

NRR-DRMAPEm Resource

From: Grange, Briana
Sent: Thursday, May 30, 2019 10:39 AM
To: Holden, Leslie E.: (GenCo-Nuc)
Cc: Frank, James E: (GenCo-Nuc); Stalker, Allison C: (GenCo-Nuc); O'Brien, Edwin: (GenCo-Nuc); Snyder, Amy
Subject: RE: RE: Oyster Creek ESA Consultation: Information Requests from NMFS

Leslie,

Thank you for the PSDAR section references. I re-reviewed these sections of the PSDAR this morning to refresh my memory on the contents. However, these sections don't provide information responsive to NMFS's Question 3. NMFS is looking for an analysis of potential impacts to sea turtles and sturgeon resulting from barging and dredging over the course of the decommissioning period. This can be high-level (as we discussed on the phone yesterday), but it needs to address factors such as how listed species would interact with barge vessels, how likely vessel strike would be, vulnerability of listed species to entrainment during dredging, etc., assuming that dredging *may occur* and that some level of barge traffic would occur during the site dismantlement phase. Basically, NMFS needs enough information to conclude that impacts from barging and dredging would be insignificant and discountable (i.e., "not likely to adversely affect" the listed species). The PSDAR does not include such an analysis, so I would still appreciate if Exelon could prepare a response to this question.

NMFS included examples of barging and dredging analyses with its additional information requests, and I think these can be heavily leveraged for a response relevant to Oyster Creek.

- For barging, see the section entitled "Vessel Traffic" on p. 6 of the [NMFS's November 3, 2016 letter to NRC](#) (PDF p. 8 of the document I send to Allison on 5/28).
- For dredging, see "Mechanical Dredging," "Cutterhead Dredging," and "Hopper Dredging" on p. 17-21 of the [NMFS's April 30, 2018, letter to the Federal Highway Administration](#) (or see PDF p. 30-34 of the document I sent to Allison on 5/28).

With respect to Question 1 of NMFS's additional information request, thank you for clarifying on the phone yesterday that Exelon chose 2 percent (rather than 0.012 percent) to calculate sea turtle impingement rate to be conservative in its numbers. Based on yesterday's discussion, I can prepare a response to this question without further Exelon input.

Finally, NMFS plans to have some internal dialogue among their general counsel today related to your question about implementation of T&C 1 of RPM 1 of the biological opinion. I will keep you in the loop as I hear the outcome of that meeting.

Thanks,

Briana

Briana A. Grange
Conservation Biologist

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From: Holden, Leslie E.:(GenCo-Nuc) <Leslie.Holden@exeloncorp.com>
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Cc: Frank, James E:(GenCo-Nuc) <James.Frank@exeloncorp.com>; Stalker, Allison C:(GenCo-Nuc) <[Allison.Stalker@exeloncorp.com](mailto>Allison.Stalker@exeloncorp.com)>; O'Brien, Edwin:(GenCo-Nuc) <Edwin.OBrien@exeloncorp.com>
Subject: [External_Sender] RE: Oyster Creek ESA Consultation: Information Requests from NMFS

Amy and Brianna,

Thank you for the clarification call, we appreciate your time and consideration.

As Amy brought up on the call today, the OCNGS PSDAR covers environmental considerations (Section 5.0, Environmental Impacts). After the call today, we were looking at what has docketed in the Exelon OCNGS PSDAR (ML18141A775) with regards to potential barge use and dredging.. It is covered in the following PSDAR Sections.

- 5.1.1.2, Offsite Land Use
- 5.1.3, Water Quality
- 5.1.5, Aquatic Ecology
- 5.1.7.2, Protected Aquatic Species
- 5.1.7.3, Conclusion (*for Section 5.1.7, Threatened and Endangered Species*)
- 5.1.14, Cultural, Historical, and Archaeological Resources

There is similar wording also in the PSDAR that has been submitted by HOLTEC (ML18275A116), since they would also be governed by the same governmental environmental considerations for barging and dredging.

We thought that this information in the PSDAR would provide you with sufficient already docketed information, in a timely manner, to answer question 3. Since unlike North Anna, we do not know what will be done in the future with regards to barge use or dredging, this information provides you with the actions we would follow and that environmental considerations would be evaluated, if and when barge use or dredging would be considered.

Please let me know if you have any questions.



Leslie E. Holden
Decommissioning

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From: Grange, Briana <Briana.Grange@nrc.gov>
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Cc: Snyder, Amy <Amy.Snyder@nrc.gov>; Stalker, Allison C:(GenCo-Nuc) <[Allison.Stalker@exeloncorp.com](mailto>Allison.Stalker@exeloncorp.com)>; O'Brien, Edwin:(GenCo-Nuc) <Edwin.OBrien@exeloncorp.com>
Subject: [EXTERNAL] FW: Oyster Creek ESA Consultation: Information Requests from NMFS

Leslie,

For your awareness and as we discussed during the 1:30pm status meeting today, attached is what I sent to Allison and Ed earlier today regarding the endangered species consultation with the National Marine Fisheries Service. Thanks,

Briana

Briana A. Grange

Conservation Biologist

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From: Grange, Briana

Sent: Tuesday, May 28, 2019 11:22 AM

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Cc: O'Brien, Edwin:(GenCo-Nuc) <Edwin.OBrien@exeloncorp.com>

Subject: Oyster Creek ESA Consultation: Information Requests from NMFS

Allison,

Thanks for speaking with me this morning. I've attached the National Marine Fisheries Service's information requests related to the reinitiated Endangered Species Act Consultation for Oyster Creek. As we discussed, I will need Exelon's input on two of the questions (1 and 3) to be able to complete NRC's responses. Question 2 is a regulatory process question, so I do not need Exelon's input on that one. For your awareness, the attached document will also be publicly available in ADAMS later this week at ML19148A439.

Thank you,

Briana

Briana A. Grange

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