

From: Kowal, Kathleen <kowal.kathleen@epa.gov>
Sent: Wednesday, July 2, 2025 9:27 AM
To: Angela Sabet
Subject: [External_Sender] NUREG-1437, Supplement 17, Second Renewal, Draft - Dresden Re-Licensing DSEIS
Attachments: USEPA Comments - Dresden Re-Licensing DSEIS.pdf

Greetings,

Attached please find USEPA's comment letter regarding the above-mentioned project. Please do not hesitate to contact me if you have any questions or comments.

Please send electronic copies of future NEPA documents pertaining to this project to R5NEPA@epa.gov.

Thank you,
Kathy

Kathy Kowal
NEPA Reviewer
US EPA, Region 5
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Chicago, IL 60604
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REGION 5

CHICAGO, IL 60604

July 2, 2025

VIA ELECTRONIC MAIL ONLY

Ms. Angela Sabet
U.S. Nuclear Regulatory Commission
Office of Nuclear Material Safety and Safeguards
1555 Rockville Pike
Rockville, Maryland 20852-2738

Re: EPA Comments: Draft Generic Environmental Impact Statement for License Renewal of Nuclear Plants; Supplement 17 Second Regarding License Renewal for Dresden Nuclear Power Station, Units 2 and 3, Draft Report for Comment (NUREG-1437); Morris, Grundy and Will Counties, Illinois; CEQ No. 20250066

Dear Ms. Sabet:

The U.S. Environmental Protection Agency has reviewed the Draft Supplemental Environmental Impact Statement (Draft SEIS) dated May 2025, concerning the license renewal (LR) of Dresden Nuclear Power Station (Dresden), Units 2 and 3 in Morris, Illinois. This letter provides EPA's comments on the proposed action pursuant to NEPA and EPA's NEPA review authority under Section 309 of the Clean Air Act.

Dresden includes two operating boiling water reactors¹ that produce 2,957 megawatts thermal each.² NRC issued the provisional operating license for Unit 2 December 1969 and commercial operation began June 1970. NRC subsequently renewed the license for Unit 2 in October 2004, extending the expiration date to December 2029. NRC issued the original facility operating license for Unit 3 January 1971 and commercial operation began November 1971. NRC subsequently renewed the license for Unit 3 in October 2004, extending the expiration date to January 2031.

Constellation Energy Generation (Applicant) applied to NRC for a LR for Units 2 and 3. The application for LR seeks to extend the current facility operating licenses for an additional 20 years of operation, expiring in 2049 (Unit 2) and 2051 (Unit 3). Plant operation activities during the LR term would be the same as, or similar to, those occurring during the current license term. The Applicant has not identified

¹ Unit 1 operated from 1960 to 1978 and was retired in 1984.

² Units 2 and 3 were originally licensed with reactor core thermal power of each unit rated at 2,527 MWt. NRC approved an extended power update in 2001 to increase the maximum reactor core power level of each unit to 2,957 MWt.

any LR-related refurbishment or replacement actions needed to maintain the functionality of systems, structures, and components, consistent with the current licensing basis, during the proposed LR term.

The Draft SEIS evaluates the environmental impacts of the proposed action, a no-action alternative, and replacement power alternatives comprised of a natural gas alternative³ and a renewable and natural gas combination alternative.⁴ NRC staff's preliminary recommendation is to renew the operating licenses for Units 2 and 3.

After reviewing the Draft SEIS and appendices, EPA has no substantive comments to offer. Please send an electronic copy of future NEPA documents to R5NEPA@epa.gov. If you have questions or would like to discuss the contents of this letter further, please contact lead NEPA reviewer, Kathy Kowal, at kowal.kathleen@epa.gov.

Sincerely,

Krystle Z. McClain, P.E.
NEPA Program Supervisor
EPA Region 5

³ Construction of a natural gas combined cycle power plant

⁴ Construction of a natural gas combined cycle plant, on-site and off-site solar energy and wind energy installation combination