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

**RE: EPA Review and Comments on
Draft Generic Environmental Impact Statement for
License Renewal of Nuclear Plants, Supplement 5
Regarding Turkey Point Units 3 and 4, (DGSEIS)
CEQ No. 010220**

Dear Chief:

The U.S. Environmental Protection Agency (EPA) reviewed the document entitled "Draft Generic Environmental Impact Statement for License Renewal of Nuclear Plants Regarding Turkey Point, Supplement 5, Units 3 and 4," (DGSEIS), pursuant to Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. The purpose of this letter is to provide EPA's comments regarding the DGSEIS.

Turkey Point is a nuclear powered, electric generating facility that has process water discharges regulated by the National Pollutant Discharge Elimination System (NPDES) program. Based upon the information provided in the DGSEIS, the document received an "EC-2" rating. That is, there are environmental concerns on some aspects of the proposed project, and more information is needed. Specifically, clarification is needed regarding environmental impacts of the existing recirculating cooling canal system. More detail is also needed regarding the facility's compliance with 40 CFR Part 112, regarding storage of petroleum products. The attached comments detail our concerns.

Template = ADM-013

E-RIDS = ADM-03

Att = J. H. Wilson (JHWI)

Thank you for the opportunity to comment on this DGSEIS. We look forward to reviewing the final document. If you have any questions or require more information, please contact Ramona McConney of my staff at (404) 562-9615.

Sincerely,

A handwritten signature in black ink, appearing to read "Heinz J. Mueller", with a stylized flourish at the end.

Heinz J. Mueller, Chief
Office of Environmental Assessment

**EPA Review and Comments on
Draft Generic Environmental Impact Statement
License Renewal of Nuclear Plants, Supplement 5
Regarding Turkey Point Units 3 and 4 (DGSEIS)**

Alternatives:

As described in the DGSEIS, the environmental impacts of continuing or renewing the license for Turkey Point Units 3 and 4 has fewer environmental impacts than the alternatives. The alternatives described in the document include using fossil fuel power generation processes, constructing a new nuclear facility, or implementing the No-Action Alternative.

Transmission Lines:

Page 4-11; Section 4.2 Transmission Lines: *“Herbicides are used occasionally, primarily applied to individual trees or shrubs to prevent re-sprouting, although broadcast applications are used as general weed control in some of the urban and suburban areas”*. The GSEIS should specify the types and quantities of herbicides applied, and the alternatives to spraying plants with defoliants.

Similarly, the FGSEIS should include details regarding broadcast applications for weed control (types, frequency, quantities, alternatives to chemical applications, etc.). Improperly applied herbicides and weed killers can impact surface and groundwater resources. Poorly timed applications of herbicides in and around residential areas could impact sensitive populations. In addition, some herbicides can also cause potential adverse impacts to wildlife if not used in a conservative manner.

Environmental Justice:

Section 4.4.6: We appreciate the discussion of EJ issues, and the presentation and interpretation of census block data in the DGSEIS.

Appendix A, Comments received on the environmental review:

Page A-18; The GSEIS should provide more detailed responses to specific comments, including Endangered Species. The document defers detailed information to the GEIS, and yet consultation activities with the U.S. Fish and Wildlife Service should have been initiated with the preparation of this DGSEIS.

Page A-25; Water quality impacts to Biscayne Bay from barge deliveries are deferred to the GEIS. This DGSEIS could provide more information in regards to legitimate concerns.

Page A-28; Requirements for the NPDES permit should be known, and the Final GSEIS should provide more detail in response to these comments. Furthermore, the NRC's response to the comment on NPDES requirements is not specific (*“....and are not under the jurisdiction of the NRC”*). Known permit requirements should be addressed in the FGSEIS.

FPL's Compliance Status and Consultation correspondence:

Appendix E; Table E-1: While the table is apparently intended to be comprehensive, it does not include EPA's plan review and approval requirements for storage of petroleum products under the Oil Pollution Prevention Program's Spill Prevention Control and Countermeasures (SPCC), at 40 CFR Part 112. This program is not delegated to the FDEP, and the applicant (Florida Power and Light) has had numerous inspections of its facilities by EPA for compliance with this EPA

program.

The table should be amended to include this approval requirement, as well as any regulatory authority the U.S. Coast Guard has via The Oil Pollution Act of 1990, Facility Response Plan (FRP) requirements for oil storage facilities. A release or discharge from these facilities could potentially present a significant or substantial harm to the environment.

Water Resources:

The National Park Service (Appendix E; pages E-6 to E-11) states that the miles of cooling canals from Turkey Point have altered the natural environment by maintaining a hypersaline area which impedes natural groundwater flow from the upland side of the canals into Biscayne Bay. The NPS also states that the landscape has been altered at the downstream side of these canals by dwarf mangroves and high salinity marshes, as a result of the lack of freshwater flow (which occurred until the creation of the cooling canals; page E-10). The Biscayne National Park requested that the NRC investigate ways to mitigate these impacts.

Appendix A, page A-6, provides an answer to this comment, but does not clarify whether, or how, the construction of the cooling canals may have resulted in impacts to the landscape and the salt marshes in question. However, in the text of the DGSEIS (page 4-7), in the section discussing cooling pond impacts on terrestrial resources, impacts are characterized as "small significance." Clarification is needed regarding direct and indirect impacts from the construction and operation of the cooling canals.

Finally, Page A-6 does not address the request from the NPS regarding consideration of mitigation measures. The Final GSEIS, which should provide more information regarding impacts of the cooling canals, should also include information regarding potential mitigation measures, if impacts have occurred.