

9.0 Summary and Conclusions

1 By letter dated May 29, 2001, the Virginia Electric and Power Company (VEPCo) submitted an
2 application to the U.S. Nuclear Regulatory Commission (NRC) to renew the operating licenses
3 (OLs) for North Anna Power Station, Units 1 and 2, for an additional 20-year period (VEPCo
4 2001). If the OLs are renewed, State regulatory agencies and VEPCo will ultimately decide
5 whether the plants will continue to operate based on factors such as the need for power or
6 other matters within the State's jurisdiction or the purview of the owners. If the OLs are not
7 renewed, then the plants must be shut down at or before the expiration date of the current OLs,
8 which is April 1, 2018, for Unit 1 and August 21, 2020, for Unit 2.

9
10 Section 102 of the National Environmental Policy Act (NEPA) (42 USC 4321), directs that an
11 environmental impact statement (EIS) is required for major Federal actions that significantly
12 affect the quality of the human environment. The NRC has implemented Section 102 of NEPA
13 in 10 CFR Part 51. Part 51 identifies licensing and regulatory actions that require an EIS. In
14 10 CFR 51.20(b)(2), the Commission requires preparation of an EIS or a supplement to an EIS
15 for renewal of a reactor OL; 10 CFR 51.95(c) states that the EIS prepared at the OL renewal
16 stage will be a supplement to the *Generic Environmental Impact Statement for License
17 Renewal of Nuclear Plants* (GEIS), NUREG-1437, Volumes 1 and 2 (NRC 1996; 1999).^(a)

18
19 Upon acceptance of the VEPCo application, the NRC began the environmental review process
20 described in 10 CFR Part 51 by publishing a notice of intent to prepare an EIS and conduct
21 scoping (66 FR 46294 [NRC 2001]) for North Anna on September 4, 2001. The staff visited
22 North Anna in October 2001 and held public scoping meetings on October 18, 2001, in Louisa
23 County, Virginia. The staff reviewed the VEPCo Environmental Report (ER) (VEPCo 2001) and
24 compared it to the GEIS, consulted with other agencies, and conducted an independent review
25 of the issues following the guidance set forth in NUREG-1555, Supplement 1, the *Standard
26 Review Plans for Environmental Reviews for Nuclear Power Plants, Supplement 1: Operating
27 License Renewal* (NRC 2000). The staff also considered the public comments received during
28 the scoping process for preparation of this draft Supplemental Environmental Impact Statement
29 (SEIS) for North Anna Power Station, Units 1 and 2. The public comments received during the
30 scoping process that were considered to be within the scope of the environmental review are
31 provided in Appendix A, Part 1, of this SEIS.

32
33 The staff will hold two public meetings near North Anna Power Station in June 2002 to describe
34 the preliminary results of the NRC environmental review and to answer questions to provide
35 members of the public with information to assist them in formulating their comments. When the
36 comment period ends, the staff will consider and disposition all of the comments received.

(a) The GEIS was originally issued in 1996. Addendum 1 to the GEIS was issued in 1999. Hereafter,
all references to the "GEIS" include the GEIS and its Addendum 1.

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1 These comments will be addressed in Appendix A, Part 2, of the final SEIS. Additional details
2 concerning the meetings will be provided in a future meeting notice and in the Notice of
3 Availability concerning this SEIS in the *Federal Register*.

4
5 This draft SEIS includes the NRC staff's preliminary analysis that considers and weighs the
6 environmental effects of the proposed action, the environmental impacts of alternatives to the
7 proposed action, and mitigation measures available for reducing or avoiding adverse effects. It
8 also includes the staff's preliminary recommendation regarding the proposed action.

9
10 The NRC has adopted the following statement of purpose and need for license renewal from
11 the GEIS:

12
13 The purpose and need for the proposed action (renewal of an operating license) is to
14 provide an option that allows for power generation capability beyond the term of a
15 current nuclear power plant operating license to meet future system generating needs,
16 as such needs may be determined by State, utility, and, where authorized, Federal
17 (other than NRC) decisionmakers.

18
19 The goal of the staff's environmental review, as defined in 10 CFR 51.95(c)(4) and the GEIS, is
20 to determine

21
22 ...whether or not the adverse environmental impacts of license renewal are so great that
23 preserving the option of license renewal for energy planning decisionmakers would be
24 unreasonable.

25
26 Both the statement of purpose and need and the evaluation criterion implicitly acknowledge
27 that, even if an OL is renewed, there are other factors that will ultimately determine whether an
28 existing nuclear power plant continues to operate beyond the period of the current OL.

29
30 NRC regulations [10 CFR 51.95(c)(2)] contain the following statement regarding the content of
31 SEISs prepared at the license renewal stage:

32
33 The supplemental environmental impact statement for license renewal is not required to
34 include discussion of need for power or the economic costs and economic benefits of
35 the proposed action or of alternatives to the proposed action except insofar as such
36 benefits and costs are either essential for a determination regarding the inclusion of an
37 alternative in the range of alternatives considered or relevant to mitigation. In addition,
38 the supplemental environmental impact statement prepared at the license renewal stage
39 need not discuss other issues not related to the environmental effects of the proposed

1 action and the alternatives, or any aspect of the storage of spent fuel for the facility
2 within the scope of the generic determination in § 51.23(a) and in accordance with
3 § 51.23(b).^(a)
4

5 The GEIS contains the results of a systematic evaluation of the consequences of renewing an
6 OL and operating a nuclear power plant for an additional 20 years. It evaluates 92 environmen-
7 tal issues using the NRC's three-level standard of significance—SMALL, MODERATE, or
8 LARGE—developed using the Council on Environmental Quality guidelines. The following
9 definitions of the three significance levels are set forth in a footnote to Table B-1 of 10 CFR
10 Part 51, Subpart A, Appendix B:
11

12 SMALL - Environmental effects are not detectable or are so minor that they will neither
13 destabilize nor noticeably alter any important attribute of the resource.
14

15 MODERATE - Environmental effects are sufficient to alter noticeably, but not to destabilize,
16 important attributes of the resource.
17

18 LARGE - Environmental effects are clearly noticeable and are sufficient to destabilize
19 important attributes of the resource.
20

21 For 69 of the 92 issues considered in the GEIS, the analysis in the GEIS shows the following:
22

- 23 (1) The environmental impacts associated with the issue have been determined to apply either
24 to all plants or, for some issues, to plants having a specific type of cooling system or other
25 specified plant or site characteristic.
26
- 27 (2) A single significance level (i.e., SMALL, MODERATE, or LARGE) has been assigned to the
28 impacts (except for collective offsite radiological impacts from the fuel cycle and from high
29 level waste [HLW] and spent fuel disposal).
30
- 31 (3) Mitigation of adverse impacts associated with the issue has been considered in the analysis,
32 and it has been determined that additional plant-specific mitigation measures are likely not
33 to be sufficiently beneficial to warrant implementation.
34

35 These 69 issues were identified in the GEIS as Category 1 issues. In the absence of new and
36 significant information, the staff relied on conclusions as amplified by supporting information in

(a) The title of 10 CFR 51.23 is "Temporary storage of spent fuel after cessation of reactor operations-
generic determination of no significant environmental impact."

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1 the GEIS for issues designated Category 1 in Table B-1 of 10 CFR Part 51, Subpart A,
2 Appendix B.

3
4 Of the 23 issues that do not meet the criteria set forth above, 21 are classified as Category 2
5 issues requiring analysis in a plant-specific supplement to the GEIS. The remaining two issues,
6 environmental justice and chronic effects of electromagnetic fields, were not categorized.
7 Environmental justice was not evaluated on a generic basis and must also be addressed in a
8 plant-specific supplement to the GEIS. Information on the chronic effects of electromagnetic
9 fields was not conclusive at the time the GEIS was prepared.

10
11 This draft SEIS documents the staff's evaluation of all 92 environmental issues considered in
12 the GEIS. The staff considered the environmental impacts associated with alternatives to
13 license renewal and compared the environmental impacts of license renewal and the
14 alternatives. The alternatives to license renewal that were considered include the no-action
15 alternative (not renewing the OLs for North Anna Power Station, Units 1 and 2) and alternative
16 methods of power generation. These alternatives were evaluated assuming that the
17 replacement power generation plant is located at either the North Anna site or some other
18 unspecified location.

20 **9.1 Environmental Impacts of the Proposed Action —** 21 **License Renewal**

22
23 VEPCo and the staff have established independent processes for identifying and evaluating the
24 significance of any new information on the environmental impacts of license renewal. Neither
25 VEPCo nor the staff has identified information that is both new and significant related to
26 Category 1 issues that would call into question the conclusions in the GEIS. Similarly, neither
27 the scoping process, VEPCo, nor the staff has identified any new issue applicable to North
28 Anna Power Station, Units 1 and 2, that has a significant environmental impact. Therefore, the
29 staff relies upon the conclusions of the GEIS for all Category 1 issues that are applicable to
30 North Anna Power Station, Units 1 and 2.

31
32 VEPCo's license renewal application presents an analysis of the Category 2 issues that are
33 applicable to North Anna Power Station, Units 1 and 2. In addition, the staff has evaluated the
34 two uncategorized issues, environmental justice and chronic effects from electromagnetic
35 fields. The staff has reviewed the VEPCo analysis for each issue and has conducted an
36 independent review of each issue. Five Category 2 issues are not applicable because they are
37 related to plant design features or site characteristics not found at North Anna. Four Category
38 2 issues are not discussed in this draft SEIS because they are specifically related to
39 refurbishment. VEPCo (VEPCo 2001) has stated that its evaluation of structures and

1 components, as required by 10 CFR 54.21, did not identify any major plant refurbishment
2 activities or modifications as necessary to support the continued operation of North Anna Power
3 Station, Units 1 and 2, for the license renewal period. In addition, any replacement of
4 components or additional inspection activities are within the bounds of normal plant component
5 replacement and, therefore, are not expected to affect the environment outside of the bounds of
6 the plant operations evaluated in the *Final Environmental Statement Related to the*
7 *Continuation of Construction and the Operation of North Anna Unit 1 and 2 and the*
8 *Construction of Units 3 and 4*, issued in 1973, and the two addenda to the final environmental
9 statements related to the operation of North Anna Power Station, Units 1 and 2, issued by the
10 NRC in 1976 and 1980.

11
12 Twelve Category 2 issues related to operational impacts and postulated accidents during the
13 renewal term, as well as environmental justice and chronic effects of electromagnetic fields, are
14 discussed in detail in this draft SEIS. Five of the Category 2 issues and environmental justice
15 apply to both refurbishment and to operation during the renewal term and are discussed in this
16 draft SEIS only in relation to operation during the renewal term. For all 12 Category 2 issues
17 and environmental justice, the staff concludes that the potential environmental effects are of
18 SMALL significance in the context of the standards set forth in the GEIS. In addition, the staff
19 determined that appropriate Federal health agencies have not reached a consensus on the
20 existence of chronic adverse effects from electromagnetic fields. Therefore, no further
21 evaluation of this issue is required. For severe accident mitigation alternatives (SAMAs), the
22 staff concludes that a reasonable, comprehensive effort was made to identify and evaluate
23 SAMAs. Based on its review of the SAMAs for North Anna Power Station, Units 1 and 2, and
24 the plant improvements already made, the staff concludes that none of the candidate SAMAs
25 are cost-beneficial.

26
27 Mitigation measures were considered for each Category 2 issue. Current measures to mitigate
28 the environmental impacts of plant operation were found to be adequate, and no additional
29 mitigation measures were deemed sufficiently beneficial to be warranted.

30
31 The following sections discuss unavoidable adverse impacts, irreversible or irretrievable
32 commitments of resources, and the relationship between local short-term use of the
33 environment and long-term productivity.

34 35 **9.1.1 Unavoidable Adverse Impacts**

36
37 An environmental review conducted at the license renewal stage differs from the review
38 conducted in support of a construction permit because the plant is in existence at the license
39 renewal stage and has operated for a number of years. As a result, adverse impacts
40 associated with the initial construction have been avoided, have been mitigated, or have

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1 already occurred. The environmental impacts to be evaluated for license renewal are those
2 associated with refurbishment and continued operation during the renewal term.

3
4 The adverse impacts of continued operation identified are considered to be of SMALL signifi-
5 cance, and none warrants implementation of additional mitigation measures. The adverse
6 impacts of likely alternatives if North Anna Power Station, Units 1 and 2, cease operation at or
7 before the expiration of the current OLS will not be smaller than those associated with continued
8 operation of these units, and they may be greater for some impact categories in some
9 locations.

10 11 **9.1.2 Irreversible or Irrecoverable Resource Commitments**

12
13 The commitment of resources related to construction and operation of North Anna Power
14 Station, Units 1 and 2, during its current license period was made when the plant was built. The
15 resource commitments to be considered in this draft SEIS are associated with continued
16 operation of the plant for an additional 20 years. These resources include materials and
17 equipment required for plant maintenance and operation, the nuclear fuel used by the reactors,
18 and ultimately, permanent offsite storage space for the spent fuel assemblies.

19
20 The most significant resource commitments related to operation during the renewal term are
21 the fuel and the permanent storage space. North Anna Power Station, Units 1 and 2, replace
22 approximately one-third of the fuel assemblies in each of the two units during every refueling
23 outage, which occurs on an 18-month cycle.

24
25 If North Anna Power Station, Units 1 and 2, cease operation on or before the expiration of the
26 current OLS, the likely power generation alternatives will require a commitment of resources for
27 construction of the replacement plants as well as for fuel to run the plants.

28 29 **9.1.3 Short-Term Use Versus Long-Term Productivity**

30
31 An initial balance between short-term use and long-term productivity of the environment at the
32 North Anna Power Station site was set when the plants were approved and construction began.
33 That balance is now well established. Renewal of the OLS for North Anna Power Station,
34 Units 1 and 2, and continued operation of the plants will not alter the existing balance, but may
35 postpone the availability of the site for other uses. Denial of the application to renew the OLS
36 will lead to shutdown of the plants and will alter the balance in a manner that depends on
37 subsequent uses of the site. For example, the environmental consequences of turning the
38 North Anna Power Station site into a park or an industrial facility are quite different.

9.2 Relative Significance of the Environmental Impacts of License Renewal and Alternatives

The proposed action is renewal of the OLs for North Anna Power Station, Units 1 and 2. Chapter 2 describes the site, power plants, and interactions of the plants with the environment. As noted in Chapter 3, no refurbishment and no refurbishment impacts are expected at North Anna Power Station, Units 1 and 2. Chapters 4 through 7 discuss environmental issues associated with renewal of the OLs. Environmental issues associated with the no-action alternative and alternatives involving power generation and use reduction are discussed in Chapter 8.

The significance of the environmental impacts from the proposed action (approval of the application for renewal of the OLs), the no-action alternative (denial of the application), alternatives involving nuclear, coal, or gas generation of power at North Anna Power Station, Units 1 and 2, an unspecified "greenfield site," and a combination of alternatives are compared in Table 9-1.

Table 9-1 shows that the significance of the environmental effects of the proposed action are SMALL for all impact categories (except for collective offsite radiological impacts from the fuel cycle and from HLW and spent fuel disposal, for which a single significance level was not assigned [see Chapter 6]). The alternative actions, including the no-action alternative, may have environmental effects in at least some impact categories that reach MODERATE or LARGE significance.

9.3 Staff Conclusions and Recommendations

Based on (1) the analysis and findings in the GEIS (NRC 1996; 1999), (2) the ER submitted by VEPCo (VEPCo 2001), (3) consultation with Federal, State, and local agencies, (4) the staff's own independent review, and (5) the staff's consideration of public comments received during the scoping process, the preliminary recommendation of the staff is that the Commission determine that the adverse environmental impacts of license renewal for North Anna Power Station, Units 1 and 2, are not so great that preserving the option of license renewal for energy planning decisionmakers would be unreasonable.

Table 9-1. Summary of Environmental Significance of License Renewal, the No-Action Alternative, and Alternative Methods of Generation

Impact Category	Proposed Action	No-Action Alternative	Coal-Fired Generation		Natural Gas-Fired Generation		New Nuclear Generation		Combination of Alternatives	
	License Renewal	Denial of Renewal	North Anna Site	Alternate Greenfield Site	North Anna Site	Alternate Greenfield Site	North Anna Site	Alternate Greenfield Site	North Anna Site	Alternate Greenfield Site
Land Use	SMALL	SMALL	SMALL to MODERATE	SMALL to LARGE	SMALL to MODERATE	SMALL to LARGE	MODERATE	MODERATE to LARGE	SMALL to MODERATE	SMALL to LARGE
Ecology	SMALL	SMALL	SMALL to MODERATE	SMALL to LARGE	SMALL to MODERATE	SMALL to LARGE	MODERATE	MODERATE to LARGE	SMALL to MODERATE	SMALL to LARGE
Water Use and Quality	SMALL	SMALL	SMALL	SMALL to MODERATE	SMALL	SMALL to MODERATE	SMALL	SMALL to MODERATE	SMALL	SMALL to MODERATE
Air Quality	SMALL	SMALL	MODERATE	MODERATE	SMALL to MODERATE	SMALL to MODERATE	SMALL	SMALL	SMALL to MODERATE	SMALL to MODERATE
Waste	SMALL	SMALL	MODERATE	MODERATE	SMALL	SMALL	SMALL	SMALL	SMALL	SMALL
Human Health	SMALL	SMALL	SMALL	SMALL	SMALL	SMALL	SMALL	SMALL	SMALL	SMALL
Socioeconomics	SMALL	SMALL to MODERATE	SMALL to MODERATE	SMALL to LARGE	SMALL to MODERATE	SMALL to LARGE	SMALL to MODERATE	SMALL to LARGE	SMALL to MODERATE	SMALL to LARGE
Transportation	SMALL	SMALL	SMALL to LARGE	SMALL to LARGE	SMALL to MODERATE	SMALL to LARGE	SMALL to LARGE	SMALL to LARGE	SMALL to MODERATE	SMALL to LARGE
Aesthetics	SMALL	SMALL	SMALL to MODERATE	SMALL to LARGE	SMALL	SMALL to LARGE	SMALL	SMALL to LARGE	SMALL	SMALL to LARGE
Historic and Archaeological Resources	SMALL	SMALL to MODERATE	SMALL	SMALL	SMALL	SMALL	SMALL	SMALL	SMALL	SMALL
Environmental Justice	SMALL	SMALL to MODERATE	SMALL to MODERATE	SMALL to LARGE	SMALL to MODERATE	SMALL to LARGE	SMALL	SMALL to LARGE	SMALL to MODERATE	SMALL to LARGE

(a) Except for collective offsite radiological impacts from the fuel cycle and from HLW and spent-fuel disposal, for which a significance level was not assigned. See Chapter 6 for details.

April 2002

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9.4 References

10 CFR Part 51. Code of Federal Regulations, *Title 10, Energy*, Part 51, “Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions.”

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