US ERA ARCHIVE DOCUMENT

Comments Duke Wabash:

EPA: None

State: None

Company: See letter dated August 4, 2010.





**Duke Energy Corporation** 526 South Church St. Charlotte, NC 28202

Mailing Address: EC13K/PO Box 1006 Charlotte, NC 28201-1006

## Via E-Mail and Overnight Courier

August 4, 2010

Mr. Stephen Hoffman
US Environmental Protection Agency
Two Potomac Yard
2733 S. Crystal Drive
5<sup>th</sup> Floor, N-237
Arlington, VA 22202-2733

Re: Draft Dam Safety Assessment Report

Wabash River Generating Station

450 Bolton Road

West Terre Haute, Indiana 47801

Dear Mr. Hoffman:

Duke Energy Indiana, Inc. received and has reviewed the draft report for Wabash River Generating Station that resulted from the site assessment of the Primary Ash Pond (Pond A and Pond B), Secondary Ash Pond, and South Ash Pond conducted by the United States Environmental Protection Agency (EPA) and its engineering contractors on May 11, 2010. Duke Energy supports the EPA's objective to ensure ash basin dam safety and remains committed to the safe operation and maintenance of coal ash basins.

Duke Energy remains committed to meeting all state and federal requirements and managing its coal combustion byproducts impoundments in a safe and responsible manner. Based on ongoing monitoring, maintenance and inspections, Duke Energy is confident that the ash ponds have the structural integrity necessary to protect the public and the environment.

After reviewing the draft "Dam Safety Assessment of CCW Impoundments" report for the Wabash River Generating Station, Duke Energy offers the following comments:

## Section 2.2.4 South Ash Pond

1. In the last sentence the statement, "...is lined with an exposed HDPE liner." Should be replaced with "...is lined with a composite liner consisting of two feet of clay, meeting 1 x 10<sup>-6</sup> cm/sec permeability, overlain by an HDPE liner."

## Section 3.1.2 Stability Analyses- Primary Ash Ponds A & B and Secondary Ash Pond

2. In the second paragraph of this section the report states, "...there is no presentation of the soil strength parameters used in the analysis nor could we find any explanation of the basis of the soil layering in the model. A phreatic surface was assumed through the dikes, but no basis behind this assumption was presented in the report."

Additional information used as the basis for the slope stability analysis is provided as an attachment to this letter. This information was referenced in the Sargent & Lundy Pond Examination Report but not previously supplied to the EPA or the contractor that completed the inspection. This additional information addresses the comment above.

# Section 6.2 Long Term Improvement- Primary and Secondary Ash Ponds

3. In the first paragraph of this section the report states, "...we recommend that an addendum to the report be prepared that presents the basis of the analysis...additional investigation of the east dike may be required to provide valid data for the slope stability analysis"

Additional information provided as an attachment to this letter provides details of the basis for the slope stability analysis and addresses this recommendation.

If you have any questions regarding these comments or need additional information, please contact me at 980-373-3719.

Sincerely,

D. Edwin M. Sullivan, PE

D. Edwin M. Sullivan

Corporate EHS Services

#### Attachment:

Sargent & Lundy Slope Stability Calculation No. WRC-F-002S

## ISSUE SUMMARY Form SOP-0402-07, Revision 7B

	DESIGN CONTROL SUM	MARY	
CLIENT:	Duke Energy Indiana, Inc.	UNIT NO.:	Page No.: 1
PROJECT NAME:	Wabash River Pond Examination Program		
PROJECT NO.:	10444-806	□ NUCL	EAR SAFETY- RELATED
CALC. NO.:	WRC-F-002S		NUCLEAR SAFETY-RELATED
TITLE:	Ash Pond Slope Stability Analyses		TOOLLY TO ONE ETT-TREETTED
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Attachment B (8 pag	ges).		INDUTO/ AGOURD TIONS
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## 1.0 Purpose

The purpose of this calculation is to determine the factors of safety of the existing exterior slopes of the Fly Ash Pond A dike, Pond B dike, and the Secondary Settling Pond Dike for the static and seismic conditions at the Wabash River Generating Station near Terre Haute, Indiana.

## 2.0 Design Input

- The subsoil profile, the geotechnical laboratory test results, and the recommended in-situ and embankment fill soil parameters were obtained from Ref. 1. The available borings nearest the pond location are B-11 and B-14 in Ref.1 (See also Fig. 1).
- Dike cross-sections and the cross-section locations were obtained from Refs. 2, 3, 4, 5.
- Top elevation of all pond dikes was considered at approximately El. 484' per Refs. 3 and 5.
- The approximate ground elevation is 464 feet at Pond A, Secondary Settling Pond, and Pond B areas (Refs. 2, 4).
- The top elevation of the ash fill is approximately 15 feet higher than the top of the Pond A dike as noted during the pond examination performed by S&L on 10/28/2009. The ash slopes down toward the top of the dike around the edges. This slope was considered as 3 Horizontal: 1 Vertical.
- The ash deposited in Pond A is estimated to have substantially drained and reached a condition where an angle of internal friction as well as a water table elevation can be associated with it. There are no test results available for the in-situ shear strength parameters of the ash deposited in Pond A. Ref. 6 contains triaxial compression test results on compacted samples of the ash from the existing ponds. The shear strength parameters obtained from these tests were discounted to some extent for use in the stability analyses to account for the uncompacted state of the ash inside the ponds. The Secondary Settling Pond contains water only.

#### 3.0 Assumptions

None.

## 4.0 Methodology

The slope stability analyses were performed using SLOPE/W program Version 5.11 (Ref. 10). This program has been verified and validated in accordance with S&L SOP 0204 procedures. The S&L program number is 03.7.747-5.11. The runs were performed on Computer # ZD 2638. For static and seismic slope stability analyses, a large number of slip planes were generated and the factor of safety against sliding was determined for each plane. The slip planes were represented by circular arcs. The potential slip circles were analyzed using the Simplified Bishop Method which is routinely used by engineers for slope stability evaluations (See pages A-1 and A-2 for an overview of the method). Figure 4 shows the rectangular grid that forms the center points of the potential slip circles.

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At each grid point, a number of circles tangent to each of the closely-spaced horizontal lines in the bottom portion of the figure are generated. The minimum factor of safety for each grid point is determined and registered by the software for each grid point. Once all grid points are covered in this manner, the minimum of all the FS values, the center of the most critical slip circle with the lowest FS, and the slip surface are displayed by the software.

The slope stability analyses in clayey embankments often include the effect of a crack that may open up during the service life of the earth structure as a combined result of the repeated wetting/drying repeated freeze/thaw, and gradual lateral deformation (particularly on clayey foundation soils) of the compacted dike soil over a period of several years. The shear strength available along this crack is assumed to be nonexistent, and the potential slip planes are started at the bottom of the crack. However, the dikes considered in this calculation have not shown such a condition over a period of approximately 30 years, and therefore, the slope stability analyses performed for this calculation do not consider this effect.

The slope stability analyses were also performed for the seismic conditions using a horizontal acceleration coefficient. For seismic stability, two separate analyses ("effective stress" and "total strength") are normally performed, and the smaller of the two values obtained is considered as the minimum slope factor of safety against seismic failure (Ref. 7). Generally, for small seismic events that do not significantly alter the porewater pressures in the fill and the in-situ soils, an effective stress analysis would be appropriate. If the porewater distribution is significantly altered as a result of ground shaking during a strong earthquake, the total stress analysis would be appropriate.

#### 5.0 Calculations

#### **Subsoil Conditions**

The soil conditions shown in borings B-11 and B-14 (Ref.1) were considered as generally representative of the pond embankment area. B-11 is 45 feet deep, and B-14 is 10 feet deep.

The soils encountered consist of, from top to bottom:

- 1. Medium stiff to very soft silty clay (approximately 14 feet thick),
- 2. Loose to medium-dense to dense sand to the bottom of the boring (45 feet).

Bedrock was not encountered at 45-ft depth in B-11 although other borings (such as B-1 and B-2) further west encountered shale bedrock at depths as shallow as 18 feet. This indicates an overall downslope gradient from west to east at the top of the rock toward the Wabash River.

Approximately upper six (6) feet of the in-situ clay was described as medium stiff to very stiff (Standard Penetration Blow Counts 5 to 11 blows/ft), whereas the remaining 8 feet was described as soft to very soft (Standard Penetration Blow Counts 2 to 5 blows/ft). However, the slope stability analyses consider the same set of unit weight, friction angle, and cohesion values for both layers.

## Sargent & Lundy ...

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The **effective-stress** embankment and in-situ soil parameters used in the static and seismic analyses are shown below:

TABLE 1

Material	Unit Weight (lb/ft <sup>3</sup> )	Friction Angle, φ'cu	Cohesion, c' <sub>cu</sub> (lb/ft²)
Riprap	110	40	0
Pond Ash	90	25	0
Embankment Fill	120 (*)	22 (*)	250 (*)
In-situ Silty Clay	122 (*)	30 (*)	0 (*)
In-situ Sand	118 (*)	30 (*)	0 (*)

<sup>(\*)</sup> Data from Ref. 1.

The total-stress parameters used in the seismic analyses are as follows:

TABLE 2

Material	Unit Weight (lb/ft <sup>3</sup> )	Friction Angle, φ <sub>cu</sub>	Cohesion, c <sub>cu</sub> (lb/ft <sup>2</sup> )
Riprap	110	40	0
Pond Ash	90	10	250
Embankment Fill	120 (*)	0 (*)	1500 (*)
In-situ Silty Clay	122 (*)	16 (*)	200 (*)
In-situ Sand	118 (*)	30 (*)	0 (*)

<sup>(\*)</sup> Data from Ref. 1.

Many of the parameters in Tables 1 and 2 are provided in Ref. 1 for the design of the south ash pond. The unit weight and shear strength parameters of the riprap were estimated using typical values for rock fills. Also, as indicated above, the shear strength parameters of the compacted ash (Ref. 6) were reduced to adjust for the uncompacted condition of the ash in Pond A. Laboratory test data on the total stress shear strength parameters of the compacted dike fill were not available. The total strength shear strength of the compacted dike fill was represented with a cohesion of 1500 lb/ft² and a friction angle of zero degrees. This is considered as a conservative assumption as the shear strength of compacted fills

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generally increases over time as a result of gradual drying and consolidation of the fill soil which is usually compacted on the wet side of the optimum compaction moisture content.

#### Slope Stability Analyses

Pond B dike construction is essentially identical to that of the Secondary Settling Pond Dike. Also the South pond constructed in 2005 is being filled against the exterior slope of Pond B to eventually achieve an equilibrium condition on both sides of the dike. Therefore, Pond B dike stability was not evaluated in this calculation. The locations of the sections analyzed are shown on Fig. 3.

The seismic slope stability analyses were performed for a horizontal ground acceleration value of 0.05g. This value was obtained from the USGS map of 10-percent exceedance level Peak Ground Acceleration (PGA) values within a 50-year period (Ref. 9). The original seismic slope stability analyses were also performed with 0.05g horizontal acceleration (Ref. 1).

For the static stability analyses in terms of effective stresses, a groundwater surface profile was used. The groundwater surface was approximated in the form of three straight lines shown in Figures 4 and 5. Since no toe seepage along the pond slopes was observed during a recent pond examination (Ref. 8), the groundwater surface was considered to drop within the body of the dikes to the level of the groundwater table observed in the soil borings (Approximately El. 456). The water level within the ash in Pond A is not known, and was considered at about two (2) feet below the top of the berm.

#### Pond A Dike

The perimeter dike has an exterior slope of 2H:1V and an interior slope of 1-1/2H:1V (Section D-D on Fig. 2). The main body of the dike consists of compacted clayey soil. The dike is approximately 20 feet high.

#### Secondary Settling Pond Dike

The perimeter dike has an exterior slope of approximately 3H:1V and an interior slope of 3H:1V (Section 1-1 on Fig. 2). The main body of the dike also consists of compacted clayey soil. The dike is approximately 20 feet high. A layer of riprap was placed over the exterior slope of the dike (Fig. 2). The riprap placed over the interior slope above and below the water line was considered part of the embankment fill as its effect on the overall dike stability is very minor.

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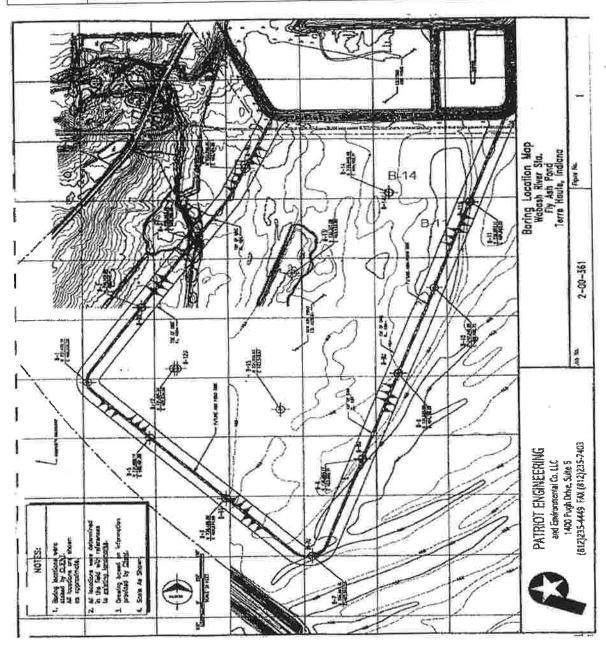
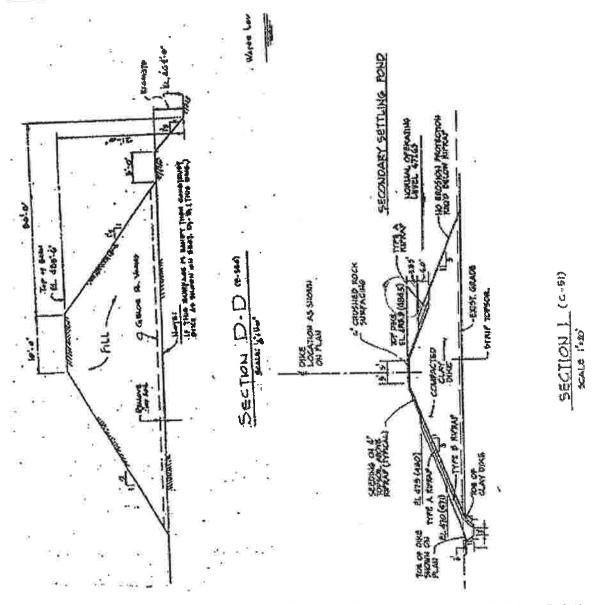


FIGURE 1 (From Ref. 1)

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POND A DIKE (From Ref. 5)

SECONDARY SETTLING POND DIKE (From Ref. 3)

FIGURE 2

# Sargent & Lundy \*\*\*

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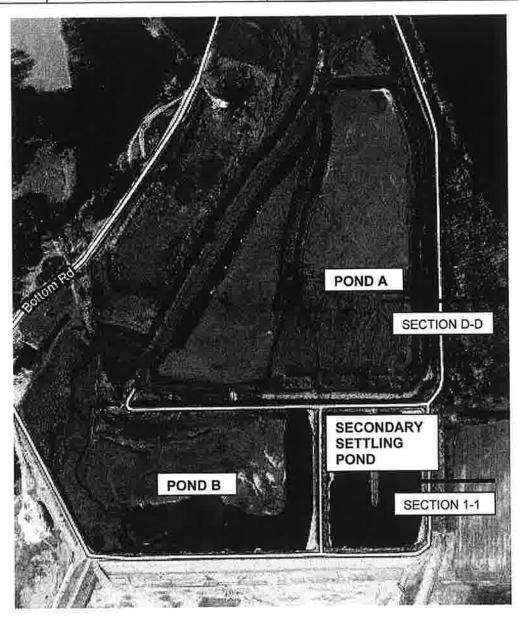
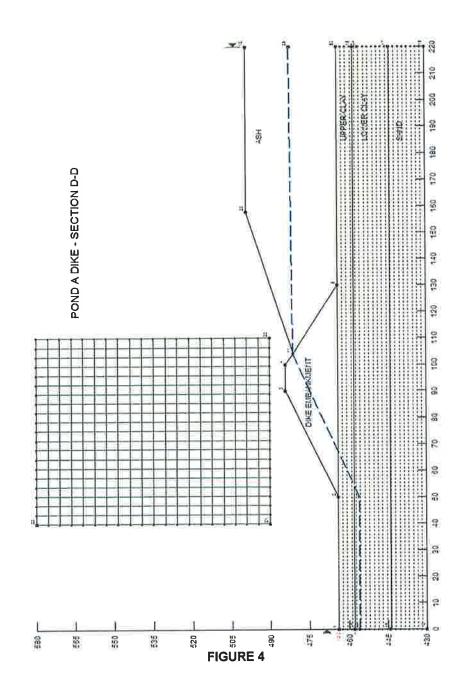


FIGURE 3

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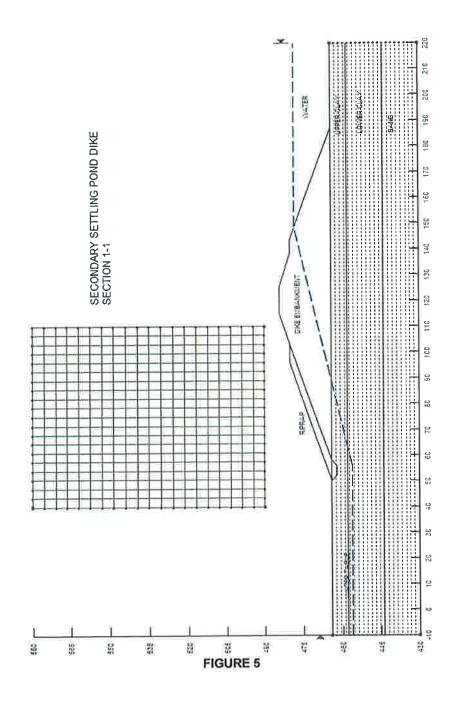
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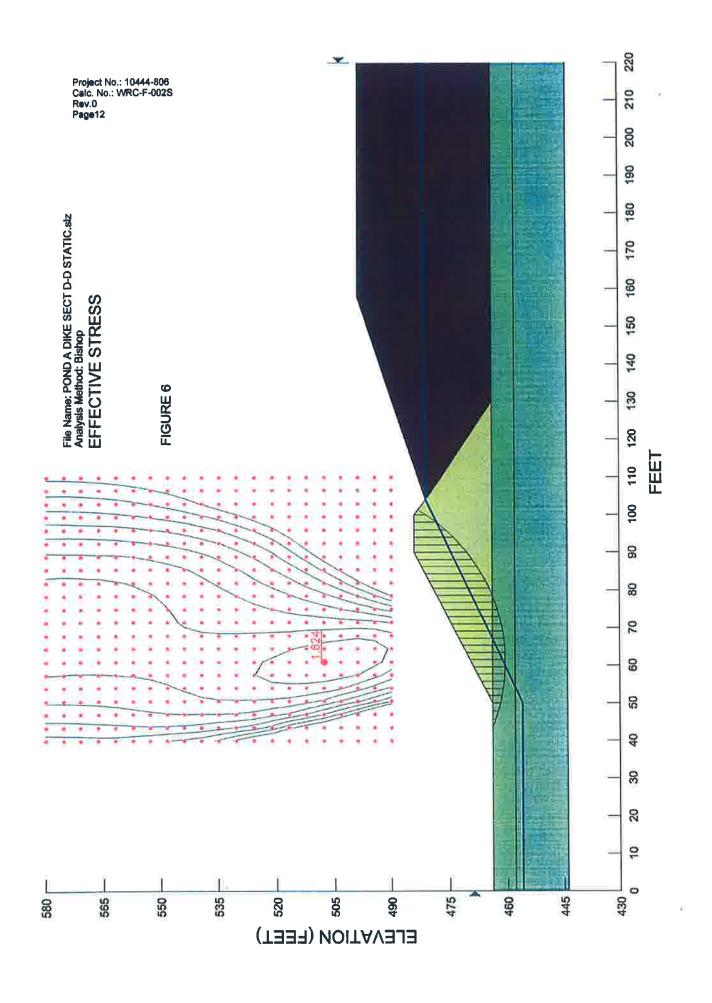


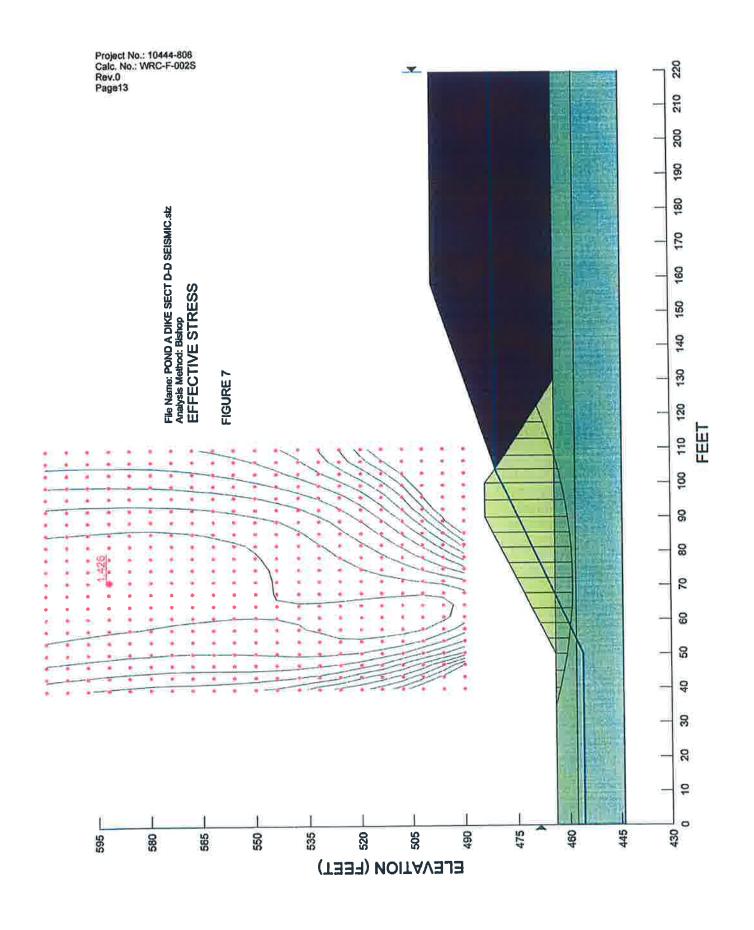
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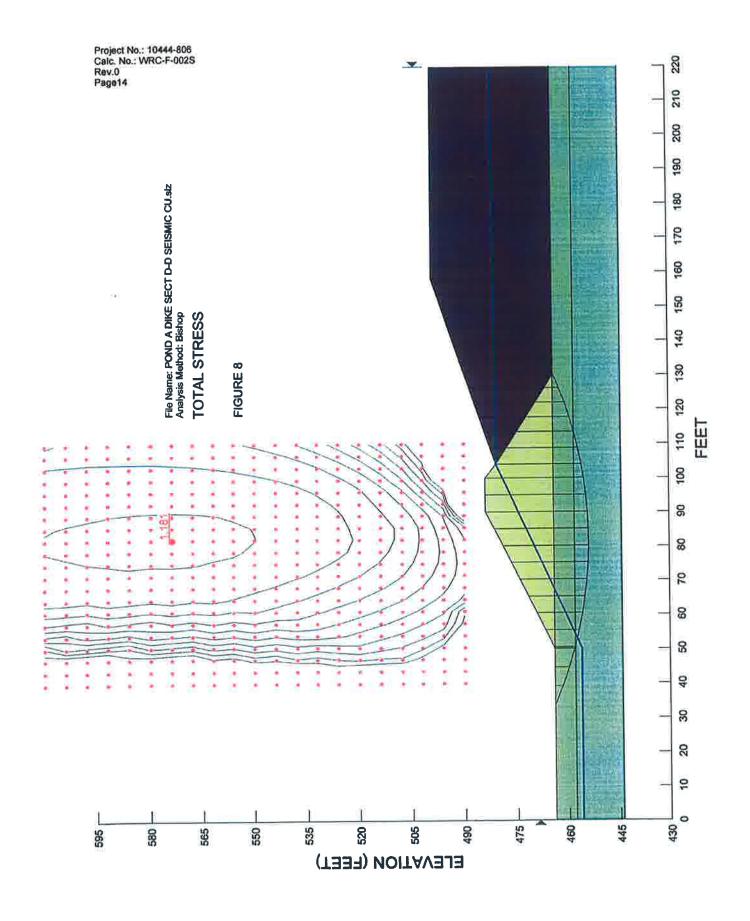
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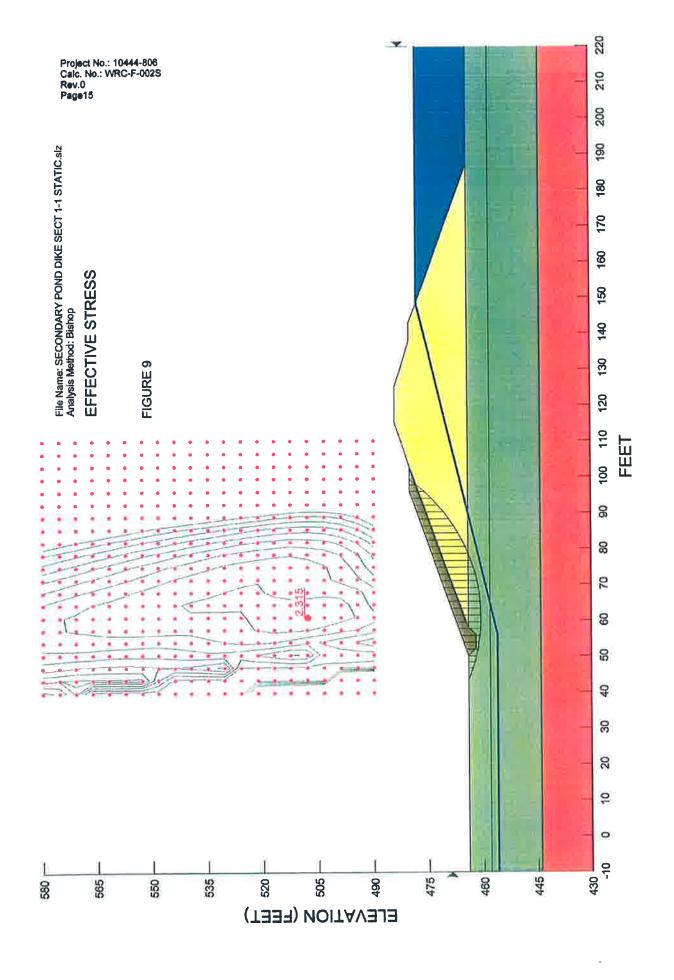
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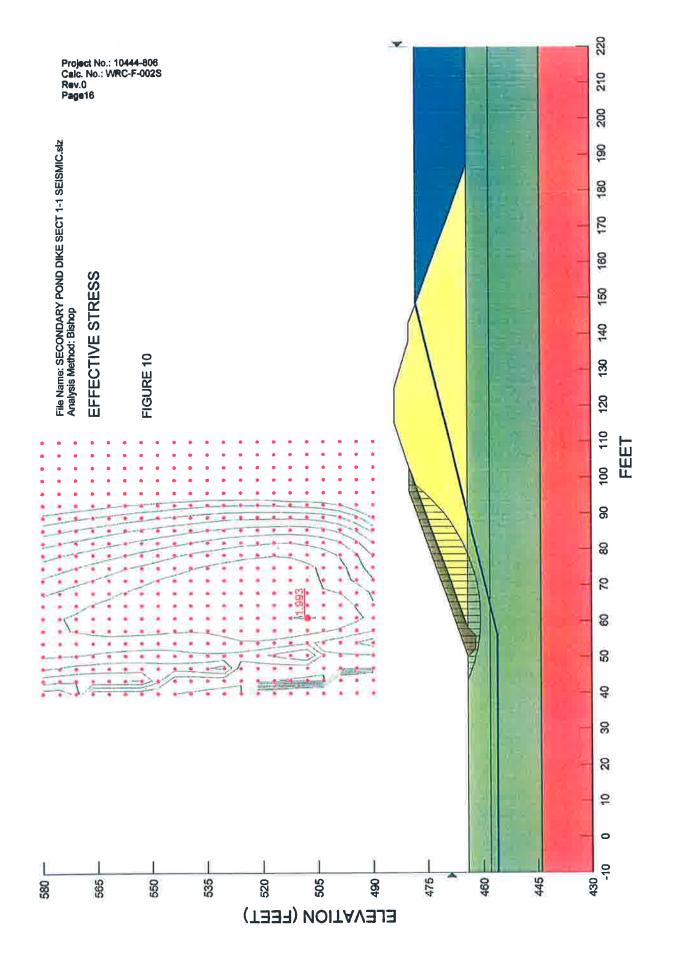


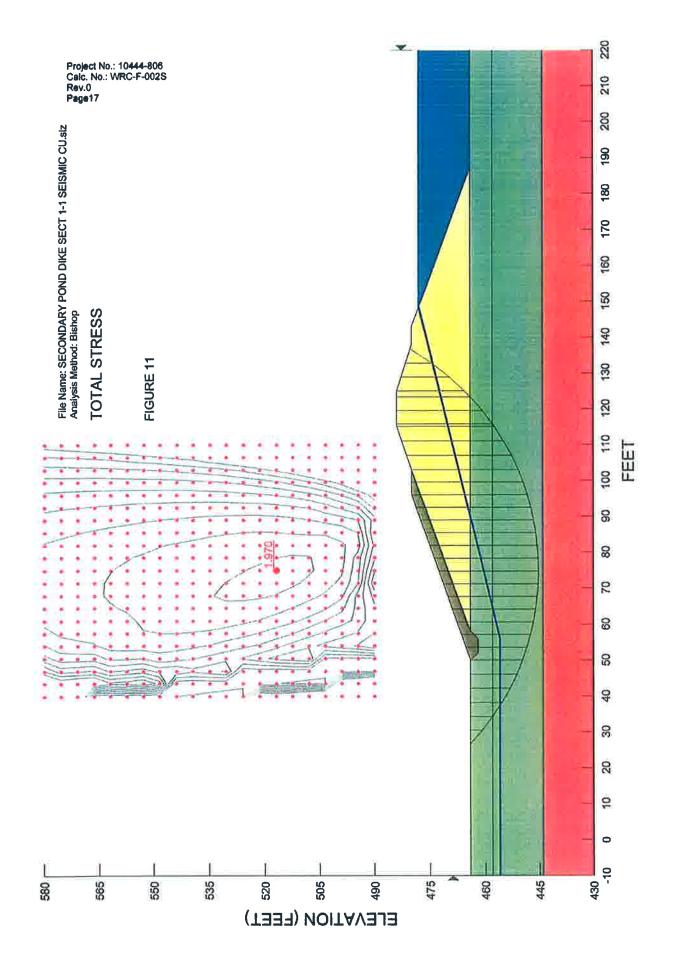












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#### Results

Figures 6 through 11 contain the results of the runs with the minimum factors of safety indicated. The computer analysis printout of the static analysis for Section D-D is also provided as an example (Attachment B).

The results of the static and seismic stability analyses for both ponds are summarized in Table 3. The cross-sections analyzed are shown in Figs. 4 and 5.

TABLE 3	
Static FS <sub>min</sub> (Min FS = 1.5)	

Section Analyzed	Static FS <sub>min</sub> (Min FS = 1.5)	Seismic FS <sub>min</sub> (Min FS = 1.1)
Pond A Dike (Section D-D) (Figs. 6, 7, 8)	1.624	1.426 (Effective Stress) 1.181 (Total Stress)
Secondary Settling Pond (Section 1-1) (Figs. 9, 10, 11)	2.315	1.993 (Effective Stress) 1.970 (Total Stress)

## 6.0 Summary

The stability analyses of the Pond A and the Secondary Settling Pond dikes at the Wabash River Generating Station indicated acceptable factors of safety for the existing exterior slopes of the dikes against a mass slope instability under the weight of the dikes as well as the external forces acting on the dikes (hydrostatic, ash fill retained). The minimum acceptable static factor of safety is 1.5 per Ref. 7 for the "downstream" slope of embankment dams.

Acceptable slope factors of safety were also obtained from the seismic analyses performed with a lateral seismic load coefficient of 0.05g (10-percent exceedance level in 50-year period). The minimum acceptable seismic factor of safety is 1.1 per Ref. 7 for the "downstream" slope of embankment dams, which was exceeded in the calculations.

Stability analyses were not performed for Pond B dike since ash is being gradually deposited against the exterior face of this dike as the new ash disposal area south of the Pond B is filled.

#### 7.0 References

- Patriot Engineering (2000) "Revised Report of Geotechnical Investigation Proposed New Fly 1. Ash Pond West Terre Haute, Indiana".
- Sargent & Lundy Drawing C-51, "Ash and Secondary Ash Ponds Sheet 1, Wabash River 2. Station, Public Service Indiana, Terre Haute, Indiana" Rev. D, dated 1/22/87.

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- 3. Sargent & Lundy Drawing C-53, "Ash and Secondary Ash Ponds Section & Details Sheet 1, Wabash River Station, Public Service Indiana, Terre Haute, Indiana" Rev. C, dated 1/22/87.
- 4. Sargent & Lundy Drawing B-554, "Ash Disposal Area Plan South Portion Units 1 to 6, Wabash River Station, Public Service Indiana, Terre Haute, Indiana" Rev. H, dated 1/22/87.
- 5. Sargent & Lundy Drawing B-555, "Ash Disposal Area Sections Units 1 to 6, Wabash River Station, Public Service Indiana, Terre Haute, Indiana" Rev. G, dated 1/22/87.
- 6. Burns & McDonnell (2002) "Addendum No. 2 to Slope Stability Analysis South Ash Pond Extension, Wabash Generating Station, West Terre Haute, Indiana".
- 7. USDA (1990) "Earth Dams and Reservoirs", Technical Release No. 60, U.S. Department of Agriculture, Soil Conservation Service, Engineering Division.
- 8. SL-010066, "Wabash River Pond Examination Program Pond Examination Report", Rev. 0, November 2009.
- 9. USGS (2008) "Documentation for the 2008 Update of the United States National Seismic Hazard Maps", Open File Report 2008-1128.
- 10. GEO-SLOPE International Ltd. (2002) "SLOPE/W for Slope Stability Analysis", Version 5.11.

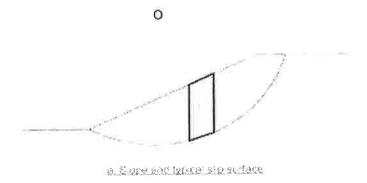
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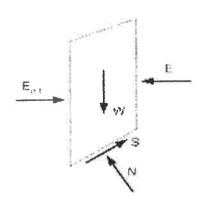
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# The Simplified Bishop Method

The Simplified Bishop Method used in slope stability analyses in this calculation was developed by Bishop (1955). The potential slip surfaces that can cause slope stability concern are assumed to be circular (See Figure 1.a below) or a combination of straight lines (blocks). The soil mass bounded by the slope face and the slip circle is normally divided into a series of vertical slices. One such slice is shown on Figure 1.a. The forces acting on each slice are shown on Figure 1.b. These are:

- 1. Weight of the slice (W),
- 2. Shear Resistance Force along the base of the slice (S),
- 3. Normal Force along the base of the slice (N), and
- 4. Lateral inter-slice forces (E<sub>i</sub> and E<sub>i+1</sub>).





b Typical slice

Figure 1

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The Shear Force along the base of the slice (S) may be due to friction (cohesionless soils) or both cohesion and friction (cohesive soils). In cohesionless soil, the relationship between S and N is expressed as S = N tan $\phi$  where  $\phi$  is the internal friction angle of the soil. In cohesive soil, the corresponding equation is S = cL + Ntan $\phi$  where c is the cohesive component of the shear strength and L is the length of the slice along the base (Mohr-Coulomb Equation). The two lateral force components (E<sub>i</sub> and E<sub>i+1</sub>) are assumed to be equal in magnitude and do not figure in the overall stability of the slices.

During the stability analysis, the total moments (about point O in Figure 1) resisting failure ( $M_r$ ) and the total moments that tend to mobilize the soil mass due to the weight of the soil or the external forces that act on the soil ( $M_m$ ) are calculated. Both moments are calculated relative to the center of the circular slip surface and are summations of the contributions from each slice.  $M_r$  is the summation of the shear resistance force (S) for each slice along the base of the slice multiplied by the moment arm (radius of the circle).

At the start of the analysis, the maximum values of soil strength parameters (c,  $\phi$ ) can be assigned to calculate S for each slice and a factor of safety (FS) can be calculated using  $M_r/M_m$  ratio. However, the vertical equilibrium of each slice may not necessarily be satisfied. Therefore, the analysis actually starts with an assumed FS value on c and  $\phi$  (actually tan  $\phi$ ) and the value of FS is varied until vertical equilibrium is satisfied for each slice within a prescribed margin of tolerance. At this point, the  $M_r/M_m$  ratio calculated is the FS for the particular slip circle considered. Therefore, the Simplified Bishop Analysis is a successive approximation type procedure that requires a number of iterations on FS for each slip circle.

This same procedure is repeated for a large number of potential slip circles to determine the location of the circle with the lowest FS. The available computer programs perform this analysis methodically by using an imaginary grid above the slope. At each grid point, several slip circles with different radii are generated using the grid point as the center of the circles. The lowest FS for all circles at each grid point is registered by the software. Once all grid points are processed, the software marks the grid point with the lowest FS and draws the slip circle corresponding to the lowest FS. If desired, other grid points can be clicked on to obtain FS values for other slip circles that might be of interest.

Due to a number of simplifications (i.e., lateral slice forces, as well as horizontal and moment equilibrium for each slice are not considered) inherent in it, this method has been named the "Simplified Bishop Method". Incorporating all forces affecting the slices would have made the analysis statically indeterminate (i.e., can not be solved by using lateral force, vertical force, and moment equilibrium conditions in two-dimensional space) and would have required substantially more elaborate analyses.

#### Reference:

1. Bishop, A.W. (1955) "The Use of the Slip Circle in the Stability Analysis of Slopes", Geotechnique, Vol. 5, No. 1, pp. 7-17.

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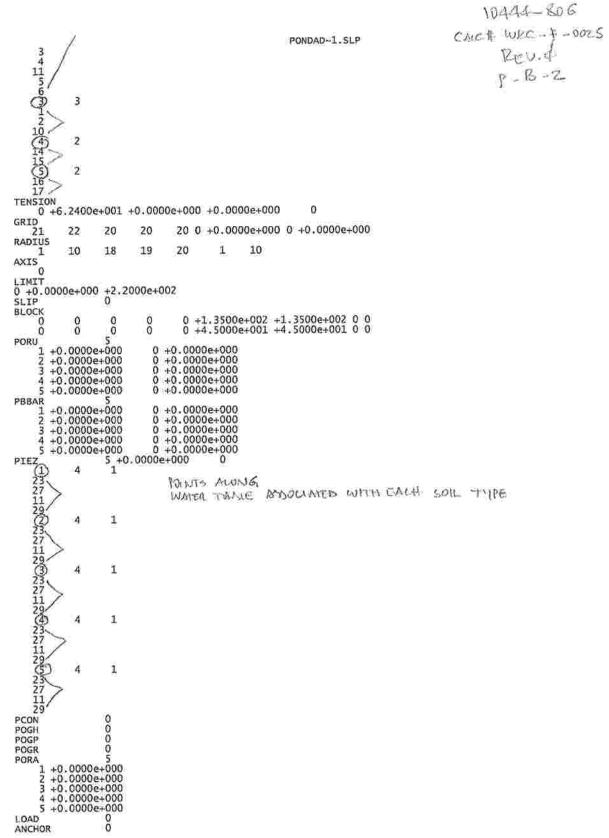
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	Res_Force	3.0325e+004 3.1157e+004
POND A DIKE 7.7532e+003 7.8988e+003 7.8988e+003 7.7565e+003 7.4692e+003 7.1126e+003 6.6273e+003 6.6273e+003 8.495e+003 1.4479e+003 5.8099e+002 -3.1853e+001 -2.5095e+002	Act_Moment	1.0080e+006 1.0080e+006 1.0080e+006
0.0000e+000 0.0000e+000 0.0000e+000 2.5000e+002 2.5000e+002 2.5000e+002 2.5000e+002 2.5000e+002 2.5000e+002 2.5000e+002 2.5000e+002 2.5000e+002 2.5000e+002 2.5000e+002 2.5000e+002 2.5000e+002 2.5000e+002 2.5000e+002	Res_Moment	1.5320e+006 1.6371e+006 1.6594e+006
3.0000e+001 3.0000e+001 3.0000e+001 2.2000e+001 2.2000e+001 2.2000e+001 2.2000e+001 2.2000e+001 2.2000e+001 2.2000e+001 2.2000e+001 2.2000e+001 2.2000e+001 2.2000e+001 2.2000e+001 2.2000e+001 2.2000e+001 2.2000e+001 2.2000e+001	Weight	6.4640e+004 6.4640e+004 6.4640e+004 6.4640e+004
8.5040e+002 8.3883e+002 8.2599e+002 8.6877e+002 8.6877e+002 8.6770e+002 8.6777e+002 8.9277e+002 8.9250e+002 8.9250e+002 8.9250e+002 8.5197e+002 8.3197e+002	ary Volume	5.3733e+002 5.3733e+002 5.3733e+002 5.3733e+002
15 2.9488e+003 16 2.9695e+003 17 2.9783e+003 18 2.9781e+003 19 2.9458e+003 20 2.9311e+003 21 2.9110e+003 22 2.8855e+003 24 2.8120e+003 25 2.7874e+003 27 2.0277e+003 27 2.0277e+003 27 2.0277e+003 28 1.4878e+003 29 7.9022e+003 30 -8.1383e+001	Slip_Surface_Summary Analysis Vo	Ordinary Method   Janbu Wethod   Janbu Wethod   M-P Method   M-P Metho

age

# REVIEW COMMENT Form SOP-0402-03, Revision 7B

Project:	Duke Energy Indiana, Inc.	Unit:	
Project No.	: 10444-806 Calc. No. WRC-F-002S		Calc. Rev. 0
Calc. Title:	Ash Pond Slope Stability Analyses		
#	Comment	Resolution	on
	NONE		
Reviewed b	DY: W. ROGER WU/PEllen	Date: 11/	23/09

SOP040203.DOC Rev. Date: 11-12-2007