

SUNSI Review Complete
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ADD=Elaine keegan, Eric Oesterle, Yvonne Edmonds,
Breonna Compton, LaShawna Lewis, Araceli Billoch

From: Hayden, Keith
To: [Keegan, Elaine](#)
Subject: [External_Sender] EPA comment letter for NUREG 137, Supplement 59
Date: Tuesday, October 09, 2018 4:24:21 PM
Attachments: [EPA comment letter for the Waterford Steam Electric Station Unit 3, NUREG 137, Supplement 59 DEIS.pdf](#)

COMMENT (2)
PUBLICATION DATE: 8/23/2018
CITATION 83 FR 42713

Thank you for submitting the Draft EIS for EPA review and comment. A hard copy of this letter should arrive by mail in the next few days. If you have any questions please contact me at your earliest convenience.

Sincerely,

Keith Hayden
Environmental Scientist/NEPA Specialist
Mail Code: 6EN-WS
USEPA - Region 6
1445 Ross Ave.
Dallas, TX 75202
e: hayden.keith@epa.gov
p: 214.665.2133



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6

**1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733**

October 9, 2018

May Ma, Director
Program Management
Announcements and Editing Branch
Office of Administration, TWFN-7-A-60M
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Ms. Ma:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (EIS) for the Generic EIS for License Renewal of Nuclear Plants, Supplement 59, Regarding Waterford Steam Electric Station, Unit 3 (CEQ No. 20180189) pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations (40 C.F.R. Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The purpose of the Waterford Station license renewal is to extend nuclear power generation capabilities for an additional twenty years beyond the expiration of the current license; which expires on December 18, 2024. Under the Proposed Action – license renewal, the Waterford Station would continue to operate during the license renewal term in the same manner as current operations. The EPA has rated the draft EIS as Lack of Objections (LO). Please refer to the enclosed *Summary of Rating Definitions* for a detailed explanation of the EPA's rating system. In addition, we are providing a clarification comment concerning the ozone National Ambient Air Quality Standards (NAAQS) listed in Table 4.11-1. The 2008 standard of 75 parts per billion (ppb) is listed in the table. Instead it should list the current 2015 ozone standard of 70 ppb. Please revise the EIS to include the 2015 standard for ozone.

We appreciate the opportunity to review and comment on this document. Once completed, please send our office one copy of the final EIS at the address above. If you have any questions, please contact Keith Hayden, the project review lead, at 214-665-2133 or hayden.keith@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Cheryl T. Seager".

Cheryl T. Seager
Director
Compliance Assurance and
Enforcement Division

Enclosure

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION*

A. Rating the Environmental Impact of the Action.

LO (Lack of Objections). The review has not identified any potential environmental impacts requiring substantive changes to the preferred alternative. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposed action.

EC (Environmental Concerns). The review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact.

EO (Environmental Objections). The review has identified significant environmental impacts that should be avoided in order to adequately protect the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). The basis for environmental Objections can include situations:

1. Where an action might violate or be inconsistent with achievement or maintenance of a national environmental standard;
2. Where the Federal agency violates its own substantive environmental requirements that relate to EPA's areas of jurisdiction or expertise;
3. Where there is a violation of an EPA policy declaration;
4. Where there are no applicable standards or where applicable standards will not be violated but there is potential for significant environmental degradation that could be corrected by project modification or other feasible alternatives; or
5. Where proceeding with the proposed action would set a precedent for future actions that collectively could result in significant environmental impacts.

EU (Environmentally Unsatisfactory). The review has identified adverse environmental impacts that are of sufficient magnitude that EPA believes the proposed action must not proceed as proposed. The basis for an environmentally unsatisfactory determination consists of identification of environmentally objectionable impacts as defined above and one or more of the following conditions:

1. The potential violation of or inconsistency with a national environmental standard is substantive and/or will occur on a long-term basis;
2. There are no applicable standards but the severity, duration, or geographical scope of the impacts associated with the proposed action warrant special attention; or

3. The potential environmental impacts resulting from the proposed action are of national importance because of the threat to national environmental resources or to environmental policies.

B. Adequacy of the Impact Statement.

1 (Adequate). The draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

2 (Insufficient Information). The draft EIS does not contain sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the proposal. The identified additional information, data, analyses, or discussion should be included in the final EIS.

3 (Inadequate). The draft EIS does not adequately assess the potentially significant environmental impacts of the proposal, or the reviewer has identified new, reasonably available, alternatives, that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. The identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. This rating indicates EPA's belief that the draft EIS does not meet the purposes of NEPA and/or the Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS.

*From EPA Manual 1640: Policy and Procedures for the Review of Federal Actions Impacting the Environment