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Chief
Rules Review and Directives Branch
U.S. Nuclear Regulatory Commission
Mail Stop T6-D59
Washington, DC 20555-0001

11/01/02
61FR 6667H
(6)

**RE: EPA Review and Comments on
Draft Generic Supplemental Environmental Impact Statement (DGSEIS)
License Renewal of Nuclear Plants, Supplement 11
Regarding St. Lucie Units 1 & 2
CEQ No. 020443**

Dear Chief:

Thank you for submitting the above-referenced document. EPA Region 4 reviewed the Draft Generic Supplemental EIS (DGSEIS) pursuant to Section 309 of the Clean Air Act and Section 102 (2)(C) of the National Environmental Policy Act (NEPA). The purpose of this letter is to provide the Nuclear Regulatory Commission (NRC) with EPA's comments regarding potential impacts of the proposed renewal of the St. Lucie Units 1 & 2 Operating Licenses (OLs).

Florida Power and Light Company (FPL) submitted an application to renew the Operating Licenses (OLs) for St. Lucie Units 1 & 2 for an additional 20 years. St. Lucie is a nuclear powered, electric generating facility that has process water discharges regulated by the National Pollutant Discharge Elimination System (NPDES) program. The renewal of the OLs would allow for power generation capability beyond the current term, providing for future system generating needs.

The proposed action would include use and continued maintenance of existing facilities and transmission lines, and would not result in new construction or disturbance. According to the information in the DGSEIS, the consequences of renewing the OLs would result in fewer environmental impacts than the consequences of alternative methods of power generation.

The plant uses once-through cooling water from the Atlantic Ocean to remove waste heat from the facility. Ocean water is drawn through three offshore intake structures into an intake canal that leads to the plant. The heated water is discharged back to the Atlantic Ocean through offshore diffusers. The Atlantic Ocean in the vicinity of the plant is considered part of the aquatic environment of interest.

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Based on review of the subject Generic DGSEIS, a rating of EC-1 has been assigned to this proposed action. That is, there are environmental concerns on some aspects of the proposed project. While we recognize that continued use and maintenance of the existing facility would result in fewer impacts than the feasible alternatives for generating fuel, we have environmental concerns about some impacts associated with the facility.

Specifically, clarification is needed regarding impact avoidance and mitigation measures for the Big Mud Creek ecosystem, and herbicides used in the transmission right-of-way. Consultations with the appropriate agencies regarding threatened and endangered species will need to continue throughout the operating life of the facility, in order to avoid and mitigate impacts.

Thank you for the opportunity to comment on this document. We look forward to reviewing the Final Generic SEIS. If we can be of further assistance, please contact Ramona McConney of my staff at (404) 562-9615.

Sincerely,

A handwritten signature in cursive script, appearing to read "H. Mueller".

Heinz J. Mueller, Chief
Office of Environmental Assessment

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

Alternatives:

As described in the DGSEIS, the environmental impacts of continuing or renewing the license for St. Lucie Units 1 and 2 has fewer environmental impacts than the alternatives (Chapter 8 and Table 9-1). The alternatives described in the document include using fossil fuel power generation processes, constructing a new nuclear facility, using alternative fuel generation methods, purchasing power from other sources, or implementing the No-Action Alternative.

EPA appreciates the utility-sponsored conservation methods outlined in Section 8.2.5.11 to help users implement measures to reduce power consumption.

Threatened and Endangered Species:

We note that federally-protected species are listed for the area by the U.S. Fish and Wildlife Service (FWS). EPA principally defers to the FWS regarding endangered species assessments and encourages NPS to continue coordination with the FWS as appropriate.

A March 6, 2002 letter on page E-8 of the document states that the Florida Fish and Wildlife Conservation Commission (FWC) planned to review Big Mud Creek to determine whether additional manatee protection measures were warranted. FWC stated that they wanted to formalize a protocol with Florida Power & Light Company for the capture and recovery of manatees entrained in the power plant's intake canal. The DGSEIS discusses past incidents when manatees entered the intake canal on infrequent occasions and were rescued. As a follow-up to this issue, the Final GSEIS should include updated information regarding measures to protect the manatee in the vicinity of St. Lucie, and the outcome of any pertinent studies regarding Big Mud Creek.

The document discusses the presence of protected sea turtles in the area, and your coordination with the National Marine Fisheries Service regarding incidental take. We note the Incidental Take Statement (ITS), which contained mandatory terms and conditions to minimize the effects of this take. The measures taken to avoid and mitigate sea turtle entrapment in the intake canal were discussed in the DGSEIS.

Due to the presence of threatened and endangered species in the area, consultations with the appropriate agencies will need to continue throughout the operating life of the facility, in order to avoid and mitigate impacts.

Fish:

We note the concerns regarding anoxic conditions at the bottom of Big Mud Creek, where the water depth exceeds 40 feet. Fish kills have been reported in that area, and the Florida Department of Environmental Protection recommended that the creek be filled to a more environmentally-friendly depth (page E-8 of the document).

Clarification should be provided in the Final GSEIS regarding the origin of the anoxic conditions mentioned, and the planned or implemented measures to avoid impacts to fish in the area.

Herbicides:

According to Page 2-15, Power Transmission System, herbicides are used in the transmission right-of-way. The Final GSEIS should specify the types and quantities of herbicides applied, and the alternatives to spraying plants with defoliant. Similarly, the FGSEIS should include details regarding broadcast applications for weed control (types, frequency, quantities, alternatives to chemical applications, etc.).

Applying herbicides and weed killers can impact surface and groundwater resources. This is of concern at this site, since groundwater is generally very shallow there. Applications of herbicides in and around residential areas could potentially impact sensitive populations. In addition, some herbicides may also cause potential adverse impacts to wildlife.

Water Quality:

Section 2.2.3 briefly discusses the NPDES status of the facility. Requirements for the National Pollutant Discharge Elimination System (NPDES) and Industrial Wastewater Facility permits should be outlined in the Final GSEIS.