



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

August 26, 2016

Mr. Kenneth A. Westlake
Chief, NEPA Implementation Section
Office of Enforcement and Compliance Assurance
US EPA - Region 5
77 W Jackson Blvd Mail Code: E-19J
Chicago, IL 60604

SUBJECT: NOTICE OF AVAILABILITY OF THE FINAL PLANT-SPECIFIC SUPPLEMENT
57 TO THE GENERIC ENVIRONMENTAL IMPACT STATEMENT FOR
LICENSE RENEWAL OF NUCLEAR PLANTS REGARDING LASALLE
COUNTY STATION, UNITS 1 AND 2 (TAC NOS. MF5567 AND MF5568)

Dear Mr. Westlake:

Enclosed are one bound copy and one electronic copy of final Supplement 57 to NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants," (GEIS) regarding the license renewal of LaSalle County Station, Units 1 and 2 (LSCS).

Final Supplement 57 to the GEIS will be submitted to the U.S. Environmental Protection Agency (EPA) via e-NEPA. In addition, a copy of final Supplement 57 to the GEIS is being mailed or e-mailed to interested Federal and State agencies, industry organizations, interest groups, and members of the public. A copy of this document has also been placed in the U.S. Nuclear Regulatory Commission (NRC) Public Document Room, One White Flint North, 11555 Rockville Pike, Rockville, Maryland 20852, and in the NRC Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible on the NRC website at <http://www.nrc.gov/reading-rm/adams.html>. The ADAMS accession number for final Supplement 57 to the GEIS is ML16238A029.

The NRC received the EPA letter dated April 4, 2016, providing comments on draft Supplement 57 to the GEIS. The NRC responses to these comments are enclosed and can also be found in Appendix A of final Supplement 57 to the GEIS.

K. Westlake

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If further information is required, please contact Mr. William Ford, project manager for this environmental review, by telephone at 301-415-6223 or by e-mail at william.ford@nrc.gov.

Sincerely,

/RA/

James G. Danna, Chief
Environmental Review
and Project Branch
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos. 50-373 and 50-374

Enclosure:
As stated

cc w/encl: Listserv

Ms. Elizabeth Poole
NEPA Implementation Section
US EPA - Region 5
77 W Jackson Blvd
Chicago, IL 60604

K. Westlake

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Docket Nos. 50-373 and 50-374

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As stated

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Ms. Elizabeth Poole
NEPA Implementation Section
US EPA - Region 5
77 W Jackson Blvd
Chicago, IL 60604

DISTRIBUTION: See next page

ADAMS Accession Nos.: Letter: ML16224A786, GEIS Supplement 57:

*concurred via email

OFFICE	LA:DLR*	OGC*	PM:RERP:DLR	BC:RERP:DLR
NAME	IBetts	JWachutka	WFord	JDanna
DATE	8/16/16	8/05/16	08/26 /16	08/26/16

OFFICIAL RECORD COPY

Letter from J. Danna to K. Westlake dated August 26, 2016

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NOTICE OF AVAILABILITY OF THE FINAL PLANT-SPECIFIC SUPPLEMENT
57 TO THE GENERIC ENVIRONMENTAL IMPACT STATEMENT FOR
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STATION, UNITS 1 AND 2 (TAC NOS. MF5567 AND MF5568)

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**U.S. Nuclear Regulatory Commission (NRC) Staff Responses to U.S
Environmental Protection Agency (EPA) Comments on Draft Supplement 57 to
the Generic Environmental Impact Statement
Regarding LaSalle County Station, Units 1 and 2**

Comment on Surface Water

The Draft Supplemental Environmental Impact Statement (SEIS) states that the river intake pipeline has experienced “a number of breaks” resulting in flooding and erosion of areas around the breaks. We note these breaks are not safety related and were reported to both U.S. EPA and Illinois EPA, per provisions of the National Pollution Discharge Elimination System permit. The document states that several structural and procedural measures have been taken to address the issue. The Draft SEIS does not state whether the measures have successfully repaired the breaks and eliminated recurrence of this problem, including whether flooding and erosion have been successfully addressed.

Recommendation: The Final SEIS should clarify whether the mentioned structural and procedural improvements to reduce incidences of leaks and improve response have been successful and whether the resulting flooding and erosion has been successfully addressed. We recommend any further work on the intake system be considered refurbishment activities and be included as part of the analysis in the Final SEIS.

Response: *EPA requests that the final SEIS discuss whether the measures taken by Exelon, as cited in the SEIS, to prevent and respond to breaks that have occurred in LaSalle County Station’s (LSCS’s) river intake pipeline have been successful, including associated flooding and erosion. EPA also suggests that the operation and maintenance actions taken by Exelon be considered refurbishment activities and included in the final SEIS.*

The NRC staff agrees with the comment in part and disagrees with it in part. The discussion of pipeline failures is presented within the context of past and present actions at licensed nuclear power plants and includes an explanation on how they have shaped the current natural and human-built environment. These existing conditions serve as the baseline for the evaluation of the potential impacts of continued operations during the license renewal term. The NRC staff agrees that additional information on the nature of the impacts experienced to date and on measures taken to repair pipeline leaks and to restore the affected environment would be appropriate and informative. Therefore, the discussion in Section 3.1.3 was expanded in this regard. However, the NRC staff offers no assessment as to whether the actions taken by Exelon have been successful in reducing the frequency of pipeline failures. As noted by EPA, the pipeline serves no safety-related function; therefore, its operation is not directly regulated by the NRC. Exelon has taken action to report, respond, and repair pipeline failures in accordance with its operation and maintenance procedures and applicable State laws and regulations, including the reporting provisions contained in the National Pollutant Discharge Elimination System (NPDES) permit issued to LSCS.

The NRC staff also disagrees that any ongoing or future work undertaken by Exelon to reduce the frequency and impacts of pipeline breaks should be considered refurbishment and discussed as such in the SEIS. The NRC’s regulations at Title 10 of the Code of Federal Regulations (10 CFR) 51.53(c)(2) prescribe the content of ERs that reactor licensees seeking

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license renewal must submit to the NRC. In their ERs, licensees must describe in detail the affected environment around the plant, the modifications directly affecting the environment or any plant effluents, and any planned refurbishment activities. As summarized in Section 2.1.2 of this SEIS, the NRC considers refurbishment to encompass the replacement and repair of major systems, structures, and components to ensure the safe and economic operation of nuclear plants beyond the current license term(s). In its ER, as indicated in Section 2.1.2 of this SEIS, Exelon did not identify any major refurbishment or replacement activities needed to support the continued operation of LSCS beyond the existing operating license terms. Therefore, the NRC staff considers Exelon's actions to reduce the frequency and severity of pipeline breaks to constitute operation and maintenance, which Exelon would be expected to continue to perform during the current license terms regardless of a license renewal decision.

Comment on Greenhouse Gases/Climate Change

The Draft SEIS includes estimated greenhouse gas (GHG) emissions as result of the preferred alternative (beginning on page 4–104), including emissions from stationary combustion sources, fugitive emissions, purchased electricity, and refrigerant-related sources. Per Table 4–21, totals range from 34,228 to 39,997 metric tons of carbon dioxide equivalents per year (MT/yr of CO_{2e}). Table 4–22 lists the direct GHG emissions from operation of the proposed action and alternatives, which lists an estimated 1,022 MT/yr of CO_{2e} as a result of continued operation of LSCS. As stated in the footnote, direct impacts for the LSCS continued operation and new nuclear alternatives only include emissions from stationary combustion sources. EPA assumes that the emissions from other sources (e.g., fugitive emissions, purchased electricity, and refrigerant-related sources) are a result of necessary actions to ensure the continued safe operation of LSCS. Therefore, it is unclear why the analysis and Table 4–22 only include emissions from stationary combustion sources and not the other listed sources of GHG emissions.

Recommendation: The Final SEIS should clarify why the alternatives analysis related to GHG does not include sources other than stationary combustion sources. We recommend the Final SEIS either explain in the narrative why the other sources of GHG (e.g., fugitive emissions, purchased electricity, and refrigerant-related sources) are not pertinent to the analysis and conclusion, or amend Table 4–22 to reflect an accurate accounting of GHG emissions from the two nuclear alternatives (LSCS continued operation and new nuclear).

Response: *The commenter recommends that the SEIS clarify why Table 4–22 of the LSCS SEIS only includes direct GHG emission from combustion sources or that the staff revise Table 4–22 to account for GHG emissions from various sources at LSCS. Table 4–22 of the SEIS only presents direct emissions resulting from operation of LSCS in order to provide a commensurate comparison of the proposed action (LSCS continued operation) and the Alternatives. The GHG emissions evaluated and presented in Table 4–22 for the Alternatives are the result of gas or coal combustion and, therefore, are direct emissions. As discussed in Section 4.15.3.1 of the SEIS, plant operations at LSCS release GHG emissions from stationary combustion sources, fugitive emissions, purchased electricity, and refrigerant related sources. Purchased electricity is from an offsite electricity supplier; therefore, the emissions are indirect. The supplier, not LSCS, would account for the GHG emissions from purchased electricity. Thus, to provide a commensurate comparison of the GHG emissions of the Alternatives and the proposed action, direct emissions from LSCS were presented in Table 4–22.*

Section 4.15.3.1 has been revised to clarify direct and indirect GHG emissions sources from the operation of LSCS. Clarification has been provided in Table 4–22 explaining why only direct emissions are provided, and Table 4–22 GHG emissions from LSCS were revised to include direct emissions from stationary combustion sources, fugitive emissions, and refrigerant related sources, but not indirect emissions from purchased electricity for the reason discussed above. Additionally, Section 4.16.11 was also revised to present direct LSCS GHG emissions.