

## PMVictoriaESPPEm Resource

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**From:** Terry, Tomeka  
**Sent:** Thursday, July 12, 2012 2:18 PM  
**To:** VictoriaESP Resource  
**Subject:** FW: Courtesy copy of Exelon letter NP-12-0030 - Response to ER RAI Letter No. 16  
**Attachments:** NP-12-0030 - Response to ER RAI Letter No.16.pdf

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**From:** [Joshua.Trembley@exeloncorp.com](mailto:Joshua.Trembley@exeloncorp.com) [<mailto:Joshua.Trembley@exeloncorp.com>]  
**Sent:** Thursday, July 12, 2012 1:41 PM  
**To:** Terry, Tomeka  
**Cc:** [David.Distel@exeloncorp.com](mailto:David.Distel@exeloncorp.com); [christopher.kerr@exeloncorp.com](mailto:christopher.kerr@exeloncorp.com); [Lisa.Matis@tetrattech.com](mailto:Lisa.Matis@tetrattech.com); [Steven.Connor@tetrattech.com](mailto:Steven.Connor@tetrattech.com); [dpatton@bechtel.com](mailto:dpatton@bechtel.com); [acarson@bechtel.com](mailto:acarson@bechtel.com); [avci@anl.gov](mailto:avci@anl.gov); [wescott@anl.gov](mailto:wescott@anl.gov); [GPoremba@entrix.com](mailto:GPoremba@entrix.com); Purdie, Michael; Mussatti, Daniel  
**Subject:** Courtesy copy of Exelon letter NP-12-0030 - Response to ER RAI Letter No. 16

Tomeka,

Please find attached a courtesy copy of Exelon letter NP-12-0030. The letter provides a complete response to NRC RAI letter No.16 (Socioeconomics and EJ).

NP-12-0030 was submitted to the NRC Document Control Desk this afternoon via US Mail. Hard carbon copies were sent to you and ANL. Please note that we intend to use the NRC EIE system to submit letters when it is feasible; however, for letters such as NP-12-0030, the inclusion of certain content (e.g., color figures or multiple attachments) and the resulting file sizes and attributes are better suited to hard copy submittals.

Please let me know if you have questions regarding the submittal.

Thank you and have a good afternoon,  
JT

610-765-5345

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**Mail Envelope Properties** (0A64B42AAA8FD4418CE1EB5240A6FED199798124D5)

**Subject:** FW: Courtesy copy of Exelon letter NP-12-0030 - Response to ER RAI Letter No. 16  
**Sent Date:** 7/12/2012 2:17:51 PM  
**Received Date:** 7/12/2012 2:17:57 PM  
**From:** Terry, Tomeka

**Created By:** Tomeka.Terry@nrc.gov

**Recipients:**  
"VictoriaESP Resource" <VictoriaESP.Resource@nrc.gov>  
Tracking Status: None

**Post Office:** HQCLSTR02.nrc.gov

Files	Size	Date & Time
MESSAGE	2087	7/12/2012 2:17:57 PM
NP-12-0030 - Response to ER RAI Letter No.16.pdf		791872

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**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

NP-12-0030  
July 12, 2012

10 CFR 52, Subpart A

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Subject: Exelon Nuclear Texas Holdings, LLC  
Victoria County Station  
Early Site Permit Application  
Environmental Report – Response to ER RAI Letter No.16  
Docket No. 52-042

References: (1) USNRC letter to Ms. Marilyn C. Kray, Environmental Request for Additional Information Letter No.16 Related to Socioeconomics and Environmental Justice for Victoria County Station Early Site Permit Application, dated May 31, 2012

Exelon is responding to the following questions contained in NRC Request for Additional Information (RAI) letter No.16 (Reference 1):

RAI	eRAI	NP-12-0030 Attachment
SE 2.5.1-1	6461	1
SE 2.5.1-2	6461	2
SE 2.5.2.1-1	6461	3
SE 2.5.2.2-1	6461	4
SE 2.5.2.3.4-1	6461	5
SE 2.5.2.5-1	6461	6
SE 2.5.2.6-1	6461	7
SE 2.5.2.7-1	6461	8
SE 2.5.2.8-1	6461	9
SE 2.5.2.8-2	6461	10
SE 2.5.4-1	6461	11
SE 4.4.2-1	6462	12
SE 4.4.2-2	6462	13
SE 4.4.2-3	6462	14
SE 4.4.2-4	6462	15
SE 4.4.3-1	6462	16
SE 5.8.2-1	6510	17
SE 5.8.3-1	6510	18
SE 5.11-1	6511	19
SE 5.11.2	6511	20

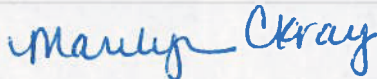
Exelon's responses to the above-referenced RAIs constitute a complete response to NRC RAI Letter No.16.

As indicated in the above table, the RAI responses comprise Attachments 1-20. Regulatory commitments are summarized in Attachment 21. Enclosure 1 is a compact disc (CD) containing ER Appendix B. As discussed with the NRC at the ER audit, Appendix B will be added to the ER in a future ESPA revision to document Exelon's updated socioeconomic and environmental justice analyses. Enclosure 1 also provides the references cited in Appendix B.

If additional information is required, please contact Joshua Trembley at (610) 765-5345.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 12<sup>th</sup> day of July, 2012.

Respectfully,



Marilyn C. Kray  
Vice President, Nuclear Project Development

Attachments:

- |                                    |                |
|------------------------------------|----------------|
| (1) Response to RAI SE 2.5.1-1     | (eRAI No.6461) |
| (2) Response to RAI SE 2.5.1-2     | (eRAI No.6461) |
| (3) Response to RAI SE 2.5.2.1-1   | (eRAI No.6461) |
| (4) Response to RAI SE 5.2.2-1     | (eRAI No.6461) |
| (5) Response to RAI SE 2.5.2.3.4-1 | (eRAI No.6461) |
| (6) Response to RAI SE 2.5.2.5-1   | (eRAI No.6461) |
| (7) Response to RAI SE 2.5.2.6-1   | (eRAI No.6461) |
| (8) Response to RAI SE 2.5.2.7-1   | (eRAI No.6461) |
| (9) Response to RAI SE 2.5.2.8-1   | (eRAI No.6461) |
| (10) Response to RAI SE 2.5.2.8-2  | (eRAI No.6461) |
| (11) Response to RAI SE 2.5.4-1    | (eRAI No.6461) |
| (12) Response to RAI SE 4.4.2-1    | (eRAI No.6462) |
| (13) Response to RAI SE 4.4.2-2    | (eRAI No.6462) |
| (14) Response to RAI SE 4.4.2-3    | (eRAI No.6462) |
| (15) Response to RAI SE 4.4.2-4    | (eRAI No.6462) |
| (16) Response to RAI SE 4.4.3-1    | (eRAI No.6462) |
| (17) Response to RAI SE 5.8.2-1    | (eRAI No.6510) |
| (18) Response to RAI SE 5.8.3-1    | (eRAI No.6510) |
| (19) Response to RAI SE 5.11-1     | (eRAI No.6511) |
| (20) Response to RAI SE 5.11.2     | (eRAI No.6511) |
| (21) Summary of Commitments        |                |

Enclosures:

- (1) CD titled "Victoria County Station, Early Site Permit Application, Part 3, Environmental Report, RAI 6461, 6462, 6510, and 6511 Responses, ER Appendix B, NP-12-0030, Enclosure 1, July 2012"

cc: USNRC, Director, Office of New Reactors/NRLPO (w/out enclosures)  
USNRC, Project Manager, VCS, Division of New Reactor Licensing (w/out enclosures)  
USNRC, Environmental Project Manager, VCS, Division of New Reactor Licensing (w/enclosures)  
USNRC Region IV, Regional Administrator (w/out enclosures)  
Argonne National Laboratory, Project Manager, VCS (w/enclosures)  
EDMS

**SE 2.5.1-1 (eRAI 6461):**

**NRC Request:**

SE 2.5.1-1 ESRP Section 2.5.1 directs the staff to review the applicant's population data presented in the environmental report (ER). Population data were based on the 2000 census data throughout ER Section 2.5.1. Provide for the demographics within the region, more recent population data and estimates using verifiable sources such as the 2010 census and ACS data. Provide updated population estimates for ER Section 2.5.1.

**Response:**

Exelon has prepared a new appendix to the VCS ER, Appendix B, "Update of Socioeconomics Data and Analyses." This appendix provides updates to Section 2.5.1 of the VCS ER plus updates for other ER sections addressing socioeconomics.

The new Section B2.5.1, "Demography," provides updated population for 10- and 50-mile radii using 2010 census data (Table B2.5.1-1). Included are population projections by decade to 2080. The section also includes populations of the larger municipalities (Table B2.5.1-3) and age distributions of the population (Table B2.5.1-5) using American Community Survey (ACS) data for 2006-2010. County populations and the 6-county region of influence (ROI) population, with projections to 2040, are provided from the Texas State Data Center (Table B2.5.1-4). ROI population is also provided from both the 2010 census and 2006-2010 ACS data.

**Associated ESPA Revisions:**

Appendix B will be added to the VCS ER in a subsequent ER revision and is included on the compact disc provided as Enclosure 1.

**SE 2.5.1-2 (eRAI No.6461):**

**NRC Request:**

SE 2.5.1-2 ESRP Section 2.5.1 directs the staff to review the applicant's transient population data presented in the ER. Transient populations should be updated to include current projects and investments. Such projects could include, but are not limited to, the Eagle Ford shale oil play, the new Caterpillar plant/facility, Caterpillar downstream manufacturing facilities, Invista plant reconfiguration, Port of Victoria expansion, hotel and residential housing development, and other major project workers in the ROI and 8-county area. Provide updated transient population estimates for ER Section 2.5.1.3.

**Response:**

Exelon has prepared a new appendix to the VCS ER, Appendix B, "Update of Socioeconomics Data and Analyses." This appendix provides updates to Section 2.5.1 of the VCS ER plus updates for other ER sections addressing socioeconomics.

The new Section B2.5.1.3, "Transient Populations," provides updated hotel and motel occupancy (Table B2.5.1-7) and seasonal housing vacancies (Table B2.5.1-8) for the 8-county region. Also, a complete recalculation of transients within 10 miles of the site was performed based on major employers, overnight accommodations (including hotels, motels, and seasonal housing), and major recreation areas. These transient populations are included with the residents in Table B2.5.1-1, which gives the population within 10 miles and within 50 miles of the site projected by decade up to 2080. The revised 10-mile transient population is 2,028 people.

**Associated EPA Revisions:**

Appendix B will be added to the VCS ER in a subsequent ER revision and is included on the compact disc provided as Enclosure 1.

**SE 2.5.2.1-1 (eRAI No.6461):**

**NRC Request:**

SE 2.5.2.1-1 ESRP Section 2.5.2 directs the staff to review the applicant's employment and unemployment data presented in the ER. Update employment characteristics to recognize new local employment conditions with verifiable sources such as BLS, BEA, and local information for the ROI. Such information could include, but is not limited to, new employer characteristics at the Eagle Ford shale oil play, Invista plant reconfiguration, Caterpillar plant construction/operation, Caterpillar downstream manufacturing facilities, Port of Victoria expansion, hotel and residential housing development, and other major project workers for the ROI. Provide updated employment and unemployment information and projections for ER Section 2.5.2.1.

**Response:**

Exelon has prepared a new appendix to the VCS ER, Appendix B, "Update of Socioeconomics Data and Analyses." This appendix provides updates to Section 2.5.2.1 of the VCS ER plus updates for other ER sections addressing socioeconomics.

The new Appendix B provides updated tables on employment trends, employment by industry sector, wages by industry sector, and per capita income (Tables 2.5.2-1 through 2.5.2-6). Projected future projects, with their employment information, are addressed in the new cumulative impacts analysis provided in response to RAI 6431. Exelon's response to RAI 6431 will be provided to the NRC no later than July 23, 2012, in accordance with the 60-day timeframe requested in RAI Letter No. 10.

**Associated ESPA Revisions:**

Appendix B will be added to the VCS ER in a subsequent ER revision and is included on the compact disc provided as Enclosure 1.



**SE 2.5.2.2-1 (eRAI No.6461):****NRC Request:**

SE 2.5.2.2-1 ESRP Section 2.5.2 directs the staff to review the applicant's transportation/traffic data presented in the ER. Double-check numbers to make sure that all data is still accurate, including ongoing changes at the Port of Victoria. Add LOS to Table 2.5.2-7, Road Characteristics and Traffic Statistics, and a description to the narrative. Provide updated transportation/traffic information and projections for ER Section 2.5.2.2.

**Response:**

Exelon has prepared a new appendix to the VCS ER, Appendix B, "Update of Socioeconomics Data and Analyses." This appendix provides updates to Section 2.5.2.2 of the VCS ER plus updates for other ER sections addressing socioeconomics.

The new Appendix B reports that traffic data reported in Table 2.5.2-7, "Road Characteristics and Traffic Statistics," of the ER have not been updated; however, data for some new locations near VCS were found and reported. Exelon confirmed that Texas does not have level of service data on the roads near VCS. Updated barge traffic has been provided in Table B2.5.2-8, "Victoria Barge Canal, Number of Trips, 2001–2009," and Table B2.5.2-10, "Port of Victoria, Freight Tonnage, 1992–2009." Also, Tables B2.5.2-11, "Characteristics of Public Airports within 50 Miles of Proposed VCS Site," and B2.5.2-12, "Victoria Regional Airport Passenger Boardings, 2001 – 2010," provide updated information on air travel.

**Associated ESPA Revisions:**

Appendix B will be added to the VCS ER in a subsequent ER revision and is included on the compact disc provided as Enclosure 1.

**SE 2.5.2.3.4-1 (eRAI No.6461):**

**NRC Request**

SE 2.5.2.3.4-1 ESRP Section 2.5.2 directs the staff to review the applicant's project site tax data presented in the ER. Provide additional information about the acreage, taxable value, location, and school district location for the two parcels that were added to the project site (see ER Table 2.5.2-19). Provide additional VCS site parcels and assessed value data for ER Section 2.5.2.3.4.

**Response:**

Exelon has prepared a new appendix to the VCS ER, Appendix B, "Update of Socioeconomics Data and Analyses." This appendix provides updates to Section 2.5.2.3.4 of the VCS ER plus updates for other ER sections addressing socioeconomics.

Tables B2.5.2-15, "Total Real Property Tax Rates in ROI Counties, 2004-2010," B2.5.2-16, "Total Property Taxes in Victoria County, 1996-2010," B2.5.2-19, "Proposed VCS Site Parcels and Assessed Value, 2011," and B2.5.2-20, "Total Property Taxes on Proposed VCS Site for Victoria County and Special Districts, 2010-2011" contain updated information.

**Associated ESPA Revisions:**

Appendix B will be added to the VCS ER in a subsequent ER revision and is included on the compact disc provided as Enclosure 1.

**SE 2.5.2.5-1 (eRAI No.6461):**

**NRC Request**

SE 2.5.2.5-1 ESRP Section 2.5.2 directs the staff to review the applicant's recreational use and availability data presented in the ER. Provide City, County, and ROI recreational facility and area use and availability data, if available. If not, indicate the jurisdictions where acres/1,000 population does not meet the standard selected as presented in ER table 2.5.2-33. Provide additional recreational use and availability data for ER Section 2.5.2.5.

**Response:**

Exelon has prepared a new appendix to the VCS ER, Appendix B, "Update of Socioeconomics Data and Analyses." This appendix provides updates to Section 2.5.2.5 of the VCS ER plus updates for other ER sections addressing socioeconomics.

The new Appendix B contains Table B2.5.2-32, which lists locations, acreages, and other updated information for the wildlife management areas, national wildlife refuges, and state parks within the 50-mile region. Table B2.5.2-33 provides updated information on county and city parks within the 50-mile region.

**Associated ESPA Revisions:**

Appendix B will be added to the VCS ER in a subsequent ER revision and is included on the compact disc provided as Enclosure 1.

**SE 2.5.2.6-1 (eRAI No.6461):****NRC Request:**

SE 2.5.2.6-1 ESRP Section 2.5.2 directs the staff to review the applicant's hotel/motel and housing estimates and projections presented in the ER. The 2000 census housing data used to characterize number and types of units, vacancy, and adequacy of structures may no longer accurately reflect existing conditions. The staff assumes that housing data from organizations such as the regional planning organization (GCRPC), the Swearingen Report (Ron Brown Company – Caldwell Banker, September 2011), or other authoritative sources may provide more detailed information relative to the communities that could be affected by an influx of workers. Additional data relative to temporary lodging (hotels, motels, RV parks) would also be needed to assess potential impacts of the temporary construction workforce. Provide updated hotel/motel and housing estimates and projections for ER Section 2.5.2.6.

**Response:**

Exelon has prepared a new appendix to the VCS ER, Appendix B, "Update of Socioeconomics Data and Analyses." This appendix provides updates to Section 2.5.2.6 of the VCS ER plus updates for other ER sections addressing socioeconomics.

The new Appendix B contains updated information in the following tables:

Table B2.5.2-34, "ROI Housing, 2000 to 2006-2010"

Table B2.5.2-35, "ROI Population Center Housing, 2006-2010"

Table B2.5.2-36, "Hotel/Motel Data, Third Quarter, 2011"

Table B2.5.2-37, "ROI Housing Inventory by Price Range, 2006-2010"

Updated recreational vehicle park data is provided in the Section B2.5.2.6.3 text.

**Associated ESPA Revisions:**

Appendix B will be added to the VCS ER in a subsequent ER revision and is included on the compact disc provided as Enclosure 1.

**SE 2.5.2.7-1 (eRAI No.6461):****NRC Request**

SE 2.5.2.7-1 ESRP Section 2.5.2 directs the staff to review the applicant's infrastructure and public services data presented in the ER. Provide updated information about the latest ROI infrastructure improvements (water, sewer, streets and other); new or additional water rights capacities and treatment plant upgrades; and police / fire /emergency response capabilities. Provide updated infrastructure and public services information for ER Section 2.5.2.7.

**RAI Response:**

Exelon has prepared a new appendix to the VCS ER, Appendix B, "Update of Socioeconomics Data and Analyses." This appendix provides updates to Section 2.5.2.7 of the VCS ER plus updates for other ER sections addressing socioeconomics.

The new Appendix B contains the following updated tables:

Table B2.5.2-38, "Major Water Suppliers in the ROI"  
Table B2.5.2-39, "Major Wastewater Treatment Systems in the ROI, 2010"  
Table B2.5.2-40, "Region L Projected Water Demands for 2010 and 2060"  
Table B2.5.2-41, "Region L Existing Major Water Supply Sources for 2010 and 2060"  
Table B2.5.2-42, "Region P Projected Water Demands for 2010 and 2060"  
Table B2.5.2-43, "Region P Existing Major Water Supply Sources for 2010 and 2060"  
Table B2.5.2-44, "Law Enforcement Personnel, ROI, 2010"  
Table B2.5.2-45, "Fire Protection Personnel, 2010"  
Table B2.5.2-46, "Law Enforcement and Fire Protection Ratios, 2010"  
Table B2.5.2-47, "Public Protection Classification Ratings in the ROI"  
Table B2.5.2-48, "2006 Hospital Data and 2010 Physician Data"

The City of Victoria has also provided tables on street re-paving projects online at <http://www.victoriatx.org/publicworks/streets.asp>. These tables are attached to this RAI response.

**Associated ESPA Revisions:**

Appendix B will be added to the VCS ER in a subsequent ER revision and is included on the compact disc provided as Enclosure 1.



## 2011 Street Repaving Projects

Project Name	Total Cost for Rehab	Contractor	Blocks to be Paved	Additional Addresses Affected
<i>Downtown Street Overlay &amp; ADA Ramp</i>	\$ 1,140,557.29	Brannan Paving	100 - 200 W. Commercial; 100 - 200 W. Goodwin St.; 200 W. Forrest St.; 200 W. Constitution St.; 100 - 200 E Constitution St.; 200 W. - 200 E. Santa Rosa St.; 300 N. - 200 S. Glass St.; 100 S. Liberty; 100 S. William St.	101, 115, 205, 402 & 407 N. Bridge; 101 & 209 W. Forrest; 102 N. Main; 101 S. Bridge; 210 W. Juan Linn; 102, 120, 121 & 201 S. Main; 207 W. Commercial; 208 Goodwin; 125 E. Constitution; 202 E. Santa Rosa
<i>Sam Houston Dr. Reconstruction</i>	\$ 18,109,315.90	SER	3100 - 100 Sam Houston Dr.	1702 Neil Fox Dr.; 1701 Victoria Station Dr.; 4405 Halsey; 1705 Leary Ln.; 101 & 102 N. Crescent; 102 & 101 S. Crescent; 2002 Polk Ave.; 2502 Kay Dr., 4102 N. Ben Jordan; 2501 Lenora Dr.; 1602 Milam; 2207 E. Crestwood; 2306, 2309 & 2311 Anaqua; 2501 Misteltoe; 2502 Erwin Ave.; 2906 Airline; 3606 Cedar; 3406 Cherry St.; 102 Birchwood Dr.; 101 & 102 Tanglewood Dr.; 101 & 102 Palmwood; 3408 Red River; 3602 Houston Hwy.
<i>Red River Sanitary Sewer Rehab &amp; Street Overlay</i>	\$ 2,574,975.75	Lester	2100 - 3600 Red River	3209 N. Ben Wilson St.; 2801 Del Papa; 3402 & 3502 Houston Hwy.
<i>2009-10 Rehab/Overlay Project</i>	\$ 1,019,796.25	Brannan Paving	100 Imperial Dr.; 100 - 200 Circle St.; 2900 - 3000 Circle St.; 100 - 400 Industrial Dr.; 200 - 400 Anaqua Ave.	



## 2012 Street Repaving Projects

Project Name	Total Cost for Rehab	Blocks to be Paved	Additional Addresses Affected
<i>Greenbriar Addition Rehab/Overlay</i>	Est. \$2,600,000.00	900 -1400 Nimitz St.; 900 - 1400 Halsey St.; 900 - 1400 Eisenhower St.; 1700 - 1800 Woodlawn St.; 1700 - 1800 Morningside St.; 1700 - 1800 Glendale St.; 1700 - 1800 Avondale St.; 1700 - 1800 Meadowlane St.; 1700 - 1800 Wildwood	
<i>Huvar Street</i>	Est. \$365,000.00	100 Huvar St.	6802 & 6702 N. Navarro
<i>John Stockbauer Improvements PH. I</i>	Est. \$2,541,644.00	1600-2100 S. John Stockbauer	
<i>John Stockbauer Improvements PH. II</i>	Est. \$6,278,513.00	100-1500 S. John Stockbauer	

**SE 2.5.2.8-1 (eRAI No.6461):**

**NRC Request**

SE 2.5.2.8-1 ESRP Section 2.5.2 directs the staff to review the applicant's schools and higher education capabilities data presented in the ER. Provide updated information about the latest additions to school facilities, conversion of the University of Houston campus to a 4-year institution, and training programs in Victoria County and the surrounding ROI. Provide updated schools and higher education capabilities information for ER Section 2.5.2.8.

**Response:**

Exelon has prepared a new appendix to the VCS ER, Appendix B, "Update of Socioeconomics Data and Analyses." This appendix provides updates to Section 2.5.2.8 of the VCS ER plus updates for other ER sections addressing socioeconomics.

The new Appendix B contains the following updated tables:

Table B2.5.2-49, "Revenue Sources for ISDs in the ROI-Percent"

Table B2.5.2-50, "2011-2012 Enrollment and Capacities of Public Schools in the ROI"

Post-secondary school information is updated in Section B2.5.2.8.2.

**Associated ESPA Revisions:**

Appendix B will be added to the VCS ER in a subsequent ER revision and is included on the compact disc provided as Enclosure 1.



**SE 2.5.2.8-2 (eRAI No.6461):****NRC Request**

SE 2.5.2.8-2 ESRP Section 2.5.2 directs the staff to review the applicant's schools and higher education capabilities data presented in the ER. In correspondence from Exelon Generation on May 5, 2011 (NP-11-0015; D087 LIRO), updated information was provided indicating that the VCS site consists of 11 total parcels, with 9 of those parcels in the Refugio ISD and 2 parcels in the Victoria ISD. Although this topic is discussed in the ESP ER Section 2.5.2.3.5, updated pertinent information and discussions about funding issues for the Refugio ISD and Victoria ISD should also be provided in ESP ER Sections 2.5.2.8.1.5 and 2.5.2.8.1.6. The ESP ER Section 4.4.2.2.2 (page 4.4-26) indicated that the power block would be located in the Victoria ISD, but discussions with local leaders during the Site Audit indicated that the power block would be located in the Refugio ISD. Confirm the proposed location of the power block and describe Victoria ISD's "property-poor" (Chapter 42) property tax revenue status and Refugio ISD's "property-wealthy" (Chapter 41) status in Section 2.5.2.8, as a baseline for understanding later impact analyses. Provide additional school/education information for ER Section 2.5.2.8.

**Response:****SE 2.5.2.8-2**

Exelon has prepared a new appendix to the VCS ER, Appendix B, "Update of Socioeconomics Data and Analyses." This appendix provides updates to Section 2.5.2.8 of the VCS ER plus updates for other ER sections addressing socioeconomics.

The new Appendix B contains updated information in Table B2.5.2-49, "Revenue Sources for ISDs in the ROI – Percent." Most of the VCS, including the powerblock, is located in the Refugio ISD. The wording in Section 4.4.2.2.2 is incorrect; however, the data presented in Table 2.5.2-19, "Proposed VCS Site Parcels and Assessed Value" (and its update Table B2.5.2-19) and in Table 2.5.2-23, "Property Taxes Paid on Proposed VCS Site ISDs" (and its update in Table B2.5.2-23) indicate that most of the property taxes are paid to the Refugio ISD.

Figure 6461-1 shows the boundary of the nearby ISDs superimposed on the VCS site layout. Although the GIS data were prepared at different scales, and thus, do not match perfectly at the scale used in this figure, it is clear that VCS is predominantly in the Refugio ISD.

Chapter 41 of the Texas Education Code makes provisions for certain school districts to share their local tax revenue with certain other school districts. The Texas Education Agency (TEA 2012) reports the school districts identified as being subject to the provisions of Chapter 41 of the Texas Education Code for the 2011-2012 school year. The list in TEA (2012) includes Refugio County but not Victoria County.

**Reference**

TEA (Texas Education Agency) 2012. "2011-12 Ch. 41 Districts," available online at [http://www.tea.state.tx.us/index2.aspx?id=6937&menu\\_id=645&menu\\_id2=789](http://www.tea.state.tx.us/index2.aspx?id=6937&menu_id=645&menu_id2=789), accessed on June 6, 2012.

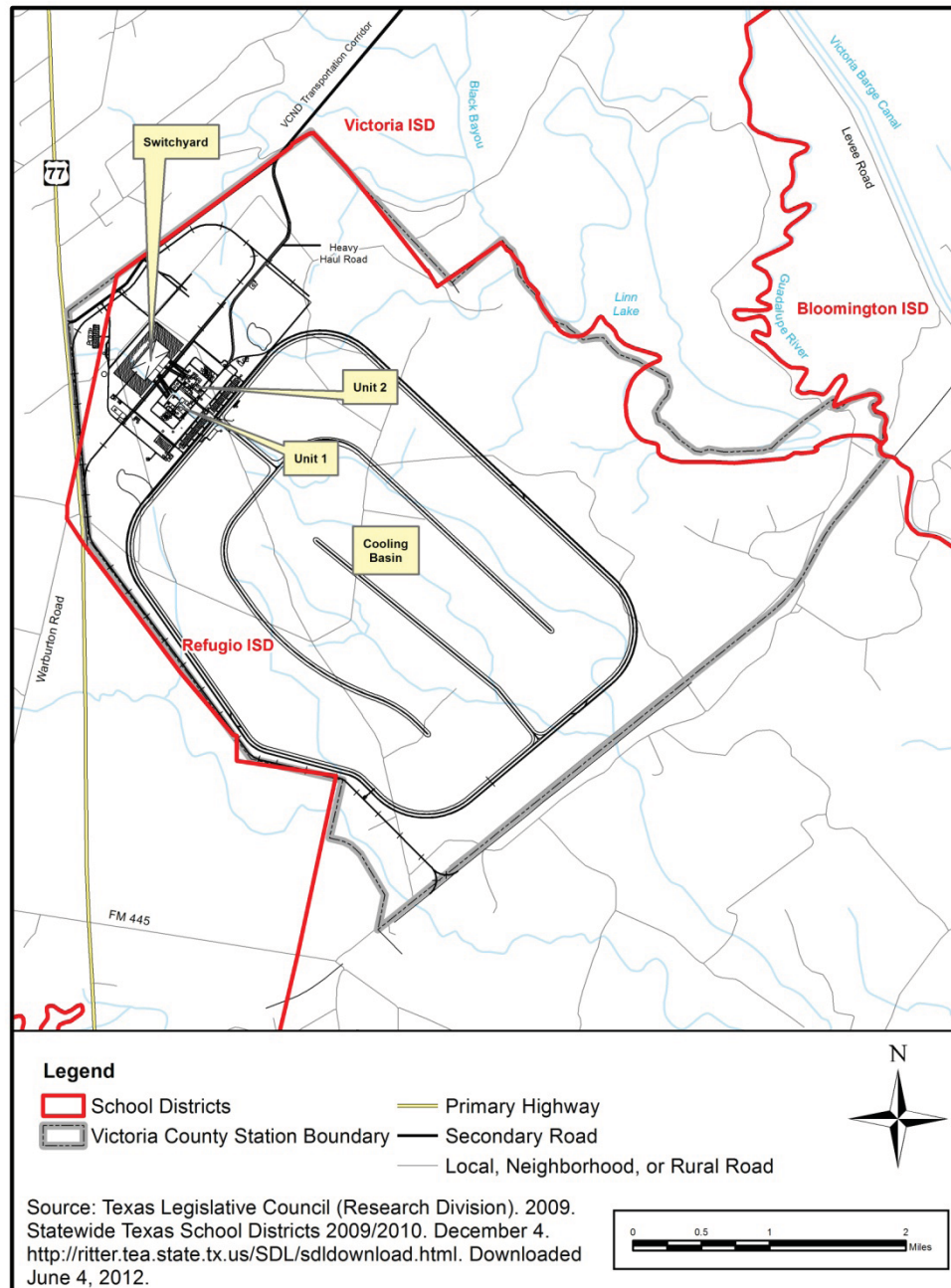


Figure 6461-1 Victoria County Station Site School Districts

**Associated ESPA Revisions:**

Appendix B will be added to the VCS ER in a subsequent ER revision and is included on the compact disc provided as Enclosure 1.

Furthermore, Section 4.4.2.2.2 will be modified in a future revision as indicated below:

According to the Victoria Central Appraisal District's chief appraiser, the allocation of tax revenues between the two ISDs would depend on the exact location of the VCS facilities and land use in relation to the ISD boundary (VCAD Apr 2008). Exelon has determined that the VCS power block would be placed primarily on a parcel that lies within the Refugio ~~Victoria~~ ISD boundaries. Therefore, the Refugio ~~Victoria~~ ISD would receive most of the property taxes that could be paid during the construction period. ~~Victoria~~ Refugio ISD would receive property taxes on construction on the parcels within its borders.

Section 5.8.2.2.2 will be modified in a future revision as indicated below.

**Independent School Districts**

As described in Subsection 2.5.2.3.5, the current landowners of the VCS site pay taxes to the Victoria and Refugio ISDs. As described in Subsection 4.4.2.2.2, Exelon has determined that the VCS site would be located on a parcel within the ~~Victoria~~ Refugio ISD boundaries. Therefore, increases in the valuation and tax payments for that parcel would be substantial, although it is possible that payments to the ~~Refugio~~ Victoria ISD would also increase to an unknown extent.

**SE 2.5.4-1 (eRAI No.6461):**

**NRC Request**

SE 2.5.4-1 ESRP Section 2.5.4 directs the staff to review the applicant's environmental justice minority and low-income population data presented in the ER. Provide updated Census Block Group (CBG) population information for minority and low-income populations using the 2010 Census data, ACS and/or other current sources. Provide updated environmental justice minority and low-income population information for ER Section 2.5.4.

**Response:**

Exelon has prepared a new appendix to the VCS ER, Appendix B, "Update of Socioeconomics Data and Analyses." This appendix provides updates to Section 2.5.4 of the VCS ER plus updates for other ER sections addressing socioeconomics.

The new Appendix B provides updated minority population information in Table B2.5.4-1, "Block Groups within 50 Miles of the Victoria County Site with Significant Minority or Low-Income Populations" and Figures B2.5.4-1 through B2.5.4-5. Table B2.5.4-1 and Figure B2.5.4-6 present updated low-income household information. Exelon used American Community Survey 2006-2010 data.

**Associated EPA Revisions:**

Appendix B will be added to the VCS ER in a subsequent ER revision and is included on the compact disc provided as Enclosure 1.

**SE 4.4.2-1 (eRAI No.6462):****NRC Request**

SE 4.4.2-1 ESRP Section 4.4.2 directs the staff to review the applicant's worker in-migration population data presented in the ER. Provide support for the 95% in-migration assumption, and some additional narrative to ER Section 4.4.2 to support the assumption. Provide additional worker in-migration information for ER Section 4.4.2.

**Response:**

The skills mix of the workforce required to build a nuclear facility is more specialized than that required to build residential, commercial, or even most industrial facilities, dredge a port, or install utility infrastructure. In the ESP ER, Exelon indicated that the construction workforce on this greenfield project site would consist of two components, (1) Field Craft Labor and (2) Field Nonmanual Labor (FNML). Exelon assumed that 5 to 10 percent of the skilled craft workforce would be drawn from within a 50 mile radius of the Victoria County site. The remainder of the craft labor work force was assumed to come from outside the 50 mile area. Nonmanual labor was assumed to come from contractor personnel from outside the 50 mile area. Thus, the analysis assumed that 95 percent of the craft labor and FNML would relocate from outside the 50-mile radius. Although 50 percent construction workforce in-migration was assumed for the South Texas Project (STP) (USNRC 2011), Exelon notes that the STP 50-mile radius extends into Brazoria and Fort Bend counties, which are part of the Houston metropolitan area, offering considerably greater heavy and civil engineering construction worker resources.

The maximum onsite, peak construction workforce for two ESBWR units with a large cooling basin was estimated to be 6300 people. Assuming 5 percent of the construction workforce would be available to the Victoria County Station (VCS) project from within the 50-mile radius, approximately 315 construction workers would be utilized to staff the construction of VCS. Approximately 5985 workers (95 percent of the peak construction workforce) would be expected to migrate into the ROI.

At the time Exelon performed the workforce analysis, the most current socioeconomic data indicated that, in 2005, there were 7037 construction jobs in the ROI (ER Table 2.5.2-2 and Figure 2.5.2-2). Exelon's assumptions regarding in-migrating workers were based on the relatively small size of the existing construction labor force in the ROI. The 315 construction workers who were anticipated to be part of the VCS workforce equated to 4.5 percent of the ROI construction labor force in 2005. The 315 resident workers equated to approximately 30 percent of the ROI workforce in Sector 237, heavy and civil engineering construction (ER Table 4.4.2-3).

The Texas Workforce Commission (TWC) provides historical employment trends and employment projections<sup>1</sup>, by industry, for the state and local regions (TWC 2010). The TWC's most current employment trend and projection data are for 2008 and 2018, respectively. The majority of the VCS socioeconomic ROI falls within one of the regions in Texas, the Golden Crescent region. The Golden Crescent region consists of the following counties: Calhoun, De Witt, Goliad, Gonzales, Jackson, Lavaca, and Victoria. The region does not exactly match the socioeconomic ROI, but is considered a valid proxy because the majority of the socioeconomic ROI counties are included in both regions, especially Victoria County, where the majority of the region's economic activity occurs.

The TWC reports that the size of the construction industry sector (NAICS 23) workforce in the Golden Crescent region was comprised of approximately 5860 workers in 2008 and is expected to grow by 8.2 percent to 6340 workers in 2018. The heavy and civil engineering construction subsector (NAICS 237) was comprised of 1460 workers in 2008, and is expected to grow 9.6 percent to 1600 workers in 2018. (TWC 2010)

Exelon estimates a required VCS construction workforce of approximately 6300 persons. The region's current construction employment base and the heavy and civil engineering base employment base, in particular, is too small and too unspecialized to provide workers to fill most anticipated positions for the following reasons:

- The current, total construction workforce is slightly smaller than that needed for VCS.
- The VCS project would essentially double the regional construction workforce.
- The region's projected construction workforce in 2018 is smaller than needed even if 100 percent of the projected workforce were employed at VCS.
- Other construction projects would be competing for the available workforce, such as those described in ER Section 4.7, Cumulative Impacts.

In summary, it is reasonable to predict that approximately 95 percent of the VCS construction workforce would have to come from outside of its 50-mile region. The region's current construction and heavy and civil engineering construction employment bases would be too small and too unspecialized to provide the majority of workers needed to fill most VCS positions.

#### References:

TWC 2010. Texas Workforce Commission. "Golden Crescent Workforce Development Area. Employment by Industry." Available online at <http://www.tracer2.com/?PAGEID=67&SUBID=114>. Accessed July 3, 2012.

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<sup>1</sup> To develop industry historical employment trends, time series of annual average employment were developed at the 4-digit North American Industry Classification System (NAICS) level for Texas and for 28 regions within the state. The two principal sources for the industry employment time series are the Bureau of Labor Statistics' (BLS) Quarterly Census of Employment and Wages Report (QCEW), and Current Employment Statistics (CES) Survey.

To develop industry employment projections, statewide and labor area historical trends and U.S. relationships were used in conjunction with the forecast of Texas unemployment rates, gross state product, population, personal income, per capita income, and labor force.

U.S. NRC 2011. U.S. Nuclear Regulatory Commission. Environmental Impact Statement for Combined Licenses (COLs) for South Texas Project Electric Generating Station Units 3 and 4, NUREG-1937, ML11049A000, February 2011.

**Associated ESPA Revisions:**

There are no ER changes associated with this response.



**SE 4.4.2-2 (eRAI No.6462):****NRC Request**

SE 4.4.2-2 ESRP Section 4.4.2 directs the staff to review the applicant's construction cost data presented in the ER. Verify the range of plant construction costs assumptions to conduct the impact analyses. Provide additional construction cost information for ER Section 4.4.2.

**Response:**

Exelon has prepared a new appendix to the VCS ER, Appendix B, "Update of Socioeconomics Data and Analyses." This appendix provides updates to Section 4.4.2 of the VCS ER plus updates for other ER sections addressing socioeconomics.

Exelon re-examined its construction cost assumptions and determined that \$3 billion remains a useful lower bound for the sales and use tax evaluation. New wage and tax data were also determined. Then Section B.4.4.2 was written with updated assumptions and calculations. Changes occurred primarily in Section 4.4.2.2.2. New results were reflected in the following tables:

Table B4.4-7	Calculation of VCS Construction Workforce Impacts by Month
Table B4.4-8	Sensitivity Analysis of Impacts to ROI Economy Construction Worker In-Migrant Wages
Table B4.4-9	Impacts by Year from Construction In-Migrating Wages to ROI Economy during Construction Period
Table B4.4-10	Operations Worker In-Migrant Wages by Construction Month during Construction Period
Table B4.4-11	Sensitivity Analysis of Impacts to ROI Economy Operations In-Migrant Wages during Construction Period
Table B4.4-12	Impacts by Year from Operations In-Migrant Wages to ROI Economy during Construction Period
Table B4.4-13	Combined Sensitivity Analysis of Impacts to ROI Economy All VCS Worker In-Migrant Wages during Construction Period
Table B4.4-14	Combined Impacts by Year of all VCS In-Migrant Wages to ROI Economy during Construction Period
Table B4.4-15	Projected Sales Tax Revenues, Victoria County and City of Victoria, 2012–2020 Without VCS
Table B4.4-16	Estimated Sales Tax Impact Ranges, Victoria County and City of Victoria, Construction Expenditures
Table B4.4-17	Hypothetical Scenario: Sales & Use Tax Impacts of VCS Construction Expenditures, Victoria County and the City of Victoria
Table B4.4-19	VCS Property Tax Impacts to Victoria County (General Fund and Special Road and Bridge Fund, millions of dollars)

While preparing Table B4.4-16, Exelon determined that incorrect values were provided in the Expenditures for Construction Goods and Services discussion presented in ER Subsection 4.4.2.2.2, Taxes. The ER will be revised as shown in the Associated ESPA Revisions portion of this response to include the correct values. The ER conclusions are not affected.



**Associated ESPA Revisions:**

Appendix B will be added to the VCS ER in a subsequent ER revision and is included on the compact disc provided as Enclosure 1.

Additionally, the Expenditures for Construction Goods and Services discussion provided in ER Subsection 4.4.2.2.2, Taxes, will be revised as follows:

**Expenditures for Construction Goods and Services**

First paragraph, no change.

Second paragraph, no change.

Third paragraph, no change.

Currently, specific VCS construction-related expenditures are not known. Therefore, Table 4.4-16 presents ranges of expenditures that would result in small, moderate, and large impacts for Victoria County and the city of Victoria for the year 2015, the assumed peak construction year. For the purposes of this analysis, Exelon assumes that taxable expenditures would occur evenly during a 7-year construction period. All impacts would be positive (beneficial). Impacts would be small if taxable expenditures in the unincorporated portion of the county were less than \$~~2264.1~~ million and were less than \$~~2003.0~~ million in the city. Impacts would be moderate if expenditures were between \$~~2264.1~~ million and \$~~4522.3~~ million for the county and between \$~~2003.0~~ million and \$~~4006.0~~ million for the city. Impacts would be large if expenditures were greater than \$~~4522.3~~ million for the county and \$~~4006.0~~ million for the city. The impact of expenditures in other taxing entities in the ROI would depend on the amount of the expenditure and the size of the entity's baseline collections: the smaller the entity's existing tax base, the greater would be the positive impact from expenditures generated by the construction of VCS.

**SE 4.4.2-3 (eRAI No.6462):****NRC Request**

SE 4.4.2-3 ESRP Section 4.4.2 directs the staff to review the applicant's tax revenue data presented in the ER. Verify the tax impacts calculations, add an estimate of worker property tax contributions, and add footnotes or revise titles as appropriate to facilitate understanding of jurisdictional tax revenues addressed by the presented data. Provide additional tax revenue information for ER Section 4.4.2.

**Response:**

Exelon has prepared a new appendix to the VCS ER, Appendix B, "Update of Socioeconomics Data and Analyses." This appendix provides updates to Section 4.4.2.2.2 of the VCS ER plus updates for other ER sections addressing socioeconomics.

Exelon obtained the most recent information on taxes and prepared Section B4.4.2.2.2 of the new Appendix B. New tax data are reflected in the following tables:

Table B4.4-15	Projected Sales Tax Revenues, Victoria County and City of Victoria, 2012–2020 Without VCS
Table B4.4-16	Estimated Sales Tax Impact Ranges, Victoria County and City of Victoria, Construction Expenditures
Table B4.4-17	Hypothetical Scenario: Sales & Use Tax Impacts of VCS Construction Expenditures, Victoria County and the City of Victoria
Table B4.4-19	VCS Property Tax Impacts to Victoria County (General Fund and Special Road and Bridge Fund, millions of dollars)

Counties in the ROI could benefit from an increase in housing values and housing inventory demand caused by the influx of workers during construction, thereby further increasing property tax revenues for the counties and special taxing districts. However, quantifying the impact is not possible. There is ample housing in the ROI to accommodate workers during construction, so there is unlikely to be a meaningful increase in property values created by the temporary change in housing demand. In addition, the precise worker residential preference by county, by housing type, by price within the ROI cannot be determined. The impact on property taxes from workers is likely to be SMALL, given the ample housing available, the size of the six-county ROI, and the temporary nature of the construction workforce.

**Associated ESPA Revisions:**

Appendix B will be added to the VCS ER in a subsequent ER revision and is included on the compact disc provided as Enclosure 1.

**SE 4.4.2-4 (eRAI No.6462):****NRC Request**

SE 4.4.2-4 ESRP Section 4.4.2 directs the staff to review the applicant's potential construction workforce residence distribution data presented in the ER. Conduct, or provide a previous analysis, to identify where the construction workforce would likely reside in the ROI at the county level. Provide an existing model or prepare a new model for construction workforce distribution (for example a gravity model). Re-evaluate impacts as needed based upon that analysis. Provide additional information about potential construction workforce residence distribution for ER Section 4.4.2

**Response:**

The *Calculation Package, Socioeconomic ROI Analysis for the Exelon COL Environmental Report* (December 2007; included on the CD provided as Enclosure 1) describes the process and provides the quantitative data to support the determination of the socioeconomic region of influence (ROI) for this project. Although several variables were evaluated in the analysis, existing county-to-county worker flow patterns were weighted more heavily, as they provided relatively current commuter patterns demonstrating that many workers living in each of the six counties ultimately included in the socioeconomic ROI actually work in Victoria County. Of Calhoun County commuters, 7.4 percent work in Victoria County; of DeWitt commuters, 10.0 percent work in Victoria County; in Goliad, 30.3 percent of commuters work in Victoria County; in Jackson County, 13.8 percent of commuters work in Victoria County, and in Refugio County, 4.3 percent of the commuters work in Victoria County. The county-to-county worker data represents where Victoria County workers elected to live without relying on hypothetical models. As described in the ROI Analysis, each of the six ROI counties would likely experience project-related impacts as some workers and their families would choose to live in the counties. The ROI analysis did not speculate as to the proportional residential distribution within region but concluded that approximately 95 percent of construction workforce and 100 percent of the operations workforce during construction would select residences within the region as a whole.

To analyze likely residential distribution patterns from an alternate perspective, Exelon also formulated several gravity models with differing variables. These models and the analysis of the results are contained in a separate document, *Victoria County Station In-migrants Residential Distribution Models* (included on the CD provided as Enclosure 1). Each gravity model suggests that a large majority of the in-migrating workers during construction would elect to reside in Victoria County. Existing worker flow patterns, as described *Socioeconomic ROI Analysis*, demonstrated that 86.5 percent of the jobs in Victoria County are held by residents of Victoria County and that an additional approximately 9 percent of the jobs in the County are held by residents of the other five counties in the ROI. The gravity models predict a similar residential distribution. Given the proximity of the VCS site to the city of Victoria and the weight of relative distance of the VCS site to the applicable county seat ( $r^2$  in the gravity model formulas), the models may slightly over populate Victoria County at the expense of the more distant venues. Victoria County is the host county, and coupled with Victoria County's large population (55% of the ROI) and housing inventory (51% of the ROI) (both population and housing are variables in the gravity models), the gravity model results are defensible. The

residential distributions suggested by the gravity models do not contradict the existing residential distribution patterns of commuters who work in Victoria County.

The six-county socioeconomic ROI has been defined, in part, on existing residential and commuting patterns rather than hypothetically based patterns on theoretical (but valid) assumptions of the importance of travel distances, available housing and/or temporary shelter options. The original analysis used to define the ROI does not contradict the results in any of the gravity models. Therefore, Exelon concludes that the socioeconomic ROI has been correctly defined and that residential distribution at a level more detailed than the regional level is not appropriate. The ER, including the new Appendix B, provides analysis of impacts to various resources and capacities based on the six-county ROI.

**Associated ESPA Revisions:**

Appendix B will be added to the VCS ER in a subsequent ER revision and is included on the compact disc provided as Enclosure 1.

**SE 4.4.3-1 (eRAI No.6462):****NRC Request**

SE 4.4.3-1 ESRP Section 4.4.3 directs the staff to review the applicant's minority population potential impacts presented in the ER. Provide additional discussion and analysis about the potential minority population impacts from Highway 77 bordering the Hispanic CBG, and potential impacts from construction related traffic. Provide additional information about minority population potential impacts for ER Section 4.4.3.

**Response:**

Exelon has prepared a new appendix to the VCS ER, Appendix B, "Update of Socioeconomics Data and Analyses." This appendix provides updates to Sections 2.5.4 and 4.4.3 of the VCS ER plus updates for other ER sections addressing socioeconomics. Census block groups with Hispanic populations identified from 2000 census data are reported in the VCS ER, Section 2.5.4 and Figure 2.5.4-5. These areas are the same as those reported in the new Appendix B, Section B2.5.4 and Figure B2.5.4-5 using 2006-2010 American Community Survey data.

U.S. Highway 77 borders block groups with significant Hispanic populations in Refugio County and in the city of Victoria (Figure B2.5.4-5 in Appendix B), but it does not run through these areas. Section B4.4.3 addresses impacts on these Hispanic areas from the increased traffic on U.S. 77. Exelon notes that the areas on the other side of the highway from the Hispanic areas are non-Hispanic and that U.S. 77 has the capacity to absorb all the construction-related traffic.

**Associated EPA Revisions:**

Appendix B will be added to the VCS ER in a subsequent ER revision and is included on the compact disc provided as Enclosure 1.

**SE 5.8.2-1 (eRAI No.6510):****NRC Request**

SE 5.8.2-1 ESRP Section 5.8.2 directs the staff to review the applicant's potential operational workforce residence distribution impacts presented in the ER. Conduct, or provide a previous analysis, to identify where the construction workforce would likely reside in the ROI at the county level. Provide an existing model or prepare a new model for operational workforce distribution (for example a gravity model). Reevaluate impacts as needed based upon that analysis. Provide additional information about potential operational workforce residence distribution for ER Section 5.8.2.

**Response:**

The *Calculation Package, Socioeconomic ROI Analysis for the Exelon COL Environmental Report* (December 2007; included on the CD provided as Enclosure 1) describes the process and provides the quantitative data to support the determination of the socioeconomic region of influence (ROI) for this project. Although several variables were evaluated in the analysis, existing county-to-county worker flow patterns were weighted more heavily, as they provided relatively current commuter patterns demonstrating that many workers living in each of the six counties ultimately included in the socioeconomic ROI actually work in Victoria County. Of Calhoun County commuters, 7.4 percent work in Victoria County; of DeWitt commuters, 10.0 percent work in Victoria County; in Goliad, 30.3 percent of commuters work in Victoria County; in Jackson County, 13.8 percent of commuters work in Victoria County, and in Refugio County, 4.3 percent of the commuters work in Victoria County. The county-to-county worker data represents where Victoria County workers elected to live without relying on hypothetical models. As described in the ROI Analysis, each of the six ROI counties would likely experience project-related impacts as some workers and their families would choose to live in the counties. The ROI analysis did not speculate as to the proportional residential distribution within region but concluded that approximately 95 percent of construction workforce and 100 percent of the operations workforce during construction would select residences within the region as a whole.

To analyze likely residential distribution patterns from an alternate perspective, Exelon also formulated several gravity models with differing variables. These models and the analysis of the results are contained in a separate document, *Victoria County Station In-migrants Residential Distribution Models* (included on the CD provided as Enclosure 1). Each gravity model suggests that a large majority of the in-migrating operations workers would elect to reside in Victoria County. Existing worker flow patterns, as described *Socioeconomic ROI Analysis*, demonstrated that 86.5 percent of the jobs in Victoria County are held by residents of Victoria County and that an additional approximately 9 percent of the jobs in the County are held by residents of the other five counties in the ROI. The gravity models predict a similar residential distribution. Given the proximity of the VCS site to the city of Victoria and the weight of relative distance of the VCS site to the applicable county seat ( $r^2$  in the gravity model formulas), the models may slightly over populate Victoria County at the expense of the more distant venues. Victoria County is the host county, and coupled with Victoria County's large population (55% of the ROI) and housing inventory (51% of the ROI) (both population and housing are variables in the gravity models), the gravity model results are defensible. The residential

distributions suggested by the gravity models do not contradict the existing residential distribution patterns of commuters who work in Victoria County.

The six-county socioeconomic ROI has been defined, in part, on existing residential and commuting patterns rather than hypothetically based patterns on theoretical (but valid) assumptions of the importance of travel distances, available housing and/or temporary shelter options. The original analysis used to define the ROI does not contradict the results in any of the gravity models. Therefore, Exelon concludes that the socioeconomic ROI has been correctly defined and that residential distribution at a level more detailed than the regional level is not appropriate. The ER, including the new Appendix B, provides analysis of impacts to various resources and capacities under several hypothetical scenarios.

**Associated ESPA Revisions:**

Appendix B will be added to the VCS ER in a subsequent ER revision and is included on the compact disc provided as Enclosure 1.

**SE 5.8.3-1 (eRAI No.6510):****NRC Request**

SE 5.8.3-1 ESRP Section 5.8.3 directs the staff to review the applicant's minority population potential impacts presented in the ER. Provide additional discussion and analysis about the potential minority population impacts from Highway 77 bordering the Hispanic CBG, and potential impacts from operations related traffic. Provide additional information about minority population potential impacts for ER Section 5.8.3.

**Response:**

Exelon has prepared a new appendix to the VCS ER, Appendix B, "Update of Socioeconomics Data and Analyses." This appendix provides updates to Sections 2.5.4, 4.4.3, and 5.8.3 of the VCS ER plus updates for other ER sections addressing socioeconomics. Census block groups with Hispanic populations identified from 2000 census data are reported in the VCS ER, Section 2.5.4 and Figure 2.5.4-5. These areas are the same as those reported in the new Appendix B, Section B2.5.4 and Figure B2.5.4-5 using 2006-2010 American Community Survey data.

U.S. Highway 77 borders block groups with significant Hispanic populations in Refugio County and in the city of Victoria (Figure B2.5.4-5 in Appendix B), but it does not run through these areas. Section B5.8.3 addresses impacts on these Hispanic areas from the increased traffic on U.S. 77. Exelon notes that the areas on the other side of the highway from the Hispanic areas are non-Hispanic and that U.S. 77 has the capacity to absorb all the operations-related traffic.

**Associated EPA Revisions:**

Appendix B will be added to the VCS ER in a subsequent ER revision and is included on the compact disc provided as Enclosure 1.



**SE 5.11-1 (eRAI No.6511):****NRC Request**

SE 5.11-1 ESRP Section 5.11 directs the staff to review the applicant's impact information about cumulative projects occurring and proposed in the ROI and 8-County area presented in the ER. The section should be updated to include past, present, and reasonably foreseeable projects. Examples include, but are not limited to, the Eagle Ford shale oil/gas fracking, Caterpillar new plant/facility, Caterpillar downstream manufacturing facilities, Invista plant reconfiguration, Port of Victoria expansion, hotel and residential housing development, Port Comfort Plastics Plant, the potential new STP nuclear power plant, and other reasonably foreseeable major project workers in the ROI and 8-county area. Provide additional impact information about cumulative projects occurring and proposed in the ROI and 8-County area for ER Section 5.11.

**Response:**

In response to RAI 6431, Exelon has prepared a new Section 4.7, "Cumulative Impacts," which introduces a new list of projects that are potentially cumulative with the VCS project. This list of projects is intended to address all analyzed resource areas, including socioeconomics. Evaluation of these projects for cumulative impacts during the operations phase is addressed in the new Section 5.11, "Cumulative Impacts," prepared in response to RAI 6431. Therefore, the response to RAI 6511 SE-5.11-1 is contained in the response to RAI 6431, parts (a) and (b). Exelon's response to RAI 6431 will be provided to the NRC no later than July 23, 2012, in accordance with the 60 day timeframe requested in RAI Letter No. 10.

**Associated EPA Revisions:**

Updated ER Sections 4.7 and 5.11 will completely replace the current ER Revision 1 versions in a future EPA revision. The updated cumulative impacts sections will be provided in the RAI 6431 response, which will be submitted to the NRC no later than July 23, 2012, in accordance with the timeframe requested in NRC RAI Letter No.10.

**SE 5.11.2 (eRAI No.6511):****NRC Request**

SE-5.11.2 ESRP Section 5.11 directs the staff to review all of the applicant's correspondence and documentation of personal communications used to support the cumulative impact analysis presented in the ER. The projects that were considered in determining that cumulative impacts would be SMALL were very limited in ER Section 5.11. Provide copies of all correspondence and documentation of personal communications used to support the cumulative impact analysis presented in the ER, including, but not limited, to discussions with local government authorities on current or future activities/projects (public or private) in the vicinity of the VCS site for ER Section 5.11.

**Response:**

The new cumulative impacts analysis presented in response to RAI 6431 was performed using information obtained from public sources. However, on April 24, 2012, an Exelon representative met with the following individuals to corroborate the publically available information and inquire about new or changed conditions:

- President of Victoria Economic Development Corporation
- Vice President of College Advancement and External Affairs for Victoria College,
- Director of the Museum of the Coastal Bend
- President and CEO of the Victoria Chamber of Commerce
- Training Coordinator of the University of Houston-Victoria Small business Development Center
- Faculty member of the University of Houston-Victoria School of Business Administration
- Manager of the Holiday Inn Express
- Executive Director of the Victoria Riverside Park, Texas Zoo
- Victoria City Manager
- Mayor Pro Tem of the City of Victoria
- Executive Director of the Port of Victoria
- Fire Chief, City of Victoria
- Police Chief, City of Victoria
- An inspector of gas and oil drilling operations
- Various construction workers in the area

There are no written communications from these individuals.

**Associated ESPA Revisions:**

New Sections 4.7 and 5.11 will be added to the VCS ER in a subsequent ER revision and are attached to the response to RAI 6431. Exelon's response to RAI 6431 will be provided to the NRC no later than July 23, 2012, in accordance with the 60 day timeframe requested in RAI Letter No. 10.

## ATTACHMENT 21

### SUMMARY OF REGULATORY COMMITMENTS

(Exelon Letter to USNRC No. NP-12-0030, dated July 12, 2012)

The following table identifies commitments made in this document. (Any other actions discussed in the submittal represent intended or planned actions. They are described to the NRC for the NRC's information and are not regulatory commitments.)

COMMITMENT	COMMITTED DATE	COMMITMENT TYPE	
		ONE-TIME ACTION (Yes/No)	Programmatic (Yes/No)
Appendix B will be added to the VCS ER in a subsequent ER revision.  [RAI SE 2.5.1-1 (6461) Response]	March 31, 2013	Yes	No
ER Subsections 4.4.2.2.2 and 5.8.2.2.2 will be modified in a future ESPA revision to correct language regarding the Victoria and Refugio ISDs.  [RAI SE 2.5.2.8-2 (6461) Response]	March 31, 2013	Yes	No
The Expenditures for Construction Goods and Services discussion provided in ER Subsection 4.4.2.2.2, Taxes, will be revised in a future ESPA revision to correct the values presented therein.  [RAI SE 4.4.2-2 (6462) Response]	March 31, 2013	Yes	No

## ENCLOSURE 1

**CD titled:**

**Victoria County Station  
Early Site Permit Application, Part 3, Environmental Report,  
RAI 6461, 6462, 6510, and 6511 Responses, ER Appendix B**

**NP-12-0030, Enclosure 1  
July 2012**

**CD contents:**

1. Document: "Part 1 Final Appendix B – NRC"
2. Document: "Part 2 Final Appendix B – NRC"
3. Folder titled "Appendix B References", containing the following:
  - a. Subfolder titled "B2.5.1" containing the following files:

Filename
Texas State Data Center 2008.pdf
TOG 2011.pdf
USCB 2010a - 2010 populations.pdf
USCB 2010b - 2006-2010 DP-5.pdf
USCB 2010c DPO1 Seasonal Housing.pdf
USCB 2010d (DP-1, MSAs).pdf

- b. Subfolder titled "B4.4.2" containing the following files:

Filename
BEA 2011 - CA1-3 Personal Income.pdf
BLS 2011 - OES nuclear.pdf
BLS 2012 - QCEW.pdf
USCB 2010 - DP05.pdf

c. Subfolder titled "B2.5.2" containing the following files:

Filename	Filename
AMA 2011.pdf	TCEQ 2012 - Water Systems.pdf
AN 2012.pdf	TCPA 2010 - Summary of County Expenditures.pdf
Aransas Pass 2012- Community and Newbury Parks.PDF	TCPA 2012a - City Sales and Use Tax Rates.pdf
BEA 2011a - CA25N all juris.pdf	TCPA 2012c - Sales and Use Tax.pdf
BEA 2011b - CA05N PCI.pdf	TDI 2012 Fire PPCs.pdf
BEA 2011c - SA1-3 USA.pdf	TEA 2010 ISD Financial Data.pdf
Beeville 2006 - Parks.PDF	Tetra Tech 2012a.pdf
BLS 2011a - Metro and Nonmetro Occup.pdf	Tetra Tech 2012b.pdf
BLS 2011b - May 2010 TX all occupations.pdf	Texas Coastal Bend 2011 - Sinton Parks.PDF
BLS 2012a - LAUS.pdf	TOG 2011 Hotel Data.pdf
BLS 2012b - Labor Stats fr CPS.pdf	TPWD 2012a Matagorda Island WMA.PDF
BLS 2012c - QCEW.pdf	TPWD 2012b Guadalupe Delta WMA.PDF
BLS 2012d - Inflation Calculator.pdf	TPWD 2012c Aransas NWR.PDF
BRC 2012.pdf	TPWD 2012d Welder Flats WMA.PDF
Coastal Bend Texas 2011.PDF	TPWD 2012e Goliad State Park.PDF
Cuero 2012.pdf	TPWD 2012f Goose Island State Park.PDF
FAA 2012.pdf	TPWD 2012g Lake Texana State Park.PDF
FBI 2011a -Table 80.pdf	TSTC Jun 2008.pdf
FBI 2011b - Table 78.pdf	TWDB 2012.pdf
Fishbeck 2012a TPWD, State Parks.PDF	TXDOT 2010 - District Traffic Maps.pdf
Fishbeck 2012b TPWD, State Parks.PDF	USACE 2006.pdf
GBRA 2010 - Coletto Creek Park.PDF	USACE 2007.pdf
GCC 2012 - Fannin Plaza Park.PDF	USACE 2008.pdf
Heysquierdo 2012 Port Lavaca Parks.PDF	USACE 2009.pdf
Ingleside 2009 - Ingleside Parks.PDF	USCB 2010a - Housing DP04.pdf
JCCCA 2012- Parks.PDF	USCB 2010b - DP05.pdf
Morales 2012 Palacios Parks.PDF	USEPA 2010.pdf
NCES 2012 Colleges Search.pdf	USEPA 2011.pdf
Nelson 2012 TPWD, visitor useage of WMAs.PDF	USFA 2011 - edited.pdf
Nix 2012 ANWR.PDF	VCA 2010 - 2010 CAFR.pdf
Pursell 2012.pdf	VCTX 2012.pdf
Refugio Co 2012 - Parks.PDF	VEDC 2012 - Major Empl.pdf
Rockport 2012a - Rockport Beach Park.PDF	Victoria 2012 - City of Victoria General Fund 11-12.pdf
Rockport 2012b.pdf	Victoria Parks 2012 - Parks.PDF
South Texas Travel 2012 - Lighthouse Beach and Bird Sanctuary.PDF	Yoakum 2010 - MajorEmployers.pdf
State Parks 2012 Fannin Battleground.PDF	Yoakum 2012 - Yoakum Parks.PDF
TAOC 2011a - Texas Total County Property Tax Rates 1996 - 2010.pdf	YoakumUSA 2012.pdf
TAOC 2011b - County Property Taxes.pdf	

- d. Subfolder titled "B5.8.2" containing the following files:

Filename
BEA 2011 - CA1-3 Personal Income.pdf
BLS 2011 - OES nuclear.pdf
BLS 2012 - QCEW.pdf
TCPA 2011 - Texas Net Revenue by Source.pdf
USCB 2010 - DP01.pdf

- e. Subfolder titled "B9.3.3" containing the following files:

Filename
BLS 2011 - LAUS all jurisdictions.pdf
BLS LAUS 2011 all counties.xls
FBI 2010a — Table 80 - Texas.pdf
FBI 2010b — Table 78 - Texas.pdf
FBI 2010c — Table 77.pdf
NCES 2012.pdf
TAOC 2010.pdf
USCB 2010a DP04.pdf
USCB 2010b DP05.pdf
USCB 2010c - DP05.pdf
USFA 2012.pdf
USNRC 2011 - STP FEIS.pdf