



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

May 4, 2015

Mr. Kenneth A. Westlake
NEPA Implementation Section
U.S. Environmental Protection Agency - Region 5
77 W. Jackson Blvd., Mail Code: E-19J
Chicago, IL 60604

**SUBJECT: NOTICE OF AVAILABILITY OF THE FINAL PLANT-SPECIFIC SUPPLEMENT 52
TO THE GENERIC ENVIRONMENTAL IMPACT STATEMENT FOR LICENSE
RENEWAL OF NUCLEAR PLANTS REGARDING DAVIS-BESSE NUCLEAR
POWER STATION, UNIT 1**

Dear Mr. Westlake,

The U.S. Nuclear Regulatory Commission has completed the final plant-specific Supplement 52 to NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants (GEIS)," regarding the renewal of operating license NPF-3 for an additional 20 years of operation for Davis-Besse Nuclear Power Station, Unit 1. Enclosed are bound copies of Volumes 1 and 2 and three CDs (containing both volumes) of the final Supplement 52.

Copies of final Supplement 52 to the GEIS were mailed or e-mailed to interested Federal and State agencies, industry organizations, interested groups, and members of the public. The final Supplement 52 to the GEIS was submitted to the Environmental Protection Agency (EPA) via e-NEPA on May 4, 2015. A copy of this document has also been placed in the U.S. Nuclear Regulatory Commission's (NRC) Public Document Room, One White Flint North, 11555 Rockville Pike, Rockville, Maryland 20852, and in the NRC Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible on the NRC's website at <http://www.nrc.gov/reading-rm/adams.html>. The ADAMS accession numbers for final Supplement 52 to the GEIS are ML15112A098 for Volume 1 and ML15113A187 for Volume 2.

Additionally, enclosed are NRC's responses to EPA's recommendations that were provided by letter dated April 10, 2014, during the public comment period on the draft Supplement 52 to the GEIS. These responses can also be found in Appendix A of Supplement 52.

K. Westlake

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If further information is required, please contact the NRC environmental project manager, Ms. Elaine Keegan, at 301-415-8517 or by e-mail at Elaine.Keegan@nrc.gov.

Sincerely,

/RA/

Brian D. Wittick, Chief
Projects Branch 2
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket No. 50-346

Enclosure:
As stated

cc w/encl: See next page

K. Westlake

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ADAMS Accession Nos:

1. Package: (ML15124A718)
2. Letter: (ML15070A586)
3. "Generic Environmental Impact Statement
for License Renewal of Nuclear Plants,
Supplement 52": (ML15112A098 – Volume 1)
(ML15113A187 – Volume 2)

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NRC's Responses to EPA Recommendations on the Supplement 52 to the GEIS

Comment 25-1-LR: The Draft SEIS identifies several resource areas with impact categories ranges as "SMALL to MODERATE," or "MODERATE to LARGE," including offsite impacts to terrestrial resources from refurbishment and impacts to historic archaeological resources from operation. There is little indication how the impacts to those resources could potentially increase from SMALL to MODERATE or from MODERATE to LARGE. For example, certain categories of impacts have clear and objective metrics that determine whether the site-specific impact is SMALL, MODERATE, or LARGE, such as Groundwater Use and Quality, page B-4.

Recommendation: EPA recommends the Final SEIS clarify how impacts to resources that are defined in a range could move from lesser significance to higher significance. For example, the metric for becoming a MODERATE impact to offsite terrestrial resources from refurbishment could be direct take of a certain number of acres or type of habitat. Further, NRC and the applicant should identify mitigation measures, including coordination with the Ohio Department of Natural Resources (ODNR) and the U.S. Fish and Wildlife Service (USFWS), to ensure that impacts are avoided or minimized and remain in the SMALL category. Mitigation measures should be specific; the Draft SEIS currently states "use of best management practices," but this is too general. The Final SEIS should identify which specific best management practices will be used, where appropriate. For impacts to resources that are described in a range of significance, an adaptive management approach to mitigation should be outlined in the Final SEIS and committed to in the license.

Response: *Impacts to resources affected by license renewal are defined in the License Renewal (LR) Generic Environmental Impact Statement (GEIS), NUREG-1437. The LR GEIS also explains how impacts could range from lesser significance to higher significance for each resource. As explained in Section 1.4 of the SEIS, impact levels were established for each environmental impact NEPA issue or resource based on the Council on Environmental Quality (CEQ) terminology for "significantly" (see 40 CFR 1508.27). The range or extent of the impact would depend on how much of the resource would be affected by license renewal and refurbishment activities. Generic environmental impact analyses in the LR GEIS combined with site-specific environmental impact analyses in the Davis-Besse SEIS constitute the NRC's NEPA analysis for license renewal.*

The NRC evaluates the impacts of license renewal using information provided by the licensee in its environmental report and information gathered from various agencies, experts, and the public. On the basis of this evaluation, the NRC may identify mitigation measures to reduce certain impacts. However, the NRC can only require a licensee to mitigate impacts of those actions that are within the NRC's statutory authority. Therefore, the NRC cannot impose mitigation measures that are not related to this statutory authority, i.e., to the public health and safety from radiological hazards or common defense and security. Other mitigation requirements may be imposed by other Federal and State agencies that have jurisdiction over affected resources. These mitigation requirements are often prerequisites for obtaining permits from these agencies. The NRC will not grant a renewed license unless the licensee has obtained all necessary permits for operations. No change was made to the SEIS in response to this comment.

Comment 25-2-TR: Section 3.2.1, *Terrestrial Resources - Refurbishment Impacts*, details several refurbishment activities, including two permanent storage facilities, one permanent multi-story office building, and several temporary facilities. The temporary facilities may include

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a permanent base concrete pad. The Draft SEIS states that all land disturbed for construction and refurbishment-related activities will be previously disturbed land, such as mowed areas, parking lots, or other paved surfaces. These activities will lead to an increase in impervious surfaces. As discussed in section 4.15.3, *Cumulative Impacts on Aquatic Resources*, urbanization and shoreline development are major stressors on the health of Lake Erie. Avoiding impacts to wetlands and reducing the amount of impervious surfaces along the lake help reduce this stress.

Recommendations: EPA has several recommendations regarding the construction of the permanent and temporary facilities on the Davis-Besse site.

- EPA encourages the applicant to site and organize construction projects to minimize impacts to surrounding habitats. It is unclear if the permanent base concrete pad for temporary facilities is even necessary, since it is only under consideration at this time. Any unnecessary permanent, impervious areas are discouraged.
- EPA recommends staggering construction schedules of the new facilities so that no additional habitat is directly disturbed. This could mean having one temporary laydown area that services the construction of new permanent facilities one at a time, reducing the amount of disturbed habitat.
- Any new buildings and surrounding areas should be designed to Leadership in Energy and Environmental Design (LEED) standards. If LEED standards are pursued, this information should be included in the Final SEIS. Any potential use of Energy Star appliances, EPA's WaterSense program, EPA's GreenScapes program, or other similar programs should be identified in the Final SEIS. These are important elements of reducing the overall environmental impact of the proposed project.

Response: *The refurbishment activities discussed in Chapter 3 of the SEIS have been completed. Additionally, these recommendations are outside of the statutory authority granted the NRC by the Atomic Energy Act of 1954, as amended. Nevertheless, the NRC has included EPA's recommendations for ways to further mitigate environmental impacts during refurbishment in Section 3.2.1 of the SEIS.*

Comment 25-3-OS: Based on the discussion above pertaining to the development of new permanent and temporary facilities on the Davis-Besse site, EPA understands that some parking lots will be used for new permanent or temporary facilities. The Draft SEIS does not state whether the parking lots will be permanently lost due to construction and, if so, where new parking will be located. If the parking lots are currently in use and slated for conversion to permanent or temporary facilities, new parking facilities would need to be constructed to compensate for lost parking.

Recommendation: The Final SEIS should identify which parking lots are slated for permanent conversion to permanent or temporary facilities and whether parking spaces will need to be compensated for in another area of the Davis-Besse site. Any resultant impacts should be disclosed and mitigated. If new parking facilities are required because of the new permanent and temporary refurbishment facilities, EPA recommends permeable pavement be used, reducing runoff and helping to improve the health of Lake Erie.

Response: *This commenter made a recommendation that FENOC consider where new parking lots will be located if current parking lots are lost to construction, and also the type of pavement to be used. Chapter 3 of the SEIS contains the discussion of the refurbishment activities that were originally identified in the application for license renewal that was submitted in 2010. All construction of permanent and temporary facilities related to refurbishment was performed within the developed industrial area of the site on previously-disturbed land. Additionally, all activities identified as refurbishment have been completed. The last of the refurbishment activities was completed during the spring 2014 refueling outage. However, this comment is actually outside of the scope of the Davis-Besse license renewal environmental review because it is recommending actions that are outside of NRC's statutory authority. The NRC does not have the authority to suggest the types of paving material to use or where to locate parking lots on plant sites. No new information was provided in this comment, and no changes were made to the SEIS because of this comment.*

Comment 25-4-AM: The Draft SEIS does not identify any air quality impacts as a result of the proposed refurbishment projects. While EPA recognizes that Ottawa County is an attainment area for all criteria pollutants, we expect construction equipment used during refurbishment activities to emit diesel emissions. The National Institute for Occupational Safety and Health (NIOSH) has determined that diesel exhaust is a potential occupational carcinogen, based on a combination of chemical, genotoxicity, and carcinogenicity data. In addition, acute exposures to diesel exhaust have been linked to health problems such as eye and nose irritation, headaches, nausea, asthma, and other respiratory system issues.

Recommendations: Although every construction site is unique, common actions can reduce exposure to diesel exhaust. EPA recommends that the applicant and NRC commit to the following actions during construction in the Final SEIS and license:

- Using low-sulfur diesel fuel (15 parts per million sulfur maximum) in construction vehicles and equipment.
- Retrofitting engines with an exhaust filtration device to capture diesel particulate matter before it enters the construction site.
- Positioning the exhaust pipe so that diesel fumes are directed away from the operator and nearby workers, thereby reducing the fume concentration to which personnel are exposed.
- Using catalytic converters to reduce carbon monoxide, aldehydes, and hydrocarbons in diesel fumes. These devices must be used with low sulfur fuels.
- Ventilating wherever diesel equipment operates indoors. Roof vents, open doors and windows, roof fans, or other mechanical systems help move fresh air through work areas. As buildings under construction are gradually enclosed, remember that fumes from diesel equipment operating indoors can build up to dangerous levels without adequate ventilation.
- Attaching a hose to the tailpipe of diesel vehicles running indoors and exhaust the fumes outside, where they cannot re-enter the workplace. Inspect hoses regularly for defects and damage.
- Using enclosed, climate-controlled cabs pressurized and equipped with high efficiency particulate air (HEPA) filters to reduce the operators' exposure to diesel

fumes. Pressurization ensures that air moves from inside to outside. HEPA filters ensure that any incoming air is filtered first.

- Regularly maintaining diesel engines, which is essential to keep exhaust emissions low. Follow the manufacturer's recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance. For example, blue/black smoke indicates that an engine requires servicing or tuning.
- Reducing exposure through work practices and training, such as turning off engines when vehicles are stopped for more than a few minutes, training diesel-equipment operators to perform routine inspection, and maintaining filtration devices.
- Purchasing new vehicles that are equipped with the most advanced emission control systems available.
- Using electric starting aids such as block heaters with older vehicles to warm the engine reduces diesel emissions.
- Using respirators, which are only an interim measure to control exposure to diesel emissions. In most cases, an N95 respirator is adequate. Workers must be trained and fit-tested before they wear respirators. Depending on work being conducted, and if oil is present, concentrations of particulates present will determine the efficiency and type of mask and respirator. Personnel familiar with the selection care and use of respirators must perform the fit testing. Respirators must bear a NIOSH approval number. Never use paper masks or surgical masks without NIOSH approval numbers.

Response: *The commenter states that the Draft SEIS did not identify air quality impacts due to the proposed refurbishment activities associated with license renewal. The published Draft SEIS discussed potential air quality impacts from refurbishment activities in Sections 3.2.10 and 4.2 of the SEIS. Section 3.2.10 of the SEIS identifies that main contributors to air quality impacts associated with completed and ongoing refurbishment activities would be fugitive dust generation from facility construction activities, refurbishment work to open the shield building and containment vessel to replace the steam generators and related equipment, and exhaust emissions from motorized equipment and vehicles of temporary workers. Furthermore, as concluded in Section 3.2.10, estimated vehicle exhaust emissions from the additional needed workforce would not exceed de minimis levels. Since the screening analysis presented in Section 3.2.10 did not exceed the de minimis levels, a conformity determination is not required and it is unlikely that emissions from refurbishment activities would have affected a nonattainment or maintenance area or cause or contribute to any new violation of National Ambient Air Quality Standards.*

The commenter is also concerned about the exposure of diesel exhaust during refurbishment activities involving construction equipment and identifies actions the NRC and applicant should commit to, to mitigate impacts from diesel exhaust exposure. Based on its limited statutory authority under the Atomic Energy Act, NRC cannot impose mitigation measures or standards on its nuclear power plant licensees that are not related to public health and safety from radiological hazards or common defense and security. These actions and recommendations identified are outside the NRC's statutory authority. Nevertheless, licensees are required to comply with all applicable Federal, State, and local permit requirements relevant to their activities. Chapter 3 of the SEIS describes the activities that the licensee identified in the ER as refurbishment activities but have subsequently been completed in the years since the ER was

submitted in 2010. The last of the activities identified as refurbishment, steam generator replacement, was completed during the spring 2014 refueling outage.

No new information is presented in this comment. Therefore, no changes were made to the SEIS as a result of this comment.

Comment 25-5-AQ: The Draft SEIS references two “areas of concern” near Buffalo and the Ashtabula River on page 2-34, lines 12-16 and the lakewide management plan (LaMP) for Lake Erie. The Draft SELS (sic) does not, however, state that Davis-Besse (sic) is within the EPA-designated Maumee River Area of Concern (AOC), which was extended in 1992 to include the Toussaint River. The document references the Remedial Action Plan (RAP), but it does not clarify that it is specific to the Maumee River AOC.

Recommendations: The Final SEIS should update this section to reflect that areas of concern are EPA-designated Areas of Concern, with specific locations, degradations, and improvement goals. In this context, where “areas of concern” are described, the correct term AOC should be used. The “Buffalo area of concern” should be updated to refer to the Buffalo River AOC. Further, the document should reflect that Davis-Besse is within the Maumee River AOC and that the RAP has been developed to improve water quality of the Maumee River and Lake Erie.

Response: *The NRC recognizes that Davis-Besse lies within the EPA-designated Maumee River Area of Concern. The NRC has incorporated the EPA’s recommended modifications into Section 2.2.6 of the SEIS.*

Comment 25-6-AQ: The Davis-Besse site is largely wetland, per the description on page 2-1, but the Draft SEIS does not include a map of the types of wetlands found onsite. EPA is particularly interested in wetlands that are not actively managed under the Ottawa National Wildlife Refuge, but rather those that could be impacted or adjacent to refurbishment and other activities related to the operation of Davis-Besse. The Draft SEIS is unclear whether a wetland delineation was completed and whether wetlands are adjacent to areas proposed for construction.

Recommendation(s): EPA recommends including a wetland map and a proposed refurbishment facilities map in the Final SEIS. We acknowledge that the new facilities are proposed for previously-disturbed land, but without a map of both the aquatic resources and the proposed facilities, it is difficult to review potential direct and indirect impacts. EPA reminds NRC and the applicant to avoid even temporary, direct impacts to wetlands, such as staging construction equipment in wetlands. We recommend the Final SEIS include how the applicant and NRC will ensure direct and indirect impacts to wetlands are avoided. Temporary impacts to jurisdictional wetlands would trigger the need for a Clean Water Act Section 404 permit from the U.S. Army Corps of Engineers.

Response: *As described in Section 2.2.7.2, the Davis-Besse site comprises 954 acres. Navarre Marsh, which is leased to the U.S. Fish and Wildlife Service (FWS) for management as part of the Ottawa National Wildlife Refuge, covers 733 acres, and the remaining 221 acres contain facility buildings, structures, and parking lots; woodlands; low grasslands; and marginal agricultural land. Figure 2.1-3 depicts the on-site wetlands (Navarre Marsh). The proposed license renewal would include some construction activities associated with refurbishment (i.e., replacement of the steam generators). As indicated in Section 3.1, all construction associated with the steam generator replacement was completed during a 90-day refueling outage in the spring of 2014, and less than 10 acres of land was affected, all of which was*

developed industrial land. Navarre Marsh was unaffected by the construction. The NRC understands that if FENOC were to perform activities that could impact jurisdictional wetlands, it would need to seek a Clean Water Act Section 404 permit from the U.S. Army Corps of Engineers. However, because refurbishment activities did not directly or indirectly affect any wetlands, a permit was not necessary.

No revisions to the SEIS were made as a result of this comment.

Comment 25-7-LR: Section 4.6.1, *Exposure of Aquatic Organisms to Radionuclides*, and Section 4.7.2, *Exposure of Terrestrial Organisms to Radionuclides*, provide information about the new Category 1 issues added in 2013 to the relicensing review process. Because this is a new issue, EPA finds the discussion lacking. There is no specific reference to guidance nor specific metrics that govern how the significance category was assigned.

Response: *Exposure of Aquatic Organisms to Radionuclides and Exposure of Terrestrial Organisms to Radionuclides are two new categories that were identified in the 2013 LR GEIS. Chapter 4 of the LR GEIS describes the analyses the staff used to evaluate the impact and determine the significance of these two new categories. As noted in the LR GEIS, the dose rates for aquatic and terrestrial biota were calculated with the RESRAD-BIOTA dose evaluation model using site-specific radionuclide concentrations in water, sediments, and soils reported in the Radiological Environmental Monitoring Program (REMP) reports for 15 NRC-licensed power plants (see Table 4.6-5 in the 2013 LR GEIS for the plant list). These 15 plants represent plants with a range of radionuclide concentrations in environmental media. The total estimated dose rates for aquatic biota for these plants were all less than 0.2 rad/d (0.002 Gy/d), considerably less than U.S. Department of Energy (DOE) guideline value of 1 rad/d (0.01 Gy/d). Thus, it is anticipated that normal operations of these facilities would not result in negative effects on aquatic biota. Effects on populations of aquatic biota from such doses would be SMALL. This is considered a Category 1 issue.*

Results of the RESRAD-BIOTA dose modeling show the dose estimates for three different terrestrial ecological receptors: riparian animal (an animal that is assumed to spend 50 percent of its time in water and 50 percent of its time on land), terrestrial animal, and terrestrial plant. The maximum estimated dose rate calculated for any of the 15 nuclear power plants was 0.0354 rad/d (3.54E-4 Gy/d) which is below DOE the guideline value of 0.1 rad/d (0.001 Gy/d) for a riparian animal receptor. On the basis of these calculations and a review of the available literature, the NRC concluded that the impact of routine radionuclide releases from past and current operations and refurbishment activities on terrestrial biota would be SMALL for all nuclear plants and would not be expected to appreciably change during the renewal period. This is considered a Category 1 issue. The SEIS was not revised as a result of this comment.

Comment 25-8-HH: Per section 4.9.3, *Electromagnetic Fields - Chronic Effects*, because chronic exposure to electromagnetic fields continues to be studied and are not known at this time, NRC does not categorize (sic) chronic effects from electromagnetic fields to be either Category 1 or 2 (generic or site-specific), but rather "UNCERTAIN." EPA believes it would be prudent to consider the chronic effects of exposure to electromagnetic fields to be a Category 2 issue (site-specific), until a generic determination can be made.

Recommendation: EPA recommends NRC consider exposure to electromagnetic fields to be a Category 2 issues (site-specific) until a scientific consensus can be made and impacts can be analyzed as a Category 1 (generic).

Response: Section 4.9.1.1.4 of the License Renewal Generic Environmental Impact Statement (GEIS); NUREG-1437, discusses the health effects of electromagnetic fields (EMFs) used to determine its categorization of UNCERTAIN. A review of the biological and physical studies of 60-Hz EMFs did not find any consistent evidence that would link harmful effects with field exposures. EMFs are unlike other agents that have a toxic effect (e.g., toxic chemicals and ionizing radiation) in that dramatic acute effects cannot be forced, and longer-term effects, if real, are subtle. Because of inconclusive scientific evidence, the chronic health effects of EMF are considered UNCERTAIN, and currently, no generic impact level can be assigned. The NRC will continue to monitor the research initiatives, both those within the national EMF program and others internationally, to evaluate the potential carcinogenicity of EMFs as well as other progress in the EMF study disciplines. If the NRC finds that the appropriate Federal health agencies have reached a consensus on the potential human health effects from exposure to EMF, the NRC will revise the GEIS to include the new information, change the categorization if needed, and determine what to require of all future license renewal applicants.

No changes were made to the SEIS as a result of this comment.

Comment 25-9-CI: Based on the discussion provided in section 4.15.5.1, *Human Health - Radiological*, EPA commends the applicant and NRC for maintaining an operational radiation dose level that is within public dose standards and are as low as reasonably achievable (ALARA). However, because of the new facility at Fermi in Michigan scheduled to come online as early as 2021 and other nuclear reactors along Lake Erie, EPA recommends the public dose levels be closely monitored to ensure values do not increase past historical levels.

Recommendation: EPA recommends that, with the addition of the new facility at Fermi in Michigan and other operating nuclear reactors adjacent to Lake Erie, public radiation doses are monitored closely to ensure no exceedances are recorded. Any exceedances should be reported to EPA.

Response: Section 4.15.5.1 of the Davis-Besse FSEIS discusses the cumulative impacts of the operation of Davis-Besse and any other currently operating or proposed new nuclear facilities within a 50-mile radius. The currently operating facilities and proposed new nuclear facilities at the Fermi plant site would contribute to the cumulative radiological impacts in the vicinity of the Davis-Besse site. However, the cumulative radiological impacts from all uranium fuel cycle facilities in proximity to each other are limited to the radiation protection standards in 10 CFR Part 20 and 40 CFR Part 190. The NRC staff's review of radioactive releases from Davis-Besse shows that the annual radiation dose to the public has been less than 1.0 mrem (0.01 mSv). This dose is well within the NRC's and EPA's radiation protection standards. In addition, as discussed in Section 4.8.1, Davis-Besse conducts a REMP around its site. The program measures radiation and radioactive materials in the environment from Davis-Besse and all other sources (i.e., other nuclear power plants such as Fermi, as well as other licensed users of radioactive material). Therefore, the REMP would monitor any cumulative impacts. As discussed in Section 4.8.1, the NRC staff reviewed the historical radiological environmental monitoring results for Davis-Besse and found no significant environmental impact associated with the operation of the plant. No revision to the SEIS was made as a result of this comment.

Comment 25-10-LR: Section 2.1.2.2, *Radioactive Gaseous Waste*, page 2-9, line 3, references 40 CFR Part 40, which is Research and Demonstration Grants. Please clarify if this is the intended citation.

Recommendation: Clarify whether this is correct; if not, please reflect the correct citation in the Final SEIS.

Response: *The commenter is correct in that the wrong regulation was cited. The regulation that should have been cited is 40 CFR Part 190, Environmental Radiation Protection Standards for Nuclear Power Operations. Section 2.1.2.2 has been revised to cite the correct regulation.*

Comment 25-11-LR: EPA recommends that resources agencies be provided with and the public have access to color versions of maps within the Draft SEIS, particularly for maps that rely on a color gradient. All maps in the paper copy and the CD of the Draft SEIS are provided in grey-scale, making it difficult to fully analyze certain impacts. For example, figures 2.1-2, 2.1-3, 2.2-1 should be provided in color, or at minimum the document should include specific location in NRC's Agencywide Documents Access and Management System (ADAMS). This means the citation should not just be given as an ADAMS access number, but should also include a specific page number.

Recommendation: NRC should provide access to color versions of maps that rely on color gradient. If nothing else, the ADAMS access number and specific page location should be provided indicating where the color versions can be found.

Response: *The version of the draft SEIS that is in ADAMS should have had color figures. For some unknown reason, when the PDF file of the draft SEIS was entered into ADAMS, the figures were not saved in color. When the final SEIS is published and entered into ADAMS, the staff will ensure that the figures will appear in ADAMS in color. No changes were made the SEIS as a result of this comment.*