ATTACHMENT 4

U.S. NUCLEAR REGULATORY COMMISSION

ENVIRONMENTAL STANDARD REVIEW PLAN

OFFICE OF NUCLEAR REACTOR REGULATION

5.3.3.2 TERRESTRIAL ECOSYSTEMS

REVIEW RESPONSIBILITIES

Primary—Appendix B

Secondary—Appendix B

I. AREAS OF REVIEW

This environmental standard review plan (ESRP) directs the staff's identification and evaluation of impacts to terrestrial ecosystems induced by the operation of heat dissipation systems, especially cooling towers and cooling ponds. The scope of the review directed by this plan will be limited to consideration of the operational aspects of heat dissipation systems in sufficient detail to form a basis for assessing potential operational impacts.

Review Interfaces

The reviewer for this ESRP should obtain input from or provide input to reviewers for the following ESRPs, as indicated:

- ESRP 2.4.1. Obtain descriptive material on the terrestrial ecology of the site and vicinity to support the analyses made in ESRP 5.3.3.2.

- ESRP 3.4.2. Obtain specific information about the cooling system necessary to assess impacts to the terrestrial environment.

- ESRP 5.3.3.1. Obtain information about heat dissipation to the atmosphere necessary to determine impacts to the terrestrial environment.

- ESRP 5.10. Provide a list of measures and controls to limit adverse impacts to terrestrial biota that are to be evaluated in regard to the licensing process and a list of applicant commitments to limit these impacts.

- ESRP 6.5.1. If potential adverse impacts due to heat-dissipation are predicted, then provide preoperational baseline monitoring program elements.

- ESRP 9.4.1. Provide a list of adverse environmental impacts that could be mitigated or avoided through use of alternative heat dissipation system designs or operational procedures, and assist in determining appropriate alternatives.

- ESRP 10.1. Provide a summary of the unavoidable impacts to terrestrial ecosystems that are predicted to occur as a result of operation of heat-dissipation systems.

- ESRP 10.2. Provide a summary of irreversible and irretrievable commitments of terrestrial biota that are predicted to occur as a result of the operation of heat-dissipation systems.

Data and Information Needs

The type of data and information needed will be affected by site- and station-specific factors, and the degree of detail should be modified according to the anticipated magnitude of the potential impacts. The following data or information should be obtained:

- concentration and chemical composition of dissolved and suspended solids in cooling tower basins or spray canals on a seasonal basis (from ESRP 3.4.2)

- isopleths of deposition at ground levels on a seasonal basis. Isopleths should extend to values at least as low as 1 kg/ha/mo (from the environmental report [ER] and ESRP 5.3.3.1).

- a list and description of the “important” terrestrial species and habitats that may be affected by the heat-dissipation system (from ESRP 2.4.1)

- descriptions of natural and managed plant communities on the site and within offsite isopleths above 20 kg/ha/yr (from ESRPs 2.4.1, 5.3.3.1, and the site visit)

- annual precipitation and its dissolved solid concentration within the drift field (from the ER)

- prediction of increased frequency and distribution of fog and icing (from ESRP 5.3.3.1)

- shoreline vegetation expected to develop along the shore of new cooling lakes and ponds (from the ER and consultation with Federal, State, and local agencies)

- proposed other uses of cooling ponds and reservoirs (from the ER).

II. ACCEPTANCE CRITERIA

Acceptance criteria for the review of impacts on terrestrial ecosystems from the heat dissipation system are based on the relevant requirements of the following:

- 10 CFR 51.45 with respect to ERs and the analysis of potential impacts contained therein

- 10 CFR 51.75 with respect to analysis of impacts on the terrestrial environment affected by the issuance of a construction permit

- 10 CFR 52, Subpart A, with respect to analysis of impacts on the terrestrial environment affected by the issuance of an early site permit

- 10 CFR 51.95 with respect to the preparation of supplemental environmental impact statements (EISs) in support of the issuance of an operating license

- Endangered Species Act of 1973, as amended, with respect to identifying threatened or endangered species and critical habitats and formal or informal consultation with the U.S. Fish and Wildlife Service and/or National Marine Fisheries Service

- Fish and Wildlife Coordination Act of 1958 with respect to consideration of fish and wildlife resources and the planning of development projects that affect water resources

Regulatory guidelines and specific criteria to meet the regulations and identified above are as follows:

- Regulatory Guide 4.2, Rev. 2, *Preparation of Environmental Reports for Nuclear Power Stations* (NRC 1976), contains guidance for the preparation of ERs. With respect to the heat-dissipation system, it specifies that detailed descriptions of the expected effects of the system on the local environment with respect to fog, icing, precipitation modifications, humidity changes, cooling-tower blowdown and drift, and noise should be included in the ER. The reviewer should ensure that the appropriate data and analyses are provided in the ER.

- Regulatory Guide 4.7, Rev. 2, *General Site Suitability for Nuclear Power Stations* (NRC 1998), contains guidance on factors that should be considered in the site-selection process. In specific regard to cooling-tower drift, this guide states “The potential loss of important terrestrial species and other resources should be considered.”

- Regulatory Guide 4.11, Rev. 1, *Terrestrial Environmental Studies for Nuclear Power Stations* (NRC 1977), contains technical information for the design and execution of terrestrial environmental studies, the results of which may be appropriate for inclusion in the applicant’s ER. The reviewer should ensure that the appropriate results concerning potential effects of the heat-dissipation system on the terrestrial environment are included in the ER.

Technical Rationale

The technical rationale for evaluating the applicant's impacts from heat-dissipation systems to terrestrial ecosystems is discussed in the following paragraph:

> The EIS needs to include the results of an analysis that considers the environmental effects of the proposed heat dissipation system and the alternatives available for reducing or avoiding adverse environmental effects. Any environmental benefits that may result from the operation of the heat dissipation system should also be included. Following the acceptance criteria listed above will help ensure that the environmental impacts of the proposed heat-dissipation system are considered with respect to matters covered by such standards and requirements.

III. REVIEW PROCEDURES

The depth and extent of the input to the EIS will be governed by the environmental characteristics of the terrestrial ecology that could be affected by operation of the station's heat dissipation systems and by the magnitude of the expected impacts to the terrestrial environment.

The most apparent effects of heat dissipation systems on terrestrial ecosystems are those associated with cooling-tower or spray pond operation. These include the effects of vapor plumes, icing, and salt drift on the terrestrial ecosystems. The potential for bird collision with cooling towers should be addressed by the reviewer for ESRP 4.3.1. To date, at stations using once through cooling systems, no adverse impacts to terrestrial ecosystems have occurred that require mitigating actions. In circumstances where once through cooling is proposed, the analysis may terminate without further consideration unless unusual environmental circumstances make more analysis necessary.

(1) Consider the impacts of drift deposition on plants.

- Drift deposition has the potential for adversely affecting plants, but the tolerance levels of native plants, ornamentals, and crops are not known with precision.

- General guidelines for predicting effects of drift deposition on plants suggest that many species have thresholds for visible leaf damage in the range of 10 to 20 kg/ha/mo of NaCl deposited on leaves during the growing season.

- These effects can be altered by the frequency of rainfall, humidity, type of salt, and sensitivity of species.

- Use maps of the site and vicinity showing drift isopleths that were produced by recognized drift-dispersion models to define areas of possible botanical injury.

- Use an order-of-magnitude approach, as follows, to analyze operational impacts from salt drift:
    - Deposition of salt drift (NaCl) at rates of 1 to 2 kg/ha/mo is generally not damaging to plants.
    - Deposition rates approaching or exceeding 10 kg/ha/mo in any month during the growing season could cause leaf damage in many species.
    - Deposition rates of hundreds or thousands of kg/ha/yr could cause damage sufficient to suggest the need for changes of tower-basin salinities or a reevaluation of tower design, depending on the amount of land impacted and the uniqueness of the terrestrial ecosystems expected to be exposed to drift deposition.

(2) Consider the detrimental effects increased fogging could have on local vegetation if the increase in humidity induces an increase in fungal or other phytopathological infections. Increased icing can cause physical damage to vegetation due to increased structural pressure on tree branches or by damaging fruit or leaf buds.

- Use an order of magnitude approach as follows to analyze operational impacts from fog or ice:
    - Fogging or icing of vegetation on the order of a few hours per year is generally not severe.
    - Fogging or icing on the order of tens of hours per year may cause detectable damage to vegetation.
    - Fogging or icing occurring for hundreds of hours per year could be severe enough to suggest the need for design changes, depending on the amount of land impacted and the uniqueness of the terrestrial ecosystems expected to be exposed to drift deposition.
- Consider soil salinization:
    - The risk from this source is generally considered to be low.
    - In arid areas (deserts), salts could accumulate in soils over long time intervals and cause damage.

(3) Consider the impact to terrestrial biota when new shoreline habitats are created along ponds and reservoirs built for cooling purposes. Riparian tree/shrub communities that form around these new ponds or reservoirs may attract “important” species.

If endangered or threatened species could be affected, agency level formal or informal consultation with the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act is required.

IV. EVALUATION FINDINGS

Input to the EIS should accomplish the following objectives: (1) public disclosure of any expected impact to the terrestrial ecosystem as a result of the operation of the heat dissipation system, (2) presentation of the basis of staff analysis of the project, and (3) presentation of staff conclusions, evaluations, and conditions regarding terrestrial ecosystems. These conclusions should include

- a list of adverse impacts of cooling-system heat dissipation to terrestrial ecosystems
- a list of the impacts for which there are measures or controls to limit adverse impacts and associated measures and controls
- the applicant's commitments to limit these impacts
- the staff's evaluation of the adequacy of the applicant's measures and controls to limit adverse impacts.

This information should be summarized by the reviewer for ESRP 5.10.

Evaluation of impacts should result in one of the following conclusions:

- *The impact is minor, and mitigation is not warranted.* If the degree of impact falls into the first order category (a few hours of icing or fogging each year or a few kilograms of salt drift per hectare per year), the reviewer may conclude that these impacts are not of sufficient magnitude to warrant further evaluation.
- *The impact is adverse, but can be mitigated by design and procedure modifications*. If the degree of impact falls within the second-order category (a few tens of hours per year increase in fog or ice or a few tens of kilograms of salt drift deposition per hectare per year), the reviewer may conclude that the effects are adverse and that mitigating actions should be considered. For these cases, the reviewer should consult with the Environmental Project Manager (EPM) and the reviewer for ESRP 9.4.1 for verification that the modifications are practical and will lead to an improvement in the benefit-cost balance. The reviewer should prepare a list of verified modifications and measures and controls to limit the corresponding impact. These lists should be given to the reviewer for ESRP 5.10.
- *The impact is adverse and is of such magnitude that it should be avoided, if it cannot be mitigated.* If the degree of expected impacts falls within the third order category (hundreds of hours of increase in fog and ice or hundreds of kilograms of salt drift per hectare per year), the reviewer may conclude that the impacts of operation are sufficiently adverse that consideration of alternative designs or locations to avoid the impact is warranted. When impacts of this nature are identified, the reviewer should inform the EPM and the reviewer for ESRP 9.4.1 that an analysis and evaluation of alternative designs or procedures is needed. The reviewer should participate in any such analysis and evaluation of alternatives that would avoid the impact and that could be considered practical. If no

such alternatives can be identified, the reviewer should provide this conclusion to the reviewer for ESRP 10.1.

V. IMPLEMENTATION

The method described herein will be used by the staff in evaluating conformance with the Commission's regulations, except in those cases in which the applicant proposes an acceptable alternative for complying with specified portions of the regulations.

VI. REFERENCES

10 CFR 51.45, "Environmental report."

10 CFR 51.75, "Draft environmental impact statement—construction permit."

10 CFR 51.95, "Supplement to final environmental impact statement."

10 CFR 52, Subpart A, "Early Site Permits."

Endangered Species Act, as amended, 16 USC 1531 et seq.

Fish and Wildlife Coordination Act Amendment, 16 USC 661 et seq.

U.S. Nuclear Regulatory Commission (NRC). 1976. *Preparation of Environmental Reports for Nuclear Power Stations*. Regulatory Guide 4.2, Rev. 2, Washington, D. C.

U.S. Nuclear Regulatory Commission (NRC). 1977. *Terrestrial Environmental Studies for Nuclear Power Stations*. Regulatory Guide 4.11, Rev. 1, Washington, D. C.

U.S. Nuclear Regulatory Commission (NRC). 1998. *General Site Suitability for Nuclear Power Stations*. Regulatory Guide 4.7, Rev. 2, Washington, D. C.

during the licensing of the facility or the mechanisms of NPDES permitting and associated 316(a) and (b) determinations. They either were found acceptable or mitigated. For some plants with once-through cooling systems, the large volumes of water withdrawn, heated, and discharged back to the receiving water may cause adverse effects to fish and shellfish populations during the license renewal term. Because impacts of entrainment of fish and shellfish, impingement, and thermal discharge effects could be small, moderate, or large, depending on the plant, these are Category 2 issues for plants with once-through cooling systems. These issues will need to be analyzed in the supplemental NEPA document at the time of license renewal.

4.3 COOLING TOWERS

This section introduces cooling towers and their emissions (Section 4.3.1) and then evaluates the impacts of the emissions on surface water and groundwater (Section 4.3.2), aquatic ecology (Section 4.3.3), agricultural crops (Section 4.3.4), terrestrial ecology (Section 4.3.5, which also includes bird collisions with cooling towers), and human health (Section 4.3.6). Impacts of cooling-tower noise are also addressed (Section 4.3.7). Each section that evaluates impacts (Sections 4.3.2–4.3.7) provides a conclusion that defines the significance of the impacts. These conclusions are based on reviews of cooling-tower data available for towers at specific nuclear plants as well as for other cooling towers (e.g., those at coal-fired plants).

4.3.1 Introduction

Mechanical- and natural-draft wet cooling towers transfer waste heat to the atmosphere primarily by evaporating water. Natural-draft towers are generally up to 160 m (520 ft) in height, whereas mechanical-draft towers are generally less than 30 m (100 ft) tall (Roffman and Van Vleck 1974). Because of the large cooling capacity of natural-draft towers, only one such tower is required for each reactor unit; but two or more mechanical-draft towers are required for equivalent cooling.

Most of the water lost from a cooling tower escapes to the atmosphere as water vapor in the exhaust flow. About 10 percent of the vapor recondenses after release, forming the visible part of the plume leaving the tower (Golay et al. 1986). Drift droplets of cooling water are also entrained in the air stream inside the tower and escape directly into the atmosphere. A particulate solid drift material remains after droplet evaporation. The drift contains varying amounts of salts, biocides, and microorganisms.

Natural-draft towers release drift and moisture high into the atmosphere where they are dispersed over long distances. Local impacts are more likely to occur with mechanical-draft towers because the plume is not dispersed over as great an area. The visible moisture plume from a natural-draft cooling tower may be 20 to 30 percent longer than that from comparable mechanical-draft towers (Roffman and Van Vleck 1974). Icing of vegetation and roads can occur near mechanical draft towers when fog is present and temperatures are below freezing. Much of the drift eventually deposits on the earth. The atmospheric transport of drift and the amount of deposition to the earth has been estimated for most nuclear plants through the use of computer models. Actual measurements of drift deposition have been collected at only a few nuclear plants. These measurements indicate that, beyond about 1.5 km (1 mile) from nuclear plant cooling towers, salt deposition is not significantly above natural background levels.

4.3.2 Surface Water Quality and Use

Sections 4.3.2 and 4.3.3 review the past and ongoing impacts on aquatic resources caused by the operation of nuclear power plants with cooling towers. Any ongoing impacts will probably continue into the license renewal term because the cooling system design and operation will not change as a result of license renewal. Judgments about the significance of these issues during the license renewal terms are based on published information, agency consultation, and information provided by the utilities (Appendix F) applicable to every nuclear power plant in the United States. The conclusions drawn in Sections 4.3.2 and 4.3.3 apply to all nuclear power plants with cooling towers.

4.3.2.1 Water Use

Two factors may cause water-use and water-availability issues to become important for some nuclear power plants that use cooling towers. First, the relatively small rates of cooling water withdrawal and discharge allowed some power plants with cooling towers to be located on small bodies of water that are susceptible to droughts or competing water uses. Second, closed-cycle cooling systems evaporate cooling water, and consumptive water losses may represent a substantial proportion of the flows in small rivers. Loss of a substantial portion of flow from a small stream as a result of evaporative losses from a cooling tower will reduce the amount of habitat for fish and aquatic invertebrates. Off-stream water uses, such as power plant consumption, must be regulated to ensure that important in-stream uses, such as habitat for aquatic organisms, boating, angling, and waste assimilation, are not compromised.

Consumptive water use can adversely impact riparian vegetation and associated animal communities by reducing the amount of water in the stream that is available for plant growth, maintenance, and reproduction. Riparian vegetation is defined as streamside vegetation that is structurally and floristically distinct from adjacent upland plant communities (Taylor 1982). Riparian vegetation has important ecological functions; and its importance as a resource has been widely recognized and reviewed (e.g., Brinson et al. 1981; Johnson et al. 1985). Briefly, riparian vegetation stabilizes stream channels and floodplains. It influences biogeochemical cycles, water temperature and quality, and the duration and magnitude of flooding. Riparian vegetation also provides diverse cover, food, water, reproductive habitat, and migration corridors for many aquatic and terrestrial animals. As a result, riparian zones often support a wide variety and high density of wildlife (deer, small mammals, songbirds, raptors, reptiles, and amphibians), especially in arid or urbanized areas. Riparian vegetation may be adversely affected by dewatering in a number of ways (Taylor 1982), including decreases in the width of the riparian corridor, changes in species and community diversity, increased susceptibility to flooding, changes in tree canopy cover, lower tree basal area, and lower seedling densities. Impacts to wildlife occur as a direct or indirect result of degradation of riparian habitats. Such dewatering effects are most apparent in the arid and semi-arid West; in the eastern United States, dewatering effects generally involve more subtle changes in community composition because of the higher precipitation, humidity, and soil moisture and the lower water stress conditions that prevail.

Limerick Generating Station, located on the Schuylkill River at Pottstown, Pennsylvania, is an example of a plant with a closed-cycle cooling system that is subject to water availability constraints because of in-stream-flow requirements in a smaller river, controversy over water use related to interbasin transfer, competing water uses, and water-related agreements between utilities. Aquatic resource issues identified include (1) water quality and low-flow problems in the Schuylkill River; (2) water availability conflicts with downstream water users; (3) increased in-stream flow requirements, particularly with respect to continuing efforts to improve the water quality of the Schuylkill River and to reintroduce American shad into the river; and (4) concerns over saltwater movement upstream in the Delaware River as the result of upstream water use (Margaret A. Reilly, letter to G. F. Cada, ORNL, Oak Ridge, Tennessee May 24, 1990; D. T. Guise, letter to G. F. Cada, ORNL, Oak Ridge, Tennessee, July 3, 1990).

Limerick is in one of the fastest growing regions in Pennsylvania, which is experiencing heavy residential development and water demands for domestic, existing industrial, and developing industrial uses (Joseph Hoffman, letter to V. R. Tolbert, ORNL, Oak Ridge, Tennessee, August 27, 1990). Limerick is permitted to withdraw up to 13 percent of the minimum flow of the Schuylkill River and a major portion of the flow of Perkiomen Creek for cooling tower makeup. Only 5 percent of the 1.8–2.0 m^3/s (65–70 ft^3/s) withdrawn from the Schuylkill River when the flow is greater than 15 m^3/s (530 ft^3/s) is returned to the river. This loss of in-stream flow is viewed as a significant contribution to the water quality and low-flow problems in the Schuylkill River (Dennis T. Guise, letter to G. F. Cada, ORNL, Oak Ridge, Tennessee, July 3, 1990). This water-use issue may be exacerbated as efforts to reintroduce the American shad into the Schuylkill River continue. In addition to the water use from the Schuylkill River, 2 m^3/s (71 ft^3/s) of water is diverted from the Delaware River to the East Branch of Perkiomen Creek via the Point Pleasant Diversion at a rate of 2 m^3/s (71 ft^3/s); this interbasin transfer affects the achievement of the 85 m^3/s (3000 ft^3/s) minimum flow objective in the Delaware River at Trenton. The effects of the diversion are being debated through an NPDES permit appeal before the Pennsylvania Environmental Hearing Board (Dennis T. Guise, letter to G. F. Cada, ORNL, Oak Ridge, Tennessee, July 3, 1990).

The Palo Verde NGS offers another example of competing water uses that may affect continued operation of nuclear facilities that use cooling towers. Palo Verde currently uses treated effluent from the cities of Phoenix and Tolleson for cooling tower makeup water. The blowdown from the cooling towers discharges to on-site lined evaporation ponds [Arizona Public Service Company response to NUMARC survey (NUMARC 1990)]. In the absence of the power plant, part of the municipal effluent would be used for commercial purposes and the remainder discharged to the Gila River, where it would be used for groundwater recharge, irrigation, and support of riparian habitat (Jack Bale, letter to G. F. Cada, ORNL, Oak Ridge, Tennessee, May 31, 1990). According to the Arizona Game and Fish Department (Donald Turner, Arizona Game and Fish Department letter to G. F. Cada, ORNL, Oak Ridge, Tennessee, June 29, 1990), if Palo Verde uses all of its allocation, the flow from the Gila River downstream to Gillespie Dam will be reduced, the water tables will drop significantly, and aquatic habitat and riparian vegetation will be destroyed. Sixty-nine percent of the water flowing in the Gila and Salt rivers downstream from the Ninety-First Avenue treatment plant is discharged by the treatment plant. Most if not all of the water produced by the treatment plant is committed to Palo Verde. When all three units of the plant were operating, flow in the river was significantly reduced, pools and ponds dried up, and numerous fish die-offs occurred (Donald Turner, Arizona Game and Fish Department, letter to G. F. Cada, ORNL, Oak Ridge, Tennessee, June 29, 1990).

Nuclear facilities on small bodies of water may experience water-use constraints related to availability. For example, during temporary drought periods, power plants with cooling towers may have to curtail operations if evaporative water losses exceed the capacity of small, multiple-use source bodies of water. Byron Station in Illinois withdraws water from the Rock River to supply natural-draft cooling towers. By agreement with the Illinois Department of Conservation, the withdrawal for makeup is limited to 3.5 m^3/s (125 ft^3/s) and net water consumption is limited to no more than 9 percent of the flow below 19 m^3/s (679 ft^3/s) [Commonwealth Edison Company response to NUMARC survey (NUMARC 1990)]. Duane Arnold Energy Center on the Cedar River in Iowa uses mechanical-draft cooling towers for condenser cooling and could also experience water availability constraints. The state of Iowa Department of Natural Resources currently has no water-use concerns with operation of Duane Arnold (Larry J. Wilson, letter to G. F. Cada, ORNL, Oak Ridge, Tennessee, May 22, 1990); however, the plant may possibly experience future constraints on the availability of water for consumptive use, because the surface water withdrawals within the state are projected to increase by 19 percent from 1985 to 2005 (Thamke 1990). Within Linn County, where Duane Arnold is located, water use is also projected to increase (Brian Tormee, telephone interview with V. R. Tolbert, ORNL, Oak Ridge, Tennessee, September 4, 1990).

Consultations with regulatory and resources agencies indicate that water use conflicts are already a concern at two closed-cycle nuclear power plants (Limerick and Palo Verde) and may be a problem in the future at Byron Station and the Duane Arnold Energy Center. Because water use conflicts may be small or moderate during the license renewal period, this is a Category 2 issue for nuclear plants with closed-cycle cooling systems. Related to this, the effects of consumptive water use on in-stream and riparian communities could also be small or moderate, depending on the plant, and is also a Category 2 issue.

4.3.2.2 Water Quality

Although cooling towers are considered to be closed-cycle cooling systems, concentration of dissolved salts in the makeup water—which results from evaporative water loss—requires the discharge of a certain percentage of the mineral-rich stream (blowdown) and its replacement with fresh water (makeup). The quantities of blowdown are relatively small compared with the discharges from once-through systems, typically on the order of 10 percent. Water quality impacts could occur from the elevated temperatures of the blowdown or from the concentration and discharge of chemicals added to the recirculating cooling water (to prevent corrosion and biofouling, regulate pH, etc.). A unit of water may reside in the cooling circuit for 3 to 20 cycles before being lost to evaporation or released in the blowdown stream (Coutant 1981). The concentration of total dissolved solids in the cooling tower blowdown averages 500 percent of that in the makeup water, a concentration factor that can be tolerated by most freshwater biota (ORNL/NUREG/TM-226). Dilution of the low-volume blowdown by the receiving water also reduces water quality impacts of heat and contaminants discharged from closed-cycle cooling systems.

Because of strict regulation of chemical discharges from steam-electric power plants (e.g., EPA regulations per 40 CFR Part 423), water treatment systems for cooling tower blowdown have been developed. Many of these systems recapture chemical additives for recycling in the cooling system (Coutant 1981). As noted in Section 4.2, all nuclear power plants are required to obtain an NPDES permit to discharge effluents. These permits are renewed every 5 years by the regulatory agency, either EPA or, more commonly, the state's water quality permitting agency. The periodic NPDES permit renewals provide the opportunity to require modification of power plant discharges or to alter discharge monitoring in response to water quality concerns. Utility responses to the NUMARC survey (Table F.2) indicate that such changes have been made during the plants' operation to correct water quality problems.

Impacts of cooling tower discharges are considered to be of small significance if water quality criteria (e.g., NPDES permits) are not consistently violated. In considering the effects of closed-cycle cooling systems on water quality, the staff evaluated the same issues that were evaluated for open-cycle systems (Table 4.1): altered current patterns, altered salinity gradients, temperature effects on sediment transport capacity, altered thermal stratification of lakes, scouring from discharged cooling water, eutrophication, discharge of chlorine and other biocides, discharge of other chemical contaminants, and discharge of sanitary wastes. Based on review of literature and operational monitoring reports, consultations with utilities and regulatory agencies, and comments on the draft GEIS, discharge of cooling tower effluents has not been a problem at existing nuclear plants. Although occasional violations of NPDES permits have occurred at many plants (e.g., minor spills), water quality impacts have been localized and temporary. Effects are considered to be of small significance for all plants. Cumulative impacts to water quality would not be expected because the small amounts of chemicals released by these low-volume discharges are readily dissipated in the receiving waterbody. No change in operation of the cooling system is expected during the license renewal term, so no change in effects of cooling towers discharges on receiving water quality is anticipated. Effects of cooling tower discharges could be reduced by operating additional wastewater treatment systems, or by reducing the plant's generation rate. However, because the effects of cooling tower discharges on water quality are considered to be impacts of small significance and because the changes would be costly, the staff does not consider the implementation of these potential mitigation measures to be warranted. Effects of cooling tower discharges on water quality are all Category 1 issues.

4.3.3 Aquatic Ecology

Cooling towers have been suggested as mitigative measures to reduce known or predicted entrainment and impingement losses (see, for example, Barnthouse and Van Winkle 1988). The relatively small volumes of makeup and blowdown water needed for closed-cycle cooling systems result in concomitantly low entrainment, impingement, and discharge effects (see Section 4.2.2 for a more complete discussion of these effects regarding once-through cooling systems). Studies of intake and discharge effects of closed-cycle cooling systems have generally judged the impacts to be insignificant (NUREG/0720; NUREG/CR-2337). None of the resource agencies consulted for this GEIS (Appendix F) expressed concerns about the impacts of closed-cycle cooling towers on aquatic resources.

However, even low rates of entrainment and impingement at a closed-cycle cooling system can be a concern when an unusually important resource is affected. Such aquatic resources would include threatened or endangered species or anadromous fish that are undergoing restoration. For example, concern about potential impacts of the Washington Nuclear Project (WNP-2) on chinook salmon has been raised by the Washington Department of Fisheries (Cynthia A. Wilson, Washington Department of Fisheries, letter to G. F. Cada, ORNL, Oak Ridge, Tennessee, July 5, 1990). Although entrainment, impingement, and thermal discharges are not believed to be a problem at WNP-2, the importance of the Columbia River salmon stocks are such that the resource agency feels that monitoring should continue. Similarly, the Pennsylvania Fish Commission has expressed concern about future entrainment and impingement of American shad by the Limerick Generating Station, the Susquehanna Steam Electric Station, Three Mile Island Nuclear Station, and Peach Bottom Atomic Power Station (Dennis T. Guise, Pennsylvania Fish Commission, letter to G. F. Cada, ORNL, Oak Ridge, Tennessee, July 3, 1990). In all cases, losses of American shad at these power plants are minimal or nonexistent, but periodic monitoring has been recommended to ensure that no future problems occur as the anadromous fish restoration efforts continue.

It is unlikely that the small volumes of water withdrawn and discharged by closed-cycle cooling systems would interfere with the future restoration of aquatic biota or their habitats. Effects of operation of closed-cycle cooling systems on aquatic organisms are considered to be of small significance if changes are localized and populations in the receiving waterbody are not reduced. In considering the effects of closed-cycle cooling systems on aquatic ecology, the staff evaluated the same issues that were evaluated for open-cycle systems (Table 4.1): impingement of fish and shellfish, entrainment of fish and shellfish early life stages, entrainment of phytoplankton and zooplankton, thermal discharge effects, cold shock, effects on movement and distribution of aquatic biota, premature emergency of aquatic insects, stimulation of nuisance organisms, losses from predation, parasitism, and disease, gas supersaturation of low dissolved oxygen in the discharge, and accumulation of contaminants in sediments or biota. Based on reviews of literature and operational monitoring reports, consultations with utilities and regulatory agencies, and comments on the draft GEIS, these potential effects have not been shown to cause reductions in the aquatic populations near any existing nuclear power plants. None of the regulatory and resource agencies expressed concerns about the cumulative effects on aquatic resources of closed cycle cooling system operations at this time, although some recommended continued monitoring in view of efforts to restore fish populations. Effects of all of these issues are considered to be of small significance for all plants. No change in operation of the cooling system is expected during the license renewal term, so no change in effects of cooling towers on aquatic biota is anticipated. Effects of entrainment, impingement, and discharges from closed-cycle cooling systems could be reduced by reducing the plant's generation rate, or by operating additional wastewater treatment systems. However, because the effects of cooling tower withdrawals and discharges on aquatic organisms are considered to be impacts of small significance and because the changes would be costly, the staff does not consider the implementation of these potential mitigation measures to be warranted. The effects of closed-cycle cooling system operation on aquatic biota are all Category 1 issues.

4.3.4 Agricultural Crops and Ornamental Vegetation

The issue addressed by this section is the extent to which the productivity of agricultural crops near nuclear plants may be reduced by exposure to salts or other effects (e.g., icing, increased humidity) resulting from cooling-tower operation. The approach to evaluating this issue was as follows: first, based on a literature review, potential impacts of salts in general (whether from cooling towers or other sources such as wind-blown salts near seashores) are described according to the rate of salt deposition to earth and the relative sensitivity of different types of crops (Section 4.3.4.1); then, the data generated by monitoring programs at a representative subset of specific nuclear plants were reviewed (Section 4.3.4.2). The subset includes 10 of the 11 nuclear power plants with mechanical-draft cooling towers. Mechanical-draft towers are the focus of this section because impacts of drift deposition and icing are more likely to occur near these towers than at natural-draft towers. Drift from natural-draft towers is released at greater heights, disperses more widely, and therefore deposits on earth at lower rates or concentrations. Data were also found and reviewed for 8 of the 17 plants with natural-draft cooling towers (Table 4.1). The coal-fired Chalk Point Plant was also included in the analysis because extensive monitoring of cooling-tower-drift effects has been conducted there and because this plant uses brackish water for cooling and represents a case with comparatively high potential for drift impacts from natural-draft towers. The only nuclear plant that has a natural-draft tower and uses brackish water for cooling is Hope Creek in New Jersey. It is included among the plants that were reviewed.

The following standard of significance is applied to the effects of cooling tower operation on agricultural crops and ornamental vegetation. The impact is of small significance if under expected operational conditions measurable productivity losses (either quantity or quality of yield) do not occur for agricultural crops; and measurable damage (either visual or to plant function) does not occur for ornamental vegetation.

4.3.4.1 Overview of Impacts

4.3.4.1.1 Ambient Salts and Cooling-Tower Drift

Agricultural crops can be affected by chemical salts and biocides in cooling tower drift and drift-induced or plume-induced ice formation. Increased fogging, cloud cover, and relative humidity resulting from cooling-tower operation have little potential to affect crops, and adverse effects have not been reported. Generally, drift from cooling towers using fresh water has low salt concentrations and, in the case of mechanical draft towers, falls mostly within the immediate vicinity of the towers (ANL/ES-53), representing little hazard to vegetation off-site. Typical amounts of salt or total dissolved solids in freshwater environments are around 1000 ppm (ANL/ES-53). In arid environments, competition for water resources can result in the use of relatively low-quality or saline water for cooling, and the potential for drift-induced damage to surrounding vegetation may be greater (McBrayer and Oakes 1982). For example, source water for cooling at Palo Verde in Arizona is withdrawn from an onsite reservoir containing treated sewage effluent of relatively high salinity. As a result, cooling tower basin water also had high salinity levels including 10,000 to 26,000 ppm total dissolved solids, 3,400 to 7,000 ppm Cl^-, and 2,700 to 8,600 ppm Na^+ (NUS-5241). High salt levels also occur at plants on the coasts or coastal bays. Brackish cooling water used by the Chalk Point coal-fired plant in Maryland contained 11,000 to 26,000 ppm total soluble salts and 6,600 to 18,000 ppm Cl^- (Mulchi and Armbruster 1983). Nuclear plants with cooling towers use fresh water, except for the Hope Creek Plant in New Jersey, which uses saline water. At the Crystal River Plant, Florida, which currently uses brackish water in once-through cooling, a helper cooling tower has been constructed to cool water in a canal that receives discharge from five fossil and one nuclear units.

Talbot (1979) has concluded that adequate estimates of natural background levels of atmospheric salt loading (naturally occurring drift) and rates of deposition thereof are not available for points remote from oceans. In field measurements at a wet cooling tower, A. Backhaus et al. (1988) estimated that up to 60 percent of the chemical contents in the sample came from atmospheric aerosols and not from the tower. Therefore, observed deposition is not all drift from cooling towers (Talbot 1979). Recent work (ORNL/TM-11121) has quantified background aerosol deposition for a dozen sites throughout the country, but deposition for most locations remains poorly known.

Salts from cooling towers are deposited on vegetation by (1) wind-driven impaction, (2) droplet and particulate fallout, and (3) rainfall (Talbot 1979; CONF-740302, 1975b). In high-salt environments such as a windy seashore, impaction is usually the most important process, delivering 10 times more salt to vegetation than does fallout. Increasing wind speeds and salt concentrations increase impaction, hence increasing vegetation injury (Talbot 1979). In most humid environments, rainwater will wash off salts deposited on vegetation (ANL/ES-53), but exposure can be significant during periods between rainfalls.

4.3.4.1.2 Effects of Salt Drift

Plants damaged by salt drift may have acute symptoms, including necrotic or discolored tissue, stunted growth, or deformities (Talbot 1979; Hoffman et al. 1987). Chronic effects are less obvious but may include some degree of chlorosis and reduced growth (Talbot 1979) or increased susceptibility to disease and insect damage (Hosker and Lindberg 1982).

Climatic conditions affect plants' ability to tolerate salt (Talbot 1979; Maas 1985). The degree of injury is related to the salt content in the leaves, but hot or dry weather conditions and water stress are critical in inducing injury (most crops can tolerate greater salt stress during relatively cool and humid weather) (Maas 1985).

Among the factors that affect the plant's foliar accumulation of salt are physical characteristics of the leaves (Maas 1985; CONF-740302, 1975d; Taylor 1980), type and concentration of salt, ambient temperature and humidity, and length of time the leaf remains wet (Maas 1985). Because salt on foliage is apparently absorbed from solution, high humidity, which retards evaporation, enhances salt uptake (CONF-740302, 1975d; McCune et al. 1977; Talbot 1979; Grattan et al. 1981). Because precipitation and dew affect salt deposition, uptake, and resultant injury, dose exposure is difficult to predict (Talbot 1979; Grattan et al. 1981; McCune et al. 1977; EPA-600/3-76-078).

Plant species and crop varieties vary significantly in their tolerance to drift deposition and to soil salinity (Talbot 1979; Maas 1985). In general, salt uptake, plant injury, and reduction in crop yield have been shown to increase with increasing levels of airborne salt or deposition and with time of exposure (CONF-740302, 1975b; Mulchi and Armbruster 1981; Maas; Grattan et al.; EPA-600/3-76-078). Some plants, however, have shown a slight increase in vegetative productivity [e.g., tobacco at < 4 kg/ha (3.6 lb/acre) per week (Mulchi and Armbruster 1983) and cotton at 8 kg/ha (7 lb/acre per week) (Hoffman et al. 1987)]. Based on experimental exposures, a yield reduction of 10 percent has been estimated for deposition levels as low as 4.7 kg/ha (4.2 lb/acre) per week to corn, a species sensitive to foliar salt injury (Mulchi and Armbruster 1981). Relationships between experimental levels of salt deposition, foliar concentrations of sodium and chloride, and corn yield show that yield may be slightly reduced even at rates as low as 2 kg/ha (1.8 lb/acre) per week (Mulchi and Armbruster 1981). Also, bush beans can have reduced yield depending on the age of plants, with older plants being most sensitive (EPA-600/3-76-078). Deposition rates near nuclear-plant towers, according to available deposition data (Section 4.3.5.1.2), appear to be generally below the rates that would affect sensitive agricultural crops.

Talbot (1979) tabulated salt deposition amounts known to induce acute toxicity symptoms in vegetation (Table 4.2). Corn was the most sensitive crop, showing injury above 1.8 kg/ha (1.6 lb/acre) per week; the least sensitive was pinto beans, showing injury above 253 kg/ha (226 lb/acre) per week. Armbruster and Mulchi (1984) showed that foliar salt deposition of 3.2 to 8.8 kg/ha (2.9 to 7.9 lb/acre) per week increased foliar chloride content and damaged foliage of corn, with the higher deposition reducing the yield of grain by as much as 11 percent. They found similar results for soybeans, with bean yields

Table 4.2 Estimates of salt-drift deposition rates estimated to cause acute injury to vegetation

Species	Deposition above which injury is expected (kg/ha/week)
Crops and ornamental plants	
Zea mays (corn)	1.82
Glycine hispida var York (soybean)	7.28
Gossypium hirsutum (cotton)	8.0
Medicago sativa (alfalfa)	15.7
Forsythia intermedia var spectabilis (forsythia)	189.6
Phaseolus vulgaris var Pinto (pinto bean)	252.8
Albizzia julibrissin rosea (mimosa)	379.2
Koelreutaria paniculata (golden rain tree)	568.8
Native species	
Cornus florida (flowering dogwood)	1.2 (in Maryland) 47.4 (in New York)
Fraxinus americana (white ash)	1.3 (in Maryland) 18.9 (in New York)
Tsuga canadensis (Canadian hemlock)	9.4
Pinus strobus (white pine)	189.6
Quercus prinus (chestnut oak)	379.2
Robinia pseudoacacia (black locust)	379.2
Acer rubrum (red maple)	474.0
Hammamelis virginiana (witch hazel)	1042.8

Source: Adapted from Talbot 1979 and Hoffman et al. 1987.
Note: To convert kg/ha to lb/acre, multiply by 0.8924.

reduced by as much as 7 percent at the highest deposition rate.

W. C. Hoffman et al. (1987) experimentally exposed cotton and cantaloupe in the arid environment near Palo Verde to foliar salt deposition rates of 8 to 415 kg/ha (7 to 370 lb/acre) per year total salt and alfalfa to depositions up to 829 kg/ha (740 lb/acre) per year. They found foliar injury in alfalfa only at the highest deposition level but no injury to cantaloupe or cotton despite increases in foliar Na^+ and Cl^-. Yields of cantaloupe and alfalfa were not reduced, but 415 kg/ha (370 lb/acre) per year reduced cotton boll production and seed cotton yield by approximately 25 percent.

The burning quality of tobacco is known to be adversely affected by elevated Cl^-. Experiments have shown that burning quality, or length of time the leaf will burn, is impaired by increasing experimental doses of salt deposition (Mulchi and Armbruster 1983). A 17 percent reduction in burning quality was estimated for a Cl^- deposition of 5 kg/ha (4.5 lb/acre) per week, based on regression relationships of deposition, leaf chloride concentration, and leaf burn (Mulchi and Armbruster 1983).

Field studies of the effects of salt drift have been conducted at the Turkey Point plant and the coal-fired Chalk Point plant. Hindawi et al. (EPA-440/5-86-001) investigated field exposures of bean and corn plants to saltwater drift from a test cooling tower and power spray module at the Turkey Point plant. Salt concentrations in tissues of bean and corn plants increased with time during three weeks of exposure and decreased exponentially with distance from the salt drift source. Some injury to leaves was visible at the site of greatest exposure.

The coal-fired Chalk Point plant has a relatively high potential impact from natural-draft cooling towers because brackish water is used for cooling. Other than the Hope Creek plant, all nuclear plants with natural-draft towers use fresh water for cooling. Deposition rates at Chalk Point were measured at 12 monitoring sites at distances of from 1.6 km to 9.6 km (1 to 6 miles) from the towers during their initial 5 years of operation (Mulchi et al. 1982). No increased deposition resulting from cooling-tower operation was detected at these distances. Deposition rates at the sites ranged from about 0.5 to 1.2 kg/ha (0.4 to 1 lb/acre) per month for NaCl, which comprises most of the solids in the brackish cooling water. Monitoring sites, which were established to study effects on agricultural crops, were not located in areas closer to the towers because no active cropland was in these areas and because the plant, located on a peninsula on the Patuxent River, is bounded by water except to the north and north-northwest. Most drift probably deposits in the river.

A study of tobacco plants 3 years after Chalk Point cooling towers began operating failed to find any increase in leaf salt content that could be attributed to drift (Mulchi and Armbruster 1983). Chloride levels in tobacco and chloride and sodium levels in corn and soybeans at 1.6 km (1 mile), the closest distance crops were grown to the Chalk Point towers, were within the range of preoperational values and were no higher than levels found up to 9.6 km (6 miles) from the towers (Mulchi et al. 1982; Mulchi and Armbruster 1983).

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4.3.4.1.3 Effects on Soils

Drift deposition also has the potential to damage vegetation by soil salinization. Soil salinization does not usually occur in areas where rainfall is sufficient to leach salts from the soil profile. In arid regions, however, such as at Palo Verde, cooling tower drift has the potential to increase soil salinity and thus affect native and agricultural plants (McBrayer and Oakes 1982). Salinity of irrigated soils in arid regions may also be increased by drift, even though such soils already have a high salinity resulting from salts in irrigation water and high evaporation rates. Responses of crop plants to soil salinity appear to be poorly correlated to their tolerance to foliar-applied salts (Grattan et al. 1981; Maas 1985).

In an experiment in a more humid environment, salts were applied to soils to simulate drift deposition from the Chalk Point coal-fired plant with brackish water cooling towers. One-time applications of 14–112 kg/ha (13–100 lb/acre) NaCl affected leaf Cl^- in corn and soybeans but resulted in no visible damage or reduction in yield (Armbruster and Mulchi 1984). These soil salt treatments also increased soil pH and extractable cations (Armbruster and Mulchi 1984), but leaching by winter precipitation returned soil to pretreatment status.

In humid environments, effects of drift deposition on soils appear transitory if they can be detected at all. Field measurements of the effects of the operating cooling towers at Chalk Point showed no changes in soil chemical elements at distances of 1.6 to 9.6 km (1 to 6 miles) (Mulchi et al. 1982). In a study of five saltwater cooling towers near Galveston Bay, Texas, salt deposition up to 746 kg/ha/year was found within 100 m (328 ft) of the towers, with levels decreasing to <52 kg/ha (46 lb/acre) per year at 434 m (1424 ft) (Wiedenfeld et al. 1978). Weekly deposition ranged from 4.27 kg/ha (3.81 lb/acre) per week to 58.8 kg/ha (52.5 lb/acre) per week. In the survey, salt content of the soil at 104 m (341 ft) from the towers returned to previous levels when towers were shut down during the winter.

4.3.4.2 Plant-Specific Operational Data

Annual reports of environmental monitoring for vegetation damage at nuclear plants were reviewed. Vegetation monitoring included detailed measurements of vegetation structure and composition on permanent plots, aerial infrared photography with subsequent field surveys for vegetation injury, or general surveillance. Vegetation damage ranging from foliar chlorosis to defoliation can be identified on false-color infrared aerial photographs (NUREG/CR-1231). Vegetation monitoring for drift effects has been conducted at 18 nuclear plants. Most of the nuclear plants are not located close to agricultural areas, but six of the plants monitored crops, pasture, orchards, or ornamental vegetation. None reported visible damage to ornamental vegetation or reduction in crop yield (Table 4.3).

A detailed study at Palo Verde in Arizona showed that, after 6 years of operation, no change in agricultural soils attributable to cooling tower emissions occurred. Although significant increases or decreases occurred in some soil parameters at some monitoring locations, these changes appear unrelated to cooling-tower operation and were believed to have been caused by irrigation management, cropping, and fertilizer application. At the conclusion of the 6-year study, no significant effects on

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Table 4.3 Results of nuclear facility monitoring for cooling-tower drift effects on terrestrial vegetation

Plant	Vegetation effects	Type of monitoring
	Natural draft	
Arkansas	No visible damage; no foliar chemical changes after one year	Aerial photography; foliar chemistry; orchard, native trees
Beaver Valley	No visible damage	Aerial photography; soil pH and conductivity; native vegetation
Byron	No visible damage	Aerial photography; crops; woody, ornamental, and native vegetation
Callaway	No visible damage	Aerial photography; permanent vegetation plots; native trees
Davis-Besse	No visible damage	Aerial photography; soil chemistry; native vegetation
Hope Creek	No visible damage after one year; no foliar chemical changes after one year	Ground survey; foliar chemistry; soil chemistry; native vegetation
Three Mile Island	No visible damage	Visual inspection; crops and native vegetation
Trojan	No visible damage	Aerial photography; pasture, ornamental and native vegetation
	Mechanical draft	
Catawba	Possible ice damage to loblolly pine < 61 m (200 ft) from towers	Aerial photography; ground survey; native trees
Duane Arnold	No visible damage	Visual inspection; native vegetation
Edwin I. Hatch	No visible damage	Aerial photography; permanent vegetation plots; native vegetation

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Table 4.3 (continued)

Plant	Vegetation effects	Type of monitoring
Joseph Farley	No visible damage	Aerial photography; native vegetation
Palisades	Severe ice damage < 61 m (200 ft) from towers; some icing beyond 250 m (820 ft); sulfate injury < 150 m (492 ft) from towers; change in vegetation caused by damage to trees	Aerial photography; permanent vegetation plots; native vegetation
Palo Verde	No visible damage; foliar salt concentrations increased on site	Aerial photography; foliar chemistry; soil chemistry; crops and native vegetation
Prairie Island	Frequent ice damage to oaks adjacent to towers; change in canopy structure caused by ice damage; reduced viability in acorns from oaks near towers	Aerial photography; ground survey; acorn viability survey; native vegetation
River Bend	No visible damage	Aerial photography; permanent vegetation plots; native vegetation
Fort Saint Vrain	No visible damage	Aerial photography; crops; native vegetation
Washington	No foliar chemical changes	Foliar chemistry; soil chemistry; native vegetation

crops or native vegetation had been noted, and the study was discontinued (Halliburton NUS 1992).

At the Palisades plant in Michigan, concern was expressed by owners of nearby fruit orchards about possible effects of elevated humidity on the incidence of disease, particularly apple scab, in their orchards. The concern was that increased humidity could result in the need for increased applications of disease-control sprayings and thus increase orchard operating costs. NRC staff recommended a survey program to assess impacts of cooling-tower moisture on yield, quality, and frequency of disease-control sprayings (NRC 1978). Weather conditions encouraging apple scab are temperatures of 17 to 24°C (63 to 75°F) and

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>85 percent relative humidity for 9 h or more. A study was conducted to determine these weather conditions near Palisades cooling towers and in more distant areas (Ryznar et al. 1980). Long-term weather records from weather stations outside the influence of the Palisades cooling towers were analyzed. In addition, a network of meteorological stations was established in the vicinity of the Palisades plant. No increase in weather occurrences favoring apple scab was observed that could be related to Palisades operation.

4.3.4.3 Conclusion

Monitoring results from the sample of nuclear plants and from the coal-fired Chalk Point plant, in conjunction with the literature review and information provided by the natural resource agencies and agricultural agencies in all states with nuclear power plants, have revealed no instances where cooling tower operation has resulted in measurable productivity losses in agricultural crops or measurable damage to ornamental vegetation. Because ongoing operational conditions of cooling towers would remain unchanged, it is expected that there would continue to be no measurable impacts on crops or ornamental vegetation as a result of license renewal. The impact of cooling towers on agricultural crops and ornamental vegetation will therefore be of small significance. Because there is no measurable impact, there is no need to consider mitigation. Cumulative impacts on crops and ornamental vegetation are not a consideration because deposition from cooling tower drift is a localized phenomenon and because of the distance between nuclear power plant sites and other facilities that may have large cooling towers. This is a Category 1 issue.

4.3.5 Terrestrial Ecology

This section addresses the impact of cooling tower drift on natural plant communities (Section 4.3.5.1) and the impact of bird mortality resulting from collisions with natural-draft cooling towers (Section 4.3.5.2).

4.3.5.1 Effects of Cooling-Tower Drift

This section addresses the extent to which natural plant communities near nuclear plants are affected by exposure to salts, icing, or other effects (e.g., fogging and increased humidity) caused by operation of cooling towers. The approach to evaluating this issue is the same as that used for evaluating the impact on agricultural crops in Section 4.3.4.

4.3.5.1.1 Overview of Impacts

The potential impacts of cooling tower operation on native vegetation are similar to those for agricultural crops, including salt-induced leaf damage, growth and seed yield reduction, and ice-induced damage (see Section 4.3.4). In addition, native vegetation may suffer changes in community structure (Talbot 1979) in response to ice damage or differences in species tolerances to drift. Increased fogging and relative humidity near cooling towers have little potential to affect native vegetation, and no such impacts have been reported.

The following standard of significance is applied to the effects of cooling tower operation on natural plant communities. The impact is of small significance if no measurable degradation (not including short-term, minor, and localized impacts) of natural plant communities results from cooling tower operation.