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10 CFR 51
10 CFR 54

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66 FR 32851
6/18/01
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Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration
Mailstop T-6D 59
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Re: Florida Power & Light Company Comments
Draft Supplemental Environmental Impact Statement for
License Renewal of Nuclear Plants
Supplement 5 Regarding Turkey Point Units 3 and 4
66 Fed. Reg. 32851 (June 18, 2001); 66 Fed. Reg. 35283
(July 3, 2001)

Florida Power & Light Company (FPL), the applicant for the
renewal of operating licenses for Turkey Point Nuclear Plant,
Units 3 and 4, provides the following comments on the referenced
draft supplemental environmental impact statement (DSEIS).

FPL agrees with all of the conclusions and proposed findings in
the DSEIS. FPL offers the following comments largely as
clarifications. FPL urges the Commission to issue a final EIS
addressing the environmental impacts of the proposed renewal of
the Turkey Point operating licenses as soon as possible.

Should you have any questions concerning FPL's comments, please
contact E. A. Thompson at (305) 246-6921.

We appreciate the opportunity to comment on the DSEIS.

Sincerely yours,

T. O. Jones
Acting Vice President - Turkey Point

TOJ/EAT/hlo
Attachment

Template = ADM-013

E-REDS = ADM-03
Add = J.H. Wilson (5 HW)

cc: U.S. Nuclear Regulatory Commission, Washington, D.C.

Chief, License Renewal and Standardization Branch
Project Manager - Turkey Point License Renewal
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Regional Administrator, Region II, USNRC
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ATTACHMENT 1
COMMENTS ON DRAFT GENERIC ENVIRONMENTAL IMPACT
STATEMENT (NUREG 1437 SUPPLEMENT 5)
TURKEY POINT UNITS 3 AND 4
LICENSE RENEWAL APPLICATION

PAGE	LINE NUMBER	COMMENT
1-5	26-27	Should read “contain an analysis of any Category 1 issues unless there is new and significant information on a specific issue – this is pursuant to 10 CFR 51.53 (c) (3) (iii) and (iv).”
1-8	4	The number 13,000 homes is incorrect. The correct number is “over 250,000 homes.”
2-4	17-18	The stacks related to Turkey Point Units 1 and 2 and their environmental impacts are not within the scope of this major federal action and this discussion should be omitted from the DSEIS.
2-5	17	Delete the words “equilibrium core” and “rate”. This clarifies the sentence.
2-7	15	Revise sentence to read, “FPL does not use biocontrol chemicals in the circulating water system.”
2-7	23	The canal system is bordered by the Everglades Mitigation Bank not the Everglades. Directional descriptions toward or away from the Everglades are accurate. Revise the wording accordingly.
2-13, 4-24	15, 38	Change “an additional” to “Up to an additional ...”.
2-20	1	It is unclear what boilers are being referred to. The nuclear plant does not have boilers.
2-21	8	Replace “Within southern Biscayne Bay, Card Sound, and the Turkey Point cooling canal system are...” with “Within the vicinity of Turkey Point are...” As written, the sentence implies that there are 11 protected species within the cooling canal system, an implication that is incorrect and inconsistent with the rest of the paragraph.
2-37	Table 2-8	Because Turkey Point is located in a high population area that has no growth control measures (Page 4-21, beginning on line 14), the Table 2.8 housing information is immaterial and should be deleted.
2-39	1	Education information is pertinent only if an applicant plans refurbishment. Because FPL plans no refurbishment (Chapter 3), the education information should be deleted.

PAGE	LINE NUMBER	COMMENT
2-41	Table 2-11	Because FPL plans no refurbishment (Chapter 3) and Turkey Point tax payments are small relative to the taxing jurisdiction's tax base (Section 4.4.3, beginning at line 30), the Table 2-11 land use information is immaterial and should be deleted.
2-43	2-3	It should be noted that the stacks related to Turkey Point Units 1 and 2 and their environmental impacts are not within the scope of this major federal action.
2-45	Table 2-13	The age distribution information is immaterial and should be deleted.
2-45	13	The transient population information is immaterial and should be deleted.
2-47	Section 2.2.8.6	The low-income information (page 2-48, lines 18 – 26) is demographic information that is pertinent only to the Section 4.4.6 environmental justice analysis and could be moved to that section. With the exception of the tax information (on page 2-50), the economic information is not relevant and should be deleted.
2-50	1-7	FPL is described here as a "major" property taxpayer, while Section 4.4.3 states that FPL pays two percent of the Miami-Dade property taxes. This discussion should be revised to factually state that FPL pays two percent of Miami-Dade property taxes without characterizing the nature of the tax payments.
4-7	36	For the reasons stated in FPL's Environmental Report submitted with its application for renewed licenses, FPL disagrees with NRC's conclusion that all Category 2 issues pertaining to plants with cooling ponds are applicable to Turkey Point Units 3 and 4.
4-22	24	Change the wording to read, "FPL assumed an increase of 60 employees during the license renewal period."
4-22	25	Change 185 to 184. The environmental report states that there will be 184 new jobs.

PAGE	LINE NUMBER	COMMENT
4-25	35	As the environmental report indicates, the Turkey Point site was subject to daily tidal incursions before plant construction. DSEIS Section 2.2.9.1 indicates that the area has been subjected to a rising water table and had at one point been characterized as being too swampy to survey. Section 2.2.9.2 indicates that a cultural resources survey was conducted on land adjacent to the Turkey Point site, with no cultural resources identified. All these observations make it reasonable to conclude that cultural resources are unlikely to be found at the Turkey Point site. Therefore, it is unclear why the Turkey Point DSEIS contains the wording, "However, additional care should be taken ... to ensure that historic properties are not inadvertently impacted." There does not appear to be a reasonable basis for including the cautionary wording in the Turkey Point DSEIS and it should be deleted.
4-33	29	Revise the bullet to read, "Continue to deny public access to the canals." Other bullets should also be stated in terms of continuing action.
4-36	3	The word "states" should be "asserts."
4-36	6	The words "referred to" should be "alleges."
4-36	8	The word "stated" should be "asserts."
4-37	31, 32	"FPL 2000c" is an incorrect reference for the REMP Report.
4-40	6	Insert the following: "The Florida Department of Health's Bureau of Environmental Epidemiology has also reviewed the allegations of Gould, et al. (DOH 2001). The Department used the data cited by Gould, et al. to reconstruct calculations and was not able to identify unusually high rates of cancers in counties nearby nuclear power facilities. The Department concluded that, "Careful analysis and observation of the data presented here does not support the alarming claims made by the RPHP [Radiation and Public Health Project] regarding cancer mortality rates and trends in southeastern Florida counties when compared with the rest of the state of Florida and the nation."
4-42	32-41	The GDC are not applicable to Turkey Point as stated. The Criterion 2 reference is correct as it is referenced in the SAR. The SRP is not applicable to Turkey Point which was licensed before issuance of the SRP in 1987.

PAGE	LINE NUMBER	COMMENT
5-2	21	Delete “and Section 5.1 of this SEIS” and add at the end of the sentence “ and briefly discussed in Section 5.1 of this SEIS.”
5-3	29	Insert after the word “events”, “including for example hurricanes and flooding”.
5-6	28	Change “core melt accidents” to “postulated core melt scenarios”.
5-10	8-15	Modify the wording to read as follows; “The FPL approach in doubling of core damage frequency to account for the calculated benefits for external events provides a numerically reasonable estimate of the potential impact of external events. The staff believes the search for external event vulnerabilities as a part of the Turkey Point IPEEE, did not identify any risk contributors that would benefit from potential SAMAs and considers the FPL approach to be adequate.”
5-14	12-18	Strike the sentences beginning with “The preliminary review” on line 12 and ending with “modeled in the current PSA” on line 18.
5-16	Table 5.5	Three SAMAs (50, 54, 116) listed in the ER are not listed in Table 5.5.
5-19	Sec 5.2.5 second line	Change sentence to read, “The cost estimates conservatively excluded the cost...”.
5-19	2 nd paragraph 5 th line	Delete “FPL responded... attributes” and insert the following at the beginning of the sentence: “In its original submittal, supplemented with responses to NRC Staff’s requests for additional information, FPL provided a summary of the key risk-reduction attributes...”.
5-23	1 st paragraph under Sec 5.2.6.2 2 nd line	Strike the words “Although there could have been more attention given to evaluating actual costs,”.
8-24	6	Insert the word “partially” between the words “pipeline through”.
8-24	29	Replace the word “approximately” with “more than...”. North of Lake Okeechobee to Turkey Point would be between 100 and 200 miles.
8-60, 8-61 See also Table 8-9	29, 3 respectively	The 186 MW(e) shortfall (1386-1200) would have to be made up by MW and not MW-hrs. Running Turkey Point 1 & 2 at a higher capacity factor will not affect peak megawatt output.
8-61	7	Insert the word “direct” between “few” and “environmental.”