

**Environmental Impact Statement  
Scoping Process**

**Summary Report**

**Turkey Point Units 3 and 4  
Miami-Dade County, Florida**

**March 2001**

**U.S. Nuclear Regulatory Commission  
Rockville, Maryland**

## Introduction

On September 9, 2000, the Nuclear Regulatory Commission (NRC) received an application dated September 8, 2000, for renewal of the operating licenses of Turkey Point Units 3 and 4. The Turkey Point units are located outside of Florida City, Florida, about 30 miles south of Miami, Florida. As part of the application, Florida Power and Light Company (FPL), the applicant, submitted an environmental report (ER) prepared in accordance with the requirements of 10 CFR Part 51. 10 CFR Part 51 contains the NRC requirements for implementing the National Environmental Policy Act (NEPA) of 1969 and the implementing regulations promulgated by the Council on Environmental Quality (CEQ). Section 51.53 outlines requirements for preparation and submittal of ERs to the NRC.

Section 51.53(c)(3) was based upon the findings documented in NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Power Plants," (GEIS). The GEIS, in which the staff identified and evaluated the environmental impacts associated with license renewal, was issued for public comment. The staff received input from Federal and State agencies, public organizations, and private citizens. As a result of the assessments in the GEIS, a number of impacts were determined to be generic to all nuclear power plants. These were designated as Category 1 impacts. An applicant for license renewal may adopt the conclusions contained in the GEIS for Category 1 impacts, absent new and significant information that may cause the conclusions to fall outside those of the GEIS. Category 2 impacts are those impacts that have been determined to be plant-specific and are required to be addressed in the applicant's ER. The Commission determined that the NRC does not have a role in energy planning decision-making for existing plants, which is left to State regulators and utility officials. Therefore, an applicant for license renewal need not provide an analysis of the need for power, or the economic costs and economic benefits of the proposed action. Additionally, the Commission determined that the ER need not discuss those aspect of storage of spent fuel for the facility within the scope of the generic determination in 51.23(a) and 51.23(b). This determination was based on the Nuclear Waste Policy Act of 1982 and the Commission's Waste Confidence Rule, 10 CFR 51.23.

On October 24, 2000, the NRC published a Notice of Intent in the Federal Register (65 FR 63636), to notify the public of the staff's intent to prepare a plant-specific supplement to the GEIS to support the renewal application for the Turkey Point operating licenses. The plant-specific supplement to the GEIS will be prepared in accordance with NEPA and 10 CFR Part 51. As required by NEPA, the NRC initiated the scoping process with the issuance of the Federal Register Notice. The NRC invited the applicant, Federal, State, and local government agencies, local organizations, and individuals to participate in the scoping process by providing oral comments at the scheduled public meetings and/or submitting written suggestions and comments no later than December 22, 2000. The scoping process included two public scoping meetings, which were held at the Harris Field Complex – Homestead YMCA in Homestead, Florida on December 6, 2000. The NRC announced the meetings in local newspapers (South Dade News Leader, Diarios Las Americas, and The Miami Herald), issued press releases, and distributed flyers locally. Approximately 80 people attended the meetings. Both sessions began with NRC staff members providing a brief overview of the license renewal process and the NEPA process. Following the NRC's prepared statements, the meetings were open for public comments. Many attendees provided either oral comments or written statements that were recorded and transcribed by a certified court reporter at the public meeting. The meeting transcripts are available on the NRC Internet website at:

<http://www.nrc.gov/NRC/REACTOR/LR/TURKEYPOINT/docs.html>. In addition to the comments provided during the public meetings, five comment letters and three e-mail messages were received by the NRC in response to the Notice of Intent. The meeting summary, comment letters, and e-mail are available electronically for public inspection in the NRC Public Document Room or from the Public Electronic Reading Room component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/NRC/ADAMS/index.html>.

The scoping process provides an opportunity for public participation to identify issues to be addressed in the plant-specific supplement to the GEIS and highlight public concerns and issues. The Notice of Intent identified the following objectives of the scoping process:

- Define the proposed action
- Determine the scope of the supplement to the GEIS and identify significant issues to be analyzed in depth
- Identify and eliminate peripheral issues
- Identify any environmental assessments and other environmental impact statements being prepared that are related to the supplement to the GEIS
- Identify other environmental review and consultation requirements
- Indicate the schedule for preparation of the supplement to the GEIS
- Identify any cooperating agencies
- Describe how the supplement to the GEIS will be prepared

At the conclusion of the scoping period, the NRC staff and its contractor, Pacific Northwest National Laboratory, reviewed the transcripts and all written material received, and identified individual comments. All comments and suggestions received orally during the scoping meetings or in writing were considered. Each set of comments from a given commenter was given a unique identifier (Commenter ID number), allowing each set of comments from a commenter to be traced back to the transcript, letter, or email in which the comments were submitted. Several commenters submitted comments through multiple sources (e.g., afternoon and evening scoping meetings).

Table 1 identifies the individuals providing comments and the Commenter ID number associated with each person's set(s) of comments. Accession numbers indicate the location of the comments in the ADAMS.

Comments were consolidated and categorized according to the topic within the proposed supplement to the GEIS or according to the general topic if outside the scope of the GEIS. Comments with similar specific objectives were combined to capture the common essential issues that had been raised in the source comments. Once comments were grouped according to subject area, the staff and contractor determined the appropriate action for the comment.

The staff made a determination on each comment that it was one of the following:

- a comment that was either related to support or opposition of license renewal in general (or specifically, Turkey Point) or that makes a general statement about the licensing renewal process. It may make only a general statement regarding Category 1 and/or Category 2 issues. In addition, it provides no new information
- a comment about a Category 1 issue that
  - provided new information that required evaluation during the review, or
  - provided no new information
- a comment about a Category 2 issue that
  - provided information that required evaluation during the review, or
  - provided no such information
- a comment that raised an environmental issue that was not addressed in the GEIS
- a comment about environmental justice
- a comment about related Federal projects
- a comment about alternatives to the proposed action
- a comment regarding safety issues within the scope of 10 CFR Part 54, but out of the scope of 10 CFR Part 51
- a comment outside the scope of license renewal (not related to 10 CFR Parts 51 or 54), which include
  - a comment about the need for power, or
  - a comment on operational safety issues, or
  - a comment on emergency preparedness
- a comment that was actually a question and introduces no new information

Each comment is summarized in the following pages. For reference, the unique identifier for each comment (Commenter ID number listed in Table 1 plus the comment number) is provided. In those cases where no new information was provided by the commenter, no further evaluation will be performed.

The preparation of the plant-specific supplement to the GEIS (which is the SEIS) will take into account all the relevant issues raised during the scoping process. The SEIS will address Category 1 issues by adopting conclusions in the GEIS, unless new and significant information is found about those issues. The SEIS will also address Category 2 issues and any new information identified as a result of scoping. The SEIS will rely on conclusions supported by information in the GEIS for Category 1 issues, and will include the analysis of Category 2 issues and any new and significant information. The draft plant-specific supplement to the GEIS will

be issued for public comment. The comment period will offer the next opportunity for the applicant, interested Federal, State, and local government agencies, local organizations, and members of the public to provide input to the NRC's environmental review process. The comments received on the draft SEIS will be considered in the preparation of the final SEIS. The final SEIS, along with the staff's Safety Evaluation Report (SER), will provide the basis for the NRC's decision on the Turkey Point license renewal application.

**TABLE 1 - Individuals Providing Comments During Scoping Comment Period**

<b>Commenter ID</b>	<b>Commenter</b>	<b>Affiliation (If Stated)</b>	<b>Comment Source and ADAMS Accession Number</b>
1	Dr. Roy Phillips	Miami-Dade Community College	Scoping Meeting (ML010120120)
2	Curtis Ivey	City of Homestead	Scoping Meeting (ML010120120)
3	Mark Oncavage	Public	Scoping Meeting (ML010120120)
4	Bob Hovey	Turkey Point Nuclear Plant	Scoping Meeting (ML010120120)
5	Liz Thompson	Turkey Point Nuclear Plant	Scoping Meeting (ML010120120)
6	Dennis Moss	Miami-Dade County	Scoping Meeting (ML010120120)
7	Otis Wallace	Florida City	Scoping Meeting (ML010120120)
8	Chuck Lanza	Dade County Emergency Management	Scoping Meeting (ML010120120)
9	Steve Shiver	City of Homestead	Scoping Meeting (ML010120120)
10	Robert Epling	Community Bank of Florida	Scoping Meeting (ML010120120)
11	Joette Lorion	Public	Scoping Meeting (ML010120120)
12	Joe Wasilewski	Natural Selections	Scoping Meeting (ML010120120)
13	Ginny O'Shaben	Audubon of Florida	Scoping Meeting (ML010120120)
14	Angie Howard	Nuclear Energy Institute	Scoping Meeting (ML010120120)
15	Reverend Ted Greer	Goulds Coalition of Ministers/Lay Peoples	Scoping Meeting (ML010120120)
16	Dick Bauer	TIP Bank of the Keys	Scoping Meeting (ML010120120)
17	David Balch	United Way of Miami-Dade	Scoping Meeting (ML010120120)
18	Jerry Brown	Florida International University	Scoping Meeting (ML010120120)

<b>Commenter ID</b>	<b>Commenter</b>	<b>Affiliation (If Stated)</b>	<b>Comment Source and ADAMS Accession Number</b>
19	Ruben Rothschild	Scout Leader and FPL	Scoping Meeting (ML010120120)
20	William Weaver	Public	Scoping Meeting (ML010120120)
21	Colonel William Comber	Homestead Air Reserve Station	Scoping Meeting (ML010120120)
22	Mario Signorello	Homestead Challenge	Scoping Meeting (ML010120120)
23	Joe Brennan	IBEW, Local 359	Scoping Meeting (ML010120120)
24	Debra Vase	Florida Power and Light	Scoping Meeting (ML010120120)
25	Charles Munz	Redland Company	Scoping Meeting (ML010120120)
26	Thomas Cullen	Monroe County Emergency Management	Scoping Meeting (ML010120120)
27	Linda Canzanelli	Biscayne National Park - National Park Service	Email comments (ML010110444)
28	Joette Lorion	Public	Email comments (ML010110444)
29	Mark Oncavage	Public	Email comments (ML010110444)
30	Bo Bollinger	Homestead Hospital	Scoping Meeting (ML010120120)
31	George DeFazio	The Earth's Cure Informer	Scoping Meeting (ML010120120)
32	David Balch	United Way of Miami-Dade	Scoping Meeting (ML010120120)
33	Irene Toner	Monroe County Department of Emergency Management	Scoping Meeting (ML010120120)
34	Paige Latterner	Keys Gate Development	Scoping Meeting (ML010120120)
35	Tim Williams	Public	Scoping Meeting (ML010120120)
36	Ruben Rothschild	Scout Leader and FPL	Scoping Meeting (ML010120120)
37	Len Anthony	Condominium Association Naranja Lakes Condo #5	Scoping Meeting (ML010120120)
38	Mike Pedrianes	International Brotherhood of Electrical Workers Local 359	Scoping Meeting (ML010120120)
39	Mike Richardson	First National Bank of Homestead	Scoping Meeting (ML010120120)
40	Allen Bennett	Mutineer Restaurant	Letter (ML010120120)
41	Robert L. Epling	Community Bank of Florida	Letter (ML010120120)
42	Eric S. Johnson	Community Bank Florida	Letter (ML010120120)

<b>Commenter ID</b>	<b>Commenter</b>	<b>Affiliation (If Stated)</b>	<b>Comment Source and ADAMS Accession Number</b>
43	Board of Directors	Greater Homestead/Florida City Chamber of Commerce	Letter (ML010120120)
44	Betty Thomas	Dade County Public School	Scoping Meeting (ML010120120)
45	Captain Bowe	Homestead Police Department	Scoping Meeting (ML010120120)
46	Colonel William Comber	Homestead Air Reserve Station	Scoping Meeting (ML010120120)
47	Steve Garrison	Florida Nurserymen and Growers Association	Scoping Meeting (ML010120120)
48	Walter L. Campbell	First Baptist Church of Florida City	Scoping Meeting (ML010120120)
49	Mary Finlan	Greater Homestead/Florida City Chamber of Commerce	Scoping Meeting (ML010120120)
50	Katy Olesen	Public	Scoping Meeting (ML010120120)
51	Buddy Howamitz	IBEW Local 349	Scoping Meeting (ML010120120)
52	Hayden Blaylock	Blaylock Oil Company	Scoping Meeting (ML010120120)
53	Alex Penelas	Miami-Dade County	Scoping meeting (ML010120120)
54	Liz Thompson	Turkey Point Nuclear Plant	Scoping Meeting (ML010120120)
55	Bob Hovey	Turkey Point Nuclear Plant	Scoping Meeting (ML010120120)
56	Angie Howard	Nuclear Energy Institute	Scoping Meeting (ML010120120)
57	Joette Lorion	Public	Letter (ML003771954)

**Turkey Point, Units 3 and 4  
Public Scoping Meeting and Written Input  
Comments and Responses**

The following pages summarize the comments and suggestions received as part of the scoping process, and discuss their disposition. Parenthetical numbers after each comment refer to the Commenter ID number and the comment number. Comments can be tracked to the commenter and the source document through the ID number listed in Table 1. Comments are grouped by category. The categories are as follows:

1. General Comments in Support of License Renewal and its Processes
2. General Comments in Opposition to License Renewal and its Processes
3. Comments in Support of License Renewal at Turkey Point Units 3 and 4
4. Comments in Opposition to License Renewal at Turkey Point Units 3 and 4
5. Comments Concerning Category 1 Groundwater Use and Quality Issues
6. Comments Concerning Category 1 Socioeconomic Issues
7. Comments Concerning Category 1 Air Quality Issues
8. Comments Concerning Category 1 Land Use Issues
9. Comments Concerning Category 1 Human Health Issues
10. Comments Concerning Category 1 Terrestrial Resource Issues
11. Comments Concerning Category 1 Postulated Accident Issues
12. Comments Concerning Category 1 Uranium Fuel Cycle and Waste Management Issues
13. Comments Concerning Category 2 Aquatic Ecology and Threatened and Endangered Species Issues
14. Comments Concerning Category 2 Socioeconomic Issues
15. Comments Concerning Environmental Justice
16. Comments Concerning Related Federal Projects
17. Comments Concerning Alternative Energy Sources
18. Comments Concerning Safety Issues Within the Scope of License Renewal
19. Comments Concerning Issues Outside the Scope of License Renewal: Operational Safety, Emergency Response and Planning, Need for Power, and Other Issues
20. Questions: Water Quality, Postulated Accidents, Aging Management, Operational Safety, Other Issues

**Comments**

**1. General Comments in Support of License Renewal and its Processes**

**Comment:** Nuclear power provides about 20 percent of America's electricity and that is produced by 103 commercial plants situated in similar communities across the nation. (14-1 and 56-1)

**Comment:** This industry has focused on safety, and that safety has lead to groundwork for continued safe, reliable, and cost-effective operation of the nuclear plants. (14-2 and 56-2)

**Comment:** Nuclear energy ensures U.S. energy security. It lessens our dependence on foreign oil. (14-4 and 56-4)

**Comment:** Don't bring in another quasi-judicial group or entity; you have a solid process for evaluating relicensing. (35-1)

**Response:** *The comments are noted. The comments are supportive of license renewal and its processes, and are general in nature. The comments provide no new information, therefore, they will not be evaluated further.*

## **2. General Comments in Opposition to License Renewal and its Processes**

**Comment:** The current two-prong process of evaluating safety separately from environment is not consistent with the NEPA process. (11-4)

**Comment:** Prepare an Environmental Statement over the next 12 years, and look at all the issues, and then go on if you deem it acceptable and re-license the plant. (11-5)

**Comment:** The issue of pressure-vessel integrity at Turkey Point and does this reactor have the integrity it needs to have. This needs to be added to the NEPA process because it is important to safety and to economics. (11-9)

**Comment:** NRC needs to remove the generic approach because there are issues with coastal reactors about how radiation accumulates in the environment. (11-12)

**Comment:** This process must comply with the Endangered Species Act. Within a 50-mile radius at Turkey Point there are probably 60 endangered and threatened species because it is a major ecosystem. (11-8)

**Comment:** The growing population in South Florida continues to mushroom. The health and safety of the public and removing them in sufficient time during an accident needs to be addressed. This is not a Category 1 issue. (11-17)

**Comment:** The bifurcated, simultaneous NRC relicensing process does not comply with the National Environmental Policy Act (NEPA). The NRC's failure to prepare a site-specific SEIS and take the requisite "hard look" necessary to evaluate the consequences of this major Federal action and alternatives to the proposed action prior to commencing the relicensing process under 10 CFR Part 54 prejudices the process and will not result in the "hard look" that NEPA requires. (28-1)

**Comment:** General opposition to the renewal process, asserting that a site-specific SEIS is required rather than a generic process under NEPA. (28-2)

**Comment:** Under NEPA, the licensee must assess any current impact that radiation may be having on the environment surrounding the plant in order to assess the cumulative impact that may result from extending the operating license. (28-15)

**Comment:** NRC's failure to prepare a full and objective site-specific EIS prior to conducting the license renewal process is an irretrievable commitment of resources designed to prejudice the process and does not comply with the spirit or intent of NEPA. (57-2)

**Comment:** NRC's failure to prepare a site-specific SEIS is designed to rubber stamp its predetermined decision and deprives the public of their statutory rights under NEPA. (57-4)

**Response:** *The comments are noted. These comments oppose license renewal and its processes in general, but do not provide new information. The Commission has established a process, by rule, for the environmental and safety reviews to be conducted to review a license renewal application. While the comments listed above criticize the process, they do not raise any issues within the scope of license renewal. A challenge to the Commission's regulations is outside the scope of the SEIS. Therefore, the comments regarding opposition to license renewal and its processes will not be evaluated further. To the extent that the comments address other issues, these comments will be addressed in the appropriate section(s) of this document.*

### **3. Comments in Support of License Renewal at Turkey Point Units 3 and 4**

**Comment:** The employees are active in the community and support community programs. (2-3)

**Comment:** They have a good safety record and training program. (2-4)

**Comment:** Turkey Point supplies a source of safe, clean, reliable, and inexpensive power to the people of South Florida. (4-1 and 55-1)

**Comment:** Turkey Point has demonstrated high levels of safety and reliability. Turkey Point is the only plant in the United States to ever receive three consecutive superior ratings for safety performance from the agency that regulates it, the Nuclear Regulatory Commission. (4-2 and 55-2)

**Comment:** Florida Power and Light and our employees have worked hard to be good neighbors in all the communities we serve. (4-3 and 55-3)

**Comment:** Turkey Point staff are a highly trained, professional group of employees. (5-1 and 54-1)

**Comment:** Turkey Point has been a good neighbor of the community. (6-1)

**Comment:** Turkey Point Nuclear Plant supplies clean, low cost and reliable energy. (8-1)

**Comment:** The plant has very good safety preparedness, and has worked well with the county through numerous hurricanes in the past. (8-2)

**Comment:** Turkey Point employees are good citizens, stepping up to the plate in many ways. (9-1)

**Comment:** The plant has 3 consecutive years of ratings of superior safety. (9-2)

**Comment:** Turkey Point is a good corporate partner with the community, and has a strong interaction of the employees with civic activities. (10-1)

**Comment:** There is mutual benefit between the community, the power plant, and the environment. (12-2)

**Comment:** Turkey Point is committed to safety, and the Goulds Coalition is satisfied with that commitment. (15-1)

**Comment:** Turkey Point has over 6.5 million work hours without a lost-time accident, and pays attention to safety and security. (16-2)

**Comment:** Turkey Point has a culture of safety, with over 6.5 million man hours worked without a lost-time accident. (19-1)

**Comment:** Turkey Point provides facilities for Boy Scouts to obtain Atomic Energy Merit Badges, to camp onsite, and to train other Scout leaders. (19-2)

**Comment:** Turkey Point supplies regular power to the Air Reserve Station and many of the employees are reservists at the Station. The Reserve Station has used their training facilities. They are a good neighbor. (21-1)

**Comment:** Turkey Point and FPL are part of the community. They help put on the Homestead Challenge baseball tournament each Spring. (22-1)

**Comment:** Turkey Point has an outstanding record of safety, both personnel and nuclear. (23-1)

**Comment:** Turkey Point has a strong commitment to the environment and to safety. They are monitored by the State of Florida and meet Federal standards. (24-1)

**Comment:** Turkey Point supports both the community and the employees financially. The cooling canals are also a good place to watch crocodiles and birds. (25-1)

**Comment:** Turkey Point plant personnel have an excellent safety record and are well trained. This frees up the personnel's time for other emergency management functions. (26-4)

**Comment:** 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 the Turkey Point plant. (27-17)

**Comment:** Turkey Point has a good record of preserving the environment. (33-3)

**Comment:** Safety issues are taken very seriously by FPL and the facility at Turkey Point. (33-4)

**Comment:** Turkey Point has put into place an atmosphere, a culture of plant personal safety. (36-1)

**Comment:** Turkey Point provides facilities for Boy Scouts to learn about the environment and atomic energy. (36-2)

**Comment:** FPL employees live and spend money in the community. FPL has protected and enhanced the environment, and has a safety record cited many times by NRC as one of the safest and most reliable in the country. (37-3)

**Comment:** The commenter was impressed with the personnel handling system. (37-4)

**Comment:** Turkey Point is rated as one of the safest and most reliable nuclear power plants in the industry. (38-2)

**Comment:** The Mutineer Restaurant supports relicensing of Turkey Point. They are a good neighbor and safe. (40-1)

**Comment:** Turkey Point has a strong commitment to protecting the environment. (41-2)

**Comment:** The commenter supports Turkey Point relicensing because of a strong safety and job creation record. They have a civic commitment. (42-1)

**Comment:** The Chamber of Commerce supports relicensing because of low cost power and the number of jobs in the community, and commitment to safety. (43-1)

**Comment:** The commenter supports Turkey Point relicensing because of safety and environmental commitments. (44-1)

**Comment:** The commenter supports relicensing of Turkey Point. They are a good neighbor and committed to safety. (45-1)

**Comment:** The commenter gave general support for Turkey Point license renewal. They provide reliable power to the Homestead Air Reserve Station. (46-1)

**Comment:** The commenter supports Turkey Point relicensing. It is clean, economical, and provides dependable electricity. (47-1)

**Comment:** The commenter supports relicensing of Turkey Point. They have facilities to interact with the ecology, and they have good people working for them. The commenter feels safe at the plant and living close by. (48-1)

**Comment:** ...Supports relicensing of Turkey Point because of the number of jobs it creates and the power it produces. (49-1)

**Comment:** The commenter gave general support for relicensing of Turkey Point. The commenter believes in the security at the plant and what they do for the community. (50-1)

**Comment:** The commenter supports Turkey Point relicensing. They have an excellent safety record, strong safety training requirements, and give a lot to the community. (51-1)

**Comment:** FPL and Turkey Point are truly good neighbors, dedicated to safety and the environment, efficiency, and community involvement. The commenter supports relicensing of the plant. (52-1)

**Response:** *The comments are noted. The comments are supportive of license renewal at Turkey Point Units 3 and 4, and are general in nature. The comments provide no new information, therefore, the comments will not be evaluated further.*

#### **4. Comments in Opposition to License Renewal at Turkey Point Units 3 and 4**

**Comment:** Operation of this aged and embrittled nuclear power plant beyond its original license will cause more radioactive fission products to accumulate and could increase the probability and consequences of a nuclear accident, threatening injury to herself, her family and the ecosystem of South Florida. (57-1)

**Response:** *The comment is noted. This comment opposes license renewal at Turkey Point Units 3 and 4, does not provide new information, and is not within the scope of 10 CFR Part 51 for the environmental review associated with the application for license renewal at Turkey Point. Therefore, the comment will not be evaluated further in this SEIS. To the extent that this comment pertains to managing the effects of aging on components and structures specified in 10 CFR 54.21 during the period of extended operation to ensure functionality, it will be addressed in the parallel safety review.*

#### **5. Comments Concerning Category 1 Groundwater Use and Quality Issues**

As stated in 10 CFR Part 51, Table B-1, Category 1 water quality issues include:

- Groundwater use conflicts (potable and service water; plants that use <100 gpm)
- Groundwater quality degradation (Ranney wells)
- Groundwater quality degradation (saltwater intrusion)
- Groundwater quality degradation (cooling ponds in salt marshes)

**Comment:** The Supplemental EIS should investigate ways to reserve some of the adverse impacts to mainland and near shore habitats under the proposed action and all alternatives. Specifically, the area south and southwest of the plant 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. Rehydrating the hypersaline marshes with fresh water is one example of potential mitigation to be considered during the analysis. (27-14)

**Response:** *The comment is noted. The groundwater flow in the vicinity of Turkey Point is controlled by precipitation and tidal action. Any exchange of water between the cooling canals and the groundwater would not alter the groundwater flow significantly, but may alter sheet runoff. This is a Category 1 issue that was considered in the GEIS. The comment provides no new information. Therefore, the issue will not be evaluated further.*

#### **6. Comments Concerning Category 1 Socioeconomic Issues**

As stated in 10 CFR Part 51, Table B-1, Category 1 socioeconomic issues include:

- Public services: public safety, social services, and tourism and recreation
- Public services, education (license renewal term)
- Aesthetics impacts (refurbishment)

- Aesthetics impacts (license renewal)
- Aesthetics impacts of transmission lines (license renewal term)

**Comment:** The Supplemental EIS should investigate ways to minimize the facility's current intrusions to "old Florida's" natural landscape and scenic vistas. A mitigation option to consider under the proposed action and all alternatives may include repainting the structures in natural tones that mirror the surrounding landscape, and consequently make them less obtrusive to the natural setting. (27-11)

**Response:** *The comment is noted. The comment suggests that mitigation measures be introduced to repaint the structures to make them less obtrusive. Aesthetic impacts were evaluated in the GEIS and determined to be a Category 1 issue. Aesthetic impacts of Units 1 and 2 (the fossil units) are outside the scope of the SEIS for Turkey Point. However, the information regarding the impact of Turkey Point structures on the natural landscape and scenic vistas will be discussed in Chapter 4 of the SEIS. Evaluation of the impacts of potential alternatives to license renewal at Turkey Point will be provided in Chapter 8 of the SEIS.*

**Comment:** The Service is interested in working with FPL to minimize the excessive lighting of the Plant from dusk to dawn. This is a fragile resource critical to wildlife that is sought after by many visitors and residents. (27-12)

**Comment:** The Supplemental EIS should include mitigation options for the night sky under the proposed action and all alternatives. (27-13)

**Response:** *The comments are noted. The comments suggest that mitigation measures be introduced to reduce the impact of Turkey Point lighting on the night sky. Aesthetic impacts of Units 1 and 2 (the fossil units) are outside the scope of the SEIS for Turkey Point. However, the information regarding the proximity of the national park to Turkey Point Units 3 and 4, and resulting impacts on the natural landscape of the park will be discussed in Section 4 of the SEIS.*

**Comment:** 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 the 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. (27-3)

**Comment:** The supplemental EIS should include the natural soundscape of the park as part of the "affected environment" when identifying impacts and any potential mitigation for such impacts. (27-4)

**Response:** *The comments are noted. The comments refer to potential noise impacts from operation of the Turkey Point facility. The noise generated by operations associated with Turkey Point Units 1 and 2 (the fossil units) are not within the scope of the SEIS. The noise associated with Units 3 and 4 during the relicensing term will be considered in Section 4 of the SEIS.*

**Comment:** There is a concern that there will be a socioeconomic impact if you go along a path where you re-license a plant that will later shut down earlier than people think. (11-20)

**Response:** The comment is noted. Socioeconomic issues will be addressed in Section 4.2 of the SEIS. Decommissioning socioeconomic impacts, designated as a Category 1 issue, will be addressed in Section 7 of the SEIS.

## **7. Comments Concerning Category 1 Air Quality Issues**

As stated in 10 CFR Part 51, Table B-1, Category 1 air quality issues include:

- Air quality effects of transmission lines

**Comment:** Turkey Point will keep air quality high with no emissions. (5-5 and 54-5)

**Comment:** Nuclear electricity is produced without producing any greenhouse gases or other air pollutants. (14-3 and 56-3)

**Response:** The comments are noted. Air quality impacts from plant operations were evaluated in the GEIS and found to be minimal. These emissions are regulated through permits issued by the U.S. Environmental Protection Agency and the States. Air quality effects of transmission lines is a Category 1 issue as evaluated in the GEIS. The comments provide no new information and, therefore, will not be evaluated further.

**Comment:** The National Park Service is concerned about the continued introduction of anthropogenic air pollutants and particulate matter into an area of special concern. (27-5)

**Comment:** The Supplemental EIS should identify the cumulative effect associated with projected population growth and continued and increasing emissions under the proposed action and all alternatives. Mitigation measures, including air scrubbers and other similar technologies should be fully evaluated and implemented. (27-6)

**Response:** The comments are noted. Air quality impacts from plant operations were evaluated in the GEIS and found to be minimal. These emissions are regulated through permits issued by the U.S. Environmental Protection Agency and the States. Air quality effects of transmission lines is a Category 1 issue as evaluated in the GEIS. Emissions at Turkey Point are largely associated with Units 1 and 2 (the fossil units), which are not under NRC regulation. Emissions associated with Units 3 and 4 (the nuclear units) are governed by Permit Number 0250003-002-AV issued by the State of Florida Department of Environmental Protection. Impacts of emissions from fossil-fueled alternative forms of generation will be discussed in Section 8 of the SEIS. The comments provide no new information and, therefore, will not be evaluated further.

## **8. Comments Concerning Category 1 Land Use Issues**

As stated in 10 CFR Part 51, Table B-1, Category 1 land use issues include:

- Onsite land use during license renewal term and refurbishment
- Power line rights-of-way

**Comment:** FPL owns, maintains, and uses some 20 thousand acres to sustain both the plant and the status quo of the environment for the sustenance of the flora, fauna and land. (37-5)

**Response:** *The comment is noted. Onsite land use during the renewal period is a Category 1 issue as evaluated in the GEIS. Applicable site descriptive information, such as the amount of acreage for the plant, will be included in Section 2 of the SEIS.*

## **9. Comments Concerning Category 1 Human Health Issues**

As stated in 10 CFR Part 51, Table B-1, Category 1 human health issues include:

- Radiation exposure to the public during refurbishment
- Occupational radiation exposure during refurbishment
- Microbiological organisms (occupational health)
- Noise
- Radiation exposures to public (license renewal term)
- Occupational radiation exposures (license renewal term)

**Comment:** There is a need to look at the cumulative impacts of any radiation that may be building up in the cooling canals outside in Biscayne National Park, say cesium-137 and strontium-90. Asks to test shellfish from Biscayne Bay for occurrence of strontium-90. (11-13)

**Comment:** Emissions from nuclear plants, even if within regulatory limits, may be adversely affecting public health. (18-3)

**Response:** *The comments are noted. To the extent that these comments question the radiological protection afforded by NRC regulations, radiation doses to the public during the license renewal term are a Category 1 issue as evaluated in the GEIS. The evaluation of health effects of radiation, both natural and man-made, is an ongoing activity involving public, private, and international institutions. The assessment of health effects upon which the GEIS analysis is based was founded on the consensus of these sources. No changes in that consensus have occurred since the GEIS was completed. Further, the staff is not aware of any new information or studies that call into question the conclusions in the GEIS. Therefore, the comments will not be evaluated further.*

**Comment:** NRC needs to remove the generic approach because there are issues with coastal reactors about how radiation accumulates in the environment. (11-12)

**Comment:** Radiological releases from the steam generation system, if they are impacting humans, must also be impacting the plants and wildlife of the area. (18-4)

**Comment:** The NRC should address the impacts that radioactive emissions from the plant during routine operations have had and may continue to have in the future on wildlife and the human environment. (28-5 and 57-8)

**Comment:** Under NEPA, the licensee must assess any current impact that radiation may be having on the environment surrounding the plant in order to assess the cumulative impact that may result from extending the operating license. (28-15)

**Comment:** NRC must analyze the impact of the potential increase in radiation that Turkey Point is having on the cooling canals and the aquatic and human environment surrounding the plant. (57-16)

**Response:** *The comments are noted. Radiation exposures to the public during the license renewal term is a Category 1 issue that was evaluated in the GEIS. NRC considers public protection from radiological doses also to be protective of terrestrial and aquatic organisms. Public doses from Turkey Point emissions were specifically evaluated in Section 4.6 of the GEIS, using data from monitored emissions and ambient monitoring. The comments do not detail specific issues associated with coastal reactors, provide no new information, and, therefore, will not be evaluated further.*

**Comment:** The Tooth Fairy Project, by the Radiation and Public Health Project, states that researchers had found that strontium-90 radiation levels in baby teeth of Miami-Dade County children are twice as high as in other areas of the country. This increase is found within a 50 mile radius of Turkey Point Nuclear Power Plant. (13-1)

**Comment:** NRC should sponsor Federal funds to test for strontium-90 in baby teeth. (13-2)

**Comment:** The EIS should include a mandate to assess health effects of radioactive emissions and strontium-90 in baby teeth. (13-3)

**Comment:** Strontium-90 concentrations in baby teeth have not changed since the 50's, and the concentrations in Dade County were higher than the other areas studied. Strontium-90 is considered an indicator of other radionuclides released from steam-generated degradation of reactor systems. (18-2)

**Response:** *The comment is noted. Radiation exposures to the public during the license renewal term is a Category 1 issue and was evaluated in the GEIS. Although the referenced report was not available at the time that the GEIS was written, the comment does not represent new information with regard to the Category 1 issue as evaluated in the GEIS because the study does not identify a significant departure from what was specifically documented in the GEIS with regard to public dose. Therefore, the comment will not be evaluated further.*

**Comment:** There is new evidence of a link between strontium-90 and other radioisotopes in the environment and increases in breast, prostate, and childhood cancer rates. A study published by the Radiation and Public Health Project in 1996 identified a higher breast cancer mortality rate for 1985-1989 in women living within 100 miles of a nuclear reactor relative to a base period in the 50's. Turkey Point's rate was 26% higher during the 80's, vs. a U.S. average of 1% increase. In areas where nuclear plants have shut down, rates of childhood cancers, low birth rates and infant mortality rates have all improved. All this suggests that low dose rates over protracted intervals are a significant factor in the current cancer epidemic and other illnesses. (18-1)

**Response:** *The comment is noted. Radiological exposures to the public during the license renewal term is a Category 1 issue that was evaluated in the GEIS. Doses to members of the public from Turkey Point emissions were specifically evaluated in Section 4.6 of the GEIS, using data from monitored emissions and ambient monitoring, and were found to be well within regulatory limits. The staff has reviewed the 1996 study and concludes that it provides no new evidence that links strontium-90 with increases in breast cancer, prostate cancer, or childhood cancer rates. The American Cancer Society recognizes that "public concern about environmental cancer risks often focuses on risks for which no carcinogenicity has been proven or on situations where known carcinogen exposures are at such low levels that risks are*

*negligible. Ionizing radiation emissions from nuclear facilities are closely controlled and involve negligible levels of exposure for communities near such plants.” The comment provides no new information and, therefore, will not be evaluated further.*

**Comment:** NRC needs to look at the epidemiological studies about the health of the surrounding population around Turkey Point in terms of cancer. (11-14)

**Comment:** NRC and FPL should conduct an epidemiological study, a biological study of strontium-90 in teeth, and a medical study to see if radiation released from Turkey Point is contributing to cancer in the community. (18-5)

**Comment:** High incidence rates of cancer in the Dade county area may well be due to the high incidence of old persons and people moving from areas of the country with health problems. Strontium-90 may come from weapons-grade nuclear weapons materials and not nuclear power plants. (26-3)

**Comment:** Long Island has one of the highest rates of breast cancer. Gaseous radioactive tritium had been released from the stack at the reactor for 40 years. So look into what is going on at Turkey Point. (31-1)

**Response:** *The comments are noted. Radiation exposures to the public during the license renewal term is a Category 1 issue as evaluated in the GEIS. At the request of Congress, the National Cancer Institute (NCI) conducted a study in 1990, “Cancer in Populations Living Near Nuclear Facilities,” to look at cancer mortality rates around 52 nuclear power plants, including Indian Point, nine Department of Energy facilities, and one former commercial fuel reprocessing facility. The NCI study concluded “from the evidence available, this study has found no suggestion that nuclear facilities may be linked causally with excess deaths from leukemia or from other cancers in populations living nearby.” Additionally, the American Cancer Society has concluded that although reports about cancer case clusters in such communities have raised public concern, studies show that clusters do not occur more often near nuclear plants than they do by chance elsewhere in the population. The comments provide no new information, therefore, the comment will not be evaluated further.*

**Comment:** The SEIS should also review groundwater/drinking water pathways and the unique fact that the Biscayne Aquifer is an EPA designated sole source drinking water supply for millions of people in South Florida. (28-8)

**Response:** *The comment is noted. The comment expresses concern regarding the levels of protection afforded by NRC radiological emissions standards. Radiation exposures to the public during the license renewal term is a Category 1 issue as evaluated in the GEIS. The comment provides no new information and, therefore, will not be evaluated further.*

## **10. Comments Concerning Category 1 Terrestrial Resource Issues**

As stated in 10 CFR Part 51, Table B-1, Category 1 terrestrial resource issues include:

- Cooling tower impacts on crops and ornamental vegetation
- Cooling tower impacts on native plants
- Bird collisions with cooling towers

- Cooling pond impacts on terrestrial resources
- Power line rights-of-way management (cutting and herbicide application)
- Bird collisions with power lines
- Impacts of electromagnetic fields on flora and fauna (plants, agricultural crops, honeybees, wildlife, livestock)
- Floodplains and wetland on power line rights-of-way

**Comment:** The National Park Service recommends that the Supplemental EIS consider continued and expanded exotic plant eradication from FPL property for its benefits of removing harmful seed sources. (27-8)

**Response:** *The comment is noted. Impacts on terrestrial resources resulting from continued operation during the renewal period have been evaluated and were designated as a Category 1 issue in the GEIS. The comment provides no new information. This is an operations concern that will be brought to the attention of FPL. The comment will not be evaluated further.*

## 11. Comments Concerning Category 1 Postulated Accident Issues

As stated in 10 CFR Part 51, Table B-1, Category 1 postulated accidents issues include:

- Design basis accidents

**Comment:** Accidents may affect the Biscayne Aquifer, which is the drinking water source for the Miami-Dade county area. (3-9)

**Response:** *The comment is noted. Design basis accidents are a Category 1 issue and were evaluated in the GEIS. The comment provides no new information and, therefore, will not be evaluated further.*

**Comment:** The licensee's projections for the rapidly growing South Florida population that will occur during the extended license period increases risk and requires the licensee to conduct a probabilistic risk assessment that analyzes emergency response capability to determine whether they can meet the requirements of 10 CF. 50.54(a) in the event of an accident and the requirements of 40 CFR Part 190 and the proposed 40 CFR Part 61 to protect the public from potential high and lower level exposures and resultant health risk. Additionally, the environmental impacts, including environmental pathways, that could result from of a severe accident taking place at the Turkey Point plant, a Bay/Ocean plant, must be analyzed in a site-specific SEIS. (28-13)

**Response:** *The comment is noted. Design basis accidents are a Category 1 issue as evaluated in the GEIS. The GEIS analysis does not include the assumption that area population would always remain static. Further, to the extent that the comment concerns emergency planning, such issues were determined by the Commission to be outside of license renewal. Finally, with the exception of a requirement to consider alternative mitigation measures, the Commission has determined that severe accident issues are not within the scope of license renewal. Therefore, this comment will not be evaluated further.*

## 12. Comments Concerning Category 1 Uranium Fuel Cycle and Waste Management Issues

As stated in 10 CFR Part 51, Table B-1, Category 1 uranium fuel cycle and waste management issues include:

- Offsite radiological impacts (individual effects from other than the disposal of spent fuel and high level waste)
- Offsite radiological impacts (collective effects)
- Offsite radiological impacts (spent fuel and high level waste)
- Nonradiological impacts of the uranium fuel cycle
- Low level waste storage and disposal
- Mixed waste storage and disposal
- On-site spent fuel
- Nonradiological waste

**Comment:** A spent fuel accident at Turkey Point could contaminate 224 square miles. Need to have appropriate response capability, especially under hurricane situations. (11-3)

**Comment:** There is no place to put the high-level nuclear waste and right now there is nuclear waste piling up at Turkey Point. This could create a problem in case of a nuclear-spent-fuel accident and resultant land contamination. (11-15)

**Comment:** The NRC should look at effects of a hurricane hitting the spent fuel pool, especially as the components in the pool age. (11-16)

**Comment:** There is a nuclear waste storage issue. There will be an increase in the amount of nuclear waste we leave our children. NRC needs to test if there will be a potential increase in the surrounding environment to ensure there will be no cumulative impact. (11-18).

**Comment:** The proposed action will result in twenty years of additional operation that will increase the amount of high-level and low-level nuclear waste. Presently, FPL does not have storage space for the additional high-level waste and appears to be uncertain as to disposal of their low-level waste. The storage of these wastes on site for the extended period of operation could increase the risk of an accidental release to the environment in that Turkey Point is located in a hurricane zone rather than a geologically stable area. If it becomes necessary to store these wastes on site because no permanent burial site has been implemented, the storage of this spent fuel on site could also increase the risk and consequences of a spent fuel pool accident depending on the storage method. The licensee should be required to demonstrate that they can permanently and safely dispose of both their high level and low-level nuclear waste off-site for the extended operation of the plant. Additionally, the NRC should analyze the potential environmental impact of such a potential accident in a site-specific SEIS. (28-14)

**Comment:** Relicensing will create more nuclear waste and radioactive byproducts that could adversely impact the environment, especially as repositories close. (57-15)

**Response:** *The comments are noted. Uranium fuel cycle impacts are Category 1 issues as evaluated in the GEIS. The comments provide no new information and, therefore, will not be evaluated further.*

**13. Comments Concerning Category 2 Aquatic Ecology and Threatened and Endangered Species Issues**

As stated in 10 CFR Part 51, Table B-1, Category 2 aquatic ecology and threatened and endangered species issues are:

- Entrainment of fish and shellfish in early life stages
- Impingement of fish and shellfish
- Heat shock
- Threatened or endangered species

**Comment:** It is estimated that approximately 70% of the increase in population of the American Crocodile in South Florida is due to the preservation efforts of FPL in the cooling canal system. (5-3 and 54-3)

**Comment:** Beneficial coexistence of Turkey Point and the environment. The plant site gave some of the land to the National Park's Service to help establish Biscayne National Park. Over 13,000 acres of that property is undeveloped, and is part of the Everglades Mitigation Bank. FPL is restoring this to its natural state and maintaining the land for the protection and preservation of the environment. (5-2 and 54-2)

**Comment:** They have worked with the county government to protect some of the environmentally endangered lands in the community. (6-4)

**Comment:** The Turkey Point Plant is also environmentally sensitive. The 13,000 acres that have been set aside for mitigation are evidence of the commitment to protect the environment. (7-3)

**Comment:** We have one of the only crocodile natural habitats in this area, and that says a lot about the dedication of the Turkey Point Plant and the employees to making sure the environment can coexist with this facility. (9-3)

**Comment:** The cooling canal systems are a unique habitat and would not exist in this day and age. It provides a home for the American crocodile. (12-1)

**Comment:** The lands associated with the Turkey Point Plant have the ability to benefit or harm many of the critical species (threatened and endangered) of South Florida. (27-7)

**Comment:** The Supplement EIS should 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. (27-9)

**Comment:** 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. (27-10)

**Comment:** The water cooling in the canals is not interconnected to the adjacent fragile Biscayne Bay. The extensive both marshy and dry land provide much wildlife habitat for birds, varmints and so forth. Part of the land even provides the community an open and sheltered picnic area. (37-6)

**Comment:** Cooling pond system provides a warm ecosystem for wintering birds and wildlife, and protects the American crocodile. (40-4)

**Comment:** The Turkey Point employees have developed a unique stewardship of the environment in the region surrounding the plant by preserving the natural habitat surrounding the plant, providing homes to many endangered species, including the American crocodile. (53-2)

**Response:** *The comments are noted. The comments acknowledge the importance of the manner in which FPL operates the site to the benefit of threatened and endangered species. The appropriate descriptive information regarding the plant-specific ecology of the site will be addressed in Section 2 of the SEIS.*

**Comment:** This process must comply with the Endangered Species Act. Within a 50 mile radius at Turkey Point there are probably 60 endangered and threatened species because it is a major ecosystem. (11-8)

**Comment:** Under the Endangered Species Act, the NRC must consult with the U.S. Fish and Wildlife Service on how the proposed action could adversely impact threatened and endangered species within at least a fifty mile radius of the Turkey Point plant prior to conducting relicensing activities. (28-10)

**Comment:** NRC has not undertaken consultation with the Fish and Wildlife Service for the proposed action. (57-10)

**Response:** *The comments are noted. Threatened and endangered species on the plant site and transmission line rights-of-way will be addressed as a Category 2 issue in Section 4.6 of the SEIS. The staff will conduct appropriate consultation under the Endangered Species Act.*

**Comment:** There are new and significant issues related to the presence of endangered and threatened species in the parks and preserves surrounding the site. (57-6)

**Response:** *The comment is noted, however, the comment fails to identify the new and significant issues related to the presence of threatened and endangered species. Threatened and endangered species within the plant site and the transmission line rights-of-way will be addressed as a Category 2 issue in Section 4.6 of the SEIS.*

#### **14. Comments Concerning Category 2 Socioeconomic Issues**

As stated in 10 CFR Part 51, Table B-1, Category 2 socioeconomic issues are:

- Housing
- Public services: public utilities
- Public services, education (refurbishment)
- Offsite land use (refurbishment)

- Offsite land use (license renewal term)
- Public services, transportation
- Historic and archaeological resources

**Comment:** Turkey Point maintains a wetlands mitigation bank that is used by Homestead and others to offset impacts to wetlands. Loss of the plant will affect the ability to develop. (2-5)

**Response:** *The comment is noted. It addresses a Category 2 issue regarding offsite land use during the license renewal term, and will be evaluated in Section 4.4 of the SEIS.*

**Comment:** Turkey Point is the largest employer in Dade County. Loss would impact 800 employees, and affect the plant's property tax base of \$8 million. There will be a great deal of ancillary job and facility loss if the license is not renewed. (2-2)

**Comment:** Keeping Turkey Point a part of this community is also important to the social and economic well-being of our neighbors, with an estimated economic impact of over \$60 million annually to the local economy, and by the participation of the Turkey Point employees in the community. (5-7)

**Comment:** They are a major provider of jobs in the community. (6-2)

**Comment:** With over 800 employees, just about all our families are some how touched through the connection with Turkey Point Plant. With \$50 billion in payroll multiplied throughout our community, many of our businesses are able to stay afloat and flourish because of the economic impact of this plant. (7-2)

**Comment:** We have employees that are there contributing \$8 million in real estate taxes, \$50 million a year in payroll to this community. (9-5)

**Comment:** Nuclear energy is a source of employment and economic activity that supports families, regional businesses, local governments as they provide residents with essential educational and social services. (14-5)

**Comment:** Turkey Point plays a vital role in the local economy. (15-2)

**Comment:** The 800 or so employees of the plant earn an average of over \$62,000 per year, bringing in a payroll of over \$50 million per year, with another \$10 million in goods and services purchased locally. This makes it possible for TIB to make loans to businesses and residents. (16-1)

**Comment:** Turkey Point staff contribute financially to the community, giving over \$150,000 to the United Way, and have a \$200,000 scholarship for Miami-Dade Community College. Turkey Point staff do a lot of work in the community on a volunteer basis. (17-1)

**Comment:** The economic impact of Turkey Point exceeds the payroll, and may be as high as \$150 to 200 million, because of the re-spending of the income in the local community. (22-2)

**Comment:** Turkey Point union members have donated over \$10,000 to the Miami Cancer and Burn Center over the past 7 years. (23-2)

**Comment:** The paychecks at Turkey Point contribute to the Monroe County service-related fields. (26-1)

**Comment:** The folks at Turkey Point are an essential component of this local economy. They are the largest employer in deep South Dade. (30-1)

**Comment:** Turkey Point is the largest employer in South Dade. (32-1)

**Comment:** Turkey Point facility raised over \$150,000 for the United Way for this community and participate heavily in civic activities. Turkey Point staff is highly involved in the community and have created a \$200,000 fund for scholarships at Miami-Dade Community College. (32-2)

**Comment:** The economic impact of not renewing the license would be devastating to the local community of South Dade and Keys Gate. (34-1)

**Comment:** Contributions from the Turkey Point staff to the United Way affect as many as 450 underprivileged people who are dependent upon their funding and contributions. (35-3)

**Comment:** FPL and its appropriation has another community interest in their direct dollar donations to the local hospital. (37-7)

**Comment:** Turkey Point employs about 800 people. (38-1)

**Comment:** Plant employees use community services and provide income to the city and jobs for residents. (40-2)

**Comment:** Turkey Point is the largest private employer in South Dade, with over 800 employees and annual base salaries of over \$62,000. Economic impacts would be felt in payroll, property taxes, and support of area services. (41-1)

**Comment:** Turkey Point Nuclear Plant is one of the largest employers in the region with over 800 employees and its purchase of local services helps sustain the economy of south Miami-Dade County. (53-3)

**Comment:** Keeping Turkey Point a part of this community is also important to the social and economic well-being of our neighbors. With an estimated economic impact of over \$60 million annually to the local economy, and by the participation of the Turkey Point employees in the community. (54-7)

**Comment:** Nuclear energy is a source of employment and economic activity that supports families, regional businesses, local governments as they provide residents with essential educational and social services. (56-5)

**Response:** *The comments are noted. Socioeconomic issues specific to the plant are Category 2 issues and will be addressed in Section 4.4 of the SEIS. The comments support license renewal at Turkey Point Units 3 and 4.*

## 15. Comments Concerning Environmental Justice

**Comment:** There is a need to look at the impact of re-licensing on Native Americans. The Miccosukee Tribe and Seminoles live within the 50 mile zone of Turkey Point. NRC needs to look at how the re-licensing may impact their culture and way of life. Their culture and whole way of life depends on the natural Everglades system and it not being contaminated. (11-21)

**Comment:** NRC must evaluate environmental justice impacts on the Miccosukee and Seminole Indians. (28-6)

**Response:** *The comments are noted. Environmental Justice is an issue specific to the plant and will be addressed in Section 4.4 of the SEIS. The Miccosukee and Seminole Indians have been offered the opportunity to participate in the scoping process and will be invited to comment on the draft SEIS.*

## 16. Comments Concerning Related Federal Projects

**Comment:** The NEPA analysis should involve the South Florida Ecosystem Restoration Task Force. (11-19)

**Comment:** NRC should ask the Fish and Wildlife Service, the Everglades National Park, Biscayne National Park, the Environmental Protection Agency, and the Army Corps of Engineers to become cooperating agencies on the site-specific EIS, and notify the South Florida Ecosystem Restoration Task Force and their working group of the scope of the proposed action. (57-11)

**Response:** *The comments are noted. Consultation with U.S. Fish and Wildlife under the Endangered Species Act requirements will take place as part of the license renewal evaluation process under NEPA. Other Federal agencies, as appropriate, have been contacted for information. It is not appropriate for these agencies to be cooperating agencies under the proposed action of license renewal, because these other agencies will not be issuing permits or licenses related to the proposed license renewal action.*

**Comment:** There is significant new information at Turkey Point in terms of its significance to this whole area - the whole South Florida area in the Everglades restoration effort. (11-6)

**Comment:** Under NEPA, the NRC must assess whether the proposed action conflicts with the Federal investment in the Everglades Restoration plan. (28-16)

**Comment:** NRC should be aware of the Everglades Restoration Project and the Federal government's commitment to the South Florida ecosystem. (57-3)

**Comment:** Relicensing may be incompatible with restoration of the Everglades and the South Florida ecosystem. (57-17)

**Response:** *The comments are noted. However, the comments fail to explain how the existence of an Everglades restoration effort is significant new information that would require*

*further assessment in the SEIS. The U.S. Army Corps of Engineers Everglades Restoration Project will be invited to provide information as part of the NEPA analysis of this proposed action. The Everglades Restoration Plan will be discussed in Section 2 of the SEIS.*

**Comment:** Government support for Everglades restoration, and the clearly defined Federal interest in the protection of Biscayne National Park, Everglades National Park, the Big Cypress National Preserve, and Miccosukee Indian Reservation, along with the endangered and threatened species that inhabit these lands, changes the likely environmental harms by a “considerable magnitude” and could significantly alter the costs and benefits of the proposed project. (28-3)

**Comment:** There are new and significant issues related to the context of the plant, including the Biscayne National Park, Everglades National Park, Big Cypress National Preserve, Miccosukee Indian Reservation, and the Everglades Restoration Bill. (57-5)

**Response:** *The comments are noted. However, the comments fail to explain how the existence of an Everglades restoration effort is significant and new information that would require further assessment in the SEIS. The appropriate agencies will be contacted to provide information on their perceptions of scoping issues and impacts as a routine fulfillment of Federal responsibilities under NEPA. To the extent that these comments address offsite land use, which is a Category 2 socioeconomic issue, offsite land use will be discussed in Section 2 and 4 of the SEIS.*

## **17. Comments Concerning Alternative Energy Sources**

**Comment:** Nuclear is a good alternative to oil - keeps us from being dependent on foreign oil. (1-1)

**Comment:** Without Turkey Point, a new plant would likely have to be built, and a means for transporting the fuel to the plant would have to be constructed. This could mean constructing a new gas pipeline to the site. Windmills would require over 200,00 acres. A solar park would require over 50,000 acres, and both would be less reliable than Turkey Point. Turkey Point's license renewal is the least impact alternative for providing electricity to the South Florida community. (5-6 and 54-6)

**Comment:** It was calculated that propane gas is three times as expensive as electricity from Turkey Point. (10-2)

**Comment:** Could convert Turkey Point to a natural gas plant. (11-1)

**Comment:** There is a need to do a fair analysis of alternatives so we will not wind up in Dade County without sufficient power if the plant has to be derated or shut down in the future. (11-10)

**Comment:** Renewal of a nuclear plant's license is far more economical than building any type of new electrical facility. (14-6 and 56-6)

**Comment:** Current land use is for a nuclear plant, so there is no need to disturb new land for a new power plant. (16-3)

**Comment:** The nuclear plant produces no soot or greenhouse gases, and has no adverse effect on one of the most sensitive ecological areas in the country. A fossil plant could not do this. (26-2)

**Comment:** The Service is very concerned about the detrimental impacts that will occur without the power production from the nuclear units. 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. (27-16)

**Comment:** The Service is concerned about the alternatives to license renewal and that it 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. These direct and cumulative impacts related to a large-scale development of this character should be fully identified within the Supplement EIS. (27-15)

**Comment:** An objective review of alternatives and their environmental risks could preclude the need to conduct the expensive and time consuming relicensing process by substituting a more environmentally friendly alternative for the operation of this aged nuclear power plant located in one of the most environmentally sensitive areas in the world. (28-9)

**Comment:** Nuclear power is clean. The Tampa Tribune recently published an article on fossil fuel emissions and the FDA is considering having warning labels on deepwater pelagic species such as tuna, shark and swordfish due to fossil-fuel emissions. (30-2)

**Comment:** The alternative to Turkey Point is more power plants in the Keys with their unavoidable impact on the fragile Keys environment. Other alternatives, such as the sun which Monroe County has in abundance, are not ready to power all the air-conditioners, lights, and countless no vacancy signs. (33-1)

**Comment:** Nuclear power is cleaner than other kinds of power. It provides the power they to keep their agricultural business going. (35-2)

**Comment:** It makes sense to extend the license. If these plants were required to shut down, new and possibly more expensive plants would have to be built in order to provide generation capacity required for an ever increasing population in the area. (36-3)

**Comment:** Look at reasonable alternatives. Look at gas-fired generator, fossil-fuel generator, need to be sure that the extension of the license gets us the best way of generating safe, reliable electricity for the community. (39-2)

**Comment:** Nuclear generation is currently the least expensive method of providing electricity to the area, and produces no pollutants to the air, unlike fossil fuels. (40-3)

**Comment:** NRC should evaluate a full study of alternatives, including those that are more environmentally friendly. (57-9)

**Response:** *The comments are noted. Many of the comments support relicensing of Turkey Point. Impacts from reasonable alternatives for the Turkey Point license renewal will be evaluated in Section 8 of the SEIS.*

**Comment:** 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 sea grass recovery by potentially ripping it from the bottom, as well as other vegetation. Turbidity is known to limit the photosynthesis of both the phytoplanktonic and sea grass communities that are essential to a healthy marine ecosystem. (27-1)

**Comment:** FPL should consider the possibility of extending the existing and under-utilized fuel pipeline from the former Homestead Air Force Base to the Power Plant as an alternative. (27-2)

**Response:** *The comments are noted. The comments refer to fuel delivery to the fossil-powered Units 1 and 2. Fuel delivery to the fossil powered units is not within the scope of 10 CFR Part 51 or 54, as fossil plants are not subject to NRC regulation. The analysis of alternatives in Section 8 of the SEIS will include the possibility of replacing the nuclear plants by alternative types of generation, including fossil plants. Section 8 will evaluate the impacts associated with pipelines needed to support alternative forms of generation and the impacts of barge delivery on the Biscayne Bay water quality and ecology.*

## **18. Comments Concerning Safety Issues Within the Scope of License Renewal**

**Comment:** The issue of pressure-vessel integrity at Turkey Point and does this reactor have the integrity it needs to have. This needs to be added to the NEPA process because its important to safety and to economics. (11-9)

**Comment:** There is an issue with hurricanes and aging equipment that could increase the risk probability and magnitude of a radiological accident. (11-11)

**Comment:** Need to be sure pressure vessels have the strength and the capacity to continue to operate for another 20 years. (39-1)

**Comment:** The NRC should require that the licensee perform an analysis based on plant-specific surveillance capsule test data, and plant-specific operating history, for both Turkey Point Units 3 and 4, because the rate at which the beltline weld material deteriorates and/or embrittles is plant specific. Such a plant-specific analysis is necessary to prove that an acceptable margin of safety exists for the reactor vessels in both Turkey Point Units 3 and 4 that will enable them to meet the requirements of 10 CFR 50.61 and 10 CFR (c)(1)(ii) during the period of extended operation, because the additional twenty years of operation will cause increased neutron radiation damage to the reactor vessel welds that could further decrease the margin of safety, thereby increasing the probability that a pressurized thermal shock event and resultant meltdown could take place at Turkey Point Unit 3 or 4, either as a result of an internal event or an external event, such as a hurricane, if fracture toughness is not maintained. In the event that such an accident occurs in a hurricane in which emergency response capability is curtailed or restricted, the consequences to the public could also be increased. (28-11)

**Comment:** The age-related degradation of multiple components could increase the chance that several components in the reactor and/or spent fuel pool, could fail simultaneously during a hurricane, thereby reducing the margin of safety of the plant and increasing the probability of an age-related accident and resultant radiological emergency that would have an extremely adverse impact on the human environment. The probability of a hurricane's (including a beyond design basis hurricane's) impact on deteriorated plant structures and components and its contribution to risk should be analyzed and discussed in quantitative terms by the licensee in their application or environmental report to meet the requirements of 10 CFR 50.4(a)(1) and also in a site-specific SEIS under NEPA. (28-12)

**Comment:** Operation of this aged and embrittled nuclear power plant beyond its original license will cause more radioactive fission products to accumulate and could increase the probability and consequences of a nuclear accident, threatening injury to herself, her family and the ecosystem of South Florida. (57-1)

**Comment:** NRC should ensure that the licensee conduct Charpy tests of the pressure vessel welds, because an embrittled pressure vessel would be subject to multiple failures of aging components, including that induced by a hurricane. NRC should evaluate whether multiple-component failure is more likely in an old facility. (57-12)

**Comment:** Hurricane and aging equipment could increase the risk, probability, and magnitude of a radiological accident. (57-13)

**Response:** *The comments are noted. To the extent that these comments pertain to aging within the scope of license renewal, these issues will be addressed during the parallel safety analysis review performed under 10 CFR Part 54. Aging management issues are outside the scope of 10 CFR Part 51 and will not be evaluated further in this SEIS. The ability to cope with the effects of severe weather, such as hurricanes and tornados, is specifically addressed in the deterministic review conducted prior to issuance of an operating license. This forms part of a plant's licensing basis, which must be met at all times during the operating life of the plant. Weather events more severe than the plant's design basis have been addressed by the licensee in its individual plant examinations of internal and external events (IPE and IPEEE, respectively). These plant-specific risk studies provide baseline estimates of risk from internal and external events. In evaluating severe accident mitigation alternatives (SAMAs), a license renewal applicant uses risk profiles to identify potential means of further reducing risk (through design alternatives that enhance the ability to prevent or mitigate core damage). Section 5.2 of the SEIS will contain the staff's evaluation of SAMAs.*

## **19. Comments Concerning Issues Outside the Scope of License Renewal**

### Operational Safety

**Comment:** Turkey Point has a strong safety record, with superior ratings from NRC. (41-3)

**Comment:** The Turkey Point plant has an impeccable record with regard to safety. (7-4)

**Response:** *The comments are noted. The comments support license renewal at Turkey Point Units 3 and 4. Operational safety is outside the scope of the evaluation under 10 CFR Part 51 and 54. The comments provides no new information and, therefore, will not be evaluated in the SEIS.*

### Emergency Response and Planning

**Comment:** Concerned about operating an old nuclear plant for 20 years beyond its original license, and resultant safety impacts from an accident need to be looked at. The worst case accident could kill 29,000 people in a 20 mile radius of the plant and contaminate an area within at least 70 miles. (11-2)

**Comment:** No emergency response capability was present during hurricane Andrew. Hurricanes occur frequently in the area and NRC must look at effects of one hitting Turkey Point. (11-7)

**Comment:** The growing population in South Florida continues to mushroom. The health and safety of the public and removing them in sufficient time during an accident needs to be addressed. This is not a Category 1 issue. (11-17)

**Comment:** Issues not adequately addressed, or not addressed at all, in the original FES on Turkey Point dated July 1972 or in the licensee's Environmental Report submitted in support of this proposed action include, but are not limited to the following: the intense population growth and ability to evacuate in the case of a hurricane; the siting of Turkey Point in a hurricane zone in light of Hurricane Andrew, the proposed siting of a large commercial airport within five miles of the plant, the siting a few years back of a school two miles from the plant. (28-4)

**Comment:** There are new and significant issues related to safety with regard to population increase in the area, need to evacuate in event of a hurricane, proposed siting of a large commercial airport, and the presence of a school two miles from the plant. (57-7)

**Comment:** The growing South Florida population threatens emergency response capability. (57-14)

**Response:** *The comments are noted. To the extent that the comments raise issues concerning emergency planning, such issues were determined by the Commission to be outside the scope of license renewal. The staff considered the need for a licensing review of emergency planning issues in the context of license renewal during its rulemaking proceedings on 10 CFR Part 54. As discussed in the Statement of Considerations for the rule (56 FR 64966), the Commission stated that the programs for emergency preparedness at nuclear plants apply to all nuclear power plant licensees, and require the specified levels of protection from each licensee regardless of plant design, construction, or license date. These include protection under tornado and hurricane winds. The requirements of 10 CFR 50.47 and Appendix E to 10 CFR Part 50 are independent of the renewal of the operating license, and will continue to apply during the license renewal term. To the extent that the comments challenge the Commission's findings, a challenge to NRC regulations is outside the scope of this SEIS. Therefore, the comments will not be evaluated further.*

### Need for Power

**Comment:** Electricity in the area is affordable because of the Turkey Point nuclear plants. (1-2)

**Comment:** Country is facing an electricity generating shortage, so the loss of Turkey Point will require replacement by another power plant. (2-1)

**Comment:** Florida is growing approximately 2% per year, and the energy demand per year and per customer, is also increasing. (5-4 and 54-4)

**Comment:** They provide most of the electricity for Miami-Dade County. (6-3)

**Comment:** Turkey Point provides efficient and reasonably priced power. (7-1)

**Comment:** Turkey Point power generation addresses the needs of the community without disturbing new lands for new plants. (9-4)

**Comment:** Turkey Point provides reliable, low-cost energy. (16-4)

**Comment:** Must evaluate the reliability of power generating sources if the licensee relies on Turkey Point to meet future power needs and is forced to derate or close the nuclear units due to age-related safety or economic concerns. (28-7)

**Comment:** Turkey Point provides low cost power to Monroe County. (33-2)

**Comment:** Local Air Force Base and other Federal Base realignments, lands have been and will become available for civilian usage. This redevelopment will need electrical service support. (37-1)

**Comment:** Turkey Point provides reliable power at reasonable cost. (37-2)

**Comment:** Miami-Dade County is a growing community with increasing demands for electricity that can be provided by Turkey Point Nuclear Plant. (53-1)

**Response:** *The comments are noted. The need for power is specifically directed to be outside the scope of license renewal (10 CFR 51.95 (c)(2)). The comments are interpreted as expressing support for license renewal at Turkey Point, however, they provide no new information and, therefore, will not be evaluated further.*

### Other Issues

**Comment:** NRC needs to develop a radiological monitoring protocol that identifies how much environmental degradation has happened already in the Turkey Point area due to discharges from the plant. This can then be projected over the 20 years of license renewal. (3-11)

**Comment:** The commenter asks NRC to test shellfish from Biscayne Bay for occurrence of strontium-90. (11-13)

**Comment:** NRC should sponsor Federal funds to test for strontium-90 in baby teeth. (13-2)

**Comment:** NRC and FPL should conduct an epidemiological study, a biological study of strontium-90 in teeth, and a medical study to see if radiation released from Turkey Point is contributing to cancer in the community. (18-5)

**Response:** *The comments are noted. Conducting epidemiological studies and developing a monitoring protocol is outside the scope of 10 CFR Part 51 and 54; the State of Florida performs monitoring under their Radiological Environmental Monitoring Program. Radiological doses to humans are a Category 1 issue and were evaluated in the GEIS. The comment provides no new information and, therefore, will not be evaluated further.*

## 20. Questions

The following comments were presented in the form of questions during the scoping process. The staff will take note of the questions to the extent that the questions apply to the issues discussed in the SEIS. However, the questions did not provide new information and will not be evaluated further.

### Water Quality

**Comment:** The cooling canals are unlined, and the water enters Card Sound and Biscayne Bay at 60 to 150 cubic feet per second. What levels of contaminants are migrating to the Sound, and what is appearing in the inshore marine life of Biscayne Bay National Park? (3-1)

**Comment:** Will the discharge of contaminants to the cooling canals and ultimately to Card Sound increase if Barnwell closes and the Southeast Regional Compact collapses? (3-2)

**Comment:** Do contaminants in the fish and shellfish of Card Sound and Biscayne Bay from Turkey Point discharges pose an unacceptable health risk for consumers of those resources? (3-3)

**Comment:** What are the actual levels of CO<sub>2</sub> production during the fuel fabrication process? (3-6)

**Comment:** What isotopes at what concentrations are present in the water of Lake Warren? (29-3)

**Comment:** What isotopes at what concentrations are present in the sediment of Lake Warren? (29-4)

**Comment:** What volume of water containing radioactive waste, other than condenser cooling water was discharged into Lake Warren in year 2000? (29-5)

**Comment:** What are the daily limits in volume and concentration for each chemical allowed for discharge by the National Pollutant Discharge Elimination System permit? (29-6)

**Comment:** Have there been any requested discharges of toxic chemicals in year 2000? What chemicals, what volume, what concentrations? (29-7)

**Comment:** What are the nonradioactive pollutants present in the water of Lake Warren? What chemicals, what concentrations? (29-8)

**Comment:** What radioactive isotopes have been found in the bay waters outside the Turkey Point plant in year 2000? (29-9)

**Comment:** What nonradioactive pollutants have been found in the bay waters outside the Turkey Point plant in year 2000? (29-10)

**Response:** *The questions are noted. Radiological dose, offsite migration of radionuclides, water quality, and uranium fuel cycle impacts are Category 1 issues that were evaluated in the GEIS. Information from routine monitoring programs are available from the State of Florida Department of Health. The requirements in the National Pollutant Discharge Elimination System permit are set by the State of Florida and are not under the jurisdiction of the NRC. The permit is included as part of the applicant's Environmental Report, and will be discussed in Section 4 of the SEIS. Site description detail will be provided in Section 2.2 of the SEIS. The questions provide no new information and, therefore, will not be evaluated further.*

#### Postulated Accidents

**Comment:** What safety impacts will result from the increased air traffic associated with the proposed change in use of Homestead AFB? (3-7)

**Comment:** If Homestead AFB becomes a space port, what will be the impacts on Turkey Point if a million pounds of liquid hydrogen stored in above-ground tanks near the plant ignite? (3-8)

**Response:** *The questions are noted. The impacts associated with postulated accidents resulting from site hazards are evaluated under 10 CFR Part 50 as part of the licensing design basis. In January 2001, the Department of Defense has announced that it will allow civilian control and development of the former Homestead Air Force Base, provided no future airport is located at that site. Should an airport be proposed near any nuclear power plant in the United States, the hazard to continued operation of the plant would be evaluated. The questions provide no new information and, therefore, will not be evaluated further.*

#### Aging Management

**Comment:** General questions on the reactor vessel: When will the next specimen of reactor vessel material be tested using the Charpy V Notch Test? When will the next specimen of reactor beltline weld material be tested using the Charpy V Notch Test? What conditions would have to be present for the utility to attempt an annealing of the reactor vessel? What is the copper content of the weld material? What is the nickel content of the weld material? What is the projected man rem associated with annealing the reactor vessel? What is the reference temperature for the beltline weld material for the reactor vessel in unit 3? What is the reference temperature for the beltline weld material for the reactor vessel in unit 4? How many times has a pressurized thermal shock event occurred in unit 3? How many times has a pressurized thermal shock event occurred in unit 4? How many times has a station blackout event occurred at Turkey Point? (29-2)

**Response:** *The questions are noted. The questions provide no new information relative to 10 CFR Part 51, therefore, they will not be evaluated further for the SEIS. To the extent that the questions pertain to managing the effects of aging on the components and structures specified in 10 CFR 54.21 during the period of extended operation to ensure functionality, they will be addressed in the parallel safety review.*

#### Operational Safety

**Comment:** General questions on steam generators: What assurances are there that the steam generators will operate until the end of the license renewal period without another replacement? Are the current steam generators the most recent design using the most appropriate materials? What are the differences between the designs? What are the millirem per hour exposure rates for the inside of the channel heads for the 6 steam generators? What will be the projected millirem per hour exposure rates for the inside of the channel heads for the 6 steam generators at the end of the 40-year original license? What are the plans for condenser retubing? What will be the projected millirem per hour exposure rates for the 6 steam generators at the end of the license renewal period? What are the emergency plans for a burst steam generator tube(s) event? (29-1)

**Response:** *The questions are noted. Operational safety is outside the scope of the evaluation under 10 CFR Part 51, therefore, they will not be evaluated further for the SEIS. To the extent that the questions pertain to managing the effects of aging on components and structures specified in 10 CFR 54.21 during the period of extended operation to ensure functionality, they will be addressed in the parallel safety review.*

#### Other Issues

**Comment:** What are the actual levels of CO<sub>2</sub> production during the fuel fabrication process? A German study said emissions were on the order of 34 g CO<sub>2</sub>/kilowatt-hour. (3-6)

**Response:** *The question is noted. Information on CO<sub>2</sub> releases in the fuel fabrication process are available from the U.S. Department of Energy. The comment provides no new information and, therefore, will not be evaluated further.*

**Comment:** What will be the storage system for spent fuel after the current capacity is exceeded, and will it stand up to Category 5 hurricane impacts and terrorist attacks? (3-4)

**Response:** *The question is noted. The impacts associated with waste storage were evaluated in the GEIS and found to be a Category 1 issue. The comment provides no new information and, therefore, will not be evaluated further.*

**Comment:** The commenter is concerned that when Castro steps down, he may be replaced by a less-stable regime, and that Turkey Point may be a target of Cuban foul play. (3-5)

**Response:** *The question is noted. Nuclear plants are not required to have design features for protection against attacks from enemies of the United States (10 CFR 50.13). Therefore, the comment will not be evaluated further.*

**Comment:** What impacts do airborne releases have on human health, especially as these move from soil into food? (3-10)

**Response:** *The comment is noted. Radiation exposure impacts are Category 1 issues and were evaluated in the Section 4.6 of the GEIS. The question provides no new information and, therefore, will not be evaluated further.*

**Comment:** How long before Turkey Point or other plants will require decommissioning and require replacement? (20-1)

**Response:** *The question is noted. Decommissioning was evaluated in the GEIS and found to be a Category 1 issue. The comment provides no new information and, therefore, will not be evaluated further.*

**Comment:** If Turkey Point's license were not renewed, who would maintain the wildlife and protect the endangered species in the area that are vital to the ecosystem? (24-2)

**Response:** *The question is noted. On-site land use is a Category 1 issue and was evaluated in the GEIS. The comment provides no new information and, therefore, will not be evaluated further.*

### **Summary**

The preparation of the plant-specific supplement to the GEIS will take into account all the relevant issues raised during the scoping process that are described above. Concerns related to the environmental license renewal review of Turkey Point will be considered during the development of the draft SEIS for Turkey Point Units 3 and 4. The draft SEIS will be available for public comment. Interested Federal, State, and local government agencies, local organizations, and members of the public will be given the opportunity to provide comments to be considered during the development of the final SEIS. Concerns identified that are outside the scope of the staff's environmental review have been or will be forwarded to the appropriate NRC program manager for consideration.