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RELATED CORRESPONDENCE

LAW OFFICES

CONNER & WETTERHAHN, P.C.

1747 PENNSYLVANIA AVENUE, N.W.

WASHINGTON, D.C. 20006

TROY B. CONNER, JR.
MARK J. WETTERHAHN
ROBERT M. RADER
INGRID M. OLSON
ARCH A. MOORE, JR.*
ROBERT H. PURL
OF COUNSEL
*NOT ADMITTED IN D.C.

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June 4, 1984

Judge John H. Frye, III
Chairman, Atomic Safety
and Licensing Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Mr. G.A. Linenberger, Jr.
Administrative Judge
1005 Calle Largo
Sante Fe, NM 87501

Dr. Frank F. Hooper
Chairman of Resource
Ecology Program
School of Natural
Resources
University of Michigan
Ann Arbor, MI 48104

DOCKET NUMBER
PROD. & UTIL. FAC. 50-358 OL

In the Matter of
The Cincinnati Gas & Electric Company, et al.
(Wm. H. Zimmer Nuclear Power Station)

Gentlemen:

Enclosed is a copy of Applicant Cincinnati Gas & Electric Company's response, dated June 1, 1984, to the NRC Staff's request for additional information, which was transmitted to Applicant by letter dated May 3, 1984.

The information relates to the Staff's environmental review of Applicant's request to withdraw its application for an operating license for the Wm. H. Zimmer Nuclear Power Station.

As indicated on the service list attached to the Applicant's letter, the parties to the proceeding have already been served by the Applicant from Cincinnati.

Sincerely,

Troy B. Conner, Jr.

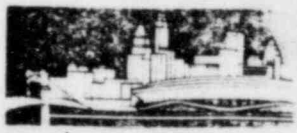


Troy B. Conner, Jr.
Counsel for the Applicants

TBC/dlf
Enclosure
cc: Service List without enclosure

T S03

THE CINCINNATI GAS & ELECTRIC COMPANY



CINCINNATI OH 45202 4003

June 1, 1984
ZSM-84-183

Docket 50-358

U. S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Washington, D. C. 20555

Attention: Mr. Harold R. Denton, Director

Gentlemen:

RE: Wm. H. Zimmer Nuclear Power Station, Unit 1 -
Request for Additional Information for Environmental Review
of Applicant's Request to Withdraw the Zimmer OL Application

Attached is The Cincinnati Gas & Electric Company's response to the request for additional information transmitted by NRC letter dated May 3, 1984 (B. J. Youngblood to J. R. Schott).

If you should have any questions or require any additional information, please feel free to contact me at (513) 553-7511 or Mr. G. C. Ficke at (513) 553-7555.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

by James R. Schott
James R. Schott
Zimmer Site Manager

JRS/mcm

Attachment

cc: Troy B. Conner, Jr., Esq.
William J. Moran
Samuel H. Porter
Gregory C. Ficke
David Martin, Esq.
Lynn Bernabei, Esq.
W. Peter Heile, Esq.
John D. Woliver, Esq.
John E. Dolan
Deborah Faber Webb
Andrew B. Dennsion, Esq.
George E. Pattison, Esq.
T. P. Gwynn
John Youkilis
Lawrence R. Fisse, Esq.
James G. Keppler
Robert Burger
James P. Fenstermaker
Robert S. Croswell

bcc: W. H. Dickhoner
E. A. Borgmann
S. G. Salay
W. D. Waymire
J. D. Flynn
B. K. Culver
T. W. Cummins

cc: Troy B. Conner, Jr., Esq.
William J. Moran
Samuel H. Porter
Gregory C. Ficke
David Martin, Esq.
Lynn Bernabei, Esq.
W. Peter Heile, Esq.
John D. Woliver, Esq.
John E. Dolan
Deborah Faber Webb
Andrew B. Dennsion, Esq.
George E. Pattison, Esq.
T. P. Gwynn
John Youkilis
Lawrence R. Fisse, Esq.
James G. Keppler
Robert Burger
James P. Fenstermaker
Robert S. Croswell

CG&E RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION FOR ENVIRONMENTAL REVIEW OF APPLICANT'S REQUEST TO WITHDRAW THE ZIMMER OL APPLICATION

Question 1:

Provide a site plan showing areas (including transmission corridors) disturbed by construction-related activities. Identify the specific use of each disturbed area. Estimate acreage for each such disturbed area.

Response

A site plan as of January 21, 1984 (announced decision to convert the Zimmer Station to coal) is shown on Figures 1 and 2. The plan identifies all temporary construction office facilities, craft trailers, tool trailers, sanitary facilities and permanent construction complexes, shops, warehouse structures, laydown areas and parking lots. The estimated acreage for the various areas is as follows:

| | | |
|---|---|---|
| 1. | Parking Lots and Roads | 87 |
| 2. | Power Block Area | 14 |
| 3. | Switchyard | 2 |
| 4. | Cooling Tower | 6 |
| 5. | Construction Support Facilities (including laydown compounds) | 48 |
| 6. | Settling Basin | 63 |
| 7. | Meteorological Towers | 9 |
| 8. | Borrow Areas | 10 |
| 9. | Transmission right-of-way | 28 |
| 10. | Undisturbed | 365 |
| | Total Site Acreage | 632 |

Maps showing transmission corridors associated with the Zimmer Station were previously submitted to NRC as Environmental Report-Operating License Stage (ER-OL) Figures 3.9.1 and 3.9.2. These figures have been reproduced and are provided as Appendix I to this report. Construction of these lines has been completed. The Zimmer-Silver Grove and Silver Grove - Terminal transmission lines were addressed in ER-OL, Section 9.1.

Question 2:

Identify on the site plan all structures. Indicate which structures will be removed and which will remain. Provide a schedule for removal of structures and describe the method of debris disposal.

Response

All construction related facilities are identified on Figures 1 and 2. Figure 3 identifies those construction facilities which are considered permanent and will remain. In addition, the meteorological towers will continue to be utilized to collect and supply information for site environmental studies. The transmission lines (Figure 1) are in service an will continue to provide interconnections to various CG&E sub-stations and neighboring utilities.

The temporary construction facilities, consisting for the most part of mobile office trailers, are identified by trailer number on Figure 2. All such temporary office trailers have been removed from site. It is anticipated that between 4-6 tool trailers will be kept for storage of construction tools, supplies and equipment. These trailers will be located adjacent to the permanent

construction shops. The Construction Office Building (Coordinates C-4) and temporary additions to the Carpenter Mill Shop (D-6), Weld Test Shop (D-6), Ironworkers Shop (D/E-6), Electrical Shop (E-7), Pipe Shop (E-6) and Paint Shop (F-7) were constructed during various time periods of the project and will be removed. All demolition will be accomplished by August 31, 1984.

Debris resulting from removal of the permanent building (Construction Office) and the temporary additions to the shops discussed above, will be removed from the site utilizing the services of a waste contractor. Disposal will be at the waste contractor's approved landfill operation. All debris resulting from building demolition will be removed by October, 1984.

Construction Buildings D, E, F (D-4), G, H, (D-5), I (C-2), J (D-3), K (E-2) and L (C-3) shown on Figure 2 were planned additions to the construction complex but were not erected.

Question 3:

Describe the status of the site, with particular attention to disturbed areas and to related erosion and runoff control measures.

Response:

Dames & Moore was contracted to prepare a report describing the status of the site and recommending a program which would leave the Zimmer site in a stable and environmentally sound condition until work on the coal plant conversion begins. The Dames & Moore report, Environmental Review of Zimmer Site Status, is attached and contains information in response to this question.

Construction of transmission lines associated with the station has been completed and the lines are in service as part of the Company's transmission system. Disturbed acreage has been restored, and maintenance of transmission line rights-of-way will continue in accordance with Company procedures and applicable regulations.

Question 4:

Describe plans for future use of the site to the extent that such plans have influenced the selection of site restoration activity, if any. Indicate the anticipated schedule for future use and describe how the future use influences the proposal for restoration work.

Response:

As a result of the decision of the Applicants to cease construction of Zimmer as a nuclear plant and utilize their best efforts to convert the Zimmer Station to a coal-fired facility, the Zimmer site will not be abandoned and will continue to use many of the Zimmer site facilities in the conversion design. As a result, prudent management dictates that a decision on the usefulness of these site improvements be made in conjunction with design efforts for the conversion project.

A commitment, at this time, as to which of the site facilities would be used would impose unnecessary and undesirable restraints on the layout and final design of the conversion project. Preliminary design and construction plans indicate that the existing permanent construction offices, shops, warehousing facilities and laydown areas are well suited and located to support future construction.

Final site and station layout may require modifications to current grading and elevation profiles and possible extension and/or relocation of onsite roadways and railroad spurs. Therefore, any site modifications and redress measures should occur in parallel with the final design and construction of the conversion project. For example, preliminary conversion site layout utilizes the construction parking lot and Building I areas for the boiler room, flue gas precipitators and main stack. Final configuration will be dictated by the design finally selected. The Applicant proposes no further site redress measures at this time, other than those identified in response to Question 5. As design and construction efforts proceed, disturbed site areas and any unnecessary site improvements implemented during construction of the Zimmer Station will be modified consistent with site development and environmental requirements of a fossil fuel-fired electric generating station.

Question 5:

Describe proposed restoration activities, if any, including procedures and schedules for grading, seeding, and planting which will be done to leave the site in a stable condition.

Response:

The recommended restoration program described in the attached Dames & Moore report will be implemented prior to the end of December, 1984.

Question 6:

Indicate what permits and approvals will be needed from other federal, state, or local agencies for any of the site restoration work.

Response:

We do not believe that any additional approvals or permits are needed from other federal, state or local agencies for the implementation of the restoration program. Should the need for such permits or approvals become evident, the NRC will be notified before work proceeds.

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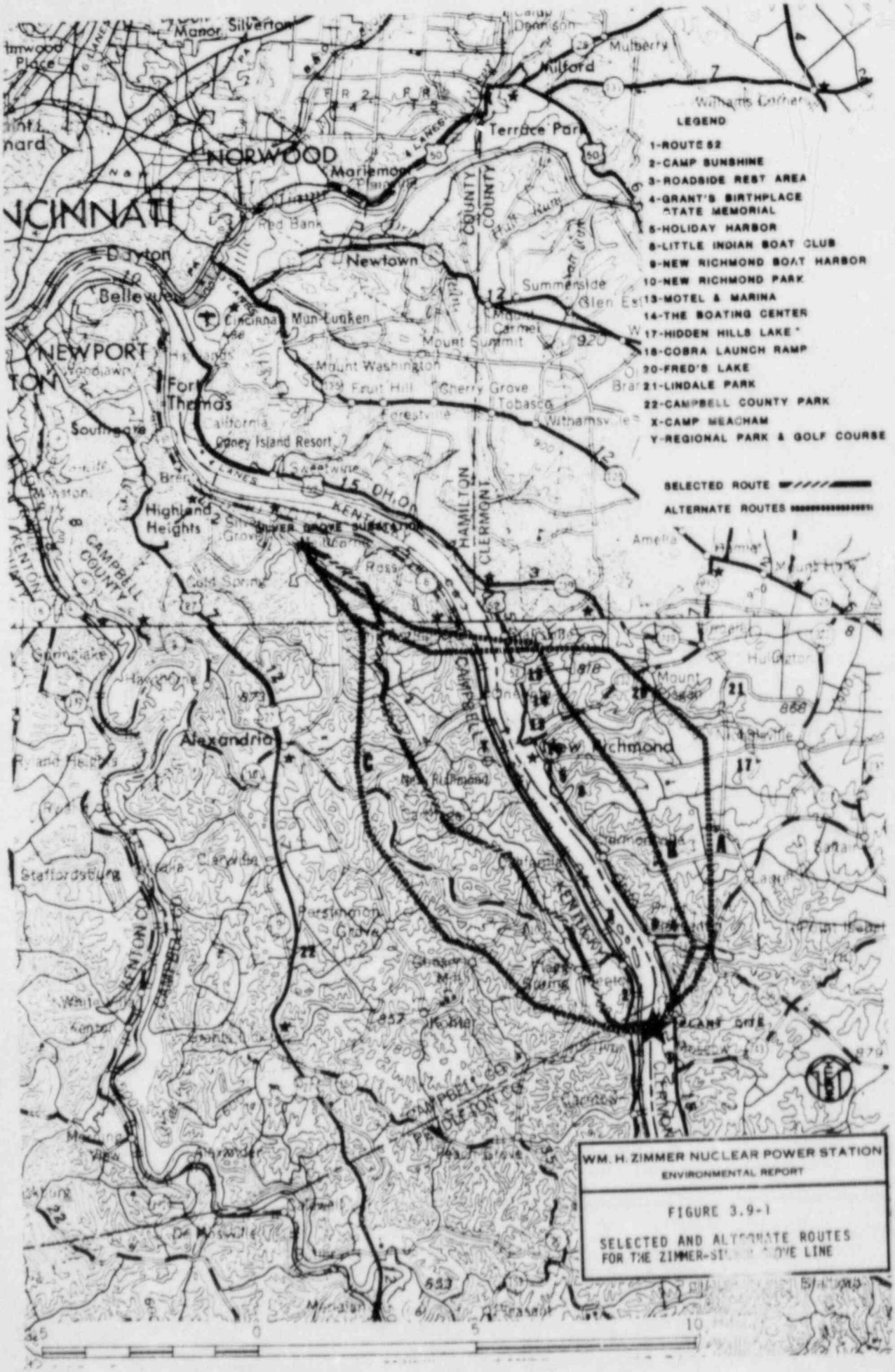
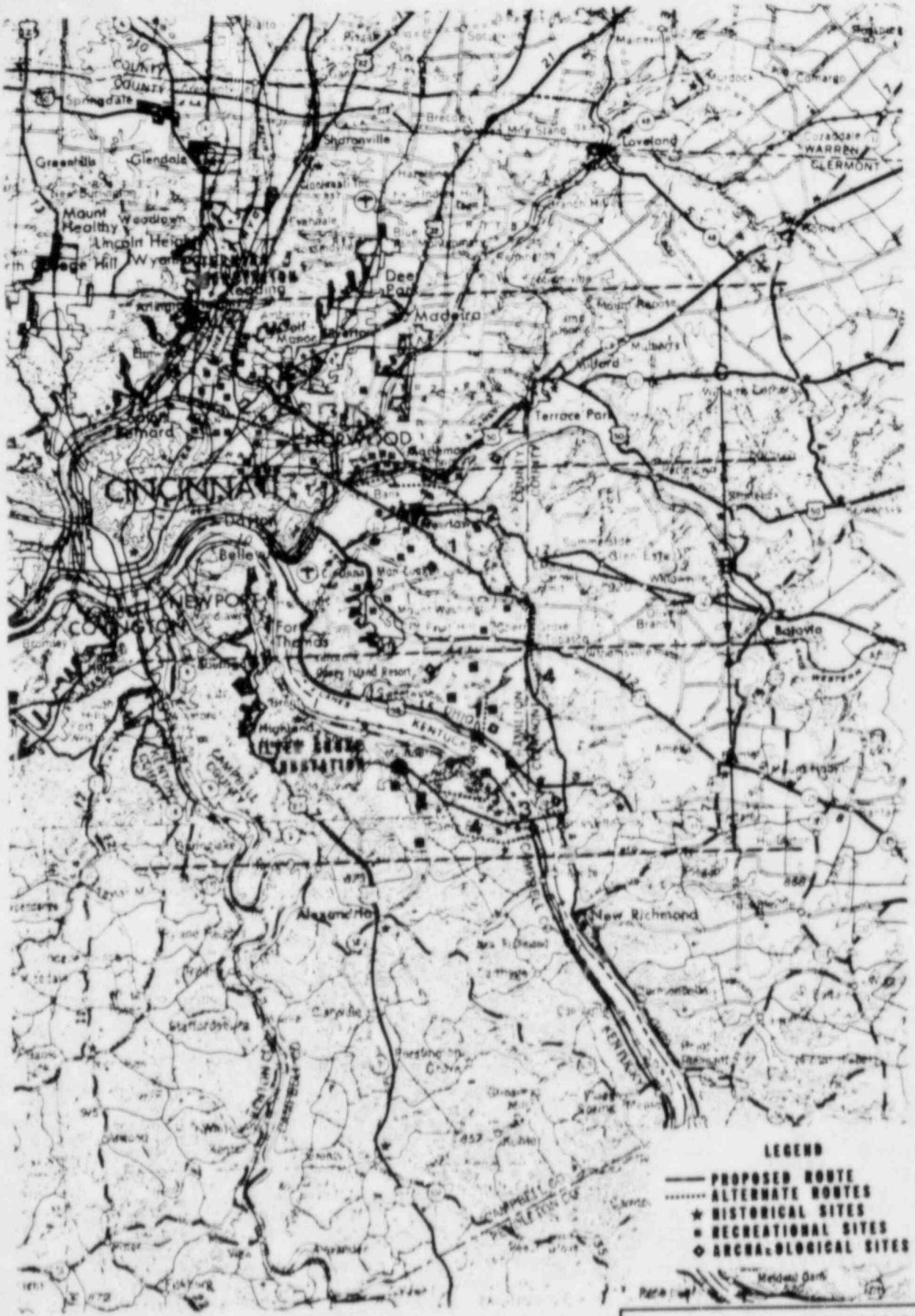
# APPENDIX I

ENVIRONMENTAL REPORT
OPERATING LICENSE STAGE

Figures 3.9-1, 3.9-2

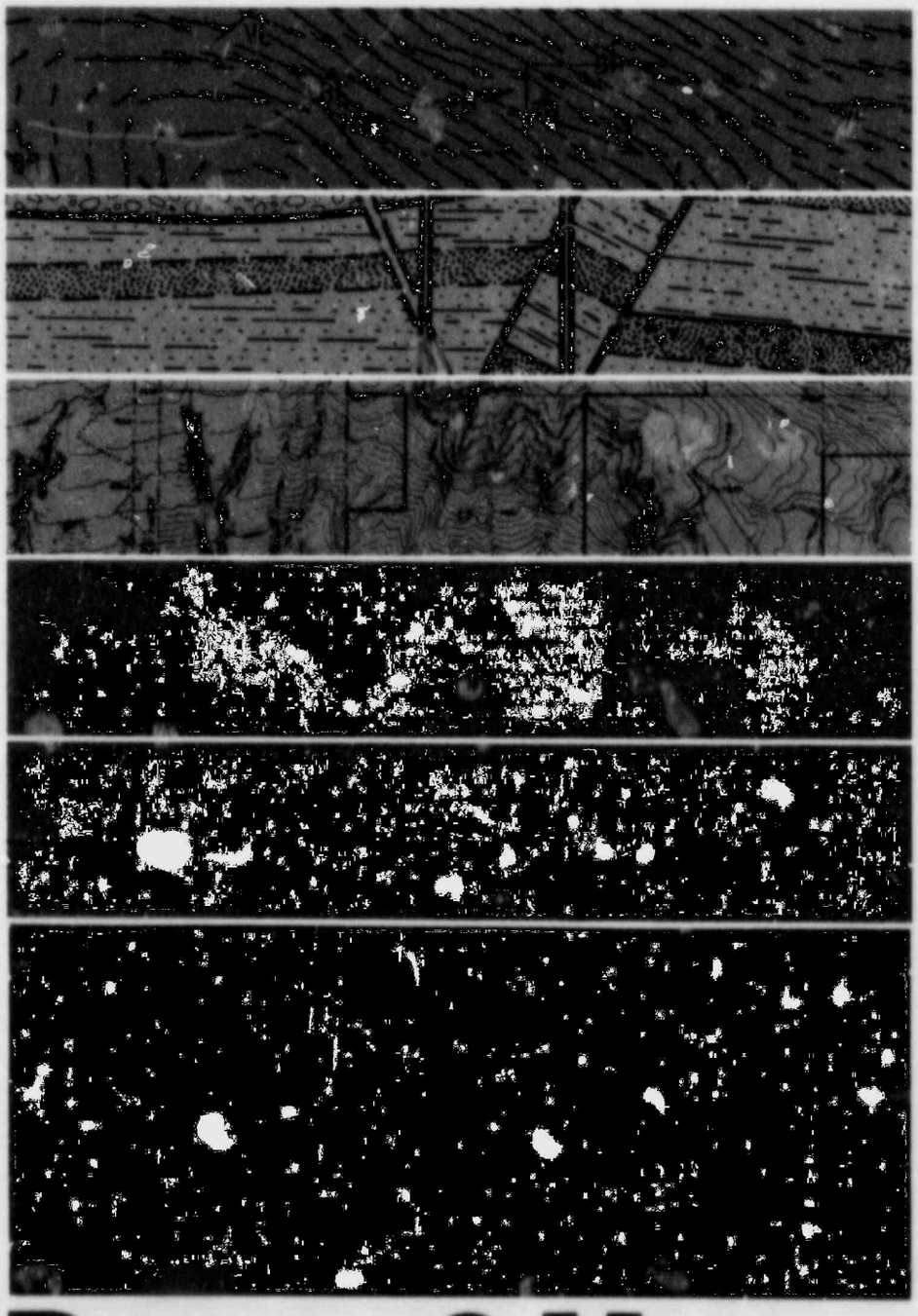

LEGEND
1-ROUTE 52
2-CAMP SUNSHINE
3-ROADSIDE REST AREA
4-GRANT'S BIRTHPLACE STATE MEMORIAL
5-HOLIDAY HARBOR
8-LITTLE INDIAN BOAT CLUB
9-NEW RICHMOND BOAT HARBOR
10-NEW RICHMOND PARK
13-MOTEL & MARINA
14-THE BOATING CENTER
17-HIDDEN HILLS LAKE
18-COBRA LAUNCH RAMP
20-FRED'S LAKE
21-LINDALE PARK
22-CAMPBELL COUNTY PARK
X-CAMP MEACHAM
Y-REGIONAL PARK & GOLF COURSE
SELECTED ROUTE
ALTERNATE ROUTES
NORWOOD
Terrace Park
Milford
Newtown
Summerside
Glen Este
Mount Summit
Mount Washington
Fruit Hill
Cherry Grove
Tobasco
Withamsville
Amelia
Bellevue
NEWPORT
Fort Thomas
Highland Heights
Southgate
Coney Island Resort
Alexandria
New Richmond
Mount
Hulbert
Stafford Station
Persimmon Grove
Ross
Cold Spring
Silver Grove Junction
HAMILTON
CLERMONT
COUNTY
CAMPBELL COUNTY
KENTON COUNTY
CAMPBELL CO
PENDLETON CO
KENTUCKY
OHIO
CANT DIE
WM. H. ZIMMER NUCLEAR POWER STATION
ENVIRONMENTAL REPORT
FIGURE 3.9-1
SELECTED AND ALTERNATE ROUTES
FOR THE ZIMMER-SI
OVE LINE




WM. H. ZIMMER NUCLEAR POWER STATION
ENVIRONMENTAL REPORT

FIGURE 3.9-2

SELECTED AND ALTERNATE ROUTES FOR THE SILVER GROVE-TERMINAL LINE



Dames & Moore

ENVIRONMENTAL REVIEW OF ZIMMER SITE STATUS
FOR THE CINCINNATI GAS & ELECTRIC COMPANY

MAY 31, 1984
JOB NO. 02580-057-17

Dames & Moore

**Dames & Moore**

644 Linn Street
Suite 501
Cincinnati, Ohio 45203
(513) 651-3440

May 31, 1984

The Cincinnati Gas & Electric Company
139 E. Fourth Street
Cincinnati, OH 45202

Attention: Mr. W. D. Waymire
Manager of General Engineering

Gentlemen:

Environmental Review of Zimmer Site Status
For The Cincinnati Gas & Electric Company

## INTRODUCTION

Dames & Moore has performed an environmental review of the Zimmer site status at the W.H. Zimmer Station as requested by The Cincinnati Gas & Electric Company (CG&E). This review focused on two particular items:

1. A description of the site's status, with particular attention to disturbed areas and to related erosion and runoff control measures

2. Development of a restoration plan, including procedures and schedules for grading and seeding, that will stabilize the site until construction of the coal plant begins

The study entailed a reconnaissance of the Zimmer site, discussions with CG&E personnel concerning the site status, a review of figures provided by CG&E showing the past and projected configuration of onsite facilities, and the development of a restoration plan for disturbed areas.

## SITE STATUS

Figures 1 and 2 show the configuration of onsite facilities as of January 21, 1984. These figures show the location of major onsite structures, borrow areas, existing roadways, access routes, parking lots, fence lines, and the switchyard and transmission corridors. Figure 3 presents the projected configuration of plant site facilities as of the end of December 1984. A comparison of Figure 3 with Figures 1 and 2 shows that most of the construction trailers and miscellaneous buildings will have been removed by the end of December 1984. The trailer and building-removal process is already well underway.

The basic site profile and elevations have remained largely unchanged for approximately 7 years, except for the following major site modifications:

- A craft-workers' parking lot covering approximately 10.6 acres was constructed immediately north of the main plant buildings during the fall of 1983; extensive fill and grading were required. The parking surface and access ramp were blacktopped during December 1983 and January 1984 to minimize dust impacts on the estimated 3,000 craft-workers, plant personnel, travelers on U.S. Route 52, and nearby residents and communities.

- A parking lot addition (see coordinates F-6 on Figure 2) was constructed during the same period as the craft-worker's parking lot. This parking lot was also blacktopped to minimize dust emissions.

- The existing parking areas along U.S. Route 52 (coordinates A-3 through A-6 and B-3 through B-6, Figure 2) were also paved in late 1983/early 1984 for the same environmental reasons indicated above. The parking area bounded by coordinates A-6 through A-8, and B-6 through B-8 was not paved because this area was designated as an overflow parking facility and the anticipated use was minimal.

- In the case of the formerly proposed buildings G, H, and I (see Figure 2), pilings were installed, but the buildings were never constructed. The top of the pilings protrude approximately 2 feet off the existing ground surface. There are no immediate plans to remove or grade over these piles; as presently envisioned, these areas will be used as laydown areas.

Overall, with the exception of the areas listed above, site drainage has been well established over the last several years. Sheet runoff is directed towards drainage ditches and conduits, and no evidence of severe onsite erosion was observed during a May 1984 reconnaissance of the Zimmer site. In general, the recent site modifications listed above conform to existing drainage patterns, and there is no reason to expect a significant increase in the rate of erosion due to these modifications.

The trailers and temporary buildings that either have been or will be removed are typically underlain by crushed rock or slab foundations. There are no plans to remove the slabs or take up the crushed rock at this time. It is envisioned that areas covered by these materials could be used during construction of the coal plant facilities. Unpaved areas interlying the trailers and buildings are covered by bare dirt, crushed rock, or a combination of the two. Invader species of grasses and weeds are scattered throughout these areas.

## RESTORATION PLAN

Site restoration work should be designed to minimize erosion and windborne dust originating from disturbed areas onsite. It should also be designed to preclude areas of standing water and saturated soils. However, it should not necessarily be designed to landscape the site, which will undergo additional disruption when coal plant construction activities begin.

The recommended restoration program should include three components: grading, revegetation or the addition of crushed rock, and limited modifications to site drainage patterns.

Grading: As indicated in Plates 1 and 2, limited grading is required and no significant cut and fill operations are envisioned. Grading should be designed to spread small mounds of dirt and rock found onsite; eliminate depressions where water is found to accumulate; smooth surfaces so re-vegetated areas can be maintained; and, reduce slopes, especially adjacent to some of the drainage courses, presently subject to higher rates of erosion. During grading, supervision of earthmoving activities should be provided to ensure that grades are constructed to direct runoff towards drainage ditches. Grading should be scheduled as soon as practical, prior to any revegetation programs.

Revegetation/Crushed Rock Additions: Plates 1 and 2 also show existing grassed-areas and areas where grass seed should be applied. All bare soil areas should be reseeded; it should be at a field supervisor's discretion to decide which areas of limited or sparse vegetative cover should receive seed to thicken ground cover.

Prior to seeding, the ground surface should be prepared by turning the soil with either a spring tooth harrow or a disc to a depth of approximately 4 inches; large rocks and debris should be removed. Based on typical Clermont County soils, a seed mix consisting of the following grasses and legumes is recommended:

| | Percent Composition |
|---|---|
| Sericea lespedeza (hulled) | 25 |
| K-31 fescue | 25 |
| White clover | 15 |
| Kentucky/Marion bluegrass | 25 |
| Perennial ryegrass | 10 |

Onsite soil chemistry tests should be performed prior to ordering the seed mix to adjust the mix for any unexpected conditions.

This seed mix is readily available, cost effective, quick germinating, easily maintained and effective for a fall planting. The legume component will help provide staying power over several seasons.

Broadcast seeding is recommended on flat to moderate slopes at a rate of 65 lbs per acre. If the use of a hydroseeder is required for steep slopes, this rate should be at least doubled. A common 10-20-20 blend fertilizer is recommended for application at a rate of approximately 350 lbs per acre. Also, application of pelletized lime is recommended at a rate of 80 lbs per acre. After the seed mix, fertilizer and lime are applied, a chain should be dragged across the surface to turn the seed under. Straw mulch should then be blown onto the reseeded areas at a rate of 1 ton per acre. From a scheduling standpoint, the seeding effort should take place no later than the first week of October.

The addition of crushed rock should also be applied at the discretion of a field supervisor. In general, sufficient rock should be applied to cover dirt surfaces as required.

Although most of the areas requiring seed and rock are located at the main plant site (see Plate 2), there are some areas that require seed and/or stone in the larger general site area (Plate 1), including:

1. The perimeter of the settling basin and certain adjacent areas
2. The two borrow areas immediately north of the new craft-workers' parking lot
3. Areas adjacent to the meteorological tower west of U.S. Route 52
4. Areas immediately adjacent to the access road leading to the meteorological tower east of U.S. Route 52
5. The borrow area along 345 kV transmission corridor east of U.S. Route 52

The two borrow areas (Items 2 and 5 above) will also require some drainage modifications, as discussed in the following section.

Drainage Modifications: Minor modifications to the existing site drainage are suggested to minimize erosion potential and/or eliminate areas of standing water. These areas include the two borrow areas previously discussed. In general, these modifications are relatively minor. One area requiring particular attention is a small impoundment immediately north of the new craft-worker parking lot. This impoundment should be drained and contoured to direct runoff towards Little Indian Creek, which would conform to natural drainage patterns before the new parking lot was constructed. Rip-rap should be laid in the channel draining the pond and the area should be revegetated according to the specifications presented herein.

At the borrow area east of U.S. Route 52, a diversion ditch should be cut in the northeast part of the area to direct water into a nearby creek. At present, water runoff is flowing down the borrow area access road, causing minor erosion. The borrow area should be reseeded and stone laid on the access road

**CLOSING**

If you should have any questions regarding this letter report, please do not hesitate to contact us.

Very truly yours,

DAMES & MOORE

Glenn D. Martin

Glenn D. Martin
Associate

GDM/ds

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