

February 12<sup>th</sup>, 2026

Bethany A. Kavulich, PE  
Pennsylvania Department of Environmental Protection  
Civil Engineer Manager, Hydraulic  
Waterways & Wetlands Program  
Southcentral Regional Office  
909 Elmerton Avenue  
Harrisburg, PA 17110

**Christopher M. Crane Clean Energy Center**  
**Application No. WQC2203225-001**  
**APS No. 1150951**

Dear Ms. Kavulich:

On November 21<sup>st</sup>, 2025, Christopher M. Crane Clean Energy Center (CCEC), Constellation Energy Generation, LLC (CEG) submitted a request to the Pennsylvania Department of Environmental Protection (PADEP) for a Section 401 Water Quality Certificate, or other appropriate documentation, such as a waiver. CEG subsequently received a letter from the PADEP dated December 18<sup>th</sup>, 2025, stating the application package was incomplete.

The letter provided a description of the items missing from the submission which must be included in the resubmittal of our application and/or the submission of additional information. Please refer to the list below in support of the request for additional information for the Section 401 Water Quality Certificate or waiver.

**Item #1 Request:** An Environmental Assessment Form was provided that references other sections of the application documents for each module, but is not consistent with the instructions of the Environmental Assessment. For example, the Environmental Assessment incorrectly states “restart activities and the resumption of power operations will not have any water obstruction(s), encroachment activities, or dams” when, at a minimum, maintenance dredging and modifications to the north bridge are proposed. Provide revisions to the Environmental Assessment to ensure that all modules are completed and are consistent with the instructions and appendices. The Environmental Assessment should discuss and quantify all potential impacts to waters of the Commonwealth associated with this project.

**Item #1 CEG Response:** Please see the enclosed document titled “Item 1 Response – Updated Forms and Enclosures” which contains the following information:

- Updated water quality certification application Crosswalk table
- Updated Environmental Assessment form

- Enclosure M, tables responsive to Module S3A regarding the impacts of dredging and bridge maintenance activities
- Enclosure N, the PA DEP dredging permit

**Item #2 Request:** Provide proof of coordination with the Pennsylvania Historical and Museum Commission.

**Item #2 CEG Response:** Please see the enclosed document titled “Item 2 Response – PHMC Correspondence” which contains the following information:

- PHMC Correspondence Included in the TMI-1 Initial License Renewal Environmental Report
- Three Mile Island - 1 Decommissioning Project Description and Summary of Cultural and Historic Resources Review
- First Energy - Substation Project Correspondence
  - Note – This correspondence is related to a project for First Energy and not for a CEG project. However, PA SHPO provided clarification in this letter that the portion of the project’s Area of Potential Effects (APE) that is located on Three Mile Island does not need a Phase I survey due to previous ground disturbance from past TMI operations.

**Item #3 Request:** A PNDI search for only the bridge modifications was provided. Provide a completed PNDI search for the entire project area along with proof of coordination with any resource agencies where a potential conflict is identified.

**Item #3 CEG Response:** Please see the enclosed document titled “Item 3 Response – PNDI and follow-up”.

**Item #4 Request:** A wetland memo from 2018 for the *Spent Fuel Storage Area* was provided. The memo is outdated and does not include the entire project area. Provide a revised wetland delineation report that includes the entire project area, is less than five years old, and includes completed data sheets, photos, and aerial mapping showing the extent of the investigation.

**Item #4 CEG Response:** CEG has not prepared a wetlands report for CCEC in the last five years. Much of the CCEC site is presently snow-covered. Wetlands delineations can be performed only during the growing season of any year. CEG will therefore delineate potential wetlands of the project area during late spring 2026, prepare the report, and submit to the PADEP no later than the end of August 2026.

In the meantime, to assist the PADEP with the Section 401 Water Quality Certification review, CEG is enclosing herewith a series of maps from the National Wetlands Inventory (NWI) tool developed by the US Fish and Wildlife Service (USFWS). See enclosed document titled “Item 4 Response – National Wetlands Inventory Maps”. NWI is a useful tool for preliminary planning purposes, but not necessarily appropriate for key decision making. The first enclosed map is a large-scale map that shows the entire CCEC site; the remaining eight are smaller-scale maps that provide greater detail. Resources in these maps are identified as freshwater emergent wetlands or freshwater ponds in NWI. Note that NWI can sometimes misclassify swales as emergent wetlands; these would be corrected or confirmed in the

delineation that will be conducted in the spring. Wetlands classification modifiers and notations from USFWS are also attached.

Per the NWI tool, there are freshwater emergent wetlands in the undeveloped portions of Three Mile Island. Planned project activities will only occur on previously disturbed land and therefore will not impact these resources.

Additionally, the following documents contain confidential information. CEG requests that these documents are not made publicly available:

- Enclosure K from the original submittal (TMI 1 Cultural Resource Protection Plan)
- Item 2 Response – PHMC Correspondence County and Township Municipal Notifications
- Item 3 Response – PNDI and follow-up PADEP Chapter 105 Environmental Assessment Form

Please contact Allison Stalker, Principal Environmental Specialist, at Allison.Stalker@constellation.com or (267-533-5338), if you have any questions about this submittal.

Sincerely,



2/11/26

Clint Six, Site Vice President  
Christopher M. Crane Clean Energy Center

Cc:

Zigmund Karpa, Director Environmental Programs  
Craig Smith, Regulatory Assurance Manager

Attachments (4):

1. Item 1 Response – Updated Forms and Enclosures
2. Item 2 Response – PHMC Correspondence County and Township Municipal Notifications
3. Item 3 Response – PNDI and follow-up PADEP Chapter 105 Environmental Assessment Form
4. Item 4 Response – National Wetlands Inventory Maps