A.6 Letters and E-Mails Received on the Draft SEIS

Doris Mendiola - [Fwd: Fwd: NY TIMES--Regulators kept damaged A-Plant Open Because of Cost To Owner] Page 1

SLD-AA

From: Betty Lou Wells <blouwells@earthlink.net>
To: Bill Nelson <senator@billnelson.senate.gov>, Bob Graham <"bob graham"@graham.senate.gov>, Mark Foley <mark.foley@mail.house.gov>, Lisa Kaul <lkaul@envector.com>, Jim Reeder <jreeder@pbpost.com>, Anthony Westbury <anthony.westbury@scripps.com>, Michael Goforth <tribedit@fptribune.com>, Richard Wells <rwells78@comcast.net>, Bob Bangert <Bangert@digital.net>, Sharon Beal <" sbeal9999"@bellsouth.net>, Ellen Mancini <ellen_mancini@hotmail.com>, Jeb Bush <jeb@jeb.org>, Masnick <StLucieDSEIS@nrc.gov>, Lace Vitunac <waltnlacev@aol.com>
Date: 1/4/03 12:02PM
Subject: [Fwd: Fwd: NY TIMES--Regulators kept damaged A-Plant Open Because of Cost To Owner]

Oh my God!

SLD-AA-1

This is the reason to carefully, double carefully consider extending operating licenses of St. Lucie 1 and 2 (and all other plants) as we shall undoubedly continue to find problems of rust, embrittlement, etc. in old plants. Wonder what the industry thinks stories and occurences/events of this sort do to "public confidence"?

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11/01/02
67FR66674
(1)

E-RIDS = ADM-03
Add = M. Masnik (MTH2)

Template = ADM-013

From: <Waltnlacev@aol.com>
To: <blouwells@earthlink.net>
Date: 1/4/03 11:05AM
Subject: Fwd: NY TIMES--Regulators kept damaged A-Plant Open Because of Cost To Owner

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03 JAN 13 AM 9:46
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From: Lloyd Brumfield <lloydb4@yahoo.com>
To: Lloyd Brumfield <lloydb4@yahoo.com>
Date: 1/4/03 5:19AM
Subject: NY TIMES--Regulators kept damaged A-Plant Open Because of Cost To Owner

Regulators' Wariness Kept a Damaged A-Plant Open
By MATTHEW L. WALD

ASHINGTON, Jan. 3 — Three months before workers refueling an Ohio nuclear reactor discovered last year that its lid had rusted nearly all the way through, the staff of the Nuclear Regulatory Commission drafted an order to close it for inspection.

But the order was never issued, because the staff doubted its authority to close the plant, did not want to impose unnecessary costs on the owner and was reluctant to give the industry a black eye, according to an internal commission report released today.

The report, by the commission's inspector general, concluded that the staff had been too hesitant and that a policy adopted by the N.R.C. in the mid-1990's to take costs into account when setting regulatory requirements was in conflict with the commission's goal of maintaining reasonable assurance of public safety.

But the basic problem, the report said, was the staff's assumption about who had the burden of proof — the commission or a plant's operator — when safety was in question.

The commission "appears to have informally established an unreasonably high burden of requiring" of itself "absolute proof of a safety problem, versus lack of reasonable assurance of maintaining public health and safety," said the inspector general, Hubert T. Bell.

The report, dated Dec. 30, was issued today after an account about it appeared this morning in the Cleveland daily The Plain Dealer. Its sharp criticism of the commission's staff concerned the belated nature of the shutdown of the Davis-Besse reactor, near Toledo, last year.

Other reactors of the same design had been found to have cracks in parts attached to the lid, and the commission wanted all such plants inspected by Dec. 31, 2001. The operators of the Davis-Besse plant wanted to wait until March 2002, when the reactor was scheduled to be shut anyway for refueling.

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When the plant finally closed, on a compromise date in February 2002, engineers and workers were shocked to find that cracks of the kind the commission staff had suspected there had let acidic water leak onto the head, where it had eaten away a 70-pound chunk of steel six inches thick.

Only a layer of stainless steel about a quarter-inch thick had prevented the cooling water from spewing out of the vessel head, in a leak that could have proved catastrophic. The corrosion was the most extensive ever found at an American nuclear plant.

Three months earlier, in November 2001, the commission's staff had drafted a shutdown order. But some staff members were not sure they had the authority to issue it, the inspector general's report found. Others thought that it might not be defensible in court, and that such an order would "destabilize confidence" in the industry.

William M. Beecher, director of the commission's public affairs office, said the N.R.C. received the report on Thursday and had not yet determined how it would respond. But, he said, "the N.R.C. has the unquestionable and unquestioned authority to shut down a plant if it concludes that public health and safety is potentially in jeopardy."

Such shutdown orders were common in the 1970's and 1980's, when reactors were newer and operating problems were first occurring. They are rarer now. In the mid-1990's, the commission adopted a policy called "risk-informed regulation," in which it pays more careful attention to the costs it imposes on plant operators, comparing those costs with the amount of risk reduction they provide.

But Mr. Beecher said that while the commission and its staff do take costs into account, "the primary and overarching requirement, concern, standard, for the N.R.C. is public health and safety."

"Anything else," he said, "is secondary or tertiary."

As for the concern about having to defend such an order in court, the new report determined that the fear of a lawsuit had been unfounded. The president of the FirstEnergy Nuclear Operating Company, which runs Davis-Besse, told the inspector general that no formal shutdown order would have been required; he would have closed the plant had the commission simply telephoned and asked him to do so, he said.

The inspector general undertook his investigation at the request of the Union of Concerned Scientists, a

safety group that is generally highly critical of nuclear operations.

David Lochbaum, a nuclear engineer with the group, said in an interview that shutting down early for a special inspection would not have been an undue burden on Davis-Besse. Other reactors suspected of cracks in the lids did just that, Mr. Lochbaum said.

World Business Briefing I Asia: Japan: Power Plant Shut (October 29, 2002)

Campaigning About A-Plants, But Without Actual Power (August 21, 2002) $

Fuel Rods and Brass Tacks; Reality Overtakes Rhetoric in Nuclear Power Debate (May 26, 2002) $

Report Faults Fiscal Review of Nuclear Plants (December 25, 2001)

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Doris Mendiola - NUREG-1437, Supplemental 11 ['Watchdog': Virus checked] Page 1

SLD-AB

From: <Gregory_Hogue@ios.doi.gov>
To: <StLucieDSEIS@nrc.gov>
Date: 1/6/03 9:13AM
Subject: NUREG-1437, Supplemental 11 ['Watchdog': Virus checked]

Attached for your consideration are comments to the subject DEIS.

Gregory Hogue
Regional Environmental Officer
404-331-4524

11/01/02
67FR66674
(2)

(See attached file: nureg1437.wpd)

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03 JAN 13 AM 9:47
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Template = ADM-013

E-RIDS = ADM-03
Add = M. Masnik (MTM2)

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ER 02/1011

January 6, 2003

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

RE: NUREG-1437, Supplement 11, Generic Environmental Impact Statement for License Renewal of Nuclear Plants

SLD-AB-1

The Department of the Interior has reviewed the referenced document. We have no comments to provide for your consideration. If you should have any questions, I can be reached at 404-331-4524.

Sincerely,

Gregory Hogue
Regional Environmental Officer

cc:
OEPC, WASO
FWS, R4

SLD-AC

From: Betty Lou Wells <blouwells@earthlink.net>
To: <StLucieDSEIS@nrc.gov>, Bob Graham <"bob graham"@graham.senate.gov>, Jim Reeder <jreeder@pbpost.com>, Judy James <jjhacienda@aol.com>, Marti Reno-Curtis <renocurtis@aol.com>
Date: 1/10/03 11:22PM
Subject: Comment I

11/01/02
67 FR 66674
(3)

Below is copy of comments made December 3, 2002 in Port St. Lucie at the public hearing before the NRC. I was not answered at the conclusion of my remarks but was told someone would answer at the end of the meeting.

My name is Betty Lou Wells. I reside at 1124 Jasmine Avenue in Ft. Pierce,
St. Lucie County, Florida 34982.

Over thirty years ago, I was a member of three community organizations which attended NRC public hearings on FP&Lís request to build a nuclear power plant now known as St. Lucie 1 and followed by St. Lucie 2. The three organizations were the League of Women Voters

of St. Lucie County, the Conservation Alliance of St. Lucie County, and C.U.R.E.

As a result of gathering and studying handouts presented at those first hearings, members of the League requested and received additional information from NRC, FP&L, and national organizations devoted to studying nuclear power. These materials were shared with the Conservation Alliance and a new group of Martin and St. Lucie County residents called Citizens United Against a Radioactive Environment, or
C.U.R.E.

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Today facts relevant to an extension of St.Lucie 1 and 2ís license from 40 to 60 years logically focus on new information . However, there are questions from those first hearings that I think need to be revisited. Please overlook or point out any misuse of terms. Ií've been out of this "loopî for quite a while.. I thank the Commission for its greatly expanded inclusion of questions and comments from the public

and hope you will be tolerant of those of us who are concerned citizens but nowhere near as expert on the subject of nuclear power as we would like to be. These are the questions I have already given to your staff and which I hope you will be able to answer for us today:

I. Nuclear waste, particularly long-lived spent fuel rods, was to be removed within a reasonable time by the federal government. Therefore, the subject of nuclear waste was labeled ìgenericî and could not be discussed at hearings for individual plants. However, instead of their being removed more spent fuel rods than had been planned to be contained on site have been placed closer together in the the cooling pool than was originally thought to be prudent. Thirty years later, there is still no time set for removal of these wastes from our county. Should setting a date for beginning to remove wastes be a condition for

SLD-AC-2

Template = ADM-013

E-RIDS = ADM03
Add = M. Masnik (MTM2)

approval of adding twenty years of producing radioactive wastes?

SLD-AC-3

2. Citizens were told that an operating license would be limited to 40 years because the metal in nuclear containers was expected to become brittle by longer use and to crack. What new studies prove otherwise?

SLD-AC-4

3. First hearings predicted no population growth on Hutchinson Island near the plant. Population on South Hutchinson Island was zero at the time. Now that many high rises holding many people exist south of the plants, what different plan for population evacuation in case of accident has been established? Are additional traffic lanes or people transporters for evacuation indicated by current and expected population? Note: since this hearing, the 100,000th resident has been added
to the City of Port St. Lucie, which at the time of the plant's original licensing had
a population of about 350 altogether.

SLD-AC-5

4. What class of individual of what age, weight, sex, or other attributes, working or living no more than seven miles from the plants has been determined to be the most vulnerable to solaced normal radiation exposure? What is the difference between the population living within a 50 mile radius of the site in the year 2000 and when the

plants began operation, and what was the population predicted for the year 2000 at the time of the first hearings?

SLD-AC-6

5. At the thirty year ago public hearings, concern was expressed over studies which showed the likelihood of a high concentration of radioactive iodine in the milk of nursing mothers and in milk goats living close to the plants along Indian River Drive. Goats were said to have seven times the concentration rate of that of milk cows. Have new studies been done to answer those concerns or to monitor and notify lactating women or goat farmers?

SLD-AC-7

6. Parents of St. Lucie County children who seemed to have a high incidence of tumors were seeking answers as to whether there was a nuclear plant emissions connection. Have these questions been resolved?

SLD-AC-8

7. During the past thirty years has new equipment for improving nuclear plantsí safety been developed that might not have seemed cost effective to install at St. Lucie I or 2 for the 40 year operating period but should be installed for an additional twenty year operation?

SLD-AC-9

8. Finally, but perhaps most important, does the predicted long term terrorism threat that the federal government is planning for and with nuclear power plants labeled one of the most likely targets, should St. Lucie 1 and 2 be closed as soon as possible instead of given an extended

life?

At the end of the meeting I was told that questions 5 and 6 would be checked on and answered later. The other comments or questions were discussed but my notes indicate satisfactory answers were not forthcoming.

However, bearing on question 8, on January 8, 2003 I received from Senator Bob Graham a response to a letter I had written to him on October 17, 2002, regarding the possibility of attack on our plants from the air, enclosing a clipping regarding a rumor that a small plane had circled low over the plant site without being intercepted.

Senator Graham transmitted my letter and contents to NRC on October 31, 2002, and it was replied to by William D. Travers, Executive Director for Operations on December 16, 2002. His reply was thoughtful and clear. It stated that NRC requires plant construction to be able to withstand tornadoes, hurricanes, and earthquakes, and that it is felt that these design features would afford a "measure" of protection against deliberate airplane impacts. When St. Lucie I and 2 were built, no one was thinking of the need for protection against a deliberate airplane attack, and it doesn't seem we are sure now that the plants are redundantly safe from such. However, at this time, thinking the even more unthinkable, my concern is not for a Twin Towers type attack but for the dropping of a bomb onto the plants or the spent rod fuel assembly pools. Such an event would surely produce a catastrophic reaction. And while immediately after September 11, 200l, we were told that our plant would be guarded from the air by military planes, that plan was soon abandoned, and as the incident referred to above shows, the plants are unprotected from air, land, or sea missiles. Therefore, my objection, voiced in number 8 above, remains and is even more strong since receiving Mr. Travers letter.

Would you be so kind as to give him copy of this email? I have only his generic NRC land address.

And will you please answer the other seven points raised in my above statement.

Thank you.

Sincerely,

Betty Lou Wells

11/01/02
67 FR 66674
(4)

SLD-AD

From: <JJHacienda@aol.com>
To: <StLucieDSEIS@nrc.gov>
Date: 1/11/03 6:52PM
Subject: RE: St. Lucie Plant

Re: " St.Lucie-specific supplement to the Generic Environmental Impact Statement (GEIS) for License Renewal"

SLD-AD-1

Please do not extend the life of the St. Lucie nuclear plant. Residents of the area were told at site hearings that they were built to last 40 years. Why and how has that changed?
The continuation of plants past their planned life-span increases the danger of accidents.

SLD-AD-2

My main opposition then and now to a nuclear plant is to the extremely toxic waste being produced by the plant without safe storage for it, which was promised to the residents at the time of siting.

Note: I represented the League of Women Voters in the state site hearings in St. Lucie County on nuclear power plant II.

Thank you for your time,

Judy James

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E-RIDS = ADM-03
add = M. Manley (MTM2)

Template = ADM-013

FPL

Florida Power & Light Company, 6501 S. Ocean Drive, Jensen Beach, FL 34957

January 9, 2003

L-2003-005
10 CFR 51
10 CFR 54

11/01/02
67FR66674
(5)

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

SLD-AE

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Comments on Draft Supplemental Environmental Impact Statement for
License Renewal of Nuclear Plants Supplement 11

Florida Power & Light Company (FPL), the applicant for the renewal of operating licenses DPR-67 and NPF-16 for St. Lucie Nuclear Plant, Units 1 and 2 respectively, provides the following comments on the referenced Draft Supplement Environmental Impact Statement (DSEIS).

FPL agrees with the overall conclusions and proposed findings in the DSEIS. FPL offers the following comments in the Attachment to this letter. FPL urges the Commission to issue a final EIS addressing the environmental impacts of the proposed renewal of the St. Lucie Units 1 and 2 operating licenses as soon as possible.

Should you have any questions concerning FPL's comments, please contact S. T. Hale at (772) 467-7430.

We appreciate the opportunity to comment on the DSEIS.

Very truly yours,

D. E. Jernigan
Vice President
St. Lucie Plant

DEJ/STH/hlo
Attachment

Template = ADM-013

E-RIDS = ADM-03
Add = M. Masnik (MTM2)

COMMENTS ON DRAFT GENERIC ENVIRONMENTAL IMPACT STATEMENT (NUREG 1437 SUPPLEMENT 11) ST. LUCIE UNITS 1 AND 2 LICENSE RENEWAL APPLICATION

	PAGE	LINE NUMBER	COMMENT
SLD-AE-1	xviii	26	Delete "and chronic effects from electromagnetic fields " Add period after "justice." FPL did not present an analysis of chronic effects from electromagnetic fields.
SLD-AE-2	1-07	28	Change the word "Westinghouse" to "Combustion Engineering "
SLD-AE-3	2-01	35	Change "Juniper" to "Jupiter."
SLD-AE-4	2-05	28, 31, 34	Change "Florida Aquifer" to "Floridan Aquifer."
SLD-AE-5	2-08	31-34	Clarify by including information that FPL has dredged the intake canal on several occasions, most recently in the fall of 2002. On one occasion, in the mid-1990's, the dewatered sediments were sold as clean fill.
SLD-AE-6	2-14	32	SEIS states, "The last 2.4 km (1.5 mi) of the right-of-way is shared with three other 230 kV lines..." should be corrected. There are four other 230 kV lines entering the Midway Substation.
SLD-AE-7	2-14	33	SEIS states "...total right-of-way width is approximately 1080 feet " Although there is a short section of North-South leg that is approximately 1080 ft., the majority of the right-of-way is approximately 800 feet.
SLD-AE-8	2-15	06	Correct spelling of "right-or-way" to "right-of-way."
SLD-AE-9	2-17	02	It is not clear that the site no longer has a package plant. Reword as follows· Period after "wastewater " Second sentence to read, "The treated wastewater was previously discharged to the discharge canal. Now the site sanitary wastewater is discharged to St. Lucie County's South Hutchinson Island Water Reclamation Facility for treatment."
SLD-AE-10	2-21	01	The conversion of 236,146 lb of bluefish should be corrected to 107,000 kg.
SLD-AE-11	2-22	31-32	Sentence should read, "The whales are listed as endangered by the Federal government and the State of Florida."
SLD-AE-12	2-28	02	"Habiats" should be corrected to "Habitats."
SLD-AE-13	2-32	27	This section, "Radiological Impacts" is not appropriate in this chapter. The conclusions regarding the effects and impacts of offsite emissions should be moved to the corresponding section in Chapter 4, Section 4.3.
SLD-AE-14	2-35	22 and 41	The "a" designation on the reference citation, U.S. Census Bureau 2000a, should be dropped as it is not consistent with that listed in the reference section.
SLD-AE-15	2-35	31-37	Note that the projected values for 2010 and 2020 are higher than that presented in ER and a different source is used. However, the growth rates are the same as presented in the ER for these years. In addition, the calculations for the annual growth rates appear to be incorrect. For Martin County the values should be 12.8, 5.8, 2.6, 2.0, and 1.7, respectively for the years presented in Table 2-7; similarly the values for St. Lucie County should be corrected to 7.1, 7.2, 2.8, 2.2, and 1.8.

L-2003-005
Attachment
Page 2 of 7

	PAGE	LINE NUMBER	COMMENT
SLD-AE-16	2-36	24	The value given for the peak demand per day, 5.8 MGD is not consistent with that stated in the ER (5.4 MGD).
SLD-AE-17	2-37	9	Change "Solerno" to Salerno "
SLD-AE-18	2-37	20	Delete "and crosses I-95 near Ft. Pierce." Add new sentence "I-95 crosses to the west of the Florida Turnpike south of Stuart and crosses back to the east at Ft. Pierce."
SLD-AE-19	2-38	Table 2-9	Values presented in this table should be verified and corrected. Given the residential land use for St. Lucie County of 138 mi^2 is correct, the conversion to km^2 should be corrected from 97 to 357. The sum of the land use values for St. Lucie County in mi^2 should be corrected from 542 to 641. If correct, the percent of total values should be corrected accordingly.
SLD-AE-20	2-40	25	"are" should be "is "
SLD-AE-21	2-41	04	The value given for the population of Stuart, 14,633 is inconsistent with that stated in the ER (4,633). The number in the ER contained a typographical error and the value presented in the SEIS has been verified to be correct.
SLD-AE-22	2-41	05-07	Growth rates provided for St. Lucie and Martin counties (28% and 26%, respectively) are not consistent with values presented in Table 2-7. See earlier comment regarding corrections to this table. These growth rates should be corrected accordingly.
SLD-AE-23	2-41	37	The values for the agricultural land use for both St. Lucie and Martin County should be corrected in accordance with corrections made in Table 2-9.
SLD-AE-24	2-41	38	The reference for agricultural land use values should be corrected from Table 2-10 to Table 2-9.
SLD-AE-25	2-41	41	The number of farms in St. Lucie and Martin counties (805) is inconsistent with that presented in the ER (359). The value presented in the ER has been verified to be correct for the number of <u>farms that hire</u> and the number presented in the SEIS has been verified to be correct for the <u>total number of farms.</u> Relative to the discussion of migrant farm workers, it would be more appropriate to use the number of farms that hire.
SLD-AE-26	2-42	06	Reference citation USDA 2001a is inconsistent with that listed in the reference list Delete the "a" designation.
SLD-AE-27	2-42	24	Second column should be titled "Total Property Tax Levied for all Property in St. Lucie County."
SLD-AE-28	2-42	25-29	Property tax amounts paid to St. Lucie County for St. Lucie Units 1 and 2 for years 1996, 1998, and 1999 vary slightly from the dollar amounts presented in the ER. The amount in the ER for 2000 was an estimate and was reflective of the total FPL property tax for St. Lucie County. To clarify the record, the ER value for the 2000 taxes to be paid for St. Lucie 1 and 2 only would have been correctly stated as $18.8 million. Also, in line 29, "$18.888,240" should be corrected to "$18,888,240 "

	PAGE	LINE NUMBER	COMMENT
SLD-AE-29	2-42	25-29	The 1999 tax assessment for St. Lucie 1 and 2 ($22,807,970) is 10.3% of the total property taxes ($221,893,569) and the 2000 tax assessment for St. Lucie 1 and 2 ($18,888,240) is 8.5% of total county property taxes ($222,310,596). These results will change the average quoted on page 4-26 line 13. Correct table entries accordingly.
SLD-AE-30	2-42	Note (c)	Should read "State of Florida data on migrant farm workers were not available "
SLD-AE-31	2-43	17	"...Brighton Seminole, located about 76 km (47 mi) to the east of the St. Lucie plant..." should be corrected by changing the word "east" to "southwest."
SLD-AE-32	2-47	9-10	Change "before construction" to "before operation."
SLD-AE-33	4-02	09	"of" should be "to."
SLD-AE-34	4-02	26 and 32	Altered Salinity Gradients is applicable to plants discharging to estuarine systems. Given that St. Lucie discharges to an ocean environment, this issue is not applicable to St. Lucie. Eutrophication is an issue applicable to small stratified water bodies. Given that St. Lucie discharges to a large oceanic water body, this issue is not applicable to St. Lucie. These issues should be removed from this table and added to Appendix F.
SLD-AE-35	4-03	15	Delete this line. St. Lucie 1 & 2 use once-through cooling and the GEIS reference discussion relative to cooling system noise impacts is specific to cooling towers. It is incorrect to group the noise issue with the cooling system impacts. The GEIS addresses plant noise beyond that associated with the cooling system.
SLD-AE-36	4-05	37-38	"...and the ecological risk assessment study for the cooling canal system (Ecological Associates 2001)." The referenced study was a survey report not a risk assessment for the cooling canal system. Also cited on page 4-6, line 24.
SLD-AE-37	4-09	13-21	Delete these lines. See the comment above for page 4-03 line 15.
SLD-AE-38	4-12	39	"...impacts related to entrainment and no..." should be corrected to read "...impacts related to impingement...."
SLD-AE-39	4-13	13	Reference citation (USAEC 1973) is not consistent with that listed in the reference list and should be corrected to (AEC 1973).
SLD-AE-40	4-14 4-16	34 22-31	Delete these lines. GEIS Section 4.5.3 does not address on-site land use
SLD-AE-41	4-17	27	"licence" should be "license "
SLD-AE-42	4-28	16-20	The Florida State Historic Preservation Officer has stated that renewal of the operating licenses for St. Lucie Units 1 and 2 would not affect historic properties. Based on this finding, it is not clear why the DSEIS contains the wording at lines 16-20, particularly where no refurbishment activities will occur. This wording should be deleted. The current Environmental Protection Plan addresses the performance of environmental evaluations. This statement bounds the requirements for environmental evaluations. The SEIS should not impose any new or additional environmental commitments.
SLD-AE-43	4-33	06	The conversion of 35.3 MGD should be corrected from 14.8 x $10^4 m^3/d$ to 1.34 x $10^5 m^3/d$.

	PAGE	LINE NUMBER	COMMENT
SLD-AE-44	4-33	1-22	In this paragraph, the NRC addressed groundwater use conflicts (potable and service water; plants that use > 379l/min [>100gpm]) as an applicable Category 2 issue, citing the indirect withdrawal of groundwater at the St. Lucie site in excess of 100 gpm as the basis. This determination is not consistent with the scope of this issue as defined in the GEIS and codified by 10 CFR 51. NRC in GEIS Section 4 8.1," Groundwater Use," states, "This impact could occur as a direct effect of pumping groundwater, ..." (emphasis added). Furthermore, the specific concern for this issue is that the cone of depression associated with direct pumping of groundwater onsite could potentially extend beyond the plant boundaries and impact offsite groundwater users. Section 4.8.1 of the GEIS limits the scope of this issue to the direct use of groundwater and acknowledges that the indirect use through municipal supply is not of concern. Therefore, analysis of this issue should not be expanded to include indirect use. Accordingly, this section should state that there are no Category 2 issues applicable to St. Lucie Units 1 and 2 during the license renewal term. The statement on line 2, "There are no Category 1 issues applicable to groundwater use and quality for St. Lucie Units 1 and 2 during the renewal term." is incorrect. The issue "Groundwater quality degradation (saltwater intrusion)" is a Category 1 issue that is applicable to St. Lucie NRC in GEIS Section 4.8.2.1 characterizes this issue as Category 1 and discusses the potential for indirect impacts of St Lucie's use of municipal supply which uses groundwater as the source water. Consistent with other sections, the table presented in this section should identify this issue as an applicable Category 1 issue. The 10 percent threshold used in NRC's discussion (lines 4-6) is not correctly applied given the discussion is relative to the Category 2 issue of groundwater use conflicts. This threshold was specifically used by NRC in the GEIS for the impact significance of groundwater quality relative to saltwater intrusion (See GEIS Section 4.8.2 1). The GEIS does not provide such a threshold for evaluating impacts from the direct use of groundwater. This section should be revised to address the applicable Category 1 issues and state that there are no Category 2 issues applicable to St. Lucie Units 1 and 2. Accordingly Table 4-8 should be deleted and it should be noted that the GEIS section cited for the Category 2 issue listed in this table should only be Section 4.8.1.1. GEIS Section 4.8.2.1 addresses the category 1 issue regarding saltwater intrusion.
SLD-AE-45	4-35	37	Change the word "that" to "than" and strike the words "or equal to "
SLD-AE-46	4-36	10	Strike the words "met or."
SLD-AE-47	4-36	18	Change "are monitored" to "are normally monitored." This reflects those times when monitoring is not possible or required by license condition.

	PAGE	LINE NUMBER	COMMENT
SLD-AE-48	4-37	13	This discussion is not up to date. It does not consider the letter reprinted at page E-31, and does not consider FPL's letter to the Staff clarifying whether a consultation is required. Add the following words following the sentence ending on line 13: "By letter dated August 23, 2002, the NRC Staff requested reinitiation of consultation with NMFS regarding the incidental capture of green and loggerhead turtles at St. Lucie Units 1 and 2. By letter dated September 20, 2002, FPL informed the NRC Staff that it would cooperate with the Staff's data request regarding the consultation process, but stated that there was no factual or legal basis for the NRC's reinitiation of consultation in this case."
SLD-AE-49	4-40	06	"Informal consultation with the FWS was initiated by FPL in April 2001..." is not correct as only Federal agencies can initiate consultation. This sentence should be revised to read, "NRC initiated informal consultation in February 2002 with a request for information concerning which species are potentially...."
SLD-AE-50	4-40	06	Reference citation FPL 2001b is not the correct correspondence discussed in this sentence.
SLD-AE-51	4-44	01	"form" should be "from."
SLD-AE-52	5-05	05	Change "safety analysis" to "safety assessment "
SLD-AE-53	5-07	Table 5-3 Footnote (b)	Start the sentence, "The Unit 2 LOCA value, originally ..., was " The Unit 2 LOCA value needed correction and in turn effected a misstatement of the "Others" value.
SLD-AE-54	5-09	11	Reference NRC 1988 is not provided in the reference list.
SLD-AE-55	5-13	01,02	Change the word "account" to "compensate." Insert the word "apparent" before "non-conservatism." Delete the phrase, "This relatively small non-conservatism notwithstanding,". Begin last sentence with "The Staff considers..."
SLD-AE-56	5-21	23 and 37	Reference citation NRC 1997a should be corrected to NRC 1997d. The correct source is NUREG/BR-0184 which is listed as NRC 1997d in the reference list.
SLD-AE-57	5-23	03	Reference citation NRC 1997b should be corrected to NRC 1997d. The correct source is NUREG/BR-0184 which is listed as NRC 1997d in the reference list.
SLD-AE-58	5-23	11	Reference citation NRC 1997a should be corrected to NRC 1997d. The correct source is NUREG/BR-0184 which is listed as NRC 1997d in the reference list.
SLD-AE-59	5-24	37	Reference citation NRC 1997b should be corrected to NRC 1997d. The correct source is NUREG/BR-0184 which is listed as NRC 1997d in the reference list.
SLD-AE-60	5-26	3rd reference from bottom	The name is spelled "Gleaves."
SLD-AE-61	6-06	37	Add the following text after "nuclear waste: "Both the Senate and Congress subsequently voted to override a veto of the President's selection of the Yucca Mountain site by the Governor of the State of Nevada."

	PAGE	LINE NUMBER	COMMENT
SLD-AE-62	8-04	28	This sentence states that the volume of low-level radioactive waste could vary greatly depending on the length of time it {the reactor} operated. However, the NRC states in the GEIS (Section 7.3.2) that decommissioning waste volumes would be essentially the same for a plant operated for 40 years as for a plant operated 60 years. Resolve the apparent discrepancy by deleting the phrase "the length of time it operated."
SLD-AE-63	8-05	35	NUREG-0586 (NRC 1988) is cited in the text here, but not included in the reference list in Section 8.4.
SLD-AE-64	8-07	33	The statement is made that the land west of the intake canal and south of the transmission lines could not accommodate a coal or new nuclear unit, but "could potentially accommodate a completed natural gas combined cycle plant to replace St. Lucie Units 1 and 2." Several "obstacles" are mentioned, but one significant "obstacle" is omitted: the lack of an existing gas pipeline that could provide fuel to the site. This should be added to the other "obstacles" already listed.
SLD-AE-65	8-10	18	The "a" used on the reference citation "FPL 2001a" should be deleted, as this designation is not used in the reference list.
SLD-AE-66	8-11	03	Sentence beginning with "Annual coal consumption .." should be deleted as this information is given in the previous paragraph.
SLD-AE-67	8-11	17	"Spent selective catalytic reduction (SCR) catalyst" should be deleted from the list of wastes identified in this sentence since, as noted on page 8-17, line 21, spent SCR catalyst would not be disposed of onsite.
SLD-AE-68	8-13	07	For Coal-Fired New Generation – Environmental Justice was quoted in Table 8-2 as "Small" and "Small to Moderate" in Table 9-1.
SLD-AE-69	8-22	17, 18	For Natural Gas-Fired New Generation – Environmental Justice was quoted in Table 8-2 as "Small" and "Small to Moderate" in Table 9-1.
SLD-AE-70	8-23	25	NRC cites FPL's ER as the source in listing design assumptions for the gas-fired alternative, including use of low-sulfur number 2 fuel oil as backup fuel. Delete this design assumption from the list, since FPL did not assume use of fuel oil as a backup fuel in its ER.
SLD-AE-71	8-26	20	NRC estimates spent SCR catalyst generated from operation of the gas-fired alternative to be 31 cubic meters per year. The source for this estimate is not indicated, but in Section 8.2.2, Page 8-23, Lines 29-30, NRC indicates that, unless otherwise indicated, assumptions and numerical values used throughout this section are from the FPL ER. FPL did not quantify the amount of spent SCR catalyst in its ER. It would be appropriate for the NRC to provide a reference for this quantity.

	PAGE	LINE NUMBER	COMMENT
SLD-AE-72	8-42	40-41	The DSEIS makes the following statement in regard to additional DSM to help to address the capacity that would be lost if the OL's for the two St Lucie units are not extended: "While the DSM measures would have few environmental impacts, the operation of the new natural gas-fired plant would result in increased emissions (compared to the OL renewal alternative) and other environmental impacts." Delete the phrase, " While the DSM measures ... impacts," and replace with, "Additional DSM that replaces nuclear capacity, in part or in total, will result in FPL's existing fossil fuel units operating at higher capacity factors than they otherwise would, thus increasing total emissions from the FPL system. Start a new sentence, "In addition, the operation of a new gas-fired ...."
SLD-AE-73	9-05	28, 29	Delete the phrase "except for the SAMA identified above." Put a period after "warranted."
SLD-AE-74	E-2	Table E-1	Third entry (FWS and NMFS) – the FPL letters should not be referenced here. The letters from the FWS and NMFS providing the results of the consultation should be provided. The remarks for this entry should also be revised to discuss NRC's consultation versus the correspondence FPL had with the agency. It is incorrect to say that FPL initiated the consultation. If the FPL letters remain in the table, the second letter number should be corrected from PLL-LR-02-0054 to PSL-LR-0054.
SLD-AE-75	E-2	Table E-1	Fourth entry (U.S. Army Corps of Engineers) – the Authority information should be revised to read, "Rivers and Harbors Act (33 USC 403) and Clean Water Act (33 USC 1344).
SLD-AE-76	E-3	Table E-1	Provide a note that the NPDES permit is the Industrial Wastewater Facility Permit. In Chapter 2 of the DSEIS it is mentioned several times as the Industrial Wastewater Permit. This would create a link for the reader.
SLD-AE-77	E-4	Table E-1	Updated information for these annual FWCC permits is as follows: 1) 01S-018 has been replaced by 02R-018 and expires 6/30/2003 2) TP#206 expires 1/31/2003 3) TP#125 expires 1/31/2003 Last entry – "next" should be corrected to "nest" in the Description column.
SLD-AE-78	E-5	Table E-1	First entry – The updated information is: 1) 56-01238-W expires 5/21/2009
SLD-AE-79	F-2	15-16	Groundwater quality degradation (saltwater intrusion) is an applicable issue to St. Lucie due to their indirect use of groundwater through the municipal supply for potable and service water. Therefore this issue should be deleted from the table and appropriately discussed in Section 4.5.
SLD-AE-80	F-2	Table F-1	Groundwater use conflicts (potable and service water and dewatering); plants that use >100 gpm should be added to the table as not applicable because St. Lucie Units 1 and 2 do not withdraw groundwater.

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JAN 16 PM 12:06
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SLD-AF

From: Mark Oncavage <oncavage@bellsouth.net>
To: <StLucieDSEIS@nrc.gov>
Date: 1/13/03 11:29AM
Subject: Comments of Draft Report

Chief, Rules and Directives Branch January 13, 2003
Division of Administrative Services
U.S. Nuclear Regulatory Commission

Dear Sir:

SLD-AF-9

On April 3, 2002 I presented oral comments, for the record, concerning scoping for an EIS supplement on extending the license of the St. Lucie nuclear plant. The public safety issues I presented were omitted by the NRC in publishing Supplement 11, Draft Report, NUREG-1437. I have simplified the 8 issues that were embedded in the oral comments. These issues, concerning public health and safety, need to be explained in substantial detail in the Final Report of Supplement 11, NUREG 1437 to be in compliance with the National Environmental Policy Act (NEPA), as amended.

SLD-AF-1

1. The EIS needs to state the fatalities, the injuries, the economic loss, and the scope of evacuation as consequences resulting from a worst case zirconium fire in a spent fuel pool at the St. Lucie nuclear plant.

SLD-AF-2

2. The EIS needs to state the probability of a zirconium fire occurring in a spent fuel pool at the St. Lucie nuclear plant. The probability calculation needs to combine accidental fires, sabotage fires, and terrorist caused fires.

SLD-AF-3

3. The EIS needs to state the calculated time sequences leading to a zirconium fire as a result of sabotage or terrorist attacks.

SLD-AF-4

4. The EIS needs to state the consequences, the recalculated probability, and the recalculated time sequences of a zirconium fire at St. Lucie to assist emergency preparedness administrators in creating a new evacuation plan and to assist members of the public in creating their own personal emergency plans.

SLD-AF-5

5. The EIS needs to state what mitigation, if any, is available once a zirconium fire at the St. Lucie nuclear plant has started.

SLD-AF-6

6. The EIS needs to state the results and conclusions of all the research in the NRC's possession related to extinguishing a zirconium fire in a spent fuel pool of a nuclear plant.

SLD-AF-7

7. The EIS needs to state the probability and consequences of a zirconium fire in a spent fuel pool at St. Lucie, igniting a zirconium fire in the adjacent spent fuel pool.

SLD-AF-8

8. The EIS needs to state the results of the research program concerning St. Lucie, safety issues, and terrorism that was mentioned by NRC official, Jim Medoff, at the ACRS meeting in Florida City, FL on March 13, 2002.

Respectfully Submitted

E-RIDS=ADM-03
Add=M. Masnik (MTM2)

Template=ADM-013

Mark P. Oncavage

Frank Leslie

To: StLucieDSEIS@nrc.gov
Subject: Personal Comments on St. Lucie Relicensing Plant Specific GEIS, Supplement 11

Chief
Rules and Directives Branch
Mailstop T-6D 59
U.S. Nuclear Regulatory Commission
Washington DC 20555-0001

1/01/02
67FR66674
(7)

RECEIVED
JAN 16 PM 4:45
Rules and Directives Branch

Dear Sir:

Following are my personal comments on Supplement 11:

Comments on St. Lucie Nuclear Power Plant Relicensing GEIS, Supplement 11
From Frank R. Leslie, 1017 Glenham Dr., NE, Palm Bay FL 32905, 321-768-6629,
f.leslie@ieee.org on 12/02/2002

SLD-AG-1 General comments: Use of SMALL, MODERATE, and LARGE impact on the environment qualifiers is a good approach to focus on the effects rather than various quantities.

SLD-AG-2 More emphasis upon the risk calculations is desirable to clarify the probability of possible events in the context of everyday risks such as driving to work. The public perceives risks to be far worse when they don't choose those risks. As examples, a mountain climber may rail against the risk of a city street air pollutant or second-hand smoke, or joggers may choose to run alone and unarmed in mountain-lion country.

SLD-AG-3 Plant safety/security comments: Discuss and clarify recent USA Today stories about a SANDIA report discussing offsite radiation release plumes of 500 miles extent rather than the 50 mile limit used in the Supplement. The radiation levels at varying distances must have great meaning. While the St. Lucie plant has clearing of a potential plume release by westerly weather winds, it also has easterly to southeasterly sea breeze winds that could send a release plume across the state towards Orlando or Tampa.

SLD-AG-4 Since much has been made by antinuclear activists of the potential for zirconium spent-fuel fires and release dispersion, a detailed study of possibilities of those fires (a fault tree analysis) should be made in a way as to fully inform the public as to how such risks are computed. Loss of pool coolant and terrorist actions should be considered.

SLD-AG-5 Video surveillance systems using software intruder-path detection and alarming should be employed to supplement the security forces alertness. These cameras may be especially useful in detection of boats and swimmers approaching the Lagoon side of the plant. Electric-field detection fencing is a first level of defense. Ultrasonic sensors in the barge channels are necessary to detect underwater swimmers. Consultations with the Sandia Intrusion Detection Lab and Special Forces teams would help determine means of attack and defense. The plant security force members periodically should consider how they would attack the plant with their level of knowledge, and then help design the means to prevent such attacks. Do not downplay obscure or low-probability attacks.

The following comments primarily address the alternative energy aspects of relicensing considerations.

SLD-AG-6 Section 8 Alternatives to Nuclear Relicensing

- Fossil fuel plants produce more air/water pollution than nuclear plants, but few are as concerned about non-nuclear pollution.

- Wind and solar-electric plants would require extensive land areas due to the low energy density of the sources. Neither appears to be a viable replacement for large base-load plants.

- Hydropower has limited resource in Florida and environmental blocking objections, while ocean wave and tide energy appears to be uneconomic and environmentally problematic

1

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E-RIDS = ADM-03
Add = M. Masnik
(MTM2)

within the next twenty years.

· Oil is too precious a resource to burn in fixed locations for heat. Transportation and chemical use must take priority.

· Biomass combustion produces pollution and CO2, which many believe contributes to global warming (climate change). Municipal stream waste (MSW) contains heavy metals such as lead, mercury, and zinc that should not be incinerated.

SLD-AG-7 · Catastrophic extremes (site failure core meltdowns) may have lower computed impact costs than meteor strikes or tsunamis; Should we take action to preclude those and similar events?

SLD-AG-8 Summary of comments: Table 9-1 displays the SMALL impact of relicensing versus the other replacement power possibilities that range from MODERATE to LARGE impacts. License renewal thus appears to be the best action now, and in perhaps twenty years, other energy alternatives may be better suited and economic.

Frank R. Leslie

Disclaimer: These are personal comments and do not necessarily represent the positions of Florida Institute of Technology.

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|=-=-=-=-=-=-=-=-=-=-=-=-=-=-=-=-=-=-=-=-=-=-=-=-=-=-=-=-=-=-=-=-=-=-=-=-=-=-=-=-=-|
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| www.geocities.com/windy4us (Wind Energy Experimenters) |  KD4EYQ  020912 |
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ST. LUCIE COUNTY CHAMBER OF COMMERCE

December 6, 2002

RECEIVED
Rules and Directives Branch

Dr. Michael T. Masnick
Mail Stop O-12D3
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20277-2904

Re: License Renewal for the St. Lucie Nuclear Power Plant

Dear Dr. Masnick:

SLD-AH

I am writing to you on behalf of the St. Lucie County Chamber of Commerce. The St. Lucie County Chamber of Commerce, representing approximately 1,100 local businesses, supports the renewal of the license for the St. Lucie Nuclear Power Plant.

SLD-AH-1

The St. Lucie Plant is an important member of our business community. They contribute to many local non-profits, such as the St. Lucie County Education Foundation, The United Way, The St. Lucie County Marine Center and the Economic Development Council of St. Lucie County. The St. Lucie Plant also has a major economic impact on our area, both directly as one of the County's largest sources of property taxes, and indirectly through the jobs that the plant provides. The St. Lucie Plant currently has 800 full-time employees, and these are good jobs for our community. I am told that the economic impact of the plant on our local community is $80,000,000.00 annually.

SLD-AH-2

However, the most important economic impact of the St. Lucie Plant is the inexpensive consistent power which it provides to our area. In the past, businesses took this power for granted, however, with the recent events in California, and the potential for disruptions to our oil supply caused by events in the Middle East, we are especially lucky to have the St. Lucie Nuclear Power Plant in our County.

Best regards,

W. Lee Dobbins

Chamber of Commerce / Port St. Lucie
1626 S.E. Port St. Lucie Blvd.
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Phone 772.335.9900
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www.stluciechamber.org

Template=ADM-013

E-RIDS=ADM-03
Add=M. Masnik (MTM2)

Dr. Michael T. Masnick
December 6, 2002
Page 2

WLD:rl

cc: Rachel Scott
Al Rivett

F0011862v

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

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January 15, 2003

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

11/01/02
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(6)

SLD-AI

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-though 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.

Template = ADM-013

E-RIDS = ADM-03
add = M. Masnik (MTM2)

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,

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:

SLDAI-1 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.

SLD-AI-2 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:

SLD-AI-3 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.

SLD-AI-4 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 entrainment in the intake canal were discussed in the DGSEIS.

SLD-AI-5 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:

SLD-AI-6 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:

SLD-AI-7 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 defoliants. Similarly, the FGSEIS should include details regarding broadcast applications for weed control (types, frequency, quantities, alternatives to chemical applications, etc.).

SLD-AI-8 Applying herbicides and weed killers can impact surface and groundwater resources. This
SLD-AI-9 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:

SLD-AI-10 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.