

From: Balsam, Briana
To: Imboden, Andy; Logan, Dennis
Subject: RE: non-concurrence response letter to NMFS (Columbia) ML11335A136
Date: Monday, December 19, 2011 4:36:00 PM

Andy,

I updated the letter and pulled out the majority of it into an enclosure as you suggested. It is with Sylvia now, who is going to add you to concurrence before it goes to Dave for signature.

Briana

From: Imboden, Andy
Sent: Friday, December 16, 2011 4:36 PM
To: Balsam, Briana; Logan, Dennis
Subject: non-concurrence response letter to NMFS (Columbia) ML11335A136

Hi Briana and Dennis-

Dave was reviewing the subject line letter and asked me if I wanted to take a look/concur. I found very few nits, the markup is on Briana's chair. I do have more strategic comments, however:

- We don't have the same history with the Northwest Regional Office of NMFS as we do with some others. I don't know how much they've worked with NRC in the past, and I know that Dan has had a hard time getting in touch with them (maybe you have too). Where the *Northeast* Regional Office failed to learn from multiple interactions with NRC, I would like to disagree with the *Northwest* Regional Office as softly as possible. As such, the overall structure of the letter should be a short (about one page) "cover letter" with a more extensive and technical enclosure.
- The technical enclosure should contain the discussion currently in the letter under "I. Entrainment of Juvenile Salmonids" through "III. CGS's Cooling Water Intake System"
- The technical enclosure's discussion of "III. CGS's Cooling Water Intake System" should be expanded using information from the 7/15/11 Colosi letter, however it should only contain selected and relevant parts of the Colosi letter. What I see as relevant to Columbia begins at "I. The NRC's Aquatic Regulatory Authority" on page 2 of the Colosi letter and goes to the seventh paragraph on page 4 ending at "NRC deference to EPA's statutory authority, either directly exercised by EPA or as delegated to the states, extends to operational water quality impacts and aquatic biota protections, as well." The rest of the Colosi letter is not relevant to Columbia or the Northwest Regional Office of NMFS.
- Add RERB branch chief to the concurrence block.

Thanks,
Andy