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Dalwyn R. Davidson
VICE PRESIDENT
SYSTEM ENGINEERING AND CONSTRUCTION

July 7, 1980

Director of Nuclear Reactor Regulation
Attention: Mr. A. Schwencer, Chief
Licensing Branch 2
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Re: Perry Nuclear Power Plant
Docket Nos. 50-440 & 50-441
Construction Permit Nos.
CPPR-148 and CPPR-149
Environmental Monitoring Program

Dear Mr. Schwencer:

The Cleveland Electric Illuminating Company plans to make the following changes in the Environmental Monitoring Program during construction of the two unit Perry Nuclear Power Plant:

1. Reduce the frequency of lake water sampling and analysis from monthly to quarterly.

2. Eliminate the quarterly collection of benthic samples.

3. Alter the scope of the cranefly orchid surveillance program from quantitative to qualitative monitoring these plant populations.

4. Terminate the raptor program following the 1980 breeding season.

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The rationale for these changes are addressed in the attached recommendations from our environmental consultant, the NUS Corporation.

Very truly yours,

Dalwyn R. Davidson

Dalwyn R. Davidson
Vice President
System Engineering and Construction

Enclosures (2)

cc: Mr. James G. Keppler
Region III Office of Inspection
and Enforcement
U. S. Nuclear Regulatory Commission
Glen Ellyn, IL 60137

NUS CORPORATION
ENVIRONMENTAL SYSTEMS GROUP
4 RESEARCH PLACE
ROCKVILLE, MARYLAND 20850
301 948-7010

February 20, 1980
ESG-80-54
PY/NUS-CEI-301

Mr. Carl Banks
The Cleveland Electric
Illuminating Company
10 Center Road
North Perry, Ohio 44081

Dear Carl:

The terrestrial ecology construction monitoring program was discussed at our meeting in Rockville on January 23, 1980, we suggested that this program should be reduced in scope and that the NRC be informed of the reduction.

The current construction monitoring program consists of three separate programs: (1) cranefly orchid, (2) raptors, and (3) vegetation. Because we have shown no statistical differences between years, it is concluded that construction has had no effect on the cranefly orchid populations; therefore, we recommend that this program be terminated. As part of a limited surveillance effort in conjunction with vegetation monitoring, we can continued to qualitatively monitor the orchid populations and detect deliterious changes should they occur.

The raptor program should be continued through the 1980 breeding season and then terminated. This would hopefully refute or substantiate a correlation between a declining screech owl population and severe winters.

The vegetation monitoing program consists of annually photographing the site with color infrared film in late summer. Combined with ground reconnaissance, this is a means by which to detect vegetative stress and it also provides a permanent record of natural succession/land use conditions. We recommend that this program be continued until the preoperational monitoring program is initiated.

If there are any questions relative to these tasks please let me know.

Sincerely,

Rodney J. Davis
Project Manager

cc: CEI/NED
G. Friday
R. Pellek

NUS CORPORATION
NORTHERN ENVIRONMENTAL SERVICES DIVISION
4 RESEARCH PLACE
ROCKVILLE, MARYLAND 20850
301/948-7010

March 19, 1980
ESG-80-79
PY-NUS/CEI-306

Mr. Carl Banks
The Cleveland Electric
Illuminating Company
10 Center Road
North Perry, Ohio 44081

Dear Carl:

The aquatic ecology construction monitoring program was discussed at our meeting in Rockville on January 23, 1980 and in your letter of February 15, 1980. It is suggested that this program be reduced in scope and that the NRC be informed of the reduction.

CEI initiated construction at Perry late in October 1974 and initiated construction monitoring in November 1974. The monitoring program was submitted to NRC (then AEC). The general thrust of the monitoring program was to study those water parameters which would indicate deviations from ambient and, if there was unnecessary stress brought about by plant construction, to identify it early enough to allow corrective action to be taken.

Since 1974 to the present the PNPP construction monitoring program included the following physical, chemical and biological parameters:

1) Monthly pH, temperature, dissolved oxygen, total solids, dissolved solids, suspended solids, turbidity, oil and grease, BOD, nitrates, phosphates and bacteria.

2) Spring, summer and fall benthic macroinvertebrates.

All samples are collected at stations 1, 5 and 9. During barge slip construction and dredging, the sampling frequency was increased to weekly. Monthly status reports of the water analysis were submitted to CEI in support of their overall monitoring programs.

During the five year monitoring program at the PNPP only slight deviations from ambient water quality were detected. Elevated levels of suspended solids and turbidity in the water column was observed during periods of surface run-off and construction and dredging of the barge slip. These slight deviations from the norm were very localized and temporary, and further, were to be expected. No significant impact would be expected from these slight changes. Occasionally, elevated levels of fecal coliform and streptococcus appeared from time to time, but these too, were localized and temporary. In all cases, the water column returned to ambient within a month. CEI is to be commended for its realistic attempt to minimize construction impacts to the lake during a period of major construction activities.

In view of the fact that five years of construction monitoring data has indicated no significant construction impacts, and further, that sufficient data has been collected at the site since 1971, we concur with CEI that a reduction in the monitoring program is in order at this time. Therefore, we recommend that quarterly benthic sampling be dropped and monthly physical and chemical parameters be reduced to quarterly. These recommendations should remain in affect until the preoperational monitoring phase; at which, time appropriate changes in aquatic monitoring of the lake will be considered.

Sincerely,

Rodney J. Davis
Project Manager

cc: CEI/NED
D. Cafaro