Appendix A

Discussion of Comments Received on the Environmental Review

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Part I - Comments Received During Scoping

On August 15, 2001, the U.S. Nuclear Regulatory Commission (NRC) published a Notice of Intent in the Federal Register (66 FR 42897), to notify the public of the staff's intent to prepare a plant-specific supplement to the *Generic Environmental Impact Statement for License Renewal of Nuclear Plants* (GEIS), NUREG-1437, Volumes 1 and 2, to support the renewal application for the Surry Power Station operating licenses (OLs) and to conduct scoping. The plant-specific supplement to the GEIS has been prepared in accordance with the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) guidelines, and 10 CFR Part 51. As outlined by NEPA, the NRC initiated the scoping process with the issuance of the Federal Register Notice. The NRC invited the applicant; Federal, State, and local government agencies; local organizations; and individuals to participate in the scoping process by providing oral comments at the scheduled public meetings and/or submitting written suggestions and comments no later than October 15, 2001.

The scoping process included two public scoping meetings, which were held at the Surry County Government Center in Surry County, Virginia, on September 19, 2001. Approximately 50 members of the public attended the meetings. Both sessions began with NRC staff members providing a brief overview of the license renewal process and the NEPA process. After the NRC's prepared statements, the meetings were open for public comments. Twenty (20) attendees provided either oral comments or written statements that were recorded and transcribed by a certified court reporter. The meeting transcripts are an attachment to the October 10, 2001, Scoping Meeting Summary.

The NRC received a letter dated November 15, 2001, from Mr. John P. Wolflin of the U.S. Fish and Wildlife Service (FWS) providing comments on the scope of the staff's environmental review. Because these comments arrived well after the scoping process had ended, they were not included in the scoping summary report. However, the staff did consider the comments from FWS in the preparation of this supplemental environmental impact statement (SEIS).

At the conclusion of the scoping period, the NRC staff and its contractors reviewed the transcripts to identify specific comments and issues. Each set of comments from an individual was given a unique identifier (Commenter ID), so that the comments could be traced back to the original transcript containing the comment. Specific comments were numbered sequentially within each comment set. Several commenters submitted more than one set of comments (e.g., they made statements in both the afternoon and evening scoping meetings). In these cases, there is a unique Commenter ID for each set of comments.

Table A-1 identifies the individuals who provided comments applicable to the environmental review and gives the Commenter ID associated with each set of comments. Individuals who spoke at the scoping meetings are listed in the order in which they spoke at the public meeting. To maintain consistency with the scoping summary report (Surry Power Station Scoping Summary Report, dated January 16, 2002), the unique identifier used in that report for each set of comments is retained in this report.

Table A-1. Individuals Providing Comments During Scoping Comment Period

Commenters ID	Commenter	Affiliation (If Stated)	Comment Source
SurS-A	Bill Barlow	Virginia House of Delegates	Scoping Meeting
SurS-B	Henry Bradby	The Isle of Wight County Board of Supervisors	Scoping Meeting
SurS-C	Judy Lyttle	Surry County Board of Supervisors	Scoping Meeting
SurS-D	Doug Caskey	Isle of Wight County	Scoping Meeting
SurS-E	Tyrone Franklin	Surry County Government	Scoping Meeting
SurS-F	Constance Rhodes	Smithfield Isle of Wight	Scoping Meeting
SurS-G	Claude Reeson	Surry County Chamber of Commerce	Scoping Meeting
SurS-H	Wilton Bobo	Dominion	Scoping Meeting
SurS-I	Richard Blount	Dominion	Scoping Meeting
SurS-J	Bill Bolin	Dominion	Scoping Meeting
SurS-K	Mike Stevens		Scoping Meeting
SurS-L	Howard Daniels	Tri-County Interdenominational Ministers Conference	Scoping Meeting
SurS-M	Thomas Hardy	Surry County	Scoping Meeting
SurS-N	Ralph Anderson	Nuclear Energy Institute	Scoping Meeting
SurS-O	Ernest Blount	Surry County Board of Supervisors	Scoping Meeting
SurS-P	Terry Lewis	Surry County	Scoping Meeting
SurS-Q	Jim Dishner		Scoping Meeting
SurS-R	Richard Blount	Dominion	Scoping Meeting
SurS-S	Bill Bolin	Dominion	Scoping Meeting
SurS-T	Fred Quayle	Virginia Senate	Scoping Meeting
SurS-U	James Brown	Dominion	Scoping Meeting
SurS-V	Bill Subjack		Scoping Meeting

Specific comments were categorized and consolidated by topic. Comments with similar specific objectives were combined to capture the common essential issues raised by the commenters. The comments fall into one of several general groups. These groups include:

- Specific comments that address environmental issues within the purview of the NRC environmental regulations related to license renewal. These comments address Category 1 or Category 2 issues or issues that were not addressed in the GEIS. They also address alternatives and related Federal actions.

- General comments (1) in support of, or opposed to, nuclear power or license renewal or (2) on the license renewal process, the NRC's regulations, and the regulatory process. These comments may or may not be specifically related to 1the Surry Units 1 and 2 license renewal application.

- Questions that do not provide new information.

- Specific comments that address issues that do not fall within, or are specifically excluded from, the purview of NRC environmental regulations. These comments typically address issues such as the need for power, emergency preparedness, current operational safety issues, and safety issues related to operation during the renewal period.

Each comment applicable to this environmental review is summarized in this section. This information, which was extracted from the Surry Power Station Scoping Summary Report, is provided for the convenience of those interested in the scoping comments applicable to this environmental review. The comments that are general or outside the scope of the environmental review for Surry Units 1 and 2 are not included here. More detail regarding the disposition of general or nonapplicable comments can be found in the Summary Report. The accession number for the Summary Report is ML020160586 in the NRC's Agencywide Document Access and Management System (ADAMS).

This accession number is provided to facilitate access to the document through the Public Electronic Reading Room (ADAMS), http://www.nrc.gov/reading-rm.html.

The following pages summarize the comments and suggestions received as part of the scoping process that are applicable to this environmental review, and discuss the disposition of the comments and suggestions. The parenthetical alpha-numeric identifier after each comment refers to the comment set (Commenter ID) and the comment number.

Comments in this section are grouped in the following categories:

1. Category 1 Socioeconomic Issues
2. Category 1 Decommissioning Issues
3. Category 2 Aquatic Ecology Issues
4. Category 2 Threatened and Endangered Species Issues
5. Category 2 Socioeconomic Issues
6. Category 2 Historical and Archaeological Resource Issues

1. Comments Concerning Category 1 Socioeconomic Issues

As stated in 10 CFR Part 51, Table B-1, Category 1 socioeconomic issues include:

- Public services: public safety, social services, and tourism and recreation
- Public services, education (license renewal term)
- Aesthetics impacts (refurbishment)
- Aesthetics impacts (license renewal term)
- Aesthetics impacts of transmission lines (license renewal term)

Comment: Dominion Power has proven to be a great corporate citizen and steward for the environment. (SurS-E-2)

Comment: Dominion's commitment in Isle of Wight, in particular, has been demonstrated in a big way through the United Way effort. (SurS-F-5)

Comment: Dominion assisted in 12 nonprofit agencies in Isle of Wight on a yearly basis, enabling us to meet the needs of those less fortunate in our community. (SurS-F-6)

Comment: As well when a recent devastating hurricane hit southeastern Virginia, the Surry employees joined forces with other Dominion employees, to provide canned foods and household items for those who suffered the loss of homes and property. (SurS-F-7)

Comment: We (Surry) have strived to be a good corporate citizen. (SurS-I-13)

Comment: The employees have volunteered their time to build an amphitheater over at Chippokes, to paint some buildings over there. (SurS-K-3)

Comment: We view the power station as a great corporate neighbor to the county. (SurS-Q-2)

Comment: Our volunteer programs and participation is key to Dominion's corporate philosophy. And we continue this commitment to our communities in the future. (SurS-R-12)

Response: *The comments are noted. The comments are supportive of license renewal at Surry Power Station Units 1 and 2. Public services were evaluated in the GEIS and determined to be a Category 1 issue. Information regarding the impact on social services is discussed in Chapter 4 of the SEIS.*

Comment: The Surry plant has provided for a great number of educational purposes. (SurS-C-2)

Comment: Revenues from Surry have helped the county to do many things to improve itself. For instance we have probably one of the better education systems in the state of Virginia. (SurS-P-3)

Response: *The comments are noted. The comments are supportive of license renewal at Surry Power Station Units 1 and 2. Public services were evaluated in the GEIS and determined to be a Category 1 issue. Information regarding the impact on education is discussed in Chapter 4 of the SEIS*.

Comment: The containment structures for Surry were constructed below grade so as to reduce the visual impact to the historic James Town and Colonial Williamsburg sites. (SurS-J-2)

Comment: Another example of the design feature was the fact that the containment structures were constructed below grade so as to reduce the visual impact to the historic James Town and Colonial Williamsburg. (SurS-S-1)

Response: *The comments are noted. The comments are supportive of license renewal at Surry Power Station Units 1 and 2. Aesthetic impacts were evaluated in the GEIS and determined to be a Category 1 issue. Information regarding the impact of Surry Power Station structures on the natural landscape and scenic vistas is discussed in Chapter 4 of the SEIS.*

2. <u>Comments Concerning Category 1 Decommissioning Issues</u>

As stated in 10 CFR Part 51, Table B-1, Category 1 decommissioning issues include:

- Radiation doses
- Waste management
- Air quality

- Water quality
- Ecological resources
- Socioeconomic impacts

Comment: If we close down that facility we recognize the fact that we would have to put into place all types of security just to make certain that what remains in the county, the residue in terms of radioactive material, would have to be guarded. (SurS-P-11)

Comment: Losing Surry in terms of being a tax asset to the county, but also we pick up the liability in terms of having to provide the services that would be necessary to keep Surry county secure in the event that the plant itself is closed. (SurS-P-12)

Response: *The comments are noted; however, the statements are not accurate. Once the plant is permanently shut down, it will be decommissioned and the license will be terminated. To date, all nuclear power plants that have been decommissioned and have had their license terminated have had unrestricted access, which allows the site to be used for other activities and does not require any additional security or monitoring. If fuel is maintained onsite in an Independent Spent Fuel Storage Installation (ISFSI), a license for the ISFSI will be maintained and any required security and monitoring would be provided by the licensee. Decommissioning issues are Category 1 issues as evaluated in the GEIS. The comments provide no new information; therefore, the comments will not be evaluated further.*

3. Comments Concerning Category 2 Aquatic Ecology Issues

As stated in 10 CFR Part 51, Table B-1, Category 2 aquatic ecology issues are:

- Entrainment of fish and shellfish in early life stages
- Impingement of fish and shellfish
- Heat shock

Comment: We designed Surry Power Station such that the water that is released from the power station goes around Hog Island such to protect the oyster beds. (SurS-I-9)

Comment: We designed a structure, which takes in, as water comes in, removes fish from the water, protects them, and puts them back. (SurS-I-10)

Comment: The discharge for the Surry station was placed upstream to prevent, or to protect the oyster beds downstream. (SurS-J-1)

Comment: Surry has state-of-the-art withdraw screens, which are at the intake structure to protect fish. (SurS-J-4)

Comment: In the mid to late ’70s we conducted a study that led to the impacts of this waste heat on the bottom of the James River. Basically we found no long-term deleterious effects. And the Virginia State Water Control Board, which is now called the Department of Environmental Quality, agreed with our findings. (SurS-J-8)

Comment: Water withdrawal issues were looked at, also. Water withdrawal represents the water that I mentioned earlier, that is used for cooling. The Virginia Institute of Marine Sciences studied the water withdrawal issue, and again demonstrated no long-term deleterious effects on the James River ecosystem. And, again, the water board, now VEQ, concurred with our findings. (SurS-J-9)

Comment: Our waterways, our water streams, Surry has safety in mind, you know, with our fish and wildlife, even at the intake. And they have designed a special fish separating system intake screen that separates, and where it goes into the James River as well. (SurS-O-8)

Comment: We designed Surry Power Station such that when the water that is released from the power station, that it does not impact the oyster beds. The station was turned such that water goes out, and by the time it gets to the oyster beds it is all cooled down again. (SurS-R-8)

Comment: Surry has developed the structure such that when fish are coming in, the structure picks up the fish, and puts them back into the river without being harmed. (SurS-R-9)

Comment: In the mid to late ’70s Surry conducted a study that looked at the impacts of this waste heat on the biology of the James River. Basically we found no long-term deleterious effects. The Virginia State Water Control Board, which is now called the Department of Environmental Quality, agreed with our findings. (SurS-S-6)

Comment: Water withdrawal issues were looked at, also. Water withdrawal represents the water that I mentioned earlier, that is used for cooling. The Virginia Institute of Marine Sciences studied the water withdrawal issue, and again they demonstrated no long-term deleterious effects on the James River ecosystem, which the water board agreed with, also. (SurS-S-7)

Response: *The comments are noted. The comments relate to aquatic ecology and are supportive of license renewal at Surry Power Station Units 1 and 2. Aquatic ecology is addressed in Chapter 4 of the SEIS.*

4. Comments Concerning Category 2 Threatened and Endangered Species Issues

As stated in 10 CFR Part 51, Table B-1, Category 2 threatened and endangered species issues are:

- Threatened or endangered species.

Comment: Surry looked at such issues as waste heat, water withdrawal, and threatening of endangered species. (SurS-J-7)

Comment: Our research showed no impact to any threatened and endangered species as a result of operation of Surry and its associated transmission lines. In fact one of the most long-lived and successful bald eagle nest in Chesapeake bay population is located on Surry Power Station property. (SurS-J-10)

Comment: Some of the issues that we (Surry) looked at, at Surry, include such things as waste heat, water withdrawal, and threatened and endangered species. (SurS-S-5)

Comment: The evaluation of threatened and endangered species was a little different, in that we had to go to state and federal agencies to investigate possible impacts on listed species, since species are continually being listed. The research showed no impact to any threatened and/or endangered species as a result of the operation of the station, and its associated transmission lines. In fact one of the most long-lived and successful bald eagle nest in Chesapeake bay population is located on the station property. (SurS-S-9)

Response: *The comments are noted. The comments acknowledge the importance of the manner in which Surry Power Station operates the site to the benefit of threatened and endangered species. This issue is addressed in Chapter 4 of the SEIS.*

5. Comments Concerning Category 2 Socioeconomic Issues

As stated in 10 CFR Part 51, Table B-1, Category 2 socioeconomic issues are:

- Housing
- Public services, public utilities
- Public services, education (refurbishment)
- Offsite land use (refurbishment)
- Offsite land use (license renewal term)
- Public services, transportation

Comment: Surry provides a tremendous employment base. (SurS-D-8)

Comment: Surry has also been a model corporate citizen, and have helped many organizations in the county, plus provided jobs and an enormous tax base. (SurS-G-2)

Comment: License Renewal will assure that the local economy will continue to reap the benefits of the large number of employees at Surry Power Station. (SurS-I-2)

Comment: Since 1966 130 million dollars has gone to Surry County. (SurS-I-3)

Comment: With regard to socioeconomic issues, we found contribution to the local infrastructure. (SurS-J-11)

Comment: Surry provided 10.3 million dollars in taxes last year for a county of 6,000 people. (SurS-K-1)

Comment: From a business point of view, I have a restaurant, a small inn. Surry helps us to keep our employee level high through the year. (SurS-K-2)

Comment: We are impressed and proud of the fact that we receive a tax base here. And we are, more so, pleased with the fact that you employ some of our citizens. (SurS-L-3)

Comment: Surry has a profound effect on your tax base. (SurS-N-4)

Comment: Surry Power Station provides significant tax revenue for Surry County. (SurS-O-10)

Comment: Surry employment provides employment for 900 to 1,000 people at the power station, which contributes to the local economics here in the community, and surrounding areas throughout Virginia. (SurS-O-11)

Comment: Surry Power Station has been of great benefit to the county, in terms of the tax revenues that are generated by the plant for Surry. (SurS-P-2)

Comment: Revenues from Surry have helped the county to do many things to improve itself. For instance we have probably one of the better education systems in the state of Virginia. (SurS-P-3)

Comment: Surry Power Station allows Surry County to be a net producer of jobs. (SurS-P-5)

Comment: The jobs that are available at Surry Power Station are high end, high paying jobs, highly skilled, highly technical people are employed in those jobs. (SurS-P-6)

Comment: Surry will also ensure that our local economy will continue to reap the benefits of a large employer in the area. (SurS-R-2)

Comment: Surry County will continue to receive the tax revenue from the station operation. (SurS-R-3)

Comment: Surry Power Station will continue to have jobs well into this century. (SurS-R-4)

Comment: With regard to socioeconomic issues, we (Surry) found positive contribution to the local infrastructure, much of which you've heard about tonight. (SurS-S-10)

Comment: For the time that, since 1966, the Surry Power Station has pumped 130 million dollars into the economy of this county. It has provided jobs for 850 people, many of whom live in this county. (SurS-T-2)

Comment: Without Dominion Power we won't get no businesses. We use that to show that we have a low tax base, and we use that to show that we have power to give you. (SurS-U-3)

Response: *The comments are noted. The comments support license renewal at Surry Power Station Units 1 and 2. Socioeconomic issues specific to the plant are Category 2 issues and are addressed in Chapter 4 of the SEIS.*

6. <u>Comments Concerning Category 2 Historical and Archaeological Resource Issues</u>

Comment: Because there would be no new construction activity at Surry, we are going to continue to use the same facilities, the continued operation of the station means that there will be, the impacts to the cultural resource will also be negligible. (SurS-J-12)

Comment: There will be no new construction activity at Surry of a major consequence, so therefore the cultural resource impacts would be negligible. (SurS-S-11)

Response: *The comments are noted. The comments are supportive of license renewal at Surry Power Station Units 1 and 2. Historical and archaeological resources are addressed as Category 2 issues. Potential impacts to historical and archaeological resources are addressed in Chapter 4 of the SEIS.*

Part II - Comments Received on the Draft SEIS

Pursuant to 10 CFR Part 51, the staff transmitted the *Generic Environmental Impact Statement for License Renewal of Nuclear Plants, Regarding Surry Power Station Units 1 and 2, Draft Report for Comment* (NUREG-1437, Supplement 6, referred to as the draft SEIS) to Federal, State, and local government agencies as well as interested members of the public. As part of the process to solicit public comments on the draft SEIS, the staff:

- placed a copy of the draft SEIS into the NRC's electronic Public Document Room, its license renewal website, and at the Swem Library at the College of William and Mary, Williamsburg, Virginia
- sent copies of the draft SEIS to the applicant, members of the public who requested copies, and certain Federal, State, and local agencies
- published a notice of availability of the draft SEIS in the Federal Register on April 25, 2002 (67 FR 20554)
- issued public announcements, such as advertisements in local newspapers and postings in public places, of the availability of the draft SEIS
- announced and held two public meetings in Surry, Virginia, on May 29, 2002, to describe the results of the environmental review and answer related questions
- issued public service announcements and press releases announcing the issuance of the draft SEIS, the public meetings, and instructions on how to comment on the draft SEIS
- established a website to receive comments on the draft SEIS through the Internet.

During the comment period, the staff received a total of 2 comment letters in addition to the comments received during the public meetings.

The staff has reviewed the public meeting transcripts and the 2 comment letters that are part of the docket file for the application, all of which are available in the NRC's electronic Public Document Room. Appendix A, Part II, Section A.1 contains a summary of the comments and the staff's responses. Related issues are grouped together. Appendix A, Part II, Section A.2 contains excerpts of the May 29, 2002, public meeting transcripts, the written statements provided at the public meetings, and comment letters.

Each comment identified by the staff was assigned a specific alpha-numeric identifier (marker). That identifier is typed in the margin of the transcript or letter at the beginning of the discussion of the comment. A cross-reference of the alpha-numeric identifiers, the speaker or author of the comment, the page where the comment can be found, and the section(s) of this report in which the comment is addressed is provided in Table A-2. The speakers at the meetings are listed in speaking order along with the page of the transcript excerpts in this report on which the comment appears. These comments are identified by the letters "SurD" followed by a number that identifies each comment in approximate chronological order in which the comments were made. The written statements (from the public meetings) and written comment letters are also identified by the letters "SurD."

The staff made a determination on each comment that it was one of the following:

(1) a comment that was actually a request for information and introduced no new information.

(2) a comment that was either related to support or opposition of license renewal in general (or specifically Surry Power Station Units 1 and 2) or that made a general statement about the license renewal process. It may have made only a general statement regarding Category 1 and/or Category 2 issues. In addition, it provided no new information and does not relate to safety considerations reviewed under 10 CFR Part 54.

(3) a comment about a Category 1 issue that

- provided new information that required evaluation during the review, or
- provided no new information

(4) a comment about a Category 2 issue that

- provided information that required evaluation during the review, or
- provided no such information

(5) a comment that raised an environmental issue that was not addressed in the GEIS or the draft SEIS

(6) a comment on safety issues pertaining to 10 CFR Part 54, or

(7) a comment outside the scope of license renewal (not related to 10 CFR Parts 51 or 54).

There was no significant new information provided on Category 1 issues [(3)(a) above]. A comment from the U.S. Fish and Wildlife Service led the NRC staff to prepare a biological

assessment related to bald eagles for the Category 2 issue, “Threatened or Endangered Species”.

Comments without a supporting technical basis or without any new information are discussed in this appendix, and not in other sections of this report. Relevant references that address the issues within the regulatory authority of the NRC are provided where appropriate. Many of these references can be obtained from the NRC Electronic Public Document Room.

Within each section of Part II of this appendix (A.1.1 through A.1.21), similar comments are grouped together for ease of reference, and a summary description of the comments is given, followed by the staff’s response. Where the comment or question resulted in a change in the text of the draft report, the corresponding response refers the reader to the appropriate section of this report where the change was made. Revisions to the text in the draft report are designated by vertical lines beside the text.

Some numbers were initially assigned to portions of verbal or written statements that were later determined not to be comments. These items were removed from the table. As a result, not all numbers are sequential (see Table A-2).

Table A-2. Surry Power Station Units 1 and 2 SEIS Comment Log

Number	Speaker or Author	Comment Source	Page of Comment	Section(s) Where Addressed
SurD-A-1	F. Quayle	Afternoon Meeting Notes (5/29/01)	A-17	A.1.1
SurD-A-2	F. Quayle	Afternoon Meeting Notes (5/29/01)	A-17	A.1.1
SurD-A-3	F. Quayle	Afternoon Meeting Notes (5/29/01)	A-17	A.1.1
SurD-A-4	F. Quayle	Afternoon Meeting Notes (5/29/01)	A-26	A.1.9
SurD-A-5	F. Quayle	Afternoon Meeting Notes (5/29/01)	A-17	A.1.1
SurD-A-6	F. Quayle	Afternoon Meeting Notes (5/29/01)	A-17	A.1.1
SurD-A-7	F. Quayle	Afternoon Meeting Notes (5/29/01)	A-27	A.1.10
SurD-A-8	F. Quayle	Afternoon Meeting Notes (5/29/01)	A-26	A.1.9
SurD-A-9	F. Quayle	Afternoon Meeting Notes (5/29/01)	A-28	A.1.11
SurD-A-10	F. Quayle	Afternoon Meeting Notes (5/29/01)	A-24	A.1.8
SurD-A-11	F. Quayle	Afternoon Meeting Notes (5/29/01)	A-17	A.1.1
SurD-A-12	F. Quayle	Afternoon Meeting Notes (5/29/01)	A-17	A.1.1

Table A.2. (contd)

Number	Speaker or Author	Comment Source	Page of Comment	Section(s) Where Addressed
SurD-B-1	B. Barlow	Afternoon Meeting Notes (5/29/01)	A-18	A.1.1
SurD-B-3	B. Barlow	Afternoon Meeting Notes (5/29/01)	A-28	A.1.11
SurD-B-4	B. Barlow	Afternoon Meeting Notes (5/29/01)	A-22	A.1.6
SurD-B-5	B. Barlow	Afternoon Meeting Notes (5/29/01)	A-18	A.1.1
SurD-B-7	B. Barlow	Afternoon Meeting Notes (5/29/01)	A-21	A.1.2
SurD-B-9	B. Barlow	Afternoon Meeting Notes (5/29/01)	A-22	A.1.4
SurD-B-11	B. Barlow	Afternoon Meeting Notes (5/29/01)	A-18	A.1.1
SurD-C-1	T. Lewis	Afternoon Meeting Notes (5/29/01)	A-18	A.1.1
SurD-C-5	T. Lewis	Afternoon Meeting Notes (5/29/01)	A-24	A.1.8
SurD-C-6	T. Lewis	Afternoon Meeting Notes (5/29/01)	A-24	A.1.8
SurD-C-7	T. Lewis	Afternoon Meeting Notes (5/29/01)	A-24	A.1.8
SurD-C-8	T. Lewis	Afternoon Meeting Notes (5/29/01)	A-21	A.1.3
SurD-C-9	T. Lewis	Afternoon Meeting Notes (5/29/01)	A-18	A.1.1
SurD-D-1	L. Daniels	Afternoon Meeting Notes (5/29/01)	A-18	A.1.1
SurD-D-2	L. Daniels	Afternoon Meeting Notes (5/29/01)	A-25	A.1.8
SurD-D-3	L. Daniels	Afternoon Meeting Notes (5/29/01)	A-25	A.1.8
SurD-D-4	L. Daniels	Afternoon Meeting Notes (5/29/01)	A-25	A.1.8
SurD-D-5	L. Daniels	Afternoon Meeting Notes (5/29/01)	A-22	A.1.6
SurD-D-6	L. Daniels	Afternoon Meeting Notes (5/29/01)	A-23	A.1.6
SurD-D-7	L. Daniels	Afternoon Meeting Notes (5/29/01)	A-18	A.1.1
SurD-E-1	J. Lyttle	Afternoon Meeting Notes (5/29/01)	A-23	A.1.6
SurD-E-2	J. Lyttle	Afternoon Meeting Notes (5/29/01)	A-23	A.1.6
SurD-F-1	T. Sowers	Afternoon Meeting Notes (5/29/01)	A-18	A.1.1
SurD-F-2	T. Sowers	Afternoon Meeting Notes (5/29/01)	A-25	A.1.8
SurD-F-3	T. Sowers	Afternoon Meeting Notes (5/29/01)	A-25	A.1.8
SurD-F-6	T. Sowers	Afternoon Meeting Notes (5/29/01)	A-28	A.1.11
SurD-F-7	T. Sowers	Afternoon Meeting Notes (5/29/01)	A-18	A.1.1

Table A.2. (contd)

Number	Speaker or Author	Comment Source	Page of Comment	Section(s) Where Addressed
SurD-F-8	T. Sowers	Afternoon Meeting Notes (5/29/01)	A-18	A.1.1
SurD-F-9	T. Sowers	Afternoon Meeting Notes (5/29/01)	A-18	A.1.1
SurD-F-10	T. Sowers	Afternoon Meeting Notes (5/29/01)	A-28	A.1.11
SurD-F-11	T. Sowers	Afternoon Meeting Notes (5/29/01)	A-23	A.1.6
SurD-G-1	J. White	Afternoon Meeting Notes (5/29/01)	A-18	A.1.1
SurD-G-4	J. White	Afternoon Meeting Notes (5/29/01)	A-19	A.1.1
SurD-G-5	J. White	Afternoon Meeting Notes (5/29/01)	A-19	A.1.1
SurD-G-6	J. White	Afternoon Meeting Notes (5/29/01)	A-19	A.1.1
SurD-G-7	J. White	Afternoon Meeting Notes (5/29/01)	A-21	A.1.2
SurD-G-8	J. White	Afternoon Meeting Notes (5/29/01)	A-19	A.1.1
SurD-H-2	P. Stephenson	Evening Meeting Transcript (5/29/01)	A-21	A.1.2
SurD-H-3	P. Stephenson	Evening Meeting Transcript (5/29/01)	A-28	A.1.11
SurD-H-4	P. Stephenson	Evening Meeting Transcript (5/29/01)	A-19	A.1.1
SurD-I-1	P. Small	Evening Meeting Transcript (5/29/01)	A-19	A.1.1
SurD-I-2	P. Small	Evening Meeting Transcript (5/29/01)	A-19	A.1.1
SurD-I-3	P. Small	Evening Meeting Transcript (5/29/01)	A-25	A.1.8
SurD-I-4	P. Small	Evening Meeting Transcript (5/29/01)	A-28	A.1.11
SurD-J-1	J. Newby	Evening Meeting Transcript (5/29/01)	A-19	A.1.1
SurD-J-2	J. Newby	Evening Meeting Transcript (5/29/01)	A-23	A.1.6
SurD-J-3	J. Newby	Evening Meeting Transcript (5/29/01)	A-25	A.1.8
SurD-J-4	J. Newby	Evening Meeting Transcript (5/29/01)	A-25	A.1.8
SurD-J-5	J. Newby	Evening Meeting Transcript (5/29/01)	A-25	A.1.8
SurD-J-6	J. Newby	Evening Meeting Transcript (5/29/01)	A-23	A.1.6
SurD-K-1	R. Turner	Evening Meeting Transcript (5/29/01)	A-23	A.1.6
SurD-K-2	R. Turner	Evening Meeting Transcript (5/29/01)	A-26	A.1.8
SurD-K-4	R. Turner	Evening Meeting Transcript (5/29/01)	A-23	A.1.6
SurD-K-5	R. Turner	Evening Meeting Transcript (5/29/01)	A-23	A.1.6

Table A.2. (contd)

Number	Speaker or Author	Comment Source	Page of Comment	Section(s) Where Addressed
SurD-K-6	R. Turner	Evening Meeting Transcript (5/29/01)	A-20	A.1.1
SurD-L-1	T. Sowers	Evening Meeting Transcript (5/29/01)	A-20	A.1.1
SurD-L-2	T. Sowers	Evening Meeting Transcript (5/29/01)	A-20	A.1.1
SurD-L-3	T. Sowers	Evening Meeting Transcript (5/29/01)	A-28	A.1.11
SurD-L-4	T. Sowers	Evening Meeting Transcript (5/29/01)	A-26	A.1.8
SurD-L-6	T. Sowers	Evening Meeting Transcript (5/29/01)	A-26	A.1.8
SurD-L-8	T. Sowers	Evening Meeting Transcript (5/29/01)	A-28	A.1.11
SurD-L-11	T. Sowers	Evening Meeting Transcript (5/29/01)	A-20	A.1.1
SurD-L-12	T. Sowers	Evening Meeting Transcript (5/29/01)	A-20	A.1.1
SurD-L-14	T. Sowers	Evening Meeting Transcript (5/29/01)	A-18	A.1.1
SurD-L-15	T. Sowers	Evening Meeting Transcript (5/29/01)	A-28	A.1.11
SurD-L-16	T. Sowers	Evening Meeting Transcript (5/29/01)	A-20	A.1.1
SurD-L-18	T. Sowers	Evening Meeting Transcript (5/29/01)	A-23	A.1.6
SurD-M-6	J. White	Evening Meeting Transcript (5/29/01)	A-20	A.1.1
SurD-M-7	J. White	Evening Meeting Transcript (5/29/01)	A-21	A.1.2
SurD-M-8	J. White	Evening Meeting Transcript (5/29/01)	A-20	A.1.1
SurD-N-1	D. Christian	Letter (7/2/02)	A-29	A.1.12
SurD-N-2	D. Christian	Letter (7/2/02)	A-29	A.1.12
SurD-N-3	D. Christian	Letter (7/2/02)	A-29	A.1.12
SurD-N-4	D. Christian	Letter (7/2/02)	A-29	A.1.12
SurD-N-5	D. Christian	Letter (7/2/02)	A-29	A.1.12
SurD-N-6	D. Christian	Letter (7/2/02)	A-29	A.1.12
SurD-N-7	D. Christian	Letter (7/2/02)	A-30	A.1.12
SurD-N-8	D. Christian	Letter (7/2/02)	A-30	A.1.12
SurD-N-9	D. Christian	Letter (7/2/02)	A-30	A.1.12
SurD-N-10	D. Christian	Letter (7/2/02)	A-30	A.1.12
SurD-N-11	D. Christian	Letter (7/2/02)	A-30	A.1.12

Table A.2. (contd)

Number	Speaker or Author	Comment Source	Page of Comment	Section(s) Where Addressed
SurD-O-1	M. Chezik	Letter (7/10/02)	A-27	A.1.10
SurD-O-2	M. Chezik	Letter (7/10/02)	A-26	A.1.9
SurD-O-3	M. Chezik	Letter (7/10/02)	A-26	A.1.9
SurD-O-4	M. Chezik	Letter (7/10/02)	A-27	A.1.10
SurD-O-5	M. Chezik	Letter (7/10/02)	A-22	A.1.5
SurD-P-1	O. Shehab	Letter (9/30/02)	A-24	A.1.7
SurD-P-2	O. Shehab	Letter (9/30/02)	A-24	A.1.7

(a) This comment was determined upon later review to either be combined with another comment or to be un-related to the scope of the SEIS.

A.1 Comments and Responses

A.1.1 General Comments in Support of License Renewal at Surry Power Station Units 1 and 2

Comment: The Surry plant has a good safety record and the operators are well trained. (SurD-A-1)

Comment: The plant has both environmental and socioeconomic impacts on the area. (SurD-A-2)

Comment: Dominion is environmentally responsible, using technology to protect environmental resources. (SurD-A-3)

Comment: Dominion was among the first companies to establish a permanent environmental group. (SurD-A-5)

Comment: The plant is operated within the bounds of its permits. (SurD-A-6)

Comment: Surry's record argues for continued operations. (SurD-A-11)

Comment: I support license renewal and am encouraged by the NRC's draft report. (SurD-A-12)

Comment: I support license renewal for Surry. (SurD-B-1)

Comment: Dominion has done an outstanding job; there were some problems early in the life of the plant, but things are much better now. (SurD-B-5)

Comment: I hope that the NRC will grant this license extension. (SurD-B-11)

Comment: This plant is very important to Surry County. (SurD-C-1)

Comment: I think it is important to keep this plant running. (SurD-C-9)

Comment: I've often asked citizens, "What would it be like if the power plant were not here?" They always shake their heads and say, "You don't want to know and we don't even want to think about it. We don't want to go back to the way we were before the power plant was built." (SurD-D-1)

Comment: We know that the power plant has an excellent safety record. Therefore, the citizens aren't worried about the effects of HAVING the nuclear power plant; they are worried about the effects of NOT HAVING the nuclear power plant. (SurD-D-7)

Comment: I am excited about license renewal. (SurD-F-1)

Comment: We believe our proximity to the Hog Island wildlife preserve fits hand-in-glove with efforts to maintain operations that have a minimal impact on the local environment. (SurD-F-7)

Comment: One of those goals is to have no environmental violations (a repeat of the successful 2001 goal). We don't put oil or other contaminants into the ground or waterways. If we have a piece of equipment leak oil, we have a spill prevention and cleanup procedure we invoke and we document the leak in our Corrective Action System where we track what, how and why it happened and what we will do to prevent reoccurrence. (SurD-F-8)

Comment: The station was relatively inexpensive to build, costing about $400 million. When you consider the cost of building new baseload electric generating units in today's economy, that's a bargain. (SurD-F-9)

Comment: I am very proud of Dominion's environmental performance throughout the years I've been employed. (SurD-G-1)

Comment: 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. (SurD-G-4)

Comment: 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. (SurD-G-5)

Comment: 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. (SurD-G-6)

Comment: Current measures to mitigate environmental impacts associated with operations were found to be adequate. (SurD-G-8)

Comment: I am familiar with the recent environmental review performed for the facility and I do agree that the renewal and extension of its license is an excellent energy generation alternative for our local environment and is in the best economic interest for our region and the Commonwealth. (SurD-H-4)

Comment: As a developer, as a public developer, I conduct environmental impact statements and reviews myself on properties we seek to develop and as an anecdotal neighbor of this facility I can only testify to the fact that there has been no significant environmental impact on any of our communities from this facility. No negative impacts whatsoever. So I'm speaking in unqualified support of renewal of this license. (SurD-I-1)

Comment: The fact that we are here today holding a public hearing in such a friendly environment is only a testament to the fact that there are no significant environmental impacts. (SurD-I-2)

Comment: Tonight I [have] come to thank the NRC and all the people at Virginia Power for their commitment to a safe environment here in Surry County and to note that there is a

continued review of our environment and the status that it is here in Surry. This is important to us because the power plant is important to Surry, to Surry Elementary School. (SurD-J-1)

Comment: I certainly, as you well know, speak in favor of the consideration of this and hope that it serves the community well. (SurD-K-6)

Comment: I take great pride in our station. I'm excited about license renewal. (SurD-L-1)

Comment: I started in the Nuclear Navy and I believe this is a very viable and legitimate alternative that we have far under-utilized in nuclear power. (SurD-L-2)

Comment: Our commitment to environmental stewardship dates back to the construction days of the 1960s and 1970s when we implemented many revolutionary design features at the station to maintain the environment and the intake and discharge canal you saw in the picture is one of a kind in this country. The discharge is upriver to protect the oyster beds, the game preserves and the feeding of the birds. (SurD-L-11)

Comment: We believe our proximity to Hog Island Wildlife Preserve fits hand and glove with our efforts to maintain operations that have minimal impact on the local environment. (SurD-L-12)

Comment: The station was relatively inexpensive to build, costing only $400 million. When you consider the cost of replacement power for base level electric generating units that is a real bargain. (SurD-L-14)

Comment: We try to be the best corporate citizen we can. It's also one of our goals. (SurD-L-16)

Comment: Dominion also agrees with the NRC that the potential environmental effects 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. (SurD-M-6)

Comment: The current measures to mitigate environmental impacts associated with operations were found to be adequate. (SurD-M-8)

Response: *The comments are noted. The comments are supportive of license renewal at the Surry Power Station Units 1 and 2, and are general in nature. The comments provide no new*

information, therefore, the comments will not be evaluated further. There was no change to the SEIS text.

A.1.2 Comments Concerning Air Quality Issues

Comment: With respect to air, nuclear is an emissions-free method of power generation compared to fossil fuels; some places (e.g., California) didn't want nuclear plants and they are now paying the price. (SurD-B-7)

Comment: Nor are there any new or increased environmental emissions as a result of this action. (SurD-G-7)

Comment: Nuclear power is an emission-free energy. (SurD-H-2)

Comment: Nor are there any new or increased environmental emissions as a result of this action. (SurD-M-7)

Response: *The comments are noted. Air quality impacts from plant operations were evaluated in the GEIS and found to be minimal. These emissions are regulated through permits issued by the U.S. Environmental Protection Agency and the States. Air quality effects of transmission lines is a Category 1 issue as evaluated in the GEIS. The comments provide no new information and, therefore, will not be evaluated further. There was no change to the SEIS text.*

A.1.3 Comments Concerning Decommissioning Issues

Comment: My only concern would be with decommissioning the plant; it would have a major impact in terms of lost income and lost jobs; also the County would have to pay to maintain the facility. (SurD-C-8)

Response: *The comment is noted; however the statement regarding County payments is not accurate. Once the plant is permanently shutdown, it will be decommissioned and the license will be terminated. To date, all nuclear power plants that have been decommissioned and have had their license terminated, have had unrestricted access, which allows the site to be used for other activities and does not require any additional security or monitoring. If fuel is maintained onsite in an Independent Spent Fuel Storage Installation (ISFSI), a license for the ISFSI will be maintained and any required security and monitoring would be provided by the licensee. Therefore, the County would not bear any financial responsibility for maintaining Surry Power Station. The comment provides no new information; therefore, the comment will not be evaluated further. There was no change to the SEIS text.*

A.1.4 Comments Concerning Land Use Issues

Comment: And on the land, the Hog Island Wildlife Management Area coexists well with its neighbor with no problems. (SurD-B-9)

Response: *The comment is noted. Onsite land use during the renewal period is a Category 1 issue as evaluated in the GEIS. The comment is supportive of license renewal at the Surry Power Station Units 1 and 2. Impacts to land use are addressed in Section 4 of the SEIS. The comment provides no new information and therefore, will not be evaluated further. There was no change to the SEIS text.*

A.1.5 Comments Concerning Archeological and Historic Issues

Comment: The Bureau of Indian Affairs (BIA) requests that the NRC consult with the Tuscarora Tribe regarding impacts to aboriginal territory. (SurD-O-5)

Response: *The comment is noted. On July 29, 2002, NRC sent a letter to the Tuscarora Nation providing them copies of the Surry and the North Anna draft SEISs with a 30-day opportunity to provide comments and share their views. Upon staff review it was determined that the Tuscarora tribe was historically in the North Carolina and Virginia (Roanoke River) region in precontact and early contact days. The Tuscarora maintained strong trading ties with the Powhatan villages located along the James River, including in the vicinity of Surry Power Station Units 1 and 2; however, available historic documentation indicates that the Tuscarora did not actually live in this specific area. In approximately 1722, the Tuscarora tribe was pushed northward by white settlers and eventually became the Sixth Nation of the Iroquois Confederacy. The Tuscarora Nation is similar to other tribes who for various reasons left their traditional homelands some time ago, but may still retain cultural ties to those formerly-occupied areas. The NRC staff did not receive any response from the Tuscarora Nation. Therefore, there was no change to the SEIS text.*

A.1.6 Comments Concerning Category 1 Socioeconomic Issues

Comment: Dominion is a good corporate citizen - conscientious and careful. (SurD-B-4)

Comment: The power station's local involvement is an example of their good corporate citizenship. (SurD-D-5)

Comment: The power station is an outstanding educational partner. (SurD-D-6)

Comment: VEPCo has been a good neighbor and we appreciate the income from the plant and the services that [it] allows us to provide. (SurD-E-1)

Comment: VEPCo contributes to the community in many ways, for example they provided speakers for the County's 350th anniversary activities; the employees help out in the community in many ways. (SurD-E-2)

Comment: We strive to be a good corporate citizen and have enjoyed the professional, supportive working relationship we have with the State and Local officials. Dominion has a long-standing tradition of investing in the communities we serve through volunteer and philanthropic activities. Our employees demonstrate their commitment to their community by participating in Adopt-A-Highway programs, Holiday baskets for the needy, contributing to the United Way, Blood Drives, supporting area scouting programs and many other community activities. We consider community partnership as an important component of the Dominion equation and environmental stewardship as a core component of that partnership. (SurD-F-11)

Comment: You've provided opportunities to explore the areas of math, science and technology in our fourth grade students. The students really enjoy going to the power station to study electricity and to be successful on those SOLs. (SurD-J-2)

Comment: Dominion Power employees provide many hours of volunteer services for community projects such as our Special Olympics Program and our school carnivals and most recently at the 350th Anniversary Speakers Series. (SurD-J-6)

Comment: And enjoyed a wonderful relationship with the good neighbors of Surry and their safety programs that we had with Surry nuclear plant and with the counties as good neighbors working together. (SurD-K-1)

Comment: Surry Nuclear Power Plant has some wonderful community leaders, not only Surry but Virginia Power as a whole, some wonderful community leaders that serve in local government, serve in all kinds of United Way and cancer drives and other things that they are leaders in that lead us and make this area a better place. (SurD-K-4)

Comment: They learn as you well have heard tonight of all the regulations and things that they've done prior to these people getting here. They help people from their staff every time there's a need in the community or a need in the Tidewater area. (SurD-K-5)

Comment: We're a leading contributor from the state, of course, for United Way, and the Scouting programs and many other community activities that we sponsor. We consider our

community partnership an important part of our equation and environmental stewardship, that's a core component of that partnership. (SurD-L-18)

Response: *The comments are noted. The comments are supportive of license renewal at the Surry Power Station Units 1 and 2. Public services were evaluated in the GEIS and determined to be a Category 1 issue. Information regarding the impact on socioeconomics are discussed in Chapter 4 of the SEIS. The comments provide no new information and therefore, will not be evaluated further. There was no change to the SEIS text.*

A.1.7 Comments Concerning Category 1 Water Use and Quality

Comment: Sanitary wastes generated at the facility receive treatment provided by an on-site activated sludge treatment plant (design flow of 0.085 MGD). The wastewater goes through flow equalization, screening, grinding, activated sludge treatment, settling and disinfection. The treated wastewater is finally discharged into the effluent discharge canal. Sludge is aerobically digested, then pumped and hauled by a local contractor for final disposal. (SurD-P-1)

Comment: The permit requires VEPCo to take immediate steps to achieve a non-detectable chlorine concentration in the final effluent if detectable chlorine concentrations are noted. (SurD-P-2)

Response: *The comments are noted. The SEIS text was modified to incorporate these comments.*

A.1.8 Comments Concerning Category 2 Socioeconomic Issues

Comment: The plant pays $10.94 million in taxes to the county, and employs about 850 people at an average salary of $56,400, much of which feeds back into the local economy. (SurD-A-10)

Comment: The plant is the largest employer in Surry County and one of the largest in the surrounding area; the jobs are high-paying, with many of the employees commuting into the County; so the benefits are spread around the area. (SurD-C-5)

Comment: The plant pays about $10 million to the county, compared to the county operating budget of about $25 million; this is good for the county, particularly the school system, which ranks among the highest in the state in terms of the amount of money spent on each student; and they rank high even compared to northern Virginia where the average household incomes are much higher. (SurD-C-6)

Comment: The plant and its employees also purchase locally, adding to the local economy. (SurD-C-7)

Comment: The significant amount of money in property taxes paid by Dominion provide a great source of assurance that the county will be able to meet the needs of the community. (SurD-D-2)

Comment: We now have modern, up-to-date schools of which everyone can be proud. Because of the power plant our children have the learning environment they deserve. (SurD-D-3)

Comment: The power station provides employment opportunities, thereby giving household income to many residents of the county who, in turn, contribute to the local economy. (SurD-D-4)

Comment: A renewed license is not only important for Surry County and Virginia, but also for more than 850 other fulltime Surry employees whose livelihood depends on providing safe and reliable electricity to customers in this state. (SurD-F-2)

Comment: A renewed license will provide assurance that the local economy will continue to reap the benefit of having a large employer in the area and that Surry County will continue to receive tax revenue from the Station's operations. (SurD-F-3)

Comment: The plant has a significant economic impact on our region. Fifteen percent of the Commonwealth's power is produced by this facility. (SurD-I-3)

Comment: Revenues generated through Dominion Power enables the school system to implement programs such as after school tutoring, Saturday school and summer school and because of these programs and more programs that we implement, Surry Elementary has achieved next to the top state rating for school accreditation and is accredited through Southern Association of Schools and Colleges and receives state recognition for the National Blue Ribbon Schools Award. Some of our teachers have applied for the mini grant that has been offered by Dominion Power and we've been able to implement special programs. (SurD-J-3)

Comment: And as a citizen of Surry County, Dominion Power is significantly meaningful to taxpayers in that it provides tax revenues that allows citizens in Surry to enjoy a quality of lifestyle at a compatible real estate property tax rate and at a personal property rate that is much lower than surrounding localities. (SurD-J-4)

Comment: The power plant has proven to be a responsible industry that not only provides energy for consumer use, but provides citizens of the county with employment opportunity. (SurD-J-5)

Comment: Where would Surry County Schools be, where would the local government be without the support and help in the past as well as in the future, where would Hampton Roads and the economy of the State of Virginia be without these nuclear power plants supplying good, economical power for our businesses here? (SurD-K-2)

Comment: It's wonderful for me and 850 other employees at the station. It's a livelihood over there. (SurD-L-4)

Comment: Renewed licenses will provide assurance that the local economy will continue to reap the benefit of having the large employer in the area and the tax benefits associated with that. (SurD-L-6)

Response: *The comments are noted. The comments support license renewal at the Surry Power Station Unit 1 and 2. Socioeconomic issues specific to the plant are Category 2 issues and are addressed in Chapter 4 of the SEIS. The comments provide no new information and therefore, will not be evaluated further. There was no change to the SEIS text.*

A.1.9 Comments Concerning Category 2 Aquatic Resource Issues

Comment: Dominion placed the cooling water discharge upstream of the intake to protect oyster beds. (SurD-A-4)

Comment: Dominion developed and patented an intake screen design to protect fish. (SurD-A-8)

Comment: Regarding aquatic species, the cooling water intake structures at the Power Station are nearly the state of the art. (SurD-O-2)

Comment: The Dominion Energy Company has developed a cooling water intake that is effective at minimizing aquatic impacts. The traveling mesh screens are spray washed and the biota is removed from the screens and returned to the river. The traveling screen and wash system clearly minimize aquatic impacts. To further minimize the impacts, in the process of replacing worn or damaged screens, the screens should be replaced with mesh less than or equal to one millimeter wide, with entrance velocities less than or equal to 0.5 feet per second. (SurD-O-3)

Response: *The comments are noted. The comments relate to design features of the plant that minimize the impact to the aquatic environment.*

Under the Clean Water Act, VEPCo submitted a 316(b) demonstration for Surry Power Station in 1980. The Virginia State Water Control Board, the permitting authority, determined that the intake design will ensure the protection and propagation of a balanced indigenous community of shellfish, fish, and wildlife in the James River.

Subsequent post-operational studies detailed in Sections 4.1.1 and 4.1.2 of this SEIS did not reveal any adverse impact on fish or shellfish in the James River due to impingement or entrainment. Therefore, additional mitigation is not warranted. The comments provide no new information and, therefore, will not be evaluated further. There was no change to the SEIS text.

A.1.10 Comments Concerning Category 2 Threatened and Endangered Species Issues

Comment: Bald eagles nest near the site. (SurD-A-7)

Comment: The FWS has determined that the Surry operations and minor refurbishment may have the potential to adversely affect natural resources in the area. The federally threatened bald eagle, *Haliaeetus leucocephalus*, may appear to be unaffected, but a scientific approach should be adopted to evaluate and document any population effects. (SurD-O-1)

Comment: The FWS agrees that the potential exists for the Surry Power Station to adversely affect the bald eagle, a federally threatened species nesting and feeding in and around the power facility. The potential impacts were identified in Appendix E of the draft Application for Renewed Operating License (August 24, 2000) and Supplement 6 of the Generic Environmental Impact Statement for License Renewal of Nuclear Plants, April 2002. The potential for incidental mortality associated with the transmission lines is the primary concern.

A secondary concern is the effects of human activity associated with the Stations's operation and refurbishment. Possible evidence of past disturbance is the abandonment of a nest that for four years successfully produced young eagles. The location of the abandoned nest near the Spent Fuel Site suggests the possibility that human activities may have caused the eagles to abandon nesting. The effects of human activity on eagles during Station operations and refurbishment should be evaluated.

Therefore, a site specific Biological Assessment should be prepared to identify and evaluate any potential impacts to the bald eagle in accordance with Section 7 of the Endangered Species Act.

To assist with the review of the bald eagle and other federally or state listed species, in addition to other migratory birds, Dominion Energy should solicit comments from the State of Virginia Department of Game and Inland Fisheries and Heritage programs. These letters from the State should become part of the environmental review and administrative record for this issue. (SurD-O-4)

Response: *The comment is noted. NRC understands FWS' concerns regarding protection of bald eagles. With regard to impacts from plant operations, however, as long as operations at the Surry Power Station, Units 1 and 2, continue to comply with the Bald Eagle Protection Guidelines of Virginia that were prepared in consultation with and approved by FWS, no effects on bald eagles will occur. In response to the comment, the NRC staff has prepared a Biological Assessment (dated November 6, 2002) and has concluded that there are no effects on bald eagles. The text in Section 4.6.2 of the SEIS has been revised to reflect this information.*

A.1.11 Comments Concerning the Need for Power Issues

Comment: Surry supplies 15 percent of the power used in Virginia at low cost. (SurD-A-9)

Comment: The area is proud to be producing 15 percent of the power used in Virginia. (SurD-B-3)

Comment: We're consistently ranked among the most efficient producers of nuclear-generated electricity in the United States. (SurD-F-6)

Comment: In the future, more electricity, not less, will be required to meet growing customer demand. Because of Surry's low production costs, overall safety performance and minimal impact on the environment, we believe that re-licensing the station is the best option for meeting the future electricity needs of Virginians. (SurD-F-10)

Comment: It is an important part of the growing demand for electricity in the Commonwealth of Virginia. (SurD-H-3)

Comment: This facility plays a pivotal role in providing for all our local energy needs. (SurD-I-4)

Comment: It's wonderful to the consumer because we're a low cost producer. (SurD-L-3)

Comment: We're known as low cost producers. We're always ranked within the top five for nuclear fuel costs in the country and have been so for the past 12 years. (SurD-L-8)

Comment: In the future, more electricity, not less, will be needed and we will have to build additional plants. We believe that relicensing this station, though, is the best option for meeting the future electricity needs of this area and Virginia. (SurD-L-15)

Response: *The comments are noted. The need for power is specifically stated to be outside the scope of license renewal (10 CFR 51.95(c)(2)). The comments are interpreted as expressing support for license renewal at the Surry Power Station Units 1 and 2, however, the comments provide no new information and, therefore, will not be evaluated further. There was no change to the SEIS text.*

A.1.12 Editorial Comments

Comment: Page 1-9, Line 7, Table 1-1 indicates that the US Fish and Wildlife Service Migratory Bird Treat Act Permit expired December 31, 2001. 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. (SurD-N-1)

Comment: Page 2-7, Lines 25-26, The statement is made that, “After passing through the condensers, the cooling water enters into a 880-m (2900-ft) discharge tunnel and subsequently flows back into the James River.” This implies that the water flows into the river directly from a 2900-foot long tunnel. The following statement is suggested as a replacement: “After passing through the condensers, the cooling water flows through a tunnel into the head of a 2900-foot discharge canal, and from the canal into the river.” (SurD-N-2)

Comment: Page 2-27, Line 4, It is indicated that approximately 890 permanent employees work at Surry Units 1 and 2. It is suggested that the statement reflect about 880 permanent employees as stated in the Environmental Report Page E-3. (SurD-N-3)

Comment: Page 2-31, Lines 28-30, It is stated that Interstate 95 runs in a north-south direction west of Surry County through the region and connects Richmond to Washington, D.C. to the north and Charlotte, North Carolina to the south. It is suggested that the following words be replaced for the Charlotte connection: “...and to Emporia, Virginia, leading into North Carolina, to the south.” (SurD-N-4)

Comment: Page 2-36, Lines 19-21, The statement is made, “Table 2-8 shows the actual and estimated changes in population...from 1980 to 2030." This could be interpreted as having actual USCB [United States Census Bureau] 2000 numbers, when in fact, they are estimates based on the 1990 census. It is recommended that the statement noting the population decrease for the century be a separate paragraph unto itself. (SurD-N-5)

Comment: Page 2-37, Line 12, and Page 2-49, Line 30, The source for Table 2-8 is given as VEPCo 2000c, and is noted on Page 2-49, Line 30, as "Final Safety Analysis Reports." Contrary to the notation in the GEIS, the source for Table 2-8 is from the reference on Page 2-50, Lines 1-3, and is noted as VEPCo 2001c, which is from the Environmental Report, Page 2-30. It is recommended that the Table 2-8 source be changed to VEPCo 2001c. It is also recommended that the Table 2-8 title add the words "...Based on 1990 Census Data," to clarify the source of the information and to likewise avoid the implication that the source is 2000 census data, noted on Page 2-36, Lines 21-22. It is also recommended that the title of VEPCo 2000c on Page 2-39, Line 30, be changed to "Updated Final Safety Analysis Report," which is the complete title of the reference. (SurD-N-6)

Comment: Page 4-13, Line 3, It is stated, "...at the shoreline (western) end of the dredged intake canal,..." In the License Renewal Application Environmental Report submitted May 29, 2001, the "intake canal" refers to the canal constructed from the low-level intakes to the high-level intakes. The word "channel" refers to the dredged area of the James River that ends at the intake structure, which pumps water into the intake canal. It is suggested that the SEIS replace the word "canal" on Page 4-13, Line 3, with the word "channel," to be consistent with the usage on Page 2-7, Line 18. (SurD-N-7)

Comment: Page 4-15, Lines 4-5, The statement: "The maximum temperature elevation of the water as a result of passing through the condensers...," is a description of a parameter that is not in the existing NPDES permit. The temperature (and conversion) given refers to a delta, and not an actual temperature measurement. It is recommended that the above statement be deleted, as the information is not pertinent to the NPDES permit, and not included in the Surry License Renewal Application Environmental Report. If the statement is retained, it is suggested that the temperature delta be given as 14°F, as provided in the Dominion resource, Final Environmental Impact Statement Surry Power Station, May 1972. (SurD-N-8)

Comment: Page 4-34, Line 13, Page 4-36, Line 2, The statement of Page 4-34 and title of Figure 4-2 on Page 4-36 indicate that the low-income population distribution is from Census 2000. It is Dominion's understanding that the distribution of low-income populations data was not available from Census 2000. The SEIS states on Page 4-26, Line 19, that income data was not available for the 2000 census, so data were used from Census 1990. It is recommended that the statement on Page 4-34, Line 13, and the title of Figure 4-2 on Page 4-36 be changed to attribute the distribution of low-income populations to Census 1990. (SurD-N-9)

Comment: Page 5-6, Line 6, Page 5-9, Line 40, page 5-26, Line 34, On Page 5-6, an RAI is referred to for a VEPCo response on SBO contribution. On Page 5-9, an RAI is referred to for a VEPCo response on external events. On page 5-26, an RAI is referred to for a NRC question

on cost-benefit. It is suggested that the NRC specify the RAI numbers referred to in the text, in order to correlate the appropriate VEPCo responses. (SurD-N-10)

Comment: Page 5-25, Lines 29-30, On Page 5-25 it is written that "...a scaling factor of 0.94 was applied to..." Averted Onsite (Power Replacement) Costs (RPC) formulae. Dominion interprets this description to be incorrect. On Page 4-43 of the License Renewal Application Environmental Report, it states "...the replacement power formula could be reduced by a factor of 0.94, but the generic formula will be conservatively used." Our decision to not apply the 0.94 scaling factor was deliberate and results in conservative cost calculations. (SurD-N-11)

Response: *The comments are noted. As appropriate, the comments resulted in modification of the SEIS text.*

A.2 Public Meeting Transcript Excerpts and Comment Letters

Transcript of the Afternoon Public Meeting on May 29, 2002, in Surry, Virginia

[Introduction, Mr. Cameron]
[Presentation by Mr. Tappert]
[Presentation by Mr. Tabatabai]
[Presentation by Mr. Kugler]
[Presentation by Ms. Hickey]
[Presentation by Mr. Kugler]

The court reporter was not available for the afternoon session. Because no other means to record the meeting could be found, there is no transcript. The following summary of comments made by members of the public is based on notes taken by the NRC staff during the meeting.

SurD-A (1) Hon. Fred Quayle, Virginia State Senate

SurD-A-1 • The Surry plant has a good safety record and the operators are well trained
SurD-A-2 • The plant has both environmental and socioeconomic impacts on the area
SurD-A-3 • Dominion is environmentally responsible, using technology to protect environmental resources
SurD-A-4 • Dominion placed the cooling water discharge upstream of the intake to protect oyster beds
SurD-A-5 • Dominion was among the first companies to establish a permanent environmental group
SurD-A-6 • The plant is operated within the bounds of its permits
SurD-A-7 • Bald eagles nest near the site
SurD-A-8

- Dominion developed and patented an intake screen design to protect fish

SurD-A-9 • Surry supplies 15 percent of the power used in Virginia at low cost

SurD-A-10 • The plant pays $10.94 million in taxes to the county, and employs about 850 people at an average salary of $56,400, much of which feeds back into the local economy

SurD-A-11 • Surry's record argues for continued operations

SurD-A-12 • I support license renewal and am encouraged by the NRC's draft report.

SurD-B (2) Hon. William K. Barlow, Virginia House of Delegates

SurD-B-1 • I support license renewal for Surry

- My wife and her sister grew up near the plant; my wife remains brilliant and beautiful

SurD-B-3 • The area is proud to be producing 15 percent of the power used in Virginia

SurD-B-4 • Dominion is a good corporate citizen - conscientious and careful

SurD-B-5 • Dominion has done an outstanding job; there were some problems early in the life of the plant, but things are much better now

- There are three aspects of plant operation related to the operation of the plant that I want to talk about - air, water, and land.

SurD-B-7 • With respect to air, nuclear is an emissions-free method of power generation compared to fossil fuels; some places (e.g., California) didn't want nuclear plants and they are now paying the price

- For the water resources, Dominion has worked hard to protect them

SurD-B-9 • And on the land, the Hog Island Wildlife Management Area coexists well with its neighbor with no problems

- Public safety is certainly very important to the residents and to Dominion; the plant was carefully designed and training and drills make sure the operators are ready

SurD-B-11 • I hope that the NRC will grant this license extension.

SurD-C (3) Terry D. Lewis, Surry County Administrator

SurD-C-1 • This plant is very important to Surry County

- Since 9/11 there has been heightened concern about the safety of the plant; I have received a number of calls about this issue and I have been able to tell them that the plant is safe

- Dominion focuses on safety; they've had heightened security since 9/11, and I believe the plant is operated safely; they also have an impressive training program

- There are good communications between the plant and the public and local government. The plant is run safely and any problems are quickly communicated to me.

SurD-C-5 • The plant is the largest employer in Surry County and one of the largest in the surrounding area; the jobs are high-paying, with many of the employees commuting into the County; so the benefits are spread around the area

SurD-C-6 • The plant pays about $10 million to the county, compared to the county operating budget of about $25 million; this is good for the county, particularly the school system, which ranks among the highest in the state in terms of the amount of money spent on each student; and they rank high even compared to northern Virginia where the average household incomes are much higher

SurD-C-7 • The plant and its employees also purchase locally, adding to the local economy

SurD-C-8 • My only concern would be with decommissioning the plant; it would have a major impact in terms of lost income and lost jobs; also the County would have to pay to maintain the facility

SurD-C-9 • I think it is important to keep this plant running.

SurD-D (4) M. Laverne Daniels, Superintendent of Schools, Surry County

Ms. Daniels provided a written statement (attached)

SurD-E (5) Judy S. Lyttle, Surry County Board of Supervisors

SurD-E-1 • VEPCo has been a good neighbor and we appreciate the income from the plant and the services that allows us to provide

SurD-E-2 • VEPCo contributes to the community in many ways, for example they provided speakers for the County's 350th anniversary activities; the employees help out in the community in many ways

- The plant is safe, the citizens feel comfortable with it, and we don't want to see them leave

SurD-F (6) Toby Sowers, Director, Surry Power Station Operations and Maintenance

The speaker provided a written copy of his remarks (attached).

SurD-G (7) Jud White, Dominion Department of Environmental Policy and Compliance

The speaker provided a written copy of his remarks (attached).

Transcript of Evening Meeting on May 29, 2002, in Surry, Virginia

[Introduction, Mr. Cameron]
[Presentation by Mr. Tappert]
[Presentation by Mr. Tabatabai]
[Presentation by Mr. Kugler]
[Presentation by Ms. Hickey]
[Presentation by Mr. Kugler]

SurD-H Mr. Stephenson : I'm used to that. That's great. Thank you. Good evening. My name is Peter Stephenson. I'm town manager for the town of Smithfield in adjoining Isle of Wight County. I hold a Master's degree in urban and environmental planning from the University of Virginia. I first became familiar with the Surry Power Station in the 1980s while working as a planner for James City County immediately across the river. Then, as now during the past seven years, I have served as the manager in Smithfield, would say that the Surry Power Station has always been known as a good neighbor.

However, despite my general familiarity with the facility, I had not actually toured the station as a local government official until earlier in 2001, prior to September 11th. I was thoroughly impressed, in fact, almost astounded by the extreme measures taken for plant safety and security. I was very impressed and I'm sure additional steps and enhancements have been made recently in the wake of the national tragedies last year.

I know that safety continues to be a top priority at the Surry Power Station. It must be. Dominion must also be able to rely on the resources of local, state and Federal agencies to protect against threats from outside sources. We're located about 20 minutes, a little less away, but we certainly pledge to assist in every way possible, as many of our residents are employed here in Surry County at the nuclear power station.

SurD-H-2 SurD-H-3 SurD-H-4 Nuclear power is an emission-free energy. It is an important part of the growing demand for electricity in the Commonwealth of Virginia. The Surry Power Station should be proud of its excellent operating record. I am familiar with the recent environmental review performed for the facility and I do agree that the renewal and extension of its license is an excellent energy generation alternative for our local environment and is in the best economic interest for our region and the Commonwealth.

Thank you.

Mr. Cameron: Okay, thank you, Mr. Stephenson. Next we're going to go to Mr. Patrick Small, Director of Economic Development for Isle of Wight County.

Mr. Small: Thank you very much. I only wish we were holding this hearing in the Isle of Wight County Courthouse and we were the net receivers of that $10 million in annual revenue this plant generates. However, we are the neighboring community. I was very pleased to hear the comments about the bald eagles at Hog Island. That refuge was established by Dominion/Virginia Power. It lies directly across the Isle of Wight County line and in fact, borders Isle of Wight County, so I'm pleased to hear those eagles are on a resurgence.

SurD-I-1 As a developer, as a public developer, I conduct environmental impact statements and reviews myself on properties we seek to develop and as an anecdotal neighbor of this facility I can only testify to the fact that there has been no significant environmental impact on any of our communities from this facility. No negative impacts whatsoever. So I'm speaking in unqualified support of renewal of this license. I thank those of you from the Regulatory Commission that conducted this study that are down here. We are relying upon you and the Environmental Protection Agency, and the Department of Environmental Quality at the state level to protect the public health and safety in this area. We expect if there were any significant impacts from this facility that you would have already acted upon those. We expect if there are negative impacts
SurD-I-2 in the future that you will act on those. The fact that we are here today holding a public hearing in such a friendly environment is only a testament to the fact that there are no significant
SurD-I-3 environmental impacts. The plant has a significant economic impact on our region. Fifteen percent of the Commonwealth's power is produced by this facility. Hampton Roads is a net importer of power. We're now looking at alternative energy sources, whether they be wind, whether they be gas or whether they be coal-fired energy suppliers. We as a region are trying
SurD-I-4 to attract those producers in order to keep our power costs down and keep our lights on. This facility plays a pivotal role in providing for all our local energy needs and again I appreciate your consideration in allowing us to speak on behalf of Dominion.

Mr. Cameron: Okay, thank you very much, Mr. Small. We're going to hear from another government official, JoeAnn Newby, who's principal of the Surry County public schools, one of the principals, I guess, and then we're going to go to Mr. Richard Turner.

JoeAnn?

SurD-J Ms. Newby: Thank you. Good evening. I am JoeAnn Newby and I'm the principal of Surry
SurD-J-1 Elementary School right here in Surry, Virginia and tonight I come to thank the NRC and all the people at Virginia Power for their commitment to a safe environment here in Surry County and to note that there is a continued review of our environment and the status that it is here in Surry. This is important to us because the power plant is important to Surry, to Surry Elementary School. Through the years we have established a very positive working relationship with Dominion Power. It has significant meaning to me, both as a 29 and a half
SurD-J-2 year educator and as a lifelong citizen of the county. As an educator, my teachers and I are

appreciative of the following educational opportunities that are afforded to the children at Surry Elementary School. You've provided opportunities to explore the areas of math, science and technology in our fourth grade students. The students really enjoy going to the power station to study electricity and to be successful on those SOLs.

SurD-J-3 Also, revenues generated through Dominion Power enables the school system to implement programs such as after school tutoring, Saturday school and summer school and because of these programs and more programs that we implement, Surry Elementary has achieved next to the top state rating for school accreditation and is accredited through Southern Association of Schools and Colleges and receives state recognition for the National Blue Ribbon Schools Award. Some of our teachers have applied for the mini grant that has been offered by Dominion Power and we've been able to implement special programs.

We received the Virginia Business Education Partnership Grant and currently a representative
SurD-J-4 from Dominion Power serves on our advisory board. And as a citizen of Surry County, Dominion Power is significantly meaningful to taxpayers in that it provides tax revenues that allows citizens in Surry to enjoy a quality of lifestyle at a compatible real estate property tax rate
SurD-J-5 and at a personal property rate that is much lower than surrounding localities. The power plant has proven to be a responsible industry that not only provides energy for consumer use, but provides citizens of the county with employment opportunity.

SurD-J-6 In addition to providing job opportunities for Surry citizens, Dominion Power employees provide many hours of volunteer services for community projects such as our Special Olympics Program and our school carnivals and most recently at the 350th Anniversary Speakers Series.

You have been an asset to us and it's always good to know that safety is first and foremost because we like to have you around to continue the relationship that we enjoy.

Mr. Cameron: Thank you very much, Principal Newby.

Next we're going to go to Mr. Richard Turner who is the President of Isle of Wight Materials but has also been active in many economic development activities in the region.

SurD-K Mr. Turner: I'm going to be up front with you. I'm Richard Turner. I'm from Isle of Wight County. Patrick was the tall, dark and handsome version. I'm the short, fat, bald version. Patrick is the leader in economic development today. It wasn't on my résumé, but I served as Chairman of the Board of Supervisors for Isle of Wight County for seven years, served on the
SurD-K-1 Board for 14 years. And enjoyed a wonderful relationship with the good neighbors of Surry and their safety programs that we had with Surry nuclear plant and with the counties as good

neighbors working together. I might add that that's continued to be a good feeling, a warm fuzzy feeling that we have that type of relationship to work together for the betterment of all.

I'm a little bit concerned that I think I'm the only speaker that got instructions before I got here. It was 2 minutes instead of 7, I have to wear socks and I must talk and I must not sing. I don't think anybody else, I checked with them, and they didn't have those problems involved, but any how we could use a little singing, really.

(Laughter.)

I guess I want to ask a question instead of you asking the question, where would Surry County
SurD-K-2 be? I can say that because I'm not from Surry, but where would Surry County Schools be, where would the local government be without the support and help in the past as well as in the future, where would Hampton Roads and the economy of the State of Virginia be without these nuclear power plants supplying good, economical power for our businesses here?

Now the question may be asked why do we need another 20 years? Twenty years is a long time. Well, there were some times earlier in my life I thought the same thing. When I was 30 my Dad was 60 and I wanted him to get on the front porch and get in the chair and get out of the way because I figured he was an old man. I'm 60 years old today and I'm not ready to get in the rocking chair. But the point I want to bring out is that 30 years has gone by so fast you can't believe it. So 20 years or 40 years gives not only the Tidewater and the economy of Virginia, but also Virginia Power the basis for planning for the future and to work the best plan so better to serve you and I.

Now, the most important thing, I think that comes from all of this besides the economic part is
SurD-K-4 the people. Surry Nuclear Power Plant has some wonderful community leaders, not only Surry but Virginia Power as a whole, some wonderful community leaders that serve in local government, serve in all kinds of United Way and cancer drives and other things that they are leaders in that lead us and make this area a better place. That's what we all want.

I want to see when I get up in the morning three things. I need to make a new friend, help somebody's day to be a little brighter and learn something new. If you can't do one of those three things, stay home, get out of the way. But I draw that analogy to Surry Nuclear Power
SurD-K-5 Plant because they are that in the community. They learn as you well have heard tonight of all the regulations and things that they've done prior to these people getting here. They help people from their staff every time there's a need in the community or a need in the Tidewater area. And they've made a new friend. Years ago, Max and I served in the United Way
SurD-K-6 together. He's here tonight. He's a great leader too. So I thank you for being here. I certainly,

as you well know, speak in favor of the consideration of this and hope that it serves the community well. Thank you and God bless.

Mr. Cameron: Thank you very much, Mr. Turner.

We're going to ask two of the officials from Dominion Virginia Power to talk to us a little bit now about their vision behind the license renewal application and first of all we're going to go to Mr. Toby Sowers who is the Plant Manager for the Surry Nuclear Station and then Mr. Sowers is going to introduce us to Dr. Jud White who is the Manager of Environmental Policy and Compliance.

Toby?

SurD-L Mr. Sowers: Thank you very much, Chip. Good evening. I am Toby Sowers. I'm the Director of Ops and Maintenance which is the Plant Manager at Surry Power Station. I'd like to thank the Commission for holding this meeting and I feel blessed to have the opportunity and honor to represent the station and the employees at the station.

I also want to take a minute to thank our guest speakers from the local community, I mean, for such gracious comments. I sat there this afternoon and I marked up my discussion because a lot of what I said, I didn't want to be repetitive and I had that typed so I could send it to you as a formal statement. I sat there and I was marking it up again because they hit on a bunch of different topics.

SurD-L-1 I'll try not to be repetitive here, but there are some good things I want to say. I take great pride
SurD-L-2 in our station. I'm excited about license renewal. I've been in this business since I was 18. I started in the Nuclear Navy and I believe this is a very viable and legitimate alternative that we
SurD-L-3 have far under-utilized in nuclear power. And it's wonderful for the community. It's wonderful to
SurD-L-4 the consumer because we're a low cost producer, but it's wonderful for me and 850 other employees at the station. It's a livelihood over there and it's no small task to protect the health and safety and welfare of the public and we take it very seriously.

SurD-L-6 Renewed licenses will provide assurance that the local economy will continue to reap the benefit of having the large employer in the area and the tax benefits associated with that.

I'll take a moment just to tell you a little bit about myself and my association with Surry and the reason I do so is because I am merely a member of that leadership team that runs that station and my background is not atypical of the rest of the leadership team. I began my career in 1967, as I said with a 6-year enlistment in the United States Navy and I operated submarine reactors there. I trained for three years and was an operator for three years. I later worked for

Stone & Webster Engineering Corporation out of Boston. They were the architect/engineer, the designer/constructor of the Surry plants in the late 1960s and early 1970s. I started working for them in 1973 as an associate engineer while I finished my undergraduate engineering work and obtained my professional engineer's license, which I later tested for and obtained in Virginia. After I got my degree I decided I wanted some field experience and I transferred to Surry in 1977, late 1977, early 1978 and worked as a consultant engineer for Stone & Webster consulting for Virginia Power in the engineering area and I hired on with the company, Dominion, in 1983. And I ran their various engineering departments on-site from 1983 well into the 1990s. In the 1990s I obtained my certification for a senior reactor operator license and in 1999 I became the Director of the station's Nuclear Safety and Licensing. And then in the year 2000 I was promoted to the Director of Operations and Maintenance, the Plant Manager.

SurD-L-8 Surry has got a long history of safe and efficient operations. We're known as low cost producers. We're always ranked within the top five for nuclear fuel costs in the country and have been so for the past 12 years. We've achieved the highest levels of safety rating from the Nuclear Regulatory Commission and from the Institute for Nuclear Power Operations, INPO.

SurD-L-11 Additionally, every one of our training programs has and continues to be fully accredited. Our commitment to environmental stewardship dates back to the construction days of the 1960s and 1970s when we implemented many revolutionary design features at the station to maintain the environment and the intake and discharge canal you saw in the picture is one of a kind in this country. The discharge is upriver to protect the oyster beds, the game preserves and the feeding of the birds.

SurD-L-12 We believe our proximity to Hog Island Wildlife Preserve fits hand and glove with our efforts to maintain operations that have minimal impact on the local environment. We feel blessed to have bald eagles and ospreys soaring over our plant and nesting in our facility. We treasure the beauty of the pelicans and egrets and the osprey, the herons that perch on the banks of our intake and discharge canal. I walk it almost every day and it's just a warm feeling to see that part of wildlife next to a major industrial facility.

As you approach our plant entrance, you'll notice the signs. We call them goals. They're stakes in the ground. They're large signs right on the side of the road and they identify all of our goals. One of these goals is to have no environmental violations. It's a repeat goal from 2001 and 2002, which were successful. We don't put oil or chemicals on the ground or in the waterways. If we have a piece of equipment that leaks, or if we have a chemical spill, we have procedures in place to immediately clean it up. We identify it in our corrective action program and we determine why, how and what exactly happened and what we'll do to prevent any recurrence.

One of the things we took a close look at when we considered whether to apply for the Surry license was the cost of replacing the plant. We generate 1600 megawatts of power. That's enough to light 400,000 homes. I think it was referred to, 15 percent of the total power used in Virginia. That's for the past 30 years.

SurD-L-14 The station was relatively inexpensive to build, costing only $400 million. When you consider
SurD-L-15 the cost of replacement power for base level electric generating units that is a real bargain. In the future, more electricity, not less, will be needed and we will have to build additional plants. We believe that relicensing this station, though, is the best option for meeting the future electricity needs of this area and Virginia.

Finally again, I'd like to thank both state and local officials that we maintain such a close
SurD-L-16 relationship to. We try to be the best corporate citizen we can. It's also one of our goals. It's part of our Dominion equation. You've heard several mentions of what we did. We also lead southeastern Virginia in blood donations. We have blood drives every two months. There's a critical need for blood, especially at this time. Our Adopt-A-Highway work, the holiday baskets
SurD-L-18 for the needy, we're a leading contributor from the state, of course, for United Way, and the Scouting programs and many other community activities that we sponsor.

We consider our community partnership an important part of our equation and environmental stewardship, that's a core component of that partnership.

I appreciate the honor to represent the station here tonight and I'd like to introduce Dr. Jud White, he's our manager of Environmental Policy and Compliance and he'll talk about the environmental specifics of our submittal.

Thank you.

SurD-M Dr. White: Thank you, Toby. I appreciate that. Good evening, everyone.

My name is Jud White and I'm the environmental manager at Dominion with responsibilities for various compliance activities at all of our generating facilities including the Surry Power Station. I have about 27 years experience with Dominion and I hold degrees in biology, a master's degree in biology and a Ph.D. degree in environmental policy. I have to say in all sincereness that I am very proud of Dominion's record over the years with environmental performance and excellence and since I've been employed with them I don't mind saying so.

I was directly involved and assisted the Dominion nuclear team that prepared the license renewal application for Surry Power Station and in particular, I helped in the development of the

environmental report we submitted to them and helped coordinate with a variety of Federal and state agencies that we worked with.

We commend the NRC in developing a high quality and professional draft supplemental environmental impact statement associated with this license renewal process for Surry. This statement is a thorough and accurate scientific assessment of the potential environmental impacts associated with the proposed action. We agree and support the conclusions 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. Basically, this means that for Dominion the license renewal option is preserved or acceptable for Surry Power Station to provide safe and clean electricity to the Commonwealth of Virginia in order to meet future energy demands that the company needs to meet.

Dominion prepared over a several year period, and submitted, an extensive environmental report to the NRC for this license renewal process and this was only part of the information that was used by NRC to develop this SEIS in its recommendation. In other words, NRC didn't just rely on our work. They independently validated our conclusions through use of additional resources such as the generic environmental impact statement mentioned earlier, extensive consultation with Federal, state and local environmental authorities, independent review by the NRC's expert staff as well as National Laboratory consultants that are here with us tonight.

In addition, and more importantly, they also considered public comments that were provided during the scoping process that was held last September. Of particular note, relative to information sources, we engaged in discussions and meetings with key state and Federal environmental agency staff very early in the license renewal process to help ensure that all issues were identified and appropriately addressed in the environmental report that we submitted to NRC. Dominion also communicated with environmental and other pertinent stakeholders about license renewal. All of this activity, doing a lot of up front work helped considerably in the development of a thorough and accurate report.

Potential environmental impacts in the report are discussed with various aquatic resources as well as threatened and endangered species that have been discussed earlier. Studies at Surry began in 1969, even before the station was operational. The station's cooling water system which was mentioned earlier has a unique design in that its location, tidal transition zone, the NRC has concluded that potential impacts to aquatic resources from operations are small and that additional mitigation is not warranted.

The NRC also has preliminarily determined that the continued operation of the 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 as noted earlier, for many years.

With respect to historic resources which is important, Dominion has coordinated closely with Virginia historic resources during the license renewal process and we authorized a professional consultant to perform a resource assessment of the station site. The Department of Historic Resources concluded that there were no recorded historic districts, structures or archeological sites located within the facility. It was also determined that continued operation of the power station would have a beneficial protective effect on any potential undiscovered historical resources located on undisturbed portions of the site and this was because of limiting future access to the property and protecting the natural landscape.

To assist the NRC staff in evaluating the current applicability of the generic environmental impact statement, the information in it as pertains to generic issues, Dominion developed an internal procedure and protocol to identify any new and significant information relative to those issues determined to be generic and determined whether there's any potential change to that determination. No information was identified that could change this conclusion and we feel that this activity that was done not only by NRC, but by Dominion is very important in all license renewal projects for verification of the findings in the GEIS.

SurD-M-6 Dominion also agrees with the NRC that the potential environmental effects 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
SurD-M-7 license renewal, a very important point. Nor are there any new or increased environmental
SurD-M-8 emissions as a result of this action. And the current measures to mitigate environmental impacts associated with operations were found to be adequate.

Overall, Dominion takes pride in its environmental performance and its positive relationships with regulatory agencies, environmental organizations, the general public and the community at large. All of this positive relationship building takes time to foster and develop as well as a major commitment by management of Dominion for 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 relationship.

Dominion believes its obligation to provide safe, reliable energy from nuclear power extends well beyond the license renewal milestone. Federal, state and local oversight will continue to test and challenge appropriately, just as it does today, our standard of environmental excellence and the conduct of our daily business.

We welcome all comments on the content of this supplemental environmental impact statement during the public comment period and we're looking forward to working constructively with the NRC staff.

Thank you.

Mr. Cameron: Okay, thank you, Jud and thank you, Toby. Do we have anybody else who wants to say anything tonight before we close?

As I mentioned earlier and as several of the NRC speakers had said, talk to them, get to know them after the meeting and I would just thank all of the speakers tonight who came out from the community to share their views with us and thank all of you for being here and with that, we're adjourned.

(Whereupon, at 8:18 p.m., the meeting was concluded.)

SurD-N

VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261
July 2, 2002

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

Serial No.: 02-284
LR/LTB R0
Docket Nos.: 50-280/281
License Nos.: DPR-32/37

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)
SURRY POWER STATION UNITS 1 AND 2
LICENSE RENEWAL APPLICATION
RESPONSE TO REQUEST FOR COMMENT ON THE DRAFT PLANT-SPECIFIC SUPPLEMENT 6 TO THE GENERIC ENVIRONMENTAL IMPACT STATEMENT

In a letter dated March 15, 2002, the NRC provided Virginia Electric and Power Company (Dominion) a draft supplement environmental impact statement (SEIS) regarding license renewal of Surry Power Station, Units 1 and 2. This draft SEIS is the draft plant-specific Supplement 6 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,

David A. Christian
Senior Vice President – Nuclear Operations and Chief Nuclear Officer

Attachment

Commitments made in this letter: None

SurD-N

Docket Nos. 50-280/281
Serial No.: 02-284
Attachment
Page 1 of 6

Attachment

License Renewal – Response to Request for Comment
Draft Plant-Specific Supplement 6 to the GEIS
Serial No. 02-084

Surry Power Station, Units 1 and 2

License Renewal Application

Virginia Electric and Power Company
(Dominion)

SurD-N

Section 1.5 Compliance and Consultations

SurD-N-1 Page 1-9, Line 7:

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.

Section 2.1.3 Cooling and Auxiliary Water Systems

SurD-N-2 Page 2-7, Lines 25-26:

Draft GEIS Statement:

The statement is made that, "After passing through the condensers, the cooling water enters into a 880-m (2900 ft) discharge tunnel and subsequently flows back into the James River." This implies that the water flows into the river directly from a 2900-foot long tunnel.

Dominion Comment:

The following statement is suggested as a replacement: "After passing through the condensers, the cooling water flows through a tunnel into the head of a 2900-foot discharge canal, and from the canal into the river."

Section 2.2.8.1 Housing

SurD-N-3 Page 2-27, Line 4:

Draft GEIS Statement:

*It is indicated that approximately **890** permanent employees work at Surry Units 1 and 2.*

SurD-N

Dominion Comment:

It is suggested that the statement reflect about **880** permanent employees as stated in the Environmental Report Page E-3.

Section 2.2.8.2 Public Services

SurD-N-4 Page 2-31, Lines 28-30:

Draft GEIS Statement:

It is stated that Interstate 95 runs in a north-south direction west of Surry County through the region and connects Richmond to Washington, D.C. to the north and Charlotte, North Carolina to the south.

Dominion Comment:

It is suggested that the following words be replaced for the Charlotte connection: "…and to Emporia, Virginia, leading into North Carolina, to the south."

Section 2.2.8.5 Demography

SurD-N-5/6 Page 2-36, Lines 19-21, Page 2-37, Line 12, and Page 2-49, Line 30:

Draft GEIS Statements:

1. *The statement is made, "Table 2-8 shows the actual and estimated changes in population…from 1980 to 2030." This could be interpreted as having actual USCB 2000 numbers, when in fact, they are estimates based on the 1990 census.*

2. *The Source for Table 2-8 is given as **VEPCo 2000c**, and is noted on Page 2-49, Line 30, as "Final Safety Analysis Reports".*

Dominion Comment:

1. It is recommended that the statement noting the population decrease for the century be a separate paragraph unto itself.

2. Contrary to the notation in the GEIS, the source for Table 2-8 is from the reference on Page 2-50, Lines 1-3, and is noted as **VEPCo 2001c**, which is from the Environmental Report, Page 2-30. It is recommended that the Table 2-8 Source be changed to **VEPCo 2001c**. It is also recommended that the Table 2-8 title add the words "…, Based on 1990 Census Data", to clarify the source of the information and

SurD-N

to likewise avoid the implication that the source is 2000 Census Data, noted on Page 2-36, Lines 21-22.

It is also recommended that the title of **VEPCo 2000c** on Page 2-49, Line 30, be changed to "**Updated** Final Safety Analysis Report", which is the complete title of the reference.

Section 4.1.2 Impingement of Fish and Shellfish

SurD-N-7

Page 4-13, Line 3:

Draft GEIS Statement:

It is stated, "…at the shoreline (western) end of the dredged intake ***canal****,…"*

Dominion Comment:

In the License Renewal Application Environmental Report submitted May 29, 2001, the "intake canal" refers to the canal constructed from the low-level intakes to the high-level intakes. The word "**channel**" refers to the dredged area of the James River that ends at the intake structure, which pumps water into the intake canal. It is suggested that the SEIS replace the word "**canal**" on Page 4-13, Line 3, with the word "**channel**", to be consistent with the usage on Page 2-7, Line 18.

Section 4.1.3 Heat Shock

SurD-N-8

Page 4-15, Lines 4- 5:

Draft GEIS Statement:

The statement, "The maximum temperature elevation of the water as a result of passing through the condensers….", is a description of a parameter that is not in the existing NPDES permit. The temperature (and conversion) given refers to a delta, and not an actual temperature measurement.

Dominion Comment:

It is recommended that the above statement be deleted, as the information is not pertinent to the NPDES permit, and not included in the Surry License Renewal Application Environmental Report. If the statement is retained, it is suggested that the temperature delta be given as 14°F, as provided in the Dominion resource, *Final Environmental Statement Surry Power Station, May 1972.*

SurD-N

Section 4.4.6 Environmental Justice

SurD-N-9 Page 4-34, Line 13, Page 4-36, Line 2:

Draft GEIS Statements:

The statement on Page 4-34 and title of Figure 4-2 on Page 4-36 indicate that the low-income population distribution is from Census 2000.

Dominion Comment:

It is Dominion's understanding that the distribution of low-income populations data was not available from Census 2000. The SEIS states on Page 4-26, Line 19, that income data was not available for the 2000 census, so data were used from Census 1990. It is recommended that the statement on Page 4-34, Line 13, and the title of Figure 4-2 on Page 4-36 be changed to attribute the distribution of low-income populations to Census 1990.

Section 5.2.2 Estimate of Risk for Surry Power Station

SurD-N-10 Page 5-6, Line 6, Page 5-9, Line 40, Page 5-26, Line 34:

Draft GEIS Statement:

On Page 5-6, an RAI is referred to for a VEPCo response on SBO contribution. On Page 5-9, an RAI is referred to for a VEPCo response on external events. On Page 5-26, an RAI is referred to for a NRC question on cost-benefit.

Dominion Comment:

It is suggested that the NRC specify the RAI numbers referred to in the text, in order to correlate the appropriate VEPCo responses.

Section 5.2.6.1 VEPCo Evaluation

SurD-N-11 **Page 5-25, Lines 29-30:**

Draft GEIS Statement:

On Page 5-25, it is written that "…a scaling factor of 0.94 was applied to…" Averted Onsite (Power Replacement) Costs (RPC) formulae.

Dominion Comment:

Dominion interprets this description to be incorrect. On Page 4-43 of the License Renewal Application Environmental Report, it states "…the replacement power formula could be reduced by a factor of 0.94, but the generic formula will be conservatively used." Our decision to not apply the 0.94 scaling factor was deliberate and results in conservative cost calculations.

SurD-O

8- 6-02; 3:28PM; :+102690832 # 2/ 5

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Custom House, Room 244
200 Chestnut Street
Philadelphia, Pennsylvania 19106-2904

IN REPLY REFER TO:

July 10, 2002

ER 02/341

Chief, Rules Review and Directives Branch
U.S. Nuclear Regulatory Commission
Mail Stop T6-D59
Washington, D.C. 21555-0001

Attention: Andrew Kugler

Re: *NUREG-1437, Draft Supplement 6 to the Generic Environmental Impact Statement Regarding Surry Power Station, Units 1 and 2*

Dear Sir:

The U.S. Department of the Interior has reviewed and offers the following comments on the referenced draft document.

General Comments

The Department shares a common goal with the U.S. Nuclear Regulatory Commission (NRC) to bring the Surry Nuclear Power Station into compliance with current environmental regulations. To this end, a representative of the U.S. Fish and Wildlife Service's (FWS) Chesapeake Bay Field Office staff visited the site on May 22, 2002, to help the NRC identify, assess, avoid and mitigate any adverse environmental impacts. With the advances in human understanding of ecological relationships, it is appropriate and useful that Federal and state natural resource agencies use the license renewal process to review site conditions in order to maintain the highest level of environmental protection. Since the Surry Power Station came online in 1972, the Dominion Energy Company (Parent Company of Virginia Electric and Power Company) and the NRC is to be commended for their progressive environmental stewardship of the natural resources around the Surry project area.

SurD-O-1

SurD-O-2

The FWS has determined that the Surry operations and minor refurbishment may have the potential to adversely affect natural resources in the area. The federally threatened bald eagle, *Haliaeetus leucocephalus*, may appear to be unaffected, but a scientific approach should be adopted to evaluate and document any population effects. Regarding aquatic species, the cooling water intake structures at the Power Station are nearly the state of the art.

The Department offers the following comments on topics where the environmental standards have improved and new information is available. We also seek additional review with respect to a Tuscarora Nation concern about aboriginal territory.

Specific Comments

SurD-O-3 The Dominion Energy Company has developed a cooling water intake that is effective at minimizing aquatic impacts. The traveling mesh screens are spray washed and the biota is removed from the screens and returned to the river. The traveling screen and wash system clearly minimize aquatic impacts. To further minimize the impacts, in the process of replacing worn or damaged screens, the screens should be replaced with mesh less than or equal to one millimeter wide, with entrance velocities less than or equal to 0.5 feet per second (Gowan, C. and G. Garman 1999).

Endangered Species Act

SurD-O-4 The FWS agrees that the potential exists for the Surry Power Station to adversely affect the bald eagle, a federally threatened species nesting and feeding in and around the power facility. The potential impacts were identified in Appendix E of the draft Application for Renewed Operating License (August 24, 2000) and Supplement 6 of the Generic Environmental Impact Statement for License Renewal of Nuclear Plants, April 2002. The potential for incidental mortality associated with the transmission lines is the primary concern.

A secondary concern is the effects of human activity associated with the Stations's operation and refurbishment. Possible evidence of past disturbance is the abandonment of a nest that for four years successfully produced young eagles. The location of the abandoned nest near the Spent Fuel Site suggests the possibility that human activities may have caused the eagles to abandon nesting. The effects of human activity on eagles during Station operations and refurbishment should be evaluated.

Therefore, a site specific Biological Assessment should be prepared to identify and evaluate any potential impacts to the bald eagle in accordance with Section 7 of the Endangered Species Act.

Historic and Cultural Resources

SurD-O-5 The Bureau of Indian Affairs (BIA) requests that the NRC consult with the Tuscarora Tribe regarding impacts to aboriginal territory. Please contact the following for consultation:

Chief Leo Henry	Richard Hill (for cultural and historic properties)
Tuscarora Nation Clerk	Haudenosaunee Standing Committee
2006 Mt. Hope Road	2235 Mt. Hope Road
Lewiston, NY 14092	Tuscarora Nation
Telephone: 716-622-7061	Lewiston, NY 14132
	Telephone: 716-297-7960

SurD-O

Neil Patterson, Jr., Director
Tuscarora Environmental Program
Tuscarora Nation
2045 Upper Mtn. Road
Sanborn, NY 14132
Telephone 716-628-5498

Summary Comments and Recommendations

The Department recommends that the NRC adopt the following recommendations in order to maintain optimum protection of natural and cultural resources at the Surry Nuclear Power Station:

Consult with representatives of the Tuscarora Tribe regarding impacts to aboriginal territory,

Require the intake screen replacements to have a mesh size of one millimeter or less wide with intake water velocities less than 0.5 feet per second, and

Complete a Biological Assessment to identify and evaluate potential impacts to the bald eagle at the Surry Nuclear Power Station during the current license renewal. To assist with the review of the bald eagle and other federally or state listed species, in addition to other migratory birds, Dominion Energy should solicit comments from the State of Virginia Department of Game and Inland Fisheries and Heritage programs. These letters from the State should become part of the environmental review and administrative record for this issue.

We appreciate the opportunity to review the draft environmental document and provide comment on natural and cultural resource protection. If you have any questions regarding the FWS comments, please contact David W. Sutherland of the Service's Chesapeake Bay Field Office by telephone at (410) 573-4535, or by e-mail at David_Sutherland@fws.gov. For any further consultation with the Bureau of Indian Affairs, please contact Jim Kardatzke, Eastern Regional Office, at telephone number (615) 467-1675.

Sincerely,

Michael T. Chezik
Regional Environmental Officer

SurD-O cc:
Dominion Energy Company (Tony Banks)
5000 Dominion Boulevard
Glen Allen, VA 23060

L. Henry, Tuscarora Nation, Lewiston, NY
R. Hill, Tuscarora Nation, Lewiston, NY
N. Patterson, Sanborn, NY

Reference

Gowan, C. and G. Garman. 1999. Design criteria for fish screens in Virginia: Recommendations based on a review of the literature. *Prepared for*: Virginia Department of Game and Inland Fisheries, Richmond, VA.

SurD-D

SURRY POWER STATION LICENSE RENEWAL COMMENTS
TO THE U.S. NUCLEAR REGULATORY COMMISSION
MAY 29, 2002

GOOD AFTERNOON,

THANK YOU FOR THE OPPORTUNITY TO ADDRESS YOU TODAY IN SUPPORT OF THE SURRY POWER STATION'S LICENSE RENEWAL. MY NAME IS LAVERNE DANIELS AND I AM SUPERINTENDENT OF SURRY COUNTY PUBLIC SCHOOLS.

SurD-D-1

DURING MY FOUR-YEAR TENURE HERE, WHEN THE TOPIC OF LICENSE RENEWAL HAS COME UP I'VE OFTEN ASKED CITIZENS, "WHAT WOULD IT BE LIKE IF THE POWER PLANT WERE NOT HERE?" THEY ALWAYS SHAKE THEIR HEADS AND SAY, "YOU DON'T WANT TO KNOW AND WE DON'T EVEN WANT TO THINK ABOUT IT. WE DON'T WANT TO GO BACK TO THE WAY WE WERE BEFORE THE POWER PLANT WAS BUILT."

TO PREPARE MY COMMENTS FOR YOU TODAY I ASKED MY OFFICE STAFF TO RESPOND TO THE TOPIC "WHAT THE DOMINION POWER PLANT IN SURRY MEANS TO ME." THREE MAJOR THEMES EMERGED FROM THEIR

SurD-D

COMMENTS: COUNTY REVENUE, HOUSEHOLD INCOME, AND CORPORATE CITIZENSHIP.

Sur-D-D-2 THE SIGNIFICANT AMOUNT OF MONEY IN PROPERTY TAXES PAID BY DOMINION PROVIDE A GREAT SOURCE OF ASSURANCE THAT THE COUNTY WILL BE ABLE TO MEET THE NEEDS OF THE COMMUNITY.

OUR SCHOOLS HAVE BEEN REVITALIZED BECAUSE OF OUR NUMBER

SurD-D-3 ONE SOURCE OF TAX REVENUE -- THE POWER PLANT. WE NOW HAVE MODERN, UP-TO-DATE SCHOOLS OF WHICH EVERYONE CAN BE PROUD. BECAUSE OF THE POWER PLANT OUR CHILDREN HAVE THE LEARNING ENVIRONMENT THEY DESERVE.

SurD-D-4 THE POWER STATION PROVIDES EMPLOYMENT OPPORTUNITIES, THEREBY GIVING HOUSEHOLD INCOME TO MANY RESIDENTS OF THE COUNTY WHO, IN TURN, CONTRIBUTE TO THE LOCAL ECONOMY.

SurD-D-5 THE POWER STATION'S LOCAL INVOLVEMENT IS AN EXAMPLE OF THEIR GOOD CORPORATE CITIZENSHIP. MANY COUNTY ORGANIZATIONS

SurD-D

AND CHARITIES HAVE RECEIVED MONETARY SUPPORT FROM THE POWER STATION AND VOLUNTEER SUPPORT FROM PLANT EMPLOYEES. MY STAFF AND I RECENTLY WORKED WITH DOMINION'S CORPORATE SERVICES STAFF AND RECEIVED A GENEROUS CHECK TO PURCHASE A MATH/SCIENCE COMPUTER LAB AND TO PURCHASE ADDITIONAL COMPUTERS FOR THE SCIENCE DEPARTMENT AT OUR HIGH SCHOOL. WE ARE NOW WORKING TOWARD GETTING SOME OF OUR STUDENTS INTO

SurD-D-6

THE NUCLEAR OPERATORS TRAINING PROGRAM. THE POWER STATION IS AN OUTSTANDING EDUCATIONAL PARTNER.

SurD-D-7

WE KNOW THAT THE POWER PLANT HAS AN EXCELLENT SAFETY RECORD. THEREFORE, THE CITIZENS AREN'T WORRIED ABOUT THE EFFECTS OF **HAVING** THE NUCLEAR POWER PLANT; THEY'RE WORRIED ABOUT THE EFFECTS OF **NOT HAVING** THE NUCLEAR POWER PLANT.

M. LaVerne Daniels, Ph.D.
Superintendent
Surry County Public Schools

SurD-F

Toby Sowers
Director, Operations and Maintenance-Surry Power Station
NRC Public Meeting
Surry Power Station License renewal
May 29, 2002

SurD-F

Good evening. My name is Toby Sowers – the Director of Operations and Maintenance at Surry Power Station. I would like to thank the Nuclear Regulatory Commission for holding this important meeting to receive public comment on the NRC's Supplemental Environmental Impact Statement related to Dominion's license renewal application for Surry Power Station. I'm honored to represent the Station, as I believe that we at Dominion, Surry County and other local communities all have a stake in the future of Surry Power Station.

SurD-F-1

As an employee of Dominion, I am excited about license renewal. A

SurD-F-2

renewed license is not only important for Surry County and Virginia, but also for more than 850 other fulltime Surry employees whose livelihood depends on providing safe and reliable electricity to customers in this state – not to mention future employees that will be required to continue safe operation of the station well into this century. Surry Power Station generates about 15 percent of the power

SurD-F-3

used in Virginia and has done so for the past 30 years. A renewed license will provide assurance that the local economy will continue to reap the benefit of having a large employer in the area and that Surry County will continue to receive tax revenue from the Station's operations.

SurD-F

I'd like to take a moment to tell you a little about myself, and my association with Surry Power Station. My background is fairly typical of many of the members of our site leadership team. I began my career in 1967 with a 6-year enlistment in the US Navy as a nuclear submarine operator. I later worked for Stone & Webster Engineering as an associate engineer, providing design and operational engineering support to several operating nuclear plants, including Surry. I completed my degree in Engineering and obtained my Professional Engineer license in the state of Virginia, while working for Stone and Webster. I moved to Surry in 1978 as a construction engineer for Stone and Webster and joined Dominion in 1983 as the site design engineering supervisor. I obtained my commercial senior reactor operator certification during my tenure as site engineering manager. In 1999 I became Director of Station Safety and Licensing, and 2000, was promoted to Plant Manager.

SurD-F-6

Surry has a long history of safe and efficient operation. We're consistently ranked among the most efficient producers of nuclear-generated electricity in the United States. The station also has achieved high levels of performance in nuclear safety and plant security as measured by the Nuclear Regulatory Commission.

SurD-F The Nuclear Regulator Commission – in its Systematic Assessment of Licensee Performance during the period spanning 1992-1998 gave the Station high marks for safety, with an average score of 1.2, which is defined as having superior safety performance in all station functional areas. Under the NRC's revised oversight process, Surry continues to fully meet all NRC safety cornerstone objectives. The Institute of Nuclear Power Operations, also, has consistently given Surry high marks for nuclear safety and operational performance in addition to fully accrediting all of our training programs.

Our commitment to environmental stewardship dates back to the

SurD-F-7 construction days of 1960s and1970s. We believe our proximity to the Hog Island wildlife preserve fits hand-in-glove with efforts to maintain operations that have a minimal impact on the local environment. We feel blessed to have bald eagles and ospreys nesting and soaring over our property. We treasure the beauty of the pelicans, egrets and herons that perch on the banks of our intake and discharge canals. As you approach the plant entrance you'll see our Station Goals posted on

SurD-F-8 roadside signs. One of those goals is to have no environmental violations (a repeat of the successful 2001 goal).

SurD-F We don't put oil or other contaminants into the ground or waterways. If we have a piece of equipment leak oil we have a spill prevention and cleanup procedure we invoke and we document the leak in our Corrective Action System where we track what, how, and why it happened and what we will do to prevent reoccurrence.

One of the things that we took a look at when we considered whether to apply to renew Surry's license was the cost of replacing the plant. Surry generates more than 1,600 megawatts of electricity, or enough power to light up about
SurD-F-9 400,000 homes. The station was relatively inexpensive to build, costing about $400 million. When you consider the cost of building new baseload electric
SurD-F-10 generating units in today's economy, that's a bargain. In the future, more electricity, not less, will be required to meet growing customer demand. Because of Surry's low production costs, overall safety performance and minimal impact on the environment, we believe that re-licensing the station is the best option for meeting the future electricity needs of Virginians.

Finally, I would like to thank those of you from the State and Local governments on behalf of Dominion for allowing us to do business in Surry
SurD-F-11 County. We strive to be a good corporate citizen and have enjoyed the

SurD-F professional, supportive working relationship we have with the State and Local officials. Dominion has a long-standing tradition of investing in the communities we serve through volunteer and philanthropic activities. Our employees demonstrate their commitment to their community by participating in Adopt-a-Highway programs, Holiday baskets for the needy, contributing to the United Way, Blood Drives, supporting area scouting programs and many other community activities. We consider community partnership as an important component of the Dominion equation and environmental stewardship as a core component of that partnership.

I appreciate the opportunity to talk about our license renewal plan and would now like to introduce Dr. Jud White, our Manager of Environmental Policy and Compliance, to talk about the environmental specifics of our operations.

Thank you.

SurD-G

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

SurD-G-1

- 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.

SurD-G

- 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.

SurD-G-4

- 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 <u>small</u> 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

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SurD-G 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.

SurD-G-5
- 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. <u>This activity is considered very important in all license renewal projects for verification of the findings in the Generic Environmental Impact Statement.</u>

SurD-G-6
- 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.

SurD-G-7

SurD-G-8

- 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

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SurD-G

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.

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