

ATTACHMENT B

Aquatic issues identified in items 1 and 2 above are addressed by the effluent limitations, monitoring requirements and the Section 316(b) demonstration requirement contained in the effective NPOES permit issued by the Illinois Environmental Protection Agency. The NRC will rely on this agency for regulation of these matters as they involve water quality and aquatic biota. The aquatic issue identified in item 3 above has been addressed in correspondence between the NRC and the State of Illinois. The State has been appraised of the intention of the NRC not to include this monitoring and mitigation requirement in this facility license. The NRC will rely on the State of Illinois for the establishment and conduct of this program. This action has been taken in accordance with Section 511(c)(2) of the Clean Water Act which places responsibility for establishment and enforcement of programs for the protection of the aquatic environment with the U.S. Environmental Protection Agency or state(s) granted authority for such programs under the Act.

2.2 Terrestrial Issues

- (1) Potential increase in fogging and icing associated with operation of the cooling system involving the cooling lake (FES-OL Section 5.4.1).
- (2) Potential erosion effects along the dike around the cooling lake and the banks of Armstrong Run.

NRC requirements with regard to the terrestrial issues are specified in Subsection 4.2 of this EPP.

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A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns (1) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the final environmental statement (FES) as modified by staff's testimony to the Atomic Safety and Licensing Board, supplements to the FES, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or (2) a significant change in effluents or power level (in accordance with 10 CFR Part 51.5(b)(2)) or (3) a matter not previously reviewed and evaluated in the documents specified in (1) of this Subsection, which may have a significant adverse environmental impact.

The licensee shall maintain records of changes in plant design or operation and of tests and experiments carried out pursuant to this Subsection. These records shall include a written evaluation which provide bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question nor constitute a decrease in the effectiveness of this EPP to meet the objectives specified in Section 1.0. The licensee shall include as part of his Annual Environmental Operating Report (per Subsection 5.4.1) brief descriptions, analyses, interpretations, and evaluations of such changes, tests and experiments.

3.2 Reporting Related to the NPOES Permits and State Certification

Violations of the NPOES permit or the State certification (pursuant to Section 401 of the Clean Water Act, respectively) shall be reported to the NRC by submittal of copies of the reports required by the NPOES permit or certification. The licensee shall also provide the NRC with copies of the results of

The monitoring program consists of a visual inspection of the vegetative integrity on the outer face of the peripheral cooling pond dike at the beginning of the spring planting season (May) and at the beginning of the fall planting season (August). If a failure of the vegetative cover is discovered by inspection, the affected area shall be reseeded during the succeeding planting season.

4.2.2 Monitoring of Fog and Ice Due to the Cooling Pond

The results of this monitoring program will be to determine (1) the frequency and density of cooling pond-induced fog on local roads; and (2) the extent of rime ice formation in the vicinity of the pond and to determine whether there is a need for action to mitigate fog or icing effects.

In connection with the training phase described below, locations will be established from and at which observations will be made for occurrence of fog and ice. Observation locations will be chosen to include appropriate sightings of the roadways near the periphery of the cooling pond, nearby residences, and other sensitive locations, if any. Specific roadways to be observed near the cooling pond are County Highway 6, State Route 170, the gravel road north of the cooling pond, and County Highway 30.

The observations will be made by company personnel trained to observe and report steam fogging and rime ice conditions near the periphery of the cooling pond under the auspices of a Certified Consulting Meteorologist.

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Monitoring shall commence as soon as practical after January 1, 1980, so as to obtain as much of one year's preoperational data as possible. Observations made during one-unit and two-unit operation will be in accordance with the schedule expressed in paragraph six of Subsection 6.2.1 of the LSCNPP Final Environmental Statement (FES). The monitoring data will be summarized and submitted to the NRC quarterly. These data shall be summarized, analyzed, interpreted and compared with the preoperational monitoring data in the annual environmental reports.

As an aid to observations, appropriate landmarks will be identified within sight of each observation location to facilitate the estimation of the extent of (distance covered by) fogging and rime icing and the density of (visibility impairment caused by) fogging. The distances between the landmarks and their associated observation locations will be measured and recorded.

(a) Fog

From each observation location, visual observations will be made and recorded by trained personnel twice each week, before and after the day shift, except weekends and holidays, indicating the presence, location and extent of fog and the estimated local visibility (range). These observations will not be made on days these roads are impassable due to snow or flood.

(b) Ice

From each observation location, visual observations will be made and recorded by trained personnel twice each day, before and after the day shift, except weekends and holidays, from October 1 through March 31, indicating the presence, location, extent and thickness of rime ice. These observations will not be made on days these roads are impassable due to snow or flood.

(c) Supporting Observations

The observations record shall include time, ambient air temperature (dry bulb and dew point), wind direction and speed, electrical load on plant and condensing water temperatures (intake to and discharge from the plant).

(d) Environmental Impact of Rime Icing

As soon as possible after the end of the observation season, but no later than May 1, the data on the occurrence of rime icing will be correlated to determine the locations where environmental impact surveys will be conducted. Such surveys will include observation of vegetation by a terrestrial biologist or botanist during the spring growing season.

ATTACHMENT C

SIGNIFICANT HAZARDS CONSIDERATION

Commonwealth Edison has evaluated the proposed Technical Specification Amendment and determined that it does not represent a significant hazards consideration. Based on the criteria for defining a significant hazards consideration established in 10CFR50.92, operation of LaSalle County Station Units 1 and 2 in accordance with the proposed amendment will not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated or create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed amendment merely 1) removes redundant reporting requirements with regards to the NPDES permit administered by the Illinois EPA, and 2) Removes the requirement to perform fog and ice monitoring which is no longer necessary.

- 2) Involve a significant reduction in the margin of safety because this change does not effect any permit limit.

Based on the preceding discussion, it is concluded that the proposed system change clearly falls within all acceptable criteria with respect to the system or component, the consequences of previously evaluated accidents will not be increased and the margin of safety will not be decreased. Therefore, based on the guidance provided in the Federal Register and the criteria established in 10 CFR 50.92(e), the proposed change does not constitute a significant hazards consideration.