

Gallagher, Carol

Subject: FW: Updates, Minor Corrections, and Suggested Clarifications Regarding Draft NUREG-1437 Supplement 57
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From: Ranek, Nancy L.:(GenCo-Nuc) [mailto:Nancy.Ranek@exeloncorp.com]
Sent: Tuesday, April 05, 2016 10:20 AM
To: Ford, William <William.Ford@nrc.gov>
Cc: Drucker, David <David.Drucker@nrc.gov>
Subject: [External_Sender] Updates, Minor Corrections, and Suggested Clarifications Regarding Draft NUREG-1437 Supplement 57

Hi Bill –

I am attaching a PDF file containing a list of updates, minor corrections, and suggested clarifications for your consideration related to the Draft NUREG-1437, Supplement 57.

In addition to the attached minor comments, Exelon Generation filed a formal comment package regarding the Draft NUREG-1437, Supplement 57 on 4/4/2016.

Please call if there are questions.

Many thanks.

Nancy

Nancy L. Ranek
License Renewal Environmental Lead
Exelon Generation, LLC
200 Exelon Way, KSA/2-E
Kennett Square, PA 19348
Phone: 610-765-5369
Fax: 610-765-5658
Email: nancy.ranek@exeloncorp.com

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RULES AND DIRECTIVES
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SUNSI Review Complete
Template = ADM – 013
E-RIDS= ADM-03
Add= W. Ford (whf)
D. Drucker (dmd3)

Exelon Generation Company, LLC
Updates, Minor Corrections, and Suggested Clarifications in Draft Generic Environmental
Impact Statement for License Renewal of Nuclear Plants, Supplement 57 Regarding
LaSalle County Station, Units 1 and 2

NOTE: Where changes to draft text are suggested, proposed inserts are in ***bolded italic*** font and proposed deletions are in ~~strikethrough~~ font.

Item #	Section #	Page #	Line #	Comment
1.	Ex. Sum.	xxi	11	In line 11 on p. xxi, clarify the text as follows: <p style="text-align: center;">“... <i>License Renewal of Nuclear Plants (June 2013).</i>”</p>
2.	Ex. Sum.	xxi	28	In line 28 on p. xxi, clarify the text as follows: <p style="text-align: center;">“... licenses (NPF-11 and NPF-18) expire on April 17, 2022, and December 16, 2023, <i>respectively.</i> The NRC’s ...”</p>
3.	Ex. Sum.	xxii	37 to 39	In lines 37 to 39 on p. xxii, correct and clarify the text as follows: <p style="text-align: center;">“The NRC staff did find new information regarding <i>one</i> Category 1 a uranium fuel cycle issue (Transportation), but <i>the NRC staff determined that</i> this new information <i>is</i> not considered significant and therefore <i>it does</i> not affect the conclusions for <i>this</i> issues presented in the GEIS. ...”</p>
4.	Ex. Sum.	xxiii	Table ES-1	In the “Special Status Species and Habitats” row of the “Relevant Category 2 Issues” column in Table ES-1, correct the entry to read as follows: <p style="text-align: center;">“Threatened, endangered, and <i>protected</i> species and essential fish habitat”</p>
5.	Ex. Sum.	xxiii and 4-131	Table ES-1 and Table 4-24	The following inconsistencies between Table ES-1 (p. xxiii) and Table 4-24 (p. 4-131) should be resolved: In the “Resource Area” column: <p style="text-align: center;">“Aquatic Resources” vs. “Aquatic Ecology”</p> In the “Resource Area” column (Table 4-24) and the “Relevant Category 2 Issues” column (Table ES-1): <p style="text-align: center;">“Socioeconomics” vs. “Socioeconomic”</p>
6.	Ex. Sum.	xxiv	16	In line 16 on p. xxiv, edit the text as follows: <ul style="list-style-type: none"> • natural gas combined-cycle (NGCC); and
7.	Abbreviations and Acronyms	xxvii	N/A	Many acronyms used throughout the DSEIS are not defined in the list of abbreviations and acronyms (e.g., ALARA). Conversely, there are defined acronyms in the table that are not otherwise used in the DSEIS (e.g., SMA). Consider editing the list to add entries for acronyms and abbreviations that are used in the DSEIS but have been omitted and to delete entries that are not used in the DSEIS.

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Item #	Section #	Page #	Line #	Comment
8.	1.1	1-1	19	In line 19 on p. 1-1, clarify the relationship between the licenses and expiration dates as follows: “... the existing licenses (NPF-11 and NPF-18) expire on April 17, 2022, and December 16, 2023, respectively. ”
9.	1.3	1-2	7	In line 7 on p. 1-2, further clarify the sources of information available to the NRC staff during its preparation of the LSCS SEIS as follows: “...(NRC 2015b). Following the site audit, Exelon submitted a revision to the ER on July 31, 2015 (ADAMS Accession No. ML15212A259) as well as responses to requests for additional information (RAIs) from the NRC staff on July 2, 2015 (ADAMS Accession No. ML15195A351). ”
10.	1.4	1-3	9	In line 9 on p. 1-3, clarify the text as follows: “... verify. Of these issues, the NRC staff determined that some generic issues are generic to all ...”
11.	1.5	1-4	16	In line 16 on p. 1-4, clarify that the SEIS represents the staff's recommendation as follows: “... Chapter 5 presents the NRC's NRC staff's recommendation”
12.	1.5	1-5	1	In line 1 on p. 1-5, clarify that the NRC will make a final determination on license renewal as follows: “... The NRC will make reach its final recommendation determination after ...”
13.	1.6	1-5	28 to 29 and 31	In lines 28 to 29 and 31 on p. 1-5, clarify the text as follows: “... this GEIS SEIS will provide the NRC's decisionmaker (in this case, the Commission) with ...”
14.	1.8	1-6	3 to 4	In lines 3 to 4 on p. 1-6, clarify the reason for contacting the listed tribes as follows, assuming that the suggested change is accurate: “... following agencies and groups; The listed Tribes were selected based on their historical and cultural ties with the region of interest. Appendix C provides a discussion of the consultation lists and discusses consultation documents. ... ”
15.	2.0	2-1	18 to 19	In lines 18 to 19 on p. 2-1, consider editing the text as follows because the feasibility of alternatives is evaluated in the DSEIS and some are judged to not be feasible: “...energy-planning decisions and makes no judgment as to which energy alternatives evaluated would be the most likely alternative in any given case. ”

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16.	2.1.3	2-2	36 to 37	In lines 36 to 37 on p. 2-2, clarify the text as follows: “... For multiple unit sites, such as LSCS, if one unit is shut down, then shared systems may operate at reduced capacities.”
17.	2.2.2.4	2-15	24 to 25	In lines 24 to 25 on p. 2-15, clarify the text as follows: “... Distance separation ensures reduces the likelihood that the two wind farms will not simultaneously experience the same climate weather conditions , and power will likely be ...”
18.	2.3.11	2-23	8	In line 8 on p. 2-23, clarify the text as follows: “... Given the relatively high cost of oil in comparison to natural gas and the small generating capacity ...”
19.	3.1.1	3-1	14 to 17	In lines 14 to 17 on p. 3-1, the distance from LSCS to the Braidwood Station in Braceville, IL is presented, but not the distance to the Dresden Nuclear Power Station in Morris, IL. Because Figure 3-1 shows the locations of both Braidwood and Dresden stations, consider adding the distance from LSCS to Dresden station.
20.	3.1.1	3-1	19	In line 19 on p. 3-1, clarify that Exelon Generation is does not own or operate the wind turbines as follows: “... dominated by many wind turbines, none of which is owned or operated by Exelon Generation . Each wind turbine is 389 feet (ft) (119 meters (m)) tall (which ...”
21.	3.1.1	3-1	32 to 33	Correct the typographical error in lines 32 to 33 on p. 3-1 as follows: “... by the Illinois Department of Natural Resources (IDNR) for hunting and wildlife habitat. County County Road 6 (also known as North 21st Road) provides access to LSCS and runs along the site’s ...”
22.	3.1.2	3-6	6	In line 6 on p. 3-6, clarify the text as follows: “... and holds appropriate permits to withdraws makeup water from, and discharges cooling pond blowdown water to, the Illinois River (Exelon 2014a).”
23.	3.1.3	3-6	36 to 38	In lines 36 to 38 on p. 3-6, clarify the text as follows: “Cooling water that is not otherwise lost from the pond through evaporation or seepage or that is consumed in the process is recirculated from the cooling pond through the condenser systems in a continuous loop.”
24.	3.1.3	3-6	39	In line 39 on p. 3-6, change “continuously” to “continuous” as follows: “... blowdown on a near continuously basis under normal

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				conditions. ...”
25.	3.1.3	3-6	40	In line 40 on p. 3-6, replace the word “rinsed” with the word “diverted,” as follows: “... rinsed diverted from the cooling system (i.e., cooling pond) ...”
26.	3.1.3	3-6	46	In line 46 on p. 3-6, clarify the text as follows: “... The intake and blowdown pipelines are routed below ground through ...”
27.	3.1.3	3-10	24	In line 24 on p. 3-10, clarify the text as follows: “... cooling pond through a 60-in. (152-cm), underground pipeline. Upon reaching the pond, the water is...”
28.	3.1.3	3-11	35	In line 35 on p. 3-11, spell out the acronym as follows because this is the first time it is used in the DSEIS: “... standards (35 Illinois Administrative Code [IAC] 302) and Special Condition 3 of Exelon’s NPDES Permit No. IL0048151 ...” The term “IAC” should also be added to the list of acronyms and abbreviations in the front material of the DSEIS.
29.	3.1.3	3-11	39 to 44	In lines 30 to 44 on p. 3-11, clarify the text as follows: “Blowdown combined with other comingled effluent streams flows through an open channel originating at the west shore of the cooling pond (UHS portion) and then northwest to a spillway adjacent to the LSCS discharge canal. After this This combined effluent stream enters the cooling pond blowdown pipe, it can include receive processed liquid radioactive waste (radwaste), which may be discharged on a batch basis directly into the cooling pond blowdown line at a maximum rate of 45 gpm (0.17 cubic meters per minute), as further described in Section 3.5.1.3 of this SEIS (Exelon 2014a).”
30.	3.1.3	3-12	1	In line 1 on p. 3-12, correct the typographical error as follows: “... approximately 500-ft- (150-m)-long discharge structure consisting o 1 f a plunge pool and rip-raped rip-rapped ...”
31.	3.1.3	3-12	5	In line 5 on p. 3-12, correct the typographical error as follows: “... motor-operated values valves at both the river and lake ends of the discharge line can be used to ...”
32.	3.1.4	3-13	14	In line 14 on p. 3-13, edit the text as follows: “There is also a class of waste, called mixed waste, that which is both radioactive and hazardous. The ...”

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33.	3.1.4.4	3-17	31 to 32	In lines 31 to 32 on p. 3-17, edit the text as follows: "... storage of spent nuclear fuel, high-level radioactive waste, and reactor-related Greater than class C Greater-Than-Class-C waste. ..."
34.	3.1.4.5	3-17	45	In line 45 on p. 3-17, for consistency with usage elsewhere in the DSEIS, change "ground water"(two words) to "groundwater" (one word).
35.	3.1.5	3-18	18	In line 18 on p. 3-18, edit the text as follows; "... LSCS is typically a small quantity hazardous waste ..."
36.	3.1.5	3-18	23	In line 23 on p. 3-18, edit the text as follows: "... waste used oil, grease, antifreeze, adhesives, and other petroleum-based liquids." ...
37.	3.1.5	3-18	30 to 32	In lines 30 to 32 on p. 3-18, clarify the sentence as follows because recyclables are not categorized as "wastes": Other wastes used materials , such as, oils, metals, paper, and other recyclables are managed recycled according to Exelon procedures and Illinois regulations.
38.	3.1.6.2	3-19	27	In line 27 on p. 3-19, clarify that the quantity of fuel reported in the text is the total of the nominal capacities of all of the fuel tanks at LSCS, rather than the inventory of onsite fuel, as follows: "... site. In total, LSCS has nominal onsite capacities to store as much as Exelon stores 204,080 gal (772,530 liters) of diesel fuel and gasoline for a variety ..."
39.	3.1.6.5	3-20	37 to 39	In lines 37 to 39 on p. 3-20, clarify the sentence as follows because Exelon did not identify the onsite electrical connections as being "in scope:" Exelon (2015h) NRC has determined that the four electrical connections between the main plant and the LSCS switchyard are in scope for the license renewal environmental review (NRC Letter to Exelon (M. Gallagher) regarding Request for Additional Information Regarding the LaSalle County Station, Units 1 and 2, License Renewal Application Environmental Review, dated 5/22/2015, RAI LU-5d, ADAMS Accession No. ML15139A586).
40.	3.2.1.1	3-21	22	In line 22 on p. 3-21, correct the typographical error as follows: "... grassland, old field, scrub shrub -scrub, and small forested fragments (Exelon 2015p)."
41.	3.3.1	3-24	34	In line 34 on p. 3-24, correct the typographical error as follows: "... State state , and flooding is the most damaging weather-

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				related hazard in Illinois (NCDC 2004)."
42.	3.3.2	3-27	10 to 11	<p>In lines 10 to 11 on p. 3-27, correct the text as follows:</p> <p>"Permitted sources at LSCS include five large diesel-fired generators (greater than 600 horsepower), a gasoline storage tank, and gasoline dispensing facilities three 500-kw diesel-fired generators, and other small engines (less than 600 horsepower). ..."</p> <p>This correction is needed because of changes in the renewed FESOP (issued on August 12, 2015).</p>
43.	3.3.2	3-27	13 to 14	<p>In lines 13 to 14 on p. 3-27, correct the text as follows:</p> <p>"... from theall diesel-fired generators, and storage tank, as well as the annual diesel fuel consumption of the diesel generators and gasoline of the fuel storage tank is also limited. LSCS has been in compliance with the ..."</p> <p>This correction is needed because of changes in the renewed FESOP (issued on August 12, 2015).</p>
44.	3.3.2	3-27	17 to 21	<p>In lines 17 to 21 on p. 3-27, correct the text as follows:</p> <p>"... presented in Table 3-4. LSCS also has additional air emission sources that are exempt from permitting requirements, but it must still comply with applicable environmental laws and regulations. These air emission sources include Diesel pumps and generators that are less than 600 horsepower and that are intended to be used during emergency circumstances and only operated during routine surveillance and testing must also comply with other applicable environmental regulations, as indicated in the FESOP permit (Exelon 2015)). Air emissions for LaSalle ..."</p> <p>This correction is needed because of changes in the renewed FESOP (issued on August 12, 2015).</p>
45.	3.3.2	3-27	21 to 25	<p>In lines 21 to 25 on p. 3-27, edit as follows to ensure that the text clearly distinguishes between emissions from LSCS and LaSalle County as a whole:</p> <p>"... As shown in Table 3-4, however, LSCS permitted annual emissions are less than 1 percent of the total 2011 emissions for LaSalle County. Total air Air emissions forfrom all sources in LaSalle County in 2011 for carbon monoxide, nitrogen oxides, sulfur dioxide, particulate matter less than 10 µm, and particulate matter less than 2.5 µm were 1,213 tons, 2,308 tons, 611 tons, 832 tons, and 483 tons, respectively (EPA 2011). LSCS permitted annual emissions are less than 1 percent of the total 2011</p>

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				emissions for LaSalle County."
46.	3.3.2	3-27	Table 3-4	On p. 3-27, correct the "Sources" cited in Table 3-4 as follows: "Sources: Exelon 2014a, 2015k"
47.	3.3.2	3-28	10	In line 10 on p. 3-28, edit the text as follows: "...Refuge, which is approximately 306 mi (492 km) southwest of the LSCS site. EPA recommends ..." This change is needed because "RHR" is defined as "residual heat removal" in the abbreviations table and is used as such throughout the DSEIS, except in line 10 on page 3-28.
48.	3.3.2	3-28	15	In line 16 on p. 3-28, clarify the location of the Mingo National Wildlife Refuge as follows: "... Refuge, which is located in Missouri approximately 306 mi (492 km) southwest of the LSCS site. EPA recommends ..."
49.	3.5.1.2	3-41	18	In line 18 on p. 3-41, correct the typographical error as follows: "... Agrium U.S., Inc., and PCEPCS Phosphate, Marseilles Operation. The volume of water withdrawn ..."
50.	3.5.1.3	3-43	2 to 3	In lines 2 to 3 on p. 3-43, clarify the sentence as follows : "... The EPA or the state, not the NRC, sets the limits for effluents and cooling water system operational parameters in plant-specific NPDES permits. ..."
51.	3.5.1.3	3-45	37	In line 37 on p. 3-45, edit the text as follows: "To maintain LSCS's surface water intake system on the Marseilles Pool of the Illinois River, Exelon ..." Insert "the" before "Marseilles Pool"
52.	3.7.1.1	3-60	13	In line 13 on p. 3-60, clarify the text as follows: "... primary food source for many whales , fish, and other animals, and consists of bacteria, ..." This clarification is suggested because whales are not found in the Illinois River.
53.	3.7.1.1	3-62	10	In line 10 on p 3-62, correct the term "cyprinidae" by changing it to either "Cyprinidae" or "cyprinids."
54.	3.7.1.1	3-66	Table 3-10, Footnote (d)	In Table 3-10 on p. 3-66, correct the 1 st line and the 3 rd line in footnote (d) as follows: "X= one of the six six most commonly collected species, based on the number of individuals collected during electrofishing or seining sampling within a single time period. Note that a species may still have been observed during the

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				collection period even if it was not one of the sixth six most commonly collected species."
55.	3.7.1.1	3-67	4	In line 4 on p. 3-67, correct the typographical error as follows: "... Table 3-11 have generally increased overtime over time . These data suggest that water quality within the ..."
56.	3.7.2	3-67	12 to 13	In line 12 on p. 3-67, clarify the text as follows : "... which maintains the leased portion of the LSCS cooling pond as an outdoor ..."
57.	3.7.2	3-68	1	In line 1 on p. 3-68, clarify the text as follows : "... IDNR has actively managed the fish populations in the LSCS cooling pond ..."
58.	3.7.2.1	3-68	9	In line 9 on p. 3-68, clarify the text as follows: "IDNR stocks the LSCS cooling pond each year. In 1981, IDNR's the research fish hatchery located adjacent ..."
59.	3.7.2.2	3-69	24	In line 24 on p. 3-69, delete the word "shad" at the beginning of the line.
60.	3.10.3	3-86	20	In line 20 on p. 3-86, clarify the text as follows: "... moderate to high rates. Population projections for years 2020 and through 2040 shown in the table ..." This clarification is suggested because, as indicated in the "Sources" information for Table 3-19, the population data for 2030 as well as 2020 and 2040 were developed based on IDOT 2012.
61.	3.10.3	3-87	Table 3-21	In Table 3-21 on pages 3-87 to 3-88, the distinction for Grundy County intended by the parenthetical in the table's title and in footnote (a) is not clear. The title for Table 3-21 suggests that Grundy County data are from 2013, rather than 2014, which is the year from which data are provided for LaSalle and Will Counties. Similarly, footnote (a), which applies only to the "Grundy" column, cites a source that only covers years 2011 to 2013. However, in the "Total Population" row in Table 3-21, the "Grundy" column entry (50,425) is equal to the estimated 2014 Grundy County population from Table 3-19. Confirm that the "Grundy" column entry (50,425) for the "Total Population" row is correct for 2013. If not, then clarify in Table 3-21 that the "Total Population" entry in the "Grundy" column is for 2014.
62.	3.10.5	3-94	Table 3-26	In the "Source" row for Table 3-26 on p. 3-94, add a reference for the LSCS tax data presented in the "2014" row. In an email message from N. Ranek to D. Drucker dated January 14, 2016, Exelon provided the data for the LSCS 2014 taxes paid.

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63.	3.10.5	3-94	Table 3-26, footnotes	In a footnote to Table 3-36 on p. 3-94, the term "NA" is defined. Because "NA" is not used in Table 3-26, consider deleting the footnote that defines it.
64.	3.10.5	3-95	9 to 10	In lines 9 to 10 on p. 3-95, clarify the text as follows: <p style="text-align: center;">"... settlement agreements could result in higher <i>or lower</i> property tax assessments and <i>correspondingly</i> higher <i>or lower</i> property tax payments."</p>
65.	3.11.5	3-100	39	In line 39 on p. 3-100, correct the text by deleting the opening quote mark in the sentence that begins near the end of the line, as follows: <p style="text-align: center;">"... The "VPP ..."</p>
66.	4.3.2.2	4-7	1 st line, 1 st ¶	In the 1 st line of the 1 st paragraph in section 4.3.2.2, correct the text as follows: <p style="text-align: center;">"... When the plant stops operating, there will <i>be</i> a reduction in noise from activities related to plant ..."</p>
67.	4.7.1.2	4-42	9 th line, 2 nd full ¶	In 9 th line of the 2 nd full paragraph on p. 4-42, correct the text as follows: <p style="text-align: center;">"... redhorse (<i>Moxostoma erythrurum</i>), and blue gill<i>bluegill</i> (<i>Lepomis macrochirus</i>) were among the six ..."</p>
68.	4.10.2.1	4-66	7 th to 9 th lines, 1 st full ¶	In the 7 th to 9 th lines (last sentence) of the 1 st full paragraph on p. 4-66, clarify the text as follows: <p style="text-align: center;">"... The socioeconomic impacts from the termination of <i>licensed activities</i>nuclear plant operations (which would<i>may</i> not entirely cease until after decommissioning) would ..."</p>
69.	4.11.1.2	4-77 to 4-78	Last partial sentence on p. 4-77 and 1 st partial sentence on p. 4-78	Clarify the last partial sentence on p. 4-77 and 1 st partial sentence on p. 4-78 as follows: <p style="text-align: center;">"... Pursuant to 10 CFR Part 54, the only changes that the applicant must implement as part of the license renewal process are those that are identified as being cost beneficial, that provide a significant reduction in total risk, and that are related to adequately managing the effects of aging during the period of extended operation. <i>If a SAMA determined to be potentially cost-beneficial is not related to adequately managing the effects of aging during the period of extended operation, then it is not required to be implemented as part of the license renewal process under 10 CFR Part 54.</i>"</p> <p>This clarification is suggested because, as originally written, the existing statement could be construed to mean that the NRC Staff's application of 10 CFR Part 54's requirements involves a cost-benefit analysis or risk assessment. It does not. Part 54 is</p>

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				<p>concerned solely with aging management, and whether there is reasonable assurance that structures and components that perform license renewal intended functions will continue to perform those functions consistent with the current licensing basis (CLB) during the period of extended operation. Additionally, the phrase "providing a significant reduction in total risk" arguably could be construed as suggesting that the NRC Staff can impose a backfit as part of license renewal under Part 54. That conclusion is contrary to NRC regulatory and adjudicatory precedent holding that modifications to a facility's operating license occur outside of the renewal review, and that any questions regarding the adequacy of the CLB are separately addressed under the backfit rule (10 CFR 50.109).</p>
70.	4.11.1.2 and F.6.1	4-87 and F-42	37 to 38 and 5 to 7	<p>In lines 37 to 38 on p. 4-87 and in lines 5 to 7 on p. F-42, clarify the following sentence:</p> <p style="padding-left: 40px;">"Because Exelon did not take <i>a priori</i> credit for installation of the hardened vent pipe, revision to the optimal set assessment was not required."</p> <p>Clarification is recommended because the meaning of the sentence quoted above is unclear. Regarding the "optimal set" assessment, Exelon did take credit for the hardened pipe vent.</p>
71.	4.13.2	4-98	18	<p>In line 18 on p. 4-98, correct the typographical error as follows:</p> <p style="padding-left: 40px;">"Section 4.14.24.15.2 of this SEIS, the NRC staff concludes that the impacts from decommissioning ..."</p>
72.	Appendix B	B-7	Table B-2	<p>In the "Number" column of Table B-2, the information in the "FESOP" row should be updated as follows:</p> <p style="padding-left: 40px;">Application #75044008675040086 ID# 099802AA099802AAA</p> <p>In the "Dates" column of Table B-2, the information in the "FESOP" row should be updated as follows:</p> <p style="padding-left: 40px;">Issued: 01/07/2016 Expires: 08/12/2025 Renewal application submitted 7/15/2005^(a)</p> <p>Also, delete Footnote (a).</p>

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73.	Appendix B	B-7	Table B-2	<p>In the "Number" column of Table B-2, the information in the "Department of Army permit for maintenance dredging" row should be updated as follows:</p> <p style="text-align: center;">CEMVR-OD-P-2006-185CEMVR-OD-P-2015-1458</p> <p>In the "Dates" column of Table B-2, the information in the "Department of Army permit for maintenance dredging" row should be updated as follows:</p> <p style="text-align: center;">Issued: 04/16/200601/25/2016 Expires: 12/31/2015^(b)03/18/2017</p> <p>Also, delete Footnote (b)</p>
74.	App. F Section F.3.2	F-28	25	<p>In line 25 on p. F-28, correct the typographical error as follows:</p> <p>"... be posted (with portable extinguishesextinguishers available) and for nearby equipment to be protected when ..."</p>