

APPENDIX B
TO FACILITY OPERATING LICENSE NO. _____
WASHINGTON PUBLIC POWER SUPPLY SYSTEM
NUCLEAR PROJECT NO. 2 (WNP-2)

DOCKET NO. 50-397

ENVIRONMENTAL PROTECTION PLAN
(NONRADIOLOGICAL)

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WNP-2

ENVIRONMENTAL PROTECTION PLAN
(NONRADIOLOGICAL)

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1.0 Objectives of the Environmental Protection Plan

The Environmental Protection Plan (EPP) is to provide for protection of non-radiological environmental values during operation of Washington Public Power Supply System Nuclear Project No. 2 (WNP-2). The principal objectives of the EPP are as follows:

- (1) Verify that the plant is operated in an environmentally acceptable manner, as established by the FES and other NRC environmental impact assessments.
- (2) Coordinate NRC requirements and maintain consistency with other Federal, State and local requirements for environmental protection.
- (3) Keep NRC informed of the environmental effects of facility construction and operation and of action taken to control those effects.

Environmental concerns identified in the FES which relate to water quality matters are regulated by the licensee's NPDES permit.

2.0 Environmental Protection Issues

In the FES-OL dated December 1981 (NUREG-0812), the staff considered the environmental impacts associated with the operation of WNP-2. Certain environmental issues were identified which required study or license conditions to resolve environmental concerns and to assure adequate protection of the environment.

2.1 Aquatic Issues

No specific issues regarding water quality or aquatic biota were raised by the staff (FES-OL Sections 5.3.3, 5.3.4, and 5.5.2). The staff acknowledged entrainment and impingement studies which may be required by the U.S. Army Corps of Engineers under that agency's Section 10 Permit if upstream conditions change (Sections 5.5.3.2 and B5.5.3.2).

In accordance with Section 511(c)(2) of the Clean Water Act, the NRC will rely on the Washington Energy Facility Site Evaluation Council (EFSEC), issuer of the facility NPDES permit, for regulation of matters involving water quality and aquatic biota.

2.2 Terrestrial Issues

The staff identified no significant potential impacts to the terrestrial environment related to the operation of WNP-2 (FES-OL Section 5.5.1). However, to resolve uncertainty regarding the effects of cooling tower drift, the staff recommended a soil and vegetation analysis monitoring program (Section 5.5.3.1).

3.0 Changes in Plant Design and Operation

The licensee may make changes in plant design or operation or perform tests or experiments affecting the environment provided such changes, tests or experiments do not involve an unreviewed environmental question, and do not involve a change in the Environmental Protection Plan.* A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns (1) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the final environmental statement (FES) as modified by staff's testimony to the Atomic Safety and Licensing Board, supplements to the FES, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or (2) a significant change in effluents or power level (in accordance with 10 CFR Part 51.5(b)(2) or (3) a matter not previously reviewed and evaluated in the documents specified in (1) of this Subsection, which may have a significant adverse environmental impact. Changes in plant design or operation and performance of tests or experiments which do not affect the environment are not subject to the requirements of this EPP. Changes in plant design or operation and performance of tests or experiments which are required to achieve compliance with other Federal, State, or local environmental regulations or permits are not subject to the requirements of this section.

Before engaging in additional construction or operational activities which may affect the environment, the licensee shall prepare and record an environmental evaluation of such activity.** When the evaluation indicates that such activity involves an unreviewed environmental question, the licensee shall provide a written evaluation of such activities and obtain prior approval from the Director, Office of Nuclear Reactor Regulation. When such activity involves a change in the EPP, such activity and change to the EPP may be implemented as set forth in Section 5.3.

The licensee shall maintain records of changes in plant design or operation and of tests and experiments carried out pursuant to this section. These records shall include a written evaluation which provide bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question. The licensee shall include as part of his Annual Environmental Operating Report (per Subsection 5.4.1) brief descriptions, analyses, interpretations, and evaluations of such changes, tests and experiments.

*This provision does not relieve the licensee of the requirements of 10 CFR 50.59.

**Activities are excluded from this requirement if all measurable environmental effects are confined to on-site areas previously disturbed during site preparation and plant construction.

4.0 Environmental Conditions

4.1 Unusual or Important Environmental Events

Any occurrence of an unusual or important event that indicates, or could result in, significant environmental impact causally related to station operation shall be recorded and promptly reported to the NRC within 72 hours by telephone, telegraph, or facsimile transmissions followed by a written report per Subsection 5.4.2. This section does not apply to water quality matters regulated by the NPDES permit.

No routine monitoring programs are required to implement this condition.

4.2 Environmental Monitoring

A terrestrial monitoring program shall be conducted to verify the level of effect from cooling tower drift. Soil and vegetation samples will be collected at locations subject to drift deposition and at control stations and analyzed for relevant chemical and physical parameters. Samples will be collected once per year during the seasonal peak of plant growth commencing no later than 18 months after issuance of a full power (100%) license. This program shall be terminated when data from three growing seasons after commencement of full power operation have been collected, provided the data support hypotheses of no adverse effects. Results and interpretation shall be included as part of the Annual Environmental Operating Report (Subsection 5.4.1).

5.0 Administrative Procedures

5.1 Review and Audit

The licensee shall provide for review and audit of compliance with the Environmental Protection Plan. The audits shall be conducted independently of the individual or groups responsible for performing the specific activity. A description of the organization structure utilized to achieve the independent review and audit function and results of the audit activities shall be maintained and made available for inspection.

5.2 Records Retention

Records and logs relative to the environmental aspects of plant operation shall be made and retained in a manner convenient for review and inspection. These records and logs shall be made available to NRC on request.

Records of modifications to plant structures, systems and components determined to potentially affect the continued protection of the environment shall be retained for the life of the plant. All other records, data and logs relating to this EPP shall be retained for five years or, where applicable, in accordance with the requirements of other agencies.

5.3 Changes in Environmental Protection Plan

Request for changes in the Environmental Protection Plan shall include an assessment of the environmental impact of the proposed change and a supporting justification. Implementation of such changes in the EPP shall not commence prior to NRC approval of the proposed changes.

5.4 Plant Reporting Requirements

5.4.1 Routine Reports

An Annual Environmental Operating Report describing implementation of this EPP for the previous calendar year shall be submitted to the NRC prior to May 1 of each year. The initial report shall be submitted prior to May 1 of the year following issuance of the operating license. The period of the first report shall begin with the date of issuance of the operating license.

The report shall include summaries and analyses of the results of the environmental protection activities required by Subsection 4.2 for the report period, including a comparison with preoperational studies, operational controls (as appropriate), and previous non-radiological environmental monitoring reports, and an assessment of the observed impacts of the station operation on the environment. If harmful effects or evidence of trends towards irreversible damage to the environment are observed, the licensee shall provide a detailed analysis of the data and a proposed course of action to alleviate the problem.

The Annual Environmental Operating Report shall also include:

- (a) A list of EPP noncompliances and the corrective actions taken to remedy them.
- (b) A list of all changes in station design or operation, tests, and experiments made in accordance with Section 3.0.
- (c) A list of nonroutine reports submitted in accordance with Subsection 5.4.2.
- (d) A summary of NPDES permit related water quality reports sent to EFSEC during the report period.

In the event that some results are not available by the report due date, the report shall be submitted noting and explaining the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

5.4.2 Nonroutine Reports

A written report shall be submitted to the NRC within 30 days of occurrence of a nonroutine event. The report shall, to the extent practicable, (a) describe, analyze, and evaluate the event, including extent and magnitude of the impact and plant operating characteristics, (b) describe the probable cause of the event, (c) indicate the action taken to correct the reported event, (d) indicate the corrective action taken to preclude repetition of the event and to prevent similar occurrences involving similar components or system, and (e) indicate the agencies notified and their preliminary responses.

Events reportable under this subsection which also require reports to other Federal, State or local agencies shall be reported in accordance with those reporting requirements in lieu of the requirements of this subsection. The NRC shall be provided a copy of such report at the same time it is submitted to the other agency. This subsection does not apply to nonradiological water quality matters within the scope of the NPDES permit.

