To: Casto, Greg[Greg.Casto@nrc.gov]
Cc: Zobrist, Marcus[Zobrist.Marcus@epa.gov]
From: Houlihan, Damien
Sent: Mon 7/20/2015 1:24:05 PM
Subject: RE: RE: Pilgrim and EPA / NRC review processes

Thanks, Greg. I look forward to meeting in a few weeks.

Damien

From: Casto, Greg [mailto:Greg.Casto@nrc.gov]
Sent: Thursday, July 16, 2015 5:00 PM
To: Houlihan, Damien
Cc: Zobrist, Marcus
Subject: RE: RE: Pilgrim and EPA / NRC review processes

Thanks Damien,

This is very helpful to work from in defining our role in the overall process. We are working on this now, and should be ready to meet in the next couple of weeks. In the next meeting, I'd like to do a better job with providing an (NRC senior mgt) approved and workable final plan forward, so we will work to that end.

Thanks again, and please call if you have specific questions in advance. Tx greg

Greg Casto

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(301)415,0565

From: Houlihan, Damien [mailto:houlihan.damien@epa.gov]
Sent: Thursday, July 16, 2015 11:04 AM
To: Casto, Greg
Cc: Zobrist, Marcus; Webster, David; Curley, Michael; Papadopoulos, George
Subject: [External_Sender] RE: Pilgrim and EPA / NRC review processes

Greg –

See attached memo, as previously discussed, that outlines the NPDES process (generally) from draft to finalization, and also includes some specific question related to nuclear safety concerns raised by Entergy with regard to certain potential Best Technology Available (BTA) options under consideration.

We look forward to discussing this memo with you and others at NRC in the near future. I'll be in touch to set something up.

Please feel free to call with questions. Thanks.

Damien Houlihan, Chief

Industrial Permits Section

Office of Ecosystem Protection

US EPA

617 918-1586

From: Casto, Greg [mailto:Greg.Casto@nrc.gov]
Sent: Tuesday, May 19, 2015 11:04 AM
To: Houlihan, Damien
Cc: Zobrist, Marcus
Subject: RE: Pilgrim and EPA / NRC review processes

Damien,

Just following up for scheduling our next meeting. I've been thinking on how we can push this forward on our end, and believe that if we have the template examples for how EPA envisions a pre-draft permit consultation, and a post- draft permit consultation, then we can use those to provide to our senior management with our recommended definition for 'conflict' and how that will interface with the consulting process. Given that approval, then we may be able to proceed.

I believe that from the last meeting, your staff got an understanding of where we might consider alternatives within our understanding of 'conflict', given our regulatory process. After the meeting, we discussed this further among our group and we ended up with a common picture of how that definition could generally work with licensee justifications, and how they would enhance those justifications from the current example provided by Pilgrim.

If we had the templates in advance of the next meeting, then we should be able to talk to those and work through an example using Pilgrim. That should help our explanation to senior management to get acceptance and/or comments on our path forward. Feel free to call if questions or to discuss path forward. Tx greg

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From: Houlihan, Damien [mailto:houlihan.damien@epa.gov]
Sent: Tuesday, April 14, 2015 8:48 AM
To: Casto, Greg
Subject: RE: Pilgrim follow-up

Good morning, Greg.

Looking forward to our call at 2:30 today. I've attached a draft agenda based on what you proposed in earlier email and some follow up from our meeting in January. Let me know if it's o.k. and I can then circulate to you and EPA folks. Thanks.

Damien

From: Casto, Greg [mailto:Greg.Casto@nrc.gov]
Sent: Friday, April 10, 2015 1:32 PM
To: Houlihan, Damien
Subject: RE: Pilgrim follow-up
Importance: High

We are firm for our Tuesday meeting at 230P. We will have the following on the call:

Myself

Tim Collins – senior technical regulatory expert

Fred Lyons – project manager for site specific licensing activities

Dave Beaulieu (bow-yer) – senior 10 CFR 50.59 expert

Brian Harris – environmental area related technical reviewer

Andrew Pessin – general counsel (or either Susan Uttal or Daniel Straus, OGC. They were all at the January meeting)

Call in information is below:

Ex. 6 - Privacy pass code Ex. 6 - Privacy

If issues crop up, and you can't get me in the office, my cell is Ex. 6 - Privacy. Tx greg

Greg Casto

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From: Houlihan, Damien [mailto:houlihan.damien@epa.gov]
Sent: Wednesday, April 08, 2015 10:36 AM
To: Casto, Greg
Subject: RE: Pilgrim follow-up

Thanks, Greg. We're are confirmed for Tuesday, 4/14, from 2:30 – 4.

We'll be calling in, so we will need to arrange conferencing. Thanks.

Damien

From: Casto, Greg [mailto:Greg.Casto@nrc.gov]
Sent: Wednesday, April 08, 2015 9:51 AM
To: Houlihan, Damien
Subject: RE: Pilgrim follow-up
Importance: High

Just making sure that you know our meeting has been postponed to Tuesday at 230p here at the NRC. This will be a firm meeting and we should discuss what will be needed to support travel by EPA R1 staff (conf call). Tx greg

From: Casto, Greg
Sent: Tuesday, April 07, 2015 11:45 AM
To: 'Houlihan, Damien'
Subject: RE: Pilgrim follow-up
Importance: High

Sorry, left you a voice message to try to not continue to go back and forth on the

date/time. I'm having some people who would be beneficial to have at the meeting not able to attend on Thursday, but they could attend next week. Give me a call or respond by email. We should be able to do Tuesday, 230 – 4p (rest of week does not look good for most). I would propose to make the next week meeting firm (and can do so on my end). Sorry again, and let me know. Tx greg

From: Houlihan, Damien [mailto:houlihan.damien@epa.gov]
Sent: Monday, April 06, 2015 11:40 AM
To: Casto, Greg
Subject: RE: Pilgrim follow-up

Hi Greg –

We have conflicts on Wednesday. Let's do Thursday 1-2:30. Thanks.

Damien

From: Casto, Greg [mailto:Greg.Casto@nrc.gov]
Sent: Monday, April 06, 2015 11:36 AM
To: Houlihan, Damien
Subject: RE: Pilgrim follow-up
Importance: High

Damien,

Please let me know when you can whether the Wednesday afternoon meeting day/time work. If not, then we could make it the same time on Thursday. Tx greg

From: Houlihan, Damien [mailto:houlihan.damien@epa.gov]
Sent: Thursday, April 02, 2015 3:03 PM
To: Casto, Greg
Subject: RE: Pilgrim follow-up

Thanks, Greg. What you propose looks great.

I'm out tomorrow. Let's try for early next week. I'm pretty available. From EPA we'll include myself, George Papadopoulos, Dave Webster, and hopefully Marcus Zobrist (from HQ). Possibly include our attorney, Mark Stein.

If you could send me some potential times, I'll coordinate with EPA folks.

Damien

From: Casto, Greg [mailto:Greg.Casto@nrc.gov]
Sent: Thursday, April 02, 2015 10:31 AM
To: Houlihan, Damien
Subject: RE: Pilgrim follow-up
Importance: High

Sorry, I just saw this. I was out until yesterday, and am out again this afternoon. I am in tomorrow and currently next week. I'll work on an early next week meeting with people to talk on the following specific to Pilgrim, if this works for you:

1) Discussion on the 10 CFR 50.59 process relative to applying to crafting Pilgrim permitting questions

a. Overview of 50.59 and NEI 96-07 information

b. Examples where current permitting responses (from Pilgrim) appear to fit and do not appear to fit 50.59 approach

2) Re- discussion for areas where the EPA has permitting questions

a. Review of July 2014 request letter and initial request

b. Agreement of definition for 'conflict with an NRC safety requirement'

c. Recommended requests for further information to accommodate informational needs to perform consultation

d. Discuss NRC perception of what may be needed for future consultation (ie – what information we'd expect to be able to conclude a 'conflict')

3) Discussion of EPA proposed approach to interface with Pilgrim, and identify anything else needed for discussion or investigation for future meetings

Let me know if this looks like the right direction, and feel free to propose anything different or additional. I'm not sure this could be completed in an hour, but we could try. Suggest no more than a 90 minute bite for this meeting. I think that our outcome for this meeting would be to give you an understanding of the kind of documentation that we would need to see to conclude a 'conflict' exists. Tx greg

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From: Houlihan, Damien [mailto:houlihan.damien@epa.gov]
Sent: Thursday, March 26, 2015 7:32 AM
To: Casto, Greg

Cc: Zobrist, Marcus; Webster, David
Subject: RE: Pilgrim follow-up

Thanks, Greg. Let's set something up for next week. If you could send me some proposed times, I'll coordinate with other EPA folks.

Damien

From: Casto, Greg [mailto:Greg.Casto@nrc.gov]
Sent: Wednesday, March 25, 2015 4:35 PM
To: Houlihan, Damien
Cc: Zobrist, Marcus; Webster, David
Subject: RE: Pilgrim follow-up

Thanks Damien. Sorry but I am out of the office until next Tuesday. We have been working to schedule our next physical meeting (to further work on the action items from the January meeting) and it appears that the week of April 20th will be the next opportunity. I'll be able to call mid to late next week to generally discuss questions you might have on 50.59 and other options for Pilgrim. Let me know and we can set that up if you like. Tx greg

From: Houlihan, Damien [mailto:houlihan.damien@epa.gov]
Sent: Wednesday, March 25, 2015 2:28 PM
To: Casto, Greg
Cc: Zobrist, Marcus; Webster, David
Subject: RE: Pilgrim follow-up

Hi Greg –

I'm wondering if you have any time to touch base tomorrow? It could be a quick check-in where we can discuss status and next steps. Please let me know. Thanks.

Damien

From: Casto, Greg [mailto:Greg.Casto@nrc.gov]
Sent: Monday, March 16, 2015 4:30 PM
To: Houlihan, Damien
Cc: Zobrist, Marcus; Webster, David
Subject: RE: Pilgrim follow-up

Thanks, and we have done work on these topics since the meeting, but it was about a month ago. I'm getting with the other NRC meeting attendees now on recent work on this. I am probably not available this week to discuss in detail, so I'd say next week would be a good target to generally re-visit the bullets. Another overall follow-up meeting might be possible the following week, I'll need to check with our participants. To discuss Pilgrim path forward specifically, that might be able to happen as early as next week, but again I'd need to check with the staff. Tx greg

From: Houlihan, Damien [mailto:houlihan.damien@epa.gov]
Sent: Monday, March 16, 2015 3:30 PM
To: Casto, Greg
Cc: Zobrist, Marcus; Webster, David
Subject: Pilgrim follow-up

Hi Greg –

I wanted to follow-up with you on the consultation process for the Pilgrim draft NPDES permit. As you know, we continue to work on selecting the CWA 316(b) best technology available for the facility, and we believe working with NRC is a very important part of the process in terms of determining whether a technology is "available."

Specifically, I'm wondering about items c, d, and e from you 1/16 email to Marcus. They're listed below:

c. NRC will further deliberate on how our processes may be adapted to support EPA's desire to consult with us. (As example, B. above)

d. NRC will consider whether it can issue a letter to Pilgrim requesting additional information on why certain technologies conflict with NRC safety requirements. (more discussion internally on this in progress, but appears to be in conflict with OMB policy if Pilgrim does not formally send correspondence to NRC, as no apparent direct basis for fee recovery)

e. NRC will review Pilgrim's assertion to EPA that certain technologies conflict with NRC safety requirements. We informed EPA that our initial review indicated there was insufficient information for NRC to make a conclusion one way or the other. However, NRC would come prepared to discuss conceptually our views on Pilgrim's assertions. We were very clear that any perspectives provided would not constitute official NRC positions. (Will use work on (b) above to see how it applies to Pilgrim. Believe that at a minimum, will result in basis for EPA follow up questions to Pilgrim that will illicit better regulatory based justification for conflicts.)

Would you be available for a call this week to discuss? Please let me know if you have any availability. Thanks.

Damien

Damien Houlihan, Chief

Industrial Permits Section

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