to refer to East North Central states for the discussion of Fermi 2. Another alternative would be to use the term "Midwest", which is also used in the source document and would be appropriate for Michigan.
T43	3.12.1 3.12.2	3-151 3-153	34 - 40 15 - 21	There appears to be a difference in methodology between the draft SEIS and the DTE ER in the Environmental Justice section. In the DTE ER Section 3.10.2, a population is considered minority or low-income if the population in the block group exceeds 50% or if it is more than 20 percentage points greater than the percentage in the geographic area (50 mile radius). The methodology in the DTE ER was based on the NRC guidance LIC-203 Revision 3. However, in the draft SEIS Sections 3.12.1 and 3.12.2, a population is considered minority or low-income if the population in the block group exceeds the percentage in the geographic area (50 mile radius). As a result, the draft SEIS describes and shows much larger values for minority and low-income populations than the DTE ER. However, DTE agrees that the draft SEIS results are conservative.
T44	4.3.2.1	4-7	10	The SEIS text says that the impact of the no-action alternative on air quality would be SMALL. However, SEIS Table 2-2 says that the impact would be SMALL to MODERATE. This appears to be an inconsistency between the text and the table.

Comment Number	Section	Page	Line	Comment
T45	4.3.3.1	4-8	15	The SEIS value for sulfur oxide emissions is given as 4 tons (13 metric tons) per year. One of these values must be incorrect since 1 ton is equal to approximately 0.9 metric tons. Based on scaled values given on page 4-18, it appears that 13 metric tons is probably the correct value and 4 tons is incorrect. Using the correct unit conversion, the value would then be approximately 15 tons instead of 4 tons.
T46	4.3.5.2	4-16	45	The SEIS text discusses the maximum hourly $L_{eq}$ resulting from operation of Fermi 3. However, this discussion is in the section on construction not operation, consistent with its use in the source document (Fermi 3 FEIS). So it appears that "operation" should be "construction" in this line.
T47	4.3.6.1	4-17 4-18	30 - 31 40	The energy rating for the NGCC component of the combination alternative on page 4-17 (400 MW) and page 4-18 (total gross capacity 400 MW) seems to be inconsistent with the rating of 470 MWe or net capacity of 400 MWe given in Section 2.2.2.4 on page 2-12 (lines 7 and 16). DTE recommends that the sentences on pages 4-17 and 4-18 be clarified to indicate the appropriate rating for consistency with Section 2.2.2.4.
T48	4.3.6.1	4-19	3 - 4	The current wording of the sentence seems to imply that the emission of nitrogen oxides (90 MT) exceeds the threshold for GHG reporting (25,000 MT) which it does not. DTE recommends revising the sentence so that it states that "Annual emissions of nitrogen oxides would exceed the major source threshold and <i>emissions of CO<sub>2eq</sub> would exceed</i> the threshold for mandatory GHG reporting (25,000 MT (27,558 tons) CO <sub>2eq</sub> per year)."

Comment Number	Section	Page	Line	Comment
T49	4.6.1.1	4-31	15 - 16	The SEIS states that the “The majority of site landscape maintenance is performed within the protected area and not within natural areas on the site.” The use of the phrase “protected area” in this context is confusing since the term has a specific meaning with regards to plant security. Some of the landscape requiring maintenance is outside of the “protected area”. DTE recommends replacing “protected area” with “developed area”.
T50	4.6.2	4-32	42 - 44	The discussion in the SEIS regarding the impact of Fermi 2 decommissioning on the DRIWR or other sensitive habitats references the DTE RAI responses. In those RAI responses, such as the response to LUVR-3, DTE discusses the decommissioning of Fermi 1 and the potential construction of Fermi 3, but does not discuss decommissioning of Fermi 2. Since the statement in the SEIS is not supported by the listed reference, the sentence should be revised or deleted.
T51	4.7.6	4-39	17	The statement that the wind and solar portions of the alternative account for 90% of the alternative’s power generation is inconsistent with SEIS Table 2-1 which indicates that they are about 75% (i.e. 800 MWe of 1200 MWe).
T52	4.8.1.1 4.18	4-41 4-136	35 45	The SEIS text refers to reference “DTE 2015a” for discussion regarding the red knot. In Section 4.18, the reference “DTE 2015a” description is for DTE’S RAI response on SAMA. Therefore, this does not appear to be the correct reference. In addition, the ML number provided for reference DTE 2015a in Section 4.18 (page 4-136) brings up an exhibition document rather than a DTE RAI response. So there appears to be an inconsistency between the SEIS text, the reference number, and the ML number.

Comment Number	Section	Page	Line	Comment
T53	4.9.1 2	4-53 2-22	30 - 31 Table 2-2	Item 4 of the sentence indicates DTE's assurance that no license renewal-related physical changes or ground-disturbing activities would occur. This is slightly different than similar statements in the ER, such as in Section 4.7.1.4.2 which discusses that no license-renewal related construction activities have been identified, any maintenance activities would be limited to currently developed areas of the site, and that no future ground-disturbing activities are planned in support of license renewal. A possible alternative would be to revise Item 4 to "...no license renewal-related physical changes or ground-disturbing activities would occur <i>outside developed areas</i> ." Note that footnote 2 of Table 2-2 uses the same Item 4 wording and so would also need to be revised for consistency.
T54	4.9.3	4-54	29	The SEIS text in Section 4.9.3 says that the impact on historic and cultural resources due to construction and operation of an NGCC plant would be SMALL. However, SEIS Table 2-2 says that the impact would be SMALL to MODERATE. This appears to be an inconsistency between the text and the table.
T55	4.10.4.2	4-60	17 - 18	It is not clear why fewer workers than the 210 estimated to commute daily to an IGCC plant would be required if multiple units are operated at the same site. More units would mean fewer workers per unit, but would not reduce the total number of workers.
T56	4.10.5.1	4-60	42	The SEIS text mentions construction near an existing nuclear plant or retired coal site. It is not clear why this section on the new nuclear alternative would include discussion of a retired coal site.
T57	4.10.6.2	4-62	41	The SEIS text in Section 4.10.6.2 says that the impact on socioeconomics (transportation) due to construction and operation of wind and solar would be SMALL to MODERATE. However, SEIS Table 2-2 says that the impact would be SMALL. This appears to be an inconsistency between the text and table.

Comment Number	Section	Page	Line	Comment
T58	4.11.1.2	4-70	Table 4-14	In Table 4-14, the assumption listed under SAMA 206 does not appear to be correct. From comparison with the DTE ER, it appears that the assumption listed in the SEIS corresponds with the assumption for SAMA 211 in the ER. The SAMA 206 assumption should be revised to correspond with the assumption for SAMA 206 in the ER.
T59	4.11.1.2	4-71	Table 4-14	Table 4-14 footnote c describes SAMAs not listed in the table that were updated by DTE as described in Section F.4 of the SEIS. DTE believes that SAMA 154 should also be listed in footnote c as it is included in Section F.4 as having its assessment updated by DTE.
T60	4.11.1.2	4-71	Table 4-14	Table 4-14 footnote d describes SAMAs not listed in the table with calculated corrected benefits as listed in Table F-6. DTE believes that SAMA 54 should also be listed in footnote d as it is included in Table F-6.
T61	4.11.1.2	4-72	32 - 33	DTE recommends revising the phrase "the design evaluation process and evaluated considering other planned plant modifications" to "the <i>evaluation</i> process and evaluated considering other planned <i>changes</i> ". The reason is that some of the potentially cost-beneficial SAMAs involve procedures and/or training and do not include design changes or modifications. Since it appears that the statement in the SEIS was meant to be a general statement applicable to all of the potentially cost-beneficial SAMAs, the terms "design" and "plant modifications" are not appropriate in general. The same revision would apply to all 5 of the locations noted for this comment.
	4.11.1.2	4-73	16 - 17, 45 - 46	
	App. F.6.1	F-50	13 - 14	
	App. F.7	F-56	19 - 20	
T62	4.12.1	4-76	24	The SEIS text refers to Figures 3.12-1 and 3.12-2. The location of these figures is not clear as there are no figures by those numbers in the SEIS, ER, or GEIS. If the figures are intended to be those in the SEIS, the correct numbers appear to be Figures 3-18 and 3-19.

Comment Number	Section	Page	Line	Comment
T63	4.12.1	4-77	33 - 34	The SEIS text states that samples are collected annually. In some cases, samples may be collected more frequently than annually. Therefore, DTE recommends revising the statement to indicate that samples are collected <i>at least</i> annually.
T64	4.12.1	4-78	3 - 4, 10 - 11, 16 - 17	In several locations on page 4-78, the SEIS text states that no radioactivity was detected greater than the minimum detectable activity. In each case, DTE recommends clarifying that no <i>plant-related</i> radioactivity was detected greater than the minimum detectable activity. In some cases, offsite samples did indicate radioactivity greater than minimum detectable activity due to causes other than Fermi 2, such as naturally occurring radiation or fallout from weapons tests (as described at the top of page 4-78). This clarification would be consistent with the language used by DTE in the reference cited in the SEIS (DTE 2014b).
T65	4.15.2.1	4-91	Table 4-19	Table 4-17 should list "Termination of plant operations and decommissioning" as the only issue, since it is the issue listed in Table B-1 of Appendix B to Subpart A of 10 CFR Part 51 related to decommissioning. The issues currently listed in Table 4-19 are not listed in Table B-1. The sentence before Table 4-19 reads "Table 4-19 lists the Category 1 issues in Table B-1 of Appendix B to Subpart A of 10 CFR Part 51 that are applicable to Fermi 2 decommissioning following the license renewal term." For the other categories of NEPA issues in the draft SEIS, the issues listed match those in Table B-1.
T66	4.15.3.1	4-93	15	This page indicates that 25,000 MT is equal to 25,558 tons. However, 25,000 MT is actually equal to 27,558 tons as indicated on page 4-19 line 4.

Comment Number	Section	Page	Line	Comment
T67	4.15.3.1	4-93	Table 4-20	The SEIS Table 4-20 entry for 2010 has 9163 CO <sub>2eq</sub> MT/year with the source document being the DTE RAI response. This value appears to be inconsistent with the DTE RAI response. When adding the values in the DTE RAI MET-3 response, the correct total appears to be 9193 CO <sub>2eq</sub> MT/year.
T68	4.15.3.1	4-94	14 - 15	<p>The SEIS text gives an emissions estimate of 937 kg of CO<sub>2eq</sub> per kilowatt-hour with a value in parentheses of 937 g C<sub>eq</sub>/kWh. There appears to be a discrepancy between the units of the two values (i.e. one is in kilograms and the other is in grams).</p> <p>In addition, the reference given for the values is NETL 2010. According to Section 4.18, NETL 2010 is a study on NGCC rather than IGCC. Since this text is in the IGCC section, the reference may be incorrect.</p>
T69	4.15.3.2	4-96	42	The SEIS discusses an increase in annual mean temperature of 2.5 to 3.5 °F (4.5 to 6.3 °C). Either the units or values are incorrect here because the values do not correspond to each other when converting between F and C.
T70	4.16.3.1	4-108	40 - 43	On lines 41 and 42, DTE recommends revising "Over the past 5 years" to "During a five-year period from 2009 to 2013" since the past 5 years could be interpreted to mean 2010-2014 due to the date of this SEIS, whereas the data was for the specific 5 year period from 2009 to 2013.
T71	4.16.5	4-119	32 - 49	The discussion of mayflies leaves the impression that mayflies have been reduced almost to extirpation since the 1960s. However, some mayfly recovery occurred subsequent to the 1960s and there are currently considerable densities of mayflies in this region. It may be beneficial to note that somewhere in the discussion.

Comment Number	Section	Page	Line	Comment
T72	4.16.12	4-131	Table 4-24	The SEIS Table 4-24 entry for "socioeconomics" says "no new or increased impact", which corresponds with the first sentence of Section 4.16.7.1 (the conclusion section for the cumulative effects on socioeconomics). However, the "socioeconomics" entry for cumulative impacts in Table ES-1 says "SMALL to LARGE", which corresponds to the second sentence of Section 4.16.7.1. The result is that the entries in Tables 4-24 and ES-1 appear to be inconsistent with each other. DTE recommends adding some of the information from the second sentence of Section 4.16.7.1 to Table 4-24 so that it is more obvious that Tables 4-24 and ES-1 are in agreement.
T73	App. A	A-4	Table A-1	No affiliation is given for "Richard Micka". However, the comment letter (G) provided by Mr. Micka indicates that he is the Chairman of the DRIWR Alliance. This affiliation could be included in Table A-1.
T74	App. A App. F.2.2.4	A-29 F-19	42 - 43 37 - 38	The SEIS text in Appendix A and Appendix F says that sensitivity values for evacuation fraction have a very small influence on population dose risk (< 0.005 percent). It appears that this number is calculated based on ER Table D.1-26. If so, the calculated number should be < 0.5 percent rather than < 0.005 percent. The same change should be made in Appendix A and Appendix F.

Comment Number	Section	Page	Line	Comment
T75	App. A	A-43	7 - 8	The SEIS text says that wildlife surveys do not indicate the presence of beavers on or in the vicinity of the Fermi site. This statement is correct since the wildlife surveys and the DTE ER do not discuss beavers. However, site personnel have recently noticed possible evidence of a beaver (i.e. some small chewed trees and debris collected in water on site) although an actual beaver has not been observed. The debris that looked like a potential beaver dam was located in the small pond shown on Figure 3-12 of the SEIS. As discussed in SEIS Section 3.5.1.1, this small pond is not directly connected to any other surface water features. Therefore, DTE recommends that the discussion be modified to indicate that even if beavers were present on site, the evaluation of the draft SEIS in Sections 3.6 and 4.6 would still be accurate and impacts would be SMALL.
T76	App. B	B-4	Table B-1	In Table B-1, in the last row on page B-4, revise "These parts of the MCL implement the requirements of the CAA" to "These parts of the MCL implement the requirements of the <i>CWA</i> ".
T77	App. B	B-6	Table B-2	In the first row of Table B-2, the expiration date of NRC license NPF-43 should be "3/20/2025".
T78	App. D	D-3	Table D-1	There are two correspondence letters that could be added to this table: 1) DTE sent a letter to the NRC on February 18, 2015 that was a revised response to an environmental RAI. The ML number for the correspondence is ML15050A682. 2) The NRC sent a letter to DTE on February 24, 2015 that was a change in license renewal schedule and project manager. The ML number for the correspondence is ML15051A348.
T79	App. F.2.2	F-5	24	The text on line 24 states a reduction in CDF to 1.5E-06 per year while the footnote 1 at the bottom of the page states 1.3E-06 per year. DTE believes that the text on line 24 should state 1.3E-06 per year for consistency with the footnote.

Comment Number	Section	Page	Line	Comment
T80	App. F.2.2	F-5	Table F-3	The Table F-3 LERF value for IPE (1992) says "Not Available". The value is provided in ER Table D.1-17 as 8.0E-07.
T81	App. F.2.2.2	F-13	26	The SEIS text indicates that the external events multiplier is 14.6. In the DTE RAI 3.b response (NRC-15-0013), the multiplier was calculated to be 14.7.
T82	App. F.2.2.3	F-14	11 - 12	The SEIS text says that there were 5 accident classes and 19 subclasses as listed in ER Table D.1-8. However, according to the ER Section D.1.2.2.4 and Table D.1-8, there are 5 classes and 16 subclasses.
T83	App. F.2.2.3	F-14	32 - 33	The draft SEIS states that DTE indicated in an RAI response that all containment isolation failure sequences were assumed to result in a high early (H/E) release. However, the DTE response to RAI 2.c (NRC-15-0013) on containment isolation failure sequences stated that "Failure of containment isolation in conjunction with core damage is assumed to result in a High-Early (LERF) release." The SEIS should add the phrase "in conjunction with core damage".
T84	App. F.2.2.3	F-16	30 - 31	The draft SEIS describes that DTE indicated the run times for two of the release categories was 40 hours (or approximately 36 hours after accident initiation). However, the DTE RAI 2.h response (NRC-15-0013) indicates the time was 40 hours from accident initiation or approximately 36 hours following core damage.
T85	App. F.2.2.3	F-16	35 - 37	The draft SEIS states that DTE reported an increase of 0.01 percent of the core inventory. However, the DTE RAI 2.h response (NRC-15-0013) indicates an increase in 0.01 (not 0.01 percent) of the core inventory or about 3 to 4 percent of the 40 hour release fractions for CsI and CsOH from the 40 hour values used in the SAMA analysis were obtained by using a run time of 48 hours.

Comment Number	Section	Page	Line	Comment
T86	App. F.2.2.4	F-20, F-21	49, 1	DTE recommends revising "...Fermi 3, whose operation has not yet begun but is planned during the license renewal period for Fermi 2..." to "...Fermi 3, <i>which has been licensed for the site, and whose operation may occur</i> during the license renewal period for Fermi 2..."
T87	App. F.3.2	F-25	6	Revise the phrase "including external events uncertainty" to "including external events <i>and</i> uncertainty" similar to how it is on line 10 on this same page.
T88	App. F.4	F-28	36	Delete the reference to "DTE 2015c" since that RAI response did not address the SAMA being discussed.
T89	App. F.4	F-29	19 - 21	The sentence in the draft SEIS states that DTE indicated that drywell head leakage is the dominant containment failure mode. For consistency with the DTE RAI 6.h response, DTE recommends revising "the dominant" to " <i>a</i> dominant".
T90	App. F.4	F-41	Table F-5	In Table F-5, the Population Dose and OECR columns for SAMA 203 both have <0.1. However, comparison to the same entries in Table D.2-1 in the DTE ER show that the values should both be <1.
T91	App. F.4	F-42	Table F-5	In Table F-5, for SAMAs 206 and 207, the description of the SAMA was left out of the assumption section. The assumption section starts with how the analysis of the change was performed. For the other SAMAs, the description of the change in Section D.2.3 of the ER was included before the description of how the change was analyzed.

Comment Number	Section	Page	Line	Comment
T92	App. F.6.1	F-47	31 - 37	This paragraph does not accurately describe DTE's method of determining avoided costs (i.e. benefit) for each SAMA. While PDR% and OECR% are presented for information in Table D.2-1 of the DTE ER, their values are the result of the SAMA analysis and are not directly used in the calculation of SAMA benefits (note that OECR% is not presented in the ER). DTE actually recalculated the MMACR for each SAMA using the MMACR formula on line 23 of page F-47. The PRA was modified to represent implementation of each SAMA and then quantified to determine the new core damage frequency (CDF) and each release category frequency. These results were then used to calculate $W_{PHA}$ , $W_{EA}$ , $W_O$ , $W_{CD}$ , and $W_{RP}$ for each SAMA. The parameters are then summed and multiplied by EEM to obtain the SAMA's MMACR. A specific SAMA's benefit is then determined by subtracting the SAMA MMACR from the Baseline MMACR (SAMA Benefit = $MMACR_{Baseline} - MMACR_{SAMA}$ ). The percentage reductions for PDR and OECR presented in Table D.2-1 of the ER are calculated based on the results of the SAMA analysis which was determined for each SAMA as described above, using the formula on line 23 of page F-47 of the draft SEIS. Note that the method described in the paragraph would provide equivalent results as the method DTE used.
T93	App. F.6.1	F-48	5	The draft SEIS refers to DTE performing a 3 percent discount rate sensitivity case per NUREG/BR-0058. The DTE ER, Section D.1.5.4 refers to NUREG/BR-0184 as being the source of the formulas and refers to it for the 3% sensitivity case.
T94	App. F.6.2	F-52	17 - 20	The SEIS states that the $3.14 \times 10^{-9}$ per year unaccounted for release fraction is ~2% of the total CDF. DTE believes the values should be ~0.2% (i.e. $3.14 \times 10^{-9}$ divided by $1.5 \times 10^{-6}$ ).

Comment Number	Section	Page	Line	Comment
T95	App. F.6.2	F-53	Table F-6	<p>For SAMA 24, column 3, the footnote "8" is used. However, there is no footnote 8 to the table. Based on context, it appears the correct footnote should be "h".</p> <p>For SAMA 67, columns 3 and 4, the footnote "12" is used. However, there is no footnote 12 to the table. Based on context, it appears the correct footnote should be "h".</p>
T96	App. F.6.2	F-54	Table F-6	<p>Footnote e is incorrect. The values displayed without parentheses represent the summation of the Adjusted Benefit Portion from Offsite and Base Case Benefit Portion from Onsite in Table 2-2 of an RAI response (DTE 2015c). The original DTE ER base case total benefit in Table 3-3 was NOT added since the portion due to offsite is already included in the Adjusted Benefit Portion from Offsite and the base case portion from onsite is already being added. Also, Table 2-2 of DTE 2015c already included the previous RAI response's impact on SAMA 78.</p>
T97	App. F.6.2	F-55	Table F-6	<p>Footnote L refers to column 11 in parentheses. There is no column 11 in the table. Based on context, it appears that it should be column 7.</p>

Comment Number	Section	Page	Line	Comment
E1	Executive Summary	xxiv	15	The phrase "Fermi 2 licenses expire" should be "Fermi 2 <i>license expires</i> ".
E2	Abbrev. and Acronyms	xxviii	6	The acronym for "Cross-State Air Pollution Rule" should be CSAPR.
E3	Abbrev. and Acronyms	xxix	35	The acronym for "independent spent fuel storage installation" should be ISFSI.
E4	Abbrev. and Acronyms	xxxiii	6	The definition of the acronym PSDAR should include "report" at the end.
E5	Abbrev. and Acronyms	xxxiii	15 - 16	The acronym and definition for RHR should begin on a new line.
E6	Abbrev. and Acronyms	xxxiii	31	The definition of the acronym SESC is missing a closing parenthesis after Michigan.
E7	Abbrev. and Acronyms	xxxiv	13	The acronym for U.S. Global Change Research Program should be USGCRP.  Also, the period is missing after the "S" in "U.S."
E8	1.3	1-2	15	The draft SEIS says that the NRC staff will host "public meetings". Since only one public meeting is scheduled, it should say " <i>a public meeting</i> ".
E9	1.11 1.12	1-8 1-9	13 N/A	A reference is provided in the text as "NRC 2014f". There is no reference "NRC 2014f" included in the list of references in Section 1.12. There is a reference "NRC 2014f" in Section 4.18 that could potentially be the correct reference based on the topic being discussed in the text. However, it would be helpful to include reference "NRC 2014f" in the list of references in Section 1.12.

Comment Number	Section	Page	Line	Comment
E10	2.2.2.3	2-11	15	A reference is provided in the text as "NRC 2013a". In Section 2.5, reference NRC 2013a is the GEIS (NUREG-1437). The topic being discussed in the text is the Fermi 3 COL FEIS (NUREG-2105). Therefore, it appears that the correct reference should be to "NRC 2013c".
	2.5	2-29	5	
E11	2.3.8	2-19	6	A reference is provided in the text to "DTE 2014". The reference should be "DTE 2014b" for consistency with how the reference is listed in Section 2.5.
	2.5	2-25	31	
E12	2	2-23	Table 2-2	For the Human Health entry under Fermi 2 License Renewal (Proposed Action) in Table 2-2, the word "SMALL" is spelled incorrectly.
E13	3.1.1	3-4	Figure 3-3	Figure 3-3 has a label for the "Spoils Disposal Pond". Neither the DTE ER nor the SEIS use this term. The term "Dredge Basin" is used instead. For consistency, the term "Dredge Basin" is recommended.
E14	3.1.3.2	3-9	34 - 38	The wording of the sentence starting with "Decanting pumps..." gives the impression that the shoreline discharge structure is the NPDES permit. The structure itself is not the permit, but rather is the primary discharge point authorized by the permit. DTE suggests a possible rewording of the sentence to say "...shoreline discharge structure, which <i>under</i> Fermi 2's primary National Pollutant Discharge Elimination System (NPDES) permit (No. MI0037028) (MDNR 2010) <i>allows</i> the plant...".
E15	3.1.3.2	3-9	37	Multiple locations of text discussion of the NPDES permit MI0037028 gives reference "MDNR 2010" as the source. There is no "MDNR 2010" listed in the references in Section 3.14. The reference should be "MDNR 2012" for each of the three instances listed (pages 3-9, 3-146, 3-147).  In addition, the permit number listed in reference MDNR 2012 in Section 3.14 should be "MI..." rather than "MI...".
	3.5.1.3	3-146	43	
	3.5.1.3	3-147	Table 3-8	
	3.14	3-170	9-12	

Comment Number	Section	Page	Line	Comment
E16	3.1.4.3	3-15	19	The text defines LLW as the acronym for low-level radioactive waste. This acronym should be included in the list of acronyms.
E17	3.1.5	3-18	9	The word "of" should be deleted from the phrase "following list summarizes of the types".
E18	3.3.2	3-34	8	The discussion of Washtenaw County refers to the "1997 and 200 standard". Per the other usage in this section and the list of references, the "200 standard" should be "2006 standard".
E19	3.3.3	3-37	1	The reference to "HUD 2014" is missing a closing parenthesis at the end.
E20	3.5.1.1	3-44	4	The phrase "dredge spoil" should be "dredge spoils".
E21	3.5.1.2	3-44	23	There appears to be a parenthesis missing on this line. The 72.2 million cubic meters per year has an opening parenthesis, but not a closing one.
E22	3.5.2.1	3-51	Figure 3-13	The Figure 3-13 legend entry for the star says "Fermi 3". It should be "Fermi 2".
E23	3.6.5.1	3-68	4 - 5	The reference "DeCO 2000" appears twice in the list; the second instance can be deleted.
E24	3.6.5.2	3-69	34	The draft SEIS text refers to "Section 4.15.4". However, the SEIS does not have a Section 4.15.4. It appears the correct reference should be to "Section 4.16.4".
E25	3.7	3-74	21	DTE recommends replacing "cooling lake" with "cooling water" or "blowdown". The CWR is not typically referred to as a lake.
E26	3.7.1.8	3-78	42	DTE recommends adding "program" after "NPDES" for completeness.
E27	3.7.3.1	3-93	42	The scientific name of the goldfish (given as carrasius auratus) appears to be spelled incorrectly. The correct name appears to be "carassius auratus" as shown on page 3-89 in Table 3-19.

Comment Number	Section	Page	Line	Comment
E28	3.7.3.3	3-103	13 - 15	The SEIS text says that of the 15 aquatic species, 8 are fish and 8 are mollusks. These numbers do not add up. Since there are only 7 mollusk species listed in Table 3-22 and discussed on subsequent pages, the text should be revised to state that of the 15 aquatic species, 8 are fish and 7 are mollusks.
E29	3.7.3.4 3.14	3-113 3-157	21 44	On page 3-113, the reference citation "AECOM 2009a" should be changed to "AECOM 2009" for consistency with how this reference is listed in Section 3.14.
E30	3.9.2 3.14	3-129 3-173	9 - 10 21 - 25	The SEIS text on page 3-129 indicates "NPS 2015c" is the source reference for the discussion of the River Raisin Battlefield Site and "NPS 2015d" is the source reference for the discussion of National Historic Landmarks in Monroe County. However, the references in Section 3.14 are in the opposite order (i.e. NPS 2015c is the reference for the National Historic Landmarks and NPS 2015d is the reference for the River Raisin Battlefield Site). The text should be corrected to match the order in the references section.
E31	3.10.2	3-133	5	The reference provided for the Michigan median household income is "USCB 2013a". There is no reference "USCB 2013a" in the list of references in Section 3.14. It appears that the correct reference should be "USCB 2014a".
E32	3.10.3	3-134	2	There is a closing parenthesis ")" missing after "(32 km)". The parenthesis is needed in order to close the parenthesis that started with "(greater than..." on the same line.
E33	3.12.2	3-153	3	The plant name "FERMI 2" should not be in all capital letters for consistency with the rest of the SEIS.
E34	3.14	3-159	27	The ADAMS ML number listed for reference Carman 2001f (ML112640087) appears to be incorrect. The correct number appears to be ML112640089.

Comment Number	Section	Page	Line	Comment
E35	4.1	4-1	11	The SEIS text wording appears to be missing a word (or words) compared to similar statements in the SEIS. This line says "...are great that...". Elsewhere such as in the abstract (page iii) or Section 5.3 (page 5-1) it says "...are <i>not so</i> great that...".
E36	4.2.1.1	4-2	16	The reference citation on page 4-2 should be changed from "2002" to "2002b" for consistency with how it is designated in the Section 4.18 list of references.
	4.18	4-144	29	
E37	4.3.3.1	4-7	26	The references to "Section 2.3.1" on pages 4-7 and 4-10 should be changed to "Section 2.2.2.1" since the section currently referenced is about alternatives dismissed rather than viable alternatives.
	4.3.3.2	4-10	8	
E38	4.3.3.1	4-8	Footnote 14	CO <sub>2eq</sub> should be CO <sub>2eq</sub> (i.e. subscript) for consistency with the rest of the text.
E39	4.3.4.1	4-12	28	The phrase "about 269 mi of the Fermi site" should be "about 269 mi <i>from</i> the Fermi site".
E40	4.3.5.1	4-15	24	The phrase "the estimates account of" should be "the estimates account <i>for</i> ".
E41	4.3.5.1	4-16	14	There appears to be an extraneous parenthesis after 25,000 MT.
E42	4.3.5.2	4-17	2	The phrase "of a new a nuclear" seems to contain an extra word. Perhaps the second "a" should be deleted.
E43	4.3.6.2	4-19	26	The reference to "Section 2.3.4" should be changed to "Section 2.2.2.4" since the section currently referenced is about alternatives dismissed rather than viable alternatives.
E44	4.3.6.2	4-19	34	The phrase "the noise environmental will" appears to be grammatically incorrect. Perhaps the word "environmental" should be "environment".
E45	4.3.6.2	4-20	13	The reference to "Section 4.3.3.1" should be changed to "Section 4.3.3.2" since Section 4.3.3.1 is the air quality section while Section 4.3.3.2 is on noise and noise is the topic being discussed here.

Comment Number	Section	Page	Line	Comment
E46	4.5.1.2	4-24	4	The phrase "As described Section" should be "As described <i>in</i> Section".
E47	4.5.3.1	4-25	47	There appears to be an extraneous parenthesis after SEIS.
E48	4.5.6.1	4-29	1	The phrase "about 33 percent less than those under the NGCC alternative" should be changed to "about 33 percent <i>of</i> those under the NGCC alternative". An NGCC plant 1/3 the size will use 1/3 the amount of water, not 1/3 less water. The values for water use in the rest of the paragraph support that the use is 33% of the NGCC alternative.
E49	4.6.4	4-34	24	The SEIS text cross-reference for the climate change discussion is to Section 4.13.3.2. There is no SEIS Section 4.13.3.2. The climate change discussion is actually found in Section 4.15.3.2.
E50	4.6.6	4-35	N/A	SEIS page 4-35 was out of order in the PDF in ADAMS. It was placed between pages 4-39 and 4-40. It should be moved to between pages 4-34 and 4-36.
E51	4.7.3	4-37	38	The conclusion mentions "IGCC" plant. It should be "NGCC" plant in this section.
E52	4.7.5	4-39	1	The SEIS text references Table 4-8, which is the table for Special Status Species and Habitat Issues. Since this discussion is regarding aquatic resources, the reference should be to Table 4-7, which is the table for Aquatic Resource Issues.
E53	4.8.1.1	4-40	Table 4-9	SEIS Table 4-9 lists two bird species under the heading "mammal". This is different from SEIS Table 3-23 where birds and mammals are listed under separate headings.
E54	4.8.1.1	4-45	20	The scientific name for the Indiana bat given here ( <i>Sodalis myotis</i> ) is not consistent with the usage in Table 4-9 ( <i>Myotis sodalis</i> ).

Comment Number	Section	Page	Line	Comment
E55	4.9.2	4-53	35	Multiple places in the SEIS text refer to the Fermi 2 “operating licenses” plural. It should be singular in each case.
	4.12.2	4-78	45	
	4.13.2	4-82	30	
E56	4.11.1.2	4-69	12	A comma is needed after “only”.
E57	4.13.1	4-82	Table 4-17	The SEIS Table 4-17 entry for nonradioactive waste storage refers to GEIS Section 4.11.1.4. This section number appears to be incorrect. The correct GEIS section number appears to be 4.11.1.5.
E58	4.14	4-86	6	The phrase “the most the most” should be “the most”.
E59	4.14	4-86	21	The phrase “washing up of beaches” should be “washing up <i>on</i> beaches”.
E60	4.15.2.2	4-91	31	The SEIS refers to Section 14 of the GEIS. It does not appear that this is the correct section number. The correct section number appears to be 4.12.2.2.
E61	4.15.3.1	4-94	29	The SEIS text refers to Table 4-21, which is a summary table. However, the sentence is discussing how emissions will be similar to Fermi 2. Therefore, it appears that a reference to Table 4-20 may be intended.
E62	4.15.3.1	4-94	40	The SEIS gives the emissions as 1.3 million tons of CO <sub>2eq</sub> per year with 1.2 MT/year in parentheses. The units in parentheses appear to be incorrect. For consistency with other values in this section, the units should be <i>million</i> MT/year.
E63	4.15.3.2	4-98	22	The reference citation “Mackey et al. 2012” should be “Mackey 2012” for consistency with how it is shown in the Section 4.18 list of references.
	4.18	4-141	37	

Comment Number	Section	Page	Line	Comment
E64	4.15.3.2	4-101	38 - 40	The sentence discussing increased water temperatures in Lake Erie is worded in a confusing manner. DTE recommends revising “the potential for adverse effects these organisms that can be a threat to human health” to “the potential adverse effects <i>that</i> these organisms <i>can present</i> to human health”.
E65	4.16	4-102	34	The phrase “current license terms” should be “current license <i>term</i> ”.
E66	4.16.1.1	4-104	4	The SEIS text says “As discussed in section,” but does not give a section number. It is not clear which section is being referenced.
E67	4.16.3.1	4-110	12	The phrase “population growth and accompany land use changes” appears to be incorrect. The word “accompany” should be “accompanying”.
E68	4.16.4	4-116	32 - 33	The reference to “Table-1 in Appendix E” should be “Table <i>E-1</i> in Appendix E” as shown on line 6 of the page.
E69	4.16.11	4-128	29, 31 38, 39	The reference citations to “EPA 2014e” on lines 29 and 31 and to “EPA 2014f” on lines 38 and 39 should be changed to “EPA 2014g” and “EPA 2014h”, respectively, as these references better correlate with the information being discussed.
E70	4.16.11	4-129	Table 4-23	In the Table 4-23 row for Monroe County, Michigan (2011), “footnote (d)” should be “footnote (c)”.  In addition, in the row for Fermi 2 emissions, “footnote (4)” should be “footnote (d)”.
E71	4.18	4-137 4-146	40 - 43 14 - 18, 19 - 24	The entire references of “EPA 2012a”, “Sharp 2007”, and “Solomon 2007” are shown as hyperlinks. Only the portion of the reference that is the website address should be shown in the hyperlink format.
E72	4.18	4-144	10	The words “of Satellite” are repeated in the title of the reference.

Comment Number	Section	Page	Line	Comment
E73	4.18	4-145	26	The ADAMS ML number listed for reference "NRC 2014f" (ML14279A562) appears to be incorrect. The correct number appears to be ML14295A239.
E74	7	7-2	Table 7-1	The address for Dr. Stephen McNew should be "Raisinville Road" instead of "Roisinville Road".
E75	App. A	A-1	18	There is a period after "Table A-1" that appears to be extraneous.
E76	App. A	A-8	16, 19, 23	The word "Comment" is not included before 025-V-17, 012-BB-3, and 012-CC-2. Elsewhere in Appendix A the word "Comment" is included prior to the comment number. The word "Comment" should be added for consistency.
E77	App. A	A-10 A-12	24 17	The phrase "Based its review..." should be "Based <i>on</i> its review..." on pages A-10 and A-12.
E78	App. A	A-31	17	The SEIS text cites reference "DTE 2014a". In Section A.12 there is no reference DTE 2014a. There is a reference DTE 2014. The reference should be corrected for consistency with the list of references in Section A.12.
E79	App. A	A-43	42	The SEIS text says that Appendix D describes the ESA Section 7 consultation. However, the ESA Section 7 consultation is in Appendix C rather than Appendix D. It should be corrected to say Appendix C.
E80	App. A	A-44	28	The ADAMS ML number for reference "DTE 2015a" (ML15037A229) appears to be incorrect. The correct ML number appears to be ML15009A358.
E81	App. D	D-1	Table D-1	There are two entries in Table D-1 for the date May 5, 2014. The ML numbers in ADAMS do not match the numbers in Table D-1; the ML numbers for the two entries appear to be reversed. The ML numbers should be switched between the two May 5, 2014 entries.
E82	App. F	F-3	Table F-1	Change footnote designation "©" to "(c)".
E83	App. F.2.2.4	F-17	37	The phrase "license amendment was improved" should be "license amendment was <i>approved</i> ".

Comment Number	Section	Page	Line	Comment
E84	App. F.8	F-57	18 - 20	The full title of the DECo 1996 letter was "Submittal of the Detroit Edison Individual Plant Examination for External Events (IPEEE) Report – Response to Generic Letter 88-20, Supplement 4".
E85	App. F.8	F-57	42	The ADAMS ML number listed for reference DTE 2015a (ML15037A229) appears to be incorrect. The correct number appears to be ML15009A358 (see SEIS page D-3).
E86	App. F.8	F-58	20	In the title of NEI 05-01, "Alternative" should be "Alternatives".
E87	App. F.8	F-60	9	The letter was dated November 18, 2014 (see SEIS page D-3).