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NL-15-075

June 8, 2015

U.S. Nuclear Regulatory Commission
Document Control Desk
11545 Rockville Pike, TWFN-2 F1
Rockville, MD 20852-2738

SUBJECT: Reply to Request for Additional Information Regarding the License
Renewal Application Environmental Review (TAC Nos. MD5411 and
MD5412)
Indian Point Nuclear Generating Unit Nos. 2 & 3
Docket Nos. 50-247 and 50-286
License Nos. DPR-26 and DPR-64

REFERENCE: NRC letter, "Request for Additional Information for the Review of the
Indian Point Nuclear Generating Unit Nos. 2 and 3, License Renewal
Application Environmental Review (TAC Nos. MD5411 and MD5412)"
dated April 22, 2015.

Dear Sir or Madam:

Entergy Nuclear Operations, Inc. is providing, in Attachment 1, the additional information requested in the referenced letter pertaining to NRC review of the License Renewal Application for Indian Point 2 and Indian Point 3.

There are no new commitments being made in this submittal. If you have any questions, or require additional information, please contact Mr. Robert Walpole, Regulatory Assurance Manager at (914) 254-6710.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 8, 2015.

Sincerely,

A handwritten signature in black ink, appearing to be "FD", followed by a long horizontal line.

FRD/rl

A128
NRR

Attachment 1: Reply to NRC Request for Additional Information Regarding the License
Renewal Application Environmental Review

Enclosure 1: Algonquin Incremental Market (AIM) Project, Phase 2 Acoustic Survey for
Indiana Bats (*Myotis sodalis*) and Northern Long-Eared Bats (*Myotis
septentrionalis*), August 2014

cc: Mr. Daniel H. Dorman, Regional Administrator, NRC Region I
Mr. Sherwin E. Turk, NRC Office of General Counsel, Special Counsel
Mr. Michael Wentzel, NRC Project Manager, Division of License Renewal
Mr. Douglas Pickett, NRR Senior Project Manager
Ms. Bridget Frymire, New York State Department of Public Service
Mr. John B. Rhodes, President and CEO NYSERDA
NRC Resident Inspector's Office

ATTACHMENT 1 TO NL-15-075

**REPLY TO NRC REQUEST FOR ADDITIONAL INFORMATION
REGARDING THE
LICENSE RENEWAL APPLICATION
ENVIRONMENTAL REVIEW**

**ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 & 3
DOCKET NOS. 50-247 AND 50-286**

Reply to NRC Request for Additional Information
Regarding the License Renewal Application Environmental Review

On April 2, 2015, the U.S. Fish and Wildlife Service (FWS) published a final rule (80 FR 17973) that lists the northern long-eared bat (*Myotis septentrionalis*) as threatened throughout its range. The northern long-eared bats' range includes Westchester County, New York, in which Indian Point Nuclear Generating Units 2 and 3 (IP2 and IP3) are located. Accordingly, the U.S. Nuclear Regulatory Commission (NRC) staff intends to address potential effects to this species as part of its IP2 and IP3 license renewal review. The NRC staff requests the following information to assist in its review:

1. *Provide any information that Entergy Nuclear, LLC (Entergy) has regarding the northern long-eared bat's use of the IP2 and IP3 site. Such information may include potential habitat (particularly summer roosting habitat) or other uses of the IP2 and IP3 site by the species, observations of the species on the site, and studies or monitoring performed to document potential presence of the species on the site. The FWS's final rule describes northern long-eared bat habitat in detail.*

Entergy Response:

A description of the terrestrial habitat on the Indian Point Units 2 and 3 (IP2 and IP3) site is contained in Section 2.2.6.1 (Description of Site Terrestrial Environment) of the Generic Environmental Impact Statement for License Renewal of Nuclear Plants, Supplement 38, Regarding Indian Point Nuclear Generating Unit Numbers 2 and 3 (hereafter referred to as the "SEIS"). As discussed in Section 2.2.6.1 of the SEIS, the site is located in the northeastern coastal zone of the eastern temperate forest ecoregion. The canopy of this forest includes a mixture of hardwoods such as red oak (*Quercus rubra*), white oak (*Q. alba*), black oak (*Q. velutina*), chestnut oak (*Q. prinus*), shagbark hickory (*Carya ovata*), black cherry (*Prunus serotina*), tulip tree (*Liriodendron tulipifera*), river birch (*Betula nigra*), and maple (*Acer* spp.), as well as conifers such as eastern hemlock (*Tsuga canadensis*) and white pine (*Pinus strobus*).

As discussed in the U.S. Fish and Wildlife Service's final rule (80 FR 17973), northern long-eared bats have been documented while roosting in many species of trees, including: black oak, northern red oak, silver maple, black locust, American beech, sugar maple, sourwood, and shortleaf pine. In addition as discussed in the final rule, the majority of northern long-eared bat telemetry studies found that roost trees for this species consist predominantly of hardwoods.

Therefore, habitat for the northern long-eared bat could potentially exist on the IP2 and IP3 site. However, Entergy has not conducted onsite studies or monitoring to document the potential presence of this species. In addition, there are no current license-renewal-related plans to disturb areas within the IP2 and IP3 property.

As part of the Algonquin Incremental Market Project, Spectra Energy did conduct an Indiana bat and northern long-eared bat acoustics survey. This survey is included in Enclosure 1.

2. *Because the Indiana bat (Myotis sodalis), a Federally endangered species that was addressed in the NRC's final supplemental environmental impact statement for IP2 and IP3 license renewal, is similar in its habitat requirements to the northern long-eared bat, please provide updated information, if applicable, on the Indiana bat's potential use of the IP2 and IP3 site.*

Entergy Response:

The potential use of the site by the Indiana bat is discussed in Section 2.2.6.2 (Threatened and Endangered Terrestrial Species) of the SEIS. Entergy has not conducted onsite studies or monitoring to document the potential presence of this species. In addition, there are no current license-renewal-related plans to disturb areas within the IP2 and IP3 property. Therefore, Entergy believes that the information contained in Section 2.2.6.2 of the SEIS continues to remain valid. However as previously discussed above, an Indiana bat and northern long-eared bat acoustics survey was conducted in conjunction with the Spectra Energy Algonquin Incremental Market Project. This survey is included in Enclosure 1.

3. *Provide updated information, if applicable, regarding the effects that activities associated with IP2 and IP3 license renewal and refurbishment could have on the northern long-eared bat and Indiana bat. Such activities may include habitat loss, degradation, disturbance, or fragmentation, as well as temporary or permanent increases in noise, vibration, dust, chemical use, lighting, vehicle use, and general levels of human activity during the license renewal term that may result from refurbishment or other site activities.*

Entergy Response:

Entergy has not identified any additional license-renewal-related activities that could effect the northern long-eared bat or Indiana bat other than what is discussed in Sections 3.2.2 (Threatened or Endangered Species—Refurbishment Impacts) and 4.6.2 (Terrestrial Threatened or Endangered Species) of the SEIS. As previously stated above, there are no current license-renewal-related plans to disturb areas within the IP2 and IP3 property.

4. *Describe the procedures or protocols that Entergy maintains, if any, to ensure that effects to Federally-listed bats are appropriately considered prior to site activities, such as hazardous tree removal, landscape maintenance, or other operations activities that could directly or indirectly affect bats.*

Entergy Response:

Entergy has a fleet procedure (Environmental Reviews and Evaluation) in place to ensure that environmentally sensitive areas at the IP2 and IP3 site, if present, are adequately protected during site operations and project planning. These controls, which encompass nonradiological environmental resource areas such as land use, air quality, surface water and groundwater, terrestrial and aquatic ecology, historical and cultural resources, and waste management and pollution prevention consist of the following:

- Appropriate local, state, and/or federal permits are obtained or modified as necessary.

- Best management practices (BMPs) are implemented to protect wetlands, natural heritage areas, and sensitive ecosystems.
- Appropriate agencies are consulted on matters involving federally and state-listed threatened, endangered, and protected species, and BMPs are implemented to minimize impacts to these species.
- Appropriate agencies are consulted on matters involving cultural resources and to ensure BMPs are implemented to minimize impact to this resource.

In summary, Entergy's administrative controls ensure that appropriate local, state, and/or federal permits are obtained or modified as necessary, that cultural resources and threatened and endangered species are protected if present, and that other regulatory issues are adequately addressed as necessary.

Hazardous tree removal is typically associated with transmission line right-of-ways. As discussed in Section 4.2.1 (Electromagnetic Fields—Acute Effects) of the SEIS, the two 345-kilovolt (kV) transmission lines that distribute power to the electric grid, and the two 138-kV lines that use the same transmission towers to supply offsite (standby) power, are contained within the IP2 and IP3 property boundary, except for where they cross Broadway (a public road) to connect to the Buchanan substation, which is owned by Consolidated Edison. Since these transmission lines are situated within the industrial area of the site, no hazardous tree removal activities occur.

Landscaping activities at the IP2 and IP3 site is limited to mowing, bush trimming and herbicide application for weed control. These type activities only occur in the industrial area of the site.

5. *Has Entergy observed any injured or dead bats (of any species) on the site, especially near the base of tall buildings and structures? If so, please describe these occurrences and include the date of observation, species (if known), condition of individual(s), and any follow-up actions that Entergy took as a result of the incident(s).*

Entergy Response:

Although Entergy does not have a specific program for monitoring bat or bird deaths on the site, when deaths such as this are discovered, they are typically documented in Entergy's condition reporting system. Based on review of Entergy's condition reporting system records over previous years (2010 – April 2015), no injured or dead bats (of any species) were observed within the industrial area of the IP2 and IP3 site.

6. *The Federal Energy Regulatory Commission's final environmental impact statement (FEIS) on the Algonquin Incremental Market (AIM) Project (available at <https://www.ferc.gov/industries/gas/enviro/eis/2015/01-23-15-eis.asp>) indicates that acoustic surveys for the northern long-eared bat and Indiana bat detected both species at locations in Westchester County, New York (see FEIS, p. 4-113 and 4-116). As indicated in Entergy's March 10, 2015, response to a request for additional information (ADAMS Accession No. ML15089A338), the Algonquin gas pipeline associated with this project would cross a portion of the IP2 and IP3 property. Is Entergy aware of whether the affected portions of the IP2 and IP3 site were surveyed for bats as part of the AIM project? Provide any available information obtained from those surveys concerning the presence or use of the IP2 and IP3 site by the northern long-eared bat.*

Entergy Response:

As previously discussed above, an Indiana bat and northern long-eared bat acoustics survey was conducted in conjunction with the Spectra Energy Algonquin Incremental Market Project. This survey is included in Enclosure 1.