

Comments by Jud White, Dominion
NRC Public Comment Meeting – May 29, 2002
Draft Supplemental Environmental Impact Statement (SEIS)
Surry Power Station

- My name is Jud White and I'm an environmental manager for Dominion with responsibilities related to water and waste compliance activities at all of our generating facilities, including Surry Power Station. I have about 27 years experience with Dominion; my academic degrees include a Masters in Biology and a Ph.D. in Environmental Policy. I am very proud of Dominion's environmental performance throughout the years I've been employed.
- I was directly involved with the Dominion nuclear team that prepared the license renewal application for Surry Power Station and, in particular, I helped develop our environmental report to the NRC and coordinated with federal and state environmental agencies.
- Dominion commends the NRC in developing a high-quality and professional draft Supplemental Environmental Impact Statement associated with license renewal for Surry Power Station. The Supplemental Environmental Impact Statement is a thorough and accurate scientific assessment of the potential environmental impacts associated with the proposed action.
- Dominion supports and agrees with the conclusion of NRC staff that renewing the Surry Power Station operating license is a reasonable option that will not result in any noticeable impact to the environment. The draft Supplemental Environmental Impact Statement states, "the adverse environmental impacts of license renewal for Surry Power Station, Units 1 and 2, are not so great that preserving the option of license renewal for energy-planning decisionmakers would be unreasonable." Basically this means that for Dominion the license renewal option is preserved or acceptable for Surry Power Station in order to meet future system generating needs of the company.

- The environmental impacts associated with potential alternative sources of electricity, in lieu of license renewal, are considered greater than preserving the option of license renewal for Surry Power Station. This is an important finding in the draft Supplemental Environmental Impact Statement.
- Dominion prepared (over a several year period) and submitted an extensive Environmental Report to NRC for license renewal that was part of the information used by NRC to develop this Supplemental Environmental Impact Statement and its recommendation. In other words, the NRC didn't just rely on our work. They independently validated our conclusions through the use of additional resources, including; their Generic Environmental Impact Statement for License Renewal for Nuclear Plants, extensive consultation with federal, state, and local environmental agencies, independent review by NRC staff and national laboratory consultants, and the consideration of public comment during the scoping process last September.
- Of particular note relative to information sources, Dominion proactively engaged in discussions and meetings with key state and federal environmental agency staffs very early in the license renewal process to help ensure all issues were identified and appropriately addressed in the Environmental Report submitted to the NRC. Dominion also proactively communicated with environmental and other pertinent stakeholders about license renewal. This helped considerably in the development of a thorough and accurate report.
- Potential environmental impacts to fish, shellfish, aquatic macroinvertebrates and threatened and endangered species are discussed in detail in the report. In fact extensive studies of the environmental impacts began in 1969, before the station was operational. Based on the station's cooling water intake and discharge design (water intake screening results in high survivability, heated water is dispersed and cools rapidly) and its location in the tidal transition zone (biota more abundant upstream and downstream of the plant site), the NRC concluded that potential impacts to aquatic biota from operation are small and that additional mitigation is not warranted. The NRC has also preliminarily determined that the continued operation of Surry Power Station and its associated transmission lines will not adversely affect any threatened or endangered species, including the bald eagle, which has

thrived in the area for many years. Dominion agrees with these scientific findings of NRC.

- With respect to historic resources, Dominion has coordinated closely with Virginia's Department of Historic Resources during the license renewal process. This department has concluded that "there are no recorded historic districts, structures or archaeological sites located within the ... facility." The staff concluded though that there is a moderate to high potential for undiscovered historical and archaeological resources to be present on the undeveloped portions of the property; but by limiting future access to the property, it was determined that continued operation of the Surry Power Station would have a beneficial, protective effect on undiscovered historical or archaeological resources located in the undisturbed portion of the site, for the duration of the license renewal period.
- To assist NRC in evaluating the current applicability of the Generic Environmental Impact Statement information as it pertained to the generic issues classified as needing no further review, Dominion developed an internal procedure to identify any new and significant information related to these issues that could potentially change the determinations. No information was identified that would change the conclusions in the Generic Environmental Impact Statement. This activity is considered very important in all license renewal projects for verification of the findings in the Generic Environmental Impact Statement.
- Dominion also agrees with the NRC that the potential environmental impacts of license renewal for the remaining environmental issues evaluated separately in the Supplemental Environmental Impact Statement are small. A significant consideration for this determination was the fact that no new major construction or land-disturbing activity is to take place in order to proceed with license renewal, nor are there any new or increased environmental emissions as a result of this action. In essence, current measures to mitigate environmental impacts associated with operations were found to be adequate.
- Dominion takes pride in its environmental performance and its positive relationships with regulatory agencies, environmental organizations, the general public, and our community neighbors. All of this takes time to

foster and develop as well as a major commitment by management to openness and candor. In this license renewal process we want to ensure that we continue on this path and that nothing adversely impacts our future performance or relationships.

- Dominion believes that our obligation to provide safe and reliable energy from nuclear power extends well beyond this license renewal milestone. Federal, state and local oversight will continue to test and challenge, just as it does today, our standard of environmental excellence and the conduct of our daily business.
- Dominion welcomes all comments on the contents of this Supplemental Environmental Impact Statement during the required public comment period and we look forward to working constructively with NRC staff.