



MEMORANDUM

TO: Tom
FROM: Todd
DATE: June 27, 2000
RE: Pilgrim Nuclear Power Station 316(a),(b) Demonstration Report;
Plymouth

Pilgrim Nuclear Power Station (PNPS) is a 670 Mw power station located on the western shore of Cape Cod Bay in Plymouth. The Station uses once-through cooling, withdrawing water from and discharging water back into Cape Cod Bay just south of Plymouth-Kingston-Duxbury Bay.

As a condition for renewal of their NPDES permit, Entergy Nuclear Generation Company, owners and operators of the Pilgrim Nuclear Power Station (PNPS) in Plymouth, are required to demonstrate to the permitting agencies (USEPA and MADEP) that the coolant water withdrawal and coolant water discharge activities permitted at PNPS are not having adverse impacts on the species in the receiving water body and that the location, design, and capacity of the Cooling Water Intake Structures reflect the Best Technology Available for minimizing adverse impacts to the aquatic ecosystem.

EPA New England has asked MADEP, MADMF, NMFS, and MCZM to comment as to whether or not the Demonstration Report has adequately demonstrated that PNPS is not having an adverse impact on the species in Cape Cod Bay. I have completed my review of the Demonstration Report and recommend that MCZM not accept this Demonstration Report as adequate evidence that there is no impact on the aquatic life surrounding PNPS. Twenty-five years of data clearly show that millions of fish larva and eggs are destroyed by PNPS every year. PNPS has yet to show to the satisfaction of all members of the Technical Advisory Committee that these numbers represent an insignificant "taking" of the local populations.

cc: Susan Snow-Cotter