

Clay C. Warren Chief Operating Officer

April 29, 1997

WO 97-3048

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Mail Station P1-137 Washington, D. C. 20555

Subject:

Docket No. 50-482: Change in Waterfowl Monitoring

Program

Gentlemen:

As discussed in NUREG-0878, "Final Environmental Statement Related to the Operation of Wolf Creek Generating Station, Unit 1," Section 5.5.1.2, a general survey program to monitor waterfowl collision events (with plant transmission lines) was recommended for implementation at the beginning of plant operation and conducted for a minimum of two years. This program was incorporated into the wildlife monitoring program discussed in Section 2.2 (e) of Appendix B (Environmental Protection Plan) to Facility Operating License No. NPF-42.

The purpose of this letter is to inform the NRC of changes Wolf Creek Nuclear Operating Corporation has implemented in the methods used to monitor waterfowl collision events. Details on the results of monitoring waterfowl collisions, as well as justification for modifying this portion of the wildlife monitoring program, are provided in the attachment.

If you have any questions concerning this matter, please contact me at (316) 364-8831, extension 4485, or Mr. Brad S. Loveless, at extension 4530.

ery truly yours,

Cl C. Warren

CCW/jad

cc: E. W. Merschoff(NRC)

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# WOLF CREEK GENERATING STATION WATERFOWL MONITORING PROGRAM CHANGES

Reference:

 NUREG-0878, Final Environmental Statement Related to the Operation of Wolf Creek Generating Station, Unit 1, June 1982

2) Wolf Creek Generating Station, Unit No. 1, Environmental Report, Operating License Stage (ER-OL)

#### BACKGROUND

Section 4.2.2 of Appendix B to Facility Operating License No. NPF-42 contains a requirement concerning the monitoring of waterfowl usage of the Wolf Cresk Lake. The requirement states, "A general survey program shall be accomplished to document significant waterfowl collision events and determine if mitigation is warranted." Section 2.2(e) of Appendix B to NPF-42 states, "The need for a wildlife monitoring program which includes a general survey program for waterfowl collision events be accomplished."

Section 5.5.1.2 of Reference 1 states, "...given that the applicant has committed to monitoring wildlife use of the lake (ER-OL, Sec. 6.2.4.2), the staff recommends that general survey program for waterfowl collision events be incorporated into the proposed monitoring program to determine if mitigation is warranted." Section 6.2.4.2 of Reference 2 states, "Operational monitoring studies will be conducted annually for a minimum of two years following station start-up." Section 6.2.4.2 of Reference 2 also states, "...operational studies will include seasonal waterfowl and water bird censuses of the cooling lake...", and, "Since eagles are known to winter at John Redmond Reservoir, emphasis will be placed on determining eagle use of the cooling lake."

Further references focus on other areas of potential concerns regarding waterfowl and bald eagles. Section 2.2(d) of Appendix B states, "That in the event a serious disease problem involving waterfowl attributable to station operation occurs, the actions specified in the reference will be initiated..." Discussion on potential for waterfowl depredation on local agricultural crops and potential for disease outbreaks can be found in Section 5.5.1.1 of Reference 1. Section 4.1 of Appendix B also states "Any occurrence of an inusual or important event that indicates or could result in significant environmental impact causally related to plant operation shall be recorded and promptly reported to the NRC... examples: excessive bird impaction events, onsite plant or animal disease outbreaks, mortality or unusual occurrence of any species protected by the Endangered Species Act of 1973."

### R'SULTS OF MONITORING

Seasonal monitoring of waterfowl, waterbird, and bald eagle usage of the cooling lake has been conducted for each of the past eleven operational winters. Dead bird searches under transmission lines adjacent to where the lines crossed over the lake were discontinued after the first two operational winters. It was determined that the number of collisions occurring was insignificant when compared to the number of birds using the cooling lake. It was concluded that further dead bird searches would be unnecessary unless waterfowl usage increased significantly. Operational monitoring (including regularly scheduled waterfowl counts and casual observations of waterfowl flights in the vicinity of the transmission lines) of the cooling lake has shown no trends of increasing usage by waterfowl, waterbirds, or bald eagles. After the 1995-1996 monitoring season, WCNOC again modified the waterfowl monitoring program to discontinue waterfowl counts by WCNOC personnel.

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Waterfowl counts are currently conducted by Kansas Department of Wildlife and Parks personnel, and this data is obtained and reviewed by the WCNOC Environmental Management Department.

As noted earlier, two other potential concerns associated with large waterfowl concentrations are disease outbreaks and crop depredation. No disease outbreaks have been documented in the populations of waterfowl, waterbirds, or bald eagles using the cooling lake. There has been some localized crop depredation, but it has not been significant and has been primarily limited to cropland on owner-controlled property. Further, the larger concentrations of geese and mallards (Canada geese, snow geese and mallards are the species most likely to cause crop depredation problems, because of their feeding habits and the relatively high number of individuals) in the area typically utilize John Redmond Reservoir more often than Wolf Creek Lake.

# REQUIREMENT MET

Appendix B of NPF-42 required that a wildlife monitoring program be conducted for a minimum of two years following station start-up. This requirement has been met. Continued monitoring has further established that transmission line collision mortality is not a significant concern for waterfowl, waterbirds, or bald eagles using Wolf Creek Lake. Crop depredation has not been considered a problem in the area surrounding the lake. No disease outbreaks have been identified in the populations of waterfowl, waterbirds, or bald eagles utilizing the lake. For the aforementioned reasons, it has been determined that regularly scheduled seasonal monitoring is no longer required.

# FUTURE MONITORING

Future surveys and/or transmission line collision monitoring may be conducted by WCNOC staff if it appears that atypically high numbers of waterfowl or bald eagles are using Wolf Creek Lake. As required by Section 6.1c of Reference 1, any significant changes in waterfowl usage of Wolf Creek Lake that result in adverse environmental effects will be reported to the NRC.