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U. S. Nuclear Regulatory Commission
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Peach Bottom Atomic Power Station, Units 2 and 3
Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-277 and 50-278

Subject: Exelon Generation Company, LLC Comments on the Draft Generic
Environmental Impact Statement for License Renewal of Nuclear Plants
Supplement 10 Second Renewal Regarding Subsequent License Renewal for
Peach Bottom Atomic Power Station Units 2 and 3 [Docket ID NRC-2018-0130]

Reference:

1. Letter from Michael P. Gallagher, Exelon Generation Company, LLC (Exelon Generation), to U.S. Nuclear Regulatory Commission (NRC) Document Control Desk, "Application for Subsequent Renewed Operating Licenses," dated July 10, 2018.
2. Letter from Michael P. Gallagher, Exelon Generation, to NRC Document Control Desk, "Application for Subsequent Renewed Operating Licenses - Update per 10 CFR 2.390," dated July 24, 2018.
3. Letter from Michael P. Gallagher, Exelon Generation, to NRC Document Control Desk, "Response to NRC Request for Additional Information, dated November 23, 2018, Regarding the Peach Bottom Atomic Power Station, Units 2 and 3, Subsequent License Renewal Application, Environmental Requests for Additional Information," dated December 20, 2018.
4. Letter from Michael P. Gallagher, Exelon Generation, to NRC Document Control Desk, "Response to NRC Request for Additional Information, dated December 13, 2018, Regarding Peach Bottom Atomic Power Station, Units 2 And 3, Subsequent License Renewal Severe Accident Mitigation Alternatives Requests for Additional Information (EPID L-2018-RNW-0013)"
5. Letter from Eric R. Oesterle, NRC, to Michael P. Gallagher, Exelon Generation, "Notice of Availability of the Draft Plant-Specific Supplement 10, Second Renewal to the Generic Environmental Impact Statement For License Renewal of Nuclear Plants Regarding Subsequent License Renewal for Peach Bottom Atomic Power Station Units 2 and 3 (EPID L-2018-RNW-0013) dated August 1, 2019.

In the Reference 1 letter, Exelon Generation Company, LLC (Exelon Generation) submitted the Subsequent (i.e., Second) License Renewal Application (SLRA) for the Peach Bottom Atomic Power Station, Units 2 and 3 (PBAPS) in the form of a single CD-ROM. Based on review of the information contained on the CD-ROM, the NRC determined that one figure in the SLRA's Environmental Report main text contained sensitive information of a historic nature that rendered it inappropriate for public disclosure. Therefore, the Reference 2 letter notified the NRC staff that replacement files had been provided to the NRC's Document Control Desk in the form of a single, replacement CD-ROM.

In the Reference 3 and 4 letters, Exelon Generation responded to NRC requests for additional information to support the staff's review of the PBAPS SLRA Environmental Report (Appendix E to the SLRA).

In the Reference 5 letter, the NRC informed Exelon Generation of the availability of the Draft Supplement 10, Second Renewal to the Generic Environmental Impact Statement For License Renewal of Nuclear Plants Regarding Subsequent License Renewal for Peach Bottom Atomic Power Station Units 2 and 3 (Draft PBAPS SEIS) and indicated that public comments would be accepted.

Enclosure 1 to this letter provides written comments that affect substance in the Draft PBAPS SEIS.

Enclosure 2 provides suggestions for typographical corrections as well as corrections and clarifications of facts and information located throughout the Draft PBAPS SEIS.

There are no new or revised regulatory commitments contained in this letter.

If you have any questions, please contact Ms. Nancy L. Ranek, Senior Environmental Lead, Exelon License Renewal, at 267-533-1506.

Respectfully,

A handwritten signature in dark ink, appearing to read "Michael P. Gallagher", is written over a horizontal line.

Michael P. Gallagher
Vice President - License Renewal and Decommissioning
Exelon Generation Company, LLC

Enclosures:

1. Exelon Generation Company, LLC Comments Affecting Substance in Draft Generic Environmental Impact Statement for License Renewal of Nuclear Plants (NUREG-1437) Supplement 10 Second Renewal Regarding Subsequent License Renewal for Peach Bottom Atomic Power Station Units 2 and 3
2. Exelon Generation Company, LLC Comments Affecting Clarity, Accuracy, and Editing in Draft Generic Environmental Impact Statement for License Renewal of Nuclear Plants (NUREG-1437) Supplement 10 Second Renewal Regarding Subsequent License Renewal for Peach Bottom Atomic Power Station Units 2 and 3

cc: Regional Administrator- NRC Region I
NRC Project Manager (Environmental Review), NRR-DLR
NRC Project Manager (Safety Review), NRR-DLR
NRC Project Manager, NRR-DORL Peach Bottom Atomic Power Station
NRC Senior Resident Inspector, Peach Bottom Atomic Power Station
PADEP Manager – Nuclear Safety Program, Bureau of Radiation Protection
D.A. Tancabel, State of Maryland

**Exelon Generation Company, LLC
Comments Affecting Substance
Peach Bottom Atomic Power Station**

Draft Generic Environmental Impact Statement for License Renewal of Nuclear Plants (NUREG-1437), Supplement 10 Second Renewal Regarding Subsequent License Renewal for Peach Bottom Atomic Power Station Units 2 and 3

Item #	Section #	Page #	Line #	Comment
01	3.7.5	3-61	15 to 16	The first sentence of the paragraph in lines 15 to 16 on page 3-61 states that "Common carp come from coastal areas of the Caspian and Aral Seas and inhabit the Susquehanna River near Peach Bottom (Exelon 2018a; USGS 2017)." However, the list of references in Chapter 6 does not include any entry designated as "USGS 2017." Also, Exelon 2018a does not identify any possible location of origin for non-native common carp stocked in the Susquehanna River for recreational purposes. Consider deleting the sentence or, modify the sentence and change the cited references.
02	Table 4-1	4-2 to 4-4	Land Use, Surface Water Resources, and Terrestrial Resources	Four Category 1 issues are not listed in the DSEIS Table 4-1 on pages 4-2 to 4-4 as applicable to PBAPS. However, the PBAPS SLRA Environmental Report states that they are applicable to PBAPS. The issues are as follows: <ul style="list-style-type: none"> • "Offsite land use in transmission line ROWs" • "Altered thermal stratification of lakes" • "Surface water use conflicts (plants with once-through cooling systems)" • "Cooling tower impacts on vegetation (plants with cooling towers)" These issues are also not mentioned anywhere else in the DSEIS, which is how the DSEIS treats other Category 1 issues that the PBAPS SLRA Environmental Report determined were not applicable to PBAPS. Consider adding these four issues to Table 4-1 in the DSEIS, to indicate that they apply to PBAPS.
03	Table 4-2	4-5	Chronic Effects of Electromagnetic Fields	In Table 4-2 on page 4-5, there is a row labeled "Chronic Effects of Electromagnetic Fields." This row should be deleted from Table 4-2 because it is not an "Applicable Category 2 (Site-Specific) Issue," as the table's title indicates, and the DSEIS Section 4.11.1.1 on page 4-96 to 4-97 does not and should not provide a site-specific analysis of the issue. Instead, the DSEIS Section 1.4 should be revised on page 1-5 by explaining that the issue of chronic effects of electromagnetic fields (EMFs) associated with nuclear plants and associated transmission lines is an uncategorized issue because "the state of the science is currently inadequate."
04	4.2.4.1	4-8	20 to 21	In lines 20 to 21 on page 4-8, the text asserts that "more land would be required for mining additional uranium for up to 40 years." No basis for this statement is provided, and it is unclear why small modular nuclear units, which would be sized to replace the same amount of power that Peach Bottom Units 2 and 3 would produce if operations were

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				continued, would demand additional land for uranium mining and fuel fabrication beyond the level which would be needed to continue operating the Peach Bottom units. Accordingly, consider providing a basis for the determination that more land would be required to support the fuel cycle associated with the alternative of small modular nuclear units.
05	4.5.1.1	4-22	21 to 26	The text in lines 21 to 26 on page 4-22 state the conclusion that water use impacts at PBAPS are SMALL based on a comparison between the PBAPS consumptive use rate and the overall flow rate in Conowingo Pond. However, the same comparison is not done for the alternatives to reach their water use impact conclusions. As a result, conclusions about water use impacts for each alternative are based more on the assumed location of the alternative than on the technology being implemented. Accordingly, to draw an apples-to-apples comparison with respect to surface water use issues between the technology used in the proposed action and those used in the alternatives, consider performing the analyses in the final SEIS using an assumption that all alternatives would be situated on a water body with similar overall flow rate as exists in the Conowingo Pond.
06	4.7.1.1	4-39	4 to 11	<p>In lines 4 to 11 on page 4-39, the DSEIS contains the following text:</p> <p><i>CWA Section 316(b) Impingement and Entrainment Demonstration Study, 1973–1976</i> Philadelphia Electric Company (PECO), the owner of Peach Bottom prior to Exelon, submitted a CWA Section 316(b) Demonstration study to the State in accordance with its NPDES permit that was initially issued in 1976. PECO (1975) compared the biological community prior to and after operations commenced and determined that no significant detrimental effects had occurred as a result of Peach Bottom operation. In addition, PECO (1975) concluded that: "the intake structure at Peach Bottom reflects the best technology available for minimizing adverse environmental effects."</p> <p>The source of the quoted information is cited as PECO (1975), which according to the DSEIS (Section 6; lines 16 to 18 on page 6-33) is the following document:</p> <p>[PECO] Philadelphia Electric Company. 1975. "Materials prepared for the Environmental Protection Agency, Section 316(a) Demonstration for PBAPS Units No. 2 & 3 on Conowingo Pond." July 1975. ADAMS Accession Nos. ML19007A334 and ML19007A335.</p> <p>However, PECO (1975) does not contain the information about Peach Bottom CWA Section 316(b) studies that is attributed to it. As its title indicates, PECO (1975) is a CWA Section 316(a) Demonstration, which was submitted to the</p>

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				<p>U.S. Environmental Protection Agency in support of a thermal variance from water quality standards because, in 1975, responsibility for CWA Section 316 had not yet been fully assumed by the Pennsylvania Department of Environmental Protection.</p> <p>The document containing Peach Bottom's initial 316(b) Demonstration, which the DSEIS should have cited, is the following document, which is available at ADAMS Accession No. ML19064B235.</p> <p>[PECO] Philadelphia Electric Company. 1977. "Materials Prepared For The Environmental Protection Agency, 316(b) Demonstration for PBPAS Units No. 2 & 3 on Conowingo Pond." June 1977.</p> <p>For the same reason as for PECO (1975), PECO (1977) was also submitted to the U.S. Environmental Protection Agency rather than "the State."</p> <p>Appropriate corrections to the text and references should be made in lines 4 to 11 on page 4-39 and in lines 16 to 18 on page 6-33 of the DSEIS.</p>
07	4.7.1.1	4-42	12 to 16	<p>In lines 12 to 13 on page 4-42, the text states that "Exelon has completed two entrainment studies in connection with CWA Section 316(b) ...". Two studies are named in lines 14 to 16 on page 4-42. The study identified in line 16 on page 4-42 is called "<i>CWA Section 316(b) Entrainment Demonstration Study from 2005 to 2006.</i>" However, Exelon Generation is not aware of the existence of this entrainment study and believes its identification in line 16 to be erroneous. This conclusion is supported by the fact that subsequent text following line 16 on page 4-42 in the DSEIS provides no summary of entrainment data from 2005 to 2006. Accordingly, all text in line 16 on page 4-42 should be deleted.</p> <p>Also, note that the document listed as "URS and NAI 2008" (ADAMS Accession Number ML19007A326) in the DSEIS list of references (Section 6) contains no entrainment data.</p>
08	4.7.1.1	4-42	18 to 25	<p>See previous comment regarding lines 4 to 11 on page 4-39. The same erroneous citation to PECO (1975) occurs in lines 18 to 25 on page 4-42, and the text should be revised to address the error.</p>
09	Figure 4-2	4-43	1 to 3	<p>Figure 4-2 in line 1 on page 4-43 is labeled in line 3 as "<i>Relative Percentage of Entrained Fish by Species,</i>" and "URS and NAI 2008" is cited in line 2 on page 4-43 as its data source. Exelon Generation believes this citation to be erroneous because URS and NAI 2008 (ADAMS Accession Number ML19007A326) addresses only impingement mortality characterization data and contains no entrainment data.</p>

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				Accordingly, a corrected citation should be provided for the source of the data depicted in Figure 4-2 on page 4-43.
10	4.10.1	4-89	22 to 43	In lines 22 to 43 on page 4-89, the DSEIS Section 4.10.1, which describes impacts of the Proposed Action on socioeconomics, does not mention transportation impacts. In comparison, Sections 4.10.2 through 4.10.7, which address the No-Action and Replacement Power alternatives, all discuss transportation impacts. For completeness and consistency, consider adding a discussion of transportation impacts in Section 4.10.1.
11	4.11.1.1	4-96 to 4-97	33 to 41 1 to 15	The DSEIS Section 4.11.1.1, "Uncategorized Issue Relating to Human Health: Chronic Effects of Electromagnetic Fields" should be deleted because, as the GEIS states, "the state of the science is currently inadequate" to support conclusions about impacts. If a discussion of the status of research about this issue is needed in the DSEIS, then consider presenting it in the DSEIS Section 1.4 rather than in the DSEIS Section 4.11.1.
12	4.11.2	4-100	16 to 18	In lines 16 to 18 on page 4-100, the text asserts that "[i]n Section 4.12, "Environmental Justice," the NRC staff concludes that the impacts of accidents during operation are SMALL." However, the word "accident" doesn't appear anywhere in Section 4.12. Accordingly, the assertion in lines 16 to 18 should be either revised or deleted.
13	4.11.7	4-102	16 to 17	In lines 16 to 17 on page 4-102, the text asserts that "the human health impacts from the operation of the wind component for the combination alternative would be SMALL." However, no basis for this conclusion is provided. The preceding sentences merely identify potential impacts with no discussion of the severity of the impacts. Consider adding information about magnitude of impacts to support the conclusion.
14	6.0	6-33	16 to 18	See the previous comment, above, regarding lines 4 to 11 on page 4-39, which identifies that citations to PECO (1975) are erroneous. Consistent with the changes suggested in that comment, in lines 16 to 18 on page 6-33, the list of references should be changed by adding a citation for the 1977 Peach Bottom 316(b) Demonstration, as follows: [PECO} Philadelphia Electric Company. 1977. "Materials Prepared for the Environmental Protection Agency, 316(b) Demonstration for PBPAS Units No. 2 & 3 on Conowingo Pond." June 1977. ADAMS Accession No. ML19064B235.
15	E.3.1	E-7	28 to 29	In lines 28 to 29 on page E-7, correct the sentence by revising it to read as follows [underline font indicates new or modified text]: "This change represents a factor-of-17 reduction <u>since the previous license renewal application</u> in CDF for each

Item #	Section #	Page #	Line #	Comment
				<p>Peach Bottom unit <u>compared to the mean BWR internal events (full power) CDF provided in the 2013 GEIS.</u></p> <p>Please review the reduction factor with respect to the appropriateness of its later use in Section E.3.10 on page E-14.</p>
16	E.3.2	E-8	26 to 28	<p>In lines 26 to 28 on page E-8, correct the sentence by revising it to read as follows [underline font indicates new or modified text]:</p> <p>“In conclusion, there was a greater-than-a-factor-of-17 decrease <u>since the previous license renewal application</u> in the Peach Bottom internal events CDF <u>compared to the mean BWR internal events CDF provided in the 2013 GEIS,</u> and seismic and fire risk for Peach Bottom was <u>also</u> determined to be within the values calculated in the GEIS.”</p> <p>Please review the reduction factor with respect to the appropriateness of its later use in Section E.3.10 on page E-14.</p>
17	E.3.10	E-14	21 to 33	<p>The paragraph in lines 21 to 33 on page E-14 should be reviewed, and if appropriate, modified because the “Factor of 17” decrease in PBAPS CDF was calculated relative to the mean BWR internal events CDF provided in the 2013 GEIS rather than relative to any previous CDF value for PBAPS.</p>
18	E.5.4	E-21	7 to 12	<p>In lines 7 to 12 on page E-21, clarify and correct the text as follows because, consistent with the NEI 17-04 guidance, Exelon did not screen industry SAMAs based on excessive implementation costs [underline font indicates new or modified text]:</p> <p>“Section 4.15.2.2 of Exelon’s subsequent license renewal environmental report describes the Peach Bottom Stage 1 screening <u>evaluation.</u> Using the methodology in NEI 17-04 “Model SLR New and Significant Assessment Approach for <u>SAMA,</u>” Exelon qualitatively screened from further evaluation any <u>industry</u> SAMAs that were not applicable to Peach Bottom <u>and industry</u> SAMAs that were already implemented at Peach <u>Bottom.</u>”</p>
19	E.5.6	E-23	25 to 27	<p>In lines 25 to 27 on page E-23, clarify the sentence by replacing the phrase “the maximum benefit” with the phrase “plant risk” as follows:</p> <p>“As described above, Exelon evaluated a total of 180 SAMAs for Peach Bottom subsequent license renewal and did not find any SAMAs that would reduce <u>plant risk</u> by 50 percent or more.”</p>
20	E.5.6	E-23	31 to 32	<p>In lines 31 to 32 on page E-23, correct the text by deleting the words “changed the conclusion of Peach Bottom’s previous SAMA analysis” and replacing them with corrected</p>

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				text as follows [underline font indicates new or modified text]: “... in that none <u>was found that would reduce plant risk by 50 percent or more.</u> ”
21	E.5.6	E-23	34 to 36	In lines 35 to 36 on page E-23, clarify the sentence as follows: “Therefore, the NRC staff concludes that there is no new and significant information <u>related to</u> the SAMA analysis performed for Peach Bottom’s initial license renewal.”

Exelon Generation Company, LLC
Comments Affecting Clarity, Accuracy, and Editing
Peach Bottom Atomic Power Station
Draft Generic Environmental Impact Statement for License Renewal of Nuclear Plants (NUREG-1437), Supplement 10 Second Renewal Regarding Subsequent License Renewal for Peach Bottom Atomic Power Station Units 2 and 3

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01	Abstract	iii	25	In line 29 on page 4-1, consider clarifying the text by replacing the phrase, "...preserving the option of license renewal ..." with the phrase, "...preserving the option of <u>extended Peach Bottom operation</u> ..." [underline font indicates new or revised text]
02	Exec Sum	xix	12	Between lines 11 and 12 on page xix consider adding a new subheading, "New and Significant Information Review," because the sentence in lines 12 to 14 on page xix does not relate to the prior subheading, which is "Alternatives"
03	Exec Sum	xv	14	Correct typo by replacing the date "July 10, 2054" with the date "July <u>2</u> , 2054" [underline text indicates new or modified text]
04	Exec Sum	xv	29 to 31	Clarify text by replacing "conducted a severe accident mitigation alternatives in-office audit" with "conducted <u>an in-office audit of Exelon's review for new and significant information regarding severe accidents</u> " [underline font indicates new or modified text]
05	Exec Sum	xv	7 to 9	In lines 7 to 9 on page xv, delete the following sentence because the SLRA supplements that are cited in the sentence have no relationship to or effect on the contents of the SLRA Appendix E - Environmental Report: "Exelon subsequently supplemented its application by letters dated September 14, 2018 (ADAMS Accession 8 No. ML18257A143) and January 23, 2019 (ADAMS Accession No. ML19023A015)."
06	Exec Sum	xvii	5	Correct sentence consistency by replacing the phrase "the conclusion in the GEIS related to Category 1 issues" with the phrase "the <u>conclusions</u> in the GEIS related to Category 1 issues." [underline font indicates new or modified text]
07	Exec Sum	xvii	5	Clarify text by replacing phrase "This conclusion is supported" with the phrase "This <u>finding</u> is supported" [underline font indicates new or modified text]
08	Table ES-1	xvii	GW Resources	For consistency with DSEIS Section 4.5.1.2, "Groundwater Resources," and Table 4-2, replace the phrase "Groundwater use conflicts (plants that withdraw more than 100 gallons per minute)" with the phrase "Groundwater use conflicts (plants with closed-cycle cooling systems that withdraw makeup water from a river)"
09	Table ES-1	xviii	Human Health	In the Table ES-1 row labeled "Human Health" and the column labeled "Relevant Category 2 issues" on page xviii, the following issue is not listed: "Microbiological hazards to the public (plants with cooling ponds or canals or cooling towers that discharge to a river)"

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				<p>Because this Category 2 issue is applicable to PBAPS and is addressed in the DSEIS Section 4.11.1.3 (pages 4-97 to 4-98), Table ES-1 should be corrected by adding this issue to the table.</p> <p>This issue is also missing from, and should be added to, Table 4-2, "Applicable Category 2 (Site-Specific) Issues for Peach Bottom," on page 4-5.</p>
10	Table ES-1	xviii	Postulated Accidents	For consistency with the GEIS and 10 CFR Part 51, Subpart A, Appendix B, Table B-1, in the column labeled "Relevant Category 2 Issues," replace "SAMA" with the words "Severe Accidents."
11	Abbreviations and Acronyms	xxi	CDMP	Delete the entry for "CDMP" because neither the abbreviation itself nor the term it abbreviates (i.e., "Comprehensive Master Development Plan") appears in the DSEIS
12	Abbreviations and Acronyms	xxii	m	To correct a typographical error, change "mete(s)" to "meter(s)"
13	Abbreviations and Acronyms	xxiv	Spp.	The term that "Spp." abbreviates is missing from the list
14	1 Introduction	1-1	5	The abbreviation "U.S.C." is not defined in the "Abbreviations and Acronyms" section
15	1.3	1-2	18 to 19	Clarify text by replacing the phrase "conducted an in-office severe accident mitigation alternatives audit" with the phrase "conducted <u>an in-office audit of Exelon's review for new and significant information regarding severe accidents</u> " [underline font indicates new or modified text]
16	1.3	1-2	21 to 22	Clarify text by replacing the phrase "the in-office severe accident mitigation alternatives audit" with the phrase " <u>the in-office audit of Exelon's review for new and significant information regarding severe accidents</u> " [underline font indicates new or modified text]
17	1.4	1-5	4 to 8	Clarify the paragraph in lines 4 to 8 on page 1-5 by explaining that one of the 78 environmental impact issues remains uncategorized (i.e., chronic effects of electromagnetic fields (EMFs) associated with nuclear plants and associated transmission lines) because "the state of the science is currently inadequate." Accordingly, <i>there are only 60 Category 1 issues</i> for which NRC considers new and significant information on a site-specific basis. The GEIS states that NRC will continue to monitor research on the potential carcinogenicity of EMFs, as well as other potential EMF effects, and will revise the GEIS in the future, if appropriate, to address this issue for future license renewal applications.
18	2.1	2-1	36 to 37	In lines 36 to 37 on page 2-1, for consistency with the license expiration dates provided elsewhere in the DSEIS, clarify the phrase "that began commercial operation in July 1974 (Unit 2) and December 1974 (Unit 3)" by replacing it with the phrase "that <u>began operation in August 1973</u> (Unit 2) and <u>July 1974</u> (Unit 3)" [underline font indicates new or modified text]

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19	2.2.2.1	2-8	6 to 7	In lines 6 to 7 on page 2-8, because Three Mile Island Unit 1 will be permanently shut down by September 30, 2019, update the phrase "the nearest being Three Mile Island Unit 1, located approximately 36 miles (mi) (58 Kilometers (km)) to the north" by replacing it with the phrase "the nearest being the <u>Salem Nuclear and Hope Creek Generating Stations, collocated at a single site approximately 43 miles (mi) (70 kilometers (km)) to the southeast.</u> " [underline font indicates new or modified text]
20	2.2.2.3 Table 2-1 4.2.6.1	2-11 2-7 4-9	24 to 26 General 30	The EIS is not consistent in how it addresses land use associated with the natural gas alternative. In Table 2-1 and on Page 2-11, the EIS states that the land use for a natural gas alternative would depend on the specific site location and proximity of natural gas pipelines, but could total more than 10,000 acres for "new gas wells", collection stations, and pipelines. On Page 4-9, the discussion of land use associated with the alternative refers to an undefined amount of "additional land" to connect to a pipeline, but states that no new gas wells would be required. The discussions should be made consistent with each other.
21	2.2.2.3	2-11	5 to 9	For consistency with the text in lines 10 to 13 on page 2-11, which states that the natural gas replacement power facility would be built on "an existing or retired plant site within the region of influence," replace the words "piped through the State's pipeline system to the Peach Bottom site" in the statement in lines 5 to 9 on page 2-11 with the words "piped through the State's pipeline system to the <u>plant site.</u> " [underline font indicates new or modified text]
22	2.2.2.4	2-13	11 to 14	Correct the typographical error in the sentence in lines 11 to 14 on page 2-13 by deleting the word "is" at the end of line 11.
23	2.2.2.4	2-14	12	Correct the typographical error in line 12 on page 2-14 by changing the word "that" to "than" in the phrase "... operating at higher than current capacities"
24	2.3.13	2-20	17 to 24	Section appears to reference the shutdown of OCNCS ("636-MWe nuclear plant), but not TMI.
25	2.3.13	2-20	18 to 19	In lines 18 to 19 on page 2-20, update the sentence that reads "Exelon also has plans to cease operation of a 636-MWe nuclear plant in the region of influence before 2020" by replacing it with the following sentence: "Exelon also permanently shut down a 636-MWe nuclear plant in the region of influence in September 2018 and, by the end of September 2019, will shut down a second nuclear plant with approximate generating capacity of 819 MWe in the region of influence."
26	3.1.2	3-3	2 to 3	In lines 2 to 3 on page 3-3, clarify that each reactor has its own Mark I containment structure by deleting the word "a" at the end of line 2 and between the words "... Boiling water reactors (BWRs) with ..." and the words "... Mark I containment."
27	3.1.3.1	3-7	2	In line 2 on page 3-7, align the sentence topic with the topic of the paragraph by replacing the phrase "the outer intake structure" with the phrase "the <u>inner</u> intake structure." [underline font indicates new or modified text]

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28	3.1.3.1	3-7	11 to 12 and 17 to 19	In lines 11 to 12 and lines 17 to 19 on page 3-7, clarify the purpose of helper towers by adding a few sentences explaining when and why the helper towers are used at Peach Bottom.
29	3.1.4.2	3-10	38 to 39	In lines 38 to 39 on page 3-10, clarify the location of the release point for non-condensable radioactive off gases by revising the sentence in these lines to read as follows [underline font indicates new or modified text]: "These waste gases are monitored for radioactivity and released to the atmosphere through a shared <u>main stack located atop the hill behind the reactor buildings, approximately 650 feet above plant grade.</u> "
30	3.1.4.2	3-11	1 to 2	In lines 1 to 2 on page 3-11, clarify the location of the release point for the reactor building ventilation system by revising the sentence in these lines to read as follows [underline font indicates new or modified text]: "... routed through a standby gas treatment system and released through the shared <u>main</u> stack once properly treated ..."
31	3.1.4.2	3-11	28	In line 28 on page 3-11, clarify the sentence by deleting the redundant word "dose" immediately following the parenthetical that reads "(7.50x10 ⁻⁴ milligray)".
32	3.1.4.2	3-11	40	In line 40 on page 3-11, clarify the sentence by deleting the redundant word "dose" immediately following the parenthetical that reads "(7.50x10 ⁻⁴ milligray)".
33	3.1.4.4	3-13	1	In line 1 on page 3-13, clarify the name of the licensee as follows [underline font indicates new or modified text]: " <u>Exelon</u> is also licensed to receive Class B and C LLRW <u>at Peach Bottom</u> from the Limerick Generating Station."
34	3.1.6.2	3-15	20 to 21	In lines 20 to 21 on page 3-15, clarify the sentence by revising it as follows [underline font indicates new or modified text]: "Refueling occurs <u>at each unit</u> approximately every 24 months on a partial, roughly one-third, batch basis (Exelon 2018a)."
35	3.1.6.2	3-15	22 to 23	In lines 22 to 23 on page 3-15, clarify the sentence by (1) changing "have" to "has" and (2) changing "provide" to "provides," as follows [underline font indicates new or modified text]: "Peach Bottom Unit 2 and Unit 3 each <u>has</u> a spent fuel pool that <u>provides</u> a total of 3,814 locations for the storage of new and spent fuel assemblies."
36	3.1.6.5	3-16	4 to 6	In lines 4 to 6 on page 3-16, consider clarifying the sentence in these lines by changing it to read as follows [underline font indicates new or modified text]: "The NRC also considers the impacts of the continued operation of the transmission lines that <u>exist solely</u> to supply outside power to the nuclear plant from the grid."
37	3.1.7	3-16	24	In line 24 on page 3-16, clarify the refueling frequency by replacing the phrase "at Peach Bottom" with the phrase "at each Peach Bottom unit" [underline font indicates new or modified text].
38	3.2.2	3-17	32 to 34	In lines 32 to 34 on page 3-17, clarify the location of the "rock cliff" by changing the sentence to read as follows [underline font indicates new or modified text]:

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				"A rock cliff, created when a hill was cut away for the power plant, is located immediately behind the Peach Bottom <u>Units 2 and 3 reactor buildings.</u> "
39	3.2.2	3-17	36 to 38	In lines 36 to 38 on page 3-17, clarify the location of the "high hill" by changing the sentence to read as follows [underline font indicates new or modified text]: "The most visible features are the Peach Bottom Units 2 and 3 reactor buildings, which are rectangular and lower than the 300-ft (91-m) high hill <u>located immediately behind them.</u> "
40	3.3.2	3-19	6	In line 6 on page 3-19, correct the typo by changing "NAAQs" to "NAAQS".
41	3.3.2	3-19	7	In line 7 on page 3-19, for consistency with the list of Abbreviations and Acronyms (on DSEIS page xxiii), consider changing the definition of "PM10" (in parentheses on line 7) to read as follows [underline font indicates new or modified text]: "... two sizes—PM10 (diameter <u>between 2.5 and 10 micrometers</u>) and ...". Alternatively, the entry for PM10 in the list of Abbreviations and Acronyms could be changed.
42	3.4.1	3-22	25 and 28	In lines 25 and 28 on page 3-22, correct typos by changing "ASML" to "AMSL" at one location in line 25 and two locations in line 28.
43	3.5.1.1	3-28	6 and 10	In lines 6 and 10 on page 3-28, correct typos by changing "ASML" to "AMSL" at one location in line 6 and one location in line 10.
44	3.5.1.2	3-28	23 to 24	In lines 23 to 24 on page 3-28, based on FERC 2015 [sec. 3.3.2.1, p. 103], clarify the sentence as follows [underline font indicates new or modified text]: "Water quality <u>data collected near the Muddy Run Pumped Storage Project point of discharge into Conowingo Pond indicate that discharged water usually meets State water quality standards</u> (FERC 2015)."
45	3.5.1.2	3-28	33 to 34	In line 33 on page 3-28, delete the phrase "In contrast to water temperatures;" because comparison of water temperature trend with dissolved oxygen level trend could be misleading and is not necessary.
46	3.5.2.2	3-36	12	In line 12 on page 3-36, correct the abbreviation for million liters per day. The abbreviation currently used in line 12 (i.e., "37 mld") is not included on the list of Abbreviations and Acronyms (on DSEIS page xxiii). Consider using "million Lpd".
47	3.5.2.2	3-37	36	In line 36 on page 3-37, correct typo by changing the phrase "from a little as 5 gpm" to the phrase "from <u>as little as 5 gpm</u> ". [underline font indicates new or modified text]
48	3.5.2.3	3-41	27	In line 27 on page 3-41, correct typo by changing the parenthetical from "(e.g., MW-PN-25)" to "(e.g., MW- <u>PB</u> -25)". [underline font indicates new or modified text]
49	3.5.2.3	3-41	6	In line 6 on page 3-41, correct the citation by changing "(Exelon 2011a)" to "(Exelon 2011)".

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50	3.7.2.1	3-57	1	In line 1 on page 3-57, add the word “to”, which is missing between the words “tend” and “include”, in the phrase “Bottom substrates within lentic systems tend include more fine-grained ...”
51	3.7.2.2	3-57	25	In line 25 on page 3-57, correct typo by changing the word “facilitates” to “facilities” in the phrase “an increase in migratory fish due to the installation of fish passage facilitates (e.g., fish lifts) at dams along the Susquehanna River ...”
52	3.7.2.2	3-57	39	In line 39 on page 3-57, the purpose of the citation “(NRC 2003a: 112-121, 126-129),” which appears at the end of the line, is not clear. Consider clarifying whether information from NRC 2003a is also being incorporated by reference.
53	3.7.2.2	3-57	44	Change “it’s” to “their” (assuming two entities performed the study)
54	3.7.2.2	3-58	27	In line 27 on page 3-58, correct the reservoir name by changing “Muddy River reservoir” to “Muddy <u>Run</u> reservoir.” [underline font indicates new or modified text]
55	3.7.4	3-60	10	In line 10 on page 3-60, correct the typo by changing the word “their” to the word “the” in the phrase “spend their majority of.”
56	3.7.5	3-61	15	In line 15 on page 3-61, correct the typo by changing the font style of the words “Common carp” to match the font style of other text in the document.
57	3.8.1.2	3-64	26	In line 26 on page 3-64, correct the typo by changing the word “weight” to “weigh” in the phrase “...and adults weight 3.9 oz (110 g) on average.”
58	3.8.1.2	3-76	17 to 23	For consistency with the text on page 3-63, revise the paragraph in lines 17 to 23 on page 3-76 to explicitly state that the listing status of the Chesapeake logperch by the U.S. Fish and Wildlife Service is “Under Review.”
59	3.8.1.3	3-81	2 to 4	In lines 2 to 4 on page 3-81, consider clarifying the phrase “as endangered range wide in the first listing” by revising the phrase as follows [underline font indicates new or modified text]: “The U.S. Fish and Wildlife Service listed the shortnose sturgeon as endangered <u>throughout its range</u> in the first listing (32 FR 4001) under the federal Endangered Species Preservation Act in 1967 (16 USC 668 et seq.).”
60	3.8.1.3	3-81	8 to 9	In lines 8 to 9 on page 3-81, replace the word “by” with the word “from” in the phrase “... that can be differentiated by other sturgeon species ...”
61	3.8.2	3-84	13	In line 13 on page 3-84, insert the following sentence at the end of the paragraph for consistency with the discussions of EFH species in other DSEIS Section 3.8.2 subsections: “No designated EFH for this species occurs in Conowingo Pond.”
62	3.10.2.1	3-90	8	Change “State of Pennsylvania” to “Commonwealth of Pennsylvania”
63	3.10.2.2	3-90	14	Change “State of Pennsylvania” to “Commonwealth of Pennsylvania”

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64	3.10.3	3-91	19	Change "State of Pennsylvania" to "Commonwealth of Pennsylvania"
65	3.10.5	3-97	6	Change "State of Pennsylvania" to "Commonwealth of Pennsylvania"
66	3.12	3-105	29	In line 29 on page 3-105, correct the typo by replacing the phrase, "... determine which block groups exceeds the percentage, ..." with the phrase, "... determine which block groups <u>exceed</u> the percentage, ..." [underline font indicates new or revised text]
67	3.12	3-106	15	Change "State of Pennsylvania" to "Commonwealth of Pennsylvania"
68	3.12	3-106	40	Change "State of Pennsylvania" to "Commonwealth of Pennsylvania"
69	3.13.2	3-109	36 and 38	Change "Peach Bottom" to "Exelon"
70	4		General	In some areas of the report both the common and scientific names are used and in other areas only the common is used – this is not consistent in the document.
71	4.1	4-1	29	In line 29 on page 4-1, consider clarifying the text by replacing the phrase, "...to preserve the option of subsequent license renewal ..." with the phrase, "...to preserve the option of <u>extended Peach Bottom operation</u> ..." [underline font indicates new or revised text]
72	4.1	4-2	23 to 24	In lines 23 to 24 on page 4-2, to clarify the citation, insert the words "Part 51 in" between the phrase "Appendix B to Subpart A of ..." and the phrase "Title 10 of the ..." The resulting phrase would read as follows [underline font indicates new or modified text]: "... Appendix B to Subpart A of <u>Part 51 in</u> Title 10 of the ..."
73	4.3.5.2	4-16	11	In line 11 on page 4-16, delete the words "and 4.3.4.2., both" because section 4.3.4.2 addresses noise impacts specific to construction of a new small modular nuclear plant, but does not identify any additional noise impacts beyond the common impacts discussed in section 4.3.3.2.
74	4.5.1.1	4-22	17	In line 17 on page 4-22, correct the text by replacing the phrase "closed-cycle cooling systems" with the phrase "once-through cooling systems with helper cooling towers"
75	4.5.1.2	4-25	25	In line 25 on page 4-25, clarify the text by replacing the phrase "Unit 3 turbine building separator area" with the phrase "Unit 3 turbine building <u>moisture</u> separator area" [underline font indicates new or modified text]
76	4.5.6.1	4-30	8	In line 8 on page 4-30, correct typo by adding one space between the phrase "Section 4.5.3.2" and the phrase "as impacts"
77	4.6.3	4-34	31 to 32	In lines 31 and 32 on page 4-34, because replacement power alternatives may be constructed by companies other than Exelon Generation Company, which is a merchant generator of electricity rather than a regulated monopoly, modify the sentence by replacing the phrase "allow Exelon to locate buildings and facilities" with the phrase "allow buildings and facilities to be located"

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78	4.6.4	4-35	17	In line 17 on page 4-35, because replacement power alternatives may be constructed by companies other than Exelon Generation Company, which is a merchant generator of electricity rather than a regulated monopoly, modify the sentence by replacing the phrase "assumption that Exelon would implement best management practices" with the phrase "assumption that best management practices would be implemented"
79	4.6.6	4-36	2	In line 2 on page 4-36, because replacement power alternatives may be constructed by companies other than Exelon Generation Company, which is a merchant generator of electricity rather than a regulated monopoly, modify the sentence by replacing the phrase "assumption that Exelon would implement best management practices" with the phrase "assumption that best management practices would be implemented"
80	4.6.6	4-36	36 to 37	In lines 36 to 37 on page 4-36, because replacement power alternatives may be constructed by companies other than Exelon Generation Company, which is a merchant generator of electricity rather than a regulated monopoly, modify the sentence by replacing the phrase "through Exelon's implementation of best management practices" with the phrase "through implementation of best management practices"
81	4.6.6	4-36	5 to 6	In lines 5 to 6 on page 4-36, because replacement power alternatives may be constructed by companies other than Exelon Generation Company, which is a merchant generator of electricity rather than a regulated monopoly, modify the sentence by replacing the phrase "the ability for Exelon to use" with the phrase "the ability to use"
82	4.6.6	4-36	9	In line 9 on page 4-36, correct typo by adding a comma and one space between the phrase "Section 4.6.3" and the phrase "although this alternative"
83	4.6.7	4-37	12 to 13	In lines 12 to 13 on page 4-37, because replacement power alternatives may be constructed by companies other than Exelon Generation Company, which is a merchant generator of electricity rather than a regulated monopoly, modify the sentence by replacing the phrase "Exelon would likely purchase power from" with the phrase "Replacement power would likely be purchased from"
84	4.7.1.1	4-42	26	The study named in line 26 on page 4-42 and summarized in the subsequent text ("CWA Section 316(b) Entrainment Demonstration Study, 2012") was not listed in lines 14 to 16 on page 4-42. It should be added to that list.
85	4.7.1.1	4-45	1 to 6	<p>In lines 1 to 6 on page 4-45, the DSEIS states: "The percent of withdrawn water relative to the flow past the [Peach Bottom] plant is relatively high compared to other once-through nuclear plants on rivers."</p> <p>The comparison names the LaSalle County Station as one example of a nuclear plant with once-through cooling. Because the LaSalle County Station uses a closed-cycle cooling pond rather than a once-through cooling system, the following phrase should be deleted from lines 3 to 4 on page 4-45:</p>

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				"...LaSalle County Station, Units 1 and 2, in Illinois withdraws approximately 0.3 percent of the Illinois River's flow past the plant (NRC 2016a), and ..."
86	4.7.1.2	4-50	14 to 15	In lines 14 to 15 on page 4-50, correct typo by replacing the phrase "experienced heightened temperatures" with the phrase "experienced <u>heightened</u> temperatures" [underline font indicates new or modified text]
87	4.7.1.2	4-50	27	In line 27 on page 4-50, clarify the sentence by replacing the phrase "Exelon varied cooling tower operation during each of the study years" with the phrase "in 2011, 2012, and 2013, Exelon operated one, two, and three cooling towers, respectively"
88	4.8.1.1	4-59	16	In line 16 on page 4-59, correct typo by inserting an opening quotation mark (") between the word "and" and the phrase "Indiana Bat (<i>Myotis sodalis</i>)"
89	4.8.1.1	4-68	11	In line 11 on page 4-68, correct typo by inserting ")" before the comma after the phrase "(Plants with Once-Through Cooling Systems or Cooling Ponds,"
90	4.8.1.1	4-71	11	Change "its" to "their" (assuming two entities performed the study)
91	4.8.5	4-83	12	In line 12 on page 4-83, clarify the sentence by replacing the phrase "would be required if a Federal agency" with the phrase "would <u>only</u> be required if a Federal agency" [underline font indicates new or modified text]
92	4.9.1.3	4-85	39 to 40	In lines 39 to 40 on page 4-85, clarify the sentence by replacing the phrase "Exelon will review potential impacts of decommissioning resources as part of the post-shutdown activities report" with the phrase "Exelon will review potential impacts of decommissioning <u>on historic</u> resources as part of the post-shutdown activities report" [underline font indicates new or modified text]
93	4.11.1	4-96	23 to 32	<p>In lines 23 to 32 on page 4-96, the text states that Peach Bottom impacts associated with all applicable Category 1 issues related to human health would be SMALL and that two Category 2 issues (electric shock hazards and chronic exposure to electromagnetic fields) apply to Peach Bottom.</p> <p>For completeness, the applicable Category 1 issues, including the issue of design-basis accidents, which is addressed in Section 4.11.1.4, should be identified in lines 23 to 32 on page 4-96. Also, the Category 2 issue dealing with microbiological hazards, which is addressed in Section 4.11.1.3, and the Category 2 issue of severe accidents, which is addressed in Section 4.11.1.4, should be identified in lines 23 to 32 on page 4-96.</p>
94	4.11.1.4	4-99	38 to 43	<p>For clarity and consistency with lines 38 to 44 on page E-18 in Appendix E to the DSEIS, replace the two full sentences in lines 38 to 43 on page 4-99, with the following text [underline font indicates new or modified text]:</p> <p>"This includes <u>identifying new information that is significant because it would provide a seriously different picture of the impacts from postulated severe accidents during the second license renewal term.</u> Accordingly, in its subsequent license</p>

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				renewal application environmental report, Exelon evaluated areas of new <u>information that could change the probability-weighted consequences of postulated severe accidents or would indicate that a given potentially cost-beneficial SAMA would substantially reduce either the consequences of or the probability of occurrence (risk) of a severe accident.</u>
95	4.11.1.4	4-100	3 to 6	In lines 3 to 6 on page 4-100, explicit conclusions should be added for clarity regarding (1) whether new and significant information related to the Category 1 issue of design-basis accidents was found and (2) whether new and significant information was found related to the conclusion in the Category 2 issue of severe accidents that the probability-weighted consequences of severe accidents are small.
96	4.11.3	4-100	22 to 23	In lines 22 to 23 on page 4-100, clarify the text by providing examples of the types of human health impacts that would be "associated with the construction of any major industrial facility." Possible examples include chemical hazards and physical occupational hazards (e.g., falls, burns/cuts/abrasions from contact with machinery, vehicle accidents, and heat exhaustion).
97	4.11.3	4-100	26	In line 26 on page 4-100, clarify the sentence by replacing the phrase "operation of a power station" with the phrase "operation of a <u>fossil-fuel-fired</u> power station" [underline font indicates new or modified text]
98	4.11.3	4-100	26 to 30	In lines 26 to 30 on page 4-100 the DSEIS describes human health impacts from gaseous emissions, which apply to fossil-fuel-fired power plants, but no other human health impacts common to industrial facilities are mentioned. Consider providing examples of other types of human health impacts that would be associated with the operation of any major industrial facility. Possible examples include chemical hazards and physical occupational hazards (e.g., falls, burns/cuts/abrasions from contact with machinery, noise, vehicle accidents, and heat exhaustion) to which Federal and state occupational health protection standards would apply.
99	4.11.4	4-100	40	In line 40 on page 4-100, correct typo by adding space between the period and the words "As such their"
100	4.13.3	4-107	General	In the DSEIS Section 4.13.3, no common waste management impacts from operation of replacement power alternatives are identified. Consider whether a discussion of common operational waste management impacts (e.g., disposal of plant trash and chemical wastes from equipment maintenance, recyclable materials management) should be added, for completeness and consistency with other DSEIS sections about common operational impacts of replacement power.
101	4.14	4-110	21	In line 21 on page 4-110, the sentence states that "New information is evaluated for significance using the criteria set forth in the GEIS." However, the preceding paragraphs in section 4.14 do not mention any "criteria set forth in the GEIS" for evaluating new information to determine its significance. Rather, it describes criteria set forth in Regulatory Guide 4.2, Supplement 1. Consider replacing "GEIS" in line 21 with "RG 4.2, Supplement 1." Alternatively, insert

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				appropriate information into section 4.14 describing the "criteria set forth in the GEIS" or citing the pertinent GEIS section(s).
102	4.15	4-111	25	In line 25 on page 4-111, correct typo by replacing the word "us" with the word "use"
103	4.15.2.2	4-113	15	In line 15 on page 4-113, clarify the cross-reference by adding the phrase "in this SEIS" after the words "Section 4.15.1.1, "Uranium Fuel Cycle"
104	4.15.3.2	4-121	42	In lines 41 to 44 on page 4 21, update the sentence by revising it as follows because Three Mile Island Unit 1 will be permanently shut down by September 30, 2019 [underline font indicates new or modified text]: "Two nuclear power plants are located within the 50-mi (80-km) radius of Peach Bottom Units 2 and 3: Salem/Hope Creek (approximately 43 mi (70 km) southeast and Limerick (approximately 47 mi (76 km) northeast) 43 (Exelon 2018a)."
105	4.16.5	4-131	45	In lines 43 to 45 on page 4-131, update the sentence by revising it as follows because Three Mile Island Unit 1 will be permanently shut down by September 30, 2019 [underline font indicates new or modified text]: "There are <u>two</u> other nuclear power facilities located within the 50-mi (80-km) radius: Salem/Hope Creek (43 miles <u>southeast and</u> Limerick (47 miles northeast)."
106	D	D-2	21	In the column labeled "Date" in Table D-1 on page D-2, provide the full date for the last item listed by replacing the words "July 2019" with the words "July <u>25</u> , 2019" [underline font indicates new or modified text]
107	E.2.2	E-6	22 to 28	For clarity and consistency with lines 38 to 44 on page E-18 in Appendix E to the DSEIS, replace the two full sentences in lines 22 to 28 on page E-6, with the following text [underline font indicates new or modified text]: "This includes <u>identifying new information that is significant because it would provide a seriously different picture of the impacts from postulated severe accidents during the second license renewal term.</u> Accordingly, in its subsequent license renewal application environmental report, Exelon evaluated areas of new <u>information that could change the probability-weighted consequences of postulated severe accidents or would indicate that a potentially cost-beneficial SAMA would substantially reduce the probability of occurrence (risk) of a severe accident.</u> "
108	E.2.2	E-6	31	In line 31 on page E-6, correct typo by replacing the phrase "As discussed in Section E-5 below" with the phrase "As discussed in Section <u>E.5</u> below" [underline font indicates new or modified text]
109	E.2.2	E-6	42 to 43	In lines 42 to 43 on page E-6, clarify the sentence by revising it to read as follows [underline font indicates new or modified text]: "Below, the NRC staff summarizes possible areas of new and significant information <u>related to the issue of severe accidents</u> and assesses Exelon's conclusions <u>regarding both severe accident consequences and SAMAs.</u> "

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110	E.3.3	E-9	18 to 23	The sentences in lines 18 to 23 on page E-9 do not appear relevant to the evaluation of new information about the source term (i.e., the magnitude and mix of radionuclides resulting from a severe accident). Consider revising them to clarify their relevance.
111	E.4	E-15	26 to 28	In lines 26 to 28 on page E-15, clarify the text by revising it to read as follows [underline font indicates new or modified text]: " ... but deemed it appropriate to consider severe accident mitigation alternatives for plants for which <u>such consideration was not previously done</u> , pending further rulemaking on this issue (61 FR 28481)."
112	E.4.2	E-17	30 to 32	In lines 30 to 32 on page E-17, clarify the sentence by changing it to read as follows [underline font indicates new or modified text]: "Thus, the NRC staff concludes that there is no new and significant information related to <u>SOARCA studies</u> that would alter the conclusions reached in the 2013 GEIS."
113	E.5	E-18	38	In line 38 on page E-18, clarify the phrase by revising it to read as follows [underline font indicates new or modified text]: " <u>In its evaluation of the significance of new information with respect to NEPA issues</u> , the NRC staff considers ..."
114	E.5	E-19	11 to 14	In lines 11 to 14 on page E-19, clarify the sentence by revising it to read as follows [underline font indicates new or modified text]: " <u>In general, the NEI 17-04 methodology (NEI 2017) does not consider a SAMA to be potentially significant unless it reduces by at least 50 percent the maximum benefit as defined in Section 4.5, "Total Cost of Severe Accident Risk/Maximum Benefit," of NEI 05-01, Revision A, "Severe Accident Mitigation Alternatives (SAMA) Analysis Guidance Document." ...</u> "
115	E.5.2	E-20	9	In line 9 on page E-20, clarify the text by adding "Unimplemented" before "Peach Bottom Phase 2 SAMAs".
116	E.5.3	E-20	32 to 34	In lines 32 to 34 on page E-20, clarify the text by changing it to read as follows [underline font indicates new or modified text]: " <u>Using the NEI 17-04 process</u> , Exelon re-evaluated <u>during Stage 1 of that process</u> the 30 SAMAs it had considered in connection with initial license <u>renewal</u> , with an additional screening criterion relating to very high-cost SAMAs."
117	E.5.3	E-20	34 to 37	In lines 34 to 37 on page E-20, clarify the text by changing it to read as follows [underline font indicates new or modified text]: " <u>In response to an NRC staff RAI relating to this additional screening criterion, Exelon explained that the very high-cost SAMAs eliminated by the additional criterion would have been eliminated in the initial license renewal Phase 1 evaluation had that evaluation used the guidance of NEI 05-01 (Exelon 2019).</u> "
118	E.5.3	E-20	39	In line 39 on page E-20, clarify the text by replacing the words "Phase 1" with the words "NEI 17-04 Stage 1".
119	E.5.6	E-23	29	In line 29 on page E-23, clarify the text by replacing the words "Phase 1" with the words "NEI 17-04 Stage 1".
120	Figure 1-1	1-3	Not applicable	Consider clarifying that the NRC Decision on subsequent license renewal is not based only on the final SEIS by adding a text box

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				labeled "NRC Safety Review Final Results" to Figure 1-1 with an arrow showing this activity entering the flow independently and immediately prior to the "NRC Decision" box.
121	Figure 3-3	3-5	Not applicable	Check orientation of North arrows in Figure 3-3. The North arrow in the "blow-up" of the plant site (upper RH corner in Figure 3-3) has a different orientation than the North arrow in the lower RH corner in Figure 3-3. The North arrow in the lower RH corner appears to be most accurate (i.e., in the vicinity of the Peach Bottom plant site, the Susquehanna River flows from NW to SE, rather than from N to S). The North arrow in Figure 2.2-1 in the Peach Bottom SLR ER (from which the "blow-up" was developed) was also erroneous. SEE ALSO Figure 3-6 (p. 3-34 in this DSEIS), on which the North arrow appears to be correctly oriented.
122	Figure 3-4	3-6	Not applicable	Same comment as for Figure 3-3. The North arrow for Figure 3-4 is not accurately oriented.
123	Table 3-1	3-19	9	In Table 3-1 on page 3-19, based on any changes made in line 7 on page 3-19, make conforming changes to the Table 3-1 column labeled "Pollutant."
124	Table 3-12	3-79	Not applicable	The title for Table 3-12 is "Potential Occurrences of Federally Listed Species in the Action Area." The last row in the table (Chesapeake Logperch) should be marked to clarify that Chesapeake Logperch is NOT a "Federally-Listed" species, as the table's title suggests. Rather, the status of its listing review by the U.S. Fish and Wildlife Service is "Under Review," as the text on p. 3-63 of the DSEIS indicates.