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United States Department of the Interior



NATIONAL PARK SERVICE
Biscayne National Park
9700 S. W. 328th Street
Homestead, Florida 33033-5634

IN REPLY REFER TO:

N16

December 22, 2000

Mr. James Wilson, Chief, Rules and Directives Branch
Division of Administrative Services
Mailstop T-6 D59
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

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Rules and Directives
Branch
USNRC

Dear Mr. Wilson:

The National Park Service (hereafter the "Service") appreciates the opportunity to provide scoping comments for the Supplement to the Generic Environmental Impact Statement (GEIS) on potential environmental impacts of license renewal and alternatives to license renewal for the Turkey Point Nuclear Plant, Units 3 and 4, in Homestead, Florida. The Service understands the Nuclear Regulatory Commission (NRC) is committed to the protection of human health and safety, environmental quality, national defense and security. The Service also understands the goal of the applicant, Florida Power and Light (FPL), is the renewal of their operating license to allow power generation capability twenty years beyond the term of the current license. We further understand that both the NRC and FPL want to ensure that this facility operates in a manner that protects the environment and supports the local and regional economy.

We recognize that some of the concerns raised below are not solely related to the operation of the nuclear units, but we are raising them because we feel that they should be considered during the relicensing review that is now underway. From our standpoint, we view the plant in its entirety and are compelled to comment holistically, as opposed to distinguishing between nuclear and fossil fuel aspects of the plant. We do so with the understanding that the two are really inseparable as far as the plant's very function and potential environmental impacts are concerned.

While the Service supports and appreciates the critical role Turkey Point Plant plays in the local community and economy as a large employer, philanthropist, and service provider, our intent here is to assist NRC during scoping to identify potential

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environmental issues resulting from alternatives to be analyzed related to the current and future operation of the Turkey Point Plant. The Service recommends the full review of impacts and inclusion of all possible mitigation to help Biscayne National Park meet its mission of resource preservation and protection for present and future generations. The Service welcomes the opportunity to work with the NRC and FPL throughout the environmental review and analysis.

Introduction

Turkey Point Power Plant and property abuts Biscayne National Park (hereafter the "Park"). As FPL's closest neighbor, the Park is greatly concerned about the future of the facility and overall operations associated with running the plant. Biscayne National Park was set aside by Congress for the fundamental purpose stated in the National Park Service's Organic Act, "to conserve the scenery and the natural and the historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." The key management-related provision of the Organic Act is the nondegradation or no-impairment mandate for all park managers. The high standard of no-impairment helps ensure in perpetuity the health and integrity of the resources and values protected by the National Park System. The Service welcomes the opportunity to work with the NRC and FPL to investigate ways to help the Service achieve its mission as it relates to Biscayne National Park.

Scoping Issues and Concerns

The Service understands that the GEIS and its Supplement will analyze license renewal and non-renewal alternatives. The Service feels it is important to provide scoping comments for both the presumed "proposed action" of license renewal and alternatives that may be considered in place of nuclear power generation.

The Service understands under renewal, the nuclear units will continue operations much as they do today, including continued reliance on the fossil fuel units to meet gaps in nuclear production and demand. The Service realizes the extensive cooling canal system will continue to be a critical component of Plant operations. The high standards of safety and security at the Plant are assumed to continue and improve. The Service also understands that during the life of the license extension, the Plant may be required to increase the current levels of energy production to meet ever-growing demands. This increase in demand during the extension years may be met by an increase in energy production from the fossil fuel units of the Turkey Point Plant.

Without knowing the details of the potential non-renewal alternatives, the Service believes the GEIS and the Supplement will examine alternatives, which may include converting the Turkey Point Plant entirely to fossil fuel and or the possible construction of new fossil fuel facilities.

Overarching Scoping Issues - License Renewal and All Alternatives.

Biscayne Bay Natural Habitat

The Park's name is derived from Biscayne Bay and many consider the Bay the heart of the National Park. The Bay is a shallow estuarine identified as an Outstanding Florida Water Body. The Bay is also the focus of the Biscayne Bay Partnership Initiative, a multi-organizational group, that the Park and FPL are members of, dedicated to preserving this very fragile marine ecosystem in perpetuity. In a similar vein of cooperation, the Park is anxious to work with FPL to investigate alternative methods of fossil fuel delivery to the Power Plant. Currently, the delivery of fossil fuel occurs by barge from the port of Miami through Biscayne Bay with over 300 trips each year hauling 12,000 barrels of bunker "C" fuel oil to the Plant.

The barge has run aground numerous times, and each trip adversely impacts the water quality by churning up the Bay bottom into the water column creating a turbidity plume that lasts long after the barge has passed. The thrust from the barge's tugboat may disrupt seagrass recovery by potentially ripping it from the bottom, as well as any other attached vegetation. Turbidity is known to limit the photosynthesis of both the phytoplanktonic and seagrass communities that are essential for a healthy marine ecosystem. We realize that the fuel barge is under contract and not directly operated by FPL, but the barge is in the Park because of FPL. The continuation of this delivery method is strongly opposed by Biscayne National Park. We have asked FPL to consider the possibility of extending an existing and under-utilized fuel pipeline from the former Homestead Air Force Base to the Power Plant as an alternative. We recommend the same potential mitigation be considered under the proposed action and all alternatives within the Supplement. We especially recommend that other fuel delivery methods be explored because of the need to maintain this "anchor" in the Florida power grid long into the future.

Natural Soundscapes

An important part of the Service mission is to preserve and/or restore the natural soundscapes associated with units of the national park system. They are inherent components of "the scenery and the natural and historic objects and the wild life" protected by the National Park Service Organic Act. The natural ambient sound level of a park is the natural soundscape of that park. It is comprised of the natural sound conditions in a park that exist in the absence of any human-produced noises. This is the basis for determining the "affected environment" in National Environmental Policy Act documents and other environmental assessments related to human actions producing inappropriate or intrusive impacts on the park soundscape. Noise monitoring conducted by a noise consultant for the National Park Service identified the natural ambient sound levels in the southwestern portion of the park to be at or below 30 decibels.

The operation of Turkey Point Plant may result in intrusive industrial noise that may impede Biscayne National Park's efforts to preserve and/or restore the park's natural ambient sound levels in the park environments adjacent to the Power Plant. Service

directives mandate that park managers constructively work with those responsible for neighboring noise sources that impact parks to explore what can be done to better protect parks. With this in mind, the Service recognizes the vital missions of the Nuclear Regulatory Commission and Florida Power and Light and the potentially unavoidable by-product of noise as you achieve your mission. The Park is interested in gaining more information related to any potential existing and future impacts to the natural soundscape. We recommend the Supplement include the natural soundscape of the park as part of the "affected environment" when identifying impacts and any potential mitigation for such impacts. We acknowledge the complexities of mitigating noise intrusions from industrial facilities, therefore, we also recommend the Supplement consider long-term soundscape monitoring to help determine whether or if mitigation may be required in the future under the proposed action and all alternatives.

Air Resources

The Service is concerned about the continued introduction of anthropogenic air pollutants and particulate matter into an area of special concern. Although Biscayne National Park is designated a Class II Air Resource, the National Park Service Organic Act requires the Service protect (air) resources regardless of the air quality related values (AQRV) status. We recommend the Supplement identify the cumulative effect associated with projected population growth and continued and increasing emissions under the proposed action and all alternatives. We also recommend that maximum mitigation measures be implemented to prevent additional air pollutants. We also recommend that mitigation measures, including air scrubbers and other similar technologies be fully evaluated and implemented to the maximum extent possible to prevent particulate matter and other pollutants from being emitted into the air.

Native Plants, Animals, and Wildlife

Biscayne National Park helps provide refuge for many of the threatened and endangered species and other species of special concern of South Florida. The struggle to preserve and protect these rare and endangered species is complicated by many factors such as, continued proliferation of exotic plant species, alteration of natural habitat, loss of natural habitat, disruption of natural hydrology, disruption of predator/prey balance, loss of food source, over-harvest, and disturbance of breeding areas. The lands associated with the Turkey Point Plant have the ability to benefit or harm many of the critical species of South Florida.

We recommend the Supplement consider continued and expanded exotic plant eradication from FPL property for its benefits of removing harmful seed sources. We recommend the Supplement consider the impacts and benefits that have occurred due to the alteration of the natural habitat from the Turkey Point cooling canals. The Park recognizes the success of the cooling canals as artificial breeding grounds for the endangered North American saltwater crocodile. The park hopes to work more closely with FPL in the future with data exchange regarding the North American saltwater crocodile, to include monitoring of tagged animals that are observed in the park and research projects that could jointly benefit park resource managers and FPL.

The Park's Scenery (Scenic Features and Natural Landscapes)

As indicated in the Organic Act and the park's enabling legislation, scenic vistas and natural settings are directly identified as resources to be preserved and protected by park managers. Biscayne National Park's tropical setting is special due to its role in protecting some of the last remaining examples of "old Florida." The Power Plant's location, size, and industrial features alter "old Florida's" natural landscape and scenic vistas. While the Park realizes this alteration is largely unable to be mitigated, we are interested in the Supplement investigating ways to minimize the facility's current intrusions and that this issue is considered in any further development. A potential mitigation option to be considered under the proposed action and all alternatives may include repainting the structures in natural tones that mirror the surrounding landscape, and consequently are less obtrusive to the natural setting.

Natural Visibility (Night Skies)

One of the resources that park management is greatly concerned about is the Park's night sky. This is a fragile resource that is sought after by many visitors and residents and is critical to the health of wildlife. The Service is interested in working with FPL to minimize the excessive lighting of the Plant from dusk to dawn. We understand there are serious safety and security constraints that require sufficient lighting, yet the Park would want to see the installation of innovative shielding and other mitigation measures that would lessen the "glow" that can currently be seen as far east as the park's barrier islands (7 miles offshore). We recommend the Supplement include mitigation options for the night sky under the proposed action and all alternatives.

Mainland and Nearshore Habitat

The natural habitat north, south, and east of Turkey Point Nuclear Power Plant is protected within Biscayne National Park. This area is identified within park management plans as some of the most sensitive and critical resources of the park. The area south and southwest of the plant, just outside of the Park, contains the 100+ miles of cooling canals that have altered the natural environment by maintaining a hypersaline area of influence that in turn impedes natural groundwater flow from the upland side of the canals into the Bay. The downstream side of these canals contains dwarf mangroves and high salinity marshes, which are due to the lack of freshwater flow that once occurred in this area prior to the cooling canals creation. While the Park understands the cooling canals must remain as part of the Plant's operations and while we appreciate their function of avoiding the direct release of heated water into the Bay, the Park recommends the Supplement investigate ways to reverse some of the adverse impacts under the proposed action and all alternatives. Rehydrating the hypersaline marshes with fresh water is one example of potential mitigation to be considered during the analysis.

Scoping Issues - Non-Renewal Alternatives

The following issues include concerns over adoption of alternatives with reliance on fossil fuels for power production:

Loss of Important Environmentally Sensitive Lands, Open Space or Farmland

Biscayne Bay has been identified as requiring restoration from existing alterations and influences within its watershed that have reduced fresh water flow. The Service is

concerned that the alternatives to license renewal will result in the demand to develop new power plant facilities in deep South Dade, leading to land use changes that prevent the ability to preserve and protect the Bay. The direct and cumulative impacts related to a large-scale development of this character should be fully identified within the Supplement.

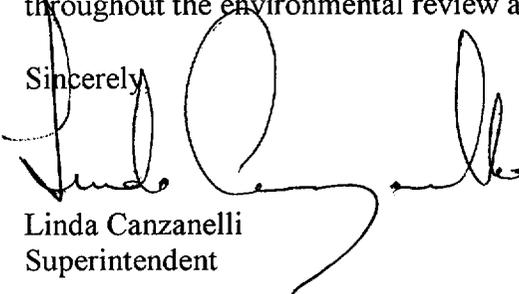
Reliance on Fossil Fuels for Power Production

As indicated in the overarching issues, the Service is very concerned about the detrimental impacts that will occur without the power production from the nuclear units. To meet the energy demands additional fossil fuel will be required. As delivery is set today, this would result in a dramatic increase in the numbers of FPL barge transports through Biscayne National Park's sensitive marine ecosystem. Without nuclear energy production, reliance on burning fossil fuels without using extensive mitigation methods will result in serious threats to the Park's air quality. The Supplement should address these concerns during the alternatives analysis.

Conclusion

Given the aforementioned issues, the National Park Service strongly recommends that the Supplement to the Generic EIS address concerns related to the future health and integrity of Biscayne National Park. Biscayne National Park will remain here long after the life of the nuclear facility is over. The National Park Service is interested in working with NRC and FPL to create new and productive partnerships to begin to mitigate current and future impacts from Turkey Point Plant. We look forward to assisting the NRC and FPL throughout the environmental review and analysis.

Sincerely,



Linda Canzanelli
Superintendent