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 Rules & Directives Review Branch (Post 920323)

SUBJECT: Comment on Duke Energy Corp Oconee Nuclear Station license renewal.

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Jim Wilson

63FR 50257
Sept. 21, 1998

NATIONAL

WILD TURKEY

FEDERATION

Wild Turkey Center

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October 14, 1998

Chief
Rules and Directives Branch
Division of Administrative Services
Mailstop T-6 D59
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Sir or Madam:

As input related to the public meeting process to be held on October 19, 1998, related to Duke Energy Corporation's Oconee Nuclear Station (ONS) license renewal, the National Wild turkey Federation (NWTF®) would like to provide the following comments.

The NWTF® is a conservation organization dedicated to the conservation of the wild turkey and the preservation of the turkey hunting tradition, with 180,000 members in all 50 states and 11 foreign countries.

NWTF® and Duke Energy have worked together for many years to protect and enhance wildlife habitats associated with Duke properties. In 1992, the parties expanded their joint efforts and signed a Memorandum of Understanding (MOU) to work cooperatively for the betterment of the wild turkey, other game and non-game wildlife, and for conservation education for our youth. That MOU, in a renewed and expanded form, continues today. As a result of the joint activities under this working agreement: 1) Duke's transmission ROW management policy for lines at ONS, throughout much of the upstate of SC, and in other game management areas to generally preclude mowing in the spring months when wild turkeys and other birds are nesting, 2) Duke, NWTF®, and the SC Department of Natural Resources (SCDNR) work cooperatively to develop and successfully implement wildlife habitat enhancements within ROWs and around power plant sites, including ONS, 3) Duke, NWTF®, and SCDNR have worked cooperatively on an annual basis to provide youth conservation-education events on the ONS site through the NWTF®'s Juniors Acquiring Knowledge, Ethics, and Sportsmanship (JAKES®) program and through a youth dove hunt that occurs within an ONS transmission ROW. These youth events reach several hundred youngsters annually.

These cooperative efforts involving Duke and its ONS area facilities have produced quality results for the wild turkey, wildlife in general, and for conservation-education. In 1994 NWTF® presented Duke its National Land Stewardship Award. Duke was the first company to

NWTF MISSION — THE CONSERVATION OF THE WILD TURKEY

AND THE PRESERVATION OF THE TURKEY HUNTING TRADITION.

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receive this award in the Utility Category. Appropriately, an employee of ONS, which is directly involved in so much of this effort, was one of two employees selected by Duke to receive this award at our National Convention in Nashville, Tennessee. In 1997, the JAKES® event held annually at ONS received one of five national awards presented by NWTF® for overall excellence. In addition, NWTF®, Duke, SCDNR, and SC Wildlife Federation, using the cooperative habitat work done at ONS as a model, have developed a new program to involve SC industries in wildlife conservation on surplus lands at their corporate sites. This new program, entitled Wildlife and Industry Together (WAIT) has already certified 12 SC industries for their habitat work, with many other applications pending.

Based on the above successful programs, and our long-term working relationship with Duke, the NWTF® feels that Duke Energy is an excellent example of a corporate steward of wildlife and its habitats both in its transmission ROWs, and its surplus lands around ONS and other power plants. We have had great success working together, and in partnership with other organizations, and look forward to continuing our relationship at ONS and other locations in the Duke system.

Sincerely,

A handwritten signature in black ink, appearing to be 'Rob Keck', with a long horizontal flourish extending to the right.

Rob Keck
Executive Vice President
Chief Executive Officer

RK/pt