

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

July 30, 2002

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Chief  
Rules and Directives Branch  
Mailstop T-6D 59  
United States Nuclear Regulatory Commission  
Washington, DC 20555-0001

Serial No.: 02-320  
LR/LTB R0  
Docket Nos.: 50-338/339  
License Nos.: NPF-4/7

*5/16/02*  
*67F1231960*  
*(2)*

Gentlemen:

**VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)**  
**NORTH ANNA POWER STATION UNITS 1 AND 2**  
**LICENSE RENEWAL APPLICATION**  
**RESPONSE TO REQUEST FOR COMMENT ON THE DRAFT PLANT-SPECIFIC**  
**SUPPLEMENT 7 TO THE GENERIC ENVIRONMENTAL IMPACT STATEMENT**

In a letter dated April 19, 2002, the NRC provided Virginia Electric and Power Company (Dominion) a draft supplement environmental impact statement (SEIS) regarding license renewal of North Anna Power Station, Units 1 and 2. This draft SEIS is the draft plant-specific Supplement 7 to NUREG-1437, Generic Environmental Impact Statement for License Renewal of Nuclear Plants and was provided for review and comment. Attached are our comments on the draft SEIS.

Dominion considers the draft SEIS to be an accurate and factual representation of the environmental conditions associated with plant operation during the license renewal period. Furthermore, we concur with the conclusions of the NRC that any environmental impacts associated with license renewal would be of small significance and that any adverse environmental impacts of license renewal would be smaller than those of other reasonable energy alternatives. Dominion specifically concurs with the NRC's topic discussions and conclusions presented in the draft SEIS.

Should you have any questions regarding this submittal, please contact Mr. J. E. Wroniewicz at (804) 273-2186.

Very truly yours,



Leslie N. Hartz  
Vice President - Nuclear Engineering

Attachment

Commitments made in this letter: None

*Memorandum = ADM-013*

*FRIDS = ADM-03*  
*Add = A. Kugler (AS/K1)*  
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**Attachment**

**License Renewal – Response to Request for Comment  
Draft Plant-Specific Supplement 7 to the GEIS  
Serial No. 02-320**

**North Anna Power Station, Units 1 and 2  
License Renewal Application**

**Virginia Electric and Power Company  
(Dominion)**

**Comment 1:**

**Section 1.5 Compliance and Consultations**

Page 1-9, Line 8:

**Draft GEIS Statement:**

*Table 1-1 indicates that the US Fish & Wildlife Service Migratory Bird Treaty Act Permit expired December 31, 2001.*

**Dominion Comment:**

Depredation Permit Number MB705136-0 was renewed effective 4/22/02, and expires 3/31/03. It is suggested that this update be reflected in Table 1-1.

**Comment 2:**

**Section 2.1.5 Non-radioactive Waste Systems**

Page 2-12, Line 34:

**Draft GEIS Statement:**

*The statement is made that, "An onsite solvent shop recycles paint."*

**Dominion Comment:**

The following correction is suggested as a replacement: "An onsite paint shop recycles solvent."

**Comment 3:**

**Section 2.1.5 Non-radioactive Waste Systems**

Page 2-13, Line 2:

**Draft GEIS Statement:**

*The statement is made that, "Non-radioactive liquid waste produced ... (e.g., water treatment activities, stormwater runoff, housekeeping wastes) are sampled and treated ..."*



**Dominion Comment:**

The statement is not accurate without exception. It is suggested that "housekeeping wastes" be deleted from this statement since there are waste disposal processes in which not all "housekeeping wastes" are sampled.

**Comment 4:**

**Section 2.2.3 Water Quality**

Page 2-17, Line 29:

**Draft GEIS Statement:**

*It is stated that "The US EPA has authorized VDEQ to implement NPDES within the State."*

**Dominion Comment:**

It is suggested that the statement read "The US EPA has **delegated** implementation of NPDES to VDEQ within the **Commonwealth of Virginia**." to reflect the actual federal-to-state relationship.

**Comment 5:**

**Section 2.2.4 Air Quality**

Page 2-18, Line 14:

**Draft GEIS Statement:**

*It is stated "... the annual average wind power rated as 1 on a scale of 1 to 7 (Elliott, et al. 1987).*

**Dominion Comment:**

It is suggested that the following words be inserted "...on a scale of 1 to 7, **with 1 being the lowest** ..." prior to the reference callout.

**Comment 6:**

**Section 2.2.5 Aquatic Resources**

Page 2-22, Lines 21-22, Table 2-2:

**Draft GEIS Statement:**

*The slippershell mussel (Alasmodonta viridis) is given as a Federal-listed species.*

**Dominion Comment:**

Based on a 2002 review of the Virginia Fish & Wildlife Information Service web site for the slippershell mussel, this species only occurs in the extreme western part of the Commonwealth of Virginia. It is not considered to occur in streams in counties adjacent to Lake Anna, immediately upstream or downstream North Anna River, or in counties crossed by North Anna transmission line corridors. Table 2-1 of the License Renewal Application Environmental Report does not list this species as a species of concern, and the description of this species within the SEIS implies it is of potential concern for the area in which North Anna Power Station is located. It is therefore requested that this species be deleted from the SEIS.

**Comment 7:**

**Section 2.2.6 Terrestrial Resources**

Page 2-24, Table 2-3, and Page 2-25, Lines 4-7:

**Draft GEIS Statement:**

*The sensitive joint-vetch is listed in Table 2-3 and discussed on Page 2-25, yet stated "It is not known to occur at North Anna or the transmission line rights-of-way."*

**Dominion Comment:**

Based on a review of the Virginia Fish & Wildlife Information Service web site for the sensitive joint-vetch, this species is only located along tidally-influenced fresh waters. This is not the case for North Anna, near Lake Anna, nor for any transmission line corridors for North Anna Power Station. The description of this species within the SEIS implies it is of potential concern for the area in which North Anna Power Station is located. It is therefore requested that the listing and discussion of this species be deleted from the SEIS.

**Comment 8:**

**Section 2.2.8.1 Housing**

Page 2-28, Line 50:

**Draft GEIS Statement:**

*It is stated that "Louisa County is currently updating its plan (VEPCo 2001b)."*

**Dominion Comment:**

Louisa County approved an updated Louisa County Comprehensive Plan in September 2001, referenced on Page 2-51, Lines 33-34. This statement should be updated accordingly.

**Comment 9:**

**Section 2.2.8.1 Housing**

Page 2-30, Table 2-7:

**Draft GEIS Statement:**

*Table 2-7 is titled "Population Growth ... 1980-2010". Population data includes Richmond City & County.*

**Dominion Comment:**

It is suggested the title read "**Estimated** Population Growth ...". Population data given in Table 2-7 varies from the License Renewal Application Environmental Report due to the inclusion of Richmond City & County. Richmond **County** is not located in the population zone for consideration.

**Comment 10:**

**Section 2.2.8.2 Public Services, Water Supply**

Page 2-30, Lines 21-22:

**Draft GEIS Statement:**

*It is stated that Henrico County provides water to approximately 80,215 customers.*

**Dominion Comment:**

The License Renewal Application Environmental Report stated 74,000 customers, and the Draft SEIS references the ER. We cannot substantiate the source of the SEIS number and suggest that the number be revised to reflect the LRA ER identified number of customers, or the source of the SEIS number specified.

**Comment 11:**

**Section 2.2.8.2 Public Services, Water Supply**

Page 2-30, Line 30:

**Draft GEIS Statement:**

*It is stated that the maximum capacity of the City of Richmond is 128 MGD.*

**Dominion Comment:**

The License Renewal Application Environmental Report stated the maximum capacity at 132 MGD. We cannot substantiate the source of the SEIS number and suggest that the number be revised to reflect the LRA ER number, or the source of the SEIS number specified.

**Comment 12:**

**Section 4.6.1 Aquatic Species**

Page 4-42, Line 23:

**Draft GEIS Statement:**

*It has been determined that impacts "... would be SMALL, ..."*

**Dominion Comment:**

It is requested that the following words be added to the above sentence to be consistent with Endangered Species Act wording and Surry Draft SEIS conclusion statements: "... would be **SMALL and would not be adversely affected**, ...".

**Comment 13:**

**Section 4.7.1 Evaluation of Potential New and Significant Information Received from the FWS Chesapeake Bay Field Office**

Page 4-44, Lines 24-27:

**Draft GEIS Statement:**

*It is written that the NRC staff will inform VEPCo of comments provided by FWS and recommend further dialogue.*

**Dominion Comment:**

It is requested that this statement be changed to reflect recent discussions regarding this issue and the final course of action as determined by the NRC staff. We recommend that the April 30, 2002 correspondence from NRC to FWS be referenced for completeness.

**Comment 14:**

**Section 5.2.6.1 VEPCo Evaluation**

Page 5-22, Line 32:

**Draft GEIS Statement:**

*There is a "?" provided in the APE formula.*

**Dominion Comment:**

The question mark "?" should be a "delta symbol" in the APE formula.

**Comment 15:**

**Section 5.2.6.1 VEPCo Evaluation**

Page 5-23, Line16:

**Draft GEIS Statement:**

*It is written that "This higher value is primarily due to the high frequency of SGTRs ...".*

**Dominion Comment:**

It is requested that the words "frequency of" be replaced with "**contribution to CDF from**".

**Comment 16:**

**Section 8.2.3.1 Once-Through Cooling System**

Page 8-35, Lines 24-35:

**Draft GEIS Comment:**

*It is written that "Approximately 200 ha (500 ac) would be needed for the construction of the new plant."*

**Dominion Comment:**

Since the initial Final Environmental Statement for North Anna Power Station was written for four units, it should be summarized that no additional land may be needed for construction of a new plant.

**Comment 17:**

**Section 9.1.2 Irreversible or Irretrievable Resource Commitments**

Page 9-6, Lines 20-21:

**Draft GEIS Statement:**

*It is written that "The most significant resource commitments related to operation during the renewal term are the fuel and the permanent storage space."*

**Dominion Comment:**

It is our presumption that "permanent storage space" refers to a national repository. In light of recent federal government actions regarding spent fuel disposition, it is requested that this statement be changed to reflect federal direction, and add the word "**offsite**" to the phrase "permanent storage space" to be consistent with the phrase "permanent offsite storage space" in Line 18.