



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

May 21, 2026

Christopher D. Wilson  
Director, License Renewal  
Constellation Energy Generation, LLC  
200 Energy Way  
Kennett Square, PA 19348

SUBJECT: NINE MILE POINT NUCLEAR STATION, UNIT 1 – LICENSE RENEWAL  
REGULATORY AUDIT REGARDING THE ENVIRONMENTAL REVIEW OF THE  
SUBSEQUENT LICENSE RENEWAL APPLICATION (EPID NUMBER: L-2026-  
SLE-0000) (DOCKET NUMBER: 50-220)

Dear Christopher D. Wilson

By letter dated March 25, 2026, (Agencywide Documents Access and Management System Accession No. ML26084A179–package), Constellation Energy Generation, LLC, submitted to the U.S. Nuclear Regulatory Commission (NRC) an application for subsequent license renewal of Renewed Facility Operating License No. DPR-63 for Nine Mile Point Nuclear Station, Unit 1 (NMP1) pursuant to Section 103 of the Atomic Energy Act of 1954, as amended, and Part 54 of Title 10 of the *Code of Federal Regulations*, “Requirements for renewal of operating licenses for nuclear power plants.”

The NRC staff has initiated the environmental review for the application. A virtual environmental audit will be conducted the week of June 22, 2026, by NRC staff.

To the extent possible, the NRC staff requests the information identified in the Environmental Audit Needs List (Enclosure) be made available on the NMP1 online reference portal one week prior to the audit.

If you have any questions, please contact me via email at [Ashley.Waldron@nrc.gov](mailto:Ashley.Waldron@nrc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Ashley N. Waldron".

Signed by Waldron, Ashley  
on 05/21/26

Ashley N. Waldron, Project Manager  
Environmental Project Management Branch 1  
Division of Rulemaking, Environmental,  
and Financial Support  
Office of Nuclear Material Safety  
and Safeguards

Docket No. 50-220

Enclosure: As stated

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DATED: May 21, 2026

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JShussler, RI/DORS

SHaney, RI/DORS

DTiftt, RI, ORA

[Christopher.Wilson2@constellation.com](mailto:Christopher.Wilson2@constellation.com)

[Kristin.Meek@constellation.com](mailto:Kristin.Meek@constellation.com)

[Rebecca.Craddick@constellation.com](mailto:Rebecca.Craddick@constellation.com)

**ADAMS Package No: ML26134A224; Letter: ML26134A235**

**e-Concurrence case: 20260514-80008**

**Subsequent License Renewal Environmental Review  
Nine Mile Point Nuclear Station Unit 1**

**Audit Plan**

**May 2026**

## **Subsequent License Renewal Environmental Review Nine Mile Point Nuclear Station Unit 1**

### **1. Background**

By letter dated March 25, 2026 (Agencywide Documents Access and Management System Accession No. ML26084A180), Constellation Energy Generation, LLC (CEG, the applicant), submitted to the U.S. Nuclear Regulatory Commission (NRC) an application for subsequent license renewal of Renewed Facility Operating License DPR-63 for Nine Mile Point Nuclear Station, Unit 1 (NMP1). A *Federal Register (FR)* Notice (91 FR 20183) dated April 15, 2026, noted the receipt and availability of the application, including the environmental report (ER); as well as *FR* Notice (91 FR 23122) accepting the application for docketing.

The NRC staff is conducting an environmental audit of the site to improve understanding, to verify information, and to identify information for docketing to support the preparation of an environmental assessment (EA). Specifically, the NRC staff will be identifying pertinent environmental data, reviewing the facility, and seeking clarifications regarding information provided in the ER.

### **2. Environmental Audit Bases**

License renewal requirements for environmental reports are specified in Title 10 of the *Code of Federal Regulations* (10 CFR) Part 51, "Postconstruction environmental reports." As specified by 10 CFR 51.53(c): *Operating license renewal stage*, "(1) Each applicant for renewal of a license to operate a nuclear power plant under Part 54 of this chapter shall submit with its application a separate document entitled "Applicant's Environmental Report—Operating License Renewal Stage." Review guidance for the staff is provided in NUREG-1555, Supplement 1, Revision 2, "Standard Review Plans for Environmental Reviews for Nuclear Power Plants - Supplement 1: Operating License Renewal."

### **3. Environmental Audit Scope**

The scope of this environmental audit is to identify new and significant issues and issues which can be eliminated from further study. The NRC staff will also identify environmental resources that must be described and evaluated in the EA. Audit team members will review the documents and other requested information made available on the NMP1 online reference portal identified on the environmental audit needs list (Enclosure) and discuss any questions and additional information needs with the applicant's subject matter experts.

### **4. Information and Other Material Necessary for the Environmental Audit**

As identified on the environmental audit needs list.

### **5. Environmental Audit Team Members and Resource Assignments**

The environmental audit team members and their assignments are shown in the table below.

<b>Discipline</b>	<b>Team Members (NRC)</b>
Environmental Review Supervisor	Steve Koenick
Environmental Project Manager	Ashley Waldron
Air Quality	Nancy Martinez
Aquatic Resources	Shannon Healy
Federally Protected Ecological Resources	Mitchell Dehmer
Geologic Environment	Gerry Stirewalt
Greenhouse Gases/Climate Change	Nancy Martinez
Groundwater (Hydrology and Hydrogeology)	Gerry Stirewalt
Historic and Cultural Resources	Beau Goldstein
Human Health	Jeffrey Rikhoff
Land Use and Visual Resources	Jeffrey Rikhoff
Meteorology and Climatology	Nancy Martinez
Noise	Nancy Martinez
Postulated Accidents	Jeffrey Rikhoff
Replacement Power Alternatives	Bradley Werling
Socioeconomics	Jeffrey Rikhoff
Spent Nuclear Fuel	Jeffrey Rikhoff
Surface Water	Kevin Folk
Termination of Operations and Decommissioning	Jeffrey Rikhoff
Terrestrial (Land Cover and Habitat)	Mitchell Dehmer
Uranium Fuel Cycle	Jeffrey Rikhoff
Waste Management (Rad and Non-Rad)	Jeffrey Rikhoff

## **6. Logistics**

An environmental audit will be conducted by the NRC staff virtually the week of June 22, 2026. An entrance meeting will be held at the beginning of the environmental audit and an exit meeting will be held following the conclusion of the audit.

## **7. Special Requests**

CEG staff and contractors who are subject matter experts in the disciplines identified on the environmental audit needs list should be available for interviews.

## **8. Deliverables**

An audit summary report will be issued by the NRC staff within 30 days from the end of the environmental audit.

**Audit Tours and Information Needs  
Nine Mile Point Nuclear Station, Unit 1**

Described below in three categories (i.e., virtual tours, meetings, and information needs) are the information needs of the U.S. Nuclear Regulatory Commission (NRC) staff, supported by Pacific Northwest National Laboratory (PNNL), for Nine Mile Point Nuclear Station, Unit 1 (NMP1). Please arrange for the (virtual) tours and meetings specified below to occur during the virtual environmental audit as noted. Additionally, we ask that you provide responses to the information needs on the electronic portal and make subject matter experts available to discuss these items with the NRC staff.

**Virtual Tours**

Please arrange for, and provide appropriate subject matter experts to contribute to, the following virtual tours. For the virtual tours, please provide photographs, diagrams, location maps, and/or callouts for specific components that would be of interest for the features noted.

<b>Number and Title</b>	<b>Features Observed</b>
1. General site	Virtual walk-through of the following via photographs and/or diagrams: <ul style="list-style-type: none"> <li>• Exterior grounds</li> <li>• Transmission lines</li> <li>• Plant views from publicly accessible areas</li> <li>• Independent Spent Fuel Storage Installation (ISFSI)</li> <li>• Historic and cultural sites</li> <li>• Pollinator Program areas</li> <li>• Rock dike that protects the NMP1 from shoreline erosion</li> </ul>
2. Plant intake and discharge	Virtual walk-through of the following via photographs and/or diagrams: <ul style="list-style-type: none"> <li>• Cooling Water Intake System system pathway from intake to discharge</li> <li>• Representative circulating water system and service water system pumps</li> <li>• Intake surrounding area views</li> <li>• Intake inlet, tunnel and screenhouse</li> <li>• Screenhouse substructure including racks, rakes, and traveling screens</li> <li>• Discharge tunnel and outlet</li> <li>• Discharge surrounding area view</li> <li>• Site drainage system and revetment ditch system</li> </ul>
3. Groundwater Resources	Virtual walk-through of the following via photographs and/or diagrams: <ul style="list-style-type: none"> <li>• The site drainage system with the primary purpose of gravity draining any low areas on the site of groundwater (and stormwater runoff from precipitation)</li> <li>• Physical location of Monitoring Well MW-11 that is the intersection point of hydrogeologic cross-sections A-A' and B-B', if possible</li> </ul>

## Meetings

Please be prepared to schedule breakout meetings with the appropriate subject matter expert(s) and/or contractor(s) concerning the following topics. Those in attendance should be prepared to discuss the corresponding questions as described in the “Information Needs and Document Requests” section below. The staff intends to use these breakout meetings, as needed, to resolve or clarify any outstanding data needs or questions arising from the environmental audit. The NRC intends to leverage virtual breakouts to the extent possible. No in-person breakouts are needed at this time.

- General Topics
- Air Quality
- Noise
- Surface Water Resources
- Groundwater Resources
- Ecological Resources (Terrestrial and Aquatic)
- Historic and Cultural Resources
- Human Health
- Waste Management
- Spent Nuclear Fuel Cycle
- Greenhouse Gas and Climate Change

## Information Needs and Document Requests

Information needs and document requests are identified below by topic.

### General (All)

The following requests are generic to more than one environmental resource area. Issues applicable to these questions are provided below along with the responsible NRC and PNNL subject matter expert, as appropriate.

- GEN-1** Please provide any relevant updates to Table 9.1-1 in the Environmental Report. If any authorizations have expired since Constellation Energy Corporation (CEG) Application for Subsequent Renewed Operating License, dated March 25, 2026, please provide the status of those permits and/or renewals.
- GEN-2** Please provide documentation of CEG’s new and significant information review and results identified in Section 5 of the environmental report (ER) that supports the finding that no new and significant information was identified for Category 1 issues regarding the environmental impacts of the subsequent license renewal (SLR) associated with NMP1.

## Topic-specific

The following requests are specific to a single environmental review area. If a topic is not provided below, the discussions held in response to the generic requests above are expected to fully cover that topic.

### **Air Quality** (Nancy Martinez, NRC)

#### *Audit Needs*

**AQ-1** Table 3.3-9 of the ER presents NMP1 temporary emission unit runtimes in days. Clarify if runtimes are continuous or intermittent.

### **Noise** (Nancy Martinez, NRC)

#### *Audit Needs*

**NOI-1** Section 3.4 of the ER identifies that there have been “no noise complaints at NMP1 in 2020-2024”:

- With respect to this statement, clarify if this is referring to no noise complaints from onsite personnel, offsite nearby noise sensitive receptors, or both.
- Have there been any noise complaints from nearby noise sensitive receptors (residents, etc.) since 2024?

**NOI-2** Section 3.4 of the ER states that a noise survey was conducted in October and November 2007 at NMP1 and sound levels were measured continuously at six locations (one location near NMP1 Units 1 and 2 and five offsite locations). The ER states that the 24-hour daily sound levels ranged from 57 dBA to 65 dBA. Clarify if these sound levels are for five offsite locations.

#### *Document Needs*

**NOI-3** Copy of the leaf-off noise survey conducted in October and November 2007

**NOI-4** Copy of the leaf-on 2008 noise survey.

### **Water Resources - Surface Water** (Kevin Folk, NRC)

#### *Audit Needs*

**SW-1** Clarify whether the site drainage system described in Section 3.6.1.2.2 of the ER is the same as the revetment ditch described in Section 3.6.1.1 for Unit 1.

**SW-2** As referenced in Section 9.4.3.2 of the ER, provide a status update on the expected issuance of renewed State Pollutant Discharge Elimination System (SPDES) Permit No. NY0001015.

**SW-3** Given the discussion in Section 3.6.1.2.4 of the ER, clarify whether CEG anticipates conducting any maintenance dredging, inclusive of the intake and discharge

structure or lakeshore discharge/outfalls, in the future and at what frequency. In addition, clarify whether the work described in Section 3.6.1.2.4 was completed and when. Further, describe what onshore or nearshore maintenance and erosion control activities CEG is requesting be included in the renewed SPDES permit that were previously the subject of Great Lakes Erosion Control Permit GP-0-20-004 (see discussion of dredging procedure in Section 3.7.2.4.4 and 3.7.2.5).

#### *Document Needs*

**SW-4** Stormwater Control Plan

**SW-5** Water Supply - Water Withdrawal Registration (Permit ID 7-3556-00013/00033)

Water Resources - Groundwater Resources (Gerry Stirewalt, NRC)

#### *Audit Needs*

**GW-1** Regarding hydrogeologic cross-sections A-A' and B-B' (ER Figures 3.5-3b and 3.5-3c) that inform the discussion on Groundwater Resources, the legend indicates unconsolidated overburden is made up of fill and (glacial) till while the figures label the overburden as only fill. ER Section 3.5.2 indicates overburden was excavated to top of bedrock (Oswego Sandstone) and replaced with engineered fill during construction of the NMP1. Please clarify whether the unconsolidated overburden materials across both cross-sections include till deposits as well as fill.

**GW-2** ER Section 3.6.2.1 states that the upper (shallow) primary aquifer near the NMP1 is composed of unconsolidated fill, till, and the upper weathered and fractured portion of the Oswego Sandstone. There is no distinction in the legend for the upper weathered and fractured portion of the Oswego Sandstone. However, in cross-section B-B', the bedrock groundwater surface extends into fill/till. Please clarify whether this graphically represents the upper weathered and fractured portion of the Oswego Sandstone that is considered to be part of the upper (shallow) primary aquifer.

**GW-3** ER Section 3.6.2.1 also states that three confined aquifers in Pulaski Formation bedrock underlying the Oswego Formation and the station are characterized by artesian pressure and recharged from upgradient outcrops and through fractures. Hydrogeologic cross-section A-A' and B-B' show groundwater flow pathways in the Pulaski Formation seemingly influenced by drawdown related to dewatering at Units 1 and 2, and flow from the Pulaski through the Oswego is suggested in cross-section B-B'. Please clarify whether artesian groundwater flow in the Pulaski recharges the overlying Oswego Formation and, if so, how does that situation affect groundwater flow in the Oswego. If Pulaski artesian flow does not recharge the Oswego, please clarify the general groundwater flow pathways in the Pulaski Formation if possible.

**GW-4** Well MW-11 defines the bedrock groundwater surface at 242.90 ft elevation where cross-sections A-A' and B-B' intersect. The bedrock groundwater surface is shown as below fill/till in A-A' while above the fill/till in cross-section B-B' at that intersection point as stated in GW-2. Please clarify why it is not shown as above the fill/till in both cross-sections at that intersection point.

- GW-5** ER Section 3.6.2.3 discusses potentiometric surfaces of the unconfined aquifer and the bedrock aquifer based on elevations measured in 2021. The information collected indicates groundwater flow from southwest to northeast toward Lake Ontario with significant drawdown in the bedrock aquifer due to the Unit 1 and Unit 2 dewatering systems. Please confirm that no post-2021 data indicate any differences from information based on the 2021 measurements.
- GW-6** ER Section 3.6.1.2.2 states that the site drainage system has the primary purpose of gravity draining any low areas on the site of groundwater (as well as stormwater runoff from precipitation). Please clarify how effective this man-made ditch is for gravity draining of low areas on the site of groundwater and whether the upper aquifer is the only aquifer that would be affected.

### **Terrestrial Resources** (Mitchell Dehmer, NRC)

#### *Audit Needs*

- TER-1** Provide details regarding where herbicides, pesticides, and mowing are used/conducted on site as well as the method, location, purpose, and frequency of use.
- TER-2** Per ER Section 3.7.1.4.1, show current pollinator area locations on a map, indicate their previous sites, explain what relocating the areas means, and note possible future locations for pollinator areas.
- TER-3** As described in ER Section 3.7.1.4.4 specify whether there have been any reported avian incidents within the last 10 years. If so, provide the following, if available: (1) a summary of bird mortalities or injuries (species, date, cause if known, associated structures, or buildings, if any) in chronological order; and (2) associated reports for each incident, if any.
- TER-5** Provide a description of the lighting regime (color of light, direction of light) for on-site lighting structures and any best management practices (BMPs) related to lighting for SLR (e.g., light usage at night, buffer zones, etc.).
- TER-6** Display the locations where American Common Reed is monitored. Briefly outline any control methods used for this species.
- TER-7** Are fens (medium) located onsite? If so, please show the location of the fen(s) on a map.
- TER-8** ER Section 3.7.1.3.1 mentions an eagle incident from June 2022. Please provide specific details about this event, indicate if U.S. Fish and Wildlife Service (FWS) was notified, and clarify whether CEG will continue raptor monitoring. Also, include a map showing the transmission road and general area of bald eagle nests onsite.

#### *Document Needs*

- TER-9** Provide copies of the following documents and/or procedures:
- Bald Eagle Nest Monitoring Program/Procedures (ER Section 3.7.1.3.1)

- Bat Monitoring Program/Procedures (ER Section 3.7.1.3.1)
- Phragmites Monitoring Program/Procedures (ER Section 3.7.1.3.1)
- Pollinator Garden/Honeybee Hive Program/Procedures (ER Section 3.7.1.4.1)
- Avian and Wildlife Management Procedure (ER Section 3.7.1.4.1)

### **Aquatic Resources** (Shannon Healy, NRC)

#### *Audit Needs*

- AQU-1** Please provide an update on current status of the SPDES permit renewal request and provide a copy of the draft permit or fact sheet, if available.
- AQU-2** Please provide records from the zebra mussel control program for past 5 years.
- AQU-3** Please provide a source for the data provided in Table 3.7-5.
- AQU-4** Per ER Section 3.6.1.2.4, there is no active dredging in Lake Ontario or along the shoreline and previously obtained permits related to dredging have expired. Please clarify what activities are expected to occur during the SLR term and what permits would be required.

#### *Document Needs*

- AQU-5** 2006-2007 Entrainment and Impingement Studies
- AQU-6** 2006 Fish Community Gill Net Survey
- AQU-7** 2008 Thermal Discharge Plume Characterization Study
- AQU-8** 2009 Near-Field and Far-Field Thermal Monitoring Studies
- AQU-9** 2010 Near-Field and Far-Field Thermal Monitoring Studies
- AQU-10** 2018 Closed-cycle Recirculating System Design and Construction Technology Review
- AQU-11** Procedures and Protocols:
- Oil spill prevention control and countermeasure plan
  - Stormwater control plan
  - Dredging procedure
  - BMP plan for industrial activities

### **Federally Protected Ecological Resources** (Mitchell Dehmer, NRC)

#### *Audit Needs*

- FPE-1** Are there any onsite records or sightings of the following species: northern long-eared bat (*Myotis septentrionalis*), bog buck moth (*Hemileuca maia meyanthevora*), buckbean (*Menyanthes trifoliata*), or monarch butterfly (*Danaus plexippus*)?

- FPE-2** As described in ER Section 3.7.1.3, does CEG plan to obtain recertification from Wildlife Habitat Council?
- FPE-3** Specify BMPs and avoidance and mitigation measures CEG plans or currently implements as related to conservation of federally listed species (i.e., speed limits, fugitive dust controls, noise, erosion, sedimentation, land clearing and earthmoving activities, demolition, lighting, etc.).
- FPE-4** Provide responses to the following FWS determination keys: (1) Northern Long-Eared Bat and Tricolored Bat Range-wide Determination Key, and (2) the Northeast Endangered Species Determination Key.
- FPE-5** As described in ER Section 3.7.1.3.1, show on a map where the two bat roosting boxes are located onsite.

*Document Needs*

- FPE-6** As described in ER Section 3.7.1.3.1, provide copies of the referenced baseline bat acoustic monitoring survey and the 2024 bat acoustic survey.

**Historic and Cultural Resources** (Beau Goldstein, NRC)

*Audit Needs*

- HCR-1** Are there any shipwrecks within the NMP1 site boundary that are covered by the Abandoned Shipwrecks Act?
- HCR-2** Clarify if there are any known historic or cultural resources within the Lake Ontario National Marine Sanctuary in the NMP1 site boundary; provide copies of any correspondence with National Oceanic and Atmospheric Administration (NOAA) on this subject (ER Section 3.7.3.3).
- HCR-3** Provide any updated coordination (incoming and outgoing) not already included in the ER with the New York State Historic Preservation Office and Tribes (ER Section 3.8.7 and Attachment C).

*Document Needs*

- HCR-4** Provide the three procedures referenced in ER Section 3.8.6 for NRC review: Environment Evaluations, Managing Environmental Issues and Commitments, and Environmental Commitment List.
- HCR-5** Provide the 2025 Archaeological Reconnaissance Survey report (ER Table 3.8-1).
- HCR-6** Provide the 2025 Archaeological History Survey (architectural) report (ER Table 3.8-1).

**Human Health** (Jeffrey Rikhoff, NRC)

*Audit Needs*

**HH-1** Please confirm that NMP1 complies with the National Electric Safety Code (NESC) clearance standards and the 5-milliampere threshold for induced shock consistent with Section 3.1.6 of the Generic Environmental Impact Statement.

**HH-2** Please update consultation status with the New York State Department of Health (NYSDH) regarding the potential existence and perceived public health risks associated with organisms that may be present in the portion of Lake Ontario that receives cooling water discharge from NMP1. Initial correspondence in ER Attachment D.

### **Spent Nuclear Fuel** (Jeffrey Rikhoff, NRC)

#### *Audit Needs*

**SNF-1** ER Section 2.2.1 states that the expansion of the NMP1 ISFSI pad was completed in late 2025 to provide additional cask storage. Please confirm that this would be sufficient for the subsequent license renewal period.

### **Waste Management** (Jeffrey Rikhoff, NRC)

#### *Audit Needs*

**WM-1** Please confirm no changes would occur during the subsequent license renewal period pertaining to radiological and non-radiological waste management practices, generated volumes, disposal methods and vendors used for off-site disposal of wastes.

### **Greenhouse Gas and Climate Change** (Nancy Martinez, NRC)

#### *Audit Needs*

**GHGCC-1** Table 3.13-1 provides NMP1 Direct Greenhouse Gas (GHG) emissions.

- Identify the equipment that uses CO<sub>2</sub>.
- Discuss the noted greater CO<sub>2</sub>eq values associated with ozone depleting chemicals refrigerants in 2021 relative to the other years presented.

**GHGCC-2** Section 3.13.2.1 of the ER states that the spike in the March 2023 intake water temperature displayed in Figures 3.13-1 and 3.13-2 was due to a plant outage; during this outage the circulating water system (CWS) was removed from service, causing the flow to stop, and the water temperature increased closer to ambient air temperatures while there was no water flow. Please discuss: (1) why this spike in temperature has not been observed during other plant outages that have taken place and (2) the relationship between the CWS and intake water temperatures.