



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
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NOV 06 2014

Ms. Cindy Blady
Chief, Rules, Announcements and Directives Branch (RADB)
Division of Administrative Services
Office of Administration Mail Stop 3 WFN-06-A44MP
U.S. Nuclear Regulatory Commission
Washington, DC 2055-0001

RE: Docket ID NRC-2014-0149

Dear Ms. Blady:

The U.S. Environmental Protection Agency (EPA) has reviewed the Nuclear Regulatory Commission's (NRC) Draft Environmental Impact Statement for an Early Site Permit (ESP) at the PSEG Site located adjacent to the existing Hope Creek Generating Station and Salem Generating Station in Lower Alloways Creek Township, Salem County, New Jersey (CEQ # 20140235). This review was conducted in accordance with Section 309 of the Clean Air Act and with the National Environmental Policy Act (NEPA).

The ESP is a Commission approval of a site or location for one or more nuclear power facilities. If approved, the site would be "banked" for up to 20 years, during which time a reactor type would be chosen, and a construction and operating license application submitted to the NRC. So, while the applicant, PSEG Nuclear, has not chosen a reactor type at this time, as part of the ESP the NRC must examine the impacts of both building and operating the hypothetical nuclear reactor(s) and associated facilities at the PSEG site. The design for such a hypothetical new plant was based upon nuclear reactor and power plant designs identified by the applicant in a plant parameter envelope. PSEG has also stated that an additional access road would be constructed to address future transportation and safety needs for the entire PSEG Site. This new three-lane causeway would be constructed on elevated structures for a 5-mile length through coastal wetlands.

The Draft EIS is thorough in its analysis of environmental impacts, however it provides insufficient information for us to make a reasonable judgment as to whether the proposed discharge will comply with the Clean Water Act Section 404(b)(1) guidelines. Approximately 134 acres of wetlands would be permanently impacted for the construction of the power block area, cooling tower area, the switch yard, and causeway.

Also, we cannot conclude, from the information provided in the DEIS, whether the proposed mitigation for this project will adequately compensate for the impacts described. The DEIS provides a brief list of potential candidate sites. Without an opportunity to review a

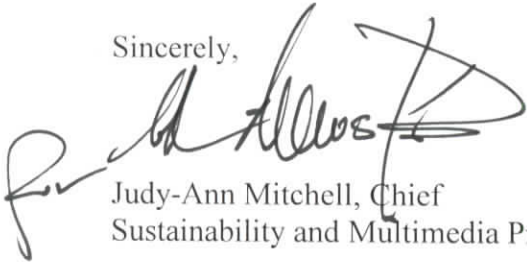
comprehensive mitigation plan for the project, we cannot determine that the proposed mitigation will be sufficient to compensate for the project's impacts. Therefore, EPA recommends that the Final EIS provide additional discussion of options for more fully avoiding and minimizing wetland impacts, and mitigation plans for impacts that could not be avoided.

EPA also reminds the NRC that this project is within the Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE non-attainment area for the ozone National Ambient Air Quality Standard. Any Federal action within a non-attainment area must undergo a general conformity applicability analysis (see 40 CFR 93.153) to ensure that the action will not (1) cause or contribute to any new violation of any air quality standard, (2) increase the frequency or severity of any existing violation of any air quality standard, or (3) delay timely attainment of any standard or any required interim emission reductions or other milestones in any area. While the NRC will not authorize any construction under the ESP, please note that a General Conformity Applicability Analysis will need to be performed when the combined license to construct a new reactor is evaluated by the Commission staff.

In light of our concerns on the project's impacts to wetlands and the related mitigation needs, EPA has rated the DEIS as "EC-2", meaning that EPA review identified environmental impacts that if avoided, would more fully protect the environment. (See enclosed rating sheet).

Thank you for the opportunity to comment. If you have any questions regarding this review or our comments, please contact Lingard Knutson of my staff at (212) 637-3747.

Sincerely,

A handwritten signature in black ink, appearing to read "Judy-Ann Mitchell". The signature is stylized and written over a horizontal line.

Judy-Ann Mitchell, Chief
Sustainability and Multimedia Programs Branch

Enclosure