



PECO NUCLEAR

A Unit of PECO Energy

Nuclear Group Headquarters
200 Exelon Way
Kennett Square, PA 19348

October 11, 2000

Mr. Michael McCarthy
U.S. Fish and Wildlife Service
Pennsylvania Field Office
315 South Allen Street
Suite 322
State College, PA 16801

SUBJECT: Peach Bottom Atomic Power Station, Units 2 and 3
License Renewal: Request for Information on
Threatened or Endangered Species

Dear Mr. McCarthy:

PECO Energy Company (PECO Energy) is preparing an application to the U.S. Nuclear Regulatory Commission (NRC) to renew the operating licenses for Peach Bottom Atomic Power Station (PBAPS) Units 2 and 3. Current operating licenses for the two-unit plant expire in 2013 and 2014. The renewal term would be for an additional 20 years beyond the original license expiration date. As part of the license renewal process, the NRC requires license applicants to "assess the impact of the proposed action on threatened or endangered species in accordance with the Endangered Species Act" (10 CFR 51.53). The NRC will also request an informal consultation with your office at a later date under Section 7 of the Endangered Species Act. By contacting you early in the application process, we hope to identify any issues that we need to address or any information that we should provide to your office to expedite the NRC consultation.

PECO Energy has operated PBAPS and an associated transmission line since 1974. The facility is located on the west bank of Conowingo Pond in York County, Peach Bottom Township, approximately 3 miles north of the Pennsylvania-Maryland line (see attached map). Only one new transmission corridor was required to integrate PBAPS into PECO Energy's bulk power system when the facility was constructed. This transmission line, from Peach Bottom to the Keeney Substation in Delaware, is the only transmission line/corridor under review during this license renewal process.

The *Final Environmental Statement related to operation of Peach Bottom Atomic Power Station Units 2 and 3* (FES) prepared in 1973 by the U.S. Atomic Energy Commission stated that three Federally-listed species occurred historically in the general vicinity of the Peach Bottom site, but suggested that one of these species, the Delmarva Peninsula fox squirrel, had been extirpated locally:

License Renewal: Request for Information on
Threatened or Endangered Species
October 11, 2000
Page 2

“The American peregrine falcon, southern bald eagle, and Delmarva Peninsula fox squirrel (a sub-species are on the Endangered Species List of the Department of Interior and were once found throughout the site area. Isolated occurrences may still be a possibility, although the Delmarva Peninsula fox squirrel is thought to be... extinct in Pennsylvania and the breeding sites of the peregrine falcon in eastern Pennsylvania have apparently not been in use since 1959.”

The FES also contained a letter from the Department of Interior (dated December 1, 1972) suggesting that the bog turtle should be added to the list of threatened and endangered species potentially occurring on the site.

As you know, the peregrine falcon was de-listed in August 1999 (Federal Register/Vol. 64, No. 164/August 25, 1999). It is our understanding that the Delmarva Peninsula fox squirrel (exclusive of some translocated and experimental populations) is found only on the Eastern Shore of Maryland. Based on our preliminary review of PECO Energy documents and the U.S. Fish and Wildlife Service web site (<http://endangered.fws.gov/wildlife.html>), we believe that two listed species, the threatened bald eagle (*Haliaeetus leucocephalus*) and the threatened (northern) bog turtle (*Clemmys muhlenbergii*), could occur in the vicinity of the Peach Bottom site or its associated transmission line.

Habitat suitable to the bog turtle does not occur on the Station site, however, the transmission line does cross streams and low areas. To determine if any of the habitat along the transmission corridor was suitable for bog turtles, PECO Energy conducted a survey of the corridor using the Fish and Wildlife Service Guideline for Bog Turtle Surveys, dated August 30, 2000 as guidance. The purpose of this survey was to determine whether or not the wetland(s) are potential bog turtle habitat. The survey determined that streams along the transmission corridor traverse upland habitats and lack wetlands adjacent to them. With a single exception, there are no swamps, bogs, marshes, marshy meadows, springs, or seeps within the corridor. The single exception is a small marshy area that is dominated by the exotic mile-a-minute weed (*Polygonum perfoliatum*). Hydrology and vegetation suitable for bog turtle habitat does not exist in this area. In addition, hydrology, soils, and vegetation suitable as bog turtle habitat do not exist at any location within the Keeney corridor.

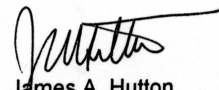
PECO Energy is committed to the conservation of significant natural habitats and protected species, and expects that operation of PBAPS, including maintenance of the identified transmission line, through the license renewal period (an additional 20 years) would not adversely affect any listed species. PECO Energy has no plans to alter current operations over the license renewal period. Any maintenance activities necessary to support license renewal would be limited to previously disturbed areas. No additional land disturbance is anticipated in support of license renewal.

Please do not hesitate to call Robert Matty at (610) 765-5514 if you have any questions or require any additional information. After your review, we would appreciate receiving your input by December 1, 2000, detailing any concerns you may have about any listed species or critical habitat in the area or confirming PECO Energy's conclusion that operation of

License Renewal: Request for Information on
Threatened or Endangered Species
October 11, 2000
Page 3

PBAPS over the license renewal term would have no effect on any threatened or endangered species. This will enable us to meet our application preparation schedule. PECO Energy will include a copy of this letter and your response in the Environmental Report that will be submitted to the NRC as part of the PBAPS license renewal application.

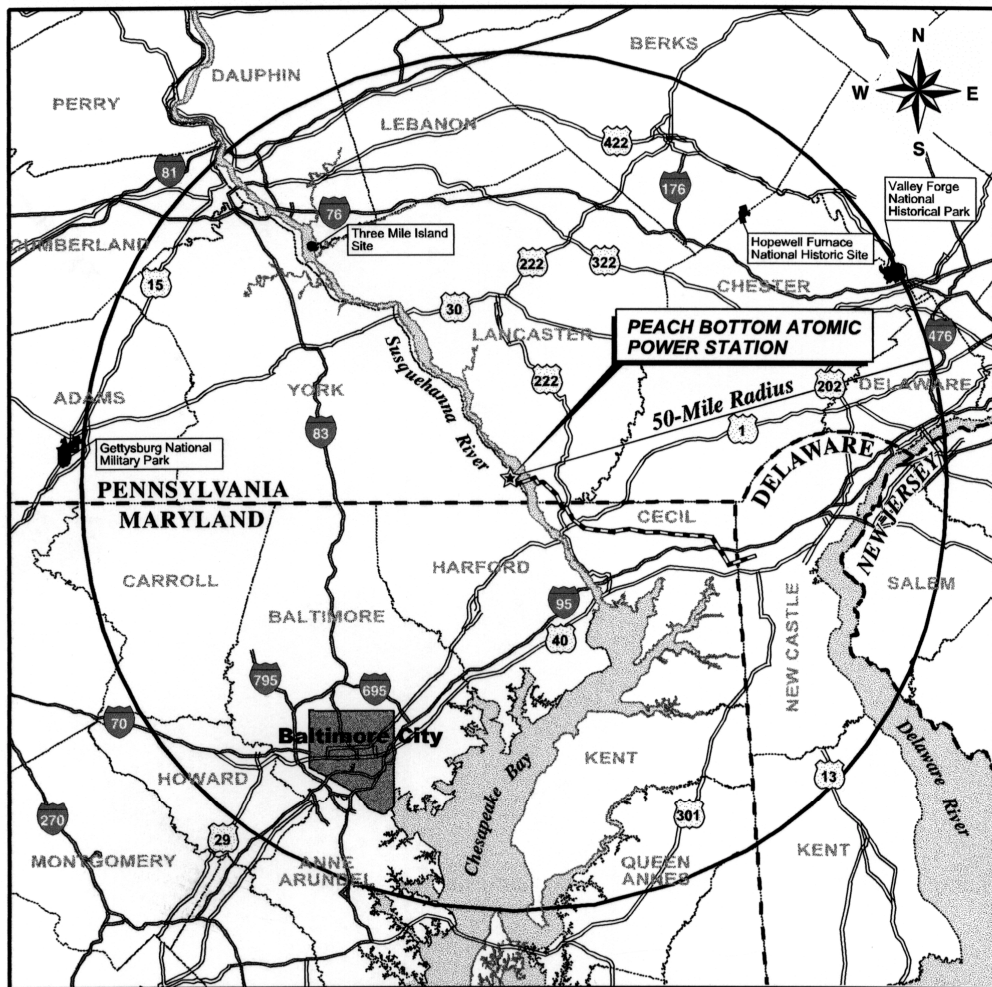
Sincerely,



James A. Hutton
Director - Licensing

Enc: Map of PBAPS and vicinity.
Holtwood, Wakefield, Conowingo, Rising Sun, Bay View, Elkton, Newark West
Quadrangle Maps with Keeney transmission corridor highlighted

cc K. Patterson, Tetra Tech NUS
F. Polaski, PECO Energy
W. Maher, PECO Energy



P:\Utility\Peach Bottom\Grfx\consult_figs\Fg 2 PECO 50 MILE.ai

LEGEND

- ★ Peach Bottom Atomic Power Station
- Transmission Line

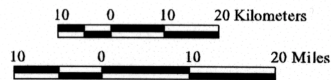


FIGURE 2. Peach Bottom Atomic Power Station 50-Mile Vicinity Map.



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Pennsylvania Field Office
315 South Allen Street, Suite 322
State College, Pennsylvania 16801-4850

October 18, 2000



JAMES A. HUTTON
LICENSING SECTION
OCT 25 2000
REFER TO:

James A. Hutton
Director - Licensing
Peco Energy Company
Nuclear Group Headquarters
200 Exelon Way
Kennett Square, PA 19348

Dear Mr. Hutton:

This responds to your letter of October 11, 2000, requesting information about federally listed and proposed endangered and threatened species within the area affected by the proposed license renewal for the Peach Bottom Atomic Power Station (Units 2 and 3) located in Peach Bottom Township, York County, Pennsylvania. The following comments are provided pursuant to the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*) to ensure the protection of endangered and threatened species.

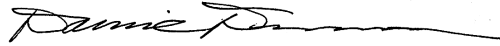
Except for occasional transient species, no federally listed or proposed threatened or endangered species under our jurisdiction are known to occur within the project impact area. Therefore, no Biological Assessment or further Section 7 consultation under the Endangered Species Act will be required with the Fish and Wildlife Service. Should project plans change, or if additional information on listed or proposed species becomes available, this determination may be reconsidered. A compilation of certain federal status species in Pennsylvania is enclosed for your information.

This response relates only to endangered or threatened species under our jurisdiction based on an office review of the proposed project's location. No field inspection of the project area has been conducted by this office. Consequently, this letter is not to be construed as addressing potential Service concerns under the Fish and Wildlife Coordination Act or other authorities.

Requests for information regarding State-listed endangered or threatened species should be directed to the Pennsylvania Game Commission (birds and mammals), the Pennsylvania Fish and Boat Commission (fish, reptiles, amphibians and aquatic invertebrates), and the Pennsylvania Department of Conservation and Natural Resources (plants).

Please contact Michael McCarthy of my staff at 814-234-4090 if you have any questions or require further assistance.

Sincerely,



David Densmore
Supervisor

Enclosure

**FEDERALLY LISTED AND PROPOSED SPECIES
THAT NO LONGER OCCUR IN PENNSYLVANIA**

<u>COMMON NAME</u>	<u>SCIENTIFIC NAME</u>	<u>STATUS**</u>	<u>FORMER DISTRIBUTION</u>
<u>MAMMALS</u>			
Canada lynx	<i>Lynx canadensis</i>	PT	north-central PA (Tioga Co.)
Delmarva Peninsula fox squirrel	<i>Sciurus niger cinereus</i>	E	mature forests of southeastern PA (Delaware and Chester Co.)
Eastern cougar	<i>Felis concolor couguar</i>	E	state-wide
Grey wolf	<i>Canis lupus</i>	E	state-wide
<u>MOLLUSKS</u>			
Dwarf wedge mussel*	<i>Alasmidonta heterodon</i>	E	Delaware River drainage
Fanshell*	<i>Cyprogenia stegaria</i>	E	Ohio River drainage
Orange pimpleback*	<i>Plethobasus striatus</i>	E	Ohio River drainage
Pink mucket pearly mussel*	<i>Lampsilis abrupta</i>	E	Ohio River drainage
Ring pink mussel*	<i>Obovaria retusa</i>	E	Ohio River drainage
Rough pigtoe*	<i>Pleurobema plenum</i>	E	Ohio River drainage
<u>INSECTS</u>			
American burying beetle	<i>Nicrophorus americanus</i>	E	state-wide
Karner blue butterfly	<i>Lycaeides melissa samuelis</i>	E	pine barrens, oak savannas (wild lupine habitat) (Wayne Co.)
Northeastern beach tiger beetle	<i>Cicindela dorsalis dorsalis</i>	T	along large rivers in southeastern PA
<u>PLANTS</u>			
Eastern prairie fringed orchid	<i>Platanthera leucophaea</i>	T	wet prairies, bogs (Crawford Co.)
Sensitive joint-vetch	<i>Aeschynomene virginica</i>	T	freshwater tidal marshes of Delaware river (Delaware and Philadelphia Co.)
Virginia spiraea*	<i>Spiraea virginiana</i>	T	along Youghiogheny River (Fayette Co.)
Smooth coneflower	<i>Echinacea laevigata</i>	E	serpentine barrens (Lancaster Co.)

Revised 11/18/99

* It is possible that remnant populations of some of these species (indicated with an *) may still occur in Pennsylvania, however, there have been no confirmed sightings of these species for over 70 years.

** E = Endangered, T = Threatened, PT = Proposed Threatened

The following is a partial list of additional species that no longer occur in Pennsylvania: moose, bison, wolverine, passenger pigeon, Bachman's sparrow, greater prairie-chicken, olive-sided flycatcher, Bewick's wren, eastern tiger salamander, blue pike, butterfly mussel, Diana fritillary butterfly, precious underwing moth, deertoed mussel, marbled underwing moth, cobblestone tiger beetle, mountain clubmoss, crested yellow orchid, red milkweed, American barberry, small white lady's-slipper, etc.

U.S. FISH AND WILDLIFE SERVICE

FEDERALLY LISTED, PROPOSED AND CANDIDATE SPECIES (in Pennsylvania)

<u>COMMON NAME</u>	<u>SCIENTIFIC NAME</u>	<u>STATUS*</u>	<u>DISTRIBUTION</u>
<u>FISHES</u>			
Shortnose sturgeon**	<i>Acipenser brevirostrum</i>	E	Delaware River & other Atlantic coastal waters
<u>REPTILES & AMPHIBIANS</u>			
Bog turtle	<i>Clemmys muhlenbergii</i>	T	Current - Adams, Berks, Bucks, Chester, Cumberland, Delaware, Franklin, Lancaster, Lebanon, Lehigh, Monroe, Montgomery, Northampton and York Counties. Historic - Crawford, Mercer and Philadelphia Counties
Eastern massasauga rattlesnake	<i>Sistrurus catenatus catenatus</i>	C	Current - Butler, Crawford, Mercer and Venango Counties. Historic - Allegheny and Lawrence Counties.
<u>BIRDS</u>			
Bald eagle	<i>Haliaeetus leucocephalus</i>	T	Suitable habitats across the state. Recent nesting in Butler, Centre, Chester, Crawford, Dauphin, Erie, Forest, Huntingdon, Lancaster, Mercer, Northumberland, Pike, Tioga, Venango, Warren and York Co. Wintering concentrations occur near ice-free sections of rivers, lakes and reservoirs, including the Delaware River.
Piping plover	<i>Charadrius melodus</i>	E	Presque Isle (Erie County). Migratory. No nesting in Pennsylvania since mid-1950s.
<u>MAMMALS</u>			
Indiana bat	<i>Myotis sodalis</i>	E	Winter hibernacula: Armstrong, Blair, Lawrence, Luzerne, Mifflin and Somerset Co.
<u>MOLLUSKS</u>			
Dwarf wedgemussel	<i>Alasmidonta heterodon</i>	E	Current - Delaware River watershed; Wayne County. Historic - Delaware River watershed; Bucks, Carbon, and Philadelphia Counties; Susquehanna River watershed; Lancaster County
Clubshell mussel	<i>Pleurobema clava</i>	E	French Creek and Allegheny River watersheds; Clarion, Crawford, Erie, Forest, Mercer, Venango and Warren Counties
Northern riffleshell	<i>Epioblasma torulosa rangiana</i>	E	French Creek and Allegheny River watersheds; Clarion, Crawford, Erie, Forest, Mercer, Venango and Warren Counties
<u>PLANTS</u>			
Northeastern bulrush	<i>Scirpus ancistrochaetus</i>	E	Current - Adams, Bedford, Blair, Carbon, Centre, Clinton, Cumberland, Dauphin, Franklin, Huntingdon, Lackawanna, Lehigh, Lycoming, Mifflin, Monroe, Perry, Snyder and Union Counties. Historic - Northampton County
Small-whorled pogonia	<i>Isotria medeoloides</i>	T	Current - Centre and Venango Counties. Historic - Berks, Chester, Greene, Monroe, Montgomery and Philadelphia Counties

* E = Endangered, T = Threatened, PE = Proposed Endangered, PT = Proposed Threatened, C = Candidate

Revised 7/27/00

** Shortnose sturgeon is under the jurisdiction of the National Marine Fisheries Service

U.S. FISH AND WILDLIFE SERVICE
315 SOUTH ALLEN ST., SUITE 322, STATE COLLEGE, PA 16801