Paula:

Thank you for your Response dated February 4, 2022.

However, I remain unclear about your Response to Issues #27.I have submitted several follow-up inquires. I have previously offered testimony to the Susquehanna River Basin Commission (“Commission” or “the SRBC”) relating to the Peach Bottom case study .(1)

Water shortages on the Lower Susquehanna reached critical levels in the summer of 2002. For the month of August 2002, 66 of 67 Pennsylvania counties had below normal precipitation On August 9th, 2002, Governor Schweiker extended the drought emergency for 14 counties across Southcentral and Southeast Pennsylvania. Precipitation deficits at or exceeding 10.0 inches were recorded in several counties, included Dauphin County.

The greatest deficit of 14.6 inches was in Lancaster County, and departures from normal precipitation range included 0.0 inches in York County Peach Bottom is located in Lancaster and York Counties while Three Mile Island is situated in Dauphin and Lancaster Counties. (2)

Peach Bottom did not “conserve” water until the plant was forced close to address a massive fish kill. On August 30, 2002, high differential pressures on the circulating water intake screens forced the manual shut down of Peach Bottom. “The problem was caused by a sudden surge in the amount of fish (Gizzard Shad) that entered the intake canal and clogged the screens. Unit 3 power was returned to 100 percent following cleaning of the circulating water screens and restating of the 3’A’ circulating water pump.” (3)]

In this instance fish kills, not water management, modified nuclear plant operations during a drought. While you state there are no exemptions, there are no enumerated criteria or priorities. Of course this begs the question: “What criteria does the SRBC use during a drought to manage and restrict water use for large volume consumers?”

“...the Susquehanna is declared to be one of the most flood-

prone river systems in the nation, the historical frequency of

droughts indicates that it is also highly prone to drought, with

droughts occurring throughout the 1990s and several times thus

far this decade (SRBC 2007a).” (5)

“To summarize, the SRBC is one of the few watershed commissions

that have direct control, through regulation, to control consumptive

use during drought conditions, and consumptive users, including

power plants, are required to compensate the SRBC for releases

from lakes and reservoirs needed to replenish flows to maintain

the river system. **There seems to be no priority established**

**within the SRBC program as to which users would be**

**required to reduce use first; the program seems to apply**

**equally to all large-volume consumptive users (consuming**

**water in excess of 20,000 gallons per day over a 30-day**

**average). (Bold face type added)** (6)

1) If there are no exemptions during a drought, what criteria does the SRBC utilize during a drought to manage and restrict water use for large volume consumers?

2) What is the trip wire at which nuclear power plants must reduce power during a drought?

3) What is the water temperature at which nuclear power plants must reduce power during a drought?

4) Does the SRBC have a Memorandum of Understanding with PJM to establish and gauge if water restrictions would impact electric capacity or customer service?

5) Does the SRBC have an Memorandum of Understanding with the Public Utility Commission to establish and gauge if water restrictions would impact electric capacity or customer service?

Respectfully submitted,

Eric Epstein

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1 “Three Mile Island Alert, Inc.’s Comments on the Susquehanna River Basin Commission’s Draft Comprehensive Plan for the Water Resources of the Susquehanna River Basin,” August 18, 2008.

2 Source: Pennsylvania Department of Environmental Protection, *Drought Report* and *Drought Conditions Summary*, August-September, 2002).

3 Source: Nuclear Regulatory Commission, IR-50-277/02-05; 50-278/02- 05).

“Peach Bottom-2 & 3 were documented last summer returning water to the River at temperatures in excess of 110 degrees. Communities and ecosystems that depend on limited water resources are also adversely affected by exiting nuclear stations. “ (TMI-Alert, 2003.)

5 “Impact of Drought on U.S. Steam Electric Power Plant

Cooling Water Intakes and Related Water Resource

Management Issues,” DOE/NETL-2009/1364 , April 2009, p. 28.

6 “Impact of Drought on U.S. Steam Electric Power Plant

Cooling Water Intakes and Related Water Resource Management Issues,” DOE/NETL-2009/1364 ,April 2009, p. 29.