

*ADJ Accused
1/19/05*

January 10, 2005

12/10/04

69 FR 71854

191

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration, Mailstop T-D59
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Ref: Comments / Dominion – North Anna Power Station Early Site Permit

With regard to the information posted for comments for Dominion-Virginia Power's North Anna Early Site Permit, please consider my comments based on the published information regarding the preliminary recommendation on the issuance of this permit.

First and foremost the information in Part 2 – Site Safety Analysis, Chapter 2 – Site Characteristics, Section 2.1.3 pertaining to population distribution. This information references the most recent Evacuation Time Estimate (ETE) for the NAEP is based on the Census 2000 data and the total population is noted as 20,292. This information is contradictory to the information noted in Chapter 4, Section 4.4.1.1 Groups Vulnerable to Physical Impacts, 4.4.1.1.1 People – This section notes the area within 10 miles of the ESP to be estimated to be populated by approximately 15,500 people. This information references Section 2.5, 2.5.1.1. The information contained in Section 2.5 is current data. This information is contradictory in it's self, which leads to believe that there are more contradictions other than these since the data referenced is from various time spans dating back to the mid-1980s.

The population data needs to be strongly scrutinized as new developments in the Louisa area around Lake Anna are consistently developing, as well as areas of Spotsylvania and Hanover County. I also feel that route alerting needs to be addressed in the Emergency Planning Section as well, if sufficient sirens are not currently yet in place.

Tables 2.5-1 through 2.5-6 discuss the fault that runs through this region, however the data that is provided is based on Crone & Wheeler of 2000 prior to the relatively recent strong earth quake (tremors) that occurred in early May of 2003 and on December 9th, 2003 in this region. Also, the information referenced in Figure 2.5-14 Seismic Source Zones and Seismicity in Central & Eastern North America is based on magnitude

E-RJ35-ADM-03

Adm = J. Cushing (JXC9)

A. Williamson (ARW)

SFSP Review complete

Temp Estu = ADM-013

information from 1987 data, which is over 18 years old. Figure 2.5-19 Bechtel Group EPRI Sources, no date on this data is noted other than the Bechtel/EPRI data, which is, dated 1987-1989. The opening letter in Appendix J – Down Hole Seismic Report & Data to Mr. J. A. Price is dated March 17th, 2003, which is also before both of these previous events. Since these events have occurred in this specific region, and significant boring will occur during construction, I feel that this information should be re-evaluated using current data, and not based on data that is over 18 years old.

The information in Tables 2.5-16 – Table 2.5-21 all specifically state that the information is from 1989 EPRI data. This information is over 16 years old. Certainly there is more current information from EPRI – this information is closer dated for the use for previous construction at North Anna Power Station than for new units not yet constructed. No information is provided which stipulates what the data is based on. The other remaining Tables do not include this date reference on or within the data, which leads you to believe that the basis of this data is also more than 15 years old.

Section 4, 4.4.1.1.3 Roads – The transportation network in the Louisa County area is very well-developed, however, new construction and development in this area has hampered travel on many instances especially during the peak vacation time around the lake area and also during inclement weather as most roadways are two lane rural. Further investigation in to this information would be beneficial, especially with regard to route alerting should it be necessary for any reason during construction activities as the roadway network could be hampered during construction, should an emergency event occur.

Section 4.4.1.1.4 – Recreational Facilities – Where this information mentions that fugitive dust would not be a discernible impact on Lake Anna or adjacent environs, additional information should be evaluated. This information mentions discernible impact. To whose discretion? This information also mentions installing a barrier to prevent the migration of turbid water plume into the lake, *if necessary*. This should be a requirement based on Dominion's commitment to public safety and health measures and today's environment concerning potential hazardous risks to the public.

Section 4.4.3 – Environmental Justice Impacts – In this Section the information only mentions the potential for disproportionately high and adverse human health or environmental impacts *on minority and low-income populations that reside within an 80-km (50 mile) radius of North Anna during construction*. This information could be construed as discriminatory. This implies that only minorities and low-income individuals reside within a 50-mile radius to the plant or that the implications and analysis was only performed on impact to low income residents located within this area and that other populations within this region were not considered. However, again the information mentioned in Section 2.5 is current data with regard to this information. I would suggest that the NRC take a very wholesome look at this population data and the potential effects on the *entire population* within this region of 80-km (50 mile radius) of the plant. With the increased development within this region some of the housing

developments and homes around Lake Anna are valued up to and well over \$300,000.000. There are also several very large housing developments and expensive farm operations within this area that do not seem to be considered in this evaluation in the areas of Louisa, Orange, Spotsylvania, Hanover, Montpelier, Charlottesville and Goochland. There are many schools within the region of the 80-km (50 mile radius) of the plant that are only briefly mentioned and could be affected should conditions warrant. I am sure that additional plans and measures will be developed as time permits, however, all of this data should be evaluated from current data not data that is 15 to 18 years old. A determination should be made to accurately use the information based on the 2000 Census data or current information. The total population totals mentioned in Section 4.4.3 now far exceeds the totals referenced in this section, and the disproportionately high and adverse human health or environmental effects mentioned.

Again, much of the data used in these evaluations and analysis seem to be the same data used during earlier planned construction at the North Anna ~~Power~~ Station. With the increased technology available, the most current data should be analyzed for a project of this magnitude that could have potential significant effects on the safety protection and welfare of a large area the population in this region during this time of a heightened awareness towards security. Your attention to this matter is greatly appreciated.

Sincerely,



Deborah O. Fahrner