



January 22, 2021

PBNDNR-21-0004

Jason Knutson
WI Department of Natural Resources Division of Environmental Management
DNR Central Office
P.O. Box 7921
Madison, WI 53707-7921

RE: NextEra Energy Point Beach – Point Beach Nuclear Plant - Units 1 and 2 Subsequent License Renewal

Dear Mr. Knutson:

NextEra Energy Point Beach, LLC (NEPB) has submitted an application to renew the facility operating licenses for Point Beach Nuclear Plant Units 1 and 2 (PBN) for an additional 20 years (see Table 1). The application is available on the U.S. Nuclear Regulatory Commission (NRC) website at <https://www.nrc.gov/docs/ML2032/ML20329A292.html>. As part of the license renewal process, the NRC may consult your agency concerning the Clean Water Act (CWA) Section 401 Water Quality Certification.

It is our intent by this letter to introduce you to the project, to make available any data you need to ensure an efficient and effective consultation process, and to request the following:

Confirmation from you that a waiver to the 401 Water Quality Certification requirement applicable to PBN’s license renewal is provided by Wis. Adm. Code NR 299.01 (2)(c) given that PBN holds WPDES permits granted under the permit authority of Wis. Adm. Code NR 283.

NEPB previously contacted DNR via email on June 22, 2020 to confirm the applicability of the waiver in light of EPA’s recently finalized CWA Section 401 Certification Rule. DNR responded via email on June 23, 2020 that, the waiver for PBN would still apply, since the rule would not impact Wisconsin’s ability to waive certification for facilities that have WPDES permits.

Table 1. PBN Licensing Dates

PBN Unit	License Expiration Date	Extended License Expiration Date
Unit 1	October 5, 2030	October 5, 2050
Unit 2	March 8, 2033	March 8, 2053

As part of the renewal process, the NRC requires that the license renewal application include an environmental report (ER) that assesses the impacts from continued operation and any refurbishment undertaken to enable the continued operation of the units. Figures depicting the plant site and the vicinity within a 6-mile radius of the plant are enclosed, and a brief discussion of the plant and its operations during the extended period of operation is provided below.

PBN is located on the western shore of Lake Michigan in Manitowoc County, WI, approximately 15 miles north-northeast of Manitowoc, WI. In accordance with NRC regulations, transmission lines within the scope of the license renewal are those located within the PBN site boundary. During the license renewal term, NEPB proposes to continue operating the units as currently operated and based on aging management studies does not expect that refurbishment, construction, ground disturbing activities or physical changes will be needed for the license renewal. NEPB does not anticipate operation of PBN to adversely affect the environment or any cultural or historic resources.

PBN operates under WPDES Permit No. WI-0000957-08-0 with water intake from and wastewater discharges to Lake Michigan. The permit expires June 30, 2021 and NEPB submitted a renewal application as required. The permit authorizes two discharges for wastewater consisting of non-contact cooling water, treated sanitary wastewater, process wastewater, wastewater from water treatment processes, and boiler blowdown through Outfalls 001 and 002. Chemical additives approved by DNR are used to control pH, scale, and corrosion in the circulating water system, and to control biofouling of plant equipment. The wastewater effluent for Outfalls 001 and 002 exit the plant via two steel piling troughs extending in opposite directions (30-degree angle from the plant centerline) approximately 200 feet out into Lake Michigan. The momentum of the discharge velocity is sufficient to create a high degree of mixing with the lake surface water in the immediate vicinity. A third outfall, Outfall 004, is permitted for deicing the cooling water intake system and consists of a reversal of an intake flow. Wastewaters are monitored in accordance with the WPDES permit.

Stormwater discharges associated with PBN industrial activities are regulated and controlled through WPDES Permit No. WI-S067857-4. PBN also maintains and implements a Stormwater Pollution Prevention Plan that identifies potential sources of pollution, such as erosion, that would reasonably be expected to affect the quality of stormwater and identifies best management practices used to prevent or reduce the pollutants in stormwater discharges.

As stated earlier, this letter seeks your confirmation that (1) Wis. Adm. Code NR 299.01 (2)(c) provides a waiver to the CWA Section 401 Water Quality Certification requirement given that PBN's discharges are regulated by WPDES permits and (2) this waiver is applicable to continued discharge of wastewaters regulated by WPDES permits during a subsequent license term granted by NRC's renewal of PBN's federal operating licenses. We appreciate your notifying us as soon as possible of any concerns regarding our understanding of the applicability of the waiver provided by Wis. Adm. Code NR 299.01 (2)(c). In the absence of concerns on the applicability of the waiver to the PBN license renewal, NEPB kindly requests DNR respond to NEPB within 45 days of receiving this letter confirming our understanding of waiver applicability.

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Should you or your staff have any questions or comments, please contact William Maher at (561)
691-2294 / William.Maher@fpl.com.

Sincerely,



William D. Maher
Senior Licensing Director

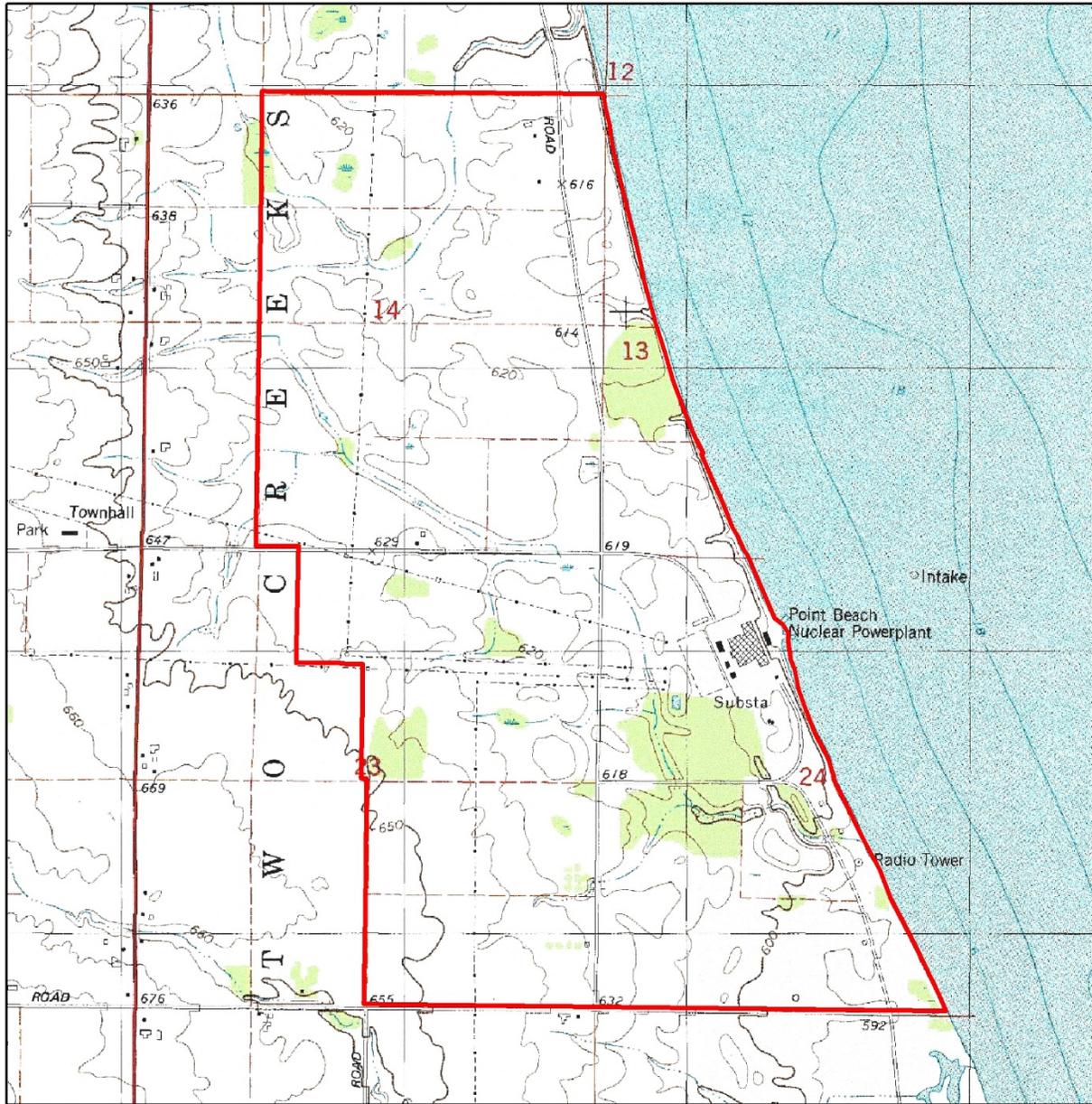
cc: Phyllis Clark, Project Manager, Point Beach Nuclear Plant, USNRC

Attachments:

Figure 1. PBN Site

Figure 2. PBN 6-mile Vicinity

Figure 1. PBN Site



Legend

 Site Boundary



 Miles
0 0.25 0.5

Figure 2. PBN 6-mile Vicinity

