

## PMBelCOL PEmails

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**From:** Miller, Beverly M [Beverly.Miller@pnl.gov]  
**Sent:** Tuesday, December 11, 2007 6:14 PM  
**To:** William Burton; Mallecia Hood; Stacey Imboden; Robert Schaaf  
**Cc:** 'Eva E Hickey'; 'Robert W Bryce'  
**Subject:** Bellefonte Table 1  
**Attachments:** Bellefonte Acceptance Review Deliverable Signed Letter.pdf; Bellefonte Table\_1.doc; Bellefonte Table 1 - Needs.doc

Attached are two tables summarizing our Acceptance Review of the Bellefonte Environmental Report. In addition to the complete table, a table containing only the rows with additional data needs indicated in column 3 or 4 is attached. A pdf of the formal transmittal letter is also attached. Hard copies of the letter and tables are being sent to you via Fed Ex. Please call Bob Bryce (509-521-5595) or Bev Miller (509-375-3668) if you have any questions. Thank you!

<<Bellefonte Acceptance Review Deliverable Signed Letter.pdf>> <<Bellefonte Table\_1.doc>> <<Bellefonte Table 1 - Needs.doc>>

*Beverly Miller*

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**Hearing Identifier:** Bellefonte\_COL\_Public\_EX  
**Email Number:** 274

**Mail Envelope Properties** (C4A4C9A16294FB4CBA5A36312D05FFAC034CAA2D12)

**Subject:** Bellefonte Table 1  
**Sent Date:** 12/11/2007 6:13:33 PM  
**Received Date:** 12/11/2007 6:13:33 PM  
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<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	872	12/11/2007 6:13:33 PM
Bellefonte Acceptance Review Deliverable Signed Letter.pdf		114402
Bellefonte Table_1.doc	1787456	
Bellefonte Table 1 - Needs.doc	485440	

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**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

# Pacific Northwest National Laboratory

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December 11, 2007

Mallecia Hood  
U.S. Nuclear Regulatory Commission  
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11545 Rockville Pike  
Rockville, MD 20852

Dear Ms. Hood,

**Subject:** Acceptance Review Deliverable for JCN Q-4007, Task 3 TVA – “Bellefonte Nuclear Power Plan Environmental Review”

This letter constitutes the Subtask 1 deliverable for Task 3 TVA – “Bellefonte Nuclear Power Plan Environmental Review”, JCN Q-4007. PNNL has completed the Acceptance Review of the environmental report submitted by the Tennessee Valley Authority (TVA) as part of their application to the Nuclear Regulatory Commission for two new nuclear reactor units at the Bellefonte site near Scottsboro, Alabama. This letter report contains a summary of the Acceptance Review and an attachment that contains full results of the review in tabular format in accordance with Table 1 of Attachment D of NRO-REG-100.

PNNL finds that the Bellefonte environmental report meets the completeness requirement of the Acceptance Review. There were, however, technical deficiencies identified during the sufficiency review process. We believe these deficiencies can be addressed through the request for additional information (RAI) process. We have identified three more global items that could potentially result in changes to planning assumptions considered in development of the baseline review schedule. These items should not preclude PNNL from moving forward with the environmental review process. The issues include the alternative site selection process, referencing of Revision 16 of the Design Control Document for the AP1000 reactor and the lack of references to data and analysis included in the environmental report. The specific details of each of the items are provided below.

***Alternative Site Selection Process*** – The alternative site selection process is not clearly described and appears to be based on an unreferenced study that took place in the 1970s. Some discussion of a re-evaluation is presented but the nature of the reevaluation is not clear.

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***Design Control Document (DCD) for the AP1000 reactor*** – The Bellefonte COL application references Revision 16 of the Design Control Document (DCD) for the AP1000 reactor. The current Final Design Approval dated March 10, 2006 for the AP1000 reactor is based on revision 15 of the DCD. Thus to the extent that the Revision 16 changes the DCD, the Bellefonte application references a reactor design that has not received final design approval and is, therefore, an uncertified design.

***Availability or Referenceable Sources to Support Assertions Made in the Environmental Report*** – In numerous cases throughout the environmental report, references are not provided to support conclusions drawn or assertions made. Our conclusion that no issues were identified that would impact the schedule for development of an EIS was made assuming that TVA can provide referenceable material to support all of the conclusions drawn in the ER.

PNNL modified Table 1 of Attachment D of NRO-REG-100 in order to better facilitate the internal Acceptance Review process. PNNL incorporated information from the Environmental Review Acceptance Checklists into Table 1 to provide the reviewers the baselines for their analyses. In addition, some of the table headings were modified for clarification. These heading modifications have been italicized on the attached table. Some of the cells in the table have "NA" as the response to the questions. The "NA" can indicate one or more of the following: (1) the question is not applicable to the specific application, (2) the question needs updating in the ESRP, or (3) the question is not appropriate for the Acceptance Review process. The table used for the Bellefonte review is consistent with the table used for the review of the South Texas Environmental Report however, in several technical areas additional items were included.

If you have any questions regarding this letter report or the attached table, please call Robert Bryce at 509-373-3586 or Eva Hickey at 509-375-2065.

Sincerely,



Robert W. Bryce  
Project Team Leader  
Site Characterization and Risk Assessment Group  
Energy and Environment Directorate

**Attachments:**

Attachment 1: Table 1. Environmental Report Acceptance Review. Bellefonte Project Units 3 and 4.

Attachment 2: Table 1 Bellefonte Information Needs

Cc w/attach.: Elinor Cunningham  
Eva Hickey

**Table 1. Bellefonte Environmental Report Acceptance Review**

1. Issue Area/Topic (ESRP, Reg or RG Section)	Sufficiency Review Question  Is the following material found and cited in the Environmental Report, Site Safety Analysis Report, or Site Redress Plan?	Completeness and Technical Sufficiency Which Form Basis for Acceptability for Docketing				Changes to Planning Assumptions to be Considered in Development of Baseline Review Schedule			Review Dependencies Among Concurrent Reviews	
		2. Does the ER address the items required by regulation (refer to 10 CFR 52.80(b) and RG 4.2? (Completeness) (Yes/No)	3. Is ER issue area technically sufficient for this review area/topic? (Sufficiency) (Yes/No)	4. Can the technical deficiency be resolved through the RAI process or at the site audit? (Yes/No)	5. If no, for either completeness or technical sufficiency, identify deficiency(ies) and provide details. Note specific section in the ER applicable to the deficiency.	7. Are the pre-baseline review schedule and estimated staff-hours appropriate for the issue area? (Yes/No) Answer yes if 2, 3, and 4 are yes. No, if 4 is no.	8. For each no, identify the change (or basis for change). (If able to estimate the impact, labor effort, or schedule delay, provide estimate. Otherwise leave blank.)	9. Identify the total review time in staff-hours. (Leave blank.)	10. Can the review of the issue area be completed without the completion of a concurrent review? (Is the section technically bound to another ESRP section?) (Yes/No)	11. For each no, identify which issue area section. Provide the ESRP section number and title impacted by the noted deficiency.
1.1	Full names of all organizations (e.g., utilities and municipalities) sharing ownership of the proposed project.	Yes	Yes	NA						
1.1	Name of the organization designated as the applicant. This organization is the contact with NRC during the licensing process and will be responsible for construction and operation of the proposed project.	Yes	Yes	NA						
1.1	Site location with respect to nearby towns and natural features.	Yes	Yes	NA						
1.1	Number and type of reactors, highest anticipated gross thermal megawatt output, and net electrical output.	Yes	Yes	NA						
1.1	Cooling system description (intake type, heat dissipation type, discharge type, source of cooling water).	Yes	Yes	NA						
1.1	Transmission system description (kilometers of new corridors, new towers or conductors on existing corridors).	Yes	Yes	NA						
1.1	The nature of the proposed action and the constraints that are placed on the review because of the type of action.	Yes	No	Yes	The constraints placed on the review because of the type of action are not listed.					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
1.1	Proposed dates for start and completion of major activities.	Yes	Yes	NA						
1.2	The name of each related authorization, including the responsible agency and the applicable law, ordinance, or regulation.	Yes	Yes	NA						
1.2	The date of application/initiation and scheduled date of issuance of each authorization.	Yes	No	Yes	The dates of initiation and issuance of authorizations are not included.					
1.2	The current status of each authorization (from consultation with Federal, State, regional, local, and affected Native American tribal agencies).	Yes	Yes	NA						
1.2	The principal environmental factors to be covered by the authorization.	Yes	Yes	NA						
2.1	Site location: State; county; latitude and longitude Universal Transverse Mercator (UTM) coordinates; and township, range, and section(s).	Yes	No	Yes	Township and Range not included.					
2.1	Area of the site.	Yes	Yes	NA						
2.1	Distance and direction from the nearest major city.	Yes	Yes	NA						
2.1	Distance and direction from several nearby towns and readily recognized landmarks, including major nearby highways, rivers, or other bodies of water, within 10 km (6 mi) of the facility site.	Yes	Yes	NA						
2.1	For geographical orientation, simplified maps (based on an official source of information such as a State highway map) centered on the facility site: one general map with about an 80-km (50-mi) radius and a second map with about a 10-km (6-mi) radius of the facility (orient true north at the top of the map).	Yes	Yes	NA						
2.1	High-oblique aerial view or perspective drawing of the site with an indication of the facility boundary (facility site should occupy about 10% of the view) (from the ER upon request [reproducible copy] from the applicant).	Yes	Yes	NA						

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
2.2.1	Land areas (hectares) devoted to major uses within the site boundary.	Yes	Yes	NA						
2.2.1	Maps showing major land uses in the site vicinity with land uses classified consistently with standard U.S. Geological Survey categories.	Yes	Yes	NA						
2.2.1	Egress limitations from the area surrounding the site.	Yes	Yes	NA						
2.2.1	Mineral resources (e.g., sand and gravel, coal, oil, natural gas, and ores) adjacent to or within the site boundary presently being exploited or of known commercial value.	Yes	Yes	NA						
2.2.1	Special land uses (e.g., recreation) other than major land uses in the site and vicinity that could be significantly affected by construction of the proposed project (from consultation with local agencies).	Yes	Yes	NA	Additional information in 2.5.2					
2.2.1	Ownership of mineral resources (i.e., whether the mineral resources are owned by the surface landowner or by another owner).	Yes	Yes	NA						
2.2.1	Land-use plans that include the site and vicinity within their scope (from applicable Federal, State, regional, local, and affected Native American tribal planning agencies).	Yes	Yes	Yes	Local planning documents referred to, but not cited in 2.5.2.					
2.2.2	Proposed routes for corridors that will be used for construction of transmission lines from the station site to an interconnecting point or points on the existing high-voltage transmission systems.	NA	NA	NA	Corridor and ROW already in place.					
2.2.2	Proposed routes of access corridors to serve the proposed station.	NA	NA	NA						
2.2.2	Transmission corridor lengths, widths, and areas.	Yes	Yes	NA	See Section 3.7					
2.2.2	Land-use restrictions, if any, contained in any easements (from consultation with land resource agencies).	NA	NA	NA						
2.2.2	Land use within the transmission corridors using the categories defined by the U.S. Geological Survey. Land-use information should be sub- divided into corridor segments having predomi- nantly similar land-use types (from consultation with applicable Federal, State, regional, local, and affected Native American tribal agencies).	Yes	No	Yes	As the applicant is proposing to use existing corridors, land-use specifics are less important; however, it may be necessary to obtain					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
					further descriptions of these corridors with regard to terrestrial and cultural issues. Section 3.7 refers to surveys completed on topic during original application, but no details are provided.					
2.2.2	Identification of offsite areas by land use, size, and location (from site visit, and consultation with Federal, State, regional, local, and Native American tribal agencies).	NA	Yes/ NA	NA	Some identified in maps and text.					
2.2.2	Local and regional land-use plans of State, regional, and local agencies (from consultation with Federal, State, regional, local, and affected Native American tribal agencies).	NA	Yes/ NA	NA	Some land-use plans are referred to in text (Section 2.5.2).					
2.2.2	Special land-use classifications (e.g., Native American or military reservations, wild and scenic rivers, State and national parks, national forests, designated coastal-zone areas, floodplains, wildlife refuges, and wilderness areas) (from consultation with Federal, State, regional, local, and affected Native American tribal agencies).	NA	Yes/ NA	NA	Most included in either text or land-use maps.					
2.2.3	Maps showing major land use within the region. Land-use categories should be consistent with those defined by the U.S. Geological Survey (from consultation with resource agencies).	Yes	Yes	Yes	Map exists – Figure 2.2-1, but unable to distinguish land types with black and white shading					
2.2.3	Land areas devoted to major uses within the region.	Yes	Yes	NA						
2.2.3	Principal agricultural products of the region and average annual yields.	Yes	Yes	NA						
2.2.3	Maps showing the major transportation and utility networks within the region.	Yes	Yes	Yes	Figs 1.1-1, 2.5-5, 2.5-6, but no other utilities (e.g., gas lines) included.					
2.2.3	Maps showing major public and trust land areas in the region.	Yes	Yes, some text,	Yes	Text description of public land exists in ER and maps are					



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		2.	3.	4.	5.	7.	8.	9.	10.	11.
			but no map		readily available online from AL Dept of Conservation. Also major land trusts are available at: <a href="http://www.allandtrust.org/ce_map.htm">http://www.allandtrust.org/ce_map.htm</a>					
2.2.3	Maps showing the major transportation and utility networks within the region.	Yes	Yes	Yes	Section 2.2.2 refers to Figure 1.1-5. Some discrepancy between text description and figure.					
2.3.1	For surface-water bodies used as a heat sink, maximum, average-maximum, average, average-minimum, and minimum monthly temperature of the water body	Yes	Yes	NA						
2.3.1	For surface-water bodies and wetlands, estimated erosion characteristics and sediment transport, including rate, bed, and suspended load fractions, and graduation analyses; a description of the floodplain and its relationship to the site; a description of wetlands and their relationship to the site; the design-basis flood (DBF) elevation; and, where applicable, the DBF discharge.	Yes	Yes	NA						
2.3.1 (estuaries and oceans only)	<ul style="list-style-type: none"> <li>- shoreline and bottom descriptions, including seasonal variations due to sediment transport</li> <li>- tidal current patterns (velocities and phases), range, and excursion</li> <li>- nontidal circulation patterns, including frequency distributions of current speed, direction, and persistence</li> <li>- temperature and salinity distribution (horizontal and vertical), including temporal variations</li> <li>- detailed bathymetry in the vicinity of the station intake and outfall</li> <li>- for estuaries, maximum, average maximum, average, average minimum, and minimum monthly river discharge and flushing characteristics</li> </ul>	NA	NA	NA						

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
2.3.1 (fresh water streams only)	<ul style="list-style-type: none"> <li>- a list of major streams, size of drainage areas, and gradient</li> <li>- maximum, average maximum, average, average minimum, and minimum monthly flow</li> <li>- flood frequency distributions, including levee failures</li> <li>- flood control measures (reservoirs, levees, flood forecasting)</li> <li>- historical drought stages and discharges by month, and the 7-day once-in-10-years low flow</li> <li>- important short-duration flow fluctuations (e.g., diurnal release variations from peaking operation of upstream hydroelectric project)</li> <li>- within the influence of the intake and discharge structures, velocity distribution (horizontal and vertical), bathymetry at and near the intake structure, bathymetry at and downstream of the discharge structure, and stream cross-sections</li> <li>- other hydrographic modifications (e.g., diversion dams, channelization)</li> <li>- a list of wetlands and flood plains and their seasonal characteristics</li> </ul>	Yes	Yes	NA						
2.3.1 (ground- water)	<ul style="list-style-type: none"> <li>- the areal extent of aquifers, recharge and discharge areas, elevation and depth, and geologic formations</li> <li>- piezometric contour maps and hydraulic gradients (historical, if available, and current)</li> <li>- flow travel times</li> <li>- soil properties, including permeabilities or transmissivities, storage coefficients or specific yields, total and effective porosities, clay content, and bulk densities</li> <li>- interactions between site surface and groundwaters</li> <li>- historical and seasonal trends in ground-water elevation or piezometric levels; interactions between different aquifers</li> <li>- recharge rates, soil moisture characteristics,</li> </ul>	Yes	Yes	NA	Note: Interpretations in the vicinity of the intake structure and raw water supply line in the 2005 contour maps appear to be highly dependent on Well W29, and not consistent with current data and interpretations (see Section 2.3.1.5.5, and Figures 2.3-22, 2.3-23).  Hydraulic properties					

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	<ul style="list-style-type: none"> <li>and moisture content in vadose zone</li> <li>– existence of any local aquifers designated or proposed to be designated as “sole source aquifers.”</li> </ul>				of the backfill materials in the raw water line trench from the original construction are not distinguished from natural materials. This man-made feature may present a shortened pathway from Unit 4 to Gunterville Reservoir.					
2.3.1 (lakes and impoundments only)	<ul style="list-style-type: none"> <li>– a description of lake or impoundment where influenced by the intake or discharge structures, or vice versa, size, location, and elevation of outlets</li> <li>– a summary description of reservoir operating rules</li> <li>– annual yield and dependability</li> <li>– variations in inflows, outflows, water surface elevations, and storage volumes and retention time</li> <li>– net loss, including evaporation and seepage</li> <li>– current patterns, including frequency distributions of current speed, direction, and persistence</li> <li>– temperature distribution (horizontal and vertical) and stratification and seasonal variations of density-induced currents</li> <li>– detailed bathymetry in vicinity of station intake and outfall</li> </ul>	Yes	No	Yes	Note: Detailed bathymetry data base may not be present in the references. The color shaded and contoured map (Section 2.3.1.2.5, Figure 2.3-9) may not be sufficient, and a data base of the bathymetry data may be required to support analyses and the creation of maps and figures in the EIS.				No	5.3 Cooling System Impacts
2.3.1 and 2.3.2	<p>Maps (including digital databases such as a Geographic Information System [GIS]) of sufficient detail to show the relationship of the site to major hydrological systems that could affect or be affected by plant construction or operation. These should include:</p> <ul style="list-style-type: none"> <li>– maps showing the relationship of the site to surface-water bodies that could affect or be affected by plant water use</li> <li>– maps (and cross sections where feasible)</li> </ul>	Yes	Yes	NA						

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
	showing those portions of groundwater aquifer systems that could be affected by plant withdrawals and/or discharges									
2.3.2	Quantitative description of present and known future surface-water uses (withdrawals, consumptions, and returns) that are within the hydrological system in which the site is located and that may affect or be affected by the plant. This should include a quantitative description of any water uses that provide potential liquid pathways for both radiological and nonradiological effluents. The following should be included for each withdrawal or discharge: <ul style="list-style-type: none"> <li>- locations of diversions and returns with respect to the site and the water body (from the site visit, the general literature, and consultation with Federal, State, regional, local, and affected Native American tribal agencies)</li> <li>- identification of the water body (from the ER and the general literature)</li> <li>- the average monthly withdrawal and return rate for each diversion by use category</li> </ul>	Yes	No	Yes	Average monthly return rates for each diversion by use category do not appear in the supporting table (i.e., Section 2.3.2.2, Table 2.3-28).  Table 2.3-31 showing local surface water users omits distance and location infor- mation per 10 CFR 2.390(a)(3). This table does not address low volume domestic users adjacent to Towne Creek.  In Section 2.3.2.4, the applicant states that the potential construction and operation of Units 3 and 4 was not considered in the future forecast. During the site audit, need to learn more about their forecast process, and if other nuclear facilities were included, e.g., BFN, WBN).				Yes	
2.3.2	Quantitative and qualitative description of recreational, navigational, instream, and other nonconsumptive present and known future water uses. For a 10-km (6-mi) radius, this should	Yes	No	Yes, or likely	The applicant states in Section 2.3.2.2 that “Quantitative estimates for	Depends on acceptance of qualitative			No	Sections on socio-economics and aquatic biology.

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	include the following (from the ER, site visit, peer-reviewed technical literature, and consultation with Federal, State, regional, local, and affected Native American tribal agencies): – identification of water bodies and locations with respect to the site (maps may be useful) – the kind and location of activity on the water body (maps may be useful) – the use rate with time variation.				instream water use within the Tennessee River Basin watershed have not been completed to date.”	statements by socio- economics and aquatic ecology.				
2.3.2	Summary of statutory and other legal restrictions relating to water use or specific water-body restrictions on water use imposed by Federal or State regulations	Yes	Yes	NA						
2.3.2	Descriptions of pollutant sources with discharges to water that may interact with the plant, including locations relative to the site and the affected water bodies, and the magnitude and nature of the pollutant discharges, including spatial and temporal variations	Yes	Yes	NA						
2.3.2 and 3.3.1	A water-use diagram for the plant showing: – flow rates to and from the various water systems (e.g., circulating water system, sanitary system, radwaste and chemical waste systems, service water systems) – points of consumption – source and discharge locations A water-use diagram of other station water uses (i.e., all facilities not associated with the proposed plant) showing: – flow rates to and from the facility – average water consumption – maximum water consumption Data and narrative description for: – various plant water systems, their interconnections, and their operational interdependence and coordination – maximum water consumption – water consumption during periods of minimum water availability – average operation by month and by plant operating status	Yes	Yes	NA						

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
2.3.3	<p>The mean, range, and temporal and spatial variations of the surface-water and groundwater-quality characteristics.</p> <p>For surface waters: water temperature, suspended solids, total dissolved solids, hardness, turbidity, color, odor, conductivity, dissolved oxygen, biological oxygen demand (BOD), chemical oxygen demand (COD), phosphorus forms (total and orthophosphate), nitrogen forms (ammonia, nitrate, nitrite, organic), alkalinity, chlorides, sulfate, sodium, potassium, calcium, magnesium, heavy metals (e.g., Hg, Pb), pH, phytoplankton (chlorophyll <i>a</i>), and indicator microorganisms (e.g., total coliform, fecal coliforms, fecal streptococci)</p> <p>For groundwaters: the above surface-water data, minus phytoplankton and with silica, iron, carbon dioxide, and bicarbonate added</p>	Yes	Yes	NA						
2.3.3	Descriptions, such as 303(d) lists, of pre-existing aquatic environmental stresses and their effects on surface or groundwater quality for waters that interact with the plant (e.g., water bodies at or near the site that do not meet established water-quality standards)	Yes	Yes	NA						
2.4.1	Has the applicant identified the species and habitats that will be considered “important” ecological resources of the site, vicinity, transmission corridors, and offsite areas for evaluation of potential impacts on them? Did the applicant include a map that identifies “important” terrestrial habitats on and in the vicinity of the site?	Yes	No	Yes	Figures depicting habitats and other spatial data are difficult to discern in black-and-white format.					
2.4.1	Did the applicant describe any “important” species and their spatial and temporal distributions on and in the vicinity of the site, including, as appropriate, their relative abundance, critical habitat, and their life histories—critical life stages, biologically significant activities, seasonal habitat requirements and population fluctuations, food	Yes	No	Yes	Information on bat distribution insufficient (i.e., manmade structures). Location of suitable habitat for important species (bats, plants), both in and out of the					

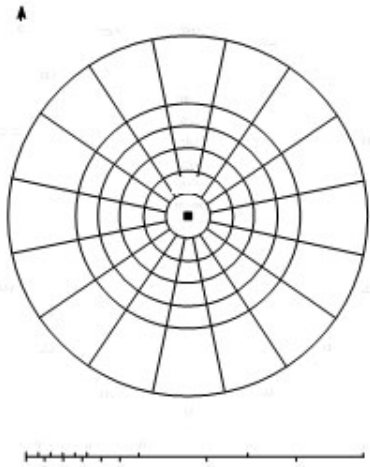
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		2.	3.	4.	5.	7.	8.	9.	10.	11.
	chain, and other interspecific relationships?				proposed construction zone, not spatially explicit.					
2.4.1	Has the applicant consulted with local offices of the appropriate Federal, State, regional, local, and affected Native American tribal agencies to determine the possible presence of such species?	Yes	Yes	NA						
2.4.1	Did the applicant identify and describe the species' composition, the spatial and temporal distribution, abundance, and other structural and functional attributes of biotic assemblages that could be impacted by the proposed action?	Yes	Yes	NA			Will require review of additional data if data is provided by applicant. If not, then it will require literature search; may not be possible if no data exists.			
2.4.1	Did the applicant identify and describe the location of wildlife sanctuaries and natural areas that might be impacted by the proposed action?	Yes	Yes	NA						
2.4.1	Did the applicant list of species that are of concern as disease vectors or pests?	Yes	Yes	NA						
2.4.1	Did the applicant describe the natural and man-induced effects (e.g., farming, logging, grazing, and burning), preexisting environmental stresses (e.g., infestations, epidemics, and catastrophes), and the current ecological conditions that are indicative of such stresses?	Yes	Yes	NA						
2.4.1	Did the applicant describe the location of any ecological or biological studies of the site or its environs that are recent or currently in progress?	Yes	No	Yes	Are there any studies being conducted in special management areas nearby (Mud Creek, Coon Gulf, etc.)?					
2.4.1	Did the applicant identify any important waterfowl areas in the proposed transmission lines cross, a list of descriptions of these areas and data on the local abundance and distribution of waterfowl, their seasonal status, and local flight patterns?	Yes	No	Yes	Although it was determined Alabama is between flyways, waterfowl species are listed as occurring on the site and habitats are present but not sufficiently described.					

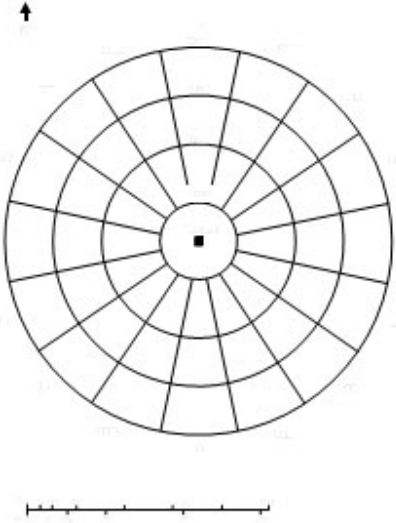
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		2.	3.	4.	5.	7.	8.	9.	10.	11.
2.4.1	Is the available site-specific data adequate, accurate, and complete?	Yes	No	Yes	If proper and valid surveys for important species are not conducted, case must be very strong why they were not or are not needed. Habitat types of important species (plants, bats) appear to exist on the site and within the impact zone, and USFWS recom- mended surveys during flowering/ fruiting, yet winter surveys were conducted. No evidence of USFWS approval of winter survey as stated in Section 2.4.1.4.1 unless this is when plants are flowering or fruiting.					
2.4.2	Has the applicant identified the species and habitats that will be considered “important” ecological resources of the site, vicinity, transmission corridors, and offsite areas for evaluation of potential impacts on them? Did the applicant include a map that identifies “important” aquatic habitats or bodies of water on and in the vicinity of the site?	Yes	No	Yes	2.4.2.5.3 No identification of presence or absence of “Commercial fishery” or type of such fishery					
2.4.2	Did the applicant describe any “important” species and their spatial and temporal distributions on and in the vicinity of the site (discharge area and receiving water body), including, as appropriate, their relative abundance, critical habitat, and their life histories—critical life stages, spawning areas, nursery grounds, food habits, feeding areas, wintering areas, migration areas?	Yes	No	Yes	2.4.2 Described important species. Some spatial and temporal data on the listed species. Referenced surveys on two species but did not include maps or info other than “adjacent to the					



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		2.	3.	4.	5.	7.	8.	9.	10.	11.
					BLN”. 2.4.2.5.3 No information on commercial fishery or absence of commercial fishery.					
2.4.2	Has the applicant consulted with local offices of the appropriate Federal, State, regional, local, and affected Native American tribal agencies to determine the possible presence of such species? Determine when was the last time there was consultation with agencies.	Yes	Yes	Yes						
2.4.2	Did the applicant identify and describe the species composition, the spatial and temporal distribution, abundance, and other structural and functional attributes of biotic assemblages that could be impacted by the proposed action?	Yes	No	Yes	2.4.2.1 Species composition. Not much information on intake canal or on Town Creek Embayment beyond “Aquatic communi- ties have been extensively studied” and “productive ecosystem and is characterized by diverse aquatic fauna and flora.  2.4.2.4 For river, the assumption is made that the fish community is substantially similar from TRM 375.2 to TRM 424.0. But that data is not in the ER. Habitat and life histories described in general by Family – not specifics by species.  2.4.2.1.3 Onsite ponds – “Other					

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					populations migrated from surrounding areas and are therefore, not considered rare or unique to the onsite pond habitats". There is no data, such as species lists to back this statement.					
2.4.2	Did the applicant identify and describe the location of wildlife sanctuaries and natural areas that might be impacted by the proposed action?	Yes	Yes	NA						
2.4.2	Did the applicant list species that are of concern as disease vectors or pests? Did the applicant list any nuisance or invasive species of concern (e.g., <i>Corbicula</i> sp. or <i>Mytilus</i> sp.)? These species are capable of blocking or bio-fouling the cooling water intake system or can cause other significant problems.	Yes	No	Yes	2.4.2.5.4 Will need clarifying information and data from the April 2007 survey.					
2.4.2	Did the applicant describe the natural and man-induced effects (e.g., farming, logging, grazing, burning), preexisting environmental stresses (e.g., infestations, epidemics, catastrophes), and the current ecological conditions that are indicative of such stresses?	Yes	Yes	NA	Dam, drought					
2.4.2	Did the applicant describe the location of any ecological or biological studies of the site or its environs that are recent or currently in progress?	Yes	No	Yes	2.4.2.4 Location of studies only generally described. References are not cited. Data from study is too high level for an adequate review (species identified based on year, rather than number of individuals, locations of sampling etc. We will need references to the studies and data presented to show the results based on sampling location; sampling					

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					gear, techniques; sampling times, number of individ- uals, etc., then the review can be completed in given amount of time.					
2.4.2	Is the available site-specific data adequate, accurate, and complete?	Yes	No	Yes	2.4.2.4 Site-specific data is not provided or referenced. Studies are mentioned. If data is available then RAIs will be adequate to resolve this issue.					
2.5.1	Sector chart superimposed on a map of the site vicinity extending to a 16-km (10-mi) radius:  	Yes	Yes	NA	Explanation of methodology needed for review. In these charts, for example, it is unclear whether the projections include specific population increasing activities, such as the anticipated BRAC and the plant.					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
2.5.1	Sector chart superimposed on a map of the site region extending to an 80-km (50-m) radius:  	Yes	Yes	NA					No	Sections 7 and 8.
2.5.1	Table appropriately keyed to Figures 1 and 2 that provides the projected populations within each sector of the chart.	Yes	Yes	NA					No	Sections 7 and 8.
2.5.1	Demographic Characteristics of the 0-km to 80-km (0-mi to 50-mi) Enclosed Population. This should include specific reporting of population characteristics and projections for the emergency planning zone defined as the area within a 16-km (10-mi) radius of the facility. Demographic characteristics and projections should also be shown for the “low-population zone” or “exclusion area” populations. Demographic characteristics should include age and sex distribution, transient or migrant population, racial and ethnic background, and income distribution (from the ER, latest decennial Census, other local/regional demographic sources such as planning commissions).	Yes	Yes	NA	Need information related to pertinent political jurisdictions or social groupings. Need to present population projec- tions in a way that trends are evident.				No	Sections 7 and 8.

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
2.5.2	Information related to the area's economic base, including: <ul style="list-style-type: none"> <li>- important regional industry by category, including employment</li> <li>- size and description of the heavy construction industry and construction labor force within the region</li> <li>- total regional labor force</li> <li>- regional unemployment levels and future economic outlook</li> <li>- characterization of incremental onsite labor, peak number of workers and duration of the peak, the number of workers expected to commute daily, the number of workers expected to require temporary and permanent housing, and the inventory of rental and of permanent housing within 80 km of the site.</li> </ul>	Yes	No	Maybe	Need detailed workforce information and regional expenditure information. Although the assumptions are quite conservative, they are not presented within an adequate framework, and there are no references supporting the basis for many assumptions. A referenceable source for this information is needed.	Maybe			No	Section 8 Need for Power
2.5.2	Information related to the area's political structure, including <ul style="list-style-type: none"> <li>- regional political jurisdictions and tax districts</li> <li>- identifying those tax districts that will be directly affected by facility construction or operation</li> <li>- local and regional planning and administrative organizations.</li> </ul>	Yes	Yes	NA	Clarify if these entities were consulted.					
2.5.2	Social-structure information, including major community structures.	No	No	Yes						
2.5.2	Housing information, including the sales and rental market in the region, number and types of units, turnover and vacancy rates, and trends in addition to housing stock, adequacy of structures, and location of existing and projected housing.	Yes	Yes	NA						
2.5.2	Information about the local educational system (regional primary and secondary schools and higher education institutions), including capacity and present percentage of use.	Yes	Yes	NA	No information about class size and trends. A referenceable source for this information is needed.					

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2.5.2	Public and private recreational facilities and opportunities, including present and projected capacity and percentage of use.	Yes	Yes	NA						
2.5.2	Regional tax structure and distribution of the present revenues to each jurisdiction and district.	Yes	No	Yes	Need information for the rest of the counties in the impact area.				No	Chapter 8, cost benefit; and Chapter 9, comparison of alternatives
2.5.2	Local plans concerning land use and zoning that are relevant to population growth, housing, and changes in land-use patterns.	Yes	Yes	NA	Text does not reflect consultation with local officials					
2.5.2	Social services and public facilities, including: <ul style="list-style-type: none"> <li>- present and projected water and sewer/sewage disposal facilities, including present capacity and projected percentage of use</li> <li>- present and projected police and fire capabilities, and emergency planning responsibilities</li> <li>- location of hospitals, number of medical doctors, and specialized health facilities, including present and projected capacity.</li> </ul>	Yes	Yes	NA					No	Chapter 7
2.5.2	Information on highways and transportation systems, for example: <ul style="list-style-type: none"> <li>- regional and local highway systems, including carrying capacity and condition of roads and highways</li> <li>- availability and type of public transportation</li> <li>- modifications that might affect traffic flow to and from the station site.</li> </ul>	Yes	No	Yes	Trend data and peak flow data is not presented.  A referenceable source for this information is needed.				No	Chapter 7?
2.5.2	Information about distinctive communities, including the characteristics of the State, Native American tribes, and the local region that may identify them as distinctive communities (e.g., historic districts, tourist attractions, cultural resources, and visual resources).	Yes	Yes	NA	Need social structure and qualitative or interpretive information about these individuals, in addition to census data provided.					
2.5.3	A detailed description of any archaeological or historical surveys of the proposed site, transmission line routes, or access corridors, including the physical extent of the survey,	Yes	No	Yes	Details of cultural resources surveys for the transmission lines are not clear (2.5.3).					

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	including why areas were not surveyed; techniques used; qualification so the surveyor; and findings.									
2.5.3	Comments of any organizations contacted by the applicant to locate and assess archaeological and historic resources located on or near the proposed station site.	Yes	No	Yes	Only the Alabama SHPO and affected Tribes in the region were contacted. More effort to contact historical organizations or family members who may continue to visit the two historic cemeteries located in closed proximity to the BLN site may be warranted (2.5.3, 4.1.3, and 5.1.3)					
2.5.3	A description of cultural resources within the proposed site, proposed transmission line routes, or access corridors, and offsite areas that are in or eligible for inclusion in the National Register or are included in State or local registers or inventories of historic and archaeological resources.	Yes	No	Yes	Details regarding cultural resources located within transmission line corridors are not clear (2.5.3, 4.1.3 and 5.1.3).					
2.5.3	A description of cultural resources within 16 km (10 mi) of the proposed site, or 2 km (1.2 mi) of proposed transmission line routes, or access corridors, and offsite areas that are in or eligible for inclusion in the National Register or are included in State or local registers or inventories of historic and archaeological resources.	Yes	Yes	NA						
2.5.3	A list of organizations and individuals contacted by the applicant also provided significant information concerning the location of cultural and historical properties.	Yes	No	Yes	Only the Alabama SHPO and affected Tribes in the region were contacted. More effort to con- tact historical organi- zations or family members who may continue to visit the two historic ceme- teries located in					

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					closed proximity to the BLN site may be warranted (2.5.3, 4.1.3, and 5.1.3)					
2.5.4	Comments of any organizations contacted by the applicant that locate and assess uniquely vulnerable minority and low-income communities located on or near the proposed station site.	No	No	Yes	Provide information on organizations contacted in Section 2.5.4					
2.5.4	General description (with maps) of the location of all minority and low-income populations within the environmental impact area of each alternative site, including offsite areas that can expect significant environmental impact as a result of the proposed project construction or operation.	Yes	Yes	NA	Clarify if the analysis considered all pertinent patterns for examination (for example, along roadways).					
2.5.4	More specific description of any unique minority or low-income communities within each environmental-impact area that are likely to be disproportionately affected by the proposed project construction or operation.	Yes	No	Yes	Not clear that analy- sis was adequate. There may be popu- lations that need to be examined more carefully.					
2.7	A description of the general climate of the region with respect to the type of air masses, synoptic features, general air flow patterns, temperature and humidity characteristics, precipitation, and relationships between synoptic and mesoscale conditions.	Yes	Yes	NA						
2.7	A description of the regional air quality, including nonattainment or maintenance areas.	Yes	Yes	NA						
2.7	A description of severe weather phenomena and its frequency.	Yes	Yes	NA						
2.7	Monthly and annual air temperature and dewpoint temperature summaries, including averages, extremes, and diurnal range.	Yes	No	Yes	Dewpoint tempera- ture summary infor- mation not included					
2.7	Monthly and annual summaries, including natural variability, occurrences of heavy fog, and appropriate summaries of other relevant parameters to support the description of impacts resulting from the operation of a closed-cycle heat dissipation system.	Yes	Yes	NA						



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2.7	Estimated monthly mixing-height data, including frequency and duration (persistence) of inversion conditions and the methods used to provide the estimates.	Yes	Yes	NA						
2.7	Monthly and annual wind roses at all height(s) at which data on wind characteristics are applicable.	Yes	Yes	NA						
2.7	Monthly and annual summaries of atmospheric stability.	Yes	Yes	NA						
2.7	Short- and long-term diffusion estimates of normalized concentration ( $\chi/Q$ ) and/or relative deposition ( $D/Q$ ) and the period of onsite meteorological data used in the calculations.	Yes	Yes	NA						
2.8	The ER or SSAR/FSAR should provide some indication of other nearby industrial facilities, other nuclear facilities in the region, or other Federal projects existing in the region or that might be required to construct and operate the proposed facility.	Yes	No	Yes	Nearby industrial facilities and other nuclear facilities in the region are not listed.					
2.8	Descriptions of Federal actions associated with acquisition and/or use of the proposed site and transmission corridors or of any other offsite property needed for the proposed project.	NA	NA	NA	No federal actions identified.					
2.8	Descriptions of planned Federal projects that will be required either to provide an adequate source of facility cooling water or to ensure an adequate supply of cooling water over the operating lifetime of the facility (from consultations with Federal, State, local, and affected Native American tribal agencies).	NA	NA	NA	No planned projects identified.					
2.8	Descriptions of any other planned Federal projects or activities that must be completed as a condition of facility construction or operation (from consultations with appropriate Federal agencies).	NA	NA	NA	No activities identified.					
2.8	Federal agency plans or commitments that will result in significant new power purchases within the applicant's service area that have been used to justify a need for power (from consultation with appropriate Federal agencies).	NA	NA	NA	There are no federal agency plans that result in new power purchases within TVA's service area.					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
2.8	Descriptions of planned Federal projects that are contingent on facility construction and operation (from consultation with appropriate Federal agencies).	NA	NA	NA	No contingencies identified.					
3.1	Topographic maps of the site and vicinity (refer to ESRP 2.2) showing facility and station layout, the exclusion area, site boundary, liquid and gaseous release points (and their elevations), meteorological towers, the construction zone, land to be cleared, waste disposal areas, and other buildings and structures (both temporary and permanent) associated with the project.	Yes	No	Yes	A topographic map is provided, along with some other figures, but these lack some of the required detail, i.e., liquid and gaseous release points (elevations of gaseous release points are given in the text), meteorological towers.					
3.1	Description of the station, including proposed plans to seclude and screen the facilities and to architecturally integrate the buildings and landscaping into the environs.	Yes	No	Yes	The ER does not address plans to seclude and screen the facility.					
3.1	Aesthetic principles and concepts used in the facility design and layout.	Yes	Yes	NA						
3.1	Representative ground-level photographs of the site on which major station features are super imposed. These should be taken from among the following typical vantage points when a visual impact from that location can be expected: - residential - commercial - industrial - educational - transportation corridors (air, auto, rail, pedestrian) - cultural (recreational, historic, archaeological).	Yes	Yes	NA						
3.1	Low, oblique aerial photograph of the site and vicinity on which major station features are super imposed.	Yes	Yes	NA						

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3.1	An architectural rendering of the proposed project to include landscaping and all major station features.	Yes	No	Yes	The ER does not address landscaping plans.					
3.3.1	A narrative description of the various plant water systems, their interconnections, and their operational interdependence and coordination	Yes	Yes	NA						
3.3.2	A description and purpose of the water treatment systems used in the plant including: <ul style="list-style-type: none"> <li>- identification, quantities, and points of addition of chemicals and additives to be used by each system</li> <li>- operating cycles for each water treatment system for normal modes of plant operation (e.g., full power operation, shutdown/refueling, and startup)</li> </ul>	Yes	Yes	NA						
3.4.1	Descriptions of anticipated operational modes and the estimated periods of time that the system will operate in each mode including: <ul style="list-style-type: none"> <li>- for each anticipated operational mode, quantities of heat generated, dissipated to the atmosphere, and released in liquid discharges</li> <li>- for each operational mode, water source and quantities of water withdrawn, consumed, and discharged.</li> </ul>	Yes	Yes	NA	Note: Section 3.4.1.2 provides the timing of operational modes, and Tables 3.4-1 and 3.4-2 provide the estimated heat transfer and raw water demand for the modes. However, on inspection, the startup water demand and startup heat transfer appear out of sync. Startup appears to be defined differently in these two adjacent tables.					
3.4.1	Status of the NPDES permit and any 316(a/b) demonstrations	Yes	Yes	NA						
3.4.2	For INTAKE SYSTEMS, include: <ul style="list-style-type: none"> <li>- a drawing of the intake structure showing the relationship of the structure to the water surface, bottom geometry, and shoreline</li> <li>- a description of the cooling water pumping facility</li> <li>- a description of the trash racks, traveling</li> </ul>	Yes	Yes	NA	Note: Section 3.4.2.1 and Figure 3.4-2 do not provide a complete description of the traveling screens, the size of which is key					

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	<ul style="list-style-type: none"> <li>– screens, trash baskets, and fish return devices</li> <li>– performance characteristics (e.g., flow rates, intake velocities) for the operational modes identified by the reviewer for ESRP 3.4.1</li> <li>– performance characteristics for specific intake related functions, such as de-icing, trash rack clearing, screen washing, trash basket removal, or fish return system operation</li> <li>– the location and description of components for the addition of chemicals (e.g., corrosion inhibitors, antifouling agents) to the intake system</li> </ul>				<p>to calculating the water velocity approaching the screen. Only the width of the moving screens is given.</p> <p>We can perform the review with the information provided, however, it may result in a permit condition.</p>					
3.4.2	<p>For DISCHARGE SYSTEMS, include:</p> <ul style="list-style-type: none"> <li>– drawings of the outfall structure, showing its location in the receiving water body, relationship to water surface, bottom geometry, and shoreline</li> <li>– a description of discharge canal or discharge lines</li> <li>– performance characteristics (e.g., discharge flow rates, discharge velocities, discharge temperatures, and temperature differentials) for the operational modes identified by the reviewer for ESRP 3.4.1</li> <li>– descriptions of specific discharge related components (e.g., diffusers, fish barriers)</li> </ul>	Yes	Yes	NA						
3.4.2	<p>For HEAT DISSIPATION SYSTEMS, include:</p> <ul style="list-style-type: none"> <li>– the location of heat dissipation system components relative to other site features</li> <li>– the design details of heat dissipation system components affecting system performance including the cooling towers, cooling lakes and ponds, spray ponds or canals, and condensers (once-through systems) (see Table 3.4.2-1 and -2 of the ESRP)</li> <li>– site-specific meteorological data (from ESRP 2.7)</li> <li>– site-specific water supply data (from ESRP 2.3.1)</li> <li>– heat dissipation system performance analyses based on the manufacturer’s design</li> </ul>	Yes	Yes	NA						

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	data and site-specific meteorological and hydrological data									
3.5	Sources of radioactive liquid and gaseous waste within the facility.	Yes	Yes	NA	References the DCD Rev. 16					
3.5	Description of liquid and gaseous radioactive waste management and effluent control systems.	Yes	Yes	NA	References the DCD Rev. 16					
3.5	Process flow diagrams for liquid and gaseous radioactive waste management and effluent control systems.	Yes	Yes	NA	References the DCD Rev. 16					
3.5	Identification of principal release points for radioactive materials to the environment.	Yes	Yes	NA	References the DCD Rev. 16					
3.5	Identification of direct radiation sources within or onsite out-of-plant as solid waste (e.g., independent fuel storage).	Yes	Yes	NA	References the DCD Rev. 16					
3.5	Information relevant to estimating radioactive liquid and gaseous effluents.	Yes	Yes	NA	References the DCD Rev. 16					
3.5	For ESP reviews, additional information from the applicant is needed to further define the radiological effluent information submitted pursuant to 10 CFR 52.17(a)(1)(iv).	Yes	Yes	NA	References the DCD Rev. 16					
3.6.1	Descriptions of nonradioactive effluent treatment facilities.	Yes	Yes	NA						
3.6.1	Average, maximum, and seasonal variations of principal constituents of intake and receiving waters and any minor or trace materials that may be of environmental relevance.	Yes	Yes	NA						
3.6.1	A list of chemicals processed through each system (e.g., corrosion inhibitors and antifouling agents) and total amounts used per year, frequency of use, and concentrations of these chemicals or their products in each waste stream.	Yes	Yes	NA						
3.6.1	The concentration factor on a seasonal basis for evaporative cooling systems.	Yes	Yes	NA						
3.6.1	The average and maximum concentration of natural materials in effluent streams.	Yes	Yes	NA						
3.6.1	The operating cycles for each effluent treatment system for normal modes of facility operation (e.g., full power operation, shutdown/refueling, and startup).	Yes	Yes	NA						

1. Issue Area/Topic (ESRP, Reg or RG Section)	Sufficiency Review Question  Is the following material found and cited in the Environmental Report, Site Safety Analysis Report, or Site Redress Plan?	Completeness and Technical Sufficiency Which Form Basis for Acceptability for Docketing				Changes to Planning Assumptions to be Considered in Development of Baseline Review Schedule			Review Dependencies Among Concurrent Reviews	
		2.	3.	4.	5.	7.	8.	9.	10.	11.
3.6.1	The following list of data should be obtained: <ul style="list-style-type: none"> <li>- descriptions of nonradioactive effluent treatment facilities</li> <li>- average, maximum, and seasonal variations of principal constituents of intake and receiving waters and any minor or trace materials that may be of environmental relevance</li> <li>- a list of chemicals processed through each system (e.g., corrosion inhibitors, antifouling agents), and total amounts used per year, frequency of use, and concentrations of these chemicals or their products in each waste stream</li> <li>- the concentration factor on a seasonal basis for evaporative cooling systems</li> <li>- the average and maximum concentration of natural materials in effluent streams</li> <li>- the operating cycles for each effluent treatment system for normal modes of plant operation (e.g., full power operation, shutdown/refueling, startup).</li> </ul>	Yes	Yes	NA						
3.6.2	A description of the systems (both temporary and permanent) to be provided.	Yes	Yes	NA	Notes: Section 4.2.1.3 states that portable toilet facilities <u>are</u> utilized during construction.  Section 3.6.2 states that sanitary systems needed during pre-construction and construction <u>include</u> portable toilets.  Section 10.4.2.2.3 states "...water use may be reduced <u>if</u> portable toilets are used..."					
3.6.2	Anticipated quantity and characteristics of treated effluents.	Yes	Yes	NA						

1. Issue Area/Topic (ESRP, Reg or RG Section)	Sufficiency Review Question  Is the following material found and cited in the Environmental Report, Site Safety Analysis Report, or Site Redress Plan?	Completeness and Technical Sufficiency Which Form Basis for Acceptability for Docketing				Changes to Planning Assumptions to be Considered in Development of Baseline Review Schedule			Review Dependencies Among Concurrent Reviews	
		2.	3.	4.	5.	7.	8.	9.	10.	11.
3.6.2	The ultimate disposal of treated effluents.	Yes	Yes	NA						
3.6.2	Standards for the proposed sanitary system effluents.	Yes	Yes	NA						
3.6.2	The National Pollutant Discharge Elimination System (NPDES) permit.	Yes	Yes	NA						
3.6.2	The following list of data should be obtained: – a description of the systems (both temporary and permanent) to be provided – anticipated quantity and characteristics of treated effluents – the ultimate disposal of treated effluents – standards for the proposed sanitary system effluents – a copy of the NPDES permit (if available).	Yes	Yes	NA	Notes: Section 4.2.1.3 states that portable toilet facilities <u>are</u> utilized during construction.  Section 3.6.2 states that sanitary systems needed during pre- construction and construction <u>include</u> portable toilets.  Section 10.4.2.2.3 states "...water use may be reduced <u>if</u> portable toilets are used..."					
3.6.3	Estimates of gaseous effluents (e.g., from diesel engines, gas turbines, heating plants, and incinerators) released during facility operation, the location and elevation of release points, the frequency of their release and their treatment before release, and the total quantity of SON, NON, hydrocarbons, and suspended particulates to be discharged annually.	Yes	Yes	NA						
3.6.3	Applicable Federal, State, and tribal regional standards concerning atmospheric emissions from consultation with Federal, State, regional, local, and affected Native American tribal agencies.	Yes	No	Yes	No discussion of applicable Federal, State, and tribal regional standards concerning atmos- pheric emissions in Section 3.6.3 or referenced sections.					
3.6.3	Information concerning nonradioactive wastes not considered in ESRPs 3.6.1 and 3.6.2, such as laboratory wastes, storm drainage, trash,	Yes	Yes	NA	Note: In Section 3.6.3.3,					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
	hazardous wastes, and debris from bars or screens on the cooling water intake. The description should include estimates of the quantities of wastes, their pollutant concentrations at points of release as appropriate to the system, and other relevant data.				concerning non-radioactive wastes not considered in ESRPs 3.6.1 and 3.6.2 – no estimates of quantities by the applicant.					
3.6.3	Procedures for any offsite disposal of wastes.	Yes	Yes	NA	Note: Applicant commits to use of off-site licensed/permitted facilities.					
3.6.3	Procedures by which all effluents will be treated, controlled, and discharged to meet State and U.S. Environmental Protection Agency effluent limitation guidelines and new source performance standards.	Yes	Yes	NA						
3.6.3	The following list of data should be obtained: <ul style="list-style-type: none"> <li>– estimates of gaseous effluents (e.g., from diesel engines, gas turbines, heating plants, incinerators) released during plant operation, the location and elevation of release points, the frequency of their release and their treatment before release, and the total quantity of SOx, NOx, hydrocarbons, and suspended particulates to be discharged annually</li> <li>– applicable Federal, State, and tribal regional standards concerning atmospheric emissions from consultation with Federal, State, regional, local, and affected Native American tribal agencies</li> <li>– information concerning nonradioactive wastes not considered in ESRPs 3.6.1 and 3.6.2. Examples include laboratory wastes, storm drainage, trash, hazardous wastes, and debris from bars or screens on the cooling water intake. The description should include estimates of the quantities of wastes, their pollutant concentrations at points of release as appropriate to the system, and other relevant data</li> </ul>	Yes	No	Yes	No discussion of applicable Federal, State, and tribal regional standards concerning atmospheric emissions in Section 3.6.3 or referenced sections.  Notes: In Section 3.6.3.3, concerning non-radioactive wastes not considered in ESRPs 3.6.1 and 3.6.2 – no estimates of quantities by the applicant.  For this applicant, the listing of procedures appears to mean a commitment to use off-site licensed/permitted facilities.					



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		2.	3.	4.	5.	7.	8.	9.	10.	11.
	<ul style="list-style-type: none"> <li>- procedures for any offsite disposal of wastes</li> <li>- procedures by which all effluents will be treated, controlled, and discharged to meet State and EPA effluent limitation guidelines and new source performance standards</li> </ul>									
3.7	Basic electrical design parameters, including transmission design voltage or voltages, line capacity, conductor type and configuration, spacing between phases, minimum conductor clearances to ground, maximum predicted electric-field strength(s) at 1 m above ground, the predicted electric field strength(s) at the edge of the corridor in kilovolts per meter (kV/m), and the design bases for these values.	NA	NA	NA						
3.7	Predicted noise levels resulting from transmission-system operation.	NA	NA	NA						
3.7	Basic structural design parameters, including illustrations and descriptions of towers, conductors, and other structures, with dimensions, materials, color, and finish.	NA	NA	NA						
3.7	The applicant should provide siting data for all potential corridors identified by the applicant utilizing topographic maps (7.5- or 15-minute scale as a rule) or aerial photographs showing the proposed corridor or corridors and all existing major high voltage corridors in the region.	NA	NA	NA						
3.7	Lengths, widths, and area of corridors, including modification and/or use of existing corridors and other facilities for the proposed project.	NA	NA	NA						
3.7	General methods of construction (e.g., tower foundations, stringing, location of access roads, span length, and clearing of corridors).	NA	NA	NA						
3.7	When available, tower and substation locations.	NA	NA	NA						
3.7	Basic electrical design parameters, including transmission design voltage or voltages, line capacity, conductor type and configuration, spacing between phases, minimum conductor clearances to ground, maximum predicted electric-field strength(s) at 1 m above ground, the predicted electric field strength(s) at the edge of the corridor in kilovolts per meter (kV/m), and the design bases for these values.	Yes	Yes	NA						

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
3.7	Predicted noise levels resulting from transmission-system operation.	Yes	Yes	NA						
3.7	Basic structural design parameters, including illustrations and descriptions of towers, conductors, and other structures, with dimensions, materials, color, and finish.	Yes	Yes	NA						
3.7	The applicant should provide siting data for all potential corridors identified by the applicant using topographic maps (7.5- or 15-minute scale as a rule) or aerial photographs showing the proposed corridor or corridors and all existing major high voltage corridors in the region.	Yes	Yes	NA						
3.7	Lengths, widths, and area of corridors, including modification and/or use of existing corridors and other facilities for the proposed project.	Yes	Yes	NA						
3.7	General methods of construction (e.g., tower foundations, stringing, location of access roads, span length, and clearing of corridors).	Yes	Yes	NA						
3.7	When available, tower and substation locations.	Yes	Yes	Yes	The figure that supposedly provides detail on this topic (Figure 3.7-1) has been exempted from disclosure by statute (10 CFR 2.390(a) (3)). It seems strange that this information is withheld on an existing corridor.					
3.7	Basic electrical design parameters, including transmission design voltage or voltages, line capacity, conductor type and configuration, spacing between phases, minimum conductor clearances to ground, maximum predicted electric-field strength(s) at 1 m above ground, the predicted electric field strength(s) at the edge of the corridor in kilovolts per meter (kV/m), and the design bases for these values.	Yes	Yes/ NA	NA	To the extent that these topic areas have traditionally been covered in EISs (focusing primarily on voltage), the ER is sufficient.					
3.7	Predicted noise levels resulting from transmission-system operation.	Yes	Yes	NA						

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
3.7	Basic structural design parameters, including illustrations and descriptions of towers, conductors, and other structures, with dimensions, materials, color, and finish.	Yes	Yes	NA						
3.7	The applicant should provide siting data for all potential corridors identified by the applicant utilizing topographic maps (7.5- or 15-minute scale as a rule) or aerial photographs showing the proposed corridor or corridors and all existing major high voltage corridors in the region.	Yes	Yes	NA						
3.7	Lengths, widths, and area of corridors, including modification and/or use of existing corridors and other facilities for the proposed project.	Yes	Yes	NA						
3.7	General methods of construction (e.g., tower foundations, stringing, location of access roads, span length, and clearing of corridors).	Yes	Yes	NA						
3.7	When available, tower and substation locations.	Yes	Yes	Yes	The figure that supposedly provides detail on this topic (Figure 3.7-1) has been exempted from disclosure by statute (10 CFR 2.390(a)(3)). It seems strange that this information is withheld on an existing corridor.					
3.8	Does the applicant compare the proposed reactor's core thermal power level to the condition specified in 10 CFR 51.52(a)(1) (i.e., 3,800 MW(t))?	Yes (Sec 3.8.2.1)	Yes	NA	NA					
3.8	Does the applicant compare the fuel form and enrichment levels to the conditions specified in 10 CFR 51.52(a)(2) (i.e., the reactor fuel is in the form of sintered uranium dioxide pellets having a uranium-235 enrichment not exceeding 4% by weight and the pellets are encapsulated in zircalloy rods)?	Yes (Sec 3.8.2.2, 3.8.2.3, 3.8.2.4)	Yes	NA	NA					
3.8	Does the applicant compare the average irradiation level of the fuel to the conditions specified in 10 CFR 51.52(a)(3) (i.e., average level of irradiation of the irradiated fuel from the	Yes (Sec 3.8.2.3, 3.8.3.5)	Yes	NA	NA					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
	reactor does not exceed 33,000 megawatt per metric ton and no irradiated fuel assembly is shipped until at least 90 days after it is discharged from the reactor)?									
3.8	Does the applicant state that, with the exception of irradiated fuel, all radioactive waste shipped from the reactor is packaged and in solid form (10 CFR 51.52(a)(4))?	Yes (Sec 3.8.3)	Yes	NA	NA					
3.8	Does the applicant state that the unirradiated fuel is shipped to the reactor by truck; irradiated fuel is shipped from the reactor by truck, rail, or barge; and radioactive waste other than irradiated fuel is shipped from the reactor by truck or rail (10 CFR 51.52(a)(5))?	Yes (Sec 3.8.1, 3.8.2.6, 3.8.3)	Yes	NA	NA					
3.8	If the proposed reactor and fuel designs and operations do not meet all the conditions in 10 CFR 51.52(a)(1) through (a)(5), does the applicant provide an analysis of the environmental impacts of transportation of fuel and waste to and from the reactor with respect to normal conditions of transport and possible accidents (10 CFR 51.51(a)(6))?	No	No	Yes	The analysis in Sec 3.8 incorrectly assumes NRC has approved higher enrichments and burnup levels for advanced reactors and cites NUREG-1437 and NUREG-1555 as basis.					
3.8	Does the applicant estimate the heat load in a spent fuel shipping cask and compare the result to 10 CFR 51.52 Table S-4 conditions (i.e., 225,000 Btu/hr (~66 kW)?	No	No	Yes	Quantitative information on SNF shipment heat load is not provided in Sections 5.11 or 7.4 of the ER					
3.8	Does the applicant evaluate the weights of shipments of fuel and waste and compare that to the shipment weights in 10 CFR 51.52, Table S-4 (i.e., governed by Federal or State restrictions; 73,000 lbs per truck, 100 tons per cask per rail car)?	Yes (Sec 7.4.1, 7.4.4, and 7.4.3)	Yes	NA	NA					
3.8	Does the applicant estimate traffic density for fuel and waste shipments and compare the result to the Table S-4 condition (i.e., one truck shipment per day or three rail shipments per month)?	Yes (Sec 7.4.1, 7.4.4, and 7.4.3)	Yes	NA	NA					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
3.8	Does the applicant estimate the radiation dose to transport workers and compare the result to the Table S-4 condition (i.e., individual radiation doses in the range from 0.01 to 300 millirem per reactor year, population doses are 4 person-rem per reactor year)?	No	No	Yes	A full and detailed analysis of transportation impacts is not provided as required by 10 CFR 51.52(b)					
3.8	Does the applicant calculate routine radiation doses to the general public - onlookers and compare the results to the Table S-4 conditions (i.e., routine radiation doses to onlookers – individual radiation doses in the range 0.003 to 1.3 millirem per reactor-year and population doses 3 person-rem per reactor year)?	No	No	Yes	A full and detailed analysis of transportation impacts is not provided as required by 10 CFR 51.52(b)					
3.8	Does the applicant calculate routine radiation doses to the general public along the route and compare the results to Table S-4 conditions (i.e., individual radiation doses in the range 0.0001 to 0.06 millirem per reactor year and population doses 3 person-rem per reactor year (includes doses to onlookers).	No	No	Yes	A full and detailed analysis of transportation impacts is not provided as required by 10 CFR 51.52(b)					
3.8	Does the applicant demonstrate that the radiological effects of accidents are SMALL as stated in Table S-4?	No	No	Yes	A full and detailed analysis of transportation impacts is not provided as required by 10 CFR 51.52(b)					
3.8	Does the applicant estimate the non-radiological impacts of accidents and compare the results to Table S-4 condition (i.e., non-radiological accidents result in one fatal injury per 100 reactor years, 1 non-fatal injury in 10 reactor years, and \$475 in property damage per year)?	No	No	Yes	A full and detailed analysis of transportation impacts is not provided as required by 10 CFR 51.52(b)					
4.1.1	Has the applicant addressed transportation of construction materials to the site? For example, will rail service need to be established, restored, or otherwise reconditioned to accommodate the industrial loads expected during facility construction? If so, have these activities been characterized?	NA	NA	NA						
4.1.1	Will the applicant be making use of currently abandoned rail lines?	NA	NA	NA						

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
4.1.1	Will dredging of barge slips or other channels be required to facilitate construction? If so, where will the dredge spoils be deposited and what volume of spoil is projected?	NA	NA	NA						
4.1.1	Will borrow pits be constructed (or expanded)? If so what volumes of borrow will be transported and used in construction?	NA	NA	NA						
4.1.1	Has the applicant detailed the extent of the planned construction footprint in terms of amount of disturbed ground?	NA	NA	NA						
4.1.1	Will local roads or highways need reconditioning to handle the expected loads?	NA	NA	NA						
4.1.1	To what degree is the construction labor force expected to locate in the vicinity of the proposed facility? Will there be temporary housing communities during construction?	NA	NA	NA						
4.1.1	Is the applicant seeking a Limited Work Authorization (LWA) as part of an ESP application? If so, the LWA authorizes a significant amount of ground-disturbing activities at the site to prepare for eventual reactor building construction. These activities should be clearly identified in the application as part of the Site Redress Plan, and the applicant should demonstrate that cooperation with relevant permitting agencies is underway or expected.	NA	NA	NA						
4.1.1	Has the applicant addressed transportation of construction materials to the site? For example, will rail service need to be established, restored, or otherwise reconditioned to accommodate the industrial loads expected during facility construction? If so, have these activities been characterized?	Yes	Yes	NA	Also included in Section 4.4.1.3					
4.1.1	Will the applicant be making use of currently abandoned rail lines?	Yes	Yes	NA						
4.1.1	Will dredging of barge slips or other channels be required to facilitate construction? If so, where will the dredge spoils be deposited and what volume of spoil is projected?	Yes	Yes	NA	Degree of dredging and spoils and specific locations not yet determined.					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
4.1.1	Will borrow pits be constructed (or expanded)? If so what volumes of borrow will be transported and used in construction?	Yes	Yes	NA	Specific locations not yet determined.					
4.1.1	Has the applicant detailed the extent of the planned construction footprint in terms of amount of disturbed ground?	Yes	Yes	NA						
4.1.1	Will local roads or highways need reconditioning to handle the expected loads?	Yes	No	Yes	4.4.1.3 expects roads adequate to handle construction activities, but 4.1.1.1 indicates that the construction of new roads, both temporary and permanent, are planned, but provides no additional detail.					
4.1.1	To what degree is the construction labor force expected to locate in the vicinity of the proposed facility? Will there be temporary housing communities during construction?	Yes	Yes	Yes	Section 4.4.2.4 indicates that applicant will re-evaluate housing situation during construction.					
4.1.1	Is the applicant seeking a Limited Work Authorization (LWA) as part of an ESP application? If so, the LWA authorizes a significant amount of ground-disturbing activities at the site to prepare for eventual reactor building construction. These activities should be clearly identified in the application as part of the Site Redress Plan, and the applicant should demonstrate that cooperation with relevant permitting agencies is underway or expected.	NA	NA	NA	No Limited Work Authorization or Site Redress Plan in place at this time.					
4.1.2	Highways, railroads, and utility corridors that will be crossed by transmission lines and access corridors	NA	NA	NA						
4.1.2	Description of construction techniques and the associated impact on land use.	NA	NA	NA						
4.1.2	Area and location of land within the corridors and offsite areas that will be disturbed by construction on either a long-term or short-term basis.	NA	NA	NA						

1. Issue Area/Topic (ESRP, Reg or RG Section)	Sufficiency Review Question  Is the following material found and cited in the Environmental Report, Site Safety Analysis Report, or Site Redress Plan?	Completeness and Technical Sufficiency Which Form Basis for Acceptability for Docketing				Changes to Planning Assumptions to be Considered in Development of Baseline Review Schedule			Review Dependencies Among Concurrent Reviews	
		2.	3.	4.	5.	7.	8.	9.	10.	11.
4.1.2	Planned control actions during construction that will restrict land use in the corridors and offsite areas.	NA	NA	NA						
4.1.2	Do proposed corridors cross land zoned for residential or recreational uses?	NA	NA	NA						
4.1.2	Has the applicant addressed the visual impact of constructing new corridors or widening existing corridors?	NA	NA	NA						
4.1.2	Highways, railroads, and utility corridors that will be crossed by transmission lines and access corridors	NA	NA	Yes	These issues (4.1.2) are largely not applicable, as the applicant plans to use existing transmission lines and corridors; however, additional overall descriptive information on corridor will be needed.					
4.1.2	Description of construction techniques and the associated impact on land use.	NA	NA	Yes	These issues (4.1.2) are largely not applicable, as the applicant plans to use existing transmission lines and corridors; however, additional overall descriptive information on corridor will be needed.					
4.1.2	Area and location of land within the corridors and offsite areas that will be disturbed by construction on either a long-term or short-term basis	NA	NA	Yes	These issues (4.1.2) are largely not applicable, as the applicant plans to use existing transmission lines and corridors; however, additional overall descriptive information on corridor will be needed.					



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		2.	3.	4.	5.	7.	8.	9.	10.	11.
4.1.2	Planned control actions during construction that will restrict land use in the corridors and offsite areas.	NA	NA	Yes	These issues (4.1.2) are largely not applicable, as the applicant plans to use existing transmission lines and corridors; however, additional overall descriptive information on corridor will be needed..					
4.1.2	Do proposed corridors cross land zoned for residential or recreational uses?	NA	NA	Yes	These issues (4.1.2) are largely not applicable, as the applicant plans to use existing transmission lines and corridors; however, additional overall descriptive information on corridor will be needed.					
4.1.2	Has the applicant addressed the visual impact of constructing new corridors or widening existing corridors?	NA	NA	Yes	These issues (4.1.2) are largely not applicable, as the applicant plans to use existing transmission lines and corridors; however, additional overall descriptive information on corridor will be needed..					
4.1.3	A description and National Register evaluation of cultural resources within the site boundary.	Yes	Yes	NA						
4.1.3	A description and National Register evaluation of cultural resources within 15 km (9 mi) of the proposed site or 2 km (1.2 mi) of proposed transmission corridors, access corridors, and offsite areas.	Yes	No	Yes	It is unclear if the description of historic properties include those located within the transmission line corridors or if they are limited to the BLN site. It is also	It is possible, if cultural resource surveys have not been completed for				

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		2.	3.	4.	5.	7.	8.	9.	10.	11.	
					unclear if cultural resource surveys have been conducted of the transmission lines and if any historic properties were located within the transmission line corridors. Access to APE map may clarify this further as well as a clarification of TVA's Sensitive Area Review procedure discussed in 2.5.3 may address this issue. One of the five archaeological sites (1JA111) located on the BLN site has not been formally evaluated but is described as "potentially eligible". A formal evaluation has not been completed and would be necessary if the site cannot be avoided. (2.5.3 and 4.1.3 and 5.1.3.2)	the transmission line corridors then these would need to be completed to address operation impacts. Sensitive Area Review process may address this.					
4.1.3	The State Historic Preservation Officer's (SHPO's) comments on the impact of the proposed project on important historic properties (from consultation with State agencies and Native American tribal agencies).	Yes	No	Yes	Additional correspondence beyond initial correspondence between SHPO and the archaeological contractor and NuStart and SHPO and TVA was referenced but not included (2.5.3, 4.1.3 and 5.1.3).						

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
4.1.3	State laws and plans for historic preservation.	Yes	Yes	NA						
4.1.3	The applicant's procedures for identifying the potential for human remains to occur in the project and for complying with provisions of the Native American Graves Protection and Repatriation Act in the event of an inadvertent discovery.	Yes	No	Yes	ER indicates that TVA intends to develop a plan of action to address NAGPRA and an MOA to address conditions of construction monitoring. Proposed contents of the subject plan of action and MOA were not included (4.1.3.3).					
4.1.3	The applicant's finding on whether important cultural and historical resources will be affected. During construction.	Yes	No	NA	A cultural and historical overview is not included. A general/brief description of the cultural and historical context for the region would be helpful for understanding significance of resources being affected. It is also unclear if cumulative and/or secondary impacts resulting from modifications to the docking facilities and discharge structure and potential off-site activities associated with the need for borrow material described in Sections 4.1, 4.2 and 4.3 have been adequately addressed in the ER (4.1.3 and 5.1.3).		Cultural and historical overview descriptions are likely readily available in the referenced cultural resources survey reports.			

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
4.1.3	The applicant's finding on whether important cultural and historical resources will be adversely affected.	Yes	No	Yes	No details for cultural resources located within the transmission line corridors were provided or indication of monitoring, or avoidance measures that may be implemented to avoid such resources, if any. It is also unclear if cumulative and/or secondary impacts resulting from modifications to the docking facilities and discharge structure and potential off-site activities associated with the need for borrow material described in Section 4.1, 4.2, and 4.3 have been adequately addressed in the ER (4.1.3 and 5.1.3).					
4.1.3	The applicant's proposed avoidance measures to avoid impact to important cultural and historical resources during construction.	Yes	No	Yes	ER indicates that TVA intends to develop a plan of action to address NAGPRA and an MOA to address conditions of construction monitoring. Proposed contents of the subject plan of action and MOA were not included (4.1.3.3).					

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4.1.3	A description and National Register evaluation of cultural resources within 15 km (9 mi) of the proposed site or 2 km (1.2 mi) of proposed transmission corridors, access corridors, and offsite areas.	Yes	Yes, but not in 4.1.3 – covered in 3.7	Yes	Refers to field surveys conducted during original ER and approval with State of AL Historical Commission. Additionally, they indicate that a “Sensitive Area Review” will be conducted before lines are re-energized (need follow-up on what is involved with Sensitive Area Review).					
4.2.1	The following list of data should be obtained: – descriptions of the physical characteristics of the surface-water bodies and groundwater aquifers – identification and description of project related construction activities expected to result in hydrologic alterations at the site, transmission corridors, and offsite areas. Activities include construction of cofferdams and storm sewers; dredging operations; placement of fill material into the water; creation of shoreside facilities involving bulkheads, piers, jetties, basins, or other structures or activities with potential to alter existing shoreline processes; construction of intake and outfall structures; water channel modifications; construction of roads and bridges; operations affecting water levels (flooding); dewatering activities; and construction activities contributing to sediment runoff, e.g., road construction, clearing and grading, fill or spoil placement	Yes	No	Yes	There is a potential for dewatering during excavation and construction in areas where excavations will reach ~10 ft below the water table. However, potential dewatering efforts are not described or quantified in any detail.				Yes	
4.2.1	The following list of data should be provided: – identification of water sources used during construction and the average and maximum use rates of these waters – identification of water bodies receiving	Yes	Yes	NA	Note: Will rely on statements that BMP will be applied – and descriptions of those					

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	<p>construction effluents and the expected average and maximum flow rates and physical characteristics (temperature, sediment load, velocities) of these effluents</p> <ul style="list-style-type: none"> <li>- identification of hydrologic alterations expected to result from the project related construction activities listed previously</li> <li>- identification and location of groundwater and surface-water users and areas that could be affected by project related hydrologic alterations</li> <li>- descriptions of proposed practices and measures to limit or minimize expected hydrologic alterations</li> <li>- Federal, State, regional, local, and affected Native American tribal agencies' best management practices and regulations</li> <li>- descriptions of proposed means to ensure construction activity compliance with applicable hydrological standards and regulations.</li> </ul>				practices that appear in the ER.					
4.2.2	<p>The following data should be provided:</p> <ul style="list-style-type: none"> <li>- identification and locations of groundwater and surface-water users and areas that could be impacted by project related construction activities affecting water use</li> <li>- predicted impacts on the water users identified in the previous item</li> <li>- descriptions of any proposed practices and measures to control construction related water use impacts. Factors to be considered include flooding, drainage, groundwater elevation, erosion, sedimentation, water quality, protection of natural drainage channels and water bodies, protection of shorelines and beaches, restrictions on access to and use of surface water, protection against saltwater intrusion, and handling of fuels, lubricants, oily wastes, chemical wastes, sanitary wastes, herbicides, and pesticides</li> <li>- consultations with Federal, State, regional,</li> </ul>	Yes	Yes	NA	<p>Note: Figure 2.3-25 showing groundwater user location is omitted per 10 CFR 2.390(a)(9). Will need to see at audit.</p> <p>Table 2.3-31 showing local surface water users omits distance and location information per 10 CFR 2.390(a)(3). Will need to see at audit.</p> <p>Quantification of potential impacts is not presented. The applicant states that normal construction</p>					

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	<p>local, and affected Native American tribal regulators</p> <ul style="list-style-type: none"> <li>- descriptions of proposed means to ensure construction activity compliance with water-quality and water-use standards and regulations</li> <li>- water-quality requirements for key elements of aquatic ecosystem and domestic users</li> </ul>				water use will not lead to runoff, and that precipitation (the additional water) could result in runoff during construction. However, it is not possible to quantify temp, water velocity...that could occur.					
4.2.2	<p>The following list of data should be provided:</p> <ul style="list-style-type: none"> <li>- descriptions of the site and vicinity water bodies and aquifers (including sole-source aquifers)</li> <li>- descriptions of hydrologic alterations and their related construction activities</li> <li>- the physical effects of hydrologic alterations</li> <li>- comparisons of water quantity available to other water users with existing and known future water rights and allocations</li> <li>- identification of water bodies receiving construction effluents (e.g., sanitary wastes, cleaning wastes, dust control, fuels and lubricants, chemical, herbicides, pesticides) and the expected average and maximum flow rates and composition of these effluents</li> <li>- baseline water-quality data for surface-water and groundwater sources used during construction and impacted by construction activities</li> <li>- potential changes to surface-water and groundwater quality (e.g., heavy metal contamination) resulting from substrate exposure during construction</li> </ul>	Yes	Yes	NA	Note: The applicant relies on the future use of BMPs rather than a detailed knowledge of water quality (e.g., throughout Towne Creek) or projections of potential changes.					
4.3.1	Has the applicant determined the areal extent and location of potential impacts, including the total area of land to be disturbed? Did the applicant provide a site map showing proposed buildings, the land to be cleared, borrow areas, waste disposal areas, the construction zone, and the site	Yes	No	Yes	Are there buildings scheduled for demolition? Where specifically will borrow areas and dredge spoils be					

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	boundary and the vegetation communities/ habitats that will be impacted?				located? Black-and- white figure format does not provide adequate detail.					
4.3.1	Does the applicant have a proposed schedule of construction activities and does the applicant plan to complete any of these construction activities under a limited work permit or as part of pre-construction? If so, which ones?	Yes	Yes	NA						
4.3.1	Does the applicant have a site redress plan?	Yes	Yes	NA						
4.3.1	Did the applicant describe the clearing methods; temporary and permanent erosion, runoff, and siltation control methods; dust suppression methods; and other construction practices for control or suppression specific to the site and to the transmission line corridors? Are best management practices being considered in the planning to mitigate construction activities?	Yes	Yes	NA						
4.3.1	Did the applicant provide an estimate of the potential for bird collisions with cooling towers, other elevated construction equipment or facility structures or with transmission towers or lines?	Yes	Yes	NA						
4.3.1	Did the applicant identify the construction activities that impact “important” species and habitats of the site and vicinity, transmission corridors, and offsite areas (e.g., construction activities that will dewater any wetlands, ponds, or seepages or alter surface drainage patterns supporting terrestrial biota/wetlands)?	Yes	No	Yes	Potential grade and fill impacts to surface water flow outside the construction zone not addressed. Will special species habitat be impacted outside construction area?					
4.3.1	Has the applicant identified the area to be used on a short term basis during construction, and plans for restoration of this land?	Yes	No	Yes	Laydown areas not identified.					
4.3.1	Has the applicant identified any noise impacts on “important” species?	Yes	Yes	NA						
4.3.2	Has the applicant identified the construction activities that could impact “important” aquatic species and habitats of the site and vicinity, transmission corridors, and offsite areas? Is there a map available that shows the areal extent and location of the construction activities?	Yes	No	Yes	4.3.2.1 Preliminary surveys indicate existing intake channel may function appropriately without dredging. 4.2.1.2 and					



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					<p>4.2.1.4 state that dredging is either “anticipated” or “expected.” Maps of the area to be dredged were not located. In particular, Section 4.2.1.2 discusses maintenance dredging, installation of riprap to stabilize banks of the embayment and river shoreline. But details and maps are not provided.</p> <p>4.3.2.5 Construction of reservoir may involve pile driving, dredging, barge traffic, and other noise producing activities. No details provided as to what or where.</p>					
4.3.2	<p>Is there information available that can be used to determine how construction activities will impact “important” species and their habitats (e.g., those resulting from scouring and siltation, dredging and soil disposal, and interference with shoreline processes)? Is there information that can be used to estimate the magnitude and duration of such impacts? Consider potential disturbances of benthic areas by the following construction activities:</p> <ul style="list-style-type: none"> <li>- placement of intake and discharge structures</li> <li>- channel modifications for navigation or flow control</li> <li>- placement and removal of cofferdams</li> <li>- construction of bulkheads, piers, jetties, basins, and storm sewers</li> <li>- direct dredging, including the area that may</li> </ul>	Yes	No	Yes	<p>4.2.1.1 – states that there will be “Construction or modification of existing cooling water intake structure and discharge structure for water withdrawn from and discharged into the Guntersville Reservoir/Tennessee River.... Construction of new and/or potential modification of docking facilities for</p>					

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	<p>be affected by resulting siltation and turbidity</p> <ul style="list-style-type: none"> <li>- percent of the water body cross section that might be obstructed by construction activity at any time</li> <li>- time and duration of such obstruction</li> <li>- potential changes to water quality caused by exposure of substrate to contaminants during construction (e.g., dredging for intake channels, cofferdam construction).</li> </ul>				barges/vessels.” However, no maps of impacted areas or details on the construction or modification of these structures was found.					
4.3.2	Is there information available that can be used to assess the potential for reversibility of impacts following completion of construction? Are there plans for environmental improvement following construction?	Yes	No	Yes	Section 4.3.2.1 provides information related to dredging. No information provided relative to impacts from modifications to barge slip or discharge.					
4.3.2	Are there plans for limiting impacts during construction (e.g., the maintenance of siltation ponds or catchment basins)? Are recognized best management practices cited as means for limiting impacts?	Yes	No	Yes	4.3.2 and 4.2.2.1 Discussed – but no references provided.  Referenceable sources for this information are needed.					
4.3.2	Are there plans for mitigation of a predicted impact using appropriate measures, which could include alternative placement of structures, alternative schedules, or alternative construction practices? Have any activities been evaluated that will result in adverse impacts that cannot be mitigated? Alternatives to mitigate adverse impacts could include using a fish hatchery or habitat restoration to increase natural fish production.	NA								
4.3.2	If dredging is involved, are there plans for disposal of dredged material and placement of fill material?	Yes	No	Yes	4.2.1.4 states they plan to place dredged material above the 500 yr flood elevation. Details on location not provided.					

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4.3.2	Are there plans for dewatering wetlands?	Yes	Yes	NA						
4.3.2	If a cooling pond is at the site or being considered in future construction, is there information about the aquatic species expected to become established in the cooling ponds?	NA								
4.3.2	If the applicant wishes to accelerate the start of construction, than evaluate that the applicant has included in the ER an initial evaluation of environmental impacts based on an analysis of at least six months of field data related to the proposed facility and suitable projections of the remaining seasonal periods if information has already been provided on the critical life stages and biologically significant activities (e.g., spawning, migration) that increase the vulnerability of the potentially affected biota at the proposed site.	NA								
4.4.1	Distribution of people, buildings, roads, and recreational facilities vulnerable to impact from construction-related activities.	Yes	No	Yes	Need clarification of methodology. Areas forecast for impact need to be described in more detail (e.g., characteristics of the population in Creeks Edge)					
4.4.1	Applicable standards for levels of noise, dust, and gaseous pollutants.	Yes	Yes	NA	Some confusion about traffic-related impact analysis					
4.4.1	Predicted noise levels at sensitive areas identified in the first item listed above.	Yes	Yes	NA						
4.4.1	Predicted air pollutant levels at sensitive areas identified in the first item listed above.	Yes	No	Yes	4.4.1.6 does not address air quality impacts from traffic					
4.4.2	Annual expenditures within the region for materials and services during construction.	Yes	No	Yes	Section 4.4.2.2 –need information about annual expenditures				No	Chapter 8, cost benefit, and Chapter 9, comparison of alternatives
4.4.2	Plans to supplement public facilities and services to support construction and agencies responsible for facility expansion.	Yes	No	Yes	Sections 4.4.1.3 and 4.4.2.3-5 discussed in very general way. Need discussion of				No	Chapter 8, cost benefit, and Chapter 9, comparison of

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					increased need for road repair as a consequence of increased traffic, for example. A referenceable source for this information is needed.					alternatives
4.4.2	Taxes by type and jurisdiction to be paid during construction.	Yes	No	Yes	4.4.2.2.1 No real data or analysis is provided. Sec- tion 4.4.2.2.1 is vague and does not include the level of analysis presented in Section 10.4.1.1.1. Need estimates of taxes, and the expected revenues including their relationship to expected needed expenditures for infrastructure for Section 4.4.2.2.1.				No	Chapter 8, cost benefit, and Chapter 9, comparison of alternatives
4.4.2	Annual construction labor force requirements (for each quarter year, if possible) over the construction period. Where necessary, requirements by major construction craft may be reported.	No	No	Maybe	Section 4.4.2.1 – Need more specific estimate of peak construction workforce, and information about distribution over time, and specifics of workforce characteristics.	Maybe			No	Chapter 8, cost benefit, and Chapter 9, comparison of alternatives
4.4.3	Pathways where any environmental (including socioeconomic) impact during construction may interact with cultural or economic facts that may result in disproportionate environmental impacts on minority and low-income populations.	Yes	No	Yes	In Sections 4.4.3.1 and 4.4.3.2 – need methodology and rationale. Provide indication that analysis is based on community-specific information.					

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					Assumptions that there are no particular pathways or vulnerabilities relevant to the minority populations in the area, is not supported and therefore limiting consideration to whether the overall impacts would be enough to affect the minority population (as they would affect anyone else) is inadequate. NRC feels that EJ will be an area that is scrutinized very carefully. This ER did this in an entirely pro-forma way, just running the numbers without investigating on the ground, so we need to be cautious.					
4.4.3	Any assessment (qualitative or quantitative, as appropriate) of the degree to which each minority or low-income population would disproportionately experience adverse human health or environmental (including socioeconomic) impacts during construction as compared with the entire geographic area. In addition, information should be obtained on any assessment comparing the impacts with the larger overall geographic area encompassing all of the alternative sites.	Yes	No	Yes	Need detailed explanation of method or indication that this was done in Section 4.4.3. A referenceable source for this information is needed.					
4.4.3	Any assessment (qualitative or quantitative, as appropriate) of the significance or potential significance of such environmental impacts on each minority and low-income population.	Yes	No	Yes	Need detailed explanation of method or indication that this was done in Section 4.4.3. A					

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					referenceable source for this information is needed.					
4.4.3	Any assessment of the degree to which each minority and low-income population would disproportionately receive any benefits compared with the entire geographic area.	Yes	No	Yes	This was addressed only indirectly, with no explicit analysis. Need detailed explanation of method with analysis for Section 4.4.3. A referenceable source for this information is needed.					
4.5	The physical layout of the site, including the location and orientation of onsite or adjacent nuclear fuel cycle facilities that are expected to be operating during construction of the proposed facility.	Yes	Yes	NA						
4.5	The location and characteristics of external radiation sources and radioactive effluent emission sources at nearby facilities.	Yes	Yes	NA						
4.5	Measured or estimated radiation dose rates and airborne radioactivity concentrations at the construction site.	Yes	Yes	NA						
4.5	The number and locations of construction workers who will be exposed to the radiation sources at the site and the amount of time per year that they will spend at those locations.	Yes	Yes	NA						
4.5	The estimated annual collective dose to the construction work force, including models assumptions, and input data used for the dose estimates.	Yes	Yes	NA						
4.6	Data and information related to the applicant's commitments to measures and controls to limit potential impacts should consist of the following three elements: (1) identification of the impact, (2) the planned control program, including monitoring, and (3) the control procedures – for the following areas: - noise - erosion	Yes	No	Yes	Need more specific information on what is planned to limit impacts – i.e., what specific BMPs are to be used.					

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	<ul style="list-style-type: none"> <li>- dust</li> <li>- traffic</li> <li>- effluents and wastes</li> <li>- surface-water impacts</li> <li>- groundwater impacts</li> <li>- land-use protection/restoration</li> <li>- water-use protection/restoration</li> <li>- terrestrial ecosystem impacts</li> <li>- aquatic ecosystem impacts</li> <li>- socioeconomic impacts</li> <li>- radiation exposure to construction workers</li> <li>- other site-specific impacts.</li> </ul>									
5.1.1	Depending on the site and the level of applicable demographic research, land use impacts could be projected to result from demand for new housing of operations workers. Only in rare cases would it be expected that enough research would be available to predict the degree that new housing would have land use impacts in the vicinity. The applicant should acknowledge the operations impact on housing and similar impacts that may occur from outage operations.	NA	NA	NA						
5.1.1	Potential agreement or conflict with local land use plans should be addressed by the applicant. The applicant needs to show how the operation of a new nuclear unit either compliments or conflicts with existing land use plans. Evidence of communication to this effect between the applicant and relevant agencies should be apparent.	NA	NA	NA						
5.1.1	The land use area also includes the impacts of salt drift from cooling tower steam plumes on crops and vegetation in the vicinity. The LR GEIS provides clear metrics for determining impact significance in this area, and it should be referenced in this context by the applicant preparing the ER.	NA	NA	NA						
5.1.1	Depending on the site and the level of applicable demographic research, land-use impacts could be projected to result from demand for new housing of operations workers. Only in rare cases would	Yes	Yes	NA	See Section 5.8.2.3.2.					

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	it be expected that enough research would be available to predict the degree that new housing would have land-use impacts in the vicinity. The applicant should acknowledge the operations impact on housing and similar impacts that may occur from outage operations.									
5.1.1	Potential agreement or conflict with local land-use plans should be addressed by the applicant. The applicant needs to show how the operation of a new nuclear unit either compliments or conflicts with existing land-use plans. Evidence of communication to this effect between the applicant and relevant agencies should be apparent.	Yes	Yes	Yes	Section 4.1.1.1 indicates they have looked at available regional land-use plans, but interactions appear limited. Some follow-up may be needed.					
5.1.1	The land-use area also includes the impacts of salt drift from cooling tower steam plumes on crops and vegetation in the vicinity. The LR GEIS provides clear metrics for determining impact significance in this area, and it should be referenced in this context by the applicant preparing the ER.	Yes	Yes	NA						
5.1.2	The applicant should provide a detailed characterization of typical transmission corridor maintenance activities.	NA	NA	NA						
5.1.2	Has the applicant addressed the question of impacts from seasonal access to transmission corridors that cross land in agricultural or other productive use?	NA	NA	NA						
5.1.2	The applicant should provide a detailed characterization of typical transmission corridor maintenance activities.	Yes	Yes	NA						
5.1.2	Has the applicant addressed the question of impacts from seasonal access to transmission corridors that cross land in agricultural or other productive use?	Yes	No	Yes	Seasonal access not explicitly addressed. To assess cumulative impacts, some additional descriptive information may be required (see Section 4.1.2). In addition, impacts of the activities required					



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					to re-energize the transmission lines (listed in Section 3.7) need to be addressed.					
5.1.3	A description and National Register evaluation of cultural resources within the site boundary.	Yes	Yes	Yes	NA					
5.1.3	A description and National Register evaluation of cultural resources within 15 km (9 mi) of the proposed site or 2 km (1.2 mi) of proposed transmission corridors, access corridors, and offsite areas.	Yes	No	Yes	No details for cultural resources located within the transmission line corridors were pro- vided or indication of monitoring, or avoid- ance measures that may be implemented to avoid such resources, if any. It is also unclear if cumulative and/or secondary impacts resulting from modifications to the docking facilities and discharge structure and potential off-site activities associated with the need for borrow material described in Sections 4.1, 4.2, and 4.3 have been adequately addressed in the ER (4.1.3 and 5.1.3).	It is possi- ble, if cultural resource surveys have not been com- pleted for the trans- mission line corri- dors then these would need to be com- pleted to address operation impacts. Sensitive Area Review process may address this.				
5.1.3	The SHPO's comments on the impact of the proposed project on important historic properties.	Yes	No	Yes	No details for cultural resources located within the transmission line corridors were included and no indication of SHPO comments on these resources. Reference					

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					to correspondence between SHPO and TVA is referenced, but not included (2.5.3, 3.7.2.1, 4.1.3, and 5.1.3)					
5.1.3	State laws and plans for historic preservation.	Yes	Yes	NA						
5.1.3	The applicant's finding on whether important cultural and historical resources will be affected during operations.	Yes	No	Yes	No details for cultural resources located within the transmission line corridors were pro- vided or indication of monitoring, or avoid- ance measures that may be implemented to avoid such resources, if any. Access to APE map may clarify this further as well as a clarification of TVA's Sensitive Area Review procedure discussed in 2.5.3 may address this issue. (4.1.3 and 5.1.3) It is also unclear if cumulative and/or secondary impacts resulting from modifications to the docking facilities and discharge struc- ture and potential off- site activities asso- ciated with the need for borrow material described in Sec- tions 4.1, 4.2 and 4.3 have been adequately addressed in the ER (2.5.3 4.1.3, 5.1.3)					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
5.2.1	<p>The following list of data should be provided:</p> <ul style="list-style-type: none"> <li>- a quantitative description of present and known future groundwater withdrawals on the site and for distances great enough to cover aquifers that may affect plant water availability or be affected by plant water use. The following should be included for each use : (a) location, depth, and elevation of wells (total and cased) and water levels with respect to the plant, (b) identification of aquifers, and (c) average monthly withdrawal rates.</li> <li>- operational activities expected to result in hydrologic alterations within the site and vicinity, along transmission corridors, or at offsite areas. These activities can include dredging operations, operations affecting water levels, and dewatering activities.</li> <li>- identification and description of the hydrological alterations resulting from the identified operational activities. These can include changes in the flood handling capability of the floodplain, flow and circulation patterns, erosion subsidence, water availability, and sediment transport</li> </ul>	Yes	Yes	NA	<p>Note: The map (Figure 2.3-25) showing the location of local groundwater wells is withheld by the applicant per 10 CFR 2.390(a)(9). May include private wells surveyed in 1961. Applicant claims there is no additional information available.</p> <p>No hydraulic head measurements shown for private wells.</p> <p>Impact conclusions likely based on groundwater hydraulic isolation, and no use of resource.</p> <p>Will review information at the audit.</p>					
5.2.1	<p>The following list of data should be provided:</p> <ul style="list-style-type: none"> <li>- descriptions of the physical characteristics of the surface-water bodies and groundwater aquifers</li> <li>- quantitative descriptions of proposed water sources, including groundwater sustained yield, 7-day once-in-10-years low flow, flows (including reverse and regulated) and yields during the drought of record, and low lake levels; estimates of frequency and duration of water-supply shortages</li> <li>- withdrawals and returns of surface water and groundwater used for plant operation, including rates and sources of water. This</li> </ul>	Yes	Yes	NA	<p>Note: The location of present and known surface water users is incomplete per 10 CFR 2.390(a)(3). Table 2.3-31 omits all distance and location information on water users.</p>					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
	<p>should include the different operational modes of the plant. The information should also include plant effluent quantity and physical characteristics as a function of the different operational modes.</p> <ul style="list-style-type: none"> <li>– a quantitative description of present and known future surface-water uses (diversions, consumptions, and returns) that are within the hydrological system in which the plant is located and that may affect plant water availability or be affected by plant water use. The following should be included for each use: (a) locations of diversions and returns with respect to the plant intake system (b) identification of water bodies, and (c) average monthly withdrawal and consumption rate.</li> </ul>									
5.2.1	<p>The following list of data should be provided:</p> <ul style="list-style-type: none"> <li>– identification and locations of surface-water and groundwater users (including aquatic ecosystems) and water-use areas that could be affected by hydrologic alterations resulting from plant operation</li> <li>– a summary of statutory and other legal restrictions relating to plant water use and water consumption</li> <li>– descriptions of proposed means to ensure compliance with standards and regulations affecting plant water use and water consumption, and proposed practices and measures to limit or minimize operational hydrologic alterations.</li> </ul>	Yes	Yes	NA	<p>Note: Figure 2.3-25 showing groundwater user location is omitted per 10 CFR 2.390(a)(9).</p> <p>Table 2.3-31 showing local surface water users omits distance and location info per 10 CFR 2.390(a)(3).</p> <p>Focus of text in Section 5.2.1.4 is on large-scale water use. Nothing mentioned explicitly about nearby residences on Towne Creek and their water use and potential impacts.</p>					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
5.2.2	<p>The following list of data should be provided:</p> <ul style="list-style-type: none"> <li>- descriptions of the site and vicinity water bodies and groundwater aquifers</li> <li>- descriptions of hydrologic alterations and their related operational activities</li> <li>- the physical effects of hydrologic alterations</li> <li>- a quantitative description of present and known future surface-water uses, including any station water</li> </ul> <p>Uses not associated with the proposed project that are within the hydrological system in which the plant is located and that may be adversely affected by the plant. The following should be included for each use: (a) identification of the water body, (b) locations of diversions and returns with respect to the plant. Diversions located between the plant discharge and the region of complete dilution should be further characterized by location with respect to the water body, (c) average monthly withdrawal and consumption rate for each division by use category (e.g., domestic, municipal, agriculture).</p>	Yes	Yes	NA	<p>Note: Diversions on the scale of local domestic users on Towne Creek not addressed.</p> <p>Figure 2.3-25 showing groundwater user location is omitted per 10 CFR 2.390(a)(9). Most recent information is from 1961 (tabulated in the SAR).</p> <p>Table 2.3-31 showing local surface water users omits distance and location info per 10 CFR 2.390(a)(3). This table does not address low volume domestic users adjacent to Towne Creek.</p>					
5.2.2	<p>The following list of data should be provided:</p> <ul style="list-style-type: none"> <li>- a quantitative description of present and known future groundwater withdrawals on the site and for distances great enough to cover aquifers that may be adversely affected by the plant</li> </ul> <p>The following should be included for each use: (a) withdrawal location, (b) depth and elevation of wells (total and cased depth) and water levels, (c) identification of aquifers, and (d) average monthly withdrawal rates by use category.</p> <ul style="list-style-type: none"> <li>- comparisons of water quantity available to other water users with existing and known future water rights and allocations</li> <li>- a quantitative and qualitative description of recreational, navigational, and other</li> </ul>	Yes	Yes	NA	<p>Note: Figure 2.3-25 showing groundwater user location is omitted per 10 CFR 2.390(a)(9). Most recent information is from 1961. Groundwater levels not known.</p> <p>Instream water use on Guntersville Reservoir is unknown or at least not quantified at this</p>					

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	<p>nonconsumptive known future water uses. For a 10-km (6-mi) radius, this should include the following: (a) identification of water bodies and location with respect to the plant, (b) kind and location of activity on the water body, and (c) use rate with time variation</p> <ul style="list-style-type: none"> <li>- identification of water bodies receiving plant effluents and the expected average and maximum flow rates and composition of these effluents</li> <li>- predicted impacts to water users or water-use categories described in the "Data and Information" section of this ESRP</li> <li>- baseline water-quality data for surface-water and groundwater sources used for and impacted by plant operation (from ESRP 2.3.3)</li> </ul>				<p>time. Kind, location, and use rate information not provided for non-consumptive users.</p> <p>Need to coordinate with aquatic ecology and socio-economics.</p>					
5.2.2	<p>The following list of data should be provided:</p> <ul style="list-style-type: none"> <li>- baseline water-quality data for surface-water and groundwater sources used for and impacted by plant operation</li> <li>- descriptions of any proposed practices and measures to control or limit operational water-use impacts</li> <li>- summary of statutory and other legal restrictions relating to water use or specific water-body restrictions on water use imposed by Federal, State, regional, local, or affected Native American tribal regulations</li> <li>- Federal, State, regional, local, and affected Native American tribal standards and regulations applicable to water quality and water use (from consultation with Federal, State, regional, local, and affected Native American tribal agencies)</li> <li>- descriptions of proposed means to ensure operational compliance with water-quality and water-use standards and regulations</li> </ul>	Yes	Yes	NA	<p>Note: Need to learn more about the frequency and magnitude of dredging activities in the vicinity of the facility intake and discharge structures, as well as proposed practices and measures to control or limit operational impacts.</p>					

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5.3.1.1	The following list of data should be provided: <ul style="list-style-type: none"> <li>- bathymetry and sediment characteristics in the vicinity of the intake structure(s)</li> <li>- maps depicting station layout with respect to the water body, including locations of all intakes and discharges</li> <li>- intake flow rates and velocities as a function of plant operating conditions</li> <li>- detailed drawings of the intake structure(s), including the relationship of the structure to the water surface (normal and minimum levels)</li> <li>- ambient current patterns in the vicinity of the proposed intake structure(s)</li> <li>- descriptions of other intake system design and performance characteristics affecting hydrodynamics (e.g., horizontal and vertical approach velocities, geometry of intake canals, submerged riprap)</li> <li>- descriptions of spatial and temporal alterations of the ambient flow field and of any other physical hydrologic effects induced by intake-system operation</li> </ul>	Yes	Yes	NA						
5.3.1.2	Has the applicant identified adverse impacts of cooling system intake operation to aquatic ecosystems?	Yes	Yes	NA						
5.3.1.2	Have measures or controls to limit adverse impacts been identified?	Yes	Yes	NA						
5.3.1.2	Has the applicant provided a current NPDES permit with a 316(b) determination, if appropriate, or equivalent State permits and supporting documentation?	Yes	No	Yes	5.2.2.2.1 Current NPDES permit will need to be revised for new facility					
5.3.1.2	Has the applicant identified the “important” aquatic organisms and their life stages susceptible to entrapment, impingement, or entrainment?	Yes	No	Yes	5.3.1.2.1 Important species were identified in part. Additional information and data needed related to abundance of pink mucket mussel and Anthony’s river snail. Information on					

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					recreationally important species and potential for entrapment, impingement and entrainment needed.					
5.3.1.2	Is there information available to estimate the levels of susceptibility for fish or shellfish species to be entrapped or impinged by the cooling system, in either qualitative or quantitative terms? Is there information about the design and proposed operation of any proposed systems (e.g., screen wash or fish return system) and how the potential for entrapment and impingement with that system?	Yes	No	Yes	5.3.1.2.1 Species composition data is needed to verify statement that sampling near intake and discharge is not warranted. Details on Widows Creek Fossil Plant cooling system (design, water flow rate, etc.) are needed.					
5.3.1.2	Is there information on the cooling system concerning the potential for altered hydrodynamic characteristics induced by inlet system operation (e.g., altered circulation patterns) to affect attraction and entrapment of aquatic biota? What is the extent and seasonal variation of any such alterations? Are there plans for recirculation of heated effluent from the facility discharge system, which has the potential for increased impacts of entrapment, entrainment, and impingement?	Yes	Yes	NA						
5.3.1.2	Has the applicant estimated the magnitude of the potential impingement and entrainment impacts on the species populations and the aquatic ecosystem?	Yes	No	Yes	5.3.1.2.1 Need more information for tie-in to Widows Creek Fossil Plant as a surrogate and more information on species					
5.3.2.1	The following list of data should be obtained on the RECEIVING SURFACE water bodies: – bathymetry of the water bodies that may be affected by operation of the plant discharge system, with detailed data in the vicinity of the discharge	Yes	Yes	NA						



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		2.	3.	4.	5.	7.	8.	9.	10.	11.
	<ul style="list-style-type: none"> <li>- maps depicting station layout with respect to water bodies, including the locations of all intakes and discharges</li> <li>- maximum, average maximum, average, average minimum, and minimum monthly temperatures in the water bodies</li> <li>- erosion characteristics and sediment transport (including rate, bed and suspended load fractions, and gradation analyses)</li> <li>- for freshwater streams: maximum, average maximum, average, average minimum, and minimum monthly flow rates; historical drought stages and flow rates by month, 7-day once-in-10-years low flow; important short duration fluctuations (e.g., diurnal release variations from peaking operation of upstream hydroelectric plant, diurnal temperature variations); velocity and temperature distributions (horizontal and vertical) near the discharge structure and downstream to the area of total mixing</li> </ul>									
5.3.2.1	<p>The following list of data should be obtained on the RECEIVING SURFACE water bodies:</p> <ul style="list-style-type: none"> <li>- for lakes and impoundments: description of the lake or impoundment geometry; location and elevation of impoundment outlets; elevation area capacity curves; summary description of operating rules; maximum, average maximum, average, average minimum, and minimum monthly inflow and outflow rates; temperature distributions (horizontal and vertical); and seasonal variations of density induced currents</li> <li>- for estuaries and oceans: seasonal variations in the shoreline and bottom geometry due to sediment transport; tidal current patterns (velocities and phases), range, and excursion; nontidal circulation patterns including frequency distributions of current speed, direction, and persistence; and temperature and salinity distribution (horizontal and vertical) including temporal variations. For estuaries, maximum,</li> </ul>	Yes	Yes	NA						

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
	average maximum, average, average minimum, and minimum monthly river discharge and flushing characteristics									
5.3.2.1	The following list of data should be obtained on the METEOROLOGY: <ul style="list-style-type: none"> <li>- onsite meteorological data</li> <li>- National Oceanographic and Atmospheric Administration (NOAA) National Climatic Data Center meteorological data for the nearest National Weather Service (NWS) station</li> <li>- the elevation of instruments measuring wind speeds, wet bulb temperatures, and humidities</li> </ul>	Yes	Yes	NA						
5.3.2.1	The following list of data should be obtained on the DISCHARGE STRUCTURE: <ul style="list-style-type: none"> <li>- detailed drawings of the discharge structure(s), including relationship of structure(s) to the water surface (normal and minimum) and water body bathymetry</li> <li>- water flow rates, velocities, and temperatures in the discharge stream(s) as a function of operating conditions</li> </ul>	Yes	Yes	NA	Note: Could use more complete drawings of the discharge structure. The cross section drawing, Figure 3.4-3, appears truncated – not showing the diffusers in the river, and the plan view drawing, Figure 5.3-2, does not show the relationship between the structure and the river setting (i.e., orientation and distance from shore, elevation in stream, proximity to shoals, islands, both shores).					
5.3.2.1	The following list of information on the applicant's models, if used: <ul style="list-style-type: none"> <li>- for numerical models: (a) theory, assumptions, and basis for applicability, (b) procedures used to estimate model parameters (e.g., diffusion coefficients), (c) model verification, and (d) the</li> </ul>	Yes	Yes	NA	Notes: Will request the calculation package for CORMIX runs from the applicant at the site audit. Will ask the applicant to					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
	<p>applicant's predicted temperature distributions, areas for isotherms, dilution rates, and time of passage through plume.</p> <ul style="list-style-type: none"> <li>For physical models: (a) physical model facilities (e.g., dimensions of the plume and flow rates), (b) modeling techniques and scaling relationships, (c) data collection and analysis techniques (e.g., number and locations of temperature probes, infrared mapping), (d) prototype verification (if any), and (e) the applicant's flow fields and temperature distributions for critical and average hydrological conditions</li> </ul>				<p>describe the process used to select the suite of conceptual models and associated simulations they have completed.</p> <p>Key will be an understanding of the zero flow phenomena and its influence on environmental response in Guntersville Reservoir. Also key will be an understanding of diffuser length, (i.e., 45 ft, 75 ft, and 120 ft), versus discharge rate, (i.e., 25-50 cfs, 51-100 cfs). Plant release is in the 25-50 cfs range.</p>					
5.3.3.1	Evaluation of the potential impacts caused by the heat dissipation system, such as weather modification due to cloud development and increased precipitation, shadowing and drift caused by the condensed plume, increased local humidity, and increased fogging and icing.	Yes	Yes	NA						
5.3.2.2	Has the applicant identified adverse impacts of cooling system discharge operation on aquatic biota? Have thermal, chemical, and physical alterations to the receiving water body been identified that may affect impacts? Will there be alterations in the discharge area (the mixing zone) or changes that will extend over a larger portion of the receiving-water body that might effect biota that are transported through, migrate through, or are attracted to the mixing zone?	Yes	Yes	NA						
5.3.2.2	Have measures or controls to limit adverse impacts been identified?	Yes	Yes	NA						

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
5.3.2.2	Has the applicant provided a current NPDES permit with a 316(a) determination (if required) or equivalent State permits and supporting documentation?	Yes	No	Yes	5.2.2.2.1 Current NPDES permit will need to be revised for new facility					
5.3.2.2	Are there “important” aquatic species present? Are the types, life stages, and relative abundance of impacted “important” biota described? Is there a description of the specific aspects of the proposed discharge-system operation responsible for the impacts on the biota?	Yes	No	Yes	5.3.2.2 More information needed to determine					
5.3.2.2	Are the aquatic species susceptible to heat shock resulting from facility cooling-system discharges to the receiving water bodies? Is there information to determine if the effects will be detectable or may destabilize or noticeably alter population levels?	Yes	No	Yes	5.3.2.2 Need references from Chapter 2 related to fish abundance in vicinity of discharge.					
5.3.2.2	Has the applicant considered the biological effects of thermal, chemical, and physical alterations to the receiving water body on the identified “important” aquatic species? Are there estimates of survival from these discharge system impacts, and estimates of the relative or absolute losses of the impacted populations?	Yes	No	Yes	5.3.2.2 Need reference related to 2007 survey for mussels and information specific to recreationally important species.					
5.3.3.2	Has the applicant identified the concentration and chemical composition of dissolved and suspended solids in cooling tower basins or spray canals on a seasonal basis?	Yes	No	Yes	Chemical concentrations are not provided on seasonal basis in Table 5.3-3. Suspended solids information is not provided.					
5.3.3.2	Has the applicant considered the impacts of drift deposition on facilities? Has the applicant identified isopleths of deposition at ground levels on a seasonal basis? Have they described natural and managed facility communities on the site and offsite that occur in isopleths above 20 kg/ha/yr?	Yes	Yes	NA						
5.3.3.2	Has the applicant described “important” terrestrial species and habitats that may be affected by the heat dissipation system?	Yes	Yes	NA						

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
5.3.3.2	Has the applicant considered the detrimental effects increased fogging/icing could have on local vegetation?	Yes	Yes	NA						
5.3.3.2	Has the applicant considered the impact to terrestrial biota when new shoreline habitats are created along ponds and reservoirs built for cooling purposes?	NA	NA	NA						
5.3.3.2	Has the applicant considered impacts to existing shoreline if flows are changes due to increased withdrawals?	Yes	No	Yes	No discussion of impacts of water level flux in Guntersville Res. or Town Creek Embayment					
5.3.3.2	Has the applicant identified adverse impacts of cooling system heat dissipation to terrestrial ecosystems and any measures or controls to limit adverse impacts?	Yes	Yes	NA						
5.3.4 III (1)	For an application with a plant that does not utilize a cooling system with cooling pond(s), lake(s), canals, or uses once-through cooling system with discharge to a river with a flow rate above $9 \times 10^{10} \text{ m}^3/\text{yr}$ ( $3.15 \times 10^{12} \text{ ft}^3/\text{yr}$ ): Has the applicant provided a statement why their cooling system has a limited potential for a causing an increase in thermophilic microorganisms that would have a deleterious effect on public health?	NA	NA	NA						
5.3.4 III (1, 2)	Has the applicant evaluated sources for generating noise associated with the cooling system (e.g., cooling towers and pumps)? Have they noise emission levels to the nearest offsite residence and to the site boundary? Is there a comparison of noise emission levels to State standards?	Yes	Yes	NA						
5.3.4 III (2, 3)	For an application with a plant that utilizes a cooling system with cooling pond(s), lake(s), canals, or uses once-through cooling system with discharge to a river with a flow rate below $9 \times 10^{10} \text{ m}^3/\text{yr}$ ( $3.15 \times 10^{12} \text{ ft}^3/\text{yr}$ ): Has the applicant consulted with the local State Public Health Department and reviewed records associated with waterborne disease outbreaks in the region? If there is a potential that thermal discharges	Yes	Yes	NA						

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	from the plant would increase the number of deleterious thermophilic microorganisms to levels that could cause a public health problem, has the applicant considered mitigative measures to minimize the potential impacts?									
5.4.1	Distances from the proposed reactor to the following points or areas for each of the 22½-degree radial sectors centered on the 16 cardinal compass directions: - Nearest site boundary - To a distance of 8 km (5 mi), each receptor and its location for the nearest residence, milk cow, milk goat, meat animal, and vegetable garden larger than 50 m <sup>2</sup> - If the applicant proposes elevated releases of radioactive effluents as defined in Regulatory Guide 1.111, the location of all milk cows, milk goats, meat animals, residences, and vegetable gardens larger than 50 m <sup>2</sup> out to a distance of 5 km (3 mi).	Yes	No	Yes	Table 2.7-119 is incomplete (e.g., no residences in 13 sectors and yet gardens in most sectors) and hard to reconcile with FSAR Figure 2.1-206.					
5.4.1	For the applicable locations noted above, the grazing seasons and fraction of daily intake of cows, meat animals, and milk goats derived from pasture or fresh forage during the grazing season.	Yes	No	Yes	Table 5.4-6 has some of this information, but not all, and conflicts with Table 2.7-119 on distance to nearest residence/house. Table 5.4-6 claims to define “Nearest” as “the location at which the highest radiation dose to an individual from the applicable pathways has been estimated. Locations by all compass directions and distances are not provided because the highest dose location is identified.” This reviewer would like to see all the results. The source of much					

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					of the data in Table 5.4-6 is not given.					
5.4.1	Fraction of the year that leafy vegetables are grown and the average absolute humidity in grams per cubic meter during the growing season.	Yes	Yes	NA						
5.4.1	The nearest present and known future locations from which an individual can obtain aquatic food and/or drinking water.	Yes	No	NA	Table 5.4-1 has some nonsensical entries. If these were used in other calculations, their results are suspect. The problem entries: Average Distance to Where Fish are Caught (mi.); Downstream Distance ... commercial fishing; Downstream distance... shoreline activities (mi.); Dilution Factor for Sport Fishing (mi.). The latter should not be in miles. These 4 entries have identi- cal values, which is not believable, especially since one of them should not be in miles.					
5.4.1	The nearest present and known future shoreline areas that an individual can use for recreational purposes.	Yes	No	NA	Table 5.4-1 has some nonsensical entries. If these were used in other calculations, their results are suspect. The problem entries: Average Distance to Where Fish are Caught (mi.);					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
					Downstream Distance ... commercial fishing; Downstream distance... shoreline activities (mi.); Dilution Factor for Sport Fishing (mi.). The latter should not be in miles. These 4 entries have identi- cal values, which is not believable, especially since one of them should not be in miles.					
5.4.1	For the two locations noted immediately above, the transit time of each facility discharge stream containing liquid radwaste discharge from the point at which the stream enters an unrestricted area to the identified location, and the estimated stream dilution at that location.	Yes	Yes	NA						
5.4.1	For each liquid radwaste discharge, the transit time from input to a facility discharge stream to the point at which the stream enters an unrestricted area, and the stream discharge in cubic meters per second.	Yes	Yes	NA	Values are in $\text{ft}^3 \text{s}^{-1}$ , not $\text{m}^3 \text{s}^{-1}$					
5.4.1	The following distributional data for each of the 22½-degree radial sectors centered on the 16 cardinal compass directions for radial distances of 2, 4, 6, 8, 10, 20, 40, 60, and 80 km (1.2, 2.5, 3.7, 5, 6.2, 12, 25, 27, and 50 mi) from the reactor: - Projected population for five years from the time of the licensing action under consideration - Present annual meat production (kg/yr) - Present annual milk production (liter/yr) - Present annual vegetable production (kg/yr) - Estimate of direct radiation doses from sources within the site.	Yes	No	Yes	Population for 2057, not 5 years. Meat, milk, vegetables are averages, not by compass point.					
5.4.1	The present commercial fish and invertebrate catch (in kg/yr) from waters within 80 km (50 mi) downstream (or 80-km [50-mi] radius for lake or coastal sites) of the facility radwaste	Yes	No	Yes	Major catch locations, distances, transit times (unless 0 is used) not specified.					



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	discharge; major catch locations, their distance from the facility radwaste discharge, and the amount caught within 80 km (50 mi) of the facility that is consumed; transit time from the point at which the discharge stream enters an unrestricted area to each major catch location, the estimated dilution at each location, and the basis for calculating transit time and dilution.				Dilution factors in Table 5.4-1 have some problems. If these were used in other calculations, their results are suspect. Dilution Factor for Sport Fishing (mi.) –should not be in miles.					
5.4.1	Present and known future drinking water intake locations within 80 km (50 mi) of the facility radwaste discharge (downstream or radius); the transit time and estimated dilution at each major location, the basis for calculating transit time and dilution, and the populations served or the daily water consumption at each location.	Yes	No	Yes	Table 5.4-1 has some nonsensical entries. If these were used in other calculations, their results are suspect. The problem entries: Average Distance to Where Fish are Caught (mi.); Downstream Distance ... commercial fishing; Downstream distance... shoreline activities (mi.); Dilution Factor for Sport Fishing (mi.). The latter should not be in miles. These 4 entries have identi- cal values, which is not believable, especially since one of them should not be in miles.					
5.4.1	The irrigation rate (liter/m2/month), crop yield (kg/m2), annual production (kg/yr), and growing period (days) for irrigated land using water withdrawn within 80 km (50 mi) of the facility radwaste discharge (downstream or radius) when crop production has the potential for contributing 10% or more to individual or population doses	Yes	No	Yes	There is little information on these parameters, and no statement that crop production has <10% dose contribution. § 5.4.2.1 states:					

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	because of liquid effluents; the crop type and its use (e.g., human consumption and meat animals), total crop production (by type) within the 80-km (50-mi) distance, and the amounts consumed within an 80-km (50-mi) radius of the facility; transit time from the point at which the discharge stream enters an unrestricted area to the points of withdrawal, estimated dilution at each withdrawal point, and the bases for calculating transit times and dilution factors.				“There is no record of crop or pasture downstream of the BLN site, therefore this pathway is not evaluated.” “There is no record of consumption of aquatic vegetation in the area surrounding the BLN site, therefore this pathway is not evaluated.”					
5.4.1	Unusual animals, plants, agricultural practices, game harvests, or food processing operations having the potential to contribute 10% or more to either individual or population doses in areas affected by liquid effluents, and food-processing operations involving large quantities of water.	Yes	Yes	NA						
5.4.2	Information related to exposure pathways, including - receptor locations - population distribution - meteorological dispersion data - hydrological dilution data.	Yes	Yes	NA						
5.4.2	Gaseous and liquid effluent data.	Yes	Yes	NA	Straight out of the AP1000 DCD					
5.4.2	Exposure rates associated with onsite out-of-plant storage of solid waste.	Yes	Yes	NA	No mention of onsite spent fuel storage.					
5.4.2	Applicant calculated dose data.	Yes	Yes	NA						
5.4.2	Occupational radiation dose estimates.	Yes	Yes	NA						
5.4.3	Data on water use to support the analysis of public dose from waterborne sources.	Yes	Yes	NA						
5.4.3	Estimated individual and collective doses.	Yes	Yes	NA						
5.4.3	Maximum site-specific doses to members of the public.	Yes	Yes	NA						
5.4.3	Dose consequences and health effects associated with normal operational effluents.	Yes	Yes	NA						
5.4.3	Summary of the maximum individual and collective dose estimates.	Yes	Yes	NA						

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5.4.3	Radiation dose data including - Maximum individual doses from liquid effluents - Maximum individual doses from gaseous effluents - Maximum individual doses from direct radiation sources - Collective doses to the population within 80 km (50 mi) of the facility - Occupational collective doses.	Yes	Yes Yes No No	NA NA NA Yes Yes	The only collective dose mentioned is under construction workers, fuel cycle and from background.					
5.4.3	Natural radiation doses that are generally applicable to the site.	Yes	Yes	NA	Note: NCRP (1987) is undergoing revision – new <i>natural</i> doses for Alabama will be lower from radon and cosmic. Also, the applicant included medical doses in calculation.					
5.4.4	A list of the biota to be considered in this evaluation.	Yes	Yes	NA						
5.4.4	Site-specific pathways for radiation exposure to biota.	Yes	Yes	NA						
5.4.4	Doses to the maximally exposed individual.	Yes	Yes	NA						
5.5.1	Descriptions of nonradioactive waste systems, including quantities, composition, and frequency of waste discharges to water, land, and air.	Yes	Yes	NA	Note: Presume laboratory waste discharged to Towne Creek contains no rad.					
5.5.1	For discharges to water, waste concentrations at the point of discharge, predicted dilution in the receiving water body, and estimates of concentrations at various distances from the discharge point.	Yes	Yes	NA	Note: No predicted dilution in environment					
5.5.1	Ambient concentrations in the receiving water body of the chemicals and other materials contained in the waste discharges.	Yes	Yes	NA						
5.5.1	Receiving water body water-quality criteria for domestic, industrial, agricultural, and recreational uses.	Yes	Yes	NA	Note: Applicant cites the NPDES permit as protective of water quality for the receiving stream, so					

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					not shown for different uses.  Water quality is described in Section 2.3.3 and data provided in Table 2.3-39 for surface water, and in Table 2.3-44 for groundwater					
5.5.1	Water use for the receiving water bodies.	Yes	Yes	NA						
5.5.1	Aquatic ecology for the receiving water bodies.	Yes	Yes	NA						
5.5.1	For discharges to land (other than at licensed commercial waste disposal sites), size and location of disposal sites, quantity and composition of wastes, and method of disposal (e.g., burial, combustion, and evaporation).	Yes	Yes	NA	Note: There are none – all solid wastes are scheduled for off-site disposal in permitted facilities.					
5.5.1	Terrestrial ecology at disposal sites other than licensed commercial sites.	Yes	Yes	NA	Note: There are none – all solid wastes are scheduled for off-site disposal in permitted facilities.					
5.5.1	Soil data for disposal site (other than licensed commercial sites), and potential for transport of wastes to ground and surface waters.	Yes	Yes	NA	Note: There are none – all solid wastes are scheduled for off-site disposal in permitted facilities.					
5.5.1	Plans for ultimate treatment and/or restoration of retired disposal sites (other than licensed commercial sites).	Yes	Yes	NA	Note: There are none – all solid wastes are scheduled for off-site disposal in permitted facilities.					

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5.5.1	Applicable Federal, State, regional, local, and affected Native American tribal criteria or standards for air quality and for solid-waste disposal to land areas.	Yes	Yes	NA	Note: There are none – all solid wastes are scheduled for off-site disposal in permitted facilities.					
5.5.1	Other site-specific waste-disposal activities (e.g., spoils from intermittent dredging activities).	Yes	No	Yes	The only land disposal (on-site) item mentioned in the ER is dredge spoils. No location, quantity, composition information is provided.				No	Section 4.3.1 Terrestrial ecology.
5.5.1	Applicant's NPDES permit and water quality certification or their status if not issued.	Yes	Yes	NA						
5.5.2	Descriptions of systems that create mixed wastes, including quantities of waste produced.	Yes	Yes	NA						
5.5.2	Anticipated disposal plans for the mixed wastes (i.e., disposal at a mixed waste disposal facility, shipment to a treatment facility, or storage onsite).	Yes	Yes	NA						
5.5.2	Estimated environmental impacts, including health effects resulting from exposure to the chemical constituents and those resulting from radiological exposures that are estimated to be received by workers as a result of mixed-waste testing and storage.	Yes	Yes	NA						
5.5.2	A waste minimization plan that identifies process changes that can be made to reduce or eliminate mixed wastes.	Yes	Yes	NA						
5.6.1	Has the applicant described the maintenance practices, such as use of chemical herbicides, roadway maintenance, and mechanical clearing, that are anticipated to affect terrestrial biota, including sensitive agricultural crops?	Yes	Yes	NA						
5.6.1	Does the applicant use any special maintenance practices used in important habitats (e.g., marshes, natural areas, and bogs), including those that result in unique beneficial effects on specific terrestrial biota?	Yes	Yes	NA						

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5.6.1	Does the applicant partake in any wildlife-management practices?	Yes	No	Yes	No mention of wildlife practices					
5.6.1	Has the applicant identified any potential adverse impacts resulting from operation and maintenance activities include soil erosion, runoff or uncontrolled release of defoliant and herbicides, barriers to wildlife movements created by clear-cutting of trees, and subtle effects of high energy electrical fields on the behavior of animals?	Yes	Yes	NA						
5.6.1	Has the applicant identified the operational and maintenance activities associated with transmission facilities that could impact “important” terrestrial species and habitats?	Yes	Yes	NA						
5.6.1	Has the applicant identified a list of the impacts for which there are measures or controls to limit adverse impacts and the associated measures and controls? Has the applicant made a commitment to limit these impacts?	Yes	Yes	NA						
5.6.2	Has the applicant identified operational and maintenance activities associated with transmission facilities that could adversely affect “important” aquatic species and habitats? The resources to be considered include marshlands, wetlands, impoundments, and water bodies.	Yes	No	Yes	5.6.2 Need reference or copy of procedures used by TVA for ROW maintenance near aquatic ecosystems.					
5.6.2	Have potential impacts on these resources been identified? These could include heating of water bodies from removal of shade trees, siltation and turbidity resulting from increased runoff and erosion, runoff of defoliant and herbicides, recreational access by the public, and high energy electrical fields associated with underwater transmission facilities.	Yes	Yes	NA						
5.6.2	If adverse impacts of sufficient magnitude have been identified, has the applicant identified the potential mitigating actions or alternative practices to limit or avoid the impacts?	Yes	No	Yes	5.6.2 Need reference or copy of procedures used by TVA for ROW maintenance near aquatic ecosystems.					
5.6.3 III (not required)	<i>Exposure to electric and magnetic fields</i>	NA	NA	NA						

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5.6.3 III (1)	Electrostatic effects (electric shock): design parameters for reducing electric shock potentials to moving vehicles, such as school buses and tractor trailers	Yes	Yes	NA						
5.6.3 III (1)	Maximum predicted noise levels at the edge of rights-of-way resulting from transmission system operation, and the bases for these predictions	Yes	Yes	NA						
5.6.3 III (2)	There are no ozone impacts, that is, transmission lines are 765 kV or less	Yes	Yes	NA						
5.6.3 III (3)	Steady-state currents are evaluated and limited by conformance with NESC	Yes	Yes	NA						
5.7	Comparison of estimated impacts from the proposed facility to those listed in ESRP 5.7, Appendix A containing the current amendments to Table S-3 of Paragraph (a) of 10 CFR 51.51, as given in 49 FR 9381 and 49 FR 10922.	Yes	Yes	NA						
5.7	As applicable, a discussion of features of the proposed facility that could result in environmental impacts that differ substantially from those estimated by the NRC for model LWRs. Evaluation of the impacts from the proposed facility demonstrating they are bounded by the impacts listed in the ESRP.	Yes	Yes	NA						
5.8.1	Distribution of people, buildings, roads, and recreational facilities that are vulnerable to impact by facility operation (from the ER).	Yes	Yes	NA						
5.8.1	Predicted noise levels and nonradiological air pollutant levels at sensitive areas as identified above.	Yes	Yes	NA						
5.8.1	Applicable standards for levels of noise and gaseous pollutants.	Yes	Yes	NA						
5.8.1	Applicant's proposed methods to reduce visual impacts and impacts of noise and other pollutants.	Yes	Yes	NA	Provide additional discussion.					
5.8.2	Expenditures within the region for materials and services during operation.	Yes	No	Yes	Section 5.8.2.2 bases the estimate on a regional model, but text does not discuss expenditures for materials and services or provide					

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					any specific information, as it also did not in Section 4.4.2.					
5.8.2	Plans to adjust public facilities and services during the transition period from the construction to the operation phase and agencies responsible for accomplishing this adjustment.	Yes	No	Yes	Section 5.8.2.3.1 does not consistently reflect that in most cases transition to the operations stage will require downsizing, rather than a further increase in capacity in local infrastructure.					
5.8.2	Taxes by type and jurisdiction to be paid annually during operation.	Yes	No	Yes	Section 5.8.2.2.1 Provide estimates of taxes, and relate expected revenues to expected needed expenditures					
5.8.2	Annual operation labor force.	Yes	Yes	NA	Section 5.8.2.1 Provide specific demographic information about the expected workforce, or the annual workforce during build up and outages.					
5.8.3	Pathways where any environmental (including socioeconomic) impact during operations may interact with cultural or economic facts that may result in disproportionate environmental impacts on minority and low-income populations.	Yes	No	Yes	5.8.3 Provide analysis of special pathways or vulnerabilities pertinent to minority populations					
5.8.3	Any assessment (qualitative or quantitative, as appropriate) of the degree to which each minority or low-income population would disproportionately experience adverse human health or environmental (including socioeconomic) impacts during operations as compared with the entire geographic area. In addition, information should be obtained on any assessment comparing the impacts with the	Yes	No	Yes	5.8.3 Provide analysis of special pathways or vulnerabilities pertinent to the minority populations.					



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	larger overall geographic area encompassing all of the alternative sites.									
5.8.3	Any assessment (qualitative or quantitative, as appropriate) of the significance or potential significance of such environmental impacts on each minority and low-income population.	Yes	No	Yes	5.8.3.4 makes only the most perfunctory conclusionary statement. A referenceable source for this information is needed.					
5.8.3	Any assessment of the degree to which each minority and low-income population would disproportionately receive any benefits compared with the entire geographic area.	Yes	No	Yes	5.8.3.3 makes only the most perfunctory conclusionary statement. A referenceable source for this information is needed.					
5.9	A report as specified in 10 CFR 50.75(b)(I) and required by 10 CFR 50.33(k) containing a certification that financial assurance for radiological decommissioning will be provided.	Yes	Yes	NA						
5.10	Listing of potentially adverse impacts: - noise - erosion - effluents and wastes - surface-water impacts - groundwater impacts - terrestrial ecosystem impacts - aquatic ecosystem impacts - socioeconomic impacts - other site-specific impacts.	Yes	Yes	NA	NA					
5.10	Proposed design or planned control program in each of the above areas.	Yes	Yes	NA						
5.10	Proposed control or operational procedures in each of the above areas.	Yes	Yes	NA						
6.1	The following list of data describing the THERMAL MONITORING should be provided: - maps showing: (a) features of the plant and site, including the boundaries and bathymetry of all water bodies adjacent to the site both before and after construction	Yes	Yes	NA	Notes: The pre-application monitoring program is described in the ER.					

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	<p>activities, (b) the location of all thermal, hydrological, or aquatic biological monitoring stations, and (c) the predicted extent of the thermal plume</p> <ul style="list-style-type: none"> <li>- the type and frequency of temperature measurements taken at each location, as well as the duration of each monitoring program</li> <li>- descriptions of the monitoring equipment used</li> <li>- descriptions of the data analysis procedures used</li> </ul>				The process to define the pre-operational monitoring program is discussed, but the resulting monitoring program is not described.					
6.2	A map or aerial photograph of the site vicinity with proposed monitoring and sampling locations identified and indicating the medium sampled at each location. The map or photograph should be suitable to show distance and direction of each location from the facility, particularly with regard to the effluent release points.	Yes	Yes	NA						
6.2	A description of the proposed monitoring program including: - number and location of sample collection points and measuring devices and the pathway sampled or measured - sample size, sample collection frequency, and sampling duration - type and frequency of analysis - general types of sample collection and measuring equipment - lower limit of detection for each analysis - the approximate date on which the proposed program will be effective - the quality-assurance program for radiological environmental monitoring programs.	Yes	Yes	NA						
6.2	A discussion justifying the choice of sample sites, analyses, sampling frequencies, sampling and measuring durations, sample sizes, and lower limits of detection.	Yes	Yes	NA						
6.3	<p>The following list of data describing the HYDROLOGICAL MONITORING should be provided:</p> <ul style="list-style-type: none"> <li>- maps showing (a) features of the plant and site, including the boundaries and bathymetry of all surface-water bodies</li> </ul>	Yes	Yes	NA	Note: Figure 2.3-9 showing the bathymetry of the surface water in the vicinity of Bellefonte shows the bathymetry					

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	<p>(including springs) adjacent to the site both before and after construction activities, (b) the locations of all hydrological (including groundwater monitoring wells), thermal, and aquatic biological monitoring stations, (c) locations of all wells potentially influenced by plant construction and operation, and (d) major geomorphic features (e.g., floodplains) and regional geology</p> <ul style="list-style-type: none"> <li>- site vicinity surface and groundwater average and extreme velocities and flow rates</li> <li>- sediment transport (suspended and bed load) characteristics and erodability of the site soil</li> <li>- the type and frequency of data collected at each location as well as the duration of each monitoring program</li> <li>- descriptions of the monitoring equipment used</li> <li>- descriptions of the data analysis procedures used</li> <li>- documentation of data quality objectives (if any)</li> </ul>				<p>of Guntersville Reservoir, but not Towne Creek. The SAR notes that depth of the embayment ranges from 2 to 10 ft, and is in general less than 5 ft.</p> <p>Need to learn the potential frequency of dredging required during operation of the proposed plant, i.e., intake and discharge structure regions, and the monitoring required.</p>					
6.5.1	Did the applicant complete any pre-application monitoring to examine the distribution and abundance of “important” species and habitats? Critical life history information should include parameters such as feeding areas, wintering areas, and migration routes to the extent that the proposed project is expected to affect these parameters.	Yes	Yes	NA						
6.5.1	Is the applicant planning on completing pre-operational/operational monitoring related to terrestrial resources? If so, what will each program entail (both in schedule and scope)?	Yes	Yes	NA						
6.5.1	Has the applicant supplied a basis for the decision to conduct/not conduct monitoring (pre-application/preoperational/operational)?	Yes	Yes	NA						
6.5.2	Did the applicant complete any pre-application monitoring to examine the distribution and abundance of “important” species and habitats?	Yes	No	Yes	6.5.2.1 Copies of surveys referenced in this section are needed.					

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	Critical life history information should include parameters such as spawning areas, nursery grounds, food habits, feeding areas wintering areas, and migration routes to the extent that the proposed project is expected to affect these parameters.									
6.5.2	Is the applicant planning on completing preoperational/operational monitoring related to aquatic resources? If so, what will each program entail (both in schedule and scope)?	Yes	Yes	NA						
6.5.2	Has the applicant supplied a basis for the decision to conduct/not conduct monitoring (preapplication/preoperational/operational)?	Yes	No	Yes	6.5.2.2 Need basis for determination that the current monitoring program is appropriate for the Bellefonte site.					
6.6	The following list of data describing the CHEMICAL MONITORING should be provided: <ul style="list-style-type: none"> <li>- systems to be sampled</li> <li>- location of sampling stations</li> <li>- type of sample (e.g., surface grab or depth composite), number of replicates, and method of collecting the sample</li> <li>- time of day, time period, and frequency of sampling</li> <li>- methods of preserving the samples</li> <li>- analytical methods used</li> <li>- description of automated monitoring systems used</li> <li>- reference or calibration standards used to verify accuracy of methods</li> <li>- statistical methods used to interpret results</li> <li>- quantitative data on chemical characteristics of surface-water and/or groundwater in the site and vicinity, including seasonal ranges and averages and historical extremes.</li> <li>- data quality objectives</li> <li>- quality assurance procedures.</li> </ul>	Yes	Yes	NA						

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6.7	Description of the onsite meteorological measurement program including a description of the local topography of the site and the location of the meteorological tower(s).	Yes	Yes	NA						
6.7	Discussion of the meteorological measurements, instrumentation, and elevation of the instruments above grade.	Yes	Yes	NA						
6.7	Discussion of instrument calibration and maintenance procedures, output and recording systems, and data analysis procedures, including quality control.	Yes	Yes	NA						
6.7	Site preparation and construction monitoring commitments.	Yes	Yes	NA						
6.7	Preoperational monitoring commitments.	Yes	Yes	NA						
6.7	Operational monitoring commitments.	Yes	Yes	NA						
7.1	Is the exclusion area boundary definition consistent throughout the ER and Site Safety Analysis Report (SSAR) or Final Safety Analysis Report (FSAR)? If other nuclear facilities are located on the site, is the proposed exclusion area boundary (EAB) consistent with EAB definitions for the other facilities?	Yes	Yes	NA						
7.1	Is the low population zone definition consistent throughout the ER and SSAR/FSAR? If other nuclear facilities are located on the site, is the proposed low population zone consistent with low population zone definitions for the other facilities?	Yes	Yes	NA						
7.1	Are the meteorological data used to calculate X/Qs for DBA analyses the same as the data used to calculate X/Q for routine releases?	Yes	Yes	NA						
7.1	Have the meteorological data on which the X/Q values are based been provided to NRC?	Yes	Yes	NA						
7.1	Does the ER list the name, version number, and date for any computer code used to calculate the X/Qs used for DBAs?	Yes	Yes	NA						
7.1	Has the applicant provided NRC with electronic copies of the input to and output from these codes?	Not known	Not known	Yes	If not already provided, electronic copies of code input					

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					and output files for X/Q computations will be needed					
7.1	Does the ER contain a list of DBAs, and are they the same as the DBAs in the SSAR/FSAR?	Yes	Yes	NA						
7.1	If the reactor design is certified or undergoing certification, are the DBAs the set of DBAs covered in the design control document or FSAR? If the reactor design is not certified or undergoing certification, are the DBAs listed in ESRP 7.1 Appendix A, included in the DBA analysis in the ER?	Yes Yes	Yes Yes	NA	The information is provided but the application is based on revision 16 which has not yet been approved.					
7.1	Are isotopic source terms provided for each DBA?	Yes	Yes	NA						
7.1	Does the ER appropriately reference a document that describes each DBA and underlying assumptions? If not, does the ER provide a description of each DBA?	Yes	Yes	NA						
7.1	Are the EAB DBA doses given in the ER consistent with doses calculated from the isotopic source terms?	Yes	Yes	NA						
7.1	Are the LPZ X/Qs calculated consistently with NRC guidance?	Yes	Yes	NA						
7.1	Are the LPZ DBA doses given in the ER consistent with doses calculated from the isotopic source terms?	Yes	Yes	NA						
7.1 10 CFR 50.34(a)(1)(i) Regulatory Guide 1.183	Are EAB doses calculated for the two-hour period giving the highest dose? Is the two-hour period identified?	Yes Yes	Yes Yes	NA						
7.1 10 CFR 50.34 SRP 15	Are EAB DBA doses less than dose limits and criteria set for safety reviews?	Yes	Yes	NA						
7.1 10 CFR 50.34 SRP 15	Are LPZ DBA doses less than dose limits and criteria set for safety reviews?	Yes	Yes	NA						
7.1 10 CFR 50 App K SRP 15.6.5	Are DBA doses calculated for a reactor operating at 102% of design power (design power +2% for power measurement uncertainties, where required (e.g., LOCA)?	Yes	Yes	NA						

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7.1 10 CFR 100	Is the exclusion area boundary definition appropriate?	Yes	Yes	NA						
7.1 10 CFR 100 NUREG-0654	Is the low population zone definition appropriate?	Yes	Yes	NA						
7.1 Regulatory Guide 1.145	Are the X/Q values used for DBA analyses, for representative (50%) meteorological conditions? If so, were the procedures used to calculate the X/Q values consistent with NRC guidance?	Yes	Yes	NA						
7.1 Regulatory Guide 1.3, 1.4, 1.145, 1.183	Are DBA LPZ doses calculated for four time periods as indicated in ESRP 7.1, and Regulatory Guides 1.3, 1.4, 1.145, etc.	Yes	Yes	NA						
7.1 Regulatory Guides 1.3, 1.4, 1.183	Do the DBA doses appropriately account for changes in breathing rates?	Yes	Yes	NA						
7.2	Does the ER contain a site-specific evaluation the potential impacts of severe accidents based results of a recognized tool such as the MACCS2 code?	Yes	Yes	NA						
7.2	If so, what are the name, version, date, etc. for the code used?	Yes	Yes	NA	Oak Ridge National Laboratory RSICC Computer Code Collection MACCS2 V.1.13.1, CCC-652 Code Package, p 7.2.2					
7.2	What meteorological data were used in the evaluation? Are they the same data used in evaluation of the impacts of normal operation and DBAs? If not, why not? (Check with meteorology project reviewer)	Yes Yes	Yes Yes	NA						
7.2	What population data were used in the evaluation? Are the data consistent with data presented in the demographic discussion? Are population projections based on the most recent census and appropriate projection techniques? (Check with socioeconomic project reviewer)	Yes	No	Yes	Information is needed on why current census data are used with no projection to start up time.					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
7.2	What land use data were used in the evaluation? Were they adjusted for potential changes in land use? (Check with land use project reviewer)	Yes No	No	Yes	There is no discussion in Section 7.2 as to potential changes in land used.					
7.2	Does the ER contain a list of surface water users within 50 miles of the site, including all public water supplies and major industrial and agricultural users? Does the list include location and withdrawal rate of each user? (Check with hydrology project reviewer)	Yes	No	Yes	Table 2.3-31 showing local surface water users omits distance and location information per 10 CFR 2.390(a)(3). All counties bordering the Tennessee River within the 50 mile radius are not reported in this table. It is anticipated this information will be available at the site audit.					
7.2	Does the ER contain a list the postulated severe accidents, their descriptions, and their respective core damage frequencies? If so, is the list consistent with accidents considered in a design control document or FSAR for the reactor type?	Yes  Yes	Yes	NA						
7.2	Has the applicant provided electronic copies of the input to and output from the computer code?	Not known	Not known	Yes	If not already provided, electronic copies of code input and output files for X/Q computations will be needed					
7.2	Does the severe accident analysis in the ER consider the atmospheric, surface water, and groundwater pathways?	Yes	No	Yes	Need to provide modeling details for surface water pathway results given in ER. Also need to provide some information on groundwater pathway.					



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		2.	3.	4.	5.	7.	8.	9.	10.	11.
7.2	Does the severe accident analysis include output for socioeconomic, individual and population health effects?	Yes	Yes	NA						
7.2	If the application references a reactor design other than a certified design, does the ER list the dominant severe accident sequences?	NA	NA	NA						
7.2	Are these effects adequately reflected in the ER in terms of risk?	NA	NA	NA						
7.3	Does the ER (or SSAR/FSAR) contain a list of leading contributors to (1) core damage frequency, (2) large release frequency, and (3) dose consequences with and without mitigation?	Yes Yes Yes	Yes	NA						
7.3	Does the ER (or SSAR/FSAR) contain a description of the method, rationale, or process used to identify, screen, and select design alternatives and procedural modifications?	Yes	Yes	NA						
7.3	Does the ER contain the estimated cost, risk reduction, and value impact ratios for the selected SAMAs along with the underlying assumptions?	Yes	Yes	NA						
7.3	A list of SAMAs that have been or will be implemented to prevent or mitigate the impacts from severe accidents or to reduce the risk of a severe accident?	Yes	Yes	NA						
7.4	Does this section contain a statement about the comparison of the applicant's spent fuel characteristics with respect to the 10 CFR 51.52(a) conditions?	Yes (Sec 7.4.2)	Yes	Yes	NA					
7.4	Does this section specify the estimated distance from the proposed reactor site to the spent fuel disposal facility?	No	No	Yes	Shipping distances were not provided in Sections 3.8 or 7.4.					
7.4	If the spent fuel is not in compliance with 10 CFR 51.52(a), does the ER contain an analysis of the environmental effects of transportation accidents that could occur?	No	No	Yes	A full and detailed analysis of transportation impacts is not provided as required by 10 CFR 51.52(b)					
8.1	Description of the relevant service area(s), including (1) a map of the service area showing the location of the proposed facility relative to the service area, (2) how the output from the	Yes	Yes	NA		Yes			No, needs to be consistent with socio-	Socioeconomics 2.5.1 (Demography) and 2.5.2

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
	facility will be connected to the transmission and distribution grid system, (3) transmission and intertie, including capacity, constraints within the service area, and (4) new transmission capacity if required.								economic information	Community Characteristics), which do not provide data in an easily comparable format. Sources and methods do not appear to be coordinated.
8.1	Number and types of customers and major electrical load centers in the relevant service area.	Yes	No	Yes	8.1 No references to sources of numbers throughout					
8.1	System factors that are unique to the power system (e.g., power pool agreements and reserve margin requirements).	Yes	Yes	NA						
8.2.1	Methodology, assumptions, and information sources used to develop the forecasts of electricity consumption, peak load demand, and load factor.	Yes	No	Yes	8.1 and 8.2 – Describes the models, but does not provide any specific detail or references to documentation					
8.2.1	Chart or table of historical and projected yearly electricity consumption, system peak-load demand, and load factor for the relevant service area(s) and principal reasons for the increase in consumption/demand and shifts in the load factor.	Yes	Yes	NA						
8.2.1	Results of any independent assessments of the forecasted electricity consumption and peak load demand.	Yes	No	Yes	8.2.1.2 and 8.2.2					
8.2.1	Comparison of forecasted electricity consumption and peak load demand to other independent forecasts and reasons for significant differences.	No	No	Yes	8.2					
8.2.1	Identification of expected customers (or firm power sales) for the power to be supplied by the proposed facility and any signed agreements for the purchase of the power; obtain estimate of forecasted power sales by the applicant in the relevant service area [Note: this information is likely to be business sensitive and/or proprietary information].	Yes	Yes	NA						

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
8.2.2	Historical and projected economic, weather, price of electricity, energy mix, and demographic/population trends that are driving the growth in electricity demand.	Yes	Yes	NA						
8.2.2	Methodology and information sources used to develop the forecast of economic, weather, price of electricity, energy mix, and demographic/population trends.	Yes	No	Yes	8.2 A referenceable source for this information is needed.					
8.3	Description of the electricity supply mix in the relevant service area, historical and projected contribution of each to total annual electricity consumption and peak-load demand, and factors driving the change in electricity supply mix.	Yes	Yes	NA						
8.3	Description of the methodology, assumptions, and information sources used to develop the forecast of electricity supply mix.	Yes	No	Yes	8.2 A referenceable source for this information is needed.					
8.3	Identification of offsite areas by land use, size, and location (from site visit, and consultation with Federal, State, regional, local, and Native American tribal agencies)	Yes	Yes	Yes	8.3 includes no text and tables are only withheld data, but addressed in 2.2.3	Yes			Yes	Not addressed in Chapter 8, only in other chapters.
8.3	Identification of existing power facilities that serve the relevant service area, and their associated electricity generation capacity, whose retirement has been announced or is anticipated within a few years before and after start of operation of the applicant's proposed facility.	No	No	Yes	8.3 includes no text and tables are only withheld data					
8.3	Identification of firmly committed new facilities and proposed new facilities that will serve the relevant service area, and their associated electricity generation capacity, that are expected to start operation between a few years before and after start of operation of the applicant's proposed facility.	No	No	Yes	8.3 includes no text and tables are only withheld data					
8.3	Estimate of forecasted electricity supply by the applicant in the relevant service area and source of the supply (e.g., existing facilities co-owned by the applicant, purchased power, and new capacity) area [Note: this information is likely to be business sensitive and/or proprietary information].	Yes	Yes	NA						
8.4	Historical and projected reserve margin for the relevant service area.	Yes	Yes	NA						

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
8.4	Applicant's historical and projected reserve margin, and how this changes with the proposed new facility; identify any agreements with government/semi-government entities to maintain a minimum reserve margin and/or reserve margin range in the relevant service area.	Yes	Yes	NA						
9.1	Discussion of the no-action alternative.	Yes	Yes	NA						
9.2.1	The administrative structure of the current generating supply system in the relevant regional grid and the applicant's relationship to this structure in terms of current and projected power supply. Full account should be taken of non-discriminatory access rules as promulgated by the Federal Energy Regulatory Commission (FERC).	Yes	Yes	NA						
9.2.1	The projected regional system reserve margins of relevant electric utilities and other generators should be for a six-year period starting with the first year of commercial operation of the proposed facility.	NA* <sup>1</sup> / Yes	Maybe	NA	(References Section 8.4; however, all of this information is withheld for proprietary reasons citing 10 CFR 2.390)					
9.2.1	The projected peak loads of the electric utilities in the area being served, load duration curve, and baseload for the same six-year period.	NA*/Yes	Maybe	NA	(References Section 8.4; however, all of this information is withheld for proprietary reasons citing 10 CFR 2.390)					
9.2.1	Transmission inertia capability within the relevant region's facility and between the systems identified in the first bulleted item in this list during the initial years of facility operation.	NA*/Yes	Yes	NA						
9.2.1	A list of the facilities in the relevant service area scheduled for retirement during the period extending from date of application through the sixth year of commercial operation of the proposed project, including existing nuclear power facilities within the relevant region that are near the end of their license and are	Yes	Yes	NA						

<sup>1</sup> NA\* indicates that during the South Texas Acceptance Review it was determined that this subject was Not Applicable (this typically means it is not priority in revised ESRP); however, as it is still in the ESRP and for my own notes, I am including some detail.

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	candidates for license renewal. Power facilities available for reactivation should also be considered.									
9.2.1	The expected facility generating capacity, projected availability factor, environmental impacts, and operating costs (including capital costs required to put the unit back online) of any facilities with the potential for reactivation or extended operation.	Yes	Yes	Yes	Could expand. Does not expect retirement of units, but mentions possibility of upgrading units and license renewal “at the appropriate time.” Mentions (9.2.1.2) “extending the service life of existing [fossil] plants not a reasonable alternative.”					
9.2.1	The potential for energy conservation within the relevant service area.	Yes	Yes	NA						
9.2.2	For alternatives that have not yet achieved commercial acceptance, U.S. Department of Energy research, development, and demonstration/commercialization schedules and projected capability as a source of central station power.	Yes	Yes	NA	No technologies identified; thus follow-up question to verify that none are relevant.					
9.2.2	For nonrenewable fuels (coal, natural gas, and petroleum fuels), the fuel quality, availability to the applicant, rate of consumption estimates, potential environmental restrictions and impacts, and emissions and definition of U.S. national policy, if any, with respect to new uses of these fuels.	Yes	Yes	Yes	This section does not include any references. Referenceable sources for this information are needed.					
9.2.2	For renewable fuels (wind, geothermal, hydroelectric, wood waste and municipal solid waste, energy crops, and solar), availability to the applicant, quantities needed, potential environmental restrictions, amount of land that would be occupied, and amount of the fuel available.	Yes	Yes	Yes	This section does not include any references.					
9.2.3	Decommissioning cost for the proposed project and for each alternative.	Yes	No	Yes	This topic was not directly addressed for the alternatives.					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
9.2.3	Where relevant, the fixed charge rate for the utility or consortium of utilities.	NA	NA	NA	Not addressed, so assuming not applicable, but will need to verify.					
9.2.3	Fuel cost estimates at time of application for the proposed project and for other alternatives.	NA* <sup>1</sup>	NA*	NA						
9.2.3	The operation and maintenance cost estimates (fixed component and variable component) at time of application for the proposed project and each alternative.	NA*	NA*	NA						
9.2.3	The escalation rates from date of application through facility lifetime (30-year life) for the components of operation and maintenance and fuel for the proposed project and each alternative.	NA*	NA*	NA						
9.2.3	The discount rate for the proposed project and each alternative.	NA*	NA*	NA						
9.3	The objectives of the alternative site selection process.	Yes	Yes	NA						
9.3	The basic constraints and limitations (e.g., rules, regulations, and laws), giving the basis and rationale for the alternative site selection process.	Yes	Yes	Yes	They go from a list of 200 to 24 to 9 sites, but it appears that this is based on unreferenced study that took place in the 1970s, although they allude to the fact that "re-evaluation" has taken place.					
9.3	The selection procedures for the region of interest (ROI), candidate areas, potential sites, candidate sites, and proposed site.	Yes	Yes	NA						
9.3	The basis for establishing the geographical scope of the ROI.	Yes	Yes	NA						
9.3	The factors considered at each level of the selection process, parameters by which these factors were measured, and criteria used to define levels of quality (e.g., numerical limits or decision standards).	Yes	Yes	Yes	They briefly summarize the criteria, but you cannot directly link up the resulting					

<sup>1</sup> NA\* indicates that during the South Texas Acceptance Review it was determined that this subject was Not Applicable (this typically means it is not priority in revised ESRP); however, as it is still in the ESRP and for my own notes, I am including some detail.

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
					ratings with the criteria. Site-specific and rating questions are likely.					
9.3	The criteria used to screen potential sites.	Yes	Yes	NA						
9.3	The methodologies used in the candidate site comparison process, including (when used) factors such as (1) importance factors, (2) preference functions, (3) utility functions, (4) weighing factors, (5) ranking scales, (6) scoring schemes, (7) rating systems, and (8) sensitivity analyses.	Yes	Yes	Yes	Made reference to an optimization model; however no further citation is provided.  Referenceable sources for this information are needed.					
9.3	A description of the geographic area considered by the applicant, including the following: <ul style="list-style-type: none"> <li>- major centers of population</li> <li>- areas predicted to be deficient in power</li> <li>- economic, demographic, and community characteristics</li> <li>- minority and low-income populations</li> <li>- water bodies available for cooling</li> <li>- railroads, highways, and waterways (existing and planned)</li> <li>- topographic features</li> <li>- major land-use classifications (e.g., residential, agricultural) and areas reserved for specific uses</li> <li>- location and description of existing and planned primary electrical generating stations</li> <li>- existing and planned transmission network</li> <li>- transmission interconnections with other utilities</li> <li>- natural and man-made features (e.g., zones of seismic activity, unusual geologic features, military installations) constituting potential hazards to construction or operation of a nuclear power facility.</li> </ul>	Yes	Yes	Yes	The ER considers most, but not all criteria and provides an insufficient amount of detail for some. ER also relies heavily on past acceptance (from 30 years ago) without providing clear updated descriptions.					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
9.3	Descriptions of the following: – ROI – potential sites (including all sites within the ROI with an operating nuclear power facility or a construction permit for a nuclear power facility) – candidate sites – alternative sites.	Yes	Yes	Yes	These topics are covered, but it is not at all clear whether or not any of this information is current.					
9.3	Descriptions of how the site- selection process was used to identify and select the ROI and potential, candidate, and alternative sites.	Yes	No	Yes	They apparently went from 24 sites to 9 candidate sites; however, there is no information on this step. The way it reads, it appears as though they had 9 sites in which they had some sort of affiliation (ownership stake), of which 4 were immediately eliminated based on one the available land-use and cooling water criteria (I would have thought that by the time they went from 200 to 9 candidate sites, that these 4 would have already been eliminated). The resulting alternative sites are probably okay, but the lack of details and complete absence of current references, makes it difficult to conclude that these sites were the “best available sites” in 2006.					



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		2.	3.	4.	5.	7.	8.	9.	10.	11.
9.3	Data sources used in the site-selection process, including results of site-specific field investigations.	Yes	No	Yes	The key studies they cite are all the original EIS's completed in 1974, 1975, 1977, and 1978. There are no updated references, so it is difficult to have confidence in any of the numbers provided.					
9.3	Land-use descriptions for alternative sites	Yes	No	Yes	More information is needed regarding the exact condition of the sites (for brown- fields) – both how TVA left them when it ceased construction and sold sites and the current land-use activities on the site. All references are dated. Aerial photos of sites provided, but text descriptions are insufficient.					
9.3	Transmission Lines at alternative sites	Yes	Yes	Yes	Transmission ROWs identified on maps and transmission used as evaluation criteria – follow-up questions needed regarding Table 9.3-1 rating on “Transmission Access Cost” (seem inconsistent with information presented in text and map). Generic impacts provided in 9.3.2.5.					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
9.4.1	The proposed heat dissipation system for each potential alternative, as follows, is necessary: <ul style="list-style-type: none"> <li>- land-use requirements</li> <li>- water-use requirements</li> <li>- operating and maintenance experience for similar units</li> <li>- capital, maintenance, and operating costs</li> <li>- effect on generating efficiency</li> <li>- predicted thermal and physical effects, e.g., thermal plume and scouring</li> <li>- predicted atmospheric effects, e.g., fogging, icing, and drift</li> <li>- predicted operating noise levels</li> <li>- predicted aesthetic effect, e.g., visual plumes</li> <li>- predicted recreational benefits.</li> </ul>	Yes	Yes	NA	Note: In Section 9.4.1.2.6, the applicant acknowledges the closed cycle NDCTs are undersized for Units 3 & 4. Does this fact imply a needed permit condition to enforce ramp-down on hot summer days?					
9.4.1	The proposed heat dissipation system for each potential alternative, as follows, is necessary: <ul style="list-style-type: none"> <li>- land-use requirements</li> <li>- water-use requirements</li> <li>- operating and maintenance experience for similar units</li> <li>- capital, maintenance, and operating costs</li> <li>- effect on generating efficiency</li> <li>- predicted thermal and physical effects, e.g., thermal plume and scouring</li> <li>- predicted atmospheric effects, e.g., fogging, icing, and drift</li> <li>- predicted operating noise levels</li> <li>- predicted aesthetic effect, e.g., visual plumes</li> <li>- predicted recreational benefits.</li> </ul>	Yes	Yes	NA	Note: In Section 9.4.1.2.6, the applicant acknowledges the closed-cycle NDCTs are undersized for Units 3 & 4. Does this imply a needed permit condition – to enforce ramp-down on hot summer days?					
9.4.2	For intake systems, the following information is required: <ul style="list-style-type: none"> <li>- sketches or preliminary designs and operational characteristics of alternative intake systems, showing the intake design and its relationship to water surface, bottom geometry, shoreline, and discharge structure</li> <li>- alternative pumping facilities, if proposed</li> <li>- alternative locations of the proposed intake</li> </ul>	Yes	Yes	NA	Note: If the aquatic biologist finds the intake has a problem, we'll need to revisit the alternative system operation, which should reflect possible changes in operation due to the					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
	<p>system and pumping facility on the same water body</p> <ul style="list-style-type: none"> <li>- alternative procedures and schedules for intake defouling, including any use of defouling chemicals</li> <li>- descriptions and operational characteristics of any alternative trash racks, traveling screens, trash baskets, or fish return systems</li> <li>- predicted physical impacts from hydrologic alternatives and impacts to aquatic ecosystems, including entrapment, impingement, and entrainment, for each alternative intake system</li> <li>- capital, maintenance, and operating costs for each alternative intake system and costs associated with system adaptation to the proposed site.</li> </ul>				<p>state of the environment.</p> <p>If the proposed intakes result in significant impacts to aquatic ecosystems, we could revisit Alternatives 7 &amp; 8.</p>					
9.4.2	<p>For discharge systems, the following information is required:</p> <ul style="list-style-type: none"> <li>- sketches or preliminary designs and operational characteristics of alternative discharge systems showing the discharge design, its location with respect to the receiving water body, and its relationship to water surface, bottom geometry, intake structure, and shoreline</li> <li>- description of alternative discharge lines (or canals) from the heat dissipation system to the receiving water body</li> <li>- description of alternative locations of the proposed discharge system on the same water body</li> <li>- estimated physical impacts from hydrologic alterations and impacts to aquatic biota for each alternative discharge system</li> <li>- capital, maintenance, and operating costs for each alternative discharge system and costs associated with system adaptation to the proposed site.</li> </ul>	Yes	Yes	NA	<p>Note: No viable alternative to the existing system identified and evaluated.</p> <p>If the aquatic biologist finds the discharge is a problem, we'll need to revisit the alternative system operation, which should reflect possible changes in operation due to the state of the environment.</p> <p>An option of supplemental cooling (helper) towers could be considered but was not.</p>					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
9.4.2	For the water supply, the following information: – description of potential alternative sources of water and their availability, including location of water supply source with respect to the facility site – economic and environmental cost data for water delivered from each alternative source.	Yes	Yes	NA						
9.4.2	For water treatment, the following information is required: – description and purpose of alternative water treatment systems for the circulating water system and the facility (service) water system – chemicals and additives (or mechanical treatment) to be used in each alternative water treatment system – operating cycles for each alternative water treatment system – capital, maintenance, and operating costs for each alternative water treatment system.	Yes	Yes	NA						
9.4.2	Capital, maintenance, and operating costs for the proposed intake system, discharge system, and water treatment system, and water costs for the proposed water supply.	Yes	No	Yes – if the applicant has an estimate, and can provide it at the audit.	Will request at the site audit.  These costs projections, specific to Bellefonte and especially to the retro-fitting of existing structures, may be elsewhere in the ER; however, it will be good to review for retro-fitting cost estimates regarding the intake, towers, and discharge structures. These costs are not developed specifically for BLN in Section 10.4. Only				Yes	

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
					generic industry cost info is presented for a new plant.  Cost of managing sediment is not shown, e.g., dredging, or sediment removal from the raw water.					
9.4.2	For intake systems, the following information is required: <ul style="list-style-type: none"> <li>- sketches or preliminary designs and operational characteristics of alternative intake systems, showing the intake design and its relationship to water surface, bottom geometry, shoreline, and discharge structure</li> <li>- alternative pumping facilities, if proposed</li> <li>- alternative locations of the proposed intake system and pumping facility on the same water body</li> <li>- alternative procedures and schedules for intake defouling, including any use of defouling chemicals</li> <li>- descriptions and operational characteristics of any alternative trash racks, traveling screens, trash baskets, or fish return systems</li> <li>- predicted physical impacts from hydrologic alternatives and impacts to aquatic ecosystems, including entrapment, impingement, and entrainment, for each alternative intake system</li> <li>- capital, maintenance, and operating costs for each alternative intake system and costs associated with system adaptation to the proposed site.</li> </ul>	Yes	Yes	NA	Note: If the aquatic biologist finds the intake has a problem, we will need to revisit the alternative system operation, which should reflect possible changes in operation due to the state of the environment.  If the proposed intakes result in significant impacts to aquatic ecosystems, we could revisit Alternatives 7 & 8.					
9.4.2	For discharge systems, the following information is required: <ul style="list-style-type: none"> <li>- sketches or preliminary designs and operational characteristics of alternative discharge systems showing the discharge design, its location with respect to the</li> </ul>	Yes	Yes	NA	Note: No viable alternative to the existing system identified and evaluated.					

1. Issue Area/Topic (ESRP, Reg or RG Section)	Sufficiency Review Question  Is the following material found and cited in the Environmental Report, Site Safety Analysis Report, or Site Redress Plan?	Completeness and Technical Sufficiency Which Form Basis for Acceptability for Docketing				Changes to Planning Assumptions to be Considered in Development of Baseline Review Schedule			Review Dependencies Among Concurrent Reviews	
		2.	3.	4.	5.	7.	8.	9.	10.	11.
	<p>receiving water body, and its relationship to water surface, bottom geometry, intake structure, and shoreline</p> <ul style="list-style-type: none"> <li>- description of alternative discharge lines (or canals) from the heat dissipation system to the receiving water body</li> <li>- description of alternative locations of the proposed discharge system on the same water body</li> <li>- estimated physical impacts from hydrologic alterations and impacts to aquatic biota for each alternative discharge system</li> <li>- capital, maintenance, and operating costs for each alternative discharge system and costs associated with system adaptation to the proposed site.</li> </ul>				<p>If the aquatic biologist finds the discharge is a problem, we will need to revisit the alternative system operation, which should reflect possible changes in operation due to the state of the environment.</p> <p>An option of supplemental cooling (helper) towers could be considered but was not.</p>					
9.4.2	<p>For the water supply, the following information:</p> <ul style="list-style-type: none"> <li>- description of potential alternative sources of water and their availability, including location of water supply source with respect to the facility site</li> <li>- economic and environmental cost data for water delivered from each alternative source.</li> </ul>	Yes	Yes	NA						
9.4.2	<p>For water treatment, the following information is required:</p> <ul style="list-style-type: none"> <li>- description and purpose of alternative water treatment systems for the circulating water system and the facility (service) water system</li> <li>- chemicals and additives (or mechanical treatment) to be used in each alternative water treatment system</li> <li>- operating cycles for each alternative water treatment system</li> <li>- capital, maintenance, and operating costs for each alternative water treatment system.</li> </ul>	Yes	Yes	NA						

1. Issue Area/Topic (ESRP, Reg or RG Section)	Sufficiency Review Question  Is the following material found and cited in the Environmental Report, Site Safety Analysis Report, or Site Redress Plan?	Completeness and Technical Sufficiency Which Form Basis for Acceptability for Docketing				Changes to Planning Assumptions to be Considered in Development of Baseline Review Schedule			Review Dependencies Among Concurrent Reviews	
		2.	3.	4.	5.	7.	8.	9.	10.	11.
9.4.2	Capital, maintenance, and operating costs for the proposed intake system, discharge system, and water treatment system, and water costs for the proposed water supply.	Yes	No	Yes – if they have made an estimate, and can provide at the audit.	Will request at the site audit.  These costs projections, specific to Bellefonte and especially to the retro-fitting of existing structures, are likely elsewhere in the ER; however, it will be good to review for retro-fitting cost estimates regarding the intake, towers, and discharge structures. These costs are not developed specifically for BLN in Section 10.4. Only generic industry cost information is presented for a new plant.  Cost of managing sediment is not shown, e.g., dredging, or sediment removal from the raw water.				Yes	
9.4.3	For alternative transmission corridor routes: – maps or aerial photographs showing alternative transmission corridors from the station site to interconnecting points on the existing high voltage system and identifying corridor characteristics (e.g., new lines/towers on existing corridors, widening of existing corridors, and new corridors). – maps or aerial photographs showing existing	NA* <sup>1</sup>	NA*	NA*	ESRP 9.4.3 covers review of the applicant’s proposed transmission system. The scope of the review includes alternative corridor routes and alternatives to proposed system					

<sup>1</sup> NA\* indicates that during the South Texas Acceptance Review it was determined that this subject was Not Applicable (this typically means it is not priority in revised ESRP); however, as it is still in the ESRP and for my own notes, I am including some detail.

1. Issue Area/Topic (ESRP, Reg or RG Section)	Sufficiency Review Question  Is the following material found and cited in the Environmental Report, Site Safety Analysis Report, or Site Redress Plan?	Completeness and Technical Sufficiency Which Form Basis for Acceptability for Docketing				Changes to Planning Assumptions to be Considered in Development of Baseline Review Schedule			Review Dependencies Among Concurrent Reviews	
		2.	3.	4.	5.	7.	8.	9.	10.	11.
	<p>and known future generating stations and transmission networks for the service area or affected region. For existing transmission corridors not proposed as alternatives to the proposed system, reasons why they were not considered (e.g., system reliability) should be provided.</p> <ul style="list-style-type: none"> <li>- lengths and widths of corridors for each alternative segment or corridor.</li> <li>- number and approximate location of known historic/archaeological sites within 2 km of the alternative corridor.</li> <li>- maps or aerial photographs showing the approximate locations of Federal, State, or private wildlife refuges or other areas dedicated to ecological preservation, management, or study that are within 1 km of alternative corridors.</li> <li>- corridor proximity to airports, roads, railroads, or other transportation facilities.</li> <li>- general land-use characteristics along the alternative corridors, expressed as percentages of total corridor length and in terms of the intensity of use (e.g., residential density) for the following classifications: <ul style="list-style-type: none"> <li>• agricultural</li> <li>• forest, woodland</li> <li>• rangeland</li> <li>• recreational or ecologically sensitive areas such as parks, wildlife preserves/ refuges or management areas, wetlands, wild and scenic rivers</li> <li>• urban or residential areas</li> <li>• commercial or industrial areas</li> <li>• other potentially significant classifications (e.g., Federally owned lands, Native American tribal lands, ethnic enclaves, or areas of high minority population)</li> <li>• potential geologic hazards (e.g., active faults) that could affect transmission system reliability.</li> </ul> </li> </ul>				design, construction, and maintenance practices. In recent revisions of the ESRP, the staff proposed that ESRP 9.4.3 be eliminated from NUREG-1555 for the following reasons: 1) the LWA rule [10 CFR 50.10(a)(2)(vii) and 51.4] has defined transmission line construction to be a non-construction activity for purposes of NRC's regulations; 2) the impacts of transmission line routing typically receive extensive review at the state level; 3) new transmission lines will often not be constructed by the entity submitting the application to NRC, 4) NRC has limited experience and expertise in the subject areas covered by ESRP 9.4.3, and 5) ESRP 9.4.3 was not used during preparation of the EISs for the initial four ESP applications.					



1. Issue Area/Topic (ESRP, Reg or RG Section)	Sufficiency Review Question  Is the following material found and cited in the Environmental Report, Site Safety Analysis Report, or Site Redress Plan?	Completeness and Technical Sufficiency Which Form Basis for Acceptability for Docketing				Changes to Planning Assumptions to be Considered in Development of Baseline Review Schedule			Review Dependencies Among Concurrent Reviews	
		2.	3.	4.	5.	7.	8.	9.	10.	11.
9.4.3	<p>For alternative system design, construction, and maintenance practices, the following information:</p> <ul style="list-style-type: none"> <li>- alternative voltage levels and transmission frequency that are compatible with the existing service area/regional transmission network</li> <li>- alternative tower designs for areas of potential visual impact</li> <li>- alternative tower heights and conductor-to-ground clearances</li> <li>- alternative conductor designs</li> <li>- underground placement in areas of potentially high impact</li> <li>- alternative construction practices, including vegetation clearing; erosion control; revegetation; access road design, location, and maintenance; tower placement, foundations, and installation; and conductor installation</li> <li>- alternative maintenance practices</li> <li>- alternative location of auxiliary transmission facilities, e.g., substations, microwave relay stations.</li> </ul>	NA* <sup>1</sup>	NA*	NA*	ESRP 9.4.3 covers review of the applicant's proposed transmission system. The scope of the review includes alternative corridor routes and alternatives to proposed system design, construction, and maintenance practices. In recent revisions of the ESRP, the staff proposed that ESRP 9.4.3 be eliminated from NUREG-1555 for the following reasons: 1) the LWA rule [10 CFR 50.10(a)(2)(vii) and 51.4] has defined transmission line construction to be a non-construction activity for purposes of NRC's regulations; 2) the impacts of transmission line routing typically receive extensive review at the state level; 3) new transmission lines will often not be constructed by the entity submitting the application to NRC, 4) NRC has limited					

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1. Issue Area/Topic (ESRP, Reg or RG Section)	Sufficiency Review Question Is the following material found and cited in the Environmental Report, Site Safety Analysis Report, or Site Redress Plan?	Completeness and Technical Sufficiency Which Form Basis for Acceptability for Docketing				Changes to Planning Assumptions to be Considered in Development of Baseline Review Schedule			Review Dependencies Among Concurrent Reviews	
		2.	3.	4.	5.	7.	8.	9.	10.	11.
					experience and expertise in the subject areas covered by ESRP 9.4.3, and 5) ESRP 9.4.3 was not used during preparation of the EISs for the initial four ESP applications.					
9.4.3	For the alternative transmission selection process and cost data, the following information is required: <ul style="list-style-type: none"> <li>- discussion of the selection process used to evaluate transmission line routes and the rationale and criteria used to select the proposed route</li> <li>- acquisition cost data for the proposed and alternative route corridors</li> <li>- construction and maintenance costs for the proposed system and for principal system alternatives</li> <li>- estimated transmission line losses for the proposed system and for principal alternatives.</li> </ul>	NA* <sup>1</sup>	NA*	NA*	ESRP 9.4.3 covers review of the applicant's proposed transmission system. The scope of the review includes alternative corridor routes and alternatives to proposed system design, construction, and maintenance practices. In recent revisions of the ESRP, the staff proposed that ESRP 9.4.3 be eliminated from NUREG-1555 for the following reasons: 1) the LWA rule [10 CFR 50.10(a)(2)(vii) and 51.4] has defined transmission line construction to be a non-construction activity for purposes of NRC's regulations; 2) the impacts of transmission line					

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1. Issue Area/Topic (ESRP, Reg or RG Section)	Sufficiency Review Question  Is the following material found and cited in the Environmental Report, Site Safety Analysis Report, or Site Redress Plan?	Completeness and Technical Sufficiency Which Form Basis for Acceptability for Docketing				Changes to Planning Assumptions to be Considered in Development of Baseline Review Schedule			Review Dependencies Among Concurrent Reviews	
		2.	3.	4.	5.	7.	8.	9.	10.	11.
					routing typically receive extensive review at the state level; 3) new transmission lines will often not be constructed by the entity submitting the application to NRC, 4) NRC has limited experience and expertise in the subject areas covered by ESRP 9.4.3, and 5) ESRP 9.4.3 was not used during preparation of the EISs for the initial four ESP applications.					
9.4.3	Transmission Alternatives	NA* <sup>1</sup>	NA*	NA*	ESRP 9.4.3 covers review of the applicant's proposed transmission system. The scope of the review includes alternative corridor routes and alternatives to proposed system design, construction, and maintenance practices. In recent revisions of the ESRP, the staff proposed that ESRP 9.4.3 be eliminated from NUREG-1555 for the following reasons: 1) the LWA					

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1. Issue Area/Topic (ESRP, Reg or RG Section)	Sufficiency Review Question  Is the following material found and cited in the Environmental Report, Site Safety Analysis Report, or Site Redress Plan?	Completeness and Technical Sufficiency Which Form Basis for Acceptability for Docketing				Changes to Planning Assumptions to be Considered in Development of Baseline Review Schedule			Review Dependencies Among Concurrent Reviews	
		2.	3.	4.	5.	7.	8.	9.	10.	11.
					rule [10 CFR 50.10(a)(2)(vii) and 51.4] has defined transmission line construction to be a non-construction activity for purposes of NRC's regula- tions; 2) the impacts of transmission line routing typically receive extensive review at the state level; 3) new transmission lines will often not be constructed by the entity submitting the application to NRC, 4) NRC has limited experience and expertise in the subject areas covered by ESRP 9.4.3, and 5) ESRP 9.4.3 was not used during preparation of the EISs for the initial four ESP applications.					
10.1	Unavoidable Adverse Environmental Impacts: The predicted adverse environmental impacts of plant or project construction and operation that can not be avoided and for which no practical means of mitigation are available. Impacts to be tabulated, organized by environmental category, and summarized by nature and magnitude of each category.	Yes	Yes	NA						
10.1 10 CFR 51.45	Unavoidable Adverse Environmental Impacts	Yes	Yes	NA						
10.2	Irreversible and Irretrievable Commitments of Resources: Predicted irreversible and irretrievable commitments of resources involved	Yes	Yes	NA						

1. Issue Area/Topic (ESRP, Reg or RG Section)	Sufficiency Review Question  Is the following material found and cited in the Environmental Report, Site Safety Analysis Report, or Site Redress Plan?	Completeness and Technical Sufficiency Which Form Basis for Acceptability for Docketing				Changes to Planning Assumptions to be Considered in Development of Baseline Review Schedule			Review Dependencies Among Concurrent Reviews	
		2.	3.	4.	5.	7.	8.	9.	10.	11.
	in project construction and operation that can not be avoided by practical means. Includes (1) tabulation of irreversible environmental resource commitments, (2) tabulation of all irretrievable materials used in plant construction and operation, (3) organization of these commitments by category, and (4) summary by nature and magnitude of each category.									
10.2 10 CFR 51.45	Irreversible and Irretrievable Commitments of Resources	Yes	Yes	NA						
10.3	Relationship between Short-Term Uses and Long-Term Productivity of the Human Environ- ment: Description of proposed project's local short-term use of the environment and the effects of uses on long-term environmental productivity. Includes predicted unavoidable adverse environ- mental impacts (or environmental benefits) of construction and operation, and predicted long- term environmental impacts (or benefits) resulting from plant construction and operation. This section to include evaluation of the extent to which the proposed project's use of the environment will preclude any options for other future use of the environment. To be based on both the unavoidable adverse environmental impacts, and the irreversible and irretrievable commitments of resources described earlier in Section 10.	Yes	Yes	NA						
10.3 10 CFR 51.45	Relationship Between Short-Term Uses and Long-Term Productivity of the Human Environment	Yes	Yes	NA						
10.4.1	The annual average electrical-energy generation (kW-hr) and the annual production of any other beneficial or revenue-producing products. [ESRP 3.2]	Yes	Yes	NA						
10.4.1	Data on other benefits, quantified to the extent possible (e.g., annual local, State, and Federal tax payments, number and type of jobs, and total annual wages paid). [ESRPs 4.4.2, 5.8.2]	Yes	No	Yes	4.4.2.2 and 5.8.2.2.1 Not addressed adequately				No	Socioeconomics 2.5.1.3, 4.4.2.2 and 5.8.2.2.1, though this is not referenced in Chapter 8

1. Issue Area/Topic (ESRP, Reg or RG Section)	Sufficiency Review Question Is the following material found and cited in the Environmental Report, Site Safety Analysis Report, or Site Redress Plan?	Completeness and Technical Sufficiency Which Form Basis for Acceptability for Docketing				Changes to Planning Assumptions to be Considered in Development of Baseline Review Schedule			Review Dependencies Among Concurrent Reviews	
		2.	3.	4.	5.	7.	8.	9.	10.	11.
10.4.1	Description of other nonquantifiable or nonmonetary benefits (e.g., new recreational facilities). [ESRPs 4.1.1 through 5.8.3]	Yes	No	Yes	4.4.2.2 and 5.8 2.2.1 Not addressed with adequate specificity,				No	Socioeconomics 2.5.1.3, 4.4.2.2 and 5.8.2.2.1, though this is not referenced in Chapter 8
10.4.1	Description of differences in benefits between alternatives and system configurations. [ESRPs 9.4.1, 9.4.2, 9.4.3]	Yes								
10.4.2	Estimates of the capital cost, annual operating and maintenance costs, decommissioning costs, and any other internal costs of the proposed facility, including alternative modifications. [ESRP 9.4.1, 9.4.2, 9.4.3]	Yes	No	Yes	9.3.3.4 presents only relative ratings, no actual quantitative measures				No	Chapter 9.3.3.4 and 4.4.2.2 and 5.8.2.2.1 should all be consistent.
10.4.2	Description of differences in costs between alternatives and alternative system configurations. [ESRPs 9.4.1, 9.4.2, 9.4.3]	Yes	No	Maybe – I'm not exactly clear how much specificity is needed	9.3.3.4 presents only relative ratings, no actual quantitative measures	Maybe			No	This information is now in Chapter 9, not in Chapter 8. Needs to be linked to 1.1 and 4.4.2.2 and 5.8.2.2.1, none of which have specific information about costs or purchases
10.4.2	Comparison of the estimated costs of the proposed facility with other independent or applicant-commissioned cost estimates and reasons for significant differences.	No	No	Maybe	There are no actual cost data presented in any section, but Chapter 9 does include qualitative cost comparisons. However, it does not present any other independent data.	Maybe			No	Should link to Chapter 9.
Cumulative Impacts (No ESRP Section)	Has the applicant identified the activities of other agencies that have occurred/will occur in the potential impact area that may contribute to a cumulative impact on terrestrial or aquatic resources?	Yes	No	Yes	Management activities on Mud Creek WMA, Bellefonte Island, Coon Gulf, and Section Bluff may impact regional					

1. Issue Area/Topic (ESRP, Reg or RG Section)	Sufficiency Review Question  Is the following material found and cited in the Environmental Report, Site Safety Analysis Report, or Site Redress Plan?	Completeness and Technical Sufficiency Which Form Basis for Acceptability for Docketing				Changes to Planning Assumptions to be Considered in Development of Baseline Review Schedule			Review Dependencies Among Concurrent Reviews	
		2.	3.	4.	5.	7.	8.	9.	10.	11.
					resources; no discussion on potential impacts (+ or -)					
Cumulative Impacts (No ESRP Section)	Has the applicant identified projects in the region that may contribute to a cumulative impact on “important species” or habitat?	Yes	No	Yes	Impacts of regional land management trends (agriculture, development, etc.) to loss of important habitats (wetlands, forest) not discussed.					
Cumulative Impacts (No ESRP Section)	Has the applicant identified the activities of other agencies that have occurred/will occur in the potential impact area that may contribute to a cumulative impact on terrestrial or aquatic resources?	No	No	Yes	No identification of activities of other agencies was identified.					
Cumulative Impacts (No ESRP Section)	Has the applicant identified projects in the region that may contribute to a cumulative impact on “important species” or habitat?	No	No	Yes	5.3.1.2.1 refers to Widows Creek Fossil Plant but no other projects were identified and the impacts to important species were not explicitly discussed.					
RG 4.2, Rev. 2: Page 5-1	Assess the proposed action for cumulative and projected long-term effects from the point of view that each generation is trustee of the environment for each succeeding generation.	Yes	Yes	NA						
RG 4.2, Rev. 2: Page 5-3	Information concerning any cumulative buildup of radionuclides in the environment, such as in sediments.	Yes	Yes	NA						

**Table 1. Bellefonte Information Needs**

1. Issue Area/Topic (ESRP, Reg or RG Section)	Sufficiency Review Question  Is the following material found and cited in the Environmental Report, Site Safety Analysis Report, or Site Redress Plan?	Completeness and Technical Sufficiency Which Form Basis for Acceptability for Docketing				Changes to Planning Assumptions to be Considered in Development of Baseline Review Schedule			Review Dependencies Among Concurrent Reviews	
		2. Does the ER address the items required by regulation (refer to 10 CFR 52.80(b) and RG 4.2? (Completeness) (Yes/No)	3. Is ER issue area technically sufficient for this review area/topic? (Sufficiency) (Yes/No)	4. Can the technical deficiency be resolved through the RAI process or at the site audit? (Yes/No)	5. If no, for either completeness or technical sufficiency, identify deficiency(ies) and provide details. Note specific section in the ER applicable to the deficiency.	7. Are the pre-baseline review schedule and estimated staff-hours appropriate for the issue area? (Yes/No) Answer yes if 2, 3, and 4 are yes. No, if 4 is no.	8. For each no, identify the change (or basis for change). (If able to estimate the impact, labor effort, or schedule delay, provide estimate. Otherwise leave blank.)	9. Identify the total review time in staff-hours. (Leave blank.)	10. Can the review of the issue area be completed without the completion of a concurrent review? (Is the section technically bound to another ESRP section?) (Yes/No)	11. For each no, identify which issue area section. Provide the ESRP section number and title impacted by the noted deficiency.
1.1	The nature of the proposed action and the constraints that are placed on the review because of the type of action.	Yes	No	Yes	The constraints placed on the review because of the type of action are not listed.					
1.2	The date of application/initiation and scheduled date of issuance of each authorization.	Yes	No	Yes	The dates of initiation and issuance of authorizations are not included.					
2.1	Site location: State; county; latitude and longitude Universal Transverse Mercator (UTM) coordinates; and township, range, and section(s).	Yes	No	Yes	Township and Range not included.					
2.2.2	Land use within the transmission corridors using the categories defined by the U.S. Geological Survey. Land-use information should be subdivided into corridor segments having predominantly similar land-use types (from consultation with applicable Federal, State, regional, local, and affected Native American tribal agencies).	Yes	No	Yes	As the applicant is proposing to use existing corridors, land-use specifics are less important; however, it may be necessary to obtain further descriptions of these corridors with regard to terrestrial and cultural issues. Section 3.7 refers to surveys completed on topic during original application, but no details are provided.					



1. Issue Area/Topic (ESRP, Reg or RG Section)	Sufficiency Review Question Is the following material found and cited in the Environmental Report, Site Safety Analysis Report, or Site Redress Plan?	Completeness and Technical Sufficiency Which Form Basis for Acceptability for Docketing				Changes to Planning Assumptions to be Considered in Development of Baseline Review Schedule			Review Dependencies Among Concurrent Reviews	
		2.	3.	4.	5.	7.	8.	9.	10.	11.
2.3.1 (lakes and impoundments only)	<ul style="list-style-type: none"> <li>- a description of lake or impoundment</li> <li>- where influenced by the intake or discharge structures, or vice versa, size, location, and elevation of outlets</li> <li>- a summary description of reservoir operating rules</li> <li>- annual yield and dependability</li> <li>- variations in inflows, outflows, water surface elevations, and storage volumes and retention time</li> <li>- net loss, including evaporation and seepage</li> <li>- current patterns, including frequency distributions of current speed, direction, and persistence</li> <li>- temperature distribution (horizontal and vertical) and stratification and seasonal variations of density-induced currents</li> <li>- detailed bathymetry in vicinity of station intake and outfall</li> </ul>	Yes	No	Yes	Note: Detailed bathymetry data base may not be present in the references. The color shaded and contoured map (Section 2.3.1.2.5, Figure 2.3-9) may not be sufficient, and a data base of the bathymetry data may be required to support analyses and the creation of maps and figures in the EIS.				No	5.3 Cooling System Impacts
2.3.2	<p>Quantitative description of present and known future surface-water uses (withdrawals, consumptions, and returns) that are within the hydrological system in which the site is located and that may affect or be affected by the plant. This should include a quantitative description of any water uses that provide potential liquid pathways for both radiological and nonradiological effluents. The following should be included for each withdrawal or discharge:</p> <ul style="list-style-type: none"> <li>- locations of diversions and returns with respect to the site and the water body (from the site visit, the general literature, and consultation with Federal, State, regional, local, and affected Native American tribal agencies)</li> <li>- identification of the water body (from the ER and the general literature)</li> <li>- the average monthly withdrawal and return rate for each diversion by use category</li> </ul>	Yes	No	Yes	<p>Average monthly return rates for each diversion by use category do not appear in the supporting table (i.e., Section 2.3.2.2, Table 2.3-28).</p> <p>Table 2.3-31 showing local surface water users omits distance and location information per 10 CFR 2.390(a)(3). This table does not address low volume domestic users adjacent to Towne Creek.</p> <p>In Section 2.3.2.4, the applicant states</p>				Yes	

1. Issue Area/Topic (ESRP, Reg or RG Section)	Sufficiency Review Question  Is the following material found and cited in the Environmental Report, Site Safety Analysis Report, or Site Redress Plan?	Completeness and Technical Sufficiency Which Form Basis for Acceptability for Docketing				Changes to Planning Assumptions to be Considered in Development of Baseline Review Schedule			Review Dependencies Among Concurrent Reviews	
		2.	3.	4.	5.	7.	8.	9.	10.	11.
					that the potential construction and operation of Units 3 and 4 was not considered in the future forecast. During the site audit, need to learn more about their forecast process, and if other nuclear facilities were included, e.g., BFN, WBN).					
2.3.2	Quantitative and qualitative description of recreational, navigational, instream, and other nonconsumptive present and known future water uses. For a 10-km (6-mi) radius, this should include the following (from the ER, site visit, peer-reviewed technical literature, and consultation with Federal, State, regional, local, and affected Native American tribal agencies): <ul style="list-style-type: none"> <li>- identification of water bodies and locations with respect to the site (maps may be useful)</li> <li>- the kind and location of activity on the water body (maps may be useful)</li> <li>- the use rate with time variation.</li> </ul>	Yes	No	Yes, or likely	The applicant states in Section 2.3.2.2 that “Quantitative estimates for instream water use within the Tennessee River Basin watershed have not been completed to date.”	Depends on acceptance of qualitative statements by socio-economics and aquatic ecology.			No	Sections on socio-economics and aquatic biology.
2.4.1	Has the applicant identified the species and habitats that will be considered “important” ecological resources of the site, vicinity, transmission corridors, and offsite areas for evaluation of potential impacts on them? Did the applicant include a map that identifies “important” terrestrial habitats on and in the vicinity of the site?	Yes	No	Yes	Figures depicting habitats and other spatial data are difficult to discern in black-and-white format.					
2.4.1	Did the applicant describe any “important” species and their spatial and temporal distributions on and in the vicinity of the site, including, as appropriate, their relative abundance, critical habitat, and their life histories—critical life stages, biologically significant activities, seasonal habitat requirements and population fluctuations, food chain, and other interspecific relationships?	Yes	No	Yes	Information on bat distribution insufficient (i.e., manmade structures). Location of suitable habitat for important species (bats, plants), both in and out of the proposed construction zone, not spatially explicit.					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
2.4.1	Did the applicant describe the location of any ecological or biological studies of the site or its environs that are recent or currently in progress?	Yes	No	Yes	Are there any studies being conducted in special management areas nearby (Mud Creek, Coon Gulf, etc.)?					
2.4.1	Did the applicant identify any important waterfowl areas in the proposed transmission lines cross, a list of descriptions of these areas and data on the local abundance and distribution of waterfowl, their seasonal status, and local flight patterns?	Yes	No	Yes	Although it was determined Alabama is between flyways, waterfowl species are listed as occurring on the site and habitats are present but not sufficiently described.					
2.4.1	Is the available site-specific data adequate, accurate, and complete?	Yes	No	Yes	If proper and valid surveys for important species are not conducted, case must be very strong why they were not or are not needed. Habitat types of important species (plants, bats) appear to exist on the site and within the impact zone, and USFWS recom- mended surveys during flowering/ fruiting, yet winter surveys were conducted. No evidence of USFWS approval of winter survey as stated in Section 2.4.1.4.1 unless this is when plants are flowering or fruiting.					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
2.4.2	Has the applicant identified the species and habitats that will be considered “important” ecological resources of the site, vicinity, transmission corridors, and offsite areas for evaluation of potential impacts on them? Did the applicant include a map that identifies “important” aquatic habitats or bodies of water on and in the vicinity of the site?	Yes	No	Yes	2.4.2.5.3 No identification of presence or absence of “Commercial fishery” or type of such fishery					
2.4.2	Did the applicant describe any “important” species and their spatial and temporal distributions on and in the vicinity of the site (discharge area and receiving water body), including, as appropriate, their relative abundance, critical habitat, and their life histories—critical life stages, spawning areas, nursery grounds, food habits, feeding areas, wintering areas, migration areas?	Yes	No	Yes	2.4.2 Described important species. Some spatial and temporal data on the listed species. Referenced surveys on two species but did not include maps or info other than “adjacent to the BLN”. 2.4.2.5.3 No information on commercial fishery or absence of commercial fishery.					
2.4.2	Did the applicant identify and describe the species composition, the spatial and temporal distribution, abundance, and other structural and functional attributes of biotic assemblages that could be impacted by the proposed action?	Yes	No	Yes	2.4.2.1 Species composition. Not much information on intake canal or on Town Creek Embayment beyond “Aquatic communities have been extensively studied” and “productive ecosystem and is characterized by diverse aquatic fauna and flora.”  2.4.2.4 For river, the assumption is made that the fish community is					

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					substantially similar from TRM 375.2 to TRM 424.0. But that data is not in the ER. Habitat and life histories described in general by Family – not specifics by species.  2.4.2.1.3 Onsite ponds – “Other populations migrated from surrounding areas and are there- fore, not considered rare or unique to the onsite pond habitats”. There is no data, such as species lists to back this statement.					
2.4.2	Did the applicant list species that are of concern as disease vectors or pests? Did the applicant list any nuisance or invasive species of concern (e.g., <i>Corbicula</i> sp. or <i>Mytilus</i> sp.)? These species are capable of blocking or bio-fouling the cooling water intake system or can cause other significant problems.	Yes	No	Yes	2.4.2.5.4 Will need clarifying information and data from the April 2007 survey.					
2.4.2	Did the applicant describe the location of any ecological or biological studies of the site or its environs that are recent or currently in progress?	Yes	No	Yes	2.4.2.4 Location of studies only generally described. Refer- ences are not cited. Data from study is too high level for an adequate review (species identified based on year, rather than number of individuals, locations of sampling etc. We will need references to the studies and data presented to					

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					show the results based on sampling location; sampling gear, techniques; sampling times, number of individuals, etc., then the review can be completed in given amount of time.					
2.4.2	Is the available site-specific data adequate, accurate, and complete?	Yes	No	Yes	2.4.2.4 Site-specific data is not provided or referenced. Studies are mentioned. If data is available then RAIs will be adequate to resolve this issue.					
2.5.2	Information related to the area's economic base, including: <ul style="list-style-type: none"> <li>- important regional industry by category, including employment</li> <li>- size and description of the heavy construction industry and construction labor force within the region</li> <li>- total regional labor force</li> <li>- regional unemployment levels and future economic outlook</li> <li>- characterization of incremental onsite labor, peak number of workers and duration of the peak, the number of workers expected to commute daily, the number of workers expected to require temporary and permanent housing, and the inventory of rental and of permanent housing within 80 km of the site.</li> </ul>	Yes	No	Maybe	Need detailed workforce information and regional expenditure information. Although the assumptions are quite conservative, they are not presented within an adequate framework, and there are no references supporting the basis for many assumptions. A referenceable source for this information is needed.	Maybe			No	Section 8 Need for Power
2.5.2	Social-structure information, including major community structures.	No	No	Yes						
2.5.2	Regional tax structure and distribution of the present revenues to each jurisdiction and district.	Yes	No	Yes	Need information for the rest of the counties in the impact area.				No	Chapter 8, cost benefit; and Chapter 9, comparison of alternatives

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2.5.2	Information on highways and transportation systems, for example: – regional and local highway systems, including carrying capacity and condition of roads and highways – availability and type of public transportation – modifications that might affect traffic flow to and from the station site.	Yes	No	Yes	Trend data and peak flow data is not presented.  A referenceable source for this information is needed.				No	Chapter 7?
2.5.3	A detailed description of any archaeological or historical surveys of the proposed site, transmission line routes, or access corridors, including the physical extent of the survey, including why areas were not surveyed; techniques used; qualification so the surveyor; and findings.	Yes	No	Yes	Details of cultural resources surveys for the transmission lines are not clear (2.5.3).					
2.5.3	Comments of any organizations contacted by the applicant to locate and assess archaeological and historic resources located on or near the proposed station site.	Yes	No	Yes	Only the Alabama SHPO and affected Tribes in the region were contacted. More effort to contact historical organizations or family members who may continue to visit the two historic cemeteries located in closed proximity to the BLN site may be warranted (2.5.3, 4.1.3, and 5.1.3)					
2.5.3	A description of cultural resources within the proposed site, proposed transmission line routes, or access corridors, and offsite areas that are in or eligible for inclusion in the National Register or are included in State or local registers or inventories of historic and archaeological resources.	Yes	No	Yes	Details regarding cultural resources located within transmission line corridors are not clear (2.5.3, 4.1.3 and 5.1.3).					
2.5.3	A list of organizations and individuals contacted by the applicant also provided significant information concerning the location of cultural and historical properties.	Yes	No	Yes	Only the Alabama SHPO and affected Tribes in the region were contacted. More effort to					

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					contact historical organizations or family members who may continue to visit the two historic cemeteries located in closed proximity to the BLN site may be warranted (2.5.3, 4.1.3, and 5.1.3)					
2.5.4	Comments of any organizations contacted by the applicant that locate and assess uniquely vulnerable minority and low-income communities located on or near the proposed station site.	No	No	Yes	Provide information on organizations contacted in Section 2.5.4					
2.5.4	More specific description of any unique minority or low-income communities within each environmental-impact area that are likely to be disproportionately affected by the proposed project construction or operation.	Yes	No	Yes	Not clear that analysis was adequate. There may be populations that need to be examined more carefully.					
2.7	Monthly and annual air temperature and dewpoint temperature summaries, including averages, extremes, and diurnal range.	Yes	No	Yes	Dewpoint temperature summary information not included					
2.8	The ER or SSAR/FSAR should provide some indication of other nearby industrial facilities, other nuclear facilities in the region, or other Federal projects existing in the region or that might be required to construct and operate the proposed facility.	Yes	No	Yes	Nearby industrial facilities and other nuclear facilities in the region are not listed.					
3.1	Topographic maps of the site and vicinity (refer to ESRP 2.2) showing facility and station layout, the exclusion area, site boundary, liquid and gaseous release points (and their elevations), meteorological towers, the construction zone, land to be cleared, waste disposal areas, and other buildings and structures (both temporary and permanent) associated with the project.	Yes	No	Yes	A topographic map is provided, along with some other figures, but these lack some of the required detail, i.e., liquid and gaseous release points (elevations of gaseous release points are given in the text), meteorological towers.					



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3.1	Description of the station, including proposed plans to seclude and screen the facilities and to architecturally integrate the buildings and landscaping into the environs.	Yes	No	Yes	The ER does not address plans to seclude and screen the facility.					
3.1	An architectural rendering of the proposed project to include landscaping and all major station features.	Yes	No	Yes	The ER does not address landscaping plans.					
3.6.3	Applicable Federal, State, and tribal regional standards concerning atmospheric emissions from consultation with Federal, State, regional, local, and affected Native American tribal agencies.	Yes	No	Yes	No discussion of applicable Federal, State, and tribal regional standards concerning atmospheric emissions in Section 3.6.3 or referenced sections.					
3.6.3	The following list of data should be obtained: <ul style="list-style-type: none"> <li>- estimates of gaseous effluents (e.g., from diesel engines, gas turbines, heating plants, incinerators) released during plant operation, the location and elevation of release points, the frequency of their release and their treatment before release, and the total quantity of SOx, NOx, hydrocarbons, and suspended particulates to be discharged annually</li> <li>- applicable Federal, State, and tribal regional standards concerning atmospheric emissions from consultation with Federal, State, regional, local, and affected Native American tribal agencies</li> <li>- information concerning nonradioactive wastes not considered in ESRPs 3.6.1 and 3.6.2. Examples include laboratory wastes, storm drainage, trash, hazardous wastes, and debris from bars or screens on the cooling water intake. The description should include estimates of the quantities of wastes, their pollutant concentrations at points of release as appropriate to the system, and other relevant data</li> <li>- procedures for any offsite disposal of wastes</li> <li>- procedures by which all effluents will be</li> </ul>	Yes	No	Yes	No discussion of applicable Federal, State, and tribal regional standards concerning atmospheric emissions in Section 3.6.3 or referenced sections.  Notes: In Section 3.6.3.3, concerning non-radioactive wastes not considered in ESRPs 3.6.1 and 3.6.2 – no estimates of quantities by the applicant.  For this applicant, the listing of procedures appears to mean a commitment to use off-site licensed/ permitted facilities.					

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	treated, controlled, and discharged to meet State and EPA effluent limitation guidelines and new source performance standards									
3.8	If the proposed reactor and fuel designs and operations do not meet all the conditions in 10 CFR 51.52(a)(1) through (a)(5), does the applicant provide an analysis of the environmental impacts of transportation of fuel and waste to and from the reactor with respect to normal conditions of transport and possible accidents (10 CFR 51.51(a)(6))?	No	No	Yes	The analysis in Sec 3.8 incorrectly assumes NRC has approved higher enrichments and burnup levels for advanced reactors and cites NUREG-1437 and NUREG-1555 as basis.					
3.8	Does the applicant estimate the heat load in a spent fuel shipping cask and compare the result to 10 CFR 51.52 Table S-4 conditions (i.e., 225,000 Btu/hr (~66 kW))?	No	No	Yes	Quantitative information on SNF shipment heat load is not provided in Sections 5.11 or 7.4 of the ER					
3.8	Does the applicant estimate the radiation dose to transport workers and compare the result to the Table S-4 condition (i.e., individual radiation doses in the range from 0.01 to 300 millirem per reactor year, population doses are 4 person-rem per reactor year)?	No	No	Yes	A full and detailed analysis of transportation impacts is not provided as required by 10 CFR 51.52(b)					
3.8	Does the applicant calculate routine radiation doses to the general public - onlookers and compare the results to the Table S-4 conditions (i.e., routine radiation doses to onlookers – individual radiation doses in the range 0.003 to 1.3 millirem per reactor-year and population doses 3 person-rem per reactor year)?	No	No	Yes	A full and detailed analysis of transportation impacts is not provided as required by 10 CFR 51.52(b)					
3.8	Does the applicant calculate routine radiation doses to the general public along the route and compare the results to Table S-4 conditions (i.e., individual radiation doses in the range 0.0001 to 0.06 millirem per reactor year and population doses 3 person-rem per reactor year (includes doses to onlookers).	No	No	Yes	A full and detailed analysis of transportation impacts is not provided as required by 10 CFR 51.52(b)					

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3.8	Does the applicant demonstrate that the radiological effects of accidents are SMALL as stated in Table S-4?	No	No	Yes	A full and detailed analysis of transportation impacts is not provided as required by 10 CFR 51.52(b)					
3.8	Does the applicant estimate the non-radiological impacts of accidents and compare the results to Table S-4 condition (i.e., non-radiological accidents result in one fatal injury per 100 reactor years, 1 non-fatal injury in 10 reactor years, and \$475 in property damage per year)?	No	No	Yes	A full and detailed analysis of transportation impacts is not provided as required by 10 CFR 51.52(b)					
4.1.1	Will local roads or highways need reconditioning to handle the expected loads?	Yes	No	Yes	4.4.1.3 expects roads adequate to handle construction activities, but 4.1.1.1 indicates that the construction of new roads, both temporary and permanent, are planned, but provides no additional detail.					
4.1.3	A description and National Register evaluation of cultural resources within 15 km (9 mi) of the proposed site or 2 km (1.2 mi) of proposed transmission corridors, access corridors, and offsite areas.	Yes	No	Yes	It is unclear if the description of historic properties include those located within the transmission line corridors or if they are limited to the BLN site. It is also unclear if cultural resource surveys have been conducted of the transmission lines and if any historic properties were located within the transmission line corridors. Access to APE map may clarify this further as well as a clarification of TVA's Sensitive	It is possible, if cultural resource surveys have not been completed for the transmission line corridors then these would need to be completed to address operation impacts. Sensitive Area				

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					Area Review procedure discussed in 2.5.3 may address this issue. One of the five archaeological sites (1JA111) located on the BLN site has not been formally evaluated but is described as “potentially eligible”. A formal evaluation has not been completed and would be necessary if the site cannot be avoided. (2.5.3 and 4.1.3 and 5.1.3.2)	Review process may address this.				
4.1.3	The State Historic Preservation Officer’s (SHPO’s) comments on the impact of the proposed project on important historic properties (from consultation with State agencies and Native American tribal agencies).	Yes	No	Yes	Additional correspondence beyond initial correspondence between SHPO and the archaeological contractor and NuStart and SHPO and TVA was referenced but not included (2.5.3, 4.1.3 and 5.1.3).					
4.1.3	The applicant’s procedures for identifying the potential for human remains to occur in the project and for complying with provisions of the Native American Graves Protection and Repatriation Act in the event of an inadvertent discovery.	Yes	No	Yes	ER indicates that TVA intends to develop a plan of action to address NAGPRA and an MOA to address conditions of construction monitoring. Proposed contents of the subject plan of action and MOA were not included (4.1.3.3).					

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4.1.3	The applicant's finding on whether important cultural and historical resources will be affected. During construction.	Yes	No	NA	A cultural and historical overview is not included. A general/brief description of the cultural and historical context for the region would be helpful for understanding significance of resources being affected. It is also unclear if cumulative and/or secondary impacts resulting from modifications to the docking facilities and discharge structure and potential off-site activities associated with the need for borrow material described in Sections 4.1, 4.2 and 4.3 have been adequately addressed in the ER (4.1.3 and 5.1.3).		Cultural and historical overview descriptions are likely readily available in the referenced cultural resources survey reports.			
4.1.3	The applicant's finding on whether important cultural and historical resources will be adversely affected.	Yes	No	Yes	No details for cultural resources located within the transmission line corridors were provided or indication of monitoring, or avoidance measures that may be implemented to avoid such resources, if any. It is also unclear if cumulative and/or secondary impacts resulting from modifications to the docking facilities and					

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					discharge structure and potential off-site activities associated with the need for borrow material described in Section 4.1, 4.2, and 4.3 have been adequately addressed in the ER (4.1.3 and 5.1.3).					
4.1.3	The applicant's proposed avoidance measures to avoid impact to important cultural and historical resources during construction.	Yes	No	Yes	ER indicates that TVA intends to develop a plan of action to address NAGPRA and an MOA to address conditions of construction monitoring. Proposed contents of the subject plan of action and MOA were not included (4.1.3.3).					
4.2.1	The following list of data should be obtained: <ul style="list-style-type: none"> <li>- descriptions of the physical characteristics of the surface-water bodies and groundwater aquifers</li> <li>- identification and description of project related construction activities expected to result in hydrologic alterations at the site, transmission corridors, and offsite areas. Activities include construction of cofferdams and storm sewers; dredging operations; placement of fill material into the water; creation of shoreside facilities involving bulkheads, piers, jetties, basins, or other structures or activities with potential to alter existing shoreline processes; construction of intake and outfall structures; water channel modifications; construction of roads and bridges; operations affecting water levels (flooding); dewatering activities; and</li> </ul>	Yes	No	Yes	There is a potential for dewatering during excavation and construction in areas where excavations will reach ~10 ft below the water table. However, potential dewatering efforts are not described or quantified in any detail.					

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	construction activities contributing to sediment runoff, e.g., road construction, clearing and grading, fill or spoil placement									
4.3.1	Has the applicant determined the areal extent and location of potential impacts, including the total area of land to be disturbed? Did the applicant provide a site map showing proposed buildings, the land to be cleared, borrow areas, waste disposal areas, the construction zone, and the site boundary and the vegetation communities/ habitats that will be impacted?	Yes	No	Yes	Are there buildings scheduled for demolition? Where specifically will borrow areas and dredge spoils be located? Black-and- white figure format does not provide adequate detail.					
4.3.1	Did the applicant identify the construction activities that impact “important” species and habitats of the site and vicinity, transmission corridors, and offsite areas (e.g., construction activities that will dewater any wetlands, ponds, or seepages or alter surface drainage patterns supporting terrestrial biota/wetlands)?	Yes	No	Yes	Potential grade and fill impacts to surface water flow outside the construction zone not addressed. Will special species habitat be impacted outside construction area?					
4.3.1	Has the applicant identified the area to be used on a short term basis during construction, and plans for restoration of this land?	Yes	No	Yes	Laydown areas not identified.					
4.3.2	Has the applicant identified the construction activities that could impact “important” aquatic species and habitats of the site and vicinity, transmission corridors, and offsite areas? Is there a map available that shows the areal extent and location of the construction activities?	Yes	No	Yes	4.3.2.1 Preliminary surveys indicate existing intake channel may function appropriately without dredging. 4.2.1.2 and 4.2.1.4 state that dredging is either “anticipated” or “expected.” Maps of the area to be dredged were not located. In partic- ular, Section 4.2.1.2 discusses mainte- nance dredging , installation of riprap to stabilize banks of					

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					the embayment and river shoreline. But details and maps are not provided.  4.3.2.5 Construction of reservoir may involve pile driving, dredging, barge traffic, and other noise producing activities. No details provided as to what or where.					
4.3.2	Is there information available that can be used to determine how construction activities will impact “important” species and their habitats (e.g., those resulting from scouring and siltation, dredging and soil disposal, and interference with shoreline processes)? Is there information that can be used to estimate the magnitude and duration of such impacts? Consider potential disturbances of benthic areas by the following construction activities: <ul style="list-style-type: none"> <li>- placement of intake and discharge structures</li> <li>- channel modifications for navigation or flow control</li> <li>- placement and removal of cofferdams</li> <li>- construction of bulkheads, piers, jetties, basins, and storm sewers</li> <li>- direct dredging, including the area that may be affected by resulting siltation and turbidity</li> <li>- percent of the water body cross section that might be obstructed by construction activity at any time</li> <li>- time and duration of such obstruction</li> <li>- potential changes to water quality caused by exposure of substrate to contaminants during construction (e.g., dredging for intake channels, cofferdam construction).</li> </ul>	Yes	No	Yes	4.2.1.1 – states that there will be “Construction or modification of existing cooling water intake structure and discharge structure for water withdrawn from and discharged into the Guntersville Reservoir/Tennessee River... Construction of new and/or potential modification of docking facilities for barges/vessels.” However, no maps of impacted areas or details on the construction or modification of these structures was found.					



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4.3.2	Is there information available that can be used to assess the potential for reversibility of impacts following completion of construction? Are there plans for environmental improvement following construction?	Yes	No	Yes	Section 4.3.2.1 provides information related to dredging. No information provided relative to impacts from modifications to barge slip or discharge.					
4.3.2	Are there plans for limiting impacts during construction (e.g., the maintenance of siltation ponds or catchment basins)? Are recognized best management practices cited as means for limiting impacts?	Yes	No	Yes	4.3.2 and 4.2.2.1 Discussed – but no references provided.  Referenceable sources for this information are needed.					
4.3.2	If dredging is involved, are there plans for disposal of dredged material and placement of fill material?	Yes	No	Yes	4.2.1.4 states they plan to place dredged material above the 500 yr flood elevation. Details on location not provided.					
4.4.1	Distribution of people, buildings, roads, and recreational facilities vulnerable to impact from construction-related activities.	Yes	No	Yes	Need clarification of methodology. Areas forecast for impact need to be described in more detail (e.g., characteristics of the population in Creeks Edge)					
4.4.1	Predicted air pollutant levels at sensitive areas identified in the first item listed above.	Yes	No	Yes	4.4.1.6 does not address air quality impacts from traffic					
4.4.2	Annual expenditures within the region for materials and services during construction.	Yes	No	Yes	Section 4.4.2.2 –need information about annual expenditures				No	Chapter 8, cost benefit, and Chapter 9, comparison of alternatives
4.4.2	Plans to supplement public facilities and services to support construction and agencies responsible for facility expansion.	Yes	No	Yes	Sections 4.4.1.3 and 4.4.2.3-5 discussed in very general way. Need discussion of increased need for				No	Chapter 8, cost benefit, and Chapter 9, comparison of alternatives

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					road repair as a consequence of increased traffic, for example. A referenceable source for this information is needed.					
4.4.2	Taxes by type and jurisdiction to be paid during construction.	Yes	No	Yes	4.4.2.2.1 No real data or analysis is provided. Sec- tion 4.4.2.2.1 is vague and does not include the level of analysis presented in Section 10.4.1.1.1. Need estimates of taxes, and the expected revenues including their relationship to expected needed expenditures for infrastructure for Section 4.4.2.2.1.				No	Chapter 8, cost benefit, and Chapter 9, comparison of alternatives
4.4.2	Annual construction labor force requirements (for each quarter year, if possible) over the construction period. Where necessary, requirements by major construction craft may be reported.	No	No	Maybe	Section 4.4.2.1 – Need more specific estimate of peak construction workforce, and information about distribution over time, and specifics of workforce characteristics.	Maybe			No	Chapter 8, cost benefit, and Chapter 9, comparison of alternatives
4.4.3	Pathways where any environmental (including socioeconomic) impact during construction may interact with cultural or economic facts that may result in disproportionate environmental impacts on minority and low-income populations.	Yes	No	Yes	In Sections 4.4.3.1 and 4.4.3.2 – need methodology and rationale. Provide indication that analysis is based on community-specific information. Assumptions that					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
					there are no particular pathways or vulnerabilities relevant to the minority populations in the area, is not supported and therefore limiting consideration to whether the overall impacts would be enough to affect the minority population (as they would affect anyone else) is inadequate. NRC feels that EJ will be an area that is scrutinized very carefully. This ER did this in an entirely pro-forma way, just running the numbers without investigating on the ground, so we need to be cautious.					
4.4.3	Any assessment (qualitative or quantitative, as appropriate) of the degree to which each minority or low-income population would disproportionately experience adverse human health or environmental (including socioeconomic) impacts during construction as compared with the entire geographic area. In addition, information should be obtained on any assessment comparing the impacts with the larger overall geographic area encompassing all of the alternative sites.	Yes	No	Yes	Need detailed explanation of method or indication that this was done in Section 4.4.3. A referenceable source for this information is needed.					
4.4.3	Any assessment (qualitative or quantitative, as appropriate) of the significance or potential significance of such environmental impacts on each minority and low-income population.	Yes	No	Yes	Need detailed explanation of method or indication that this was done in Section 4.4.3. A referenceable source for this information is needed.					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
4.4.3	Any assessment of the degree to which each minority and low-income population would disproportionately receive any benefits compared with the entire geographic area.	Yes	No	Yes	This was addressed only indirectly, with no explicit analysis. Need detailed explanation of method with analysis for Section 4.4.3. A referenceable source for this information is needed.					
4.6	Data and information related to the applicant's commitments to measures and controls to limit potential impacts should consist of the following three elements: (1) identification of the impact, (2) the planned control program, including monitoring, and (3) the control procedures – for the following areas: - noise - erosion - dust - traffic - effluents and wastes - surface-water impacts - groundwater impacts - land-use protection/restoration - water-use protection/restoration - terrestrial ecosystem impacts - aquatic ecosystem impacts - socioeconomic impacts - radiation exposure to construction workers - other site-specific impacts.	Yes	No	Yes	Need more specific information on what is planned to limit impacts – i.e., what specific BMPs are to be used.					
5.1.2	Has the applicant addressed the question of impacts from seasonal access to transmission corridors that cross land in agricultural or other productive use?	Yes	No	Yes	Seasonal access not explicitly addressed. To assess cumulative impacts, some addi- tional descriptive information may be required (see Sec- tion 4.1.2). In addition, impacts of the activities required					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
					to re-energize the transmission lines (listed in Section 3.7) need to be addressed.					
5.1.3	A description and National Register evaluation of cultural resources within 15 km (9 mi) of the proposed site or 2 km (1.2 mi) of proposed transmission corridors, access corridors, and offsite areas.	Yes	No	Yes	No details for cultural resources located within the transmission line corridors were pro- vided or indication of monitoring, or avoid- ance measures that may be implemented to avoid such resources, if any. It is also unclear if cumulative and/or secondary impacts resulting from modifications to the docking facilities and discharge structure and potential off-site activities associated with the need for borrow material described in Sections 4.1, 4.2, and 4.3 have been adequately addressed in the ER (4.1.3 and 5.1.3).	It is possi- ble, if cultural resource surveys have not been com- pleted for the trans- mission line corri- dors then these would need to be com- pleted to address operation impacts. Sensitive Area Review process may address this.				
5.1.3	The SHPO's comments on the impact of the proposed project on important historic properties.	Yes	No	Yes	No details for cultural resources located within the transmission line corridors were included and no indication of SHPO comments on these resources. Reference to correspondence between SHPO and					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
					TVA is referenced, but not included (2.5.3, 3.7.2.1, 4.1.3, and 5.1.3)					
5.1.3	The applicant's finding on whether important cultural and historical resources will be affected during operations.	Yes	No	Yes	No details for cultural resources located within the transmission line corridors were pro- vided or indication of monitoring, or avoid- ance measures that may be implemented to avoid such resources, if any. Access to APE map may clarify this further as well as a clarification of TVA's Sensitive Area Review procedure discussed in 2.5.3 may address this issue. (4.1.3 and 5.1.3) It is also unclear if cumulative and/or secondary impacts resulting from modifications to the docking facilities and discharge struc- ture and potential off- site activities asso- ciated with the need for borrow material described in Sec- tions 4.1, 4.2 and 4.3 have been adequately addressed in the ER (2.5.3 4.1.3, 5.1.3)					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
5.3.1.2	Has the applicant provided a current NPDES permit with a 316(b) determination, if appropriate, or equivalent State permits and supporting documentation?	Yes	No	Yes	5.2.2.2.1 Current NPDES permit will need to be revised for new facility					
5.3.1.2	Has the applicant identified the “important” aquatic organisms and their life stages susceptible to entrapment, impingement, or entrainment?	Yes	No	Yes	5.3.1.2.1 Important species were identified in part. Additional information and data needed related to abundance of pink mucket mussel and Anthony’s river snail. Information on recreationally important species and potential for entrapment, impingement and entrainment needed.					
5.3.1.2	Is there information available to estimate the levels of susceptibility for fish or shellfish species to be entrapped or impinged by the cooling system, in either qualitative or quantitative terms? Is there information about the design and proposed operation of any proposed systems (e.g., screen wash or fish return system) and how the potential for entrapment and impingement with that system?	Yes	No	Yes	5.3.1.2.1 Species composition data is needed to verify statement that sampling near intake and discharge is not warranted. Details on Widows Creek Fossil Plant cooling system (design, water flow rate, etc.) are needed.					
5.3.1.2	Has the applicant estimated the magnitude of the potential impingement and entrainment impacts on the species populations and the aquatic ecosystem?	Yes	No	Yes	5.3.1.2.1 Need more information for tie-in to Widows Creek Fossil Plant as a surrogate and more information on species					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
5.3.2.2	Has the applicant provided a current NPDES permit with a 316(a) determination (if required) or equivalent State permits and supporting documentation?	Yes	No	Yes	5.2.2.2.1 Current NPDES permit will need to be revised for new facility					
5.3.2.2	Are there “important” aquatic species present? Are the types, life stages, and relative abundance of impacted “important” biota described? Is there a description of the specific aspects of the proposed discharge-system operation responsible for the impacts on the biota?	Yes	No	Yes	5.3.2.2 More information needed to determine					
5.3.2.2	Are the aquatic species susceptible to heat shock resulting from facility cooling-system discharges to the receiving water bodies? Is there information to determine if the effects will be detectable or may destabilize or noticeably alter population levels?	Yes	No	Yes	5.3.2.2 Need references from Chapter 2 related to fish abundance in vicinity of discharge.					
5.3.2.2	Has the applicant considered the biological effects of thermal, chemical, and physical alterations to the receiving water body on the identified “important” aquatic species? Are there estimates of survival from these discharge system impacts, and estimates of the relative or absolute losses of the impacted populations?	Yes	No	Yes	5.3.2.2 Need reference related to 2007 survey for mussels and information specific to recreationally important species.					
5.3.3.2	Has the applicant identified the concentration and chemical composition of dissolved and suspended solids in cooling tower basins or spray canals on a seasonal basis?	Yes	No	Yes	Chemical concentrations are not provided on seasonal basis in Table 5.3-3. Suspended solids information is not provided.					
5.3.3.2	Has the applicant considered impacts to existing shoreline if flows are changes due to increased withdrawals?	Yes	No	Yes	No discussion of impacts of water level flux in Gunterville Res. or Town Creek Embayment					
5.4.1	Distances from the proposed reactor to the following points or areas for each of the 22½-degree radial sectors centered on the 16 cardinal compass directions: - Nearest site boundary - To a distance of 8 km (5 mi), each	Yes	No	Yes	Table 2.7-119 is incomplete (e.g., no residences in 13 sectors and yet gardens in most					



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	receptor and its location for the nearest residence, milk cow, milk goat, meat animal, and vegetable garden larger than 50 m <sup>2</sup> - If the applicant proposes elevated releases of radioactive effluents as defined in Regulatory Guide 1.111, the location of all milk cows, milk goats, meat animals, residences, and vegetable gardens larger than 50 m <sup>2</sup> out to a distance of 5 km (3 mi).				sectors) and hard to reconcile with FSAR Figure 2.1-206.					
5.4.1	For the applicable locations noted above, the grazing seasons and fraction of daily intake of cows, meat animals, and milk goats derived from pasture or fresh forage during the grazing season.	Yes	No	Yes	Table 5.4-6 has some of this information, but not all, and conflicts with Table 2.7-119 on distance to nearest residence/house. Table 5.4-6 claims to define "Nearest" as "the location at which the highest radiation dose to an individual from the applicable pathways has been estimated. Locations by all compass directions and distances are not provided because the highest dose location is identified." This reviewer would like to see all the results. The source of much of the data in Table 5.4-6 is not given.					
5.4.1	The nearest present and known future locations from which an individual can obtain aquatic food and/or drinking water.	Yes	No	NA	Table 5.4-1 has some nonsensical entries. If these were used in other calculations, their results are suspect. The problem entries:					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
					Average Distance to Where Fish are Caught (mi.); Down- stream Distance ... commercial fishing; Downstream distance... shoreline activities (mi.); Dilution Factor for Sport Fishing (mi.). The latter should not be in miles. These 4 entries have identi- cal values, which is not believable, especially since one of them should not be in miles.					
5.4.1	The nearest present and known future shoreline areas that an individual can use for recreational purposes.	Yes	No	NA	Table 5.4-1 has some nonsensical entries. If these were used in other calculations, their results are suspect. The problem entries: Average Distance to Where Fish are Caught (mi.); Downstream Distance ... commercial fishing; Downstream distance... shoreline activities (mi.); Dilution Factor for Sport Fishing (mi.). The latter should not be in miles. These 4 entries have identi- cal values, which is not believable, especially since one of them should not be in miles.					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
5.4.1	The following distributional data for each of the 22½-degree radial sectors centered on the 16 cardinal compass directions for radial distances of 2, 4, 6, 8, 10, 20, 40, 60, and 80 km (1.2, 2.5, 3.7, 5, 6.2, 12, 25, 27, and 50 mi) from the reactor: - Projected population for five years from the time of the licensing action under consideration - Present annual meat production (kg/yr) - Present annual milk production (liter/yr) - Present annual vegetable production (kg/yr) - Estimate of direct radiation doses from sources within the site.	Yes	No	Yes	Population for 2057, not 5 years. Meat, milk, vegetables are averages, not by compass point.					
5.4.1	The present commercial fish and invertebrate catch (in kg/yr) from waters within 80 km (50 mi) downstream (or 80-km [50-mi] radius for lake or coastal sites) of the facility radwaste discharge; major catch locations, their distance from the facility radwaste discharge, and the amount caught within 80 km (50 mi) of the facility that is consumed; transit time from the point at which the discharge stream enters an unrestricted area to each major catch location, the estimated dilution at each location, and the basis for calculating transit time and dilution.	Yes	No	Yes	Major catch locations, distances, transit times (unless 0 is used) not specified. Dilution factors in Table 5.4-1 have some problems. If these were used in other calculations, their results are suspect. Dilution Factor for Sport Fishing (mi.)—should not be in miles.					
5.4.1	Present and known future drinking water intake locations within 80 km (50 mi) of the facility radwaste discharge (downstream or radius); the transit time and estimated dilution at each major location, the basis for calculating transit time and dilution, and the populations served or the daily water consumption at each location.	Yes	No	Yes	Table 5.4-1 has some nonsensical entries. If these were used in other calculations, their results are suspect. The problem entries: Average Distance to Where Fish are Caught (mi.); Downstream Distance ... commercial fishing; Downstream distance... shoreline activities (mi.); Dilution Factor for					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
					Sport Fishing (mi.). The latter should not be in miles. These 4 entries have identical values, which is not believable, especially since one of them should not be in miles.					
5.4.1	The irrigation rate (liter/m2/month), crop yield (kg/m2), annual production (kg/yr), and growing period (days) for irrigated land using water withdrawn within 80 km (50 mi) of the facility radwaste discharge (downstream or radius) when crop production has the potential for contributing 10% or more to individual or population doses because of liquid effluents; the crop type and its use (e.g., human consumption and meat animals), total crop production (by type) within the 80-km (50-mi) distance, and the amounts consumed within an 80-km (50-mi) radius of the facility; transit time from the point at which the discharge stream enters an unrestricted area to the points of withdrawal, estimated dilution at each withdrawal point, and the bases for calculating transit times and dilution factors.	Yes	No	Yes	There is little information on these parameters, and no statement that crop production has <10% dose contribution. § 5.4.2.1 states: "There is no record of crop or pasture downstream of the BLN site, therefore this pathway is not evaluated." "There is no record of consumption of aquatic vegetation in the area surrounding the BLN site, therefore this pathway is not evaluated."					
5.4.3	Radiation dose data including - Maximum individual doses from liquid effluents - Maximum individual doses from gaseous effluents - Maximum individual doses from direct radiation sources - Collective doses to the population within 80 km (50 mi) of the facility - Occupational collective doses.	Yes	Yes Yes Yes No No	NA NA NA Yes Yes	The only collective dose mentioned is under construction workers, fuel cycle and from background.					
5.5.1	Other site-specific waste-disposal activities (e.g., spoils from intermittent dredging activities).	Yes	No	Yes	The only land disposal (on-site) item mentioned in the ER is dredge spoils. No location, quantity, composition information is provided.				No	Section 4.3.1 Terrestrial ecology.

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
5.6.1	Does the applicant partake in any wildlife- management practices?	Yes	No	Yes	No mention of wildlife practices					
5.6.2	Has the applicant identified operational and maintenance activities associated with transmission facilities that could adversely affect “important” aquatic species and habitats? The resources to be considered include marshlands, wetlands, impoundments, and water bodies.	Yes	No	Yes	5.6.2 Need reference or copy of procedures used by TVA for ROW maintenance near aquatic ecosystems.					
5.6.2	If adverse impacts of sufficient magnitude have been identified, has the applicant identified the potential mitigating actions or alternative practices to limit or avoid the impacts?	Yes	No	Yes	5.6.2 Need reference or copy of procedures used by TVA for ROW maintenance near aquatic ecosystems.					
5.8.2	Expenditures within the region for materials and services during operation.	Yes	No	Yes	Section 5.8.2.2 bases the estimate on a regional model, but text does not discuss expenditures for materials and services or provide any specific infor- mation, as it also did not in Section 4.4.2.					
5.8.2	Plans to adjust public facilities and services during the transition period from the construction to the operation phase and agencies responsible for accomplishing this adjustment.	Yes	No	Yes	Section 5.8.2.3.1 does not consistently reflect that in most cases transition to the operations stage will require downsizing, rather than a further increase in capacity in local infrastructure.					
5.8.2	Taxes by type and jurisdiction to be paid annually during operation.	Yes	No	Yes	Section 5.8.2.2.1 Provide estimates of taxes, and relate expected revenues to expected needed expenditures					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
5.8.3	Pathways where any environmental (including socioeconomic) impact during operations may interact with cultural or economic facts that may result in disproportionate environmental impacts on minority and low-income populations.	Yes	No	Yes	5.8.3 Provide analysis of special pathways or vulnerabilities pertinent to minority populations					
5.8.3	Any assessment (qualitative or quantitative, as appropriate) of the degree to which each minority or low-income population would disproportionately experience adverse human health or environmental (including socioeconomic) impacts during operations as compared with the entire geographic area. In addition, information should be obtained on any assessment comparing the impacts with the larger overall geographic area encompassing all of the alternative sites.	Yes	No	Yes	5.8.3 Provide analysis of special pathways or vulnerabilities pertinent to the minority populations.					
5.8.3	Any assessment (qualitative or quantitative, as appropriate) of the significance or potential significance of such environmental impacts on each minority and low-income population.	Yes	No	Yes	5.8.3.4 makes only the most perfunctory conclusionary statement. A referenceable source for this information is needed.					
5.8.3	Any assessment of the degree to which each minority and low-income population would disproportionately receive any benefits compared with the entire geographic area.	Yes	No	Yes	5.8.3.3 makes only the most perfunctory conclusionary statement. A referenceable source for this information is needed.					
6.5.2	Did the applicant complete any pre-application monitoring to examine the distribution and abundance of “important” species and habitats? Critical life history information should include parameters such as spawning areas, nursery grounds, food habits, feeding areas wintering areas, and migration routes to the extent that the proposed project is expected to affect these parameters.	Yes	No	Yes	6.5.2.1 Copies of surveys referenced in this section are needed.					

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6.5.2	Has the applicant supplied a basis for the decision to conduct/not conduct monitoring (preapplication/preoperational/operational)?	Yes	No	Yes	6.5.2.2 Need basis for determination that the current monitoring program is appropriate for the Bellefonte site.					
7.2	What population data were used in the evaluation? Are the data consistent with data presented in the demographic discussion? Are population projections based on the most recent census and appropriate projection techniques? (Check with socioeconomic project reviewer)	Yes	No	Yes	Information is needed on why current census data are used with no projection to start up time.					
7.2	What land use data were used in the evaluation? Were they adjusted for potential changes in land use? (Check with land use project reviewer)	Yes No	No	Yes	There is no discussion in Section 7.2 as to potential changes in land used.					
7.2	Does the ER contain a list of surface water users within 50 miles of the site, including all public water supplies and major industrial and agricultural users? Does the list include location and withdrawal rate of each user? (Check with hydrology project reviewer)	Yes	No	Yes	Table 2.3-31 showing local surface water users omits distance and location information per 10 CFR 2.390(a)(3). All counties bordering the Tennessee River within the 50 mile radius are not reported in this table. It is anticipated this information will be available at the site audit.					
7.2	Does the severe accident analysis in the ER consider the atmospheric, surface water, and groundwater pathways?	Yes	No	Yes	Need to provide modeling details for surface water pathway results given in ER. Also need to provide some information on groundwater pathway.					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
7.4	Does this section specify the estimated distance from the proposed reactor site to the spent fuel disposal facility?	No	No	Yes	Shipping distances were not provided in Sections 3.8 or 7.4.					
7.4	If the spent fuel is not in compliance with 10 CFR 51.52(a), does the ER contain an analysis of the environmental effects of transportation accidents that could occur?	No	No	Yes	A full and detailed analysis of transportation impacts is not provided as required by 10 CFR 51.52(b)					
8.1	Number and types of customers and major electrical load centers in the relevant service area.	Yes	No	Yes	8.1 No references to sources of numbers throughout					
8.2.1	Methodology, assumptions, and information sources used to develop the forecasts of electricity consumption, peak load demand, and load factor.	Yes	No [see note in 5]	Yes	8.1 and 8.2 – Describes the models, but does not provide any specific detail or references to documentation					
8.2.1	Results of any independent assessments of the forecasted electricity consumption and peak load demand.	Yes	No	Yes	8.2.1.2 and 8.2.2					
8.2.1	Comparison of forecasted electricity consumption and peak load demand to other independent forecasts and reasons for significant differences.	No	No	Yes	8.2					
8.2.2	Methodology and information sources used to develop the forecast of economic, weather, price of electricity, energy mix, and demographic/ population trends.	Yes	No	Yes	8.2 A referenceable source for this information is needed.					
8.3	Description of the methodology, assumptions, and information sources used to develop the forecast of electricity supply mix.	Yes	No	Yes	8.2 A referenceable source for this information is needed.					
8.3	Identification of existing power facilities that serve the relevant service area, and their associated electricity generation capacity, whose retirement has been announced or is anticipated within a few years before and after start of operation of the applicant's proposed facility.	No	No	Yes	8.3 includes no text and tables are only withheld data					
8.3	Identification of firmly committed new facilities and proposed new facilities that will serve the relevant service area, and their associated electricity generation capacity, that are expected to start operation between a few years before and	No	No	Yes	8.3 includes no text and tables are only withheld data					



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		2.	3.	4.	5.	7.	8.	9.	10.	11.
	after start of operation of the applicant's proposed facility.									
9.2.3	Decommissioning cost for the proposed project and for each alternative.	Yes	No	Yes	This topic was not directly addressed for the alternatives.					
9.3	Descriptions of how the site- selection process was used to identify and select the ROI and potential, candidate, and alternative sites.	Yes	No	Yes	They apparently went from 24 sites to 9 candidate sites; however, there is no information on this step. The way it reads, it appears as though they had 9 sites in which they had some sort of affiliation (ownership stake), of which 4 were immediately eliminated based on one the available land-use and cooling water criteria (I would have thought that by the time they went from 200 to 9 candidate sites, that these 4 would have already been eliminated). The resulting alternative sites are probably okay, but the lack of details and complete absence of current references, makes it difficult to conclude that these sites were the "best available sites" in 2006.					
9.3	Data sources used in the site-selection process, including results of site-specific field investigations.	Yes	No	Yes	The key studies they cite are all the original EIS's completed in 1974,					

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					1975, 1977, and 1978. There are no updated references, so it is difficult to have confidence in any of the numbers provided.					
9.3	Land-use descriptions for alternative sites	Yes	No	Yes	More information is needed regarding the exact condition of the sites (for brown- fields) – both how TVA left them when it ceased construction and sold sites and the current land-use activities on the site. All references are dated. Aerial photos of sites provided, but text descriptions are insufficient.					
9.4.2	Capital, maintenance, and operating costs for the proposed intake system, discharge system, and water treatment system, and water costs for the proposed water supply.	Yes	No	Yes – if the appli- cant has an esti- mate, and can pro- vide it at the audit.	Will request at the site audit.  These costs projec- tions, specific to Bellefonte and especially to the retro-fitting of existing structures, may be elsewhere in the ER; however, it will be good to review for retro- fitting cost estimates regarding the intake, towers, and discharge structures. These costs are not developed specifi- cally for BLN in Section 10.4. Only					

1. Issue Area/Topic (ESRP, Reg or RG Section)	Sufficiency Review Question  Is the following material found and cited in the Environmental Report, Site Safety Analysis Report, or Site Redress Plan?	Completeness and Technical Sufficiency Which Form Basis for Acceptability for Docketing				Changes to Planning Assumptions to be Considered in Development of Baseline Review Schedule			Review Dependencies Among Concurrent Reviews	
		2.	3.	4.	5.	7.	8.	9.	10.	11.
					<p>generic industry cost info is presented for a new plant.</p> <p>Cost of managing sediment is not shown, e.g., dredging, or sediment removal from the raw water.</p>					
9.4.2	Capital, maintenance, and operating costs for the proposed intake system, discharge system, and water treatment system, and water costs for the proposed water supply.	Yes	No	Yes – if they have made an estimate, and can provide at the audit.	<p>Will request at the site audit.</p> <p>These costs projections, specific to Bellefonte and especially to the retro-fitting of existing structures, are likely elsewhere in the ER; however, it will be good to review for retro-fitting cost estimates regarding the intake, towers, and discharge structures. These costs are not developed specifically for BLN in Section 10.4. Only generic industry cost information is presented for a new plant.</p> <p>Cost of managing sediment is not shown, e.g., dredging, or sediment removal from the raw water.</p>					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
10.4.1	Data on other benefits, quantified to the extent possible (e.g., annual local, State, and Federal tax payments, number and type of jobs, and total annual wages paid). [ESRPs 4.4.2, 5.8.2]	Yes	No	Yes	4.4.2.2 and 5.8.2.2.1 Not addressed adequately				No	Socioeconomics 2.5.1.3, 4.4.2.2 and 5.8.2.2.1, though this is not referenced in Chapter 8
10.4.1	Description of other nonquantifiable or nonmonetary benefits (e.g., new recreational facilities). [ESRPs 4.1.1 through 5.8.3]	Yes	No	Yes	4.4.2.2 and 5.8.2.2.1 Not addressed with adequate specificity,				No	Socioeconomics 2.5.1.3, 4.4.2.2 and 5.8.2.2.1, though this is not referenced in Chapter 8
10.4.2	Estimates of the capital cost, annual operating and maintenance costs, decommissioning costs, and any other internal costs of the proposed facility, including alternative modifications. [ESRP 9.4.1, 9.4.2, 9.4.3]	Yes	No	Yes	9.3.3.4 presents only relative ratings, no actual quantitative measures				No	Chapter 9.3.3.4 and 4.4.2.2 and 5.8.2.2.1 should all be consistent.
10.4.2	Description of differences in costs between alternatives and alternative system configurations. [ESRPs 9.4.1, 9.4.2, 9.4.3]	Yes	No	Maybe – I'm not exactly clear how much specificity is needed	9.3.3.4 presents only relative ratings, no actual quantitative measures	Maybe			No	This information is now in Chapter 9, not in Chapter 8. Needs to be linked to 1.1 and 4.4.2.2 and 5.8.2.2.1, none of which have specific information about costs or purchases
10.4.2	Comparison of the estimated costs of the proposed facility with other independent or applicant-commissioned cost estimates and reasons for significant differences.	No	No	Maybe	There are no actual cost data presented in any section, but Chapter 9 does include qualitative cost comparisons. However, it does not present any other independent data.	Maybe			No	Should link to Chapter 9.
Cumulative Impacts (No ESRP Section)	Has the applicant identified the activities of other agencies that have occurred/will occur in the potential impact area that may contribute to a cumulative impact on terrestrial or aquatic resources?	Yes	No	Yes	Management activities on Mud Creek WMA, Bellefonte Island, Coon Gulf, and					

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		2.	3.	4.	5.	7.	8.	9.	10.	11.
					Section Bluff may impact regional resources; no discussion on potential impacts (+ or -)					
Cumulative Impacts (No ESRP Section)	Has the applicant identified projects in the region that may contribute to a cumulative impact on “important species” or habitat?	Yes	No	Yes	Impacts of regional land management trends (agriculture, development, etc.) to loss of important habitats (wetlands, forest) not discussed.					
Cumulative Impacts (No ESRP Section)	Has the applicant identified the activities of other agencies that have occurred/will occur in the potential impact area that may contribute to a cumulative impact on terrestrial or aquatic resources?	No	No	Yes	No identification of activities of other agencies was identified.					
Cumulative Impacts (No ESRP Section)	Has the applicant identified projects in the region that may contribute to a cumulative impact on “important species” or habitat?	No	No	Yes	5.3.1.2.1 refers to Widows Creek Fossil Plant but no other projects were identified and the impacts to important species were not explicitly discussed.					