

Mendiola, Doris

Subject: FW: FENOC Comments on Davis-Besse Draft Supplemental Environmental Impact Statement
Attachments: L-14-146 DSEIS Comments_2014-04-21.pdf

From: Dort, Steven R. [mailto:dorts@firstenergycorp.com]
Sent: Monday, April 21, 2014 2:00 PM
To: Keegan, Elaine; Bladey, Cindy
Cc: Uribe, Juan; Custer, Clifford I
Subject: FENOC Comments on Davis-Besse Draft Supplemental Environmental Impact Statement

Ms. Keegan / Ms. Bladey,

Attached is a copy of a letter providing the FirstEnergy Nuclear Operating Company (FENOC) comments on Draft NUREG-1437 Supplement 52, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants, Supplement 52, Regarding Davis-Besse Nuclear Power Station. An overnight hard copy has been sent to the NRC Document Control Desk and to Ms. Bladey. Ms. Keegan will also receive a cc copy in the next several days.

Should you have any questions regarding the FENOC comments, please contact Mr. Cliff Custer or me.

Thank you,

Steven Dort
FENOC License Renewal

3/7/2014
79 FR 13079

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RULES AND DIRECTIVES
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Template = ADM - 013
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Add= E. Keegan (enk)

Raymond A. Lieb
Vice President, Nuclear419-321-7676
Fax: 419-321-7582April 21, 2014
L-14-146

10 CFR 54

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

Davis-Besse Nuclear Power Station, Unit No. 1
Docket No. 50-346, License Number NPF-3
Review of Draft Plant-Specific Supplement 52 to the Generic Environmental Impact
Statement for License Renewal of Nuclear Plants Regarding Davis-Besse Nuclear
Power Station, Unit 1 (TAC No. ME4613)

By letter dated August 27, 2010 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML102450565), FirstEnergy Nuclear Operating Company (FENOC) submitted an application pursuant to Title 10 of the *Code of Federal Regulations*, Part 54 for renewal of Operating License NPF-3 for the Davis-Besse Nuclear Power Station, Unit No. 1 (Davis-Besse). By letter dated February 24, 2014 (ML14050A078 (LTR), ML14050A523 (PKG), ML14050A521 (FRN)), the Nuclear Regulatory Commission (NRC) issued the Notice of Availability of Draft Plant-Specific Supplement 52 to the Generic Environmental Impact Statement for License Renewal of Nuclear Plants Regarding Davis-Besse Nuclear Power Station, Unit 1.

FENOC has completed its review of Draft Plant-Specific Supplement 52 to the Generic Environmental Impact Statement for License Renewal of Nuclear Plants Regarding Davis-Besse Nuclear Power Station, Unit 1. The Enclosure provides FENOC comments on the document.

There are no regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Clifford I. Custer, Fleet License Renewal Project Manager, at 724-682-7139.

Sincerely,


Raymond A. Lieb

Davis-Besse Nuclear Power Station, Unit No. 1
L-14-146
Page 2

Enclosure:

FirstEnergy Nuclear Operating Company (FENOC) Comments Related to Draft
Plant-Specific Supplement 52 to the Generic Environmental Impact Statement for
License Renewal of Nuclear Plants Regarding Davis-Besse Nuclear Power
Station, Unit 1 (DSEIS)

cc: Ms. Cindy Bladey, Chief, Rules, Announcements, and Directives Branch
NRC DLR Environmental Project Manager
NRC DLR Project Manager
NRC Region III Administrator

cc: w/o Enclosure
NRC DLR Director
NRR DORL Project Manager
NRC Resident Inspector
Utility Radiological Safety Board

Enclosure

Davis-Besse Nuclear Power Station, Unit No. 1 (Davis-Besse)

Letter L-14-146

**FirstEnergy Nuclear Operating Company (FENOC) Comments Related to
Draft Plant-Specific Supplement 52 to the
Generic Environmental Impact Statement for License Renewal of Nuclear Plants
Regarding Davis-Besse Nuclear Power Station, Unit 1 (DSEIS)**

14 pages follow

**FirstEnergy Nuclear Operating Company (FENOC) Comments
Related to Draft Plant-Specific Supplement 52 to the
Generic Environmental Impact Statement for License Renewal of Nuclear Plants
Regarding Davis-Besse Nuclear Power Station, Unit 1 (DSEIS)**

L-14-146
Page 1 of 14

Item No.	DSEIS Section	DSEIS Page / Line(s)	Comment
1.	General Comment	--	Although the DSEIS discusses the revised GEIS and the related final rule, FENOC believes that the discussion should be further clarified to confirm that, as applicable to Davis-Besse, the NRC has considered each of the Category 1 issues in the revised rule and determined that there is no new and significant information and the Category 1 determinations remain valid for Davis-Besse and/or provided a justification for any differences between what is in the DSEIS versus what is in the revised GEIS/final rule.
2.	Abstract	iii / Lines 9-10	FENOC notes that the description of the combinations alternative on this page does not match the similar description on page xix, Line 7.
3.	Executive Summary	xv / Line 5	FENOC suggests changing "Nuclear Power <u>Plant</u> " to "Nuclear Power <u>Station</u> ".
4.	Executive Summary	xvi / Line 30	FENOC recommends changing " <u>is</u> " to " <u>are</u> ", since the topic is "environmental impacts".
5.	Executive Summary 1.5	xix	The DSEIS concludes that its " <u>preliminary recommendation is that the adverse environmental impacts of license renewal for Davis-Besse are not great enough to deny the option of license renewal for energy-planning decisionmakers.</u> " Consistent with 10 CFR § 51.95(c)(4) and Section 9.4 of the DSEIS, this conclusion should be revised to read as follows: " <u>the adverse environmental impacts of license renewal are not so great that preserving the option of license renewal for energy planning decision makers would be unreasonable.</u> "
6.	Abbreviations & Acronyms	xxii	FENOC suggests that the word "million" following MMBtu should be in the right-hand column in front of "British thermal unit".

FENOC Comments Related to Draft DSEIS

L-14-146

Page 2 of 14

Item No.	DSEIS Section	DSEIS Page / Line(s)	Comment
7.	1.4 Appendix B	1-4 / Lines 10-13 B-1 / last paragraph	<p>This background sentence on the 2013 rulemaking states that the new Category 1 issues set forth in the revised GEIS and Part 51 rules "include geology and soils, exposure of terrestrial organisms to radionuclides, exposure of aquatic organisms to radionuclides, human health impact from chemicals, and physical occupational hazards." A similar statement appears in Appendix B.</p> <p>This list does not appear to be comprehensive. The final rule (78 Fed. Reg. at 37,283) states: "New Category 1 issues were added: geology and soils; effects of dredging on surface water quality; groundwater use and quality; exposure of terrestrial organisms to radionuclides; exposure of aquatic organisms to radionuclides; effects of dredging on aquatic organisms; impacts of transmission line right-of-way management on aquatic resources; employment and income; tax revenues; human health impacts from chemicals; and physical occupational hazards." and "Several issues were changed from Category 2 to Category 1: Offsite land use, air quality, public services (several issues), and population and housing."</p> <p>FENOC requests that the DSEIS be revised to add all of the new Category 1 issues to this background sentence or to specifically clarify that this sentence is not intended to be comprehensive or to match the scope of new issues evaluated in the DSEIS.</p> <p>Relatedly, and as proposed below regarding the substantive evaluations in Chapters 3 and 4, FENOC wants to ensure that all new Category 1 issues are fully and clearly addressed, or a justification be included for those not otherwise addressed in the DSEIS.</p>

FENOC Comments Related to Draft DSEIS

L-14-146

Page 3 of 14

Item No.	DSEIS Section	DSEIS Page / Line(s)	Comment
8.	1.4 Appendix B	1-4 / Lines 13-15 B-1 / last paragraph	<p>This background sentence on the 2013 rulemaking states that “Radionuclides released to groundwater, effects on terrestrial resources (non-cooling system impacts), minority and low-income populations (i.e., environmental justice), and cumulative impacts were added as new Category 2 issues.”</p> <p>This list appears to be inconsistent with the final rule (78 Fed. Reg. at 37,283), which states: “New Category 2 issues were added: Radionuclides released to groundwater, water use conflicts with terrestrial resources, water use conflicts with aquatic resources, and cumulative impacts.” and “One uncharacterized issue was reclassified as Category 2: Environmental justice/minority and low-income populations.”</p> <p>FENOC requests that the DSEIS be revised to include all of the new Category 2 issues to this background sentence or to specifically clarify that this sentence is not intended to be comprehensive.</p>
9.	1.4	1-4 / Lines 16-22	<p>This paragraph discusses the effectiveness of the final rule with regard to the new or revised Category 1 and 2 issues, and explains that the NRC must consider them. FENOC recommends that the NRC add a brief discussion providing additional details, explaining how the NRC considered the Category 1 and 2 issues.</p>
10.	1.5	1-6 / Lines 6-7	<p>Similar to Comment 5, above, the sentence should be revised to read as follows: “... <u>Commission that the adverse environmental impacts of license renewal are not so great that preserving the option of license renewal for energy planning decision makers would be unreasonable.</u>”</p>
11.	1.10	1-9 / Line 5	<p>FENOC suggests changing “<u>Accession Nos.</u>” to the singular “<u>Accession No.</u>”.</p>
12.	2.0	2-1 / Lines 2 & 5	<p>FENOC suggests removing the extra spaces (25 mi) (40 km) (2500 m) in lines 2 & 5. Also, the statement “[a]pproximately 700 ac (300 ha) are marshland...” is the only location in the DSEIS where 700 ac is used; elsewhere, the statement “approximately 733 ac” is used multiple times. Recommend using “approximately 733 ac” throughout the DSEIS.</p>

FENOC Comments Related to Draft DSEIS

L-14-146

Page 4 of 14

Item No.	DSEIS Section	DSEIS Page / Line(s)	Comment
13.	2.1 2.1.1	2-1 / Line 19, 2-6 / Line 9	FENOC recommends the use of 908 megawatts-electric (MWe) instead of 913 MWe in the DSEIS, to be consistent with the License Renewal Application and Environmental Report. The reference cited on page 2-6, Line 11 (i.e., FENOC 2010c), is the License Renewal Application, which lists electrical output as "908 MWe". Also, 908 MWe is used later in the DSEIS for the comparison of Alternatives.
14.	2.1.1	2-6 / Line 17	The sentence states that each primary coolant loop contains one reactor coolant pump, but Davis-Besse has two reactor coolant pumps per loop. FENOC recommends changing Line 17 from "... <u>one reactor coolant pump</u> ," to "... <u>one or two (depending on the plant design) reactor coolant pumps</u> ,".
15.	2.1.2.3	2-10 / Lines 12, 17 & 27 2-11/ Line 26	FENOC suggests revising the 3 cited references (FENOC 2011) on this page to be consistent with the references Section 2.4, which lists the references as FENOC 2011a, 2011b, or 2011c. Same comment for page 2-11, line 26 (FENOC 2010), which has no alpha character (a, b, c or d) following the year.
16.	2.2.1	2-18 / Line 19	The Magee Marsh Wildlife Area entrance is approximately 6 miles west of the station. Lake Erie is east of the station. FENOC recommends revising Line 19 to read, "The Navarre Marsh partially surrounds the station to the north, east and southeast."
17.	2.2.2.1	2-21 / Line 15	Regarding the sentence, " <u>Davis-Besse has many sources of criteria pollutants and HAPs to include the following:</u> ", FENOC recommends changing the sentence to read: " <u>The Davis-Besse sources of criteria pollutants and HAPS are as follows:</u> " As currently written, the sentence suggests there are more sources than those listed.
18.	2.2.2.1	2-21 / Line 44	FENOC requests that, at the beginning of the sentence at the end of the Line, NRC consider adding " <u>However,</u> " in front of "In 1992, Davis-Besse..." to make it clear that the previous discussion of fires and the chemicals released during transformer fires didn't apply in this case.
19.	2.2.4	2-27 / Line 12	FENOC recommends changing " <u>August 14, 2006</u> " to " <u>July 1, 2011</u> " to align with the new permit date and the suggested update to Appendix C, below.

FENOC Comments Related to Draft DSEIS

L-14-146

Page 5 of 14

Item No.	DSEIS Section	DSEIS Page / Line(s)	Comment
20.	2.2.4	2-28 / Line 23	FENOC recommends deleting " <u>asbestos</u> ", because the updated permit does not require monitoring for asbestos.
21.	2.2.4	2-28 / Line 25	FENOC recommends changing or deleting the reference source cited (Brown 2010) since there is no corresponding reference citation in the references list in Section 2.4.
22.	2.2.4	2-29 / Line 7	FENOC recommends changing "2006" to " 2011 " to align with the new permit date, a previous comment and the suggested update to Appendix C, below.
23.	2.2.4	2-29 / Lines 16-18	The use of the terms "violate" with respect to NPDES requirements and "NOV" (Notice of Violation issued by a regulator e.g., OEPA) are confusing when used interchangeably in the first two sentences. The statements need to be clear that site personnel may indicate an action, lack of action, or parameter may have exceeded ("violated") permit requirements, but there were no formal NOV's issued for the cases described where FENOC exceeded permit requirements for a period of time. FENOC recommends changing " <u>NOV</u> " on line 17 to " <u>violations</u> ".
24.	2.2.4	2-29 / Lines 26-27	The change has been submitted and approved, and zinc acetate is being used, so FENOC recommends revising the last sentence to be past tense.
25.	2.2.5	2-31 / Line 4	FENOC recommends changing the sentence to read, "...December 2010 at <u>monitoring</u> wells 30S...".
26.	2.2.5	2-33 / Lines 13-14	FENOC recommends changing " <u>Ce-137</u> " to " <u>Cs-137</u> " and " <u>Ce-134</u> " to " <u>Cs-134</u> ". Also, the cited reference (NRC 1991) is not included in the list of references in Section 2.4, page 2-87.
27.	2.2.5	2-33 / Line 30	FENOC recommends changing " <u>sodium hydroxide</u> " to " <u>sodium hypochlorite</u> ".
28.	2.2.8.3	2-49 / Line 13	FENOC suggests that the reference to " <u>Table 2.3-8</u> " in this line should instead be " <u>Table 2.2-8</u> ."
29.	2.2.8.4	2-52 / Line 6	FENOC suggests that the reference to " <u>Section 2.2.6</u> " in this line should instead be " <u>Section 2.2.7.2</u> ."
30.	2.2.9.2	2-59 / Line 10	FENOC suggests underlining and separating the heading "Transportation" in a manner similar to the formatting of the previous heading "Education".

FENOC Comments Related to Draft DSEIS

L-14-146

Page 6 of 14

Item No.	DSEIS Section	DSEIS Page / Line(s)	Comment
31.	2.2.9.5	2-60 / Line 42	A space is needed between the first two words in the line.
32.	2.2.9.5	2-65 / Line 11	The word "temporary" is missing the letter "t".
33.	2.2.9.6	2-67 / Line 12	There is an errant comma following the word "of".
34.	2.2.10.1	2-69 / Lines 21-22	FENOC recommends rewording the following sentence as shown: "One documented fluted projectile point is located was discovered at the Peters site in Ottawa County, south of Davis-Besse along the Portage River was discovered (Prufer and Shane 1973)."
35.	2.2.10.1	2-71 / Line 23	FENOC recommends changing " <u>north</u> " to " <u>northwest</u> ", because the Maumee River runs from the southwest to the northwest of Davis-Besse.
36.	2.2.10.2	2-72 / Line 40	The Magee Marsh is approximately 6 miles west of Davis-Besse. FENOC recommends adding a period after "...agricultural purposes" and deleting the remainder of the sentence.
37.	2.4	2-74 to 2-76 / various Lines	Many of the titles for the Code of Federal Regulations citations are incorrect or duplicated. Examples include 10 CFR Part 60, Part 70, 15 CFR Part 930 has multiple citations bundled together, 40 CFR Part 80, 40 CFR Part 239, etc. FENOC recommends verifying the titles for these citations in this section and in the other references sections of the DSEIS.
38.	2.4	2-79 Line 24	FENOC suggests that the title of this document reference should read, "Loggerhead Shrike: <u>First Ever</u> Captured...".
39.	2.4	2-82 Line 37	FENOC recommends deleting the "(2010b)" at the end of the reference to be consistent with the other FENOC 2010 citations.
40.	2.4	2-83 / Lines 15-19 and Line 20	This FENOC 2011 citation appears to be out of chronological order and should be located between lines 11 and 12. On line 20, [FENCO] should read [FENOC].

FENOC Comments Related to Draft DSEIS

L-14-146

Page 7 of 14

Item No.	DSEIS Section	DSEIS Page / Line(s)	Comment
41.	Chapters 3 & 4	All	<p>Although these substantive chapters evaluating the environmental impacts of refurbishment and operation appear to address most of the new issues in the June 20, 2013 final rule that revised Table B-1, it is not clear whether each individual issue has been addressed.</p> <p>For example, it does not appear to be clearly stated whether the following Category 1 issues are applicable to Davis-Besse and, if so, how they are addressed: effects of dredging on surface water quality, groundwater quality degradation resulting from water withdrawals, effects of dredging on aquatic organisms, and impacts of transmission line ROW management on aquatic resources.</p> <p>Therefore, FENOC recommends that the NRC include a discussion in this chapter, or elsewhere in the SEIS, to provide an explanation of how the Category 1 issues in the new final rule have been addressed, or, in the alternative, to provide a justification for any differences between what is in the DSEIS versus what is in the revised GEIS/final rule.</p>
42.	3.1	3-3 / Lines 5 & 6	<p>There are numerous references in Chapters 3 & 4 to replacement of the steam generators and that these activities "<i>will be performed during an extended outage scheduled for the spring of 2014</i>" (e.g., Pg 3-3, lines 17-20). At the time of this review, both steam generators have been replaced and the 2014 refueling outage is nearing completion. Consider changing the tense for steam generator replacement to past tense, although FENOC realizes that this change would impact many pages and sections of the DSEIS.</p>
43.	3.2.1	<p>3-4 / Line 33</p> <p>3-5 / Line 1</p>	<p>FENOC is an entity. FENOC recommends changing the sentence from "FENOC noted in <u>their</u> ER that..." to "FENOC noted in <u>its</u> ER that...". This issue appears in multiple locations (at least 8 instances) in the DSEIS (see Chapter 4 for more examples).</p> <p>Similarly, FENOC recommends changing the statement in Line 1 on the next page from "FENOC's procedures require <u>them</u> to coordinate with the FWS..." to "FENOC's procedures <u>require coordination</u> with the FWS..."</p>
44.	3.2.8	3-9 / Line 7	<p>FENOC recommends changing "<i>Environmental Procedure</i>" to "<i>Environmental Evaluations procedure</i>" to match the title of the procedure.</p>

FENOC Comments Related to Draft DSEIS

L-14-146

Page 8 of 14

Item No.	DSEIS Section	DSEIS Page / Line(s)	Comment
45.	4.7.3	4-8 / [No line numbers]	FENOC recommends deleting one of the uses of the word "vicinity" in the 2 nd paragraph, 1 st sentence.
46.	4.9.1	4-13 / [No line numbers]	The first sentence begins with an errant period.
47.	4.14	4-30 & 4-31	FENOC requests that the DSEIS be revised to include an affirmative statement in this section clarifying that the NRC has reviewed the Category 1 issues in Table B-1, as revised in the June 20, 2013 final rule, and has determined that, to the extent such topics are applicable to Davis-Besse, there is no new and significant information, and therefore the Category 1 designations for these issues remain correct and the small impact designations in Table B-1 remain correct. Alternatively, the SEIS should provide a justification for any differences between what is in the DSEIS versus what is in the revised GEIS/final rule.
48.	Table 4.15-1	4-32 & 4-33	<p>At the bottom of page 4-32, the first project listed under "Energy Projects" is the '<i>Independent Spent Fuel Storage Installation on Davis-Besse site; dry spent-fuel storage</i>'. It is not clear why the Status discusses Spent Fuel Pool and transfer pit storage versus the dry fuel storage pad and current dry fuel storage capability.</p> <p>On page 4-33, the 3rd PROJECT/ACTION listed (Toledo Refinery Substation Project), the LOCATION description ends abruptly... "Oregon, Ohio, near the intersection of".</p>
49.	4.15.5.2	4-43 / Line 20	The sentence at the end of the second paragraph in this section is not complete and has no period.

FENOC Comments Related to Draft DSEIS

L-14-146

Page 9 of 14

Item No.	DSEIS Section	DSEIS Page / Line(s)	Comment
50.	5.3.1 5.3.3 F.1	5-3 / Lines 23 & 33 5-6 / Lines 12, 21 F-1 / Line 18 F-2 / Lines 4-23	In response to NRC requests for additional information (RAIs), the total number of SAMAs was changed from 167 to 168, and the number of SAMAs eliminated based on screening was changed from 152 to 153. (see ADAMS Accession No. ML11180A233 [FENOC Letter L-11-154 dated June 24, 2011], RAI 5.c). This comment also applies to Appendix F, Section F.1 (page F-1). However, since this Appendix is written chronologically, FENOC recommends adding the following bullet to page F-2 under the list of FENOC provided information via letter dated June 24, 2011: <u>- identification of a new SAMA candidate (OT-9R), which changed the total number of SAMA candidates evaluated to 168 instead of the original 167.</u>
51.	5.3.1	5-3 / Lines 35-36	FENOC suggests adding the text in bold/underline: "In the third step, FENOC estimated the benefits and the costs associated with each of the <u>15 candidate</u> SAMAs."
52.	5.3.2	5-4 / Line 29	The text states: "Column totals in Table <u>5.3-2</u> may differ due to round off." The table reference appears to be incorrect. The correct reference is Table <u>5.3-1</u> .
53.	5.3.2 F.2.1	5-5 / Table 5.3-1 F-4 / Table F-1	FENOC recommends clarifying the following two initiating event descriptions: From: "Flooding in CCW pump room" To: "Flooding in CCW pump room <u>from SW</u> " [or, <u>Service Water</u>] and, From: "Flooding in turbine building" To: "Flooding in turbine building <u>from Circ water</u> " Also, consider noting that the % contribution to CDF values are slightly different from those reported in FENOC Environmental Report Table E.3-1 due to rounding. Comment also applies to Appendix F, Section F.2.1, Table F-1.

FENOC Comments Related to Draft DSEIS

L-14-146

Page 10 of 14

Item No.	DSEIS Section	DSEIS Page / Line(s)	Comment
54.	5.3.2 F.2.1	5-5 / Table 5.3-2 F-5 / Table F-2	FENOC recommends that the Population Dose and % Contribution be updated to match those included in FENOC Letter L-12-244 dated July 16, 2012 (see Table E.3-21). Comment also applies to Appendix F, Section F.2.1, Table F-2.
55.	5.3.5	5-7 / Lines 13-14	Suggest adding the text in bold/underline: "FENOC's derivation of each of the associated costs is summarized in Appendix E <u>of the ER</u> ."
56.	6.2.1.2	6-5 / Lines 19-21	The DSEIS states that the various studies it reviewed show that "the relatively lower order of magnitude of GHG emissions from nuclear power, when compared to fossil-fueled alternatives (especially natural gas), <i>could potentially disappear if available uranium ore grades drop sufficiently . . .</i> " (Emphasis added.) This statement is speculative, apparently based on worst-case assumptions, and a review of the data presented in Table 6.2-2 reveals it to be unsupported. See, e.g., POST (2006) (referenced and described in Table 6.2-2). FENOC recommends deleting this sentence.
57.	6.2.2	6-8 / Lines 39-40	The DSEIS states that "[f]ew studies predict that nuclear fuel cycle emissions will exceed those of fossil fuels within a timeframe that includes the Davis-Besse period of extended operation." But none of the studies cited in Table 6.2-2 appear to support this thesis—at least based on the data presented. Therefore, FENOC suggests revising this sentence to state: " <u>Nearly all studies predict that nuclear fuel cycle emissions will remain an order of magnitude or more below those of all types of fossil fuels during the Davis-Besse period of extended operation.</u> "
58.	6.2.2	6-9 / Lines 8-9	The DSEIS concludes that " <u>it is likely that GHG emissions from renewable energy sources would be lower than those associated with Davis-Besse at some point during the period of extended operation.</u> " This conclusion appears to be unsupported by the data presented in Table 6.2-3. FENOC suggests revising this sentence to state that " <u>most of the relevant studies show that it is likely that GHG emissions associated with Davis-Besse will remain comparable to or below those from renewable energy sources throughout the period of extended operation.</u> "

FENOC Comments Related to Draft DSEIS

L-14-146

Page 11 of 14

Item No.	DSEIS Section	DSEIS Page / Line(s)	Comment
59.	8.0	8-3 / Line 30	FENOC recommends changing "... <u>FENOC</u> Service Company's..." to "... <u>FirstEnergy</u> Service Company's...."
60.	8.1	8-6 / Table 8.1-1	The conclusion that the air quality impacts of new natural gas combined cycle generation would be SMALL to MODERATE appears inappropriate, in that it blurs the significant difference between emissions from Davis-Besse and natural gas sources. See Table 6.2-2 (page 6-6). FENOC suggests that if the impacts from Davis-Besse are SMALL, then the impacts from natural gas facilities should logically be at least MODERATE, consistent with the Davis-Besse Environmental Report.
61.	8.1.5.1	8-12 / Line 17	FENOC suggests revising the acronym " <u>GGNS</u> " to read " <u>Davis-Besse</u> ".
62.	11.0 Appendix A	11-4 A-4 & A-173	FENOC recommends changing the name " <u>Nesser</u> " to " <u>Nusser</u> " in 3 locations. Nusser is the correct spelling according to the signature on the email included as page A-173.
63.	Appendix C	C-5 / Table C-2	Storage of spent nuclear fuel & high-level radioactive waste: STATUS – The word <u>Expired</u> should read " <u>Expires</u> ".
64.	Appendix C	C-5 / Table C-2	Permit to operate an air containment source: STATUS – should read as follows: Operation of station auxiliary boiler <u>Facility ID#: 0362000091</u> <u>Permit #: P0110436</u> <u>Issued: 02/28/2013</u> <u>Expires: 02/28/2023</u>
65.	Appendix C	C-5 & C-6 / Table C-2	NPDES Permit – Treatment of wastewater and effluent discharge to surface receiving waters (Toussaint River and Lake Erie): STATUS – the Ohio Permit No. should read <u>21B00011*JD</u> <u>Issued: 07/01/2011</u> <u>Expires: 04/30/2016</u>

FENOC Comments Related to Draft DSEIS

L-14-146

Page 12 of 14

Item No.	DSEIS Section	DSEIS Page / Line(s)	Comment
66.	Appendix C	C-6 / Table C-2	<p>Hazardous material registration:</p> <p>STATUS – should read as follows:</p> <p>Transportation of hazardous materials</p> <p>Permit Number: <u>052112 020 004UW</u></p> <p>Issued: <u>05/22/2012</u></p> <p>Expires: <u>06/30/2015</u></p> <p>(Renewed Triennially)</p>
67.	Appendix C	C-6 / Table C-2	<p>License to deliver radioactive waste:</p> <p>STATUS – should read as follows:</p> <p>Shipment of radioactive material to a licensed disposal-processing facility within the State of Tennessee</p> <p>Tennessee Delivery License</p> <p># T-OH003-L<u>14</u></p> <p>Issued: Annually</p> <p>Expires: 12/31/20<u>14</u></p>
68.	Appendix C	C-6 / Table C-2	<p>New Row:</p> <p><u>License to deliver radioactive waste:</u></p> <p>AGENCY – should read as follows:</p> <p><u>South Carolina Department of Health and Environmental Control</u></p> <p>AUTHORITY – should read as follows:</p> <p><u>South Carolina Radioactive Waste Transportation and Disposal Act No. 429 of 1980</u></p> <p>STATUS – should read as follows:</p> <p><u>Shipment of radioactive material to a licensed disposal-processing facility within the State of South Carolina</u></p> <p><u>Permit #: 0054-34-14</u></p> <p><u>Issued: 12/10/2013</u></p> <p><u>Expires: 12/31/2014</u></p>

FENOC Comments Related to Draft DSEIS

L-14-146

Page 13 of 14

Item No.	DSEIS Section	DSEIS Page / Line(s)	Comment
69.	Appendix C	C-6 / Table C-2	Underground storage tank registration: STATUS – should read as follows: <u>Certificate Facility # 62000072</u> <u>Expires: 06/30/2014</u>
70.	Appendix C	C-7 / Table C-2	X-ray generating equipment registration: STATUS – should read as follows: <u>Expires: 05/31/2014</u>
71.	Appendix C	C-7 / Table C-2	Scientific Collection Permit: STATUS – should read as follows: <u>Permit #: 15-112</u> <u>Issued: 03/16/2014</u> <u>Expires: 03/15/2015</u>
72.	Appendix E	E-8	The following FENOC letter is missing from the list of correspondence: <u>Letter L-12-244 from John C. Dominy, Davis-Besse Nuclear Power Station, Unit 1, Docket No. 50-346, License Number NPF-3, Correction of Errors in the Davis-Besse Nuclear Power Station, Unit No.1, License Renewal Application (TAC No. ME4613) Environmental Report Severe Accident Mitigation Alternatives Analysis, and License Renewal Application Amendment No. 29 (dated July 16, 2012)</u> FENOC notes that this same correspondence is listed in Appendix F, Section F.8 (References), page F-36, Lines 34-38 (FENOC 2012a). However, the ML number listed in Appendix F is a duplicate of the ML number for FENOC letter dated June 24, 2011. Also, FENOC was not able to find the document in ADAMS using various search terms (may not be available to the public).
73.	F.2.2	F-12 / Line 7	FENOC suggests inserting the word “are” as follows: “The Level 1 core damage sequences <u>are</u> grouped into core damage bins according to similarities in their impact on containment response.”

FENOC Comments Related to Draft DSEIS

L-14-146

Page 14 of 14

Item No.	DSEIS Section	DSEIS Page / Line(s)	Comment
74.	F.2.2	F-14 / Lines 14-17	FENOC suggests editing the quoted sentence as follows: "Data from 2006 through 2008 was <u>were</u> considered, but the 2006 data was <u>were</u> chosen because it was <u>they were</u> the most complete data set. Data from year 2008 was <u>were</u> considered unusable as it <u>they</u> contained too many missing long data -sequences of unusable data."
75.	F.2.2	F-14 / Lines 39-40	FENOC suggests adding to the following sentence the language in bold/underline: "In response to an NRC staff RAI, FENOC revised the Level 3 PRA to include <u>that portion of</u> the Canadian population <u>located within the 50-mi radius SAMA analysis region</u> (FENOC 2011)."
76.	F.3.1 F.7	F-17 / Line 34 F-35 / Lines 18 & 19	Same issue as Comment 49 [5.3.1]. Specifically, the total number of SAMAs was changed from 167 to 168, and the number of SAMAs eliminated based on screening was changed from 152 to 153. However, since Appendix F is written chronologically, FENOC recommends adding the following sentence after line 6 on page F-18 and after line 19 on page F-35: <u>In response to NRC RAIs, FENOC's initial list of 167 SAMA candidates was increased to 168, of which 153 were eliminated based on screening.</u>
77.	F.3.2	F-21 / Line 30	FENOC suggests editing the quoted sentence as follows: "In response to the RAIs, FENOC addressed the suggested lower cost alternatives and determined that they were either already implemented at Davis-Besse (b), not feasible (c), or not cost-beneficial (a, d, e, and f) (FENOC 2011)."
78.	F.5	F-27 / Line 27	The word " <u>applicant's</u> " should be " <u>applicants</u> ."