RDB Received

12/16/04
69FR71854
(H24)

E-RIDS=ADM-03
Add=
J. Cushing (JXC9)

SISP Review Complete

United States Nuclear Regulatory Commission

Template=ADM-013

A. Williamson
(AEW1)

RDB pieces
3/3/05

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1422 GENTRY LANE
CHARLOTTESVILLE
VA 22903

12/10/04
69 FR 71854

(424)

Feb 26th 2005

Ms Alicia Williamson
US Nuclear Regulatory Commission
Washington DC 20555-001

RE: Comments on Draft NUREG-1811

Dear Ms Williamson,

We are writing to voice our dismay at the prospect of the granting of an ESP for two new nuclear reactors at the North Anna, Virginia site.

Specifically, we fail to understand why the NRC is not considering the security implications of new plants post 9/11, especially in light of the fact that the nations capital, a highly symbolic terrorist target, is often downwind of North Anna.

As residents of nearby Charlottesville, we already feel vulnerable to the possibility of a catastrophic accident (if these plants are so safe, how come the private insurance industry wont take on the risk of insuring them?) We resent the use of our tax dollars to prop up an otherwise unprofitable enterprise, and respectfully remind the NRC that they are public servants whose number one priority is, or should be, the safety of the public.

Sincerely Pete Marshall, Miriam Preus
Leah Marshall (8) x LPA (4)

RDB received
2/8/05

12/10/04
69 FR 71854
425

February 24, 2005

Chief Michael T Lesar
Rules and Directives Branch MS: T-6D59
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Chief Lesar,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers.

Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake's level to drop significantly adversely impacting water-based recreational uses of the lake. Also, the increase in the lake temperature, will negatively affect the striped bass, a popular game fish. Waters downstream will be affected similarly.

The ESP application also doesn't consider what the effect might be on the cost of power in Virginia or nationally, or the need for new generating capacity. Virginia currently has a surplus of electrical generating capacity, so excess power will likely be sold outside the state rather than being used in state to lower prices. Local residents will be forced to live with the risks of the nuclear plant without getting the benefits. The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over $100 billion.

In a time of increased terrorist threat, new nuclear power plants increase physical and economic risks to central Virginia residents, Dominion customers and shareholders, and nuclear industry employees. Al Qaeda is known to have considered nuclear power plants as a target for an attack. Terrorist threats and heightened Threat Advisory Levels may lead to severe restrictions on public access to Lake Anna, which could impact local businesses dependent on public use of the lake. This has already happened at over a dozen lakes with nuclear plants around the country. Adding additional reactors to the North Anna facility could also increase its attractiveness as a terrorist target .

Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill trained and ill equipped. Emergency plans for dealing with an accident or terrorist attack are inadequate.

In light of these concerns, and for the health, safety and economic well being of fellow citizens, I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Sincerely,

Anne McGurk

Anne McGurk
618 South Pitt St
Alexandria, VA 22314

E-RFDS=ADM-03

ESP Review Complete
Template=ADM-013

498

Addr = J. Cushing (JXC4)
A. Williamson (AEW1)

RDB received
3/2/05

Lena Lewis
1286 Timberbranch Ct
Charlottesville, VA 22902

Feb 24, 2005

12/10/04
69 FR 71854

(426)

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

cc: President George W. Bush
Governor Mark R. Warner
Senator George Allen
Senator John Warner
Congressman Virgil H. Goode Jr.

Dear Sir or Madam:

I would like to comment on report number NUREG-1811, which is a draft Environmental Impact Statement for an Early Site Permit at the North Anna ESP Site in Louisa County, Virginia.

As a citizen living in neighboring Albemarle County, I am strongly opposed to building additional nuclear reactors in Louisa, or anywhere else in the country. I understand that the technology to extract electricity from nuclear energy has been designed so that the risk of an accident is calculated to be very low. However, the results of such an accident would be so devastating that to me it falls in the category of risks that are not worth taking. My concerns about increasing Virginia's and America's reliance on nuclear energy are based on the effect of mining for uranium on the environment and on foreign policy, the possibility of an accident within the power plant, risks relating to transportation of radioactive material to and from the plant, the need for foolproof long-lasting waste containment, and the chance for terrorists to take advantage of any of those steps.

To begin, I'd like to address the source of the uranium, as reported on page 292 of the Environmental Impact Statement, section 6-4:

> "Another change is the elimination of the U.S. restrictions on importation of foreign uranium. The economic conditions of the uranium market now and in the foreseeable future favor full utilization of foreign uranium at the expense of the domestic uranium industry. These market conditions have forced the closing of most U.S. uranium mines and mills, substantially reducing the environmental impacts in the U.S. from these activities."

This statement raises two concerns. First, if we build additional facilities at North Anna, we are exacerbating our dependence on foreign fuel, merely replacing oil with uranium. This will not allow us the upper hand we strive to have in foreign policy. Second, the statement says that using foreign sources of uranium substantially reduces the environmental impacts in the United Sates. This means that we are simply shipping environmental problems to other countries for other people to deal with. If the negative environmental impacts of uranium mining are not something we wish to impose on our own citizens, we should not feel comfortable imposing them on other members of the human race. This is callously conveying disrespect for the health and quality of life desired and deserved by all human beings. Additionally, it will lead to another reason for people in other countries to resent the United States of America, creating more antagonism, and therefore more difficulties in foreign policy.

I would also like to address how the Environmental Impact Statement analyses the risk of cancer caused by radiation exposure at North Anna. On page 301 of the draft, in section 6-13, the report covers the assumptions made in calculating the risks:

> "The cancer risk factors, used in this analysis, are from the BEIR-V report, 'Health Effects of Exposure to Low Levels of Ionizing Radiation' (National Research Council 1990). In this report, it is estimated that 'if 100,000 persons of all ages received a whole body dose of 0.1 Gy (10 rad) [roughly equivalent to 10 rem] of gamma radiation in a single brief exposure, about 800 extra cancer deaths would be expected to occur during their remaining lifetimes in addition to the nearly 20,000 cancer deaths that would occur in the absence of radiation.' Therefore, even with a large exposure (i.e., twice the annual dose limit for workers), the cancer mortality would change by less than a percentage point (i.e., from 20% to 20.8%)."

My objection here is not how the calculations were arrived at, but how the results are considered. Granted, less than one percentage point sounds low on paper, but one must consider the size of the population.

E-RIDS = ADM-03

ESP Review Complete
Template = ADM-013

cc = J. Cushing (JXC9)
A. Williamson (AEW1)

Furthermore, there is a huge difference between considering less than one percent when one is thinking about profit margin and when one is considering the number of new cancer cases. Supposing you do have a population of 100,000 people. What sort of justification is it to say, "Well, 20,000 of them are going to get cancer anyway, so what's another 800?" We are talking about 800 additional families suffering from preventable tragedies. In this light, less than one percent is unacceptable. Now, the report did say that this is assuming an amount of radiation that is twice the annual dose limit for workers. However, lets consider that workers will work at the plant for many years. How does that change the radiation exposure and subsequent risk of cancer? I also realize that the plant will not have 100,000 workers. But let's also consider the small possibility that more radiation escapes the plant than we optimistically expect, either because calculations are wrong, or because of a plant malfunction. Then you are dealing with a potential population of much greater than 100,000 people, depending on which direction is downwind. I cannot accept that even a small percent of my neighbors could get cancer or worse so that I can turn on my air conditioner in the summer. Can you?

Let us consider how the waste from the plant is to be stored. I think the term "stored" is much more accurate than "disposed of," considering the half-life of the waste we are dealing with. I would hope that no additional plants would be built until Yucca Mountain has gone from being a potential site for new waste to an approved, ready-for-use site, so we would not be generating additional waste only to find we have nowhere to put it. This is not to say that I think Yucca Mountain is a great solution for our radioactive waste, nor do I have a better suggestion. The EPA notes that Yucca Mountain is on an active seismic region with several volcanic cones and at least thirty-three earthquake faults in the vicinity. With the half life we are dealing with, we are asking our descendants for many generations to come to manage our waste and pay the price if it does leak. I do not want to place that burden on future Americans. Can we really be sure that Yucca Mountain is as sound as we think it is for thousands of years to come? How many other times have we been overconfident in the safety of our technology? DDT and CFC's come to mind as examples of technologies we thought were risk-free but turned out to lead to increased health problems. We must find a different solution to meet Virginia's energy needs, one that does not risk the health of future Americans.

On the topic of waste disposal, a quote from the Environmental Impact Statement caught my eye. On page 303, Section 6.1.1.6, the report states,

> "For high-level and transuranic wastes, the Commission notes that these are to be buried at a repository, such as the candidate repository at Yucca Mountain, and that no release to the environment is expected to be associated with such disposal, although it has been assumed that all of the gaseous and volatile radionuclides contained in the spent fuel are released to the atmosphere before the disposal of the waste."

I am alarmed that volatile radionuclides will be released into the atmosphere as a matter of standard practice.

Finally, I would like to express my concern over creating additional potential targets for terrorists. If we build more nuclear reactions in North Anna, that may increase how attractive it looks to terrorists, especially given its proximity to Washington, DC. Every transport of radioactive waste from North Anna to Yucca Mountain on our nation's highways is an additional opportunity for terrorist action. I am confused by our President's repeated statements that terrorists are considering targets such as nuclear facilities, followed by statements that the future of America's energy needs lies in nuclear energy.

The most patriotic thing our country can do to meet our energy needs is to commit our nation's best minds to developing highly effective renewable energy technologies. This would free us from dependence on other countries for fuel supplies, and would keep our own citizens healthy by reducing air pollution and possible increased radiation exposure. Americans are worth that effort.

Thank you very much for your time and consideration, and thank you for all your hard work on behalf of our nation.

Sincerely,

Lena Lewis

Lena Lewis

RDB received 3/3/05

12/10/04
69 FR 71854

437

February 26, 2005

US Nuclear Regulatory Comm
Attn Michael T. Lesar, Chief
Rules & Directives Branch
Washington, DC 20555-0001

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

H. Paul Bigler
2740 Wilshire Ave SW
Roanoke, VA 24015-3948

SISP Review Complete

Template = ADM-013

501

E-RIDS = ADM-03
Add = J. Cushing (JXC9)
A. Williamson (AEW)

RDB received 3/3/05

12/10/04
69FR 71857
428

February 25, 2005

US Nuclear Regulatory Comm
Attn Michael T. Lesar, Chief
Rules & Directives Branch
Washington, DC 20555-0001

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Sherley Redding
20 Executive Dr
Newport News, VA 23606-2225

SISP Review Complete

Template = ADM-03

E-RFDS = ADM-03
Add = J. Cushing (JXC9)
A. Williamson (AEW1)

RDO received
2/7/05

12/10/04
69FR 71857

Date of Request

429

2/19/05

Chairman: Nils J. Diaz
U.S. Nuclear Regulatory Commission
Washington DC. 20555-0001

I am writing to inform you that I am against Dominion Power obtaining a permit to expand Nuclear Energy Operations in my State of Virginia.

Nuclear Energy is harmful to our environment, the radioactive waste produced by Nuclear Energy is harmful, not only to us but future generations.

I promise to fight Dominion Power, the US Nuclear Regulatory Commission, The Bush Administration--- and all Energy "FAT CATS" in this country from building anymore potentially dangerous and contaminating reactors in the United States. The People will be heard!

I urge you to be wise for future generations & promote Conservation, Solar & Wind alternatives.

Thank you for your Time.

William T. Tresty Jr.

E-RFDS=ADM-03
Add - J. Cushing (JXC9)
A. Williamson (AKW1)

ESP Review Complete

Template - ADM-013

RDB received 3/7/05

2/10/04
69FR 7185 4

430

Feb 20, 2005

Dave M.
Reply please
JV

Dear Mr. Diaz,

My family is opposed to any new nuclear power plants being built for many, many reasons.

Some are — there are less dangerous ways of obtaining power from wind and sun energy, which is ever abundant.

Containment of nuclear waste is a major problem and not a proven factor.

Thank you for your consideration.

Robert Renaud

E-RIDS = ADM-03

SISP Review Complete

Template = ADM-013

504

Add = J. Cushing (JXC9)
A. Williamson (AEW1)

RDB received
3/7/05

Virginia Thull geengur@peoplepc.com (540) 752-4040
63 Skyline Drive Fredericksburg, VA 22406-4035

12/10/04
69 FR 71854

431

February 26, 2005

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration, Mailstop T-6D59
U.S. Nuclear Regulatory Commission,
Washington, DC 20555-0001

Re: North Anna ESP Permit and DEIS

Thank you for the opportunity to comment on the DEIS.

I am writing first because I am very concerned that this ESP process is so disjointed that it is very difficult for the public to follow either the process itself or the actual specific details of the North Anna proceedings. It almost appears to be designed to be confusing.

Second, even if the whole picture were clear and complete, it would only be so based upon today's data, and not the facts, whatever they may be, at the time the decision is made to build the additional facility(s). This makes no sense whatever, especially considering that the entire area around Lake Anna, but especially north towards D.C., is experiencing one of the highest rates of growth in the country. These localities are dealing with growth induced problems and financial crises in health, education and transportation right now, and it does not appear to me that these issues were taken into account by this study, in particular the transportation issue.

Transportation is entirely inadequate for not only the construction phase of the proposed facilities, but certainly in the event of the need for an evacuation. Virginia does not have the funds for any new transportation projects, and is only able to finance maintenance work at this time. Where is the money going to come , plan and build the roads to support the 5,000 construction personnel?

Third, the already deficient water level at Lake Anna appears to have been glossed over and ignored.

Fourth, why are we not allowed to make any comments on the safety and waste issues???

Please do the right thing by the American public, and correct the EIS so that it actually studies the whole picture, and please allow for additional public participation in the process.

Thank-you for your consideration in this matter,

Virginia Thull

Virginia M. Thull
geengur@peoplepc.com

SUNSP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add = J. Cushing (JXC9)
A. Wilkinson (AEW1)

RDB Received
3/7/05

12/10/04
69FR 71854

February 21, 2005

Chief Rules and Directives Branch
Division of Administrative Services
Office of Administration Mailstop T-6D59
U.S. Nuclear Regulatory Commission
Washington DC 20555-0001

432

Re: North Anna ESP Permit and DEIS

Thank you for the opportunity to comment.

I have worked as an environmental analyst and educator. The science behind many sections of the DEIS seems fuzzy. The conclusion of SMALL impacts doesn't logically flow from the discussion and often is unsubstantiated. The policy analysis specifically with regard to regional socio-economic measures is very weak. I request that the DEIS be prepared in accordance with the intent of NEPA and re-issued.

In particular, the treatments of the following areas are inadequate:

1. Roads and transportation – there are already real problems in the region and this project will only make them worse (especially during construction or god-forbid if an evacuation is required). Projects of traffic and impacts generated within the 20-year window of the ESP are not addressed (VTRANS 2025).
2. Life safety – there are no hospitals nearby Lake Anna and none in the adjacent counties of Spotsylvania or Louisa.
3. Water impacts – a defensible water budget is required for any reasonable modeling to be done and for any results to be meaningful.
4. Safety and Terrorism – this is clearly a socioeconomic issue that should be addressed in an EIS given the proximity to large population centers including Washington, D. C.
5. Nuclear waste storage and disposal – we don't seem to have any permanent options yet for existing nuclear waste stockpiles.
6. Government subsidies to the nuclear industry – how much will these kilowatt-hours really cost?

Please re-do this document and give the public the data it needs to make an informed decision on this project.

Sincerely,

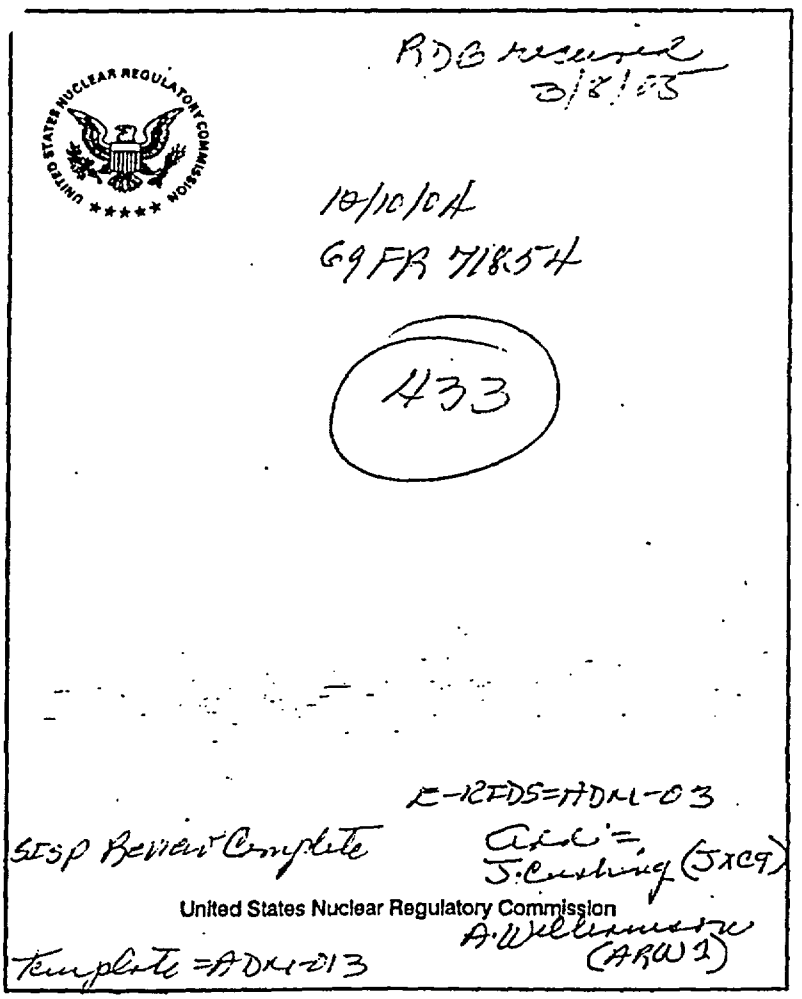
Donna Pienkowski

Donna Pienkowski
6147 Hickory Ridge Road
Spotsylvania, VA 22553

E-RIDS=ADM-03
Add = A. Williamson (AEWI)
J. Cushing (JXC9)

SISP Review Complete
Template = ADM-013

506


RDB received
3/8/05
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69 FR 71854
433
E-RIDS=ADM-03
Stsp Reviewer Complete
Add'l =
J. Cushing (JXC9)
United States Nuclear Regulatory Commission
A. Williamson
(AKW1)
Template =ADM-013

Mrs. Shelly Sitzer
PO Box 7572
Charlottesvle, VA 22906-75

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration
Mailstop T-6D59
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

20555/0001

Ms. Alicia Williamson
U.S. Nuclear Regulatory Commission

Re: Comments on Draft NUREG-1811

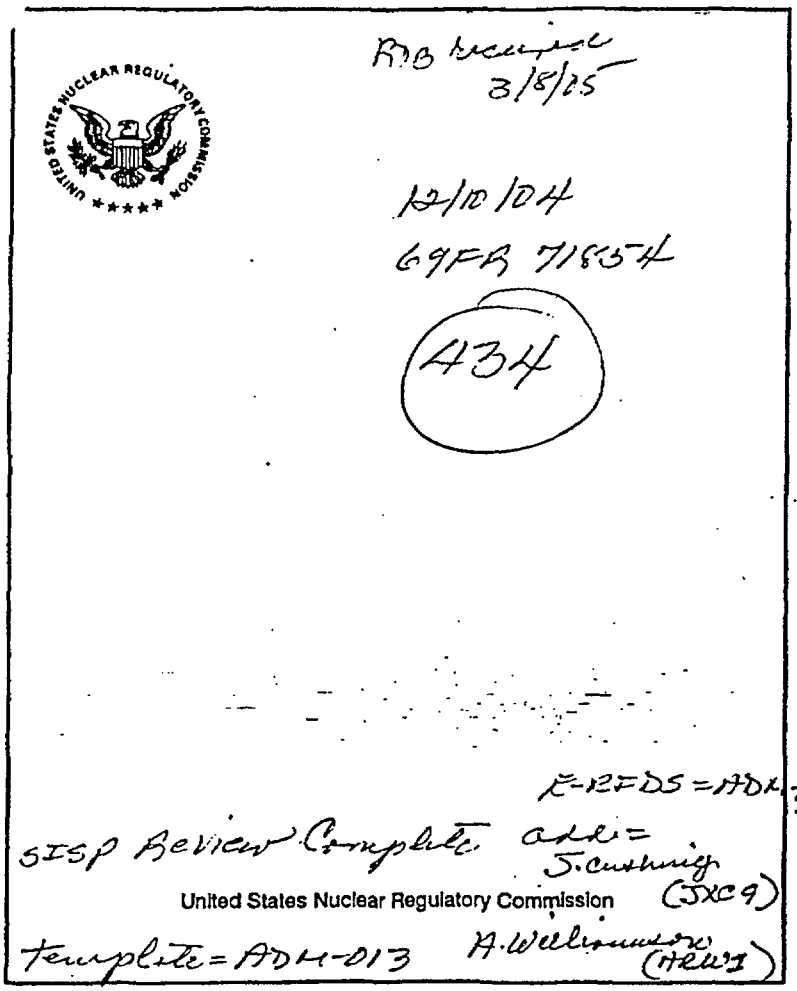
Dear Ms. Williamson:

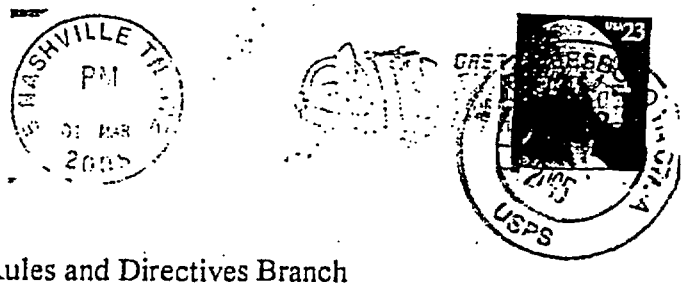
I am writing to OPPOSE granting an Early Site Permit (ESP) to Dominion Resources to build two new reactors at the North Anna nuclear plant in Mineral, VA. The draft Environmental Impact Statement states that construction activities permissible under the ESP may stir up heavy metals and other contaminants in the lake sediment, while details about mitigation measures are murky. Further, other effects on the lake, such as temperature increases and reduced water levels, are not fully analyzed. Finally, questions about the adequacy of current security regulations and performance are ignored, as are issues of waste generation and its safe, permanent isolation.

Too many questions remain unanswered and too many problems remain unsolved for the NRC to grant an ESP.

Sincerely,

Shelly Sitzer
Charlottesville, VA


RIB Received
3/8/05
12/10/04
69FR 71653-4
434
E-RIDS=ADM-03
SISP Review Complete
add=
J. Cushing (JXC9)
United States Nuclear Regulatory Commission
Template=ADM-013
A. Williamson (AEW1)



Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration
Mailstop T-6D59
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Ms. Alicia Williamson
U.S. Nuclear Regulatory Commission

Re: Comments on Draft NUREG-1811

Dear Ms. Williamson:

I am writing to OPPOSE granting an Early Site Permit (ESP) to Dominion Resources to build two new reactors at the North Anna nuclear plant in Mineral, VA. The draft Environmental Impact Statement states that construction activities permissible under the ESP may stir up heavy metals and other contaminants in the lake sediment, while details about mitigation measures are murky. Further, other effects on the lake, such as temperature increases and reduced water levels, are not fully analyzed. Finally, questions about the adequacy of current security regulations and performance are ignored, as are issues of waste generation and its safe, permanent isolation.

Too many questions remain unanswered and too many problems remain unsolved for the NRC to grant an ESP.

Sincerely,

ANNA FITZGERALD

RDB receipt 3/8/05

NUCLEAR ENERGY INSTITUTE

12/10/04
69FR 71854

Adrian P Heymer
DIRECTOR, NEW PLANT DEPLOYMENT NUCLEAR GENERATION DIVISION

435

March 1, 2005

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration, Mailstop T-6D59
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

PROJECT 689

SUBJECT: NEI Comments on Draft Environmental Impact Statement on Dominion Generation's North Anna Early Site Permit Application (69 FR 71854)

This letter provides generic industry comments on the NRC staff's Draft Environmental Impact Statement (DEIS) on Dominion's North Anna Early Site Permit (ESP) application, as requested in the *Federal Register* notice.

In general, the North Anna ESP DEIS provides a thorough evaluation and well founded conclusions on the Environmental Report provided as part of the Dominion ESP application. The evaluations and conclusions are consistent with the requirements of NEPA and 10 CFR Part 51.

There is one major generic concern, the finality of matters reviewed and resolved at the ESP. This is the subject of ongoing discussion with the NRC staff and is described in NEI's February 10, 2005, letter to Dr. William Beckner (enclosed). An ESP and a future combined license (COL) referencing the ESP are "connected" federal actions within the NEPA framework. This means that once reviewed for ESP, an environmental issue need not be reviewed again at the COL stage. Mirroring the intent of connected federal actions within environmental regulations are the finality provisions of 10 CFR 52.39. These finality provisions state that in a COL review, the NRC shall "treat as resolved" those matters in that were resolved in the ESP.

We also have one generic comment concerning identification of parameters used in the environmental review. The NRC staff has provided an ESP template indicating

E-RIDS = ADM-03
Add = J. Cushing (JXC9)
A. Williamson (AKW9)

ESP Review Complete

1776 I STREET, NW SUITE 400 WASHINGTON, DC 20006 PHONE 202.739.8000 FAX 202.785.4019 www.nei.org

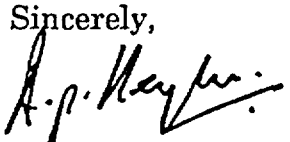
511

Template = ADM-013

that the parameters that are used in the Environmental Report and that form the basis for the EIS will be identified (listed) in the ESP. Presently, these parameters are scattered throughout the EIS making it difficult to determine which parameters the ESP applicant should expect to be identified in its permit. We recommend that the North Anna EIS and future DEISs include a tabulation of the parameters used in support of the staff's environmental reviews for ESP.

If you have any questions about these comments, please contact Russ Bell (202-739-8087, rjb@nei.org) or me (202-739-8094, aph@nei.org).

Sincerely,



Adrian Heymer

Enclosure: (NEI letter to Dr. William D. Beckner, dated February 10, 2005)

c: Dr. William D. Beckner, NRC
Mr. Mike Scott, NRC
Mr. John Segala, NRC

NUCLEAR ENERGY INSTITUTE

Adrian P Heymer
DIRECTOR, NEW PLANT
DEPLOYMENT NUCLEAR
GENERATION DIVISION

February 10, 2005

Dr. William D. Beckner
New, Research and Test Reactor Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Project 689

Dear Dr. Beckner,

This letter provides the industry feedback and position on the extent of NRC environmental reviews at the combined license (COL) stage when an applicant references an Early Site Permit (ESP), as requested in the NRC-industry meeting on January 18, 2005. The enclosed white paper, "Environmental Review at the COL Stage of Nuclear Plant Licensing," provides the basis for the industry position that there should be no re-review at COL of environmental issues that were evaluated at ESP.

NEI disagrees with NRC staff statements in the January 18, 2005, meeting that environmental topics resolved in an ESP are subject to re-review at COL to determine whether new and significant information exists. These NRC staff statements are contrary to the finality provisions of Part 52.

The Part 52 framework provides finality for previously resolved issues that is fully consistent with the requirements of NEPA. Under NEPA, ESP and COL are "connected actions" because the Environmental Impact Statement (EIS) prepared for ESP considers the potential environmental impacts of constructing and operating one or more new nuclear plants at the proposed site. There is no requirement for NRC to re-review previously resolved issues or to prepare an EIS for a subsequent (COL) proceeding regarding impacts that were considered in the ESP proceeding.

The industry agrees that COL applications must address "any other significant environmental issue not considered in any previous proceeding" and that these issues would be subject to NRC review during the COL proceedings. These would include issues deferred from the ESP stage to the COL stage and newly identified significant issues. Other environmental issues would be addressed for purposes of

1776 I STREET, NW SUITE 400 WASHINGTON, DC 20 513 PHONE 202.739.8094 FAX 202.785.1898 aph@nei.org

the COL by incorporating the ESP by reference in the COL application and may only be re-opened in accordance with 10 CFR 52.39, or by a waiver of NRC rules.

The regulations clearly state that re-review of environmental matters reviewed and closed in the ESP is not allowed. Section 52.39 states, "the Commission shall treat as resolved" those matters resolved in the ESP proceeding. Moreover, Section 52.89 states:

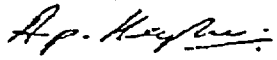
> "If the application references an early site permit or a certified standard design, the environmental review must focus on whether the design of the facility falls within the parameters specified in the early site permit and any other significant environmental issue not considered in any previous proceeding on the site or the design."

And, 10 CFR 52.79 states:

> "...if the [COL] application references an early site permit, the application need not contain information or analyses submitted to the Commission in connection with the early site permit, but must contain, in addition to the information and analyses otherwise required, information sufficient to demonstrate that the design of the facility falls within the parameters specified in the early site permit, and to resolve any other significant environmental issue not considered in any previous proceeding on the site or the design."

We ask for your prompt consideration of this information because this is a critical issue for maintaining industry and third party confidence in the NRC's Part 52 licensing process. If you have any questions regarding this letter, please contact me (202-739-8094, aph@nei.org) or Russ Bell (202-739-8087, rjb@nei.org).

Sincerely,



Adrian Heymer

Enclosure

c: Mike Scott, NRC/NRC

Environmental Review Required at Combined License Stage of Nuclear Power Plant Licensing

This paper examines the scope of environmental review in connection with an application for a combined construction permit and operating license (COL) when that application references an early site permit (ESP) for the site. As explained in this paper, Part 52 requires that all issues resolved in an ESP proceeding shall be treated as resolved in a COL proceeding, and environmental review at the COL stage (when an ESP is referenced) is therefore limited to a showing that the facility design falls within the parameters specified in the ESP and to consideration of other significant environmental issues, if any, not considered in the previous proceedings. As discussed below, this regulatory approach is entirely consistent with the National Environmental Policy Act (NEPA).

The NEPA Framework

An ESP and a COL are "connected actions," which, under NEPA case law and consistent with Council on Environmental Quality (CEQ) regulations, are to be addressed by the NRC in a single environmental impact statement (EIS). There is no requirement for any agency to prepare a new EIS for the latter of two connected actions that were previously evaluated together in a single EIS. E.g., Village of Grand View v. Skinner, 947 F.2d 651, 656-57 (2d Cir. 1991). There may, however, be a need to prepare a supplement to the EIS at the COL stage if "new information [regarding the action] shows that the remaining action will affect the quality of the environment 'in a significant manner or to a significant extent not already considered.'" National Committee for the New River, Inc. v. FERC, 373 F.3d 1323, 1330 (D.C. Cir. 2004) (quoting Marsh v. Oregon Natural Resources Council, 490 U.S. 360, 374 (1989)); see 10 C.F.R. § 51.92(a). Many U.S. Courts of Appeal decisions have held that "a supplemental EIS is only required where new information provides a seriously different picture of the environmental landscape." Id. (emphasis in original, internal quotations omitted) (quoting City of Olmsted Falls v. FAA, 292 F.3d 261, 269 (D.C. Cir. 2002)).[1] "To require otherwise would render agency decisionmaking intractable, always awaiting updated information only to find the new information outdated by the time a decision is made." Marsh, 490 U.S. at 373. Thus, if the NRC addresses environmental issues in the EIS for an ESP, there is no need under NEPA for NRC to re-address the same issues in the COL proceeding.

[1] See also Sierra Club v. U.S. Army Corps of Engineers, 295 F.3d 1209, 1215-16 (11th Cir. 2002) (significant impact not previously covered); South Trenton Residents Against 29 v. FHA, 176 F.3d 658, 663 (3d Cir. 1999) ("seriously different picture of the environmental impact"); Hughes River Watershed Conservancy v. Glickman, 81 F.3d 437, 443 (4th Cir. 1996) (same); Sierra Club v. Froehlke, 816 F.2d 205, 210 (5th Cir. 1987) (same).

The Intent of the NRC Regulations

10 CFR Part 52 is explicit regarding the Commission's intent to resolve environmental issues at the ESP stage. *See, e.g.*, 54 Fed. Reg. 15,372, 15373 (1989),[2] describing one of the aims of the Part 52 rules as the "early resolution of safety and environmental issues in licensing proceedings." (emphasis added) The clear intent of the Part 52 regulations is to not reconsider environmental issues in a COL application where that application references an ESP for which those environmental issues have previously been assessed.

The Framework of the NRC Regulations

Consistent with this intent, Section 52.39 provides that in making findings necessary for the issuance of a COL (which includes any findings required by NEPA), the Commission shall "treat as resolved" (with limited exceptions) those matters resolved in a proceeding on the ESP application. 10 CFR 52.39(a)(2).[3] Section 52.39(a)(2) provides that issues previously resolved in an ESP proceeding may only be reopened in the following respects: (i) a contention may be filed alleging that a reactor does not fit within one or more site parameters in the ESP; (ii) a petition (supported by NRC or permit-holder documentation or admissible evidence) may be filed alleging that the site does not satisfy the acceptance criteria of the ESP; or (iii) a Section 2.206 enforcement petition may be filed alleging that the terms and conditions of the ESP must be modified. Of course, a party in an adjudicatory proceeding may request the Commission to waive NRC rules, in accordance with 10 CFR 2.335, on the basis that "special circumstances with respect to the subject matter of the particular proceeding are such that the application of the rule or regulation (or a provision of it) would not serve the purpose for which the rule or regulation was adopted."

Because an ESP proceeding includes the preparation of an environmental impact statement addressing the environmental impacts of reactor construction and operation (10 CFR 52.18), it follows directly that the environmental issues resolved in that EIS must, in accordance with 10 CFR 52.39, be treated as resolved in the COL proceeding. Reflecting the Commission's clear intent not to revisit previously resolved issues, the environmental information that an COL applicant must provide is limited to "information sufficient to demonstrate that the design of the facility falls within the parameters specified in the [ESP], and to resolve any other significant environmental issue not considered in any previous proceeding on the site or the design." 10 CFR 52.79(a)(1). Similarly, the NRC staff's environmental review of a COL application referencing an ESP "must focus on whether the design of the facility falls within the parameters specified in the [ESP] and any other

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[2] Early Site Permits; Standard Design Certifications; and Combined Licenses for Nuclear Power Reactors, Final Rule.

[3] Section 52.63(a)(4) provides similarly for treating as resolved any matters resolved in connection with the issuance or renewal of a reactor design certification.

significant environmental issue not considered in any previous proceeding on the site or the design." 10 CFR 52.89. These provisions define the scope of environmental review at the COL stage, and this scope may not be exceeded, absent the Commission granting a waiver under Section 2.335.

Because review of previously resolved issues is neither intended nor required, an applicant referencing an ESP is not required to submit an Environmental Report (ER).[4] Similarly, the Part 52 regulations do not require the NRC staff to prepare an EIS at the COL stage when one was prepared for an ESP. In proposing the Part 52 regulations, the Commission explained that "only an environmental assessment need be prepared in connection with the application for a combined license." 53 Fed. Reg. at 32,066. Presumably, if this environmental assessment determines that issuing the COL would affect the quality of the environment in a significant manner or to a significant extent not already considered, only then would the staff prepare an EIS supplement. Such an EIS supplement would be limited to the matters not previously considered.

In sum, regarding environmental matters in a COL proceeding in which an ESP is referenced, the Commission has provided that a COL applicant must demonstrate and the staff must confirm that the reactor falls within the parameters specified in the ESP. Intervenors may challenge that demonstration in the course of the COL proceeding. The applicant and the staff must also assess any significant issues not previously addressed in the ESP or the design certification proceedings. Intervenors may challenge those assessments in the COL proceeding as well.

Scope of Environmental Information in a COL Application

The COL applicant is required to submit environmental information that:

- Shows that the facility design falls within the parameters specified in the ESP, or evaluate the environmental effects of any design features that are not bounded;
- Addresses any environmental issues that were deferred from the ESP EIS; and

[4] See 10 CFR 52.79(a)(2) (requiring an ER only when an ESP application is not referenced). See also 53 Fed. Reg. 32,060, 32,065 (1988) (notice of proposed rule explaining that "an environmental report is not required if a pre-approved site is proposed for the facility."). The fact that a COL applicant referencing an ESP is not required to submit an ER underscores once more the Commission's intent not to revisit the environmental review performed at the ESP stage. A COL applicant must provide information regarding environmental matters that were not resolved at the ESP stage, as required by 10 CFR 52.79(a)(1), but the applicant is not required to provide updated information for all matters specified for an ER by Part 51.

- Addresses any other significant environmental issues[5] that were not considered in a previous proceeding.

The NRC staff would then consider this information in and prepare an Environmental Assessment (EA). If the NRC staff determines that any design features beyond the bounds of the ESP are not significant in that they do not "present a seriously different picture of the environmental impact of the proposed project from what was previously envisioned," South Trenton Residents, 176 F.3d at 663, the staff would document that determination in the EA. If the NRC staff determines that there are design features exceeding the parameters specified in the ESP that do present a significantly different environmental impact, or if there are significant environmental issues that were deferred from the ESP EIS or otherwise not considered, the NRC staff would then prepare an EIS Supplement, but limited solely to those matters. The federal courts have concluded that under NEPA, the significance of new information with respect to the need to prepare a supplement to an EIS depends on its bearing on the anticipated environmental impacts of the proposed action, not whether it is significant or interesting in some other context. South Trenton Residents, 176 F.3d at 664; see National Committee for the New River, 373 F.3d at 1330 (information not significant unless it "significantly transform[s] the nature of the environmental issues" discussed in the EIS). Therefore, the NRC's evaluation of new issues that were not previously addressed should remain focused on the environmental impacts of the granting of the COL and not the significance of the issues in any other respect.

Reconsideration of Impacts Previously Evaluated in the ESP EIS

In general, a COL applicant is not required to collect or review new information about the site environs or update the information in the ESP Environmental Report to reflect new environmental studies or data. However, in preparing its COL application, a COL applicant may become aware of significant new information that materially and adversely affects conclusions on environmental impacts previously considered in the ESP. In this event, it would be appropriate for the applicant to inform the NRC of the significant new information. In particular, an applicant would be expected to identify and provide its evaluation of new information that is determined to change a previously evaluated environmental impact level from "small" to "moderate" or "large," or from "moderate" to "large."[6] The NRC staff

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[5] As used in the NRC regulations, environmental "issues" refers to the types of environmental impacts that must be considered in an EIS. See, e.g., 10 CFR Part 51, App. B, Table B-1 (identifying the "issues" relevant to a license renewal proceeding).

[6] These terms are defined as follows in Table B-1 of 10 CFR Part 51:

- SMALL--For the issue, environmental effects are not detectable or are so minor that they will neither destabilize nor noticeably alter any important attribute of the resource. For the purposes of assessing radiological impacts, the Commission has concluded that those impacts that do not exceed permissible levels in the Commission's regulations are considered small as the term is used in this table.

would then consider this information, and if it determines that there are changes to previously established environmental impact levels, it would supplement the ESP-stage EIS.[7] Such matters would become part of the scope of the COL proceeding and thus be subject to hearing. New information determined by the COL applicant to not alter a previously determined environmental impact level would not be included in the scope of the COL application.

As discussed above, environmental issues considered and resolved in a referenced ESP proceeding are not open to re-review by the NRC staff at the COL stage. Section 52.39(a)(1) explicitly states that such issues are to be treated as resolved. The NRC staff would reconsider previously resolved environmental issues only 1) in answer to a petition filed under Section 52.39(a)(2)(ii), or 2) if, as discussed above, the COL applicant identifies significant new information that adversely affects conclusions on environmental impacts previously considered in the ESP.

Contentions and Petitions Under Section 52.39(a)(2)

Section 52.39(a)(2) allows only three exceptions to the finality of issues resolved in an ESP and it specifies how such issues would be handled in connection with a COL proceeding:

- As discussed above, a COL application must contain sufficient information to show that the facility design falls within the parameters specified in the ESP, or provide an evaluation of the environmental effects of any design features that are not bounded. Per Section 52.39(a)(2)(i), a contention that a reactor (facility design) does not fit within one or more of the site parameters included in the ESP would be litigated in the same manner as other issues material to the proceeding.

- If a party has new information about the site that it believes indicates that the site is no longer in compliance with the terms of the ESP, Section 52.39(a)(2)(ii) provides for petitioning the Commission to admit the new information into the COL proceeding and re-open one or more issues previously resolved in an ESP. The petition must include or clearly reference official NRC documents, documents prepared by or for the permit holder, or evidence admissible in a Part 2, Subpart G, proceeding that show, *prima facie*, that the acceptance criteria have not been met. After consideration of applicant and NRC staff responses to the petition, the Commission may admit the contention.

- MODERATE--For the issue, environmental effects are sufficient to alter noticeably, but not to destabilize, important attributes of the resource.
- LARGE--For the issue, environmental effects are clearly noticeable and are sufficient to destabilize important attributes of the resource

[7] In license renewal proceedings, the Commission has indicated that the NRC staff should ask the Commission for a waiver in order to address previously resolved environmental issues. See SECY-93-032 at 3-4; 61 Fed. Reg. 28467, 28470 (1996)

In order to clarify the applicability of this section to environmental issues, it would be appropriate for the NRC to specify the impact levels of environmental issues evaluated in the ESP-stage EIS as acceptance criteria in the early site permit (e.g., the environmental impact levels indicated in summary Tables 4-1 and 5-21 of the North Anna Draft EIS – NUREG-1811).

Petitions under Section 52.39(a)(2)(ii) would be granted if the Commission concluded that the new information raises a genuine issue of material fact (i.e., a substantial matter not addressed in the COL application that could, upon thorough evaluation, potentially result in a change to a previously evaluated environmental impact level from "small" to "moderate" or "large," or from "moderate" to "large"). When considering such petitions, the Commission would also consider whether the "new" information was, in fact, available prior to the preparation of the ESP EIS.[8] In this way, Section 52.39(a)(2)(ii) would allow a contention where there is *prima facie* evidence that impact levels are changed, while preserving the finality of previously resolved issues in all other cases.

- Section 52.39(a)(2)(iii) provides for petitions under Section 2.206 to modify the terms and conditions of the ESP.

In addition, as identified above, a party in an adjudicatory proceeding may request the Commission to waive the finality provisions of Section 52.39(a)(2) and 52.89, in accordance with 10 CFR 2.335, on the basis that "special circumstances [exist] such that the application of the rule or regulation (or a provision of it) would not serve the purpose for which the rule or regulation was adopted." This waiver request approach is consistent with the approach followed in license renewal proceedings where the NRC staff (or an intervenor) is required to apply to the Commission for a waiver before any Category 1 issue (i.e., any issue previously resolved generically) can be reconsidered, based on significant and new information. See SECY-93-032 at 3-4; 61 Fed. Reg. 28,467, 28,470 (1996).[9]

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[8] Although it appears to be a minority position among the federal courts, the NRC might take the position that information available before the preparation of the ESP EIS but not submitted until afterwards is unduly late and does not require the agency to go back and re-evaluate previous determinations in the ESP EIS. See Roanoke River Basin Assoc. v. Hudson, 940 F.2d 58, 64 (4th Cir. 1991) ("An issue never presented to [an agency] 'must not be made the basis for overturning a decision properly made after an otherwise exhaustive proceeding.'") (quoting Vermont Yankee Nuclear Power Corp. v. NRDC, 435 U.S. 519, 558 (1976)); Hughes River Watershed Conservancy, 81 F.3d at 451 (Hall, J., dissenting); Oregon Natural Resources Council v. Marsh, 52 F.3d 1485, 1495 (9th Cir. 1995) (Rymer, J., dissenting); c.f. Apache Survival Coalition v. United States, 21 F.3d 895, 912 (9th Cir. 1994) (denying on the grounds of laches claim under National Historical Preservation Act known of by plaintiffs but not raised until after completion of NHPA process).

[9] See also Highway J Citizens Group v. Mineta, 349 F.3d 938, 959-60 (7th Cir. 2003) (agency-requested expert analysis); Hodges v. Abraham, 300 F.3d 442, 446, 448 (4th Cir. 2002) (agency record of decision based on review of previous NEPA documents); Idaho Sporting Congress v. Alexander,

Except as provided by Section 52.39(a)(2)(ii) as discussed above, there must be no reconsideration of environmental impacts evaluated in the ESP EIS without the granting by the Commission of a waiver under 10 CFR 2.335 of Sections 52.39(a)(2) and 52.89. To allow reconsideration of impacts without satisfying the petition requirements of Section 52.39(a)(2)(ii) or the waiver requirements of Section 2.335 would cause the finality provisions of Part 52 to have no regulatory effect, because any intervenor would be able to litigate a previously evaluated impact simply by alleging that there is new information that could affect the prior conclusions. That would be contrary to the Commission's intent in promulgating Part 52 and unnecessary under NEPA. Indeed, the federal courts have stated that were public participation required on the decision whether to prepare a supplemental EIS, that threshold decision "would become as burdensome as preparing the supplemental EIS itself, and the continuing duty to gather and evaluate new information . . . could prolong NEPA review beyond reasonable limits." Friends of the Clearwater v. Dombeck, 222 F.3d at 560 (9th Cir. 2000). Therefore, it is appropriate for the Commission to grant a waiver request only upon concluding that the new information would show that that matter would have a seriously different impact on the environment than what was considered in the ESP EIS.

Conclusion

The Commission has established a specific scope of environmental review for COL applications referencing an ESP that requires treating all environmental matters addressed in the ESP proceeding as resolved. This approach, which fully complies with NEPA, is essential to effectuate the Commission's intent and to preserve the ESP process as it was intended – as a process that allows for site suitability and environmental issues to be conclusively resolved in advance of a combined license proceeding and plant construction.

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222 F.3d 562, 566 (9th Cir. 2000) (agency supplemental information report); Price Road Neighborhood Assoc. v. DOT, 113 F.3d 1505, 1509-10 (9th Cir. 1997) (assessments by other agencies or agency's own "statement of explanation"); Marsh, 490 U.S. at 383-85 (agency supplemental information report based on agency-requested expert analysis).

RDB - received
3/8/05

March 2, 2005

12/10/04
69FR 71857

US Nuclear Regulatory Comm
Attn: Michael T. Lesar, Chief
Rules & Directives Branch
Washington, DC 20555-0001

436

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,
David Lenehan

David Lenehan
3837 Peakland Pl Apt 6
Lynchburg, VA 24503-2045

E-RIDS=ADM-03
Cc = J. Anderson (OEDO)
A. Williamson (ARW1)

SISP Review Complete

Template=ADM-013

RDB received 3/6/05



Buyers Up • Congress Watch • Critical Mass • Global Trade Watch • Health Research Group • Litigation Group
Joan Claybrook, President

12/10/04
69 FR 71857

March 1, 2005

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

Re: Comments on the Draft Environmental Impact Statement for an Early Site Permit (ESP) at the North Anna ESP Site (NUREG-1811)

To Whom It May Concern:

Enclosed you will find the comments of Public Citizen on the NRC's Draft Environmental Impact Statement (Draft EIS) for the Early Site Permit (ESP) at the North Anna ESP Site.

Public Citizen, in conjunction with the Nuclear Information and Resource Service (NIRS) and the Blue Ridge Environmental League (BREDL), has been admitted as a party to the licensing proceeding for the North Anna ESP. As a formal participant with standing in this proceeding, we hope that our comments and recommendations on the Draft EIS are considered seriously and taken into account before the NRC issues its Final EIS on the North Anna ESP.

Please enter these comments into the official record on this proceeding.

Sincerely,

Michele Boyd

Michele Boyd
Legislative Director, Energy Program

Joseph P. Malherek

Joseph P. Malherek
Policy Analyst, Energy Program

[Enclosure]

E-RIDS = ADM-03
Add = J. Cushing (JXC9)
A. Williamson (AKW1)

ESP Review Complete

215 Pennsylvania Ave SE • Washin 523)2) 546-4996 • www.citizen.org

Template = ADM-013

Overall comments

Arbitrary Distinction between ESP and COL

The purpose of an Early Site Permit (ESP) process is supposedly to "assess whether a proposed site is suitable should the applicant decide to pursue a CP [construction permit] or COL [combined license]" (DEIS, page xxi). Yet, this Draft Environmental Impact Statement (DEIS) fails to consider or to fully acknowledge numerous environmental issues that indicate that the North Anna site is not suitable for additional reactors. It does not appear that the ESP really indicates anything about site suitability when analyses to determine environmental impacts or decisions on how to mitigate those impacts are put off to the COL stage or are to be made by the state after the NRC has already granted the ESP.

Moreover, the need for a "Site Redress Plan" (Section 4.11), which addresses the activities required to return the North Anna site to its present state if infrastructure construction activities are truncated. and the breadth of the facilities that can be constructed under the ESP (listed on page 4-46 of the DEIS) is an indication of the bizarre and arbitrary division between the ESP and the COL processes. Clearly, the specific site and the specific reactor are one in the same project, and the division into the ESP and COL licensing process is completely arbitrary.

Dominion claims that it has made no decisions about building new reactors at North Anna.[1] Yet, an ESP is a "partial construction permit,"[2] meaning that Dominion would be allowed to carry out large-scale construction operations, including site clearing, stream clearing, and excavation, as well as construction of permanent foundations, intake structures, and outfall structures.[3] Moreover, Dominion is leading a consortium that plans to apply for a combined construction and operation license (COL) in 2008. Thus, if granted an ESP, Dominion could be permitted to begin an extensive construction operation while numerous, important issues, such as the need for power and the indefinite storage of additional waste onsite, have not been addressed. Simply declaring that NRC is not required to look at these issues does not make them go away.

Water Resources

Inadequate data and evaluation

The DEIS does not sufficiently address whether there is an adequate water supply in Lake Anna for the operation of another once-through reactor. In fact, the necessary in-depth analyses to determine the impacts on Lake Anna or to mitigate those impacts are put off to the COL stage or are to be determined by the Commonwealth of Virginia at a later date – after the NRC has already granted the ESP.

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[1] Public Statement by Dominion at the public hearing on the DEIS for North Anna ESP. Rusty Dennen, "NRC hearing airs opinions," *Fredericksburg Free Lance-Star*, February 20, 2005.
[2] 10 CFR Part 52
[3] 10 CFR 50.10(c)(1)

For example, according to the DEIS, "because of the limited inflow data, it is not possible to create a reliable water budget for Lake Anna directly from inflow and discharge measurements" (page 2-21, line 31). Nor have water velocity measurements within the lake been recorded. Yet, the DEIS makes it clear that these data are "important for both understanding the hydrodynamics of the lake and to calibrate numerical models of fluid and heat transport process in the lake" (page 2-22, line 2). In place of velocity measurements, NRC Staff estimated the inflow using data from an adjacent drainage basin and outflow based on the operating rules for the Lake Anna Dam. NRC should require Dominion to provide the necessary temperature and velocity measurements for the Final EIS, and not wait until the COL stage (page 5-7, line 19). With such inadequate data about the lake's hydrology, how can NRC Staff conclude that the hydrological impacts of another once-through reactor on the lake will be "small" (page 5-7, line 18)?

Reduced lake levels (Sec. 5.3)
The two existing reactors on Lake Anna withdraw 1.9 million gallons of water per minute. While most of the water that is withdrawn from Lake Anna is returned as hot water in the southern portion of the lake, the Draft EIS does not state the consumptive use – how much water is lost from evaporation – of the existing reactors. This information is crucial for understanding the additional impact from the two proposed reactors and should be explicitly provided in the Final EIS.

The proposed once-through reactor would withdraw another 1.14 million gallons of water per minute, and would result in an additional 11,700 gallons of water lost per minute (adding another 1% to the evaporative losses). Even a several percent loss of water can have a large impact on the lake. According to the Draft EIS, "even making normal minimum releases of 1.1 m^3/s (40 cfs) from Lake Anna will result in deficits during July, August, and September" (page 5-4, line 15). In drought years, the rate of evaporation and the reduced flow into the lake would have an even more serious impact on both the aquatic life in the lake and on the people living around the lake. In the 2002 drought, the water level dropped to 245 feet above mean sea level, which is 5 feet lower than normal. Boats could not be launched from ramps on the lake, and the backyards of homes around the lake were mudflats. The impact on property values from increased periods of lower lake levels should be analyzed in the Final EIS.

According to the Draft EIS, the two existing reactors must be shut down when the water decreases below 244 feet above mean sea level, because the water level would become too low for the intake pipe. Had a third once-through unit been operating in October 2002, the lake level would have dropped to 243.4 feet above mean sea level and the reactor would have had to be shut down. In its application, Dominion has asked to allow the proposed third reactor to operate until the lake level drops down to 242 feet above mean sea level. At the February 23, 2005 meeting between NRC and Dominion, Dominion stated that it has lowered the intakes for Units 1 and 2. Please indicate how Dominion has modified the intake pipes in the Draft EIS. Does Dominion intend to request that the shutoff point for the existing reactors be lowered to 242 feet above mean sea level?

The NRC Staff does not oppose the proposal of lowering the shutdown point for Unit 3, because the water level decreases slowly and thus "the facility would have adequate time to prepare for any shutdown caused by low lake elevations" (page 5-7, line 7). Yet, the NRC Staff acknowledges that "operation of Unit 3 would increase the duration of periods during drought conditions when the Lake Level Contingency Plan would be applied" (page 5-9, line 34). The Final EIS should include a full analysis of the impacts on the lake and downstream of lowering the level at which the two existing reactors, in addition to the proposed Unit 3, must be shut down. Please justify why lowering the shutoff point would not further increase the impacts on the lake, as well as downstream by lengthening the period of time of low-flow from the dam.

Information and analyses on "operational practices and procedures" for mitigating hydrological impacts (page 5-7, line 10) is crucial for determining whether the impacts can be minimized and should be an integral part of the Final EIS:

Increased temperature in Lake Anna (Secs. 5.4.2.4 and 5.4.2.5)

The addition of another once-through reactor will increase the temperature of Lake Anna, which will affect the striped bass, one of the most thermally-sensitive fish species in the lake. Striped bass prefer temperatures between 65 and 70°F and avoid temperatures above 77-81°F (DEIS, page 5-27, Table 5-7). According to Dominion's models, the "maximum daily surface temperature" near Thurman Island would reach 95.1°F (DEIS, page 5-28, line 4). The "maximum daily surface temperature," however, is calculated as an average of the upper 28 feet of the water column. This ignores the temperature gradient, especially in the lower parts of the first 28 feet water column where the striped bass reside. Striped bass are also sensitive the level of dissolved oxygen in the water, but no dissolved oxygen data is presented in the Draft EIS. The selection of temperature and dissolved oxygen is a balancing act for striped bass. In order to make a real assessment of the impact of additional reactors on the striped bass, vertical profiles of temperature and dissolved oxygen within the upper 28 feet of the water column and need to be provided in the Final EIS.

The Virginia Department of Game and Inland Fisheries, which has stocked striped bass annually in the lake since 1972, considers the current striped bass habitat "tenuous." Although the NRC Staff conclude that the striped bass will be forced "up-lake into areas that provide suitable habitat" for "a three-to-four month period in summer and early fall" (DEIS, page 5-31, line 3), no data was presented that shows that suitable habitat exists in the other areas of the lake. This data should be included in the Final EIS.

If adult striped bass are forced to move to marginal habitat in the northern part of the lake, they could be prevented from feeding normally. Spatial segregation from their forage base and increased metabolic rates could cause loss of condition or starvation. The NRC Staff concludes that the problem can be mitigated by stocking more fish or stocking larger fish. But larger fish are known to be affected by increased temperature, and are often the first to suffer summer "die-offs." While more fish can be stocked, the potential for large fish greater than 10 lbs (or maybe even fish greater than 6 lbs) is greatly reduced with increased temperatures. It would also be very expensive to

significantly increase the annual stock, and Virginia taxpayers should not be held financially responsible. A cost analysis of the stocking proposals should be included in the Final EIS.

Table 5-7 on page 5-27 does not explain why there are two rows of numbers for bluegill and large-mouth bass. According to a similar table in Dominion's ER (Table 5.3-22, page 3.5.91), the two rows are from different sources. Please clarify this in the Final EIS.

Finally, it should not be necessary to refer to Dominion's Environmental Report in order to make sense of the EIS; the relevant temperature modeling tables should be included in the Final EIS. Please also indicate whether (and if so, how) NRC Staff independently verified Dominion's modeling results.

Reduced flow downstream (Sec 5.3)

Hot water discharged into the lake increases evaporation and thus decreases the amount of water available downstream of the North Anna Dam. In drought years, the amount of water available for downstream use would decrease even further, because there would be significantly less water draining into the lake and higher rates of evaporation. While the minimum flow rate during drought periods is limited to 20 cubic feet per second (20 cfs), an additional once-through reactor would increase the frequency and duration of the low-flow periods from the North Anna Dam. The duration of the low-flow periods (20 cfs) would increase from 5.8 percent to 11.8 percent of the time (ER, Part 3, Table 5.2-3, page 3-5-12). The lowest flow rate at the North Anna dam, which releases only 5.4% of the natural flow, is considered as "severe degradation" according to the Tennant method for flow recommendations.[4] This evaluation should be acknowledged in the Final EIS.

Since there is less precipitation in July, August, and September, the low-flow period is likely to occur during these months. According the NRC Staff, the reduction in water available to be released from the dam will be another "unavoidable adverse impact" (DEIS, page 10-7, Table 10-2), but it would be avoidable if the proposed third reactor was required to have a dry cooling tower. This option should be evaluated in the Final EIS.

According to the Virginia Department of Environmental Quality, another reactor will mean "nearly perennial condition of severe degradation" every fall. Dominion's own model shows that the minimum flow (20 cfs) is expected to occur 10 years out of the 25-year modeling period with a third reactor. With the two existing units, minimum flow (20 cfs) is predicted in only 3 years out of the 25-year modeling period. This will have a serious impact on the downstream aquatic life, as well as increase conflicts over water use by downstream counties in the future. Yet, there is no discussion of how the increased occurrence of minimum discharge will affect on living organisms downstream. For example, a full evaluation of the potential impacts of reduced or variable discharge on the life history stages of the native Pamunkey River striped bass population is warranted, especially due to the fact that the Pamunkey River population is one of the

[4] Memo from Joseph P. Hassell to Ellie Irons (Virginia Department of Environmental Quality), January 15, 2004, pages 2-3.

healthiest populations in the Chesapeake Bay ecosystem and is being used for propagation for Chesapeake Bay restoration efforts. The impacts of extended periods of low-flow downstream should be fully analyzed in the Final EIS as an integral part of determining site suitability, rather than simply punted to the Commonwealth of Virginia to address after the ESP decision is made.

Increased fish mortality at intake pipes (Sec. 5.4.2)
Fish and other aquatic life can be killed when caught on the screen of the intake pipe or, for smaller organisms, forced through the intake pipe into cooling water system. With an additional reactor, the number of fish caught, or "impinged," on the mesh screen of the intake pipe would increase by 230%. The number of gizzard shad, the major forage fish, and the number of striped bass killed by impingement would both double. The number of entrained fish larvae would also double, 63% of which would be gizzard shad. The Final EIS should acknowledge that more than doubling the number of entrained larvae would violate the Clean Water Act, which requires the use of best available technology.

Moreover, it is crucial to consider the size and age distributions of the impinged fish in order to understand the impact on the structure and viability of the population. This information should be included in the Final EIS.

The NRC Staff conclude that, because the fish impinged and entrained "most frequently are prolific and exhibit a high reproductive potential, and natural responses of the fish population occur to offset losses," (DEIS, page 5-21, line 11 and page 5-25, line 14) the impacts of impingement and entrainment will be "small." This is nearly word-for-word the conclusion that Dominion provided the NRC regarding impingement in its application (ER, page 3-5-45). In fact, the entire sections on impingement and entrainment are virtually identical to the ER. Please indicate whether (and if so, how) NRC Staff did its own independent assessment of the information that Dominion supplied in its ER.

Shoreline Habitat (Sec. 5.4.1.3)
Dominion's models predict that the flow from North Anna Dam will be reduced to 20 cfs for 11.8% of the time, compared to 5.3% of the time currently. The impact of increasing periods of extreme low-flow at 20 cfs—not only increased periods of flow at 40 cfs—from the dam on downstream habitat should be fully evaluated in the Final EIS.

Water Quality (Sec. 5.3.3)
A full analysis of the water quality impacts should be included in the Final EIS, including the list of effluents and discharge levels for Units 1 and 2 allowed under the current VPDES permit, as well as the list of expected effluents and discharge levels for Units 3 and 4.

Thermophilic micro-organisms (Sec. 5.8.1)
What is the basis for the conclusion that the increased water temperature in Lake Anna caused by the additional cooling structures required for new reactor units at the site would not be sufficient to "create an environment conducive to the optimal growth of

thermophilic organisms," which can cause primary amoebic encephalitis in humans (DEIS, Sec. 5.8.1)?

Impact on Lake Anna Recreation (Section 5.5.3.4)
This section fails to adequately consider the potential impacts on recreational use of Lake Anna from the operation of additional reactor units at the NAPS, which may significantly reduce the water levels in Lake Anna and, consequently, adversely affect river flow and aquatic life downstream. New reactor units may also have a negative impact on recreational fishing in North Anna through the effects of increased water temperature and impingement/entrainment, where fish and fish larvae are sucked into the water intake apparatus required to cool reactors at the NAPS.

According to the Virginia Department of Environmental Quality (VDEQ), regardless of a drought, the decreased water level necessary for additional units "would adversely affect lake access, and local economic conditions in the process."[5] One or two additional units on Lake Anna would reduce lake levels due to increased water withdrawals from the lake, especially in the summer and fall when demand for power and evaporation are higher. This was evidenced during the 2002 drought when the lake level dropped to a mere 245.1 feet above mean sea level, nearly requiring the NAPS to be shut down and preventing the use of most boat ramps (DEIS, page 5-44, lines 9-11).

Recreational fishing use on Lake Anna could also be damaged if the health of fish populations is diminished by the thermal impacts on the lake, as well as increased impingement and entrainment, from additional reactors at the site. These problems, combined with the adverse effects of a reduced river flow downstream from the plant caused by additional reactors, must receive a more thorough consideration in the NRC's final EIS on the North Anna ESP.

Fuel Cycle and Radioactive Waste

High Level Radioactive Waste
The Draft EIS fails to evaluate the environmental impacts and security threat of indefinitely storing the additional irradiated fuel that will be generated by the proposed reactors onsite. Another reactor or two at North Anna will each create annually between 100 and 150 metric tons additional irradiated fuel to the site. Despite the NRC's Waste Confidence Decision, the only site under consideration, Yucca Mountain in Nevada, is far from a done deal. Numerous scientific questions remain about whether the site can safely store waste. Moreover, the Department of Energy (DOE) has not yet submitted its license application to the NRC, although the statutory deadline was more than two years ago. DOE was supposed to begin accepting waste in 1998 and is highly unlikely to meet its revised goal of accepting waste by 2012.

Even if Yucca Mountain is opened, the site cannot hold the high-level radioactive waste that will be generated by existing reactors after 2010. Therefore, in addition to the waste

[5] Letter from Ellie Irons (Virginia Department of Environmental Quality) to Pamela F. Faggart (Dominion), February 10, 2004, page 11.

generated by existing reactors, waste created by new reactors at North Anna would also have to remain onsite for an indefinite period of time. The NRC recently approved an unprecedented 40-year license extension for Dominion to store high-level nuclear waste on site at its Surry nuclear plant near Williamsburg, VA, indicating that fuel can reasonably be expected to be stored at reactor sites for at least that long. The environmental impacts of indefinite storage must be thoroughly evaluated in the Final EIS.

Spent fuel reprocessing

The Draft EIS only considers the "no recycle" option for irradiated fuel management, which treats spent fuel as "waste to be stored at a Federal waste repository," and does not consider the "uranium only recycle" option, which involves the reprocessing of spent nuclear fuel (DEIS, page 6-3). Yet, the DOE has had significant setbacks in its attempt to attain a license for a federal repository for irradiated nuclear fuel at Yucca Mountain, Nevada (it has not yet submitted its application for the project), and the federal policy banning the reprocessing of spent nuclear fuel far from intractable. In fact, the DOE was granted more than $67 million in fiscal year (FY) 2005 for the "Advanced fuel cycle initiative," a research and development program intended to provide technology to "recover the energy content in spent nuclear fuel," and it has requested $70 million from Congress for FY 2006 for the same program.[6] This continued government interest in reprocessing, combined with the failure to establish a national repository for irradiated nuclear fuel, should compel the NRC to consider the impacts of spent fuel reprocessing in the Final EIS.

Depleted uranium

The draft EIS lacks a consideration of the environmental and public health impacts resulting from military applications of depleted uranium (DU), a byproduct of the enrichment process of the fuel cycle. Moreover, there is not a complete consideration of the impacts of managing this substance as a waste. There is no repository established for the permanent disposition of depleted uranium, but the impacts of such a hypothetical facility should be considered.

Uranium milling (Sec. 6.1.2.4)

The Draft EIS estimates that, for the reference reactor-year (a 1000-MW(e) LWR), 1.09 Million MT of raw ore would be required to produce 1200 MT of yellowcake for ultimate use as fuel after conversion, enrichment, and fabrication (DEIS, Sec. 6.1.2.5). Over time, as worldwide uranium ore supplies are depleted, requiring exploitation of less pure deposits of ore, would this ratio of ore to yellowcake increase? If so, would the environmental impacts of mining and milling become greater?

Transportation accidents (Sec. 6.2)

This section and the accompanying Appendix G of the Draft EIS do not give adequate weight and consideration to the possibility and consequences of severe accident scenarios

[6] U.S. Department of Energy, Office of Management, Budget and Evaluation/CFO, *Department of Energy FY 2006 Congressional Budget Request: Budget Highlights*, DOE/ME-0053 (Washington: DOE, Feb. 2005) 60-63.

resulting from the transportation of spent nuclear fuel. The possibility of extreme accidents, while slight, exists, as evidenced by recent incidents such as the Baltimore train tunnel fire of 2001 and the more recent accident in Graniteville, South Carolina in January, where a violent train crash and release of chlorine killed nine people, sent hundreds to the hospital, and required thousands to evacuate their homes.

Construction Impacts

Impact on Wetlands (Sec. 4.1.1)
Existing wetlands, streams, and woodlands on the North Anna site may be adversely affected by construction activities for the proposed Units 3 and 4 (DEIS, page 4-2, lines 20-23). Dominion's ER for the North Anna ESP observes, "Any work that has the potential to impact a wetland would be performed in accordance with the applicable regulatory requirements."(ER, Sec. 4.1.1.6.2) This is repeated almost word-for-word in the draft EIS at Section 4.1.1. The ER concludes, without supporting evidence, "Therefore, no construction-related impacts on water courses or wetlands would result" (ER, Part 3, Sec. 4.1.1.6.2). Does it necessarily follow that "applicable regulatory requirements" will preclude any negative impacts on wetlands? A more trenchant analysis of the question is deserved in the Final EIS, especially since Dominion provided no information on wetlands in its ER (DEIS, Sec. 4.3.1, line 9). Please explain the mitigation measures that will be employed to achieve this end.

Construction impacts on groundwater (Secs. 4.3.1 and 4.3.2)
The dewatering systems used during construction of the foundation of new reactors and associated buildings would "depress the water table in the vicinity and possibly change the direction of groundwater flow and the available capacity of local wells" (DEIS, Sec. 4.3.1, lines 20-22). What would be the approximate duration of this depression, and how many local groundwater users would be affected, including those users who might have their water diverted from the importation that may be required (DEIS, Sec. 4.3.2, line 35)?

Impact on aquatic ecosystems (Sec. 4.4.2)
According to the Draft EIS, the greatest construction impact on the aquatic environment of Lake Anna would come from the construction of the new cooling water intake structure and channel (DEIS, Sec. 4.4.2, lines 35-36), which would require activities such as dredging that could result in a loss of habitat (DEIS, page 4-12) as well as the possible resuspension of heavy metals left from mining activities. The mining runoff had previously contaminated Contrary Creek and parts of the North Anna River downstream such that virtually no aquatic life existed, and the contaminants may still remain in the region's sedimentation (DEIS, pages 4-12 and 4-13). The Draft EIS notes that any potential impacts from these activities "would be addressed through the Clean Water Act Section 404 permit and Section 401 verification process" (page 4-13, lines 22-24). Is this considered a mitigation measure?

Dredging and other construction allowed under an ESP may also resuspend PCBs, which are known contaminants in Lake Anna. A full analysis of PCBs in the sediments near the site and the impact of construction should be included in the Final EIS.

Water Supply (Sec. 4.5.3.6)
The Draft EIS acknowledges that even without the construction of new reactor units at North Anna, there may not be sufficient water and sewer infrastructure in the region to keep up with the expected growth. Further, a recent drought has exacerbated a shortage in the availability of water supplies in Louisa and Orange Counties, where there are no growth restrictions (DEIS, Sec. 4.5.3.6). Thus, the NRC staff has judged that the construction of new reactor units at the NAPS may have "moderate" impacts (page 4-31, line 34). Given this conclusion, the environmental impacts of extending services in Orange and Louisa Counties should be considered, as well as measures to mitigate those impacts.

Socio-economic Impacts of Construction

Development and population increase (Sec. 4.5.2)
Citing the comprehensive plan developed for Louisa County, the Draft EIS notes that "it is the goal of the Louisa County Board of Supervisors (LCBS) to preserve the rural character of Louisa County" (page 4-17, lines 14-16). But the construction of new reactor units at the North Anna site would require an additional workforce of up to 5,000 individuals (DEIS, Sec. 4.2.2), and the operation of such reactors would require a workforce of an additional 720 persons, which would increase the regional population by an estimated 2,900, assuming each worker represents a family of four (DEIS, Sec. 5.5.2). The Draft EIS states that the influx of construction workers would require the "conversion of some land in surrounding areas to housing developments (e.g., apartment buildings, single family condominiums and homes, manufactured home parks, and recreational vehicle parks) to accommodate construction workers and the addition of new retail developments" (page 4-2, lines 33-36). Even without the construction of the new reactor units, the population of Louisa County is expected to grow by 13 percent in the next five years and another 15 percent between 2010 and 2020 (DEIS, Sec. 4.5.1.3); moreover, the regional population is expected to grow by over 1 million by 2040. Is this degree of development consistent with the wishes and plans described in the LCBS to preserve the "rural character" of the region? Considering the desires of the LCBS, how does the NRC consider these impacts to be "small" (page 4-21, line 4)?

Housing (Section 4.5.3.5)
According to this section of the draft EIS, the construction workforce required to build new reactor units at the NAPS could reach 5,000, and there is a shortage of housing in Louisa and Orange Counties. Yet the building of new rental units to accommodate the influx of workers is not expected (though this seems to be contradicted by assertions to the contrary on page 4-2, lines 32-37), and, as a result, rents may increase and "some low-income populations could be priced out of their rental housing" (DEIS, page 4-30, lines 11-12). Nevertheless, the NRC staff opines that construction of new reactor units at the site will be "economically beneficial" for "disadvantaged population segments,"

concluding that impacts on housing will be "small" and mitigation measures are not warranted. Would it not be prudent to recommend the establishment of additional and/or affordable housing in the region in order to prevent a shortage?

Traffic impacts (Sec. 4.5.3.2)
Construction activities associated with adding additional reactor units to the NAPS site would require an additional workforce of 5,000 (DEIS, § 4.2.2, line 26), bringing the total peak workforce at the site to 7,000 during reactor outages, requiring roughly 3,900 transport vehicles (ER, Part 3, Sec. 4.4.2.2.1(d)) – representing a "major increase in traffic" in certain places (draft EIS, page 4-24, lines 4-5). Despite this dramatic increase in traffic to and from the site, the draft EIS describes the transportation impacts of the proposed action to be "small" and proposes no additional mitigation measures beyond Dominion's traffic management plan (draft EIS, § 4.2.2, lines 5-8), which may not fully alleviate traffic congestion (page 4-23, line 35). There are no plans to build new roads or alter current roads, despite existing congestion on roads around Lake Anna (draft EIS, page 4-19, line 17). Would not this dramatic increase in traffic alter the "rural character" of Louisa County that the Louisa County Board of Supervisors wants to preserve (draft EIS, page 4-17, lines 14-16)? Furthermore, how can the NRC claim to predict the sufficiency of existing regional roads to support construction activities, considering that the potential for a dramatic increase in population over the next 20 years (*see* draft EIS, Table 2-5), the duration of the ESP?

Furthermore, how can the NRC claim to predict the sufficiency of existing regional roads to support construction activities, considering the potential for a dramatic increase in population over the next 20 years (DEIS, Table 2-5), the duration of the ESP?

A measure propounded in the Draft EIS to mitigate traffic impacts from the construction of new reactors at the North Anna site is the widening of a country road, SR 700 (page 4-24, lines 30-32). For what section and length of roadway would this be required, and what environmental impacts would be expected? What would be the impact on property owners along the route?

What potential effects could the institution of electric utility deregulation in Virginia have on the taxation of Dominion and the NAPS? It is suggested on page 5-42 of the draft EIS that deregulation may affect the amount of property taxes paid by Dominion.

Historic and Cultural Resources

Historic and cultural resources (Sec. 4.6)
Parts of the North Anna site that would be used for new reactors and related facilities have been identified as having a "Moderate-to-High" potential for containing historic or cultural resources (DEIS, page 4-35, lines 33-39). What is the basis for this assessment, and what sort of mitigation measures would be employed should such resources be discovered? Further, what is the nature of the communications with Native American tribes that have concluded the probable absence of any significant traditional properties or cultural resources?

Worker Safety

Radiation exposure (Section 4.9.1)
The DEIS wholly incorporates the calculations and analyses of Dominion regarding the expected routine level of radiation exposure to construction workers building new reactor units and their appurtenant facilities at the NAPS. Has the NRC staff conducted independent reviews to verify the accuracy of Dominion's calculations? Further, has Dominion or the NRC contemplated accident scenarios and their potential affect on a construction workforce that could be as large as 5,000 people?

Air

Air Quality (Sec. 2.3.2)
Please list the non-radiological emissions and amounts that are permitted to be released from the existing plants under the Exclusionary General Permit, as well as the 2000 emission statement. What are the expected emissions with two additional reactors at the site? The DEIS (page 2-17, lines 1-4) states that "additional records to be submitted along with a certification for all emission sources" and that "the additional emissions are expected to be limited to a short test period." Please clarify the phrase "short test period."

Meteorological and Air Quality Impacts (Sec. 5.2)
Please list the "bounding values" of the non-radiological pollutants that would be permitted to be released during auxiliary boilers and generators from the proposed new reactors.

Terrestrial Resources

Transmission Line Rights-of-Way (Secs. 5.1.2 and 5.4.1.4)
The NRC staff is assuming that "the existing transmission lines are adequate and new transmission lines will not be needed" (page 5-2, line 1-11). This is yet another example in the Draft EIS of putting off important analyses, in this case a load flow study, until the COL stage. Determining whether there is sufficient capacity on the existing transmission lines is crucial for analyzing whether the land-use impacts to offsite areas will be significant – obviously an important siting issue. Therefore, this analysis should be done for the Final EIS, and the impacts on terrestrial resources (Sec. 5.4.1.4) and threatened species (Sec. 5.4.3) of building one or more additional transmission lines should be fully considered.

Plant Parameter Envelope

Dominion is not required to choose a specific reactor design in its ESP application, and instead, has selected a range of designs to set a "plant parameter envelope" (DEIS, Sec. 3.2, page 3-3). The fact that none of the reactors that Dominion is using to set its design parameters have ever been built in the U.S. should be explicitly stated in the Final EIS.

Taxes (Sec. 4.5.3.3)
According the Draft EIS, no quantitative assessment of the impact on regional tax revenue can be provided at this time because Dominion has not yet selected the type of reactor it would build at the North Anna site. This is yet another example of the arbitrariness of the licensing division between ESPs and COLs, a separation that precludes a complete analysis of the environmental impacts that would be produced from the construction and operation of new reactors at the North Anna site (or any reactor site, for that matter).

Issues Missing from the Draft EIS

Vulnerability to terrorism
Nuclear power plants have known vulnerabilities to terrorist attack and sabotage. According to the 9/11 Commission Report, al Qaeda specifically discussed targeting U.S. nuclear plants. Fuel storage pools, dry storage facilities, and reactor control rooms are not designed to withstand the type attack that occurred on September 11, 2001. The Government Accountability Office (GAO) concluded in recent testimony before the U.S. Senate that cargo and general aviation airfields, three of which are located very close to the North Anna Site (DEIS, page 2-10), are more vulnerable to security breaches than commercial airports.[7] Ignoring the threat because it is "highly speculative"[8] does not make the threat go away, and indicates one shortfall of using an exclusively risk-based approach.

One possible security measure to protect the reactor from assault by aircraft is to place a reactor below ground level. Therefore, an analysis in the Draft EIS of the suitability of the site to place the reactor containment below-grade level should be done, which would require an in-depth analysis of geological and hydrological conditions at the site.

Does the range of severe accidents that could occur at the North Anna site with the addition of reactor Units 3 and 4 (DEIS, Section 5.10.2) include an external attack on the scale of the one that occurred on September 11, 2001 at the World Trade Center in New York City, where hijacked aircraft were employed to destroy two very large office towers? If not, would such an attack be bound by the accidents considered in the Draft EIS, or would such an event require a unique analysis?

Need for Power and Who Benefits
According to NRC regulations [10 CFR 52.17(a)(2)], the need for power does not have to be addressed in the ESP process. But an evaluation of the need for power and who benefits is crucial to determining whether the ESP application should be considered at all. In fact, the first question that should be asked is whether residents of Virginia will receive

[7] *Aviation Security: Improvement Still Needed in Federal Aviation Security Efforts*, Testimony of Norman J. Rabkin Before the Subcommittee on Aviation, Committee on Commerce, Science and Transportation, U.S. Senate, Government Accountability Office, GAO-04-592T, March 30, 2004.
[8] Nuclear Regulatory Commission, *In the Matter of Private Fuel Storage L.L.C.*, Docket No. 72-22-ISFSI, (CLI-02-25), page 13, December 18, 2002.

any of the benefit of new reactors. Pending approval of the North Carolina Utilities Commission, Dominion will join the PJM interconnection. PJM is the largest regional transmission organization (RTO) in the U.S., and currently coordinates the movement of electricity in all or parts of Delaware, Illinois, Indiana, Kentucky, Maryland, Michigan, New Jersey, Ohio, Pennsylvania, Tennessee, Virginia, West Virginia and the District of Columbia. The Final EIS should include an analysis of what the PJM will mean for Virginia ratepayers, including the fact that Dominion is likely to export the electricity generated by the new reactors at North Anna to other states such as New Jersey where electricity prices are twice as high as Virginia and revenues will be greater.

Other Issues

"Best Management Practices"
Please define the term "best management practices," which occurs throughout the draft EIS.

Electromagnetic fields and electric transmission line capacity
Since it is possible to make a reasonable estimate of the electric generation output from additional reactors at the North Anna site, why is Dominion allowed to wait until the COL licensing stage to determine whether transmission lines from the site meet the requirements of the National Electric Safety Code (NESC) regarding electrostatic effects from operation (DEIS, Sec. 5.8.4)? The maximum steady-state current allowed by the NESC is 5 mA root mean square (rms), and the current from Units 1 and 2 was found to range as high as 4.95 mA (§ 5.8.4, line 26), so is it reasonable to assume that increased capacity from two new units at the site would exceed NESC standards for electrostatic fields? If so, why is this issue not being addressed at this stage in the licensing process?

Further, the National Institute of Environmental Health Sciences (NIEHS) has determined that electromagnetic fields may pose a leukemia hazard in human populations (draft EIS, page 5-55, lines 1-3). Would a stronger electromagnetic field produced by increased voltage capacity on the transmission lines from the NAPS amplify this hazard?

12/10/04

RDB received 3/8/05

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February 25, 2005

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Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration, Mailstop T-6D59
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: North Anna ESP Permit and DEIS

Thank you for the opportunity to review and comment on the DEIS.

In preparing these comments, I have tried to follow the section numbers in the DEIS but since many items come up in several parts of the document, the comments should be considered to apply to all such occurrences. Furthermore, I apologize if comments may be referenced in the wrong section (for example, comments on impacts are given with cites to sections on the existing environment).

In general, the North Anna document does not conform to the standards for a NEPA-compliant DEIS.

1. I could not find in the DEIS a definitive statement of the proposed project's net electrical output. How can one assess the cost/benefits without this core data?

2. I could not find in the DEIS a mention of whether the proposed project would be a regulated rate-based plant or a merchant plant. How can a Dominion customer assess the cost/benefits without this core data?

3. The Executive Summary page xxi line 38 states that the ESP application (and thus by extension an EIS on an ESP) must address "site safety, environmental impacts, and emergency planning". Complete information on all three of these points is lacking in the EIS.

4. Abstract page iii line 10 et. seq. states "that the proposed action does not include any decision or approval to construct or operate one or more units". This is misleading since a lot of construction is permitted by the ESP. To the layman it seems that all but the nuclear reactor itself could be permitted by the ESP.

5. Page 1-1 states that the safety characteristics and emergency planning are to be analyzed separately from the EIS process. NEPA clearly states that an EIS is required for "any major federal action significantly affecting the quality of the human environment". Since safety and emergency planning are elements of the human environment, a NEPA EIS should address these points directly. The EIS is intended to be a primary source of impact information (both

SISP Review Complete

E-RIDS = ADM-03
Add. = J. Cushing (JXC9)
A. Wilkinson (AKW1)

Template = ADM-013

positive and negative). Besides the legal shortcomings of the current approach, how can the public and local governments be well-informed about the project if the basic data, analysis, and conclusions are spread across a variety of proceedings? This unfairly disenfranchises stakeholders.

6. Page 1-3 states that the ER does not need to include discussion of energy alternatives. A NEPA-compliant EIS, on the other hand, does need to.

7. Page 1-3 states that the EIS does not include an assessment of the benefits of the proposed action. It is thus not a NEPA-compliant EIS.

8. Page 1-5 line 28 mentions the North Anna Dam. Shouldn't an analysis be done and included herein on the safety and environmental impacts if the Dam is breached?

9. Page 1-2 line 41 mentions the thermal capacity of the plant but not the electrical (useful) capacity. This major omission does not allow the reader to determine the efficiency of the power plant.

10. Page 1-6 line 3 states that the proposed fourth plant would use dry coolers. Is there an operating nuclear plant in the U. S. that has demonstrated this technology is appropriate and safe for such a large thermal load? If not the technology risks should be assessed and discussed herein.

11. Page 2-1 line 24 mentions that I95 passes within 16 miles of the site. Later sections do not adequately detail the impact on I95 during upset conditions at the plant or upset conditions on the road. The DEIS fails to demonstrate that a plant upset would not adversely impact I95 or US1 which is THE major north-south corridor in the Mid-Atlantic region.

12. Page 2-1 talks about a 50-mile radius but in other parts of the document different radii are used (see for example Figures 2-3, Table 2-1). A consistent area or areas should be used throughout the document. For example, a 15 mile radius might be the HIGH area of impact, a 50 mile radius (which would include Richmond) might be MEDIUM areas of impact, and an 80 mile radius (which would include DC) might be a LOW area of impact. For each parameter addressed in the DEIS the impacts in each area of impact should be defined. Impacts on DC must be addressed.

13. Page 2-5 line 1 states that the Lake Anna Special Plan is "final". Please verify this statement. Furthermore, it would be useful to state whether the Plan addresses nuclear expansion in the region and/or nuclear evacuation plans. There may be a disconnect between local planning and the proposed project.

14. Along the lines of comment 12 above, Page 2-5 line 10 defined "the region" as within a 50 mile radius but provides no basis for why that area was

selected. In this comment I also noted that DC is generally considered part of the region.

15. Page 2-5 line 30 rightfully states that "the land adjacent to Lake Anna is becoming increasingly residential as the area is developed". No new transportation routes (roads or railroad lines) or new industrial activities are currently planned in the vicinity..." The combination of increased population without increased transportation for emergency egress/ingress could be a recipe for disaster even without the proposed nuclear expansion. This DEIS statement itself is enough basis to reject the later conclusion that impacts on transportation and the human environment are small.

16. Page 2-7 line 26 lists a variety of local planning documents. What do these plans say about nuclear material transport, nuclear material storage, power generation facilities, nuclear waste storage, and nuclear waste transport through the jurisdictions? Simply listing the local planning documents does not define the current planning environment against which the proposed action is to be judged as an overlay. As stated in comment 13, there are disconnects between local planning and the proposed project.

17. What is the current status of Dominion's VDEQ certification as discussed on Page 2-8, line 16?

18. Page 2-9 line 1, Sections 3.3, 4.1.2, 5.1.2, 5.8.4, etc. discuss transmission access, a critical component of determining site suitability. The document asserts that no transmission expansion would be required at any time any place within the region within twenty years after receipt of the ESP and that the entire electrical output of two new nuclear generators can be transmitted.

    I have three problems with the approach: (A) The conclusion is suspect – rules of thumb (no details where given on the line configurations) indicate that the three lines would have a combined capacity of about 1,750 MW so the lines would be above capacity with the four nuclear units. (B) The methodology is flawed – the EIS says that the line capacity is available and that the load flow study (to verify the assertion) would be done later!! That is not a scientific approach suitable for a DEIS. If the load flow study is done later (or conditions on the line change) and it is determined that additional lines are required, the DEIS conclusions about the site would be voided. (C) The "bubble concept" requires that any new transmission lines be analyzed in the DEIS.

    If Dominion stands by its assertion that no new transmission is required, Dominion could stipulate that as a condition of the ESP. Otherwise, a detailed transmission assessment and a study of the related impacts must be done now and incorporated into the DEIS. This should include a 20-year load flow forecast.

19. Page 2-9 line 15 discusses "the region" and it fails to mention that Fredericksburg is within the radius drawn. Was Fredericksburg considered in other parts of the analysis?

20. Table 2-1 shows the Land Use in four nearby counties. On this and other measures, the DEIS review of the Existing Environment should include a forecast of the conditions over the twenty year life (since the timing for the action is uncertain) of the EPS as the baseline. Given the rapid population growth in the area, the 2002 data cited is already obsolete and huge changes are already forecast for the region even without considering the proposed project. Spotsylvania, for example, is one of the fastest growing areas of the State. If the DEIS showed current conditions and forecasts for say 5, 10, 20 year intervals as the baseline, the impacts of the project could be put into better perspective.

21. Table 2-1 shows data for four counties. As mentioned in our comment #12, this is inconsistent with discussion of a "region" of study.

22. Page 2-11 mentions that the summers are hot and humid. What is the suitability of dry coolers (for the proposed Unit 4) to this climate? This could be problematic given the statement on Page 2-13, line 15 that relative humidity is not measured at the site.

23. Page 2-12 line 4 confirms that the prevailing winds are from the south-southwest. This is just one reason that impacts on Fredericksburg and the DC metropolitan area should be assessed.

24. Page 2-13 line 15 states that relative humidity is not measured at the site. Regional warming of the Lake contributes to microclimates, increased humidity, and intermittent ground fog. This parameter should be measured.

25. Page 2-13 line 27 indicates that heavy fog is an issue at the site. The increased warm water from the proposed project would contribute to increased heavy fog during some cooler days. The impacts to traffic from this occurrence should be addressed in the DEIS.

26. Page 2-13 line 31 discusses that severe weather may occur in the area. These weather events can contribute to power outages and disruption of road access. Increased generation of power from a few large power plants in one location does nothing to improve regional system transmission stability whereas de-centralized generation would offer that benefit.

27. Page 2-14 line and other parts of the report use inconsistent meteorological reporting periods and thus an inconsistent data set.

28. Page 2-14 line 14 reports on storms during the period from January 1950 through July 31, 2003. This is an arbitrary time period which does not include Hurricane Isabel, for example.

29. Page 2-25 line 25 states that good data is available from 1/1/96 to 12/31/01 yet line 32 states that only a portion of this interval was used for the DEIS analysis data. Why? Furthermore, the use of a three year data set is arbitrarily low.

30. Page 2-15 line 36 states "The NRC staff expects that the current monitoring system would remain operational". The applicant should be required to stipulate to this and add additional monitoring (for example, relative humidity) as may be required.

31. The small data set cited in 29 is especially problematic given that it is used for the radioactive dispersion assessments (Page 2-16, line 5).

32. Although there is assessment of design-basis accidents and routine releases, no assessment of worst case releases is included. This data would be important for the public and local governments and should be included.

33. Page 2-18 line 18 states that this DEIS tiers off the preoperational environmental radiation monitoring program. Since the two units have been operational for some time, the baseline should be re-established via a new study.

34. Page 2-18 line 33 states that the NRC concluded that radiation doses were small. Since a DEIS is intended to be a public document, data of this type should be summarized and included in the DEIS along with the staff conclusions derived there from.

35. Page 2-20 line 9 states that units 1 & 2 have "likely" added to evapotranspiration. Since a DEIS is intended to be a public document, data of this type should be summarized and included in the DEIS along with the staff conclusions derived therefrom. If actual data is not available then the formulae or methodology for prediction should be included.

36. Page 2-21 line 31 is very troubling. It states that "it is not possible to create a reliable water budget for Lake Anna". How then, can any of the impact forecasts be reliable?

37. Page 2-21 line 40 discusses that limited data is available. Why have no dye experiments been done and the information used? Since hydrology is a key *site characteristic* and not an operating parameter, deferring velocity flow measurements to the CP/COL stage is not good science or proper EIS procedure.

38. Page 2-22 line 30 mentions other surface water users. Have these entities been directly consulted?

39. Page 2-22 line 41 states that there is "limited projected development in the three upstream counties" which includes Spotsylvania. This statement, and therefore any conclusions drawn from it, is false. The February 23, 2005 Free Lance Star reported that Spotsylvania is one of the 20 fastest growing counties in the United States!

40. What would be the impacts to the project and the Lake Anna area if the Virginia State Water Control Board designates it as a surface water management area (Page 2-23 line 25)?

41. Page 2-24 line 33 states that the proposed unit 4 is "expected" to use dry cooling towers. Since this is the basis for the entire DEIS, Dominion should be required to stipulate to this approach.

42. Page 2-24 line 38 states that "there are no site-specific data available for the chemistry of the groundwater underlying the ESP site." Why not? Shouldn't groundwater monitoring wells, water sampling, and chemical analyses be part of the ongoing monitoring of a nuclear power project that stores radioactive waste? Shouldn't baseline monitoring be required now as part of the impact evaluation of the proposed units 3 and 4? This data is clearly on point in evaluating a site as opposed to evaluating its operations (CP/COL).

43. Page 2-25 line 15 states that "many of the same monitoring activities would be continued". The applicant should stipulate now that monitoring activities will be continued and expanded. Preferably, monitoring activities should be detailed as one of the mitigation measures in a DEIS.

44. Page 2-25 line 35 again states that "many of the same monitoring activities would be continued". The applicant should stipulate now that monitoring activities will be continued and expanded. Preferably, monitoring activities should be detailed as one of the mitigation measures in a DEIS.

45. Page 2-27 line 29 discusses wetlands associated with streams and one within the ESP site. What wetland preservation efforts will be done?

46. Page 2-29 lists some of the birds in the areas. Dry coolers may emit high-pitched sounds. What are the impacts on avian and terrestrial species?

47. Page 2-31 line 30 mentions that Dominion has cooperated with Ducks Unlimited and the Audubon Society to allow informal monitoring. Has the NRC consulted directly with these groups?

48. Page 2-31 line 31 states that the "NRC expects Dominion to work with the State on development and implementation of any required monitoring programs". The applicant should stipulate now which monitoring activities will be implemented. Preferably, monitoring activities should be detailed as one of the mitigation measures in a DEIS.

49. Page 2-34 line 6 discusses clams in Lake Anna. What chemical and mechanical control measures against clams and other aquatic organisms are used by Dominion to protect the cooling water intakes and outflows? What assurances are there that these organisms will not interrupt the flow of necessary cooling waters? The discussion on page 2-39 line 28 is too cursory to be evaluated.

50. Page 2-34 line 6 discusses clams in Lake Anna. How will the increased lake temperature from the proposed units effect the clam populations?

51. Page 2-34 discusses fish populations. What percentage of fish catches and deaths show abnormal anatomy? How does this percentage compare to inland waters around other nuclear plants? How does this percentage compare to inland waters not near nuclear plants?

52. Page 2-36 line 42 states that striped bass are already subject to environmental stress from the existing two units but the later discussion about the impacts of increased thermal loading from additional nuclear units is cursory.

53. Page 2-37 line 15 talks about "professional fishing guides" and line 25 states that the Lake "is heavily fished". What compensation will there be to these business if the impacts of increased thermal loading from additional nuclear units affects their business?

54. Page 2-37 line 24 acknowledges the project proximity to Washington, D.C. yet the document is largely void of discussion of impacts on the D. C. area.

55. Page 2-40 line 11 states that the WHTF "is physically separated from the rest of Lake Anna by a series of dykes". What is the susceptibility of the WHTF to earthquakes, hurricanes, and other natural or terrorist disasters?

56. The socioeconomic sections of the DEIS are unfortunately weak. The DEIS thus cannot be used as an effective decision-making tool.

57. The lack of analysis and discussion of security against terrorist threats is a major omission. This subject is clearly part of today's "human environment". It is ironic that on the morning of the Louisa public hearing that the federal government announced that the U. S. is still the target for such acts yet the ESP process seems to ignore any analysis and disclosure on this subject.

58. The lack of detailed safety discussions in the socioeconomic sections is a major flaw in the ESP process. Thus the DEIS cannot be effectively used as a decision-making tool.

59. Page 2-45 line 16 states that the "impact area for the analysis" includes only the counties of Henrico, Louisa, Orange, and Spotsylvania and the City of Richmond. This area is too small because likely and potential impacts exceed as far out as 80 miles from the site. This area is arbitrary and inconsistent with other study areas used in the DEIS (see comment #12).

60. The demographic data used in section 2.81 on Page 2-45 is outdated and inaccurate. Spotsylvania County, for example, has grown 24% in the last five years!

61. As stated in comment #20, a population forecast through 2026 should form the baseline of the existing environment. The project could then be overlayed on this forecast to assess impacts at different time intervals.

62. The use of population radii in Section 2.81 is good. However inconsistent radii are used throughout the section so comparisons (for example of stable and transient populations) are difficult.

63. Page 2-48 mentions Paramount's Kings Dominion. Have they been directly consulted about the likely impacts of the proposed project on their facility and its use?

64. Page 2-48 states that Kings Dominion usage rates "could" slow in the future. They easily "could" increase or remain stable, depending on the regional economy, the success of the Kings Dominion's marketing efforts, and any impact that the proposed project would have on the region.

65. Page 2-54 line 41 cites a 2002 study that Capital One is one of the largest private employers in the area. How have well-publicized job cuts there since 2002 changed this rating?

66. I appreciate the section on Environmental Justice in plant siting. How does the conclusion reached therein mesh with the statement on page 2-55 line 29 that Louisa County (where the project would be sited) has the second highest poverty rate and second lowest median income?

67. Page 2-55 states that NAPS has been economically beneficial to Louisa County but does not cite any data to quantify this impact.

68. Page 2-55 states that Louisa County would like to lessen its dependence on NAPS through diversification of the local economy. The proposed project

would be counter to this local goal. What mitigation measures is the applicant proposing to foster the County's diversification goals?

69. What mitigation measures is the applicant proposing to provide direct economic benefit from the proposed project to those neighboring counties that do not receive tax revenues?

70. Page 2-57 line 9 states that "there are no growth restrictions in Spotsylvania County". Please define this phrase. The County has zoning and other restrictions.

71. Page 2-57 line 32 mentions that there are 32 counties within a 50 mile radius of the project. It is not clear whether this 50 mile radius is the subject area for this part of the analysis. As stated in comment #12, consistent subject areas should be used.

72. Page 2-57 line 34 acknowledges that there are only two major freeways in the area. The impact on these thoroughfares and their feeder roads during an evacuation is not really addressed in Sections 4-7.

73. Along the lines of the prior comment, Sections 4-7 does not address the impacts to the commuter roads listed on page 2-58 line 6.

74. Page 2-58 line 13 acknowledges that the Thornburg area is getting congested. This is a major route to/from Lake Anna and there currently are no funds dedicated to the needed improvements.

75. The traffic discussion on pages 2-59 and 4-25 regarding Spotsylvania roads is hard to understand and I am familiar with the local road network and plans. Presently, Courthouse Road is 208, not the Spotsylvania Parkway. The Spotsylvania Parkway is significantly north of route 606.

76. Section 2.8.2.5 on Housing and the related parts of Sections 4-7 do not assess the impacts of the proposed project on housing values in the Lake Anna area.

77. The assumption on page 2-62 line 36 that temporary housing for refueling workers is as dispersed as for permanent employees is unsubstantiated. Furthermore, if four units are operational, the potential for overlap of refueling outages increases and thus the possibility that significantly more than 700 temporary workers would be required at one time.

78. The "Police, Fire, and Medical Facilities" section on page 2-68 is substantially flawed. It states that there are TWO hospitals in Spotsylvania when there are NONE.

79. The lack of full-time hospitals and fire/rescue facilities in the immediate Lake Anna area creates a high potential for serious impacts from an accident at the project.

80. Page 2-72 line 26 mentions that some undisturbed areas have some potential for cultural resources. I was unable to find in the DEIS a statement that these areas would be examined and cleared prior to any site work occurring there.

81. The proxy plant approach that is used to define the Plant Parameters in Section 3 and elsewhere is hard to follow. Min, average, and max values for each key parameter should be clearly identified.

82. What is the rationale for not using the same plant values in the DEIS and the safety review (Page 3-3 line 18)? It seems like bad science.

83. What is the rationale for not using the PPE in the transportation analysis (Page 3-4 line 37)? Mixing methodologies weakens the conclusions that can be drawn.

84. Where data is referenced from another document like in Page 3-5 line 31, a summary should be included in the DEIS.

85. It would be helpful to provide comparisons for Plant Parameters to the existing two units.

86. What is the capital and operating cost associated with the dry coolers (Page 3-7 line 22)?

87. Page 3-7 line 27 refers to the "PPE concept" to define the boundaries of liquid radioactive effluents and system performance but no summary of the data is included.

88. The conclusion of Section 4.1.1 is that the Construction phase would only have "SMALL" impacts (defined on page xxii as "not detectable or so minor that they will neither destabilize nor noticeably alter any attribute..."). This is obviously false for a project with a capital cost of greater than $500 million and with about 5,000 construction jobs in a largely rural region.

89. Page 4-4 line 9 states "potential" mitigation measures. The DEIS should specify the actual mitigation measures to be used which should be stipulated by the applicant.

90. Section 4.2.2 states that Construction impact on transportation is SMALL. The text ("2800 vehicle trips per day", roadways would experience congestion, "five existing roads are expected to he impacted") does not support this conclusion and seems to indicate a LARGE local impact.

91. Section 4.2.2 does not include detailed background transportation counts or LOS projections which are typically used to assess transportation impacts. The suggested methodology is to do a 20-year traffic forecast as the baseline and then overlay the 2800 vtpd at several instances to assess the impact.

92. Since Section 4.3.1 line 9 states that "Dominion did not provide information on wetlands in its ER" how can the DEIS conclude that the impacts of hydrological alterations would be SMALL? The text discusses numerous possible impacts.

93. Section 4.3.1 line 9 states that "Dominion did not provide information on wetlands in its ER". That does not relieve the NRC as lead agency from its responsibility to collect, analyze, and report information on wetlands in the DEIS. This information must be included since Page 2-27 line 29 mentions that there are wetlands in the vicinity.

94. Page 4-8 line 15 discusses possible third-party permit conditions that "may" restrict the timing of certain construction activities. What if these permits are not imposed by the other agency? The applicant should stipulate here the mitigation measures to be applied.

95. How will the increased temperature of the lake contribute to mosquito populations, particularly those that are West Nile disease carriers?

96. Section 4.5.1.1 fails to account for the fact that the construction and new plant operation will provide increased access to the site which could increase the potential for accidents and terrorism.

97. Page 4-17 line 11 discusses a ten mile radius from the site without providing a rationale for why this radius was selected. As suggested in comment 12, I believe that rationales should be provided and several radii should be used for all parameters studies.

98. The conclusion of SMALL impact for Section 4.5.1.3 is not supported by the text or the actual situation in the region. There is little to no funding for road expansions. The VTRANS 2025 report shows that gridlock is *expected* on major roads and at major interchanges.

99. In Section 4.5.1.3 local officials are cited as being of the belief that road alterations need to be evaluated "prior to construction". This does not mean that this issue should be deferred to the CP/COL stage – local access and the impacts on transportation are clearly site related issues and should be thoroughly evaluated at this time.

100. Section 4.5.2 ignores the strain that a new populace would place on the limited health care resources in the region. This is a major socioeconomic factor and should be thoroughly analyzed.

101. Section 4.5.3.1 should include typical salary information for the jobs to be created.

102. Page 4-22 line 17 seems to indicate that the NRC consulted primarily with Dominion in assessing whether there is a sufficient labor force. Independent analysis should be done especially since the residential and commercial construction markets have taken off since the December 2003 survey.

103. The conclusion of SMALL impact for Section 4.5.3.2 is not supported by the text or the actual situation in the region.. There is little to no funding for road expansions.

104. Page 4-24 line 9 states that mitigation measures would be required. These measures should be detailed now and included in the DEIS.

105. The Spotsylvania road improvements on page 4-25 line 7 are not fully funded and thus may not occur or may be delayed.

106. There is no planned Spotsylvania Turnpike exit from I-95 (Page 4-25 line 36).

107. Page 4-25 line 39 acknowledges that the I-95/606 interchange is congested at "LOS D or worse". Line 13 acknowledges that SR208 from Blockhouse Road to Lake Anna (about 12.5 miles) is a minor two-lane road. Increased construction usage will have major impacts on these roads. If an evacuation is required during the construction interval when additional personnel are on site, the impact would be staggering.

108. Section 4.5.3.3 is almost useless without including indicative numbers for the capital and operating costs and the likely tax contributions that would result.

109. Section 4.5.3.3 should consider the potential for loss of property tax revenue from the residential sector in the area if the proposed project results in a devaluation of real property.

110. The conclusion of SMALL impact for Section 4.5.3.5 is not supported by the text or the actual situation in the region.

111. What is the estimated number of new residences that would be required in Spotsylvania to serve the construction (and later operating) personnel? If

these persons have school age children, this would add to the growing education demands.

112. Why not stipulate the need for cultural resource assessments now (Page 4-35 line 37)?

113. The mitigation measures mentioned on page 4-37 line 35 should be stipulated to by the applicant. "Developing a plan" at a later stage as mentioned in Section 4.10 is not adequate.

114. Why isn't the independent spent fuel storage facility underground (Page 4-40 line 10)? This would help protect it for air attacks.

115. The dose assessment on Page 4-40 line 28 ignores potential overtime hours.

116. Why were samples taken to the west when the prevailing winds are to the northeast (Page 4-41 line 30)?

117. Section 4.9.4 gives a mean forecast. What about potential upset conditions? Shouldn't a worst case analysis be included for low-probability events?

118. The measures outlined in section 4.10 are a good start but additional detail is required now to understand the likely site impacts.

119. Page 4-44 line 32 change the word "may" to "would".

120. Page 4-46 line 1 states that Dominion would post a $10 million guarantee. Given the recent risks in the utility industry, Dominion should be required to post a Letter of Credit from a bank rated A or better in the event that its own credit rating drops below investment grade.

121. The NRC and applicant should stipulate that there will be no extension of the 20 year ESP window under any circumstances. Otherwise, statements like those on Page 4-47 line 2 are worthless and the DEIS analysis becomes even more detached from actual conditions.

122. Page 5-1 line 13 states that the operating period for the proposed project would be 40 years. Is the applicant prepared to stipulate that? If not, would another EIS be required for an extension of the COL?

123. Page 5-1 line 40 states that "any growth would be managed" because the counties have land-use plans. Just because the counties have plans, doesn't mean that growth is managed. Furthermore, at least for several of the adjacent counties, the plans do not specifically contemplate the proposed action.

124. Page 5-2 line 35 mentions that air quality impacts of "routine" releases would be limited. The document does not include a good analysis of the "non-routine" releases. It would be helpful to understand the potential magnitude of these releases even if they have a low probability of occurrence.

125. Section 5.3 does not fully address downstream impacts of the proposed project.

126. Page 5-4 line 20 references a water budget model yet on page 2-21, the document states that a reliable water budget model does not exist.

127. Page 5-4 line 21 seems to infer that during normal years the water level in the Lake would be acceptable. What about during drought years?

128. Page 5-4 line 25 refers to the drought as a "climatic anomaly" -- droughts are normal occurrences over time.

129. Page 5-5 line 15 discusses a methodology that was used to estimate evaporation rates. Was the higher Lake temperature to be expected from the proposed Unit 3 included in this analysis?

130. Page 5-5 discusses a very weak methodology for assessing water impacts. Line 16 acknowledges that the method has the potential for significant error. Given the importance of the Lake to the region, a more rigorous analytical method should be used similar to that used for FERC hydro applications for inflows.

131. What was the length of the dataset from which the data was extracted for the analysis on Page 5-5 line 33?

132. Were the Section 5.3 methodologies that were developed back-tested against actual water levels? What was the level of significance of the match between the forecasts and actual levels?

133. Page 5-6 line 22 is missing data in the parenthesis "9.7 BTU/hr" is not correct).

134. The PPE methodology discussed on page 5-6 line 39 is too simplistic. Since both ambient and water temperatures are hotter during the summer, a seasonal analysis should be done. This would also permit better analysis of the temperature impacts on aquatic species since their activities can be seasonal (Section 5.4.2.7 states that cool months would have SMALL impacts on striped bass).

135. The impact analysis deferral on page 5-7 line 11 is objectionable.

136. The data presented does not support a SMALL impact rating on page 5-7 line 19. The very fact that Unit 4 would be designed to use air coolers indicates that the water impacts are much larger.

137. Why wasn't actual site meteorological data considered for the analysis mentioned on page 5-8 line 22?

138. What duration of meteorological data was used for the analysis mentioned on page 5-8 line 22?

139. Page 5-8 line 41 states that the Lake level is being managed to maintain a stable level of 76.2 meters yet the modeling results on Page 5-9 predict a lower level for all four scenarios mentioned.

140. Page 5-9 line 10 references a water budget model yet on page 2-21, the document states that a reliable water budget model does not exist.

141. Given a MODERATE impact rating on Page 5-10 line 10, how can the statement that no mitigation is warranted be correct? The proposed facility, if permitted, should be required to have design and operational mitigation to minimize the water impacts. These mitigation measures should be spelled out in the DEIS.

142. Dry coolers may emit high-pitched sounds which could affect certain wildlife. The frequency characteristics of the noise should be assessed in addition to the sound pressure levels in Section 5.4.4.

143. What is the basis for the statement on Page 5-11 line 32 that collisions would be rare.

144. How can a 20% change (52% from 44%) in the low flow conditions not have noticeable downstream impacts?

145. Delete the phrase "if additional power from Units 3 and 4 is transmitted through this system" from the end of Section 5.4.1.4.

146. How can a 300% increase in the number of fish impinged (422,000 per year from 182,000) be considered a SMALL impact in Section 5.4.2.2?

147. Although Section 5.4.2.3 concludes that entrainment impacts would be SMALL, the *cumulative* effects of impingement, entrainment, radiation, and other aquatic hazards should be assessed and described (Section 5.4.2.7).

148. The assumption in 5.5.1.3 that "any needed upgrades in the road system would have been made" is flawed. This assumption leads to the DEIS

conclusion that road impacts are SMALL. Funds for transportation in Virginia are seriously constrained. The analysis should be re-done without this assumption.

149. Ground fog is a serious problem along Route 208 in the vicinity of the Lake at times (Page 5-37). This problem will be worse if the Lake waters are heated up.

150. What microclimatic temperature increases and secondary impacts could result from the dry cooler operations (Page 5-38 line 3)?

151. Change the word "could" to "would" on Page 5-18 line 18.

152. Change the word "could" to "would" on Page 5-41 line 18.

153. Sections 5.5.3.1 and 5.5.3.2 do not consider evacuation impacts.

154. Page 5-42 on taxes mentions utility deregulation. Would the new units be merchant plants or rate-based?

155. The sentence starting on Page 5-43 line 39 is too speculative and should be deleted.

156. Sections 5.5.3.4 and 5.5.3.5 should assess the impact on recreation and local housing if there is a nuclear accident at the facility.

157. Section 5.5.3.5 should assess the impact on local housing values from the proposed project.

158. The section in 5.5.3.6 on Police, Fire, and Medical Services is flawed. It states that patients travel to Spotsylvania for hospitalization, but in reality is no hospital there.

159. The fact that there are no hospitals in the three closest counties (Orange, Louisa, and Spotsylvania) should weigh heavily against the proposed facility. How far is the nearest hospital?

160. Sections 5.9 and 5.10 do not provide sufficient analysis on the impact of upset conditions. Even though these are low probability occurrences the impacts would be large.

161. The paragraph on page 5-70 line 14 would benefit from simpler language.

162. More than three years of meteorological data should be used in Section 5.10.1.

163. "The probability of a severe accident without the loss of containment" mentioned on page 5-74 line 22 is just slightly less than the probability of winning the Lotto South jackpot.

164. The mitigation measures listed on page 5-84 should be stipulated to.

165. Section 6.0 should include a statement of the government subsidies and tax incentives that are provided for nuclear fuel production, fuel and waste transport, and waste disposal.

166. The DEIS should include a statement of the amount of government funds that are available for the North Anna ESP process.

167. No credence can be put into Section 6.2.4 and the conclusion that the impacts are SMALL given the starting statement of "considering the uncertainties in the data and computational methods".

168. Section 6.0 should include an analysis of nuclear waste disposal.

169. The introduction to Cumulative Impact section states on Page 7-1 line 22 that "if a resource is regionally declining or imperiled, even a SMALL individual impact could be important it if (sic) contributes to or accelerates the overall resource decline." This situation certainly applies to regional transportation and roads, yet this is ignored in the DEIS.

170. The list of alternatives in Section 8 should include the following:
    a. Life extension of the existing two North Anna reactors
    b. Retirement of the existing two North Anna reactors
    c. Constructing the new reactors and radioactive material storage underground to increase security against an air attack
    d. Non-nuclear generation sources

171. It is hard to reconcile the statement on page 8-2 line 36 that "WHTF conditions could extend into approximately 19 percent of the main body of the lake" with the SMALL impact designation for this parameter.

172. The lack of significant variance among the alternatives I Table 9-1 make the impact analysis process and quantification scale suspect.

173. In Table 10-3 the impacts listed for the No-Action Alternative should be "NONE" not "SMALL".

174. An EIS is supposed to be prepared by an independent multi-disciplinary team. To what extent did the NRC commission any independent environmental reviews above the data presented in Dominion's ER? This is not clear from Appendices A and B and the cited references.

175. For a project of this magnitude it seems that one public hearing in one location is insufficient to provide the public an opportunity to get educated and provide comments. I know that I personally was unable to attend the revised hearing date due to work requirements. I again restate my request for another public hearing on the DEIS.

176. Based on the above review, I believe that the document is substantially flawed and request that these comments and others be fully addressed and that another DRAFT EIS be released. Unless such an action is taken, concerned citizens and local governments (and indeed the NRC since it is supposed to be relying on the DEIS for decision-making) cannot make informed decisions about the proposed project.

177. The flaws in the document do not provide the scientific, legal, or policy background to support a finding to recommend the ESP.

I am available to clarify any of these comments. Thank you for your consideration.

Sincerely,

Aviv Goldsmith
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COMMONWEALTH of VIRGINIA

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March 3, 2005

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RE: Draft Environmental Impact Statement for an Early Site Permit at the North Anna ESP Site
DEQ-04-216F

Dear Mr. Lesar:

The Commonwealth of Virginia has completed its review of the Draft Environmental Impact Statement indicated above ("Draft EIS"). The Department of Environmental Quality is responsible for coordinating Virginia's review of federal environmental documents and responding to appropriate federal officials on behalf of the Commonwealth. The following agencies joined in this review:

Department of Environmental Quality ("DEQ")
Department of Game and Inland Fisheries
Department of Agriculture and Consumer Services
Department of Conservation and Recreation
Marine Resources Commission
Department of Historic Resources
Department of Mines, Minerals, and Energy
Department of Forestry

In addition, the following agencies, planning district commissions, and localities were invited to comment:

Department of Health
Department of Transportation
RADCO Planning District Commission

ESP Review Complete

E-RIDS=ADM-03
cc = J. Cushing (JXC9)
A. Williamson (AKW1)

Template = ADM-013

Thomas Jefferson Planning District Commission
Rappahannock-Rapidan Planning District Commission
Louisa County
Orange County
Spotsylvania County
Town of Mineral.

First, we appreciate the efforts of Nuclear Regulatory Commission (NRC) staff in visiting reviewing agencies in Richmond for a discussion of the Early Site Permit process and related matters on January 19, 2005. The meeting was helpful to reviewers of the Draft EIS. We also appreciate the holding of the Public Hearing for this review on February 17.

The availability of the Draft EIS and the public hearing were announced in the Federal Register on December 10, 2004 (Volume 69, Number 237, pages 71854-71855).

Project Description

Dominion Nuclear North Anna, LLC ("applicant" or "Dominion") has applied to the Nuclear Regulatory Commission for an Early Site Permit at the North Anna Power Station site at Lake Anna. The Draft EIS considers the applicant's proposed site for two new nuclear reactor units. The proposed site is in Louisa County near Mineral, on the existing North Anna Power Station site which is on a peninsula on the southern shore of Lake Anna about 5 miles upstream from the North Anna Dam. The applicant is considering adding the new units to the two that are in place. Cooling water for the third unit would be drawn from the Lake; the fourth unit would use dry cooling towers (Draft EIS, pages 1-5 and 1-6, section 1.2). Three additional sites are considered in the Draft EIS: one is at the applicant's Surry Power Station in Surry County, Virginia; a second is at a U.S. Department of Energy site in Ohio; and a third site is at a Department of Energy site in South Carolina (Draft EIS, page 1.6, section 1.4; see also Chapter 8). The Nuclear Regulatory Commission's Early Site Permit would, if issued, allow the applicant to "reserve" the site for as long as 20 years for a new nuclear power unit, and possibly to undertake site preparation and preliminary construction activities (Draft EIS, page 1-1, section 1.1).

Based on the applicant's proposal to add two nuclear reactors to the site, the NRC has defined "bounding plant parameters' within which a future site design would be developed. The applicant has not selected a specific plant design for the new units, but will work within the "plant parameter envelope" ("PPE") to develop the early site permit. The early site permit ("ESP") will include a site redress plan, if issued (Draft EIS, page 1-5, section 1.2).

Environmental Impacts and Mitigation

1. Natural Heritage Resources. The Department of Conservation and Recreation has searched its Biotics Data system for occurrences of natural heritage resources in the project area. "Natural heritage resources" are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, significant geologic formations, and similar features of scientific interest. According to the Department of Conservation and Recreation, natural heritage resources have been documented in the project area. However, due to the scope of project activity and the distance to the resources, the Department of Conservation and Recreation does not anticipate that the activities pursuant to the Early Site Permit would adversely affect these natural heritage resources.

Under a memorandum of agreement between DCR and the Department of Agriculture and Consumer Services (VDACS), DCR represents VDACS in commenting on potential project impacts on state-listed threatened and endangered plant and insect species. VDACS has regulatory authority to conserve rare and endangered plant and insect species. The proposed project will not adversely affect such species, according to DCR. VDACS confirms this statement.

Because new and updated information is continually added to the Biotics Data System, NRC or the applicant should contact the Department of Conservation and Recreation's Division of Natural Heritage (Christopher Ludwig, telephone (804) 371-6206) for updated information if a significant amount of time passes before the foregoing information on natural heritage resources is used.

See also item 8, below.

2. Air Quality. According to DEQ's Division of Air Program Coordination, Spotsylvania County, one of the localities touching Lake Anna and potentially affected by this project, is designated for ozone non-attainment status under the Clean Air Act. For this reason, precautions are necessary to restrict emissions of volatile organic compounds (VOCs) and oxides of nitrogen (NO_x) in undertaking project activities.

During construction, fugitive dust must be kept to a minimum by using control methods outlined in 9 VAC 5-50-60 et seq. of the Regulations for the Control and Abatement of Air Pollution. These precautions include, but are not limited to, the following:

- Use, where possible, of water or chemicals for dust control;
- Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;

- Covering of open equipment for conveying materials; and
- Prompt removal of spilled or tracked dirt or other materials from paved streets and removal of dried sediments resulting from soil erosion.

In addition, if project activities include the burning of any material, this activity must meet the requirements of the Regulations for open burning (9 VAC 5-40-5600 et seq.), and it may require a permit (see "Regulatory and Coordination Needs," item 1, below). The Regulations provide for, but do not require, the local adoption of a model ordinance concerning open burning. The NRC or the applicant should contact appropriate local officials to determine what local requirements, if any, apply to open burning. The model ordinance includes, but is not limited to, the following provisions:

- All reasonable effort shall be made to minimize the amount of material burned, with the number and size of the debris piles;
- The material to be burned shall consist of brush, stumps and similar debris waste and clean-burning demolition material;
- The burning shall be at least 500 feet from any occupied building unless the occupants have given prior permission, other than a building located on the property on which the burning is conducted;
- The burning shall be conducted at the greatest distance practicable from highways and air fields;
- The burning shall be attended at all times and conducted to ensure the best possible combustion with a minimum of smoke being produced;
- The burning shall not be allowed to smolder beyond the minimum period of time necessary for the destruction of the materials; and
- The burning shall be conducted only when the prevailing winds are away from any city, town or built-up area.

3. Water Quality and Wetlands.

(a) Wetlands. The Draft EIS states, "a few small wetlands and two intermittent streams exist on the North Anna ESP site" (page 4-7, section 4.4.1), but no wetland delineation of the area has been accomplished. The Draft EIS also states, in several different places, that avoidance and minimization of wetland impacts will be practiced to the maximum extent practicable. Given the above information, however, DEQ cannot determine whether project activities would adversely affect wetland or stream areas subject to DEQ water permitting jurisdiction. For this reason, DEQ recommends that the applicant submit the following:

- a National Wetland Inventory (NWI) map identifying the project area;

- photographs of the intermittent streams;

- a confirmation of the wetlands delineation by the Army Corps of Engineers; and

- any other information pertaining to the location of wetlands or streams in or near the project area.

See "Regulatory and Coordination Needs," item 2, below.

(b) Permitting Guidance. Applicable regulations require a Virginia Water Protection (VWP) Permit as follows. If the activities to be pursued under the Early Site Permit involve one or more of those listed here, the applicant must apply to DEQ for a permit; see "Regulatory and Coordination Needs," item 2, below.

Except in compliance with a VWP permit, no person shall dredge, fill, or discharge any pollutant into, or adjacent to surface waters, or otherwise alter the physical, chemical, or biological properties of surface waters, excavate in wetlands, or ...conduct the following activities in a wetland:

1. New activities to cause draining that significantly alters or degrades existing wetland acreage or functions;
2. Filling or dumping;
3. Permanent flooding or impounding; or
4. New activities that cause significant alteration or degradation of existing wetland acreage or functions.

(See the VWP permit program regulations, 9 VAC 25-210-50.A.)

In the permit application review process, DEQ will evaluate the following, *inter alia*:

- Avoidance of wetland impacts;
- Minimization of wetland impacts;
- Amount, type, and location of compensatory wetland mitigation, based on the ecologically preferable alternative.

4. Water Resources: Flows, Drought, and Supply. The Draft EIS analyzes water resource and quality impacts considering the addition of the proposed Unit 3 as a once-through water-cooled unit and Unit 4 as a dry-cooled unit having negligible effects on water supply (page 5-3, section 5.3). DEQ's Division of Water Resources commented previously in regard to its concerns for the adequacy of Lake Anna as a source of cooling water for a third nuclear reactor; these concerns remain.

(a) Flows and Drought. Earlier discussions between the applicant, DEQ, and the Department of Game and Inland Fisheries resulted in the selection of 248 feet above sea level as the Lake Anna water level elevation that is representative of a hydrologic drought. Based upon historical data, this level would have a recurrence interval of once every 8.7 years, and it was agreed upon as being indicative of drought conditions. This matches closely other commonly used drought indicators (e.g., 7Q10) as an indicator of drought conditions in streams for water quality and discharge permit conditions. Table 1 (Draft EIS, page F-102) can be used to evaluate the recurrence intervals of droughts. The USGS publication referenced in that table discusses drought recurrence intervals ranging from once every 15 to once every 80 years. Using elevation 248 as an indicator, past Dominion records demonstrate that this level has been observed 3 times in the last 26 years, a reasonable expectation of the recurrence interval (8.6 years) for a drought. Addition of Unit 3 would increase the drought recurrence interval to every 2.6 years and more than double the total weeks of flows that are 20 cubic feet per second (cfs) or lower from 67 to 143. Median duration of drought flows of 20 cfs would be 7 weeks with the proposed Unit 3. Virginia State Water Control Board Bulletin #58 reviewed flow statistics for the gauge downstream at Doswell. Prior to dam construction, flows of 25 cfs or lower would occur once every 10 years for about 10 weeks. Addition of Unit 3 would significantly increase the frequency of drought flows downstream, and the duration of those droughts. The change to drought flows once every 2.6 years, for median duration of 7 weeks, is a significant change from conditions prior to the plant/reservoir construction (see item 4(b), below), and demonstrates the need for cumulative analysis of impacts.

(b) Water Supply. One of the major earlier concerns of DEQ's Division of Water Resources was the lack of an identifiable source of water for the proposed fourth reactor (Unit 4). The applicant has indicated, according to the Division, that the proposed Unit 4 would be air-cooled (see Draft EIS, page 5-3, section 5.3 as well); the Division would have no objection to an air-cooled unit. However, the fact that the fourth unit would be air cooled does not allay the Division's concern about the adequacy of Lake Anna as a water supply for a third nuclear reactor. The Division looked at other nuclear reactors along the East Coast to compare the water resources available to them with the water resources available at North Anna (see "Table 1," first enclosure to this letter). The conclusions drawn from that research are:

- Most of the intake locations are tidal and have an essentially unlimited water supply;

- Of the remaining locations, the North Anna location has the least abundant water supply, based on the average flow of a small watershed (342 square miles) and a medium-sized reservoir; and

- There is a limited number of nuclear power stations located on non-tidal rivers. In these cases, the power plants are on large rivers such as the Connecticut and the Susquehanna.

In fact, the only location remotely similar to North Anna's situation is the Oconee plants on Lake Keowee in South Carolina. However, immediately below Lake Keowee is Hartwell Lake, so the section of non-tidal stream affected by consumptive loss is very short.

(c) Cumulative Impacts and Downstream Effects. Cumulative impacts of the current and future units on downstream hydrology and biology need to be quantitatively evaluated before any determination can be made that effects of the proposed addition of reactors to the site are "small" (page 5-10, section 5.3.2, line 9). Two options exist to reduce the significant impacts on downstream resources, according to the Department of Game and Inland Fisheries:

- Change the trigger level of elevation (248 feet) to some lower elevation that has a recurrence interval of once every 8.7 years, or

- Have Unit 3 operate under dry cooling conditions, as is proposed for Unit 4.

(d) Frame of Reference for Flows. The Department of Game and Inland Fisheries and DEQ's Division of Water Resources requested the applicant to perform an Index of Hydrologic Alteration (IHA) analysis of pre- and post-project flows below the dam (see Draft EIS, page F-122 through F-125 and the tables on pages F-126 through F-133). The two state agencies had pre-dam conditions in mind when they addressed "pre-project" conditions in their earlier discussions with the applicant. However, the tables on pages F-126 through F-133 do not evaluate pre-dam conditions and therefore cannot be considered complete. Table 1 (pages F-126 and F-127) demonstrates significant shifts in frequency of lower flows and needs to be expanded to address conditions prior to the creation of the lake. The Division of Water Resources clarifies that by "pre-project," it meant no dam and no reactors; by "post-project," it meant the lake and three once-through cooling units. This Indicators study was requested in order to assess the cumulative impact of the existing and proposed project activities on the North Anna River. A cumulative analysis of impacts of the project does not start, in our judgment, with the existing lake conditions (i.e., the lake and two reactors) and then add, incrementally, the effects of operation of the proposed third reactor (so that the "post-project" condition is the lake and three reactors). However, the Nuclear Regulatory Commission has accepted this approach, which means that a finding of no more than "moderate" impacts of the third unit (page 5-10, section 5.3.2, lines 7-13) is not surprising even if cumulative impacts have not been analyzed.

Dominion provided DEQ's Division of Water Resources (DWR) with the output of a simulation model with which Division staff is able to make some comparisons of true pre- and post-project conditions. Prior to the lake, the North Anna River at the dam site had an average flow of about 286 cubic feet per second (cfs). This is based on the flow records from 1929 to 1971 at the Doswell gauge, proportionately reduced to reflect the smaller drainage area at the dam. According to the NRC water budget analysis, the two existing units account for 50 cfs in evaporation and the third unit would account for 26 cfs in evaporation. The cumulative impact on the average flow of just the power plants (not including lake evaporation) is therefore estimated to be 76 cfs or 26% of the historic average flow. Such a large loss of the normal flow to consumptive uses is unprecedented in Virginia and other mid-Atlantic states. The U.S. Geological Survey (USGS) estimates that the average percentage of surface water lost to consumptive use in the mid-Atlantic states is 1.6% of average flow. (USGS, 1984, National Water Summary)

DWR examined pre-dam gauge records and compared those streamflow records with projected releases with three reactors operating in a once-through cooling mode. This is not a true IHA analysis but it is presented in order to give some perspective of the magnitude of true pre- and post-project conditions.

- Prior to the project, flows at the dam site were less than or equal to 20 cfs only 4.2% of the time; with the third unit, flows are projected to be 20 cfs 11.8% of the time.

- Prior to the project, flows at the dam site were greater than or equal to 156 cfs 52% of the time (pre-dam Doswell gauge); with three units, flows will be less than or equal to 40 cfs 52% of the time (Draft EIS, page 5-12, section 5.4.1.3),

- Prior to the project, during the driest 14-month period on record (early May 1931 to early July 1931) streamflow in the North Anna River averaged 90 cfs over the 14 months. With the three units, the driest 14-month period (mid- September 2001 through mid-January 2003) streamflow in the North Anna River would average only 20 cfs.

DWR disagrees with the conclusion in the Draft EIS that these pre- and post-project flow alterations and their impact can be described as small or moderate. Instead, DWR would characterize these types of alterations as large.

(e) Preferences in Cooling Method. DEQ's Division of Water Resources prefers the once-through cooling process proposed for Unit 3 to a cooling tower because the once-through process results in less consumptive use of water than the cooling tower. This preference would result in larger impingement and entrainment losses (see item 7(c), below) and a larger heat load to the Lake than the cooling tower. DEQ's Division of

Water Resources recognizes that the cooling tower is not proposed in the Draft EIS, but some commenters may propose it as a solution to thermal loading and impingement and entrainment concerns. In any case, DEQ's Division of Water Resources would defer to DEQ's Division of Water Quality in regard to thermal impacts of any water-cooled units that might be proposed.

The once-through cooling process would also entail larger impingement and entrainment losses. DEQ's Division of Water Resources defers to the Department of Game and Inland Fisheries with regard to impingement and entrainment estimates; see item 8(c), below.

(f) Alternatives Analysis: Surry Power Station site versus North Anna site. The Draft EIS indicates that a first-stage of examination aims to determine whether any alternative site is environmentally preferable to the proposed site. Based on the results of this review, the NRC examines alternatives for other factors and decides whether an alternative site is "obviously superior" to the proposed site (Draft EIS, page 8-1). DEQ's Division of Water Resources believes that the Surry site is "superior" (as described in the Draft EIS) to the North Anna site based on the following reasons:

- the limited water resources in the North Anna River watershed;
- the amount of those resources that are already being consumed by lake evaporation and the forced evaporation from the existing two reactors; and
- the competition for those resources downstream.

It appears that water availability would not be an issue on the tidal James River at Surry. The Draft EIS says, "The consumptive use of water to support mechanical draft cooling towers would be undetectable relative to the supply in the estuary."

At two meetings with DEQ staff, NRC officials were asked why North Anna rather than Surry was being proposed for an early site permit. On both occasions, NRC staff cited aesthetics and the fact that the plant might be visible from Jamestown. However, the Draft EIS, in its discussion of aesthetics (pages 8- 32 and 8-33), does not indicate that there is any problem with aesthetics at Surry. In fact, the Draft EIS states that the Surry plant's "current structures are not visually obtrusive from any vantage point, even from across the James River. However Units 1 and 2 are visible from the highest amusement rides at Busch Gardens" (page 8-32). The concerns about aesthetics are not supported by statements in the Draft EIS.

Impingement and entrainment issues would be a greater problem at the Surry site than at Lake Anna. This is because the James River is an estuary at the Surry site.

However, the alternatives section states that reactors at Surry would be cooled with cooling towers (Draft EIS, page 8-15, section 8.5). As such, the impingement and entrainment problem would be less than if once-through cooling were to be used. On April 4, 2001, Dr. John Olney of Virginia Institute of Marine Resources wrote to Mr. Tony Banks of Dominion Power on the subject of impingement and entrainment at Surry while commenting on the re-licensing of the plant. In the letter Dr. Olney states, "Further, the available information on abundance and distribution of fishes at the site suggests that there is a low probability that water withdrawals at the plant are causing declines in federally managed species." Since Dr. Olney does not express concerns about a large once-through cooling water withdrawal, it appears that a cooling tower withdrawal, orders of magnitude smaller, would also not be a concern.

In conclusion, based on the information provided, two of the most important disadvantages of the Surry site (impingement and entrainment, and aesthetics), are not substantiated, while the main disadvantage of the North Anna site (water availability) appears extremely problematic. The DWR would have no concerns about this project if both the fourth and third reactors at North Anna were air cooled.

5. Solid and Hazardous Waste Management. According to DEQ's Waste Division, the Draft EIS addressed solid waste issues and sites to some extent, but did not address hazardous waste issues or sites, or include a search of waste-related data bases.

(a) Data Base Results. DEQ's Waste Division did a cursory review of its data files and determined that the North Anna Power station is listed as follows:

- "Vepco-North Anna" (identification number VAD000620237) in the CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act) data base; no further remedial action is planned, according to the CERCLA listing.

- "Virginia Power North Anna" (identification number VAD065376279) in EPA's RCRA (Resource Conservation and Recovery Act) data base, as a small-quantity generator of hazardous waste.

The following web sites may be helpful in locating additional information for these identification numbers:

- http://www.epa.gov/echo/search_by_permit.html

- http://www.epa.gov/enviro/html/rcris/rcris_query_java.html.

(b) Solid Wastes. The Draft EIS indicates that solid waste would be handled in compliance with appropriate state and federal regulations (page 3-10, section 3.2.4). See the citations in item 5(c), next.

(c) Radioactive or Other Contaminated Waste. The Draft EIS indicated the potential risk of radioactive waste occurring on site after construction (pages 4-39, 4-40, 6-22, and 8-12). Any soil suspected of radioactive wastes or other contamination generated during construction-related activities (including site preparation) must be tested and disposed of in accordance with applicable federal, state, and local laws and regulations. These include, but are not limited to:

- Federal laws and regulations: Resource Conservation and Recovery Act (RCRA) (42 U.S.C. sections 6901 et seq.); U.S. Department of Transportation Rules for Transportation of Hazardous Materials (49 CFR Part 107); applicable regulations in Title 40, Code of Federal Regulations (CFR).

- State laws and regulations: Virginia Waste Management Act (*Virginia Code* sections 10.1-1400 et seq.); Virginia Hazardous Waste Management Regulations (9 VAC 20-60); Virginia Solid Waste Management Regulations (9 VAC 20-80); Virginia Regulations for the Transportation of Hazardous Materials (9 VAC 20-110).

(d) Demolition and/or Renovation of Structures. The discussion of the Site Redress Plan (Draft EIS, page 4-46) raises the potential for structures to be demolished or removed. These should be checked for lead-based paint and asbestos before any action takes place. If lead-based paints are found, NRC or the applicant must comply with the rules in the Virginia Hazardous Waste Management Regulations (9 VAC 20-60-261); if asbestos-containing materials are found, compliance with the Virginia Solid Waste Management Regulations (9 VAC 20-80-640) is required.

(e) Pollution Prevention. DEQ encourages NRC and the applicant to implement pollution prevention principles in all construction activities. This includes reducing wastes at the source, re-using materials, and recycling waste materials. Generation of hazardous waste should be minimized, and hazardous waste should be handled appropriately in keeping with the rules cited in item 4(c) above. See also item 9, below.

6. Erosion and Sediment Control; Stormwater Management.

(a) Erosion and Sediment Control Plans. If any activities pursuant to the Early Site Permit will disturb 10,000 square feet or more, the property owner is responsible for submitting a site-specific Erosion and Sediment Control Plan to the affected County for review and approval pursuant to the local Erosion and Sediment Control ordinance,

according to the Department of Conservation and Recreation. All regulated land-disturbing activities associated with the project, including on- or off-site access roads, staging areas, or spoil or borrow areas, must be covered by an approved Plan. The Plan, in turn, must be prepared and implemented in accordance with the Virginia Erosion and Sediment Control Law (*Virginia Code* section 10.1-563), the Virginia Erosion and Sediment Control Regulations (see 4 VAC 50-30-30, 4 VAC 50-30-100), and the *Virginia Erosion and Sediment Control Handbook*, which aids the project proponent in meeting the legal and regulatory requirements. See "Regulatory and Coordination Needs," item 5(a), below.

(b) Stormwater Management Plans. Depending on local requirements, a separate Stormwater Management Plan may also be required for land-disturbing activities. Stormwater Management Plans must be prepared and implemented in accordance with the Virginia Stormwater Management Law (*Virginia Code* section 10.1-603.3) and the Virginia Stormwater Management Regulations (4 VAC 3-20-90 through 3-20-141). See "Regulatory and Coordination Needs," item 5(b), below.

General information on recent changes to stormwater management requirements is available at the Department of Conservation and Recreation's web site:

- http://www.dcr.virginia.gov/sw/vsmp.htm#geninfo.

These changes include transfer of a related stormwater management program, the Virginia Pollutant Discharge Elimination System (VPDES) Stormwater General Permit for Construction Activities, from the Department of Environmental Quality to the Department of Conservation and Recreation. See "Regulatory and Coordination Needs," item 5(c), below.

7. Historic Structures and Archaeological Resources. The Nuclear Regulatory Commission is consulting directly with the Department of Historic Resources pursuant to section 106 of the National Historic Preservation Act. The Department expects this consultation to continue.

8. Wildlife Resources.

(a) Department of Game and Inland Fisheries Powers and Duties. The Department of Game and Inland Fisheries, as the Commonwealth's wildlife and freshwater fish management agency, exercises enforcement and regulatory jurisdiction over wildlife and freshwater fish, including state or federally listed endangered or threatened species, but excluding listed insects. The Department (hereinafter "DGIF") is a consulting agency under the U.S. Fish and Wildlife Coordination Act (16 U.S.C. sections 661 et seq.), and provides environmental analysis of projects or permit

applications coordinated through the Department of Environmental Quality, the Marine Resources Commission, the Virginia Department of Transportation, the U.S. Army Corps of Engineers, the Federal Energy Regulatory Commission, and several other state and federal agencies. DGIF determines likely impacts upon fish and wildlife resources and habitat, and recommends appropriate measures to avoid, reduce, or compensate for those impacts.

(b) Department of Game and Inland Fisheries Assessment. DGIF continues to have reservations about the impacts of proposed Unit 3 on the lake and downstream resources. The Draft EIS does not address the main concerns outlined in the DGIF letter, dated January 27, 2004.

The nomenclature of the Draft EIS on native vs. non-native species appears to minimize the value of the striped bass fishery (Draft EIS, section 2.7.2.1, pages 2-33 through 2-40). Striped bass and other anadromous fish are native to the York River drainage and the North Anna River, while largemouth bass, bluegill, black crappie, walleye, and channel catfish are not. Nevertheless, all of these species are important to the recreational fishery in the lake.

(c) Impingement and Entrainment: Estimates. The Department of Game and Inland Fisheries (DGIF) applauds the applicant's use of "worst case" scenarios for estimating impingement and entrainment, and acknowledges the estimate of a 131% increase in the impingement rate for Unit 3 (Draft EIS, pages 5-13 through 5-18, sections 5.4.2.1 and 5.4.2.2). In developing the total estimate, data derived from 1979 through 1983 was added to worst-case Unit 3 operation. However, it is not clear whether the 1979-1983 values for Units 1 and 2 reflect current operating conditions and are valid. The Final EIS should indicate whether water volume pumped for these units has increased or decreased since the 1979-1983 study period, in light of the facts that plant operating time, efficiency, and volume of water pumped have all increased. In such case, the table reflecting the impacts of Units 1 and 2 (Table 5-1, page 5-17) needs to be revised to reflect current operating conditions.

(d) Entrainment and Impingement Recommendations. The Department of Game and Inland Fisheries recommends the use of state-of-the-art intake screens, as encouraged by the U.S. Environmental Protection Agency in recent screen recommendations. Specifically, the Department of Game and Inland Fisheries recommends openings of 1 millimeter (mm), and an intake velocity of 0.25 feet per second (fps) to protect aquatic life. This would greatly alleviate the impingement and entrainment issue, as would the use of a dry cooling tower.

(e) Presentation of Data. As indicated above (item 4(d)), the "pre-project" conditions should be based on the condition of the area before the lake and dam were

constructed in the 1970s. Table 1 in Appendix F (pages F-126 and F-127) is one example of this; it demonstrates significant shifts in frequency of lower flows and needs to be expanded to address conditions prior to creation of the lake.

(i) Tables in Chapter 5. The tables in Chapter 5 of the Draft EIS have several problems. Tables 5-4 through 5-6 (pages 5-22 through 5-24) reflect seasonal losses from March through July, so the "Yearly Totals" column is not appropriately named. To properly reflect yearly totals, losses for the remaining seven months need to be added to the table. If summer, fall, and winter data were not collected, that data may have to be extrapolated by the best fitting of a non-linear function to the available data. Only then can the full impacts of entrainment on important fish species begin to be addressed.

Tables 5-2 (page 5-18) and 5-5 (page 5-23) may have significant errors, or the reasons for the differences are not fully explained. For example, in Table 5-2, for Unit 3, January striped bass and bluegill numbers impinged are greater than in Units 1 and 2 (Table 5-1, page 5-17), but black crappie, gizzard shad, white perch, and yellow perch numbers are less than in Units 1 and 2. Similar discrepancies exist for other rows in the table, and for the cumulative Tables 5-3 and Table 5-6. These discrepancies should be explained further.

(ii) Characterization of Impacts on Fisheries. The Department of Game and Inland Fisheries disagrees with the assessment that the impact of Unit 3 upon gizzard shad, the most prevalent species, would be a "small" impact (page 5-21, end of section 5.4.2.2). As DGIF states:

> Gizzard shad are indeed a "prolific forage fish," but their abundance has been low in VDGIF samples in two recent years. This species is the primary forage for stocked pelagic predators (striped bass and walleye) and also supplements largemouth bass diet. Further declines in striped bass habitat (another contested issue) combined with potential reductions in the forage base could significantly impact this recreationally and economically important fishery. Section 5.4.2.2 estimates the impingement loss to the fish population as a percentage of the estimated total lake population as derived from cove rotenone. We applied this same technique to entrainment numbers and calculate that 6.8% of the gizzard shad and 87% of the black crappie are lost due to entrainment. When combined with impingement 7.7% of the gizzard shad and 93.9% of the black crappie numbers are killed by the intake structure. We do not consider losing almost 8 and 94% of these populations from an intake a small impact. Several problems exist with this approach and these need to be addressed. Lakes undergo eutrophication with age and that is occurring at Lake Anna as the watershed becomes more fully developed. As that occurs, the biomass of fish increases. The current biomass is undoubtedly higher than twenty years ago when the original entrainment/impingement analysis was conducted. The report uses cove rotenone data but does not account for spatial and temporal variation within that data. Within large reservoirs, biomass typically declines downstream through a trophic gradient. That is apparent from our routine sampling as well as historic rotenone data. The impacts of entrainment and

> impingement may be even more spatially and numerically significant in the lower lake where the numbers of fish are less than above the Rt. 208 bridge.

The Department points out that the conclusions regarding entrainment losses in the Draft EIS are not based on scientifically sound evidence. This is exemplified by the statement:

> Because the fish entrained most frequently are prolific, exhibit a high reproductive potential, and compensatory responses of the fish population occur to offset losses, the staff concludes that the impacts of entrainment would be SMALL [emphasis in the original].

(See Draft EIS, page 5-25, end of section 5.4.2.3.)

(iii) Recommendations. The Department of Game and Inland Fisheries recommends that the entrainment tables be corrected to reflect an actual annual loss. The discrepancies should be corrected and a much more rigorous spatial and temporal evaluation conducted before any conclusion can be reached that the effects of impingement and entrainment are small.

(f) Striped Bass Reservoir Habitat.

(i) Description and Habitat. The Department of Game and Inland Fisheries agrees with the descriptive statements on page 5-30, lines 24-33 of the Draft EIS. However, line 37 incorrectly states that striped bass are not native to this watershed. The use of nomenclature surrounding native vs. nonnative species appears to minimize the value of the striped bass fishery. This is incorrect. Striped bass are, in fact, native to the York River drainage and downstream reaches of the North Anna can be seasonally important for spawning and juvenile rearing. The lake population is correctly acknowledged as being supported by stocking. In recognition of this fact, the Department of Game and Inland Fisheries strives to stock Chesapeake strain striped bass in the reservoir so as not to change the genetics of downstream populations.

(ii) Impacts of Temperature and Flow Changes. An extensive amount of temperature data from historic monitoring of the lake was used to model thermal conditions at various locations in the lake. Despite that extensive data set, no modeling of summer striped bass habitat was conducted to support statements that the impacts would be small in normal years and moderate in drought years (Draft EIS, page 5-31, lines 18-19). In combination with the elevated temperatures and increased frequency of drought conditions (lowering to elevation 248) within the lake, the striped bass population could be stressed every 2.6 years. Based on the information in the Draft EIS, it is inconclusive whether the installation of a third unit *would* cause acute mortality from exacerbated summer habitat squeeze. It is also inconclusive, however, that such mortality *would not* occur. At some point, striped bass will begin to die as water quality declines (based primarily on higher water temperatures and lower dissolved oxygen).

Since no modeling of summer habitat was conducted, it is unknown whether the additive impacts of a third unit would allow reservoir conditions to reach this point, and the exact point at which this will occur is unknown; but to discount the possibility is subjective. Even with the elimination of Unit 4, the predicted maximum surface temperature increase at the dam of 3.6 degrees Fahrenheit could result in striped bass mortalities depending on the plume configuration, inflow, and stratification pattern. Striped bass habitat modeling is essential in the Final EIS to explain the potential of a new (third) unit and its impact on striped bass habitat.

(iii) Drought Comment. The following comment in the Draft EIS regarding droughts, "In such circumstances, mitigation to reduce the impact could be accomplished by stocking more fish, stocking larger fish, or managing the fishery to provide more catch opportunities of large fish," is incorrect and not a scientifically recognized fishery management solution. Such a comment does not recognize the biological and physical factors necessary for a successful striped bass population.

(g) North Anna River Fishery Issues. According to the Department of Game and Inland Fisheries, the downstream impacts to fisheries resources were ignored in the Draft EIS in spite of the increased frequency of low flows that a third water-cooled unit would produce. Currently, (with two units in the regulated "base scenario"), 67 weeks of drought conditions (20 CFS or less) out of a 26-year period would be expected. Given the addition of a third unit, the expected drought frequency would rise to 150 weeks (about 2.6 years).

(i) Analysis of Flows. The Tennant method is a common desktop method and summer flows in the 20-30% mean annual flow (MAF) range are beneficial for sustainable fisheries. Because it has been called the Montana Method, it has been deemed as only applicable in Western streams. That misconception is false, as it was developed "over the past 17 years from work on hundreds of streams in the states north of the Mason-Dixon Line between the Atlantic Ocean and the Rocky Mountains" (Fisheries 1(4): 6-10). Summer flows below the desired level of 68 cubic feet per second (cfs), or 20% of MAF, are the norm under current conditions and will worsen under future conditions. The Department of Game and Inland Fisheries recommended that an In-stream Flow Incremental Methodology (IFIM) Study be conducted to properly evaluate this project on the stream fauna. The expected increased frequency of drought flows to a common occurrence (2.6 years) is expected to have significant impacts. Conclusions need to be based upon sound scientific modeling. DGIF states that if Dominion can offer a better approach to modeling flow impacts, that Department would be happy to consider any alternative.

(ii) Impacts on River Resources. According to DGIF, the Draft EIS makes the following statement:

> ... long-term monitoring of the North Anna River has documented improvements in the abundance and diversity of aquatic biota since impoundment.

DGIF is unaware of any intensive data analysis to support such an assertion. DGIF's analysis of the Dominion data set documented changes that are reflective of drought conditions. Placing the population of aquatic species under frequent drought stress will shift the community substantially. This analysis was previously provided to Dominion. Recent DGIF surveys of the North Anna River have suggested that the primary sportfish, smallmouth bass, has much lower abundances than in other rivers in the region. Other fish populations were present in relatively low levels. It is the opinion of DGIF biologists that the low abundance and biomass of predator and forage species in the North Anna River is related to higher than naturally occurring incidences of drought conditions. There also is the possibility that drought flow conditions could adversely impact downstream anadromous nursery areas. This potential impact should be evaluated. Increasing the drought frequency to the proposed extent would have an unacceptable negative impact on this fishery.

(iii) Modeling versus Speculation. The balance of a major argument within the document centers on subjective speculation on whether the installation of Units 3 and/or 4 would present complications for fish populations. DGIF believes that such complications would occur. More likely at issue is not if complications would occur, for they almost certainly would; but the extent of such complications and the population-level impacts. Without extensive modeling, it is impossible to argue either point successfully. We recommend the application of sound scientific modeling to the decision process and that appropriate corrections based on model outcomes be incorporated in the Final EIS.

9. Downstream Flows and Recreation. The North Anna River is a spectacularly scenic and remote canoeing river with excellent fishing, according to the Department of Conservation and Recreation. Accordingly, discharge rates from the Lake Anna Dam should be adequate to meet minimum in-stream flows needed for recreational boating from State Route 601 to U.S. Route 301. The Department of Conservation and Recreation recommends that a minimum in-stream flow recreation study be conducted to determine what this discharge rate should be.

10. Chesapeake Bay Preservation Areas. According to the Department of Conservation and Recreation's Division of Chesapeake Bay Local Assistance, the project area, which is in Louisa County (Draft EIS, page 2-5, section 2.2.1), is not within a Chesapeake Bay Preservation Act jurisdiction.

11. Pollution Prevention. DEQ advocates that principles of pollution prevention be used in all construction projects as well as in facility operations. Effective siting, planning, and on-site Best Management Practices (BMPs) will help to ensure that

environmental impacts are minimized. However, pollution prevention techniques also include decisions related to construction materials, design, and operational procedures that will facilitate the reduction of wastes at the source. We have several pollution prevention recommendations that may be helpful in constructing or operating this project:

- Consider development of an Environmental Management System (EMS). An effective EMS will ensure that the proposed facility is committed to minimizing its environmental impacts, setting environmental goals, and achieving improvements in its environmental performance. DEQ offers EMS development assistance and recognizes facilities with effective Environmental Management Systems through its Virginia Environmental Excellence Program.
- Consider designs, techniques, and technologies that will facilitate the re-circulation and re-use of waters used for cooling and steam generation. These techniques can save money by minimizing intake and treatment needs.
- Consider environmental attributes when purchasing materials. For example, the extent of recycled material content, toxicity level, and amount of packaging should be considered and can be specified in purchasing contracts.
- Consider contractors' commitments to the environment (such as an EMS) when choosing contractors. Specifications regarding raw materials and construction practices can be included in contract documents and requests for proposals.
- Choose sustainable materials and practices for infrastructure and building construction and design. These could include asphalt and concrete containing recycled materials, and integrated pest management in landscaping, among other things.
- Integrate pollution prevention techniques into facility maintenance and operation, to include the following: inventory control (record-keeping and centralized storage for hazardous materials), product substitution (use of non-toxic cleaners), and source reduction (fixing leaks, energy-efficient HVAC and equipment). Maintenance facilities should be designed with sufficient and suitable space to allow for effective inventory control and preventive maintenance.

DEQ's Office of Pollution Prevention provides free information and technical assistance relating to pollution prevention techniques and EMS. If interested, NRC and/or the applicant contact that Office (Tom Griffin, telephone (804) 698-4545).

12. Mineral Resources. The Department of Mines, Minerals, and Energy, noting that an early site permit allows a suitability study, has no comment. If the study is

conducted in the future, the Department requests that it be given an opportunity to review the material on geology and mineral resources of the site.

13. Forest and Tree Protection. According to the Department of Forestry, the activities pursuant to the Early Site Permit will not significantly affect the forests of the Commonwealth. We offer the following guidance for protection of individual trees, or forested areas, in the project vicinity.

In order to protect trees in the project area from the effects of construction activities associated with this project, the proponent should mark and fence them at least to the dripline or the end of the root system, whichever extends farther from the tree stem. Marking should be done with highly visible ribbon so that equipment operators see the protected areas easily.

Parking and stacking of heavy equipment and construction materials near trees can damage root systems by compacting the soil. Soil compaction, from weight or vibration, affects root growth, water and nutrient uptake, and gas exchange. The protection measures suggested above should be used for parking and stacking as well as for moving of equipment and materials. If parking and stacking are unavoidable, the applicant should use temporary crossing bridges or mats to minimize soil compaction and mechanical injury to plants.

Any stockpiling of soil should take place away from trees. Piling soil at a tree stem can kill the root system of the tree. Soil stockpiles should be covered, as well, to prevent soil erosion and fugitive dust.

Questions on tree protection may be directed to the Department of Forestry (Mike Foreman, telephone (434) 977-6555).

14. Local and Regional Concerns. As indicated above (pages 1 and 2), DEQ invited three regional Planning District Commissions, three Counties, and one Town to comment on the Draft EIS.

Regulatory and Coordination Needs

1. Air Quality Regulation. In the event any open burning is planned, the applicant must contact DEQ's Northern Virginia Regional Office (Terry Darton, telephone (703) 583-3845) to determine whether an open burning permit is required, and, if so, how to apply. Similarly, that Office should be contacted to determine permitting requirements applicable to any fuel-burning equipment used in construction or in buildings.

2. Water Quality Regulation. As indicated above ("Environmental Impacts and Mitigation," item 3(a)), the applicant must furnish information to DEQ's Northern Virginia Regional Office to obtain a determination of the need for a Virginia Water Protection Permit for wetland impacts from Early Site Permit activities. The information, listed in the above discussion, requires that a wetland delineation be accomplished in the areas which might be affected by Early Site Permit activities and that the applicant obtain Army Corps of Engineers confirmation of the delineation. This information should be submitted to:

DEQ, Northern Virginia Regional Office
Attn: Tom Faha, Water Permits Manager
13901 Crown Court
Woodbridge, Virginia 22193

Questions may be addressed to that Office (Tom Faha, telephone (703) 583-3846).

In addition, activities contemplated by the regulatory provision cited above (see "Environmental Impacts and Mitigation," item 3(b)) will require Virginia Water Protection Permits from DEQ's Northern Virginia Regional Office.

3. Subaqueous Bed Encroachment. Any encroachment in, on, or over state-owned riverbeds, or the state-owned beds of bays, streams, or creeks that is channelward of ordinary high (above the fall line) or channelward of mean low water (in tidal waterways below the fall line) may require a permit from the Marine Resources Commission. Questions may be addressed to the Commission in this regard (Jeff Madden, telephone (757) 247-2200).

4. Wildlife Resources: Endangered and Threatened Species. The NRC and the applicant should coordinate with the Virginia Department of Game and Inland Fisheries (Andy Zadnik, telephone (804) 367-2733) relative to a review of threatened and endangered species. Coordination with the Virginia Field Office of the U.S. Fish and Wildlife Service (Karen Mayne, telephone (804) 693-6694) would also be in order.

5. Erosion and Sediment Control; Stormwater Management.

(a) Erosion and Sediment Control Plan. The applicant should contact Louisa County authorities (starting with the County Administrator, C. Lee Linticum (telephone (540) 967-0401) to for guidance on submission of Erosion and Sediment Control Plans for project activities pursuant to the Early Site Permit, if it is issued.

(b) Stormwater Management Plan. The applicant should contact Louisa County authorities (see item 5(a), above) for guidance on submission of stormwater management plans for project activities under the Early Site Permit, if the permit is issued by NRC.

(c) Stormwater Management Changes. As indicated above ("Environmental Impacts and Mitigation," item 6(b)), the VPDES Stormwater General Permit for Construction Activities has been transferred from the Department of Environmental Quality to the Department of Conservation and Recreation. The applicant may contact the Department of Conservation and Recreation Division of Soil and Water Conservation (Mr. C. Lee Hill, telephone (804) 786-3998) for guidance on the transfer of the program and applicability of program requirements to land-disturbing activities.

6. Historic Structures and Archaeological Resources. As indicated above ("Environmental Impacts and Mitigation," item 7), NRC is consulting with the Department of Historic Resources (Dr. Ethel Eaton, telephone (804) 367-2323, extension 112) to ensure compliance with section 106 of the National Historic Preservation Act.

Thank you for the opportunity to review the Draft EIS. We look forward to reviewing the Final EIS for the North Anna Early Site Permit.

Sincerely,

Ellie L. Irons
Program Manager
Office of Environmental Impact Review

Enclosures

cc: (next page)

cc: Andrew K. Zadnik, DGIF
Keith R. Tignor, VDACS
Robert S. Munson, DCR
Alan D. Weber, VDH
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Kotur S. Narasimhan, DEQ-Air
Catherine M. Harold, DEQ-DWQ
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John D. Bowden, DEQ-NVRO
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Stephen H. Manster, RADCO PDC
Harrison B. Rue, Thomas Jefferson PDC
Mark VandeWater, Rappahannock-Rapidan PDC
Lee Linticum, Louisa County
Ted Coberly, Orange County
Randall Wheeler, Spotsylvania County
Jim Candeto, Town of Mineral
Jack Cushing, NRC
Judson I. White, Dominion Virginia Power Co.

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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Secretary of Natural Resources

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Subject: Comments on the Nuclear Regulatory Commission's Draft Environmental Impact Statement for an Early Site Permit for the North Anna Nuclear Power Station.

To: Charles Ellis, Office of Environmental Impact Review

From: Joseph P. Hassell, Division of Water Resources Joseph P. Hassell

Date: March 1, 2005

Thermal Loading, Impingement and Entrainment

The Division of Water Resources (DWR) has minor comments on the thermal loading, impingement and entrainment issues as they relate to water use at the Lake Anna site. The Draft Environmental Impact Statement (DEIS) considers the issuance of an Early Site Permit (ESP) for a third reactor cooled by a once through cooling process. The DWR prefers the once through cooling process to a cooling tower because it results in less consumptive use of water. The DWR recognizes that our preference for a once through cooling process and its accompanying smaller water loss entails larger impingement and entrainment losses and a larger heat load to the Lake. While we understand that Dominion and the NRC are not proposing a cooling tower, the technique is extensively discussed in the DEIS and some commenters may propose a cooling tower as a solution to the thermal loading, impingement and entrainment issues. We defer to the DEQ Division of Water Quality on the thermal loading issue and to the Department of Game and Inland Fisheries on the impingement and entrainment issue.

Water Availability

On January 15, 2004, the DWR commented on the draft application for the Early Site Permit. The Division's concerns have not all been fully addressed.

One of our major concerns was the lack of an identifiable source of water for the proposed fourth reactor. We now understand from Dominion that the fourth reactor would be air-cooled. The DWR has no objection to the fourth unit if it is air cooled.

The Division is still concerned about whether the Lake Anna watershed can provide sufficient cooling water for the third reactor without unacceptably harming instream beneficial uses. We looked at other nuclear reactors along the East Coast and compared the water resources available to those reactors with the water resources available at North Anna.

Table 1 Eastern Seaboard Nuclear Reactors and their Water Sources.[1]

Name, State,	Water Source, Availability
Brunswick, NC	Mouth of Cape Fear River, UWS
Calvert Cliffs, MD	Chesapeake Bay, UWS
Catawba 1 & 2, SC	Lake Wylie, SC, DA =3050. QAV=4238
Fitzpatrick, NY	Lake Ontario, UWS
Harris 1&2, NC	Jordan Lake DA = 1689, 14000 acres
Hatch 1&2, GA	Altamaha River, DA= 11600, QAV=11580 cfs. Minimum recorded flow= 1620 cfs, Hatch consumes 50 cfs or 0.44% of QAV
Hope Creek 1, NJ,	Lower Alloways Creek, tidal tributary of Delaware River, UWS
Indian Point 2 & 3, NY	Tidal Hudson River, UWS
Limerick 1 & 2, PA	Schuykill River DA =1760
Maine Yankee, ME	Tidal Montsweag Bay, UWS
Millstone, CT	Long Island Sound, tidal UWS
North Anna, VA	L. Anna, DA = 342, QAV= 286, MIF = 20, North Anna 1 and 2 consume 47.2 cfs, Lake evaporation consumes 55.6 cfs, Total consumption equals 36% of QAV
Oconnee 1,2&3, SC	Lake Keowee, DA ≈300 - 400
Pilgrim 1, MA,	Plymouth Harbor, Tidal, UWS
St. Lucie 1&2, FL	Tidal Indian River near Port Saint Lucie, UWS
Seabrook, NH	Atlantic Ocean, UWS
Summer, SC	Parr River, QAV= 4000
Surry 1&2, VA	Tidal James River, UWS
Susquehanna 2, PA	Susquehanna River, DA >10,000, QAV >13500
Turkey Point 3 & 4, FL	Biscayne Bay tidal, UWS
Vermont Yankee, VT	Connecticut River, DA =10000
Vogtle1 &2 GA	Savannah River, DA = 7500

1. Abbreviations:
   UWS – Unlimited water supply
   DA – Drainage Area of water supply in square miles
   SA – Surface Area of the Lake in acres
   QAV – Average flow of water source in cubic feet per second

The majority of the intake locations are located tidal waters and have an essentially unlimited water supply. The nuclear power stations located on non-tidal rivers are sited on very large rivers including the Savannah, the Connecticut, the Susquehanna and the Schuylkill. Of the remaining locations, North Anna has the least abundant water supply due to it's small watershed (only 342 square miles) and medium sized reservoir. The only location remotely similar to North Anna's situation is the Oconee plants on Lake Keowee in South Carolina. However, immediately below Lake Keowee is Hartwell Lake so the section of non-tidal stream effected by consumptive loss is very short.

We requested that Dominion perform an Index of Hydrologic Alteration (IHA) analysis of pre-and post-project flows below the dam. The information provided by Dominion and the NRC staff defined "pre-project" as the Lake and two reactors and "post-project" to be the lake and three reactors. The DEIS on page 7-2 says, "A cumulative evaluation of the effects of Units 3 and 4 on Lake Anna, by nature starts with the existing lake conditions and adds the effects of construction and operation to reach a cumulative impact on Lake Anna." This information does not address our concern.

The IHA was requested to assess the cumulative impact on the North Anna River not Lake Anna. The DWR does not agree that a cumulative evaluation of impacts to the North Anna River starts with the existing lake conditions and adds the effects of operation of the third unit. Dominion has only shown the incremental impact of the third unit. The applicant did not analyze the cumulative impact in a manner that addresses our concern.

Dominion provided DWR with the output of a simulation model with which we are able to make some comparisons of true pre- and post-project conditions. Prior to the lake, the North Anna River at the dam site had an average flow of about 286 cubic feet per second (cfs). This is based on the flow records from 1929 to 1971 at the Doswell gage proportionately reduced to reflect the smaller drainage area at the dam. According to the NRC water budget analysis, the two existing units account for 50 cfs in evaporation and the third unit would account for 26 cfs in evaporation. The cumulative impact on the average flow of just the power plants (not including lake evaporation) is therefore estimated to be 76 cfs or 26% of the historic average flow. Such a large loss of the normal flow to consumptive uses is unprecedented in Virginia and other mid-Atlantic states. The USGS estimates that the average percentage of surface water lost to consumptive use in the mid-Atlantic states is 1.6% of average flow. (USGS, 1984, National Water Summary)

We examined pre-dam gage records and compared those streamflow records with projected releases with three reactors operating in a once through cooling mode. This is not a true IHA analysis but it is presented in order to give some perspective of the magnitude of true pre and post project conditions.

- Prior to the project, flows at the dam site were less than or equal to 20 cfs only 4.2% of the time; with the third unit, flows are projected to be 20 cfs 11.8% of the time.

- Prior to the project, flows at the dam site were greater than or equal to 156 cfs 52% of the time (pre dam Doswell gage); with three units, flows will be less than or equal to 40 cfs 52% of the time (DEIS, page 5-12),

- Prior to the project, during the driest 14 month period on record (early May 1931 to early July 1931) streamflow in the North Anna River averaged 90 cfs over the 14 months. With the three units, the driest 14 month period (mid September 2001 through mid January 2003) streamflow in the North Anna River would average only 20 cfs.

DWR disagrees with the DEIS's conclusion that these pre and post project flow alterations and their impact can be described as small or moderate. We would characterize these types of alterations as large.

Alternatives Analysis

The DWR believes that the Surry site is superior to the North Anna site. We reach this conclusion based on the limited water resources in the North Anna River watershed, the amount of those resources that are already being consumed by lake evaporation and the forced evaporation from the existing two reactors, and the competition for those resources downstream. Water availability would not be an issue on the tidal James River at Surry. The DEIS says that, "The consumptive use of water to support mechanical draft cooling towers would be undetectable relative to the supply in the estuary".

At two meetings with DEQ staff, NRC officials were asked why North Anna rather than Surry was being proposed for an early site permit. On both occasions, NRC staff cited aesthetics and the fact that the plant might be visible from Jamestown. The DEIS on pages 8- 32 and 8-33 does not indicate that there is any problem with aesthetics at Surry. In fact the DEIS says, "its current structures are not visually obtrusive from any vantage point, even from across the James River. However Units 1 and 2 are visible from the highest amusement rides at Busch Gardens." DWR does not understand how aesthetics could play a major role in the minds of NRC staff especially when the DEIS states that these reactors are not visually obtrusive and only readily visible from the top of a roller coaster.

Impingement and entrainment issues would be a greater problem at the Surry site than at Lake Anna. This is due to the James River being an estuary at the Surry site. However, the alternatives section states that reactors at Surry would be cooled with cooling towers. As such, the impingement and entrainement problem would be less than if once through cooling were to be used. On April 4, 2001, Dr. John Olney of Virginia Institute of Marine Resources wrote to Mr. Tony Banks of Dominion Power on the subject of impingement and entrainment at Surry while commenting on the relicensing. In the letter Dr. Olney states, "Further, the available information on abundance and distribution of fishes at the site suggests that there is a low probability that water withdrawals at the plant are causing declines in federally managed species." The fact that Dr. Olney does

not express concerns about a large once through cooling water withdrawal makes it seem likely that a cooling tower withdrawal, orders of magnitude smaller, would also not be a concern.

In conclusion, two of the most important disadvantages of the Surry site, appear not to be problems at all while the main disadvantage of the North Anna site, water availability, appears extremely problematic. The DWR would have no concerns about this project if both the fourth and third reactors at North Anna were air cooled.

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DEQ-Office of Environmental Impact Review

COMMONWEALTH of VIRGINIA

W. Tayloe Murphy, Jr.
Secretary of Natural Resources

Department of Game and Inland Fisheries

William L. Woodfin, Jr.
Director

February 15, 2005

Mr. Charles H. Ellis, III
Department of Environmental Quality
Office of Environmental Impact Review
629 East Main St., Sixth Floor
Richmond, VA 23219

RE: JPA 04-216F
Early Site Permit at North Anna ESP Site
ESSLOG 19290

Dear Mr. Ellis,

We have reviewed "Draft EIS for an early site permit at the North Anna ESP site" (document NUREG-1811) and offer the following comments and recommendations. The Department of Game and Inland Fisheries (VDGIF), as the Commonwealth's wildlife and freshwater fish management agency, exercises enforcement and regulatory jurisdiction over those resources, inclusive of State or Federally *Endangered* or *Threatened* species, but excluding listed insects. We are a consulting agency under the U. S. Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), and we provide environmental analysis of projects or permit applications coordinated through the Virginia Department of Environmental Quality, the Virginia Marine Resources Commission, the Virginia Department of Transportation, the U. S. Army Corps of Engineers, the Federal Energy Regulatory Commission, and other state or federal agencies. Our role in these procedures is to determine likely impacts upon fish and wildlife resources and habitats, and to recommend appropriate measures to avoid, reduce, or compensate for those impacts.

We continue to have reservations about the proposed Unit 3 impacts on the lake and downstream resources. The document did not address the main concerns outlined in our letter of January 27, 2004. Our comments in this letter will address primarily the issues raised in Section 5.0 Station Operating Impacts at the Proposed Site.

Biological communities Section 2.7.2.1
The document's nomenclature surrounding native vs. nonnative species, appears to minimize the value of the striped bass fishery. Striped bass and other anadromous fish are native to the York River drainage and the North Anna River, while largemouth bass, bluegill, black crappie, walleye and channel catfish are not. Nevertheless, all of these species are important to the recreational fishery within the lake.

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Hydrological Alterations Section 5.3

Section 5.3 addresses the water related impacts. Earlier discussions with Dominion and DEQ resulted in the selection of Lake Anna water level elevation 248 as being representative of a hydrologic drought. Based upon historic data this would have a recurrence interval of once every 8.7 years and was agreed upon as being indicative of drought conditions. This matches closely other commonly used drought indicators (e.g., 7Q10) as an indicator of drought conditions in streams for water quality and discharge permit conditions. Table 1 on page F-102 can be used to evaluate the recurrence intervals of droughts. The USGS publication referenced in that table discusses drought recurrence intervals ranging from once every 15 to 80 years. Using elevation 248 as an indicator, past Dominion records demonstrate that this level has been observed 3 times in the last 26 years, a reasonable expectation of the recurrence interval (8.6 years) for a drought. Addition of Unit 3 would increase the drought recurrence interval to every 2.6 years and more than double the total weeks of 20 cfs or lower flows from 67 to 143. Median duration of drought flows of 20 cfs would be 7 weeks with the proposed Unit 3. VA State Water Control Board Bulletin #58 reviewed flow statistics for the gage downstream at Doswell. Prior to dam construction, flows of 25 cfs or lower would occur once every 10 years for about 10 weeks. Addition of Unit 3 would significantly increase the frequency of drought flows downstream and the duration of those droughts. The change to drought flows once every 2.6 years, for median duration of 7 weeks, is a significant change from conditions prior to the plant/reservoir construction, and demonstrates the need for cumulative analysis of impacts. The Index of Hydrologic analysis computed on pages F-126-133 is not complete, as requested, since it does not evaluate pre-dam conditions. Table 1 demonstrates significant shifts in frequency of lower flows and needs to be expanded to address conditions prior to creation of the lake. Cumulative impacts of the current and future Units on downstream hydrology and biology need to be quantitatively evaluated before any determination that impacts on downstream resources are "small". Two options exist to reduce the significant impacts on downstream hydrology: change the trigger level of elevation (248) to some lower elevation that has a recurrence interval of once every 8.7 years, or have Unit 3 operate as Unit 4 under dry cooling conditions.

Intake system Section 5.4.2.1

We applaud Dominion's use of "worst case" scenarios for estimating impingement and entrainment and acknowledge their estimate of a 131% increase in impingement rate for Unit 3. In developing the total estimate of entrainment and impingement data, derived from 1979 - 1983 was added to worst-case Unit 3 operation. What is unclear is if the 1978-83 values used for Units 1 & 2 reflect current operating conditions and are valid. Has the Unit 1 and 2 water volume pumped increased or decreased from the 1979-1983 period? We understand that plant-operating time, efficiency and volume of water pumped have increased since the study period. In that case, the table reflecting the impacts of Units 1 and 2 needs to be revised to reflect current operating conditions.

Several problems are apparent in the tables in this section. In reviewing the tables, Tables 5-4 thru 5-6 do not reflect "yearly totals". Rather, they reflect only seasonal losses (March-July).

This needs to be corrected to reflect annual losses for the remaining seven months. If summer, fall, and winter data were not collected, that data may have to be extrapolated by the best fitting of a nonlinear function to the available data. Only then can the full impacts start to be addressed. Tables 5- 2 and 5-5 may have significant errors, or the reasons for differences are not fully explained. For example, in Table 5-2 for Unit 3, January striped bass and bluegill numbers impinged are greater than in Units 1 & 2 (Table 5-1), but black crappie, gizzard shad, white perch and yellow perch numbers are less than in Units 1 & 2. Similar discrepancies exist for other rows and for the cumulative Tables 5-3 and 6. These discrepancies should be further explained.

We disagree with the assessment of "small" impact due to the most prevalent species impinged (gizzard shad) based upon the magnitude of such an increase (131%). Gizzard shad are indeed a "prolific forage fish", but their abundance has been low in VDGIF samples in two recent years. This species is the primary forage for stocked pelagic predators (striped bass and walleye) and also supplements largemouth bass diet. Further declines in striped bass habitat (another contested issue) combined with potential reductions in the forage base could significantly impact this recreationally and economically important fishery. Section 5.4.2.2 estimates the impingement loss to the fish population as a percentage of the estimated total lake population as derived from cove rotenone. We applied this same technique to entrainment numbers and calculate that 6.8% of the gizzard shad and 87% of the black crappie are lost due to entrainment. When combined with impingement 7.7% of the gizzard shad and 93.9% of the black crappie numbers are killed by the intake structure. We do not consider losing almost 8 and 94% of these populations from an intake a small impact. Several problems exist with this approach and these need to be addressed. Lakes undergo eutrophication with age and that is occurring at Lake Anna as the watershed becomes more fully developed. As that occurs, the biomass of fish increases. The current biomass is undoubtedly higher than twenty years ago when the original entrainment/impingement analysis was conducted. The report uses cove rotenone data but does not account for spatial and temporal variation within that data. Within large reservoirs, biomass typically declines downstream through a trophic gradient. That is apparent from our routine sampling as well as historic rotenone data. The impacts of entrainment and impingement may be even more spatially and numerically significant in the lower lake where the numbers of fish are less than above the Rt. 208 bridge.

Dominion acknowledges that 300 million fish could be entrained annually. The statement on page 5-25 that "fish entrained most frequently are prolific high reproductive potential and compensatory responses of the fish population occur to offset losses, the staff concludes that the impacts of entrainment would be small" is subjective and not based on scientifically sound evidence.

It is apparent that the entrainment tables need to be corrected to reflect an actual annual loss. Entrainment/impingement table discrepancies need to be corrected or explained and a much more rigorous spatial and temporal evaluation needs to be conducted before it can be concluded that the impacts of entrainment and impingement are small. We continue to recommend the use of state of the art screens as encouraged by EPA in their recent screen recommendations. Based upon a thorough literature review in VA., we currently recommend 1 mm opening and 0.25 fps

intake velocity to protect aquatic life. This would greatly alleviate the entrainment/impingement issue as would use of a dry cooling tower.

Striped Bass Reservoir Habitat

We agree with the descriptive statements on page 5-30 lines 24-33. However, line 37 incorrectly states that striped bass are not native to this watershed. The use of nomenclature surrounding native vs. nonnative species appears to minimize the value of the striped bass fishery. This is incorrect. Striped bass are, in fact, native to the York River drainage and downstream reaches of the North Anna can be seasonally important for spawning and juvenile rearing. The lake population is correctly acknowledged as being supported by stocking. In recognition of this fact, we strive to stock Chesapeake strain striped bass in the reservoir so as not to change the genetics of downstream populations.

An extensive amount of temperature data from historic monitoring of the lake was used to model thermal conditions at various locations in the lake. Despite that extensive data set, no modeling of summer striped bass habitat was conducted to support statements that the impacts would be small in normal years and moderate in drought years (page 5-31 lines 18-19). In combination with the elevated temperatures and increased frequency of drought conditions (lowering to elevation 248) within the lake, the striped bass population could be stressed every 2.6 years. One cannot state with confidence that installation of a third unit *would* cause acute mortality from exacerbated summer habitat squeeze; but concurrently, one cannot state with confidence that such mortality *would not* occur. At some point, striped bass will begin to die as water quality declines (based primarily on higher water temperatures and lower dissolved oxygen). Since no modeling of summer habitat was conducted, it is unknown if the additive impacts of a third unit would allow reservoir conditions to reach this point, and the exact point at which this will occur is unknown; but to discount the possibility is subjective. Even with the elimination of Unit 4, the predicted maximum surface temperature increase at the dam of 3.6 degrees Fahrenheit could result in striped bass mortalities depending on the plume configuration, inflow, and stratification pattern. Striped bass habitat modeling is necessary and essential in the final document to explain the potential of a new (third) unit and its impact on striped bass habitat.

The comment regarding droughts, " In such circumstances, mitigation to reduce the impact could be accomplished by stocking more fish, stocking larger fish, or managing the fishery to provide more catch opportunities of large fish", is incorrect and not a scientifically recognized fishery management solution. Such a comment does not recognize the biological and physical factors necessary for a successful striped bass population.

North Anna River Fishery Issues

The downstream impacts to fisheries resources were ignored in the draft document despite the increased frequency of low flows. Currently, (with two units in the regulated "base scenario"), 67 weeks of drought conditions (20 CFS or less) out of a 26-year period would be expected. Given the addition of a third unit, the expected drought frequency would rise to 150 weeks

(about 2.6 years). The Tennant method is a common desktop method and summer flows in the 20-30% mean annual flow range are beneficial for sustainable fisheries. Because it has been called the Montana Method, it has been deemed as only applicable in Western streams. That misconception is false as it was developed "over the past 17 years from work on hundreds of streams in the states north of the Mason-Dixon Line between the Atlantic Ocean and the Rocky Mountains" (Fisheries 1(4): 6-10). Summer flows below the desired level of 68 cfs (20% of MAF) are the norm under current conditions and will worsen under future conditions. We recommended that an Instream Flow Incremental Methodology Study be conducted to properly evaluate this project on the stream fauna. The expected increased frequency of drought flows to a common occurrence (2.6 years) is expected to have significant impacts. Conclusions need to be based upon sound scientific modeling. If Dominion can offer a better approach to modeling flow impacts, we would be happy to consider any alternative. However, in response to the statement, "long-term monitoring of the North Anna River has documented improvements in the abundance and diversity of aquatic biota since impoundment", VDGIF is unaware of any intensive data analysis to support such an assertion. Our analysis of the Dominion data set documented changes that are reflective of drought conditions. Placing the population under frequent drought stress will shift the community substantially. This analysis was provided to Dominion on June 18, 2005. Recent VDGIF surveys of the North Anna River have suggested that the primary sportfish, smallmouth bass, has much lower abundances than in other rivers in the region. Other fish populations were present in relatively low levels. It is the opinion of VDGIF biologists that the low abundance and biomass of predator and forage species in the North Anna River is related to higher than naturally occurring incidences of drought conditions. There also is the possibility that drought flow conditions could adversely impact downstream anadromous nursery areas. This potential impact should be evaluated. Increasing the drought frequency to the proposed extent would have a negative impact on this fishery. Such impacts are not acceptable.

The balance of a major argument within the document centers on subjective speculation on whether the installation of Units 3 and/or 4 would present complications for fish populations. VDGIF thinks there would be complications, but Dominion and NRC disagree. More likely at issue is not if complications would occur, for they almost certainly would; but the extent of such complications and the population-level impacts. Without extensive modeling, it is impossible to argue either point successfully. We recommend the application of sound scientific modeling to the decision process and that these appropriate corrections based on model outcomes be incorporated in the final document.

Thank you for the opportunity to comment on this proposed management plan. Please call Andrew Zadnik or me at (804) 367-6913 if we may be of further assistance.

Sincerely,

Raymond T. Fernald, Manager
Nongame and Environmental Programs

If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

REVIEW INSTRUCTIONS:

A. Please review the document carefully. If the proposal has been reviewed earlier (i.e. if the document is a federal Final EIS or a state supplement), please consider whether your earlier comments have been adequately addressed.

B. Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.

C. Use your agency stationery or the space below for your comments. **IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.**

Please return your comments to:

MR.CHARLES H. ELLIS III
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319

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Charles H. Ellis III
CHARLES H. ELLIS III
ENVIRONMENTAL PROGRAM PLANNER

COMMENTS

We do not anticipate this project will affect VDACS' responsibilities for the preservation of agricultural lands and the protection of listed endangered and threatened plant and insect species.

(signed) (Keith R. Tignor) (date) January 20, 2005

(title) Endangered Species Coordinator

(agency) VDACS, Office of Plant and Pest Services

PROJECT # 04-216F 8/98

W. Tayloe Murphy, Jr.
Secretary of Natural
Resources

Joseph H. Maroon
Director

COMMONWEALTH of VIRGINIA

DEPARTMENT OF CONSERVATION AND RECREATION

203 Governor Street
Richmond, Virginia 23219-2010
(804) 786-6124

5 February 2005

Mr. Charles H. Ellis, III
Environmental Review Coordinator
Virginia Department of Environmental Quality
629 East Main Street, 6th Floor
Richmond, Virginia 23219

Re: DEQ#04-216F: North Anna Early Site Permit Application, *Revised*

Dear Mr. Ellis:

The Department of Conservation and Recreation (DCR) functions to preserve and protect the environment of the Commonwealth of Virginia and advocate the wise use of its scenic, cultural, recreation and natural heritage resources. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, state unique or exemplary natural communities, significant geologic formations and similar features of scientific interest.

DCR has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined by the submitted map. Biotics documents the presence of natural heritage resources in the project area. However, due to the scope of the activity and the distance to the resources, we do not anticipate that this project will adversely impact these natural heritage resources.

Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the Virginia Department of Conservation and Recreation (DCR), DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. The current activity will not affect any documented state-listed plants or insects.

Any absence of data may indicate that the project area has not been surveyed, rather than confirm that the area lacks additional natural heritage resources. New and updated information is continually added to Biotics, please contact DCR for an update on this natural heritage information if a significant amount of time passes before it is utilized.

In addition, the Virginia Department of Game and Inland Fisheries maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters, that may contain information not documented in this letter. Their database may be accessed from http://www.dgif.virginia.gov/wildlife/info_map/index.html , or contact Shirl Dressler at (804) 367-6913.

Be advised that if a project on privately- or locality-owned lands involves a land-disturbing activity of 2,500 square feet or more, the property owner is responsible for submitting a site-specific erosion and sediment control (ESC) plan to Spotsylvania County for review and approval pursuant to the local ESC ordinance. The ESC plan must be approved prior to initiation of any land disturbance on the project site. All regulated land-disturbing activities associated with the project, including on or off site access roads, staging areas, of spoil or borrow areas, must be covered by an approved plan. Dependent on local requirements, a separate stormwater management (SWM) plan may also be required. Local ESC program requirements should be requested through Spotsylvania County. Stormwater Management program requirements should be requested from DCR's Division of Soil and Water Conservation, Mr. C. Lee Hill (804.786.3998, email: Lee.Hill@DCR.Virginia.gov). For general information on the recent changes to stormwater management requirements, you may wish to visit our website at http://www.dcr.virginia.gov/sw/vsmp.htm#geninfo. *[Reference: Virginia Erosion and Sediment Control Law §10.1-563; Virginia Erosion and Sediment Control Regulations §4VAC50-30-30; Virginia Stormwater Management Law §10.1-603.3; Virginia Stormwater Management Regulations §4VAC-3-20-90 - 141]*

Finally, please note the North Anna River is a spectacularly scenic and remote canoeing river with excellent fishing. Permits for the new generators must protect downstream uses of the river, especially during the prime recreation season. Discharge rates from the Lake Anna Dam should be adequate to meet minimum instream flow for recreational boating from Route 601 to Route 301. A MIF Recreation study should be conducted to determine what this discharge level should be.

Thank you for the opportunity to offer comments on this project.

Sincerely,

Robert S. Munson
Planning Bureau Manager

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219
Mailing address: P.O. Box 10009, Richmond, Virginia 23240
Fax (804) 698-4500 TDD (804) 698-4021
www.deq.state.va.us

W. Tayloe Murphy, Jr.
Secretary of Natural Resources

Robert G. Burnley
Director

(804) 698-4000
1-800-592-5482

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MEMORANDUM

TO: Charles H. Ellis, Environmental Program Planner

FROM: DARB Allen Brockman, Waste Division Environmental Review Coordinator

DATE: December 21, 2004

COPIES: Sanjay Thirunagari, Waste Division Environmental Review Manager; Devlin Harris; file

SUBJECT: Draft Environmental Impact Assessment— NRC's Early Site Permit at the North Anna ESP Site; DEQ Project Code # 04-216F

The Waste Division has completed its review of the Draft Environmental Impact Statement for NRC's Early Site Permit at the North Anna ESP Site near Bumpass, Virginia. We have the following comments concerning the waste issues associated with this project:

The report somewhat addressed solid waste issues and sites. However, the report did not address hazardous waste issues and sites. Also, the report did not include a search of waste-related databases. The Waste Division staff performed a cursory review of its data files and determined that the facility is listed as "VEPCO – NORTH ANNA" (ID number VAD000620237) in the CERCLA database and it is listed that no further remedial action is planned (NFRAP) on the CERCLA site. Also, the site is designated as "VIRGINIA POWER NORTH ANNA," a small quantity generator of hazardous waste, in EPA's RCRA database, ID number VAD065376279). The following websites may prove helpful in locating additional information for these identification numbers: http://www.epa.gov/echo/search_by_permit.html or http://www.epa.gov/enviro/html/rcris/rcris_query_java.html . Devlin Harris of the DEQ's CERCLA unit was contacted for his review of this determination, and he will reply in a separate memo (if he identifies any additional issues).

The draft assessment noted that it presents a construction plan and that actual construction will not occur prior to our review of a further submittal (see assessment abstract). However, the information presented in this memo should be considered as part of this initial statement. Also, the draft assessment noted the potential risk of radioactive waste occurring on site after construction (see, e.g., p. 4-39, 4-40, 6-22, and 8-12). Any soil that is suspected of contamination or wastes (radioactive or otherwise) that are generated during construction-related activities must be tested and disposed of in accordance with applicable Federal, State, and local laws and regulations. Some of the applicable state laws and regulations are: Virginia Waste

Management Act, Code of Virginia Section 10.1-1400 *et seq.*; Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC 20-60); Virginia Solid Waste Management Regulations (VSWMR) (9VAC 20-80); Virginia Regulations for the Transportation of Hazardous Materials (9VAC 20-110). Some of the applicable Federal laws and regulations are: the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6901 *et seq.*, and the applicable regulations contained in Title 40 of the Code of Federal Regulations; and the U.S. Department of Transportation Rules for Transportation of Hazardous materials, 49 CFR Part 107.

Also, any structures that may be demolished/removed/renovated (see, e.g., Site Redress Plan on p. 4-46) should be checked for asbestos-containing materials (ACM) and lead-based paint prior to performing these activities. If ACM or LBP are found, in addition to the federal waste-related regulations mentioned above, State regulations 9VAC 20-80-640 for ACM and 9VAC 20-60-261 for LBP must be followed.

Please note that DEQ encourages all construction projects and facilities to implement pollution prevention principles, including the reduction, reuse, and recycling of all solid wastes generated. All generation of hazardous wastes should be minimized and handled appropriately.

If you have any questions or need further information, please contact Allen Brockman at (804) 698-4468.

DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF AIR PROGRAM COORDINATION

ENVIRONMENTAL REVIEW COMMENTS APPLICABLE TO AIR QUALITY

TO: Charles H. Ellis III DEQ - OEIA PROJECT NUMBER: 04 – 216F

PROJECT TYPE: ☐ STATE EA / EIR / FONSI X FEDERAL EA / EIS ☐ SCC

☐ CONSISTENCY DETERMINATION/CERTIFICATION

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PROJECT TITLE: EARLY SITE PERMIT AT THE NORTH ANNA ESP SITE

PROJECT SPONSOR: NUCLEAR REGULATORY COMMISSION

PROJECT LOCATION: X OZONE NON ATTAINMENT AREA (PARTLY)

REGULATORY REQUIREMENTSMAY BE APPLICABLE TO: ☐ CONSTRUCTION ☐ OPERATION

STATE AIR POLLUTION CONTROL BOARD REGULATIONS THAT MAY APPLY:

1. ☐ 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 E – STAGE I
2. ☐ 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 F – STAGE II Vapor Recovery
3. ☐ 9 VAC 5-40-5490 et seq. – Asphalt Paving operations
4. X **9 VAC 5-40-5600 et seq. – Open Burning**
5. X **9 VAC 5-50-60 et seq. Fugitive Dust Emissions**
6. ☐ 9 VAC 5-50-130 et seq. - Odorous Emissions; Applicable to_____
7. ☐ 9 VAC 5-50-160 et seq. – Standards of Performance for Toxic Pollutants
8. ☐ 9 VAC 5-50-400 Subpart_____, Standards of Performance for New Stationary Sources, designates standards of performance for the_____
9. ☐ 9 VAC 5-80-10 et seq. of the regulations – Permits for Stationary Sources
10. ☐ 9 VAC 5-80-1700 et seq. Of the regulations – Major or Modified Sources located in PSD areas. This rule may be applicable to the _____
11. ☐ 9 VAC 5-80-2000 et seq. of the regulations – New and modified sources located in non-attainment areas
12. ☐ 9 VAC 5-80-800 et seq. Of the regulations – Operating Permits and exemptions. This rule may be applicable to _____

COMMENTS SPECIFIC TO THE PROJECT:

One of the counties (Spotsylvania) is designated for ozone non-attainment. Precautions are therefore necessary to restrict the emissions of volatile organic compounds (VOC) and oxides of nitrogen (NOx).

K.S. Narasimhan

(Kotur S. Narasimhan)
Office of Air Data Analysis

DATE: December 20, 2004

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FEB 02 2005

DEQ-Office of Environmental Impact Review

MEMORANDUM

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF WATER QUALITY
Ellen Gilinsky, Ph.D., Director

TO: Charles H. Ellis, III
Office of Environmental Impact Review

FROM: Michelle Henicheck (MH)
Office of Wetlands & Water Protection

DATE: 31 January, 2005

SUBJECT: Environmental Impact Statement (EIS), Draft
Early Site Permit at the North Anna ESP Site
04-216F

We have reviewed the information provided concerning the above-referenced project. According to information provided in the report, the early site permit (ESP) is a Nuclear Regulatory Commission (NRC) approval of a site or sites for one or more nuclear power facilities. The ESP application and review process makes it possible to evaluate and resolve safety and environmental issues related to siting before the applicant makes large commitment of resources. It does not authorize construction or operation of a nuclear power plant.

According to the report (page 4-7), "a few small wetland areas and two intermittent streams exist on the North Anna ESP site." However at this time, a wetland delineation of this area has not yet been done. Without additional information on the precise location and extent of the wetland and stream areas, we cannot infer whether or not the proposed project will adversely affect areas within our enforceable program. DEQ recommends submittal of a National Wetland Inventory (NWI) map identifying the project area, photographs of the intermittent stream, an Army Corps of Engineers (ACOE) confirmation of the wetlands delineation and any other information pertaining to the location of wetlands or streams near the project area.

If State waters, including wetlands, are to be impacted by the project activities, a Virginia Water Protection (VWP) permit may be required, and the project proponent should coordinate with the DEQ Northern Virginia Regional Office for a final permit determination. The report states, in several different sections, that avoidance and minimization of wetland impacts will occur to the maximum extent practicable. This determination is more appropriately conducted during permit application review. Further, the amount, type, and location of compensatory wetland mitigation is also conducted during permit application review and is based upon the ecologically preferable alternative.

The withdrawal of cooling water for a once through cooled reactor number would require a Virginia Water Protection Permit from the Department of Environmental Quality. The

Division of Water Resources will be commenting under a separate memorandum on the water quantity issues.

Please note that because the dwarf wedgemussel (*Alasmidonta heterodon*) is listed as surviving in the South Anna River in Louisa County, a complete review of Threatened and Endangered Species will be done as part of the review process and should be coordinated with the Department of Game and Inland Fisheries.

We recommend strict adherence to erosion and stormwater management practices and further encourage the project proponent to monitor construction activities to make certain that erosion and stormwater management practices are adequately preventing sediment and pollutant migration into adjacent surface waters. A VPDES stormwater general permit for construction activities will be required should the project disturb one or more acres of land.

Ellis,Charles

From: Bowden,John
Sent: Wednesday, February 02, 2005 8:07 AM
To: Ellis,Charles
Subject: EIS #04-216F

NVRO comments regarding the Early Site Permit at the North Anna ESP Site project sponsored by the Nuclear Regulatory Commission are as follows:

1. Air Permitting-All the environmental issues regarding this project are water related issues. Additionally the EIR ERR Form date 12/10/04 refers to and ESP to license to undertake a study process to determine whether the site in question is suitable for construction of an atomic reactor and not the actual construction the facility.

2. Waste Compliance-The *Draft Environmental Impact Statement for an Early Site Permit at the North Anna ESP Site* by the Nuclear Regulatory Commission has been reviewed for compliance with the Virginia State Waste Regulations. They indicate in Section 3.2.4 *Nonradioactive Waste Systems* that solid wastes generated from the site would be handled in compliance with state and federal regulations. Since the state does not have authority over radioactive wastes, this statement is sufficient to handle the nonradioactive waste they may generate.

3. Wetlands-Dominion Nuclear North Anna L.L.C. is considering the addition of two new nuclear reactors at the Dominion Virginia Power Company's North Anna facilities in Louisa County, Virginia. The Draft Environmental Impact Statement indicates that the proposed activities will impact state waters. A Virginia Water Protection (VWP) permit from the Virginia Department of Environmental Quality is required for the following activities, as stated in 9 VAC 25-210-50.A of the VWP permit program regulations:

> Except in compliance with a VWP permit, no person shall dredge, fill or discharge any pollutant into, or adjacent to surface waters, or otherwise alter the physical, chemical or biological properties of surface waters, excavate in wetlands, or on or after October 1, 2001, conduct the following activities in a wetland:

1. New activities to cause draining that significantly alters or degrades existing wetland acreage or functions;
2. Filling or dumping;
3. Permanent flooding or impounding; or
4. New activities that cause significant alteration or degradation of existing wetland acreage or functions

If the proposed project includes one or more activities mentioned above, the applicant must apply for a VWP permit.

4. Water Permitting-Tom Faha, NVRO Water Permitting Manager, attended a meeting at Central Office on January 19, 2005, with Ellie Irons, Joe Hassell, and Richard Rassumussen. He presented his comments directly to the responsible parties at that time.

John D. Bowden
Deputy Regional Director
Department of Environmental Quality
Northern Virginia Regional Office
(703) 583-3880
jdbowden@deq.virginia.gov

If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

REVIEW INSTRUCTIONS:

A. Please review the document carefully. If the proposal has been reviewed earlier (i.e. if the document is a federal Final EIS or a state supplement), please consider whether your earlier comments have been adequately addressed.

B. Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.

C. Use your agency stationery or the space below for your comments. IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.

Please return your comments to:

MR.CHARLES H. ELLIS III
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319

CHARLES H. ELLIS III
ENVIRONMENTAL PROGRAM PLANNER

COMMENTS

Please be advised that the Marine Resources Commission, pursuant to Section 28.2-1200 et seq of the Code of Virginia, has jurisdiction over any encroachments in, on, or over the beds of the bays, ocean, rivers, streams, or creeks which are the property of the Commonwealth. Accordingly, if any portion of the subject project involves any encroachments channelward of ordinary high water along natural rivers and streams above the fall line or mean low water below the fall line in tidal waterways, a permit may be required from our agency. Additionally, permits may be required from the Commission or the local wetlands board should the proposed project encroach onto a coastal primary sand dune and beach. Any jurisdictional impacts will be reviewed by VMRC during the Joint Permit Application process. Thank you for the opportunity to comment.

(signed) _____ (date) _____

(title) Environmental Engineer

(agency) VA Marine Resources Commission

PROJECT # 04-216F

8/98

If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

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RICHMOND, VA 23219
FAX #804/698-4319

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Charles H. Ellis III
CHARLES H. ELLIS III
ENVIRONMENTAL PROGRAM PLANNER

COMMENTS

The NRC is currently consulting with DHR directly pursuant to Section 106 of the National Historic Preservation Act. We anticipate this consultation to continue.

(signed) [signature] (date) 12 Jan 05

(title) Architectural Historian

(agency) DHR

PROJECT # 04-216F 8/98

DHR project # 2000-1210

If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

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DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319

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JAN 26 2005

DEQ-Office of Environmental Impact Review

~~CHARLES H. ELLIS III~~
ENVIRONMENTAL PROGRAM PLANNER

COMMENTS

As an early site permit allows a suitability study, DMME has no comment. If, in the future, this study is conducted, DMME requests review those areas of concern to DMME, ie. geology and mineral resources of the site.

(signed) _____ (date) 24 January 2005

(title) GEOLOGIST

(agency) DMME

PROJECT # 04-216F 8/98

If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

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DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319

RECEIVED
DEC 22 2004
DEQ-Office of Environmental Impact Review

Charles H. Ellis III
CHARLES H. ELLIS III
ENVIRONMENTAL PROGRAM PLANNER

COMMENTS

No significant impact on the forests of the Commonwealth.

(signed) J. Michael Fiorca (date) 12-20-04

(title) Forest Mgt.

(agency) DOF

PROJECT # 04-216F 8/98

FSPR-NRC-01-03
North Anna-early site permits

If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

REVIEW INSTRUCTIONS:

A. Please review the document carefully. If the proposal has been reviewed earlier (i.e. if the document is a federal Final EIS or a state supplement), please consider whether your earlier comments have been adequately addressed.

B. Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.

C. Use your agency stationery or the space below for your comments. **IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.**

Please return your comments to:

MR.CHARLES H. ELLIS III
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319

RECEIVED

FEB 0 4 2005

DEQ-Office of Environmental Impact Review

Charles H. Ellis III

~~CHARLES H.~~ ELLIS III
ENVIRONMENTAL PROGRAM PLANNER

COMMENTS

This is not within a Chesapeake Bay Preservation Act jurisdiction, therefore, we have no comment.

(signed) Alice R.T. Baird (date) 1-26-05

(title) Chesapeake Bay Special Projects Coordinator

(agency) DCR-DCBLA

PROJECT # 04-216F 8/98

RJB Research 3/9/05

From: Ingrid Turner <turneriw@westinghouse.com>
To: <nrcrep@nrc.gov>
Date: Tue, Feb 22, 2005 11:43 AM
Subject: Response from "Comment on NRC Documents"

10/10/04 69FR71857

(440)

Below is the result of your feedback form. It was submitted by

Ingrid Turner (turneriw@westinghouse.com) on Tuesday, February 22, 2005 at 11:42:45

Document_Title: Draft Environmental Impact Statement for an Early Site Permit (ESP) at the North Anna ESP Site (NUREG-1811) Draft Report for Comment.

Comments: I see no problem with an early site permit for North Anna Site.
I have always belived in using Nuclear Fuel for supporting
the electrical needs of the United States. It's safe, environmentally clean, efficient and low maintance. I would like to see more Nuclear Fuel Plants so that coal, natural gas and etc. could be used in other areas.

organization: Sr. Sourcing Materials Specialist, Strategic Sourcing

address1: Drawer R

address2:

city: Columbia

state: SC

zip: 29250

country: USA

phone: 803-647-3226

ESP Review Complete
Template=ADM-013

E-RIDS=ADM-03
Add=J. Cushing (JXC9)
A. Williamson (AEW1)

601

RDB received 3/9/05

12/10/04 69FR 71850

441

From: Richard L. Geddes <Rgeddes1@aol.com>
To: <nrcrep@nrc.gov>
Date: Wed, Feb 23, 2005 6:14 PM
Subject: Response from "Comment on NRC Documents"

Below is the result of your feedback form. It was submitted by

Richard L. Geddes (Rgeddes1@aol.com) on Wednesday, February 23, 2005 at 18:13:57

Document_Title: Draft Environmental Impact Statement for an Early Site Permit (ESP) at the North Anna ESP Site (NUREG-1811) Draft Report for Comment

Comments: I hard copy mailed this comment Feb 7, but since it has not yet posted in ADAMS I can only assume it has not been received. Please accept it in electronic form:

February 7, 2005

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

Comments on NUREG-1811 (draft)
Environmental Impact Statement for an Early Site Permit (ESP) at the North Anna ESP Site

As a supporter of the rebirth of nuclear power in the U.S.'s power supply mix, I applaud Dominion's pursuit of an ESP and the Staff's timely and thorough review resulting in the issuance of NUREG-1811 (draft). I agree with the Staff's conclusions that the North Anna site appears to be environmentally acceptable for the construction of new reactors, and that Dominion's request to perform limited site preparation and investigation measures will not result in significant environmental insult.

However, I am surprised that one of the conclusions of the Staff is that "there are no environmentally preferable or obviously superior sites". My review of the data presented in NUREG-1811 reaches a different conclusion. It appears to me that the Staff is overlooking a number of factors which are indeed different among the various sites and, if considered, are discriminators which would identify the Savannah River Site as an obviously environmentally preferable site.

In Section 8.4 (page 8-9) The EIS includes the following statement:

"In evaluating the alternative sites, NRC staff found that certain impact areas would not vary among sites, and as a result, would not affect the evaluation of whether an alternative site is environmentally preferable to the proposed site. These impact areas include air quality as it relates to emissions from the sites during construction and operation, nonradiological health impacts, and radiological health impacts to members of the public and during operation and to biota. In addition, the impacts to public service facilities (schools, water, and wastewater treatment, etc.) would not materially impact whether an alternative site is selected or not. As a result, air quality, health impacts, and radiation exposures are not evaluated as part of the site-specific alternatives analysis, but rather are discussed generically in the following sections."

E-RIDS=ADM-03
J. Cushing (JXC9)
A. Williamson (AKW1)

ESP/Review Complete Template=ADM-013

602

These factors (air quality, health impacts and radiation exposures) are not inherently the same at each site under consideration. While emissions may be assumed equal at all sites, the impact of air pollution and radioactive emissions is dependent on the exposure of the population to these emissions. This exposure is governed primarily by two factors: population density in the area surrounding the plantsite, and distance to the plant boundary. The four sites are obviously different in nearby population density and distance of the proposed reactor to the site boundary. I would suspect that the Savannah River Site has both the longest distance to the boundary and the lowest nearby population of the sites under consideration; therefore would have the lowest impact. The EIS should be modified to evaluate the impact of these emissions at each site and consider both the nearby population and distance, as well as local meteorological effects.

Impacts to nearby public service facilities also need to be considered and are likely to be a differentiator among the facilities under consideration. The EIS notes that construction and operation of a new reactor at the proposed site will result in

- Traffic congestion (page 4-19 & 4-23)
- Reduced housing availability/increasing rents (4-29)
- Public water and sewer "concerns" (4-30)
- Needed expansion of police and fire capability (4-32)
- Increased demand for social services (4-32)
- Significant impact on already overcrowded schools (4-33)
- Concern with water and sewer infrastructure in Louisa and Orange counties (5-45)
- Additional burden on already overcrowded Louisa county schools (5-47)

The impact of the proposed action needs to be evaluated for its impact at each of the proposed sites to determine the differences that exist. I might point out that the employee population at the Savannah River Site has decreased by almost 15,000 people since the early 1990's and the existing public infrastructure may be much more capable of absorbing Dominion's construction and operational workforce with minimal impact.

I am surprised that the numerous examples of other environmental impacts of the proposed action at the North Anna site were not more closely compared with potentially lesser impacts at alternative sites. For instance:

- Conversion of land to housing developments (page 4-2)
- Alteration of two ephemeral streams and possibly one or more wetlands (4-5)
- Dredging resulting in suspension of sediment (4-5)
- Depression of the water table (4-6)
- Degraded water quality (4-12)
- Fishery habitat changed (4-12)
- Resuspension of heavy metals from Contrary Creek (4-12)
- Increased turbidity and reduced light penetration in Lake Anna (4-13)
- Overcrowding of Lake Anna and lessened recreational experience (4-28)
- Doubling the time Lake Anna levels will be low, impacting recreational use (5-8)
- Economic consequences to the three counties surrounding the lake. The more immediate impacts would be to the marinas and commercial businesses that earn revenue . . . (5-44)

Each of these should be considered and compared to a similar assessment for the alternative sites before the Staff draws a conclusion that there are no environmentally preferable or obviously superior sites.

The EIS states that population dose within 80km (50 mi) of those alternative sites that are closer to major population centers (e.g. Savannah River) could be higher than for the proposed North Anna EDP site; (page 8-12). I would like to see the data supporting this statement, as I do not believe the population within 50 miles of SRS exceeds that of the North Anna site. The 50 mile population of the North Anna region is reported as 1,538,156 in 2000 and expected to grow to 2,160,921 in 2020 (page 4-20). NUREG 1767, EIS on the Construction and Operation of a Proposed Mixed Oxide Fuel Fabrication Facility the

Savannah River Site issued in January 2005 lists the population of the SRS Region of Influence as 475,095 in 2000 and 489,000 in 2002 (projected). The Region of Influence may not be exactly the same as 50 miles but it is similar. Please review this information in the draft. Note that if corrections of nearby population density are needed, then impacts of both ro!
utine and accident releases will need to be recalculated. It general, it would be helpful to provide all data for the North Anna and alternative sites in common tables so that the public can see the basis information the Staff is using to reach its conclusions.

In contrast to the many environmental and societal impacts (albeit small or moderate, and potentially mitigable) NUREG-1811 describes for constructing a reactor at North Anna, the only identified environmental impact of locating the proposed reactor at SRS is the potential for land clearing if a new transmission line right of way is required. Since SRS is already tied to the regional grid with four primary feeders in differing directions, it is highly unlikely a new right of way will be needed. Except in the area immediately adjacent to the new reactor to reach an existing line, extensive clearing should not be necessary. Even if some clearing is needed, SRS is expected to be a government reservation in perpetuity, and on-site clearing would have no public impact.

Thank you for consideration of my comments. I am looking forward to them being addressed in the final issue of NUREG-1811.

Richard L. Geddes
807 Big Pine Road
North Augusta, SC 29841

Cc: Senator Lindsey Graham
United States Senate
Washington, DC 20510

Senator Jim DeMint
United States Senate
Washington, DC 20510

Congressman Gresham Barrett
House of Representatives
Washington, DC 20515

Congressman Joe Wilson
House of Representatives
Washington, DC 20515

Congressman James Clyburn
House of Representatives
Washington, DC 20515

Dr. Susan Wood, Chair
Citizens for Nuclear Technology Awareness
1204 Whiskey Road
Aiken, SC 29803

Mr. Mal McKibben, Executive Director
Citizens for Nuclear Technology Awareness
1204 Whiskey Road
Aiken, SC 29803

organization:

address1: 807 Big Pine Road

address2:

city: North Augusta

state: SC

zip: 29841

country: USA

phone: 803 278 3842

RDB Received 3/9/05

12/10/04

69FR 71854

442

From: Leo Fanning <leofanning@hotmail.com>
To: <nrcrep@nrc.gov>
Date: Fri, Feb 25, 2005 4:38 PM
Subject: Response from "Comment on NRC Documents"

Below is the result of your feedback form. It was submitted by

Leo Fanning (leofanning@hotmail.com) on Friday, February 25, 2005 at 16:38:29

Document_Title: Draft Environmental Impact Statement for an Early Site Permit (ESP) at the North Anna ESP Site (NUREG-1811) Draft Report for Comment

Comments: Please approve the document.

Nuclear power is a very positive power source for the future offering clean power generation with little or no greenhouse gas emission.

I want nuclear power to help America lead the world in CO2 reduction initiatives to leave the world a better place for my children.

organization:

address1: 532 Meadow Brook Drive

address2:

city: Columbia

state: SC

zip: 29223

country: USA

phone: 803-699-0704

ESP Review Complete Template=ADM-013

E-RIDS=ADM-03
Add = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB received 3/9/05

12/10/04

69 FR 71857

(HH3)

From: Richard L. Geddes <Rgeddes1@aol.com>
To: <nrcrep@nrc.gov>
Date: Sat, Feb 26, 2005 8:23 AM
Subject: Response from "Comment on NRC Documents"

Below is the result of your feedback form. It was submitted by

Richard L. Geddes (Rgeddes1@aol.com) on Saturday, February 26, 2005 at 08:23:03

Document_Title: Draft Environmental Impact Statement for an Early Site Permit (ESP) at the North Anna ESP Site (NUREG-1811) Draft Report for Comment

Comments: Is there some reason you don't post my comment on this document in ADAMS??? I have submitted both as hard copy (USPS) and on comment form. I believe my comment might spur other similar comments and would like to see it posted!!!!

What is the delay?????

Once again:

February 7, 2005

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

Comments on NUREG-1811 (draft)
Environmental Impact Statement for an Early Site Permit (ESP) at the North Anna ESP Site

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However, I am surprised that one of the conclusions of the Staff is that "there are no environmentally preferable or obviously superior sites". My review of the data presented in NUREG-1811 reaches a different conclusion. It appears to me that the Staff is overlooking a number of factors which are indeed different among the various sites and, if considered, are discriminators which would identify the Savannah River Site as an obviously environmentally preferable site.

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SISP Review Complete Template = ADM-013

E-RIDS = ADM-03
Add = J. Cushing (JXC9)
A. Williamson (AEW1)

water, and wastewater treatment, etc.) would not materially impact whether an alternative site is selected or not. As a result, air quality, health impacts, and radiation exposures are not evaluated as part of the site-specific alternatives analysis, but rather are discussed generically in the following sections."

These factors (air quality, health impacts and radiation exposures) are not inherently the same at each site under consideration. While emissions may be assumed equal at all sites, the impact of air pollution and radioactive emissions is dependent on the exposure of the population to these emissions. This exposure is governed primarily by two factors: population density in the area surrounding the plantsite, and distance to the plant boundary. The four sites are obviously different in nearby population density and distance of the proposed reactor to the site boundary. I would suspect that the Savannah River Site has both the longest distance to the boundary and the lowest nearby population of the sites under consideration; therefore would have the lowest impact. The EIS should be modified to evaluate the impact of these emissions at each site and consider both the nearby population and distance, as well as local meteorological effects.

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Thank you for consideration of my comments. I am looking forward to them being addressed in the final issue of NUREG-1811.

Richard L. Geddes
807 Big Pine Road
North Augusta, SC 29841

Cc: Senator Lindsey Graham
United States Senate
Washington, DC 20510

Senator Jim DeMint
United States Senate
Washington, DC 20510

Congressman Gresham Barrett
House of Representatives
Washington, DC 20515

Congressman Joe Wilson
House of Representatives
Washington, DC 20515

Congressman James Clyburn
House of Representatives
Washington, DC 20515

Dr. Susan Wood, Chair
Citizens for Nuclear Technology Awareness
1204 Whiskey Road
Aiken, SC 29803

Mr. Mal McKibben, Executive Director
Citizens for Nuclear Technology Awareness
1204 Whiskey Road
Aiken, SC 29803

organization:

address1: 807 Big Pine Road

address2:

city: North Augusta

state: SC

zip: 29841

country: USA

phone: 8032783842

3/9/05
RDB received

12/12/04

69FR 71854

HHH

From: Lawrence Gross <lgross@pobox.com>
To: <nrcrep@nrc.gov>
Date: Mon, Feb 28, 2005 8:39 AM
Subject: Response from "Comment on NRC Documents"

Below is the result of your feedback form. It was submitted by

Lawrence Gross (lgross@pobox.com) on Monday, February 28, 2005 at 08:39:20

Document_Title: Draft Environmental Impact Statement for an Early Site Permit (ESP) at the North Anna ESP Site (NUREG-1811)

Comments:

February 28, 2005

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration, Mailstop T-6D59
U.S. Nuclear Regulatory Commission,
Washington, DC 20555-0001

Re: North Anna ESP Permit and DEIS

Thank you for the opportunity to comment on the DEIS.

There appear to be three major flaws with the process and the project and we are hopeful that the NRC will go back and do the appropriate research and reporting, perhaps via a revised Draft EIS that meets the intent of the National Environmental Policy Act.

It appears that information about this proposed action is incomplete at this point in time and that the public has not been provided with important information that they would need if they were to be able to make relevant comments. This would be the same information that the agency would use to make an informed decision.

The three flaws are as follows:

FIRST, the ESP process takes away citizens rights to get a complete look at the proposed action. The ESP EIS only looks at certain things, the Safety Report (which was barely made available to the public) looks at others, the COL will look at others. This is not the way the National Environmental Policy Act and its implementing regulations require the system to work. Citizens and government reviewers need to be able to get a look at the big picture of a proposed action in order make informed judgments and provide input.

For example:

- Exclusion of considerations like terrorism and nuclear material transport are major flaws in the process.
- Furthermore, by creating a twenty year window for the action, the ESP process makes conclusions about the Site and its environment, that are likely not to be true soon after the ESP is approved. The window is too large given the narrow amount of data that is being provided to the public and interested local governments.

SECOND, the EIS is seriously deficient in a number of areas especially with regard to socioeconomics and the human environment. There is a rather long list of important information that is absent ranging

E-RIDS=ADM-03
c=J. Cushing (JXC9)
J. Williamson (AKW1)

SISP Review Complete

Template=ADM-013

611

from questions about impacts to striped bass to basic info about the power plant's cost, security, traffic, and plans for waste disposal. Information about how much of the cost will be borne by Dominion and how much by taxpayers is absent. Just a few examples:

- No mention is made of the impacts of the project on property values in the Lake Anna Area.
- No mention is made of the impacts of the increased warm water in the Lake on ground fog and the traffic impacts associated therewith.
- A cost estimate for the facility is not included and thus one can't do any cost-benefit analysis for its capital and operating impacts.
- The EIS basically says that all the road problems will be fixed to support transport of the huge number of construction personnel but there is no connection to the current reality in Virginia that there is limited or no money for roads. The VTRANS 2025 report is an unbiased view of the future of traffic and roads in the area and it predicts almost total gridlock along the I-95, US1 corridor within the life of the proposed project.
- The EIS is not a true NEPA document – it does not include mitigation steps and clear discussion of irreversible and irretrievable impacts.
- The DEIS says that emergency plans are okay in part because there are two hospitals in Spotsylvania. THERE ARE NO HOSPITALS IN SPOTSYLVANIA! Mary Washington Hospital in Fredericksburg is the primary hospital serving this area and it is getting stretched thin.
- The list of alternatives did not include life extension of the existing two plants or retirement of those plants.

Furthermore, the DEIS does not inform the public that private insurance will not provide total coverage for this kind of facility and that, in fact, taxpayer funds are used to self insure. Is the public informed that much of the cost of security and waste disposal is also paid for not by investors but through their tax dollars? Are we willing to provide the information to the public so they can comment on it? The NRC can waiver provisions to provide this information but it cannot waiver the legitimate rights of the public to know this information especially if you invite them to comment on the proposal.

THIRD, the project itself has real problems including inadequate cooling water, ability to support construction personnel, and emergency evacuation. Dominion's concession to use dry cooling for Unit 4 is indicative of the water limitations. We mention above the road situation relative to the movement of 5,000 construction personnel – what would happen if an evacuation was required of ten or twenty times that many people? Local infrastructure can't support this project.

Nuclear power is promoted to the public as safe, clean and cheap and yet information that would enable them to understand the specifics of that claim is not provided in this proposal and that information is key if the public is to understand the merits of this proposal especially as compared to other power-generation choices such as coal, solar and wind.

I urge you to produce as complete a record as you can and suggest that only then do we have a legitimate process to receive public input on this proposal. We thus request that the NRC issue a supplemental DEIS and defer the decision making process until the record is complete.

Sincerely,

Larry Gross – Co Chair
Jim Lynch – Co Chair
For the Battlefields Sierra Group

COPIES:

Thomas E. Capps, CEO
Dominion Resources
120 Tredegar Street

Richmond, VA 23219

Nils J. Diaz, Chairman
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Michael Town
Sierra Club Virginia Chapter

organization: Battlefields Sierra Group

address1: 10320 Shawnee Ln

address2: P.O. Box 37

city: Spotsylvania

state: VA

zip: 22553-0037

country: United States

phone: 540-786-6843

KDG received 3/9/05

12/10/04

69 FR 71854

445

From: J. R. Feagin <jfeagin@sc.rr.com>
To: <nrcrep@nrc.gov>
Date: Mon, Feb 28, 2005 4:36 PM
Subject: Response from "Comment on NRC Documents"

Below is the result of your feedback form. It was submitted by

J. R. Feagin (jfeagin@sc.rr.com) on Monday, February 28, 2005 at 16:36:11

Document_Title: Draft Environmental Impact Statement for an Early Site Permit (ESP) at the North Anna ESP Site (NUREG-1811) Draft Report for Comment

Comments: Please approve the draft environmental statement aspresentedby North Anna for an ESP at their site.

organization: as a private citizen

address1: 6606 Brasington Lane

address2:

city: Columbia

state: SC

zip: 29209-1804

country: US

phone: 803-783-1795

E-RIDS = ADM-03

Add = J. Cushing (JXC9)
A. Williamson (AKW1)

SISP Review Complete

Template = ADM-013

RDB Received 3/9/05

(446)

12/10/04
69 FR 71854

From: <pstenbjorn@roog.com>
To: <northanna_esp@nrc.gov>
Date: Fri, Feb 25, 2005 8:59 PM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Paul Stenbjorn
7622 Tanglewood Rd
Richmond, VA 23225-1151

SISP Review Complete

Template = ADM-013

E-RIDS = ADM-03
Add = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

(447)

MAR 09 2005

12/10/04

69/FR/71854

From: <paddlejunkie@rocketmail.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 9:38 AM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

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Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Arthur Schmidt
424 Russell St
Portsmouth, VA 23707-2326

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
add J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

(448)

MAR 09 2005

From: <wrichards2@cox.net>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 9:49 AM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

William Richards
2511 Patricia Ct
Falls Church, VA 22043-3233

SISP Review Complete

Template = ADM-013

E-RIDS = ADM-03
add = J. Cushing (JXC9)
A. Williamson (ARW1)

ROB Received

(449)

MAR 09 2005

From: <trish@ike-inc.net>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 10:06 AM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

patricia eichenberger
9304 University Blvd
Richmond, VA 23229-6538

SISP Review complete
Template = ADM-013

E-RIDS = ADM-03
add = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

(450)

MAR 09 2005

From: <kev-cats@att.net>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 10:10 AM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Rev Kevin Chaney
199 Winesap Rd
Madison Heights, VA 24572-2730

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
add = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

MAR 09 2005

(451)

12/10/04

69 FR 71854

From: <siljas@solo.ee>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 10:13 AM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Silja Sistok-Katz
801 N Monroe St Apt 733
Arlington, VA 22201-2374

SISP Review Complete
Template = ADM-013

620

E-RIDS = ADM-03
add = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

(452)

MAR 09 2005

12/10/04
69 FR 71854

From: <loralee13@widomaker.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Sat, Feb 26, 2005 10:21 AM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly. Lower water levels will adversely impact water-based recreational uses of the lake, for example by preventing access to boat launch ramps. Lower lake levels lead to mudflats in the back yards of homes located around the lake, and could decrease property values. The application also fails to sufficiently examine the increase in the lake temperature, which will negatively affect the striped bass population, a popular gaming fish, and other marine organisms. Waters downstream will be affected similarly.

In a time of increased terrorist threat, new nuclear power plants increase physical and economic risks to central Virginia residents, Dominion customers and shareholders, and nuclear industry employees. Al Qaeda is known to have considered nuclear power plants as a target for an attack. Terrorist threats and heightened Threat Advisory Levels (Orange and Red level) may lead to severe restrictions on public access to Lake Anna, which could impact local businesses dependent on public use of the lake. This has already happened at over a dozen lakes with nuclear plants around the country. Adding additional reactors to the North Anna facility could also increase its attractiveness as a terrorist target, increasing the frequency and likelihood of lake closures.

Safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application also doesn't consider what the effect might be on the cost of power in Virginia or nationally, or the need for new generating capacity. Virginia currently has a surplus of electrical generating capacity, so excess power will likely be sold outside the state rather than being used in-state to lower prices. Local residents will be forced to live with the risks of the nuclear plant without getting the benefits.

The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over $100 billion. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

SISP Review complete
Template = ADM-013

E-RIDS = ADM-03
add - J. Cushing (JXC9)
A. Williamson (ARW1)

Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill-trained and ill-equipped. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

There is at this time no solution to the problem of nuclear waste, and constructing new reactors will only worsen that problem. The proposed Yucca Mountain repository in Nevada will not open until 2010 at the earliest, but even industry experts feel 2015 is a more realistic best-case scenario. That doesn't count the remaining scientific questions about the suitability of the site, and the half-dozen lawsuits currently pending – any of which could send the U.S. Department of Energy back to the drawing board. Even if the facility were to open as scheduled, it's not large enough to hold even the amount of waste expected to be generated by currently-operating plants. Waste from new plants will require a new repository. Meanwhile, all the highly-radioactive irradiated fuel from the plants will continue to be stored on-site.

Emergency plans for dealing with an accident or terrorist attack are inadequate, and rely on teachers, bus drivers, doctors, and other civilians to facilitate an evacuation, without taking into account the possibility of role abandonment. Studies of the Three Mile Island accident, which took place in 1979 in Pennsylvania, found that doctors and other key workers abandoned their posts up to 25 miles from the site to tend to their families or save themselves. In the case of a more severe accident, heroic actions would be required to successfully carry out an evacuation.

In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Loralee Clark
3616 Nelms Lane

Williamsburg, VA 23185

RDB Received

(453)

MAR 09 2005

From: <aebloomsburg@aol.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Sat, Feb 26, 2005 10:28 AM
Subject: Oppose North Anna Nuclear Reactor

12/10/04
69 FR 71854

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly. Lower water levels will adversely impact water-based recreational uses of the lake, for example by preventing access to boat launch ramps. Lower lake levels lead to mudflats in the back yards of homes located around the lake, and could decrease property values. The application also fails to sufficiently examine the increase in the lake temperature, which will negatively affect the striped bass population, a popular gaming fish, and other marine organisms. Waters downstream will be affected similarly.

In a time of increased terrorist threat, new nuclear power plants increase physical and economic risks to central Virginia residents, Dominion customers and shareholders, and nuclear industry employees. Al Qaeda is known to have considered nuclear power plants as a target for an attack. Terrorist threats and heightened Threat Advisory Levels (Orange and Red level) may lead to severe restrictions on public access to Lake Anna, which could impact local businesses dependent on public use of the lake. This has already happened at over a dozen lakes with nuclear plants around the country. Adding additional reactors to the North Anna facility could also increase its attractiveness as a terrorist target, increasing the frequency and likelihood of lake closures.

Safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application also doesn't consider what the effect might be on the cost of power in Virginia or nationally, or the need for new generating capacity. Virginia currently has a surplus of electrical generating capacity, so excess power will likely be sold outside the state rather than being used in-state to lower prices. Local residents will be forced to live with the risks of the nuclear plant without getting the benefits.

The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over $100 billion. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

SISP Review Complete
Template = ADM-013

624

E-RIDS = ADM-03
add = J. Cushing (JXC9)
A. Williamson (ARW1)

Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill-trained and ill-equipped. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

There is at this time no solution to the problem of nuclear waste, and constructing new reactors will only worsen that problem. The proposed Yucca Mountain repository in Nevada will not open until 2010 at the earliest, but even industry experts feel 2015 is a more realistic best-case scenario. That doesn't count the remaining scientific questions about the suitability of the site, and the half-dozen lawsuits currently pending – any of which could send the U.S. Department of Energy back to the drawing board. Even if the facility were to open as scheduled, it's not large enough to hold even the amount of waste expected to be generated by currently-operating plants. Waste from new plants will require a new repository. Meanwhile, all the highly-radioactive irradiated fuel from the plants will continue to be stored on-site.

Emergency plans for dealing with an accident or terrorist attack are inadequate, and rely on teachers, bus drivers, doctors, and other civilians to facilitate an evacuation, without taking into account the possibility of role abandonment. Studies of the Three Mile Island accident, which took place in 1979 in Pennsylvania, found that doctors and other key workers abandoned their posts up to 25 miles from the site to tend to their families or save themselves. In the case of a more severe accident, heroic actions would be required to successfully carry out an evacuation.

In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Above and beyond all of this, as someone who was born and raised near the Hanford Nuclear Reservation I have seen the reality of nuclear contamination on the human body: it's so ugly. Watching people die slowly

and painfully from contaminated water and air and soil--no one wants that on their conscience. I know you don't. If I didn't send this letter, it would be on my conscience too. Please, Virginia doesn't deserve more environmental degradation. She's so beautiful! Her people don't deserve it either.

anne bloomsburg
1806 Grove Avenue
Richmond, VA 23220

ROB Received

(454)

MAR 09 2005

12/10/04
69 FR 71854

From: <erthshr@comcast.net>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 10:40 AM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

The public hearing, delayed by snow and rescheduled, needs to be repeated. The hearing on February 17th did not afford time for all who wished to present testimony and conditions were very bad for all constituents. The format was not well controlled and executed. Please hold another public hearing in a better venue.

I would like to be advised of the developments of this case.

Sincerely,

Diana Parker
10700 CHALKLEY RD
RICHMOND, VA 23237-4048

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Cc = J. Cushing (JXC9)
A. Williamson (ARW1)

RAB Received

(455)

MAR 09 2005

From: <dblaverdiere@cavtel.net>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 10:49 AM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

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Sincerely,

Dorothy Laverdiere
3212 Edinburgh Dr
Virginia Beach, VA 23452-5804

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
add = J. Cushing (JXC9)
A. Williamson (ARW1)

628

iDB Received
(456)
MAR 09 2005
12/10/04
69 FR 71854

From: <ksv3n@virginia.edu>
To: <NorthAnna_ESP@nrc.gov>
Date: Sat, Feb 26, 2005 10:55 AM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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SISP Review Complete
Template = ADM-013
E-RIDS = ADM-03
add = J. Cushing (JXC9)
A. Williamson (ARW1)
629

Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

katrina von Briesen
p.o.box 36

batesville, VA 22924

RDB Received

(457)

MAR 09 2005

12/10/04

69 FR 71854

From: <theozfamilyqueen@yahoo.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 10:56 AM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Until we have found a way to safely dispose of waste heat without negatively impacting the natural world around us, building additional reactors is simply not an acceptable action. We must protect our world...it is the only one we have.

Sincerely,

Sarah Hepler
620 Suhtai Ct Apt 302
Virginia Beach, VA 23451-6062

SISP Review Complete
Template = ADM-013

632

E-RIDS = ADM-03
add = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

(458)

MAR 09 2005

From: <laryatthelake@msn.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 11:10 AM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04

69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Lawrence Pierce
3 Bunker Blvd
Palmyra, VA 22963-2506

SISP Review Complete

Template = ADM-013

E-RIDS = ADM-03

Add = J. Cushing (JXC9)

A. Williamson (ARW1)

RDB Received

459

MAR 09 2005

From: <annemcgurk@mindspring.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Sat, Feb 26, 2005 11:23 AM
Subject: Oppose North Anna Nuclear Reactor

12/10/04
69 FR 71854

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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In a time of increased terrorist threat, new nuclear power plants increase physical and economic risks to central Virginia residents, Dominion customers and shareholders, and nuclear industry employees. Al Qaeda is known to have considered nuclear power plants as a target for an attack. Terrorist threats and heightened Threat Advisory Levels (Orange and Red level) may lead to severe restrictions on public access to Lake Anna, which could impact local businesses dependent on public use of the lake. This has already happened at over a dozen lakes with nuclear plants around the country. Adding additional reactors to the North Anna facility could also increase its attractiveness as a terrorist target, increasing the frequency and likelihood of lake closures.

Safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application also doesn't consider what the effect might be on the cost of power in Virginia or nationally, or the need for new generating capacity. Virginia currently has a surplus of electrical generating capacity, so excess power will likely be sold outside the state rather than being used in-state to lower prices. Local residents will be forced to live with the risks of the nuclear plant without getting the benefits.

The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over $100 billion. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add - J. Cushing (JXC9)
A. Williamson (ARW1)

634

Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill-trained and ill-equipped. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

There is at this time no solution to the problem of nuclear waste, and constructing new reactors will only worsen that problem. The proposed Yucca Mountain repository in Nevada will not open until 2010 at the earliest, but even industry experts feel 2015 is a more realistic best-case scenario. That doesn't count the remaining scientific questions about the suitability of the site, and the half-dozen lawsuits currently pending – any of which could send the U.S. Department of Energy back to the drawing board. Even if the facility were to open as scheduled, it's not large enough to hold even the amount of waste expected to be generated by currently-operating plants. Waste from new plants will require a new repository. Meanwhile, all the highly-radioactive irradiated fuel from the plants will continue to be stored on-site.

Emergency plans for dealing with an accident or terrorist attack are inadequate, and rely on teachers, bus drivers, doctors, and other civilians to facilitate an evacuation, without taking into account the possibility of role abandonment. Studies of the Three Mile Island accident, which took place in 1979 in Pennsylvania, found that doctors and other key workers abandoned their posts up to 25 miles from the site to tend to their families or save themselves. In the case of a more severe accident, heroic actions would be required to successfully carry out an evacuation.

In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Anne McGurk

618 South Pitt Street
Alexandria, VA 22314

RDB Received

(460)

MAR 09 2005

From: <pamdkim@yahoo.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 11:23 AM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04

69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Pamela Kim
6034 Richmond Hwy Apt 617
Alexandria, VA 22303-2100

SISP Review Complete

Template = ADM-013

637

E-RIDS = ADM-03
add: J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

(461)

MAR 09 2005

From: <nottafrm@cstone.net>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 11:33 AM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

Rhea Baldino
2575 Lake Albemarle Rd
Charlottesville, VA 22901-5135

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
add = J. Cushing (JXC9)
A. Williamson (ARW1)

638

RDB Received

(462)

MAR 09 2005

12/10/04
69 FR 71854

From: <rsb0011@mindspring.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Sat, Feb 26, 2005 2:26 PM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add - J. Cushing (JXC9)
A. Williamson (ARW1)

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

rachel bobbitt
16245 derby ridge rd

montpelier, VA 23192

RDB Received

(463)

MAR 09 2005

12/10/04

69 FR 71854

From: <aclement65@hotmail.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Sat, Feb 26, 2005 2:35 PM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly. Lower water levels will adversely impact water-based recreational uses of the lake, for example by preventing access to boat launch ramps. Lower lake levels lead to mudflats in the back yards of homes located around the lake, and could decrease property values. The application also fails to sufficiently examine the increase in the lake temperature, which will negatively affect the striped bass population, a popular gaming fish, and other marine organisms. Waters downstream will be affected similarly.

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SISP Review Complete
Template = ADM-013

642

E-RIDS = ADM-03
add J. Cushing (JXC4)
A. Williamson (CARW1)

Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Audrey Clement
5709 10th Road North

Apt A
Arlington, VA 22205

RDB Received

MAR 09 2005

(464)

12/10/04
69 FR 71854

From: <dennison@ceva.net>
To: <NorthAnna_ESP@nrc.gov>
Date: Sat, Feb 26, 2005 2:57 PM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
645 add = J. Cushing (JXC9)
A. Williamson (ARW1)

Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Tom Dennison

RR1 Box113
New Canton, VA 23123

RDB Received

(465)

MAR 09 2005

From: <jazbase@cox.net>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 3:42 PM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

James Masters
397 Little Neck Rd
3300 Building, Ste 200
Virginia Beach, VA 23452-5765

SISP Review complete
Template = ADM-013

E-RIDS = ADM-03
add = J. Cushing (JXC9)
A. Williamson (ARW1)

648

RDB Received

(466)

MAR 09 2005

From: <lpalmerl@earthlink.net>
To: <NorthAnna_ESP@nrc.gov>
Date: Sat, Feb 26, 2005 4:02 PM
Subject: Oppose North Anna Nuclear Reactor

12/10/04
69 FR 71854

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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SISP Review Complete
Template = ADM-013

649

ERIDS = ADM-03
addl = J. Cushing (JXC9)
A. Williamson (ARW1)

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Liz palmer
2958 mechum banks drive

charlottesville, VA 22901

RDB Received

(467) MAR 09 2005

12/10/04

69 FR 71854

From: <peggygilges@mac.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Sat, Feb 26, 2005 4:22 PM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly. Lower water levels will adversely impact water-based recreational uses of the lake, for example by preventing access to boat launch ramps. Lower lake levels lead to mudflats in the back yards of homes located around the lake, and could decrease property values. The application also fails to sufficiently examine the increase in the lake temperature, which will negatively affect the striped bass population, a popular gaming fish, and other marine organisms. Waters downstream will be affected similarly.

In a time of increased terrorist threat, new nuclear power plants increase physical and economic risks to central Virginia residents, Dominion customers and shareholders, and nuclear industry employees. Al Qaeda is known to have considered nuclear power plants as a target for an attack. Terrorist threats and heightened Threat Advisory Levels (Orange and Red level) may lead to severe restrictions on public access to Lake Anna, which could impact local businesses dependent on public use of the lake. This has already happened at over a dozen lakes with nuclear plants around the country. Adding additional reactors to the North Anna facility could also increase its attractiveness as a terrorist target, increasing the frequency and likelihood of lake closures.

Safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application also doesn't consider what the effect might be on the cost of power in Virginia or nationally, or the need for new generating capacity. Virginia currently has a surplus of electrical generating capacity, so excess power will likely be sold outside the state rather than being used in-state to lower prices. Local residents will be forced to live with the risks of the nuclear plant without getting the benefits.

The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over $100 billion. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

SISP Review Complete
Template = ADM-013

652

E-RIDS = ADM-03
add = J. Cushing (JXC9)
A. Williamson (ARW1)

Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

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Emergency plans for dealing with an accident or terrorist attack are inadequate, and rely on teachers, bus drivers, doctors, and other civilians to facilitate an evacuation, without taking into account the possibility of role abandonment. Studies of the Three Mile Island accident, which took place in 1979 in Pennsylvania, found that doctors and other key workers abandoned their posts up to 25 miles from the site to tend to their families or save themselves. In the case of a more severe accident, heroic actions would be required to successfully carry out an evacuation.

In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Margaret Gilges
6225 Sugar Hollow Rd.

Crozet, VA 22932

RDB Received

(468)

MAR 09 2005

12/10/04

69 FR 71854

From: <sundchristian@hotmail.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 4:24 PM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

christian sund
9238 Old Ivy Trce
Mechanicsville, VA 23116-2760

SISP Review Complete

Template = ADM-013

655

E-RIDS = ADM-03
add = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

(469) MAR 09 2005

From: <cheryl_web@msn.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Sat, Feb 26, 2005 4:25 PM
Subject: Oppose North Anna Nuclear Reactor

12/10/04
69 FR 71854

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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SISP Review Complete
Template = ADM-013

656

E-RIDS = ADM-03
add - J. Cushing (JXC9)
D. Williamson (ARW1)

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

cheryl weber
3703 glade hill circle

roanoke, VA 24012

RDB Received

(470)

MAR 09 2005

From: <joseph@moonstar.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 4:50 PM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

And what are you going to do with the waste for the next 10,000,000 years?!

Sincerely,

Joseph Patrick Anthony
RR 1 Box 2975
Buckingham, VA 23921-9745

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
add J. Cushing (JXC9)
A. Williamson (AEW1)

ROB Received

(471)

MAR 09 2005

From: <avers@attglobal.net>
To: <NorthAnna_ESP@nrc.gov>
Date: Sat, Feb 26, 2005 5:29 PM
Subject: Support -- North Anna Nuclear Reactor

12/10/04

69 FR 71854

Dear Chief Lesar

Please register my support for any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia.

Carl Avers
7 Lakeview Circle
Palmyra, VA 22963

SISP Review Complete

Template = ADM-013

E-RID = ADM-03

Adol J. Cushing (JXC9)

A. Williamson (ARW1)

RDB Received

(472)

MAR 09 2005

12/10/04

69 FR 71854

From: <kimoreno16@netzero.net>
To: <NorthAnna_ESP@nrc.gov>
Date: Sat, Feb 26, 2005 5:41 PM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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SISP Review Complete

Template = ADM-013

E-RIDS = ADM-03

add = J. Cushing (JXC9)

A. Williamson (ARW1)

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Kimberly Moreno
1448 E. Overlook Dr.

Powhatan, VA 23139

RPB Received

(473)

MAR 09 2005

From: <stevemills03@comcast.net>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 5:43 PM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

Stephen Mills
3000 Spout Run Pkwy Apt A107
Arlington, VA 22201-4209

SISP Review Complete
Template = ADM-013

664

E-RIDS = ADM-03
Add = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

(474)

MAR 09 2005

From: <emakton@hotmail.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 5:44 PM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

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Sincerely,

Michelle Acton
4001 9th St N Apt 1421
Arlington, VA 22203-1967

ESP Review Complete
Template = ADM-013

665

ERIAS = ADM-03
addl = J. Cushing (JKC9)
A. Williamson (ARW1)

RDB Received
MAR 09 2005

(475)

From: <dlcjmb@peoplepc.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 11:47 AM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

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Sincerely,

David Campbell
1033 Emory Pl
Virginia Beach, VA 23464-8319

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
add = J. Cushing (JXC9)
A. Williamsen (AKW1)

RDB Received
MAR 09 2005

(476)

From: <judeaudio@verizon.net>
To: <NorthAnna_ESP@nrc.gov>
Date: Sat, Feb 26, 2005 12:00 PM
Subject: Oppose North Anna Nuclear Reactor

12/10/04
69 FR 71854

Dear Chief Lesar

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SISP Review Complete
Template = ADM-013

667

ERIDS = ADM-03
add = J. Cushing (JXC9)
A. Williamson (ARW1)

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Judith Ostrowski
240 Jefferson Ave. #5

Danville, VA 24541

RDB Received
MAR 09 2005

(477)

12/10/04
69 FR 71854

From: <clickandragon@earthlink.net>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 12:15 PM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

Susan Davis
6348 Pocahontas Club Rd
Virginia Beach, VA 23457-1260

SISP Review Complete
Template = ADM-013

670

ERIDS = ADM-03
Add = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

(478)

MAR 09 2005

From: <geekusa23@hotmail.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 12:24 PM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71857

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Lori C
3312 Milissa St
Virginia Beach, VA 23464-1722

SISP Review Complete
Template = ADM-013

671

E-RIDS = ADM-03
add = J. Cushing (JXC9)
A. Williamson (AREW1)

RDB Received

MAR 09 2005

(479)

From: <jonlotz4@hotmail.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 12:28 PM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Jonathan Lotz
2163 Astoria Cir Apt 302
Herndon, VA 20170-4091

SISP Review complete

Template = ADM-013

ERIDS = ADM-03
add = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

MAR 09 2005

480

From: <annejameson@yahoo.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 12:31 PM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Anne Jameson
9808 Oleander Ave
Vienna, VA 22181-6039

SISP Review Complete
Template = ADM-013

673

ERIDS = ADM-03
add = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received
MAR 09 2005

(481)

From: <stevebmw@earthlink.net>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 1:00 PM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Stephen Anderson
4425 Gov Almond Rd
Locust Grove, VA 22508-2409

SISP Review Complete
Template = ADM-013

674

ERIDS = ADM-03
add: J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received
MAR 09 2005

(482)

12/10/04
69 FR 71854

From: <mnzoo@comcast.net>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 12:39 PM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Finally, we still do not have a sane or safe plan for handling nuclear waste from nuclear plants. Until we can handle our waste properly, we should avoid making it.

Sincerely,

Louise Mann
10201 River Rd
Petersburg, VA 23803-1048

SISP Review Complete
Template = ADM-013

675

ERIDS = ADM-03
addel = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

MAR 09 2005

(483)

12/10/04
69 FR 71854

From: <kathyjoseph@verizon.net>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 1:01 PM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Kathy Joseph
11122 Boathouse Ct
Reston, VA 20191-4300

SISP Review Complete
Template = ADM-013

ERIDS = ADM-03
Add = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

(484)

MAR 09 2005

12|10|04

69 FR 71854

From: <sokolr@yahoo.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Sat, Feb 26, 2005 1:14 PM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly. Lower water levels will adversely impact water-based recreational uses of the lake, for example by preventing access to boat launch ramps. Lower lake levels lead to mudflats in the back yards of homes located around the lake, and could decrease property values. The application also fails to sufficiently examine the increase in the lake temperature, which will negatively affect the striped bass population, a popular gaming fish, and other marine organisms. Waters downstream will be affected similarly.

In a time of increased terrorist threat, new nuclear power plants increase physical and economic risks to central Virginia residents, Dominion customers and shareholders, and nuclear industry employees. Al Qaeda is known to have considered nuclear power plants as a target for an attack. Terrorist threats and heightened Threat Advisory Levels (Orange and Red level) may lead to severe restrictions on public access to Lake Anna, which could impact local businesses dependent on public use of the lake. This has already happened at over a dozen lakes with nuclear plants around the country. Adding additional reactors to the North Anna facility could also increase its attractiveness as a terrorist target, increasing the frequency and likelihood of lake closures.

Safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application also doesn't consider what the effect might be on the cost of power in Virginia or nationally, or the need for new generating capacity. Virginia currently has a surplus of electrical generating capacity, so excess power will likely be sold outside the state rather than being used in-state to lower prices. Local residents will be forced to live with the risks of the nuclear plant without getting the benefits.

The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over $100 billion. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

SISP Review Complete
Template = ADM-013

677

ERIDS = ADM-03
add = J. Cushing (JXC9)
A. Williamson (ARW1)

Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill-trained and ill-equipped. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

There is at this time no solution to the problem of nuclear waste, and constructing new reactors will only worsen that problem. The proposed Yucca Mountain repository in Nevada will not open until 2010 at the earliest, but even industry experts feel 2015 is a more realistic best-case scenario. That doesn't count the remaining scientific questions about the suitability of the site, and the half-dozen lawsuits currently pending – any of which could send the U.S. Department of Energy back to the drawing board. Even if the facility were to open as scheduled, it's not large enough to hold even the amount of waste expected to be generated by currently-operating plants. Waste from new plants will require a new repository. Meanwhile, all the highly-radioactive irradiated fuel from the plants will continue to be stored on-site.

Emergency plans for dealing with an accident or terrorist attack are inadequate, and rely on teachers, bus drivers, doctors, and other civilians to facilitate an evacuation, without taking into account the possibility of role abandonment. Studies of the Three Mile Island accident, which took place in 1979 in Pennsylvania, found that doctors and other key workers abandoned their posts up to 25 miles from the site to tend to their families or save themselves. In the case of a more severe accident, heroic actions would be required to successfully carry out an evacuation.

In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Ron Sokol
3051 Mowles Rd.

Salem, VA 24153

RDB Received

MAR 09 2005

(485)

2|10|04
69 FR 71854

From: <mtalk@sbcglobal.net>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 1:39 PM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Lisa Marshall
15023 Rain Shadow Ct
Houston, TX 77070-1007

SISP Review Complete
Template = ADM-013

ERIDS = ADM-03
Addl = J. Cushing (JXC9)
A. Williamson (ARW1)

680

(486)

RDB Received
MAR 09 2005

From: <pegmeister@mmmbeads.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 9:17 AM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Margaret Meister
5404 Hampton Blvd
Norfolk, VA 23508-1558

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
add J. Cushing (JXC9)
A. Williamson (ARW1)

(487)

RDB Received
MAR 09 2005

From: <barbaramartin1@cox.net>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 9:18 AM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Barbara Martin
609 Gladesdale Dr
Chesapeake, VA 23322-9113

SISP Review Complete
Template = ADM013

682

ERIDS = ADM-03
add: J. Cushing (JXC9)
A. Williamson (ARW1)

(488)

RDB Received
MAR 09 2005

From: <corny@swva.net>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 9:22 AM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Cornelia Lewis
858 Free Union Rd
Meadows of Dan, VA 24120-3811

SISP Review Complete
Template = ADM-013

683

ERIDS = ADM-03
add - J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

(489)

MAR 09 2005

From: <bothermenot@nexet.net>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 9:36 AM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04 69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Linda Hanson
106 Wilson Ct
Charlottesville, VA 22901-2942

SISP Review Complete
Template = ADM-013

684

ERID = ADM-03
add'l = J. Cushing (JXC9)
A. Williamsm (AREW1)

RDB Received

(490)

MAR 09 2005

From: <fcollins2@juno.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 9:16 AM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

Fletcher Collins
1607 Hilliard Rd
Richmond, VA 23228-4707

SISP Review Complete
Template = ADM-013

685

ERIDS = ADM-03
add = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

(491)

MAR 09 2005

12/10/04

69 FR 71854

From: <nimettler@comcast.net>
To: <NorthAnna_ESP@nrc.gov>
Date: Sat, Feb 26, 2005 9:10 AM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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In a time of increased terrorist threat, new nuclear power plants increase physical and economic risks to central Virginia residents, Dominion customers and shareholders, and nuclear industry employees. Al Qaeda is known to have considered nuclear power plants as a target for an attack. Terrorist threats and heightened Threat Advisory Levels (Orange and Red level) may lead to severe restrictions on public access to Lake Anna, which could impact local businesses dependent on public use of the lake. This has already happened at over a dozen lakes with nuclear plants around the country. Adding additional reactors to the North Anna facility could also increase its attractiveness as a terrorist target, increasing the frequency and likelihood of lake closures.

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The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over $100 billion. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

SISP Review Complete

Template = ADM-013

686

E. RIDS = ADM-03

add = J. Cushing (JXC9)

A. Williamson (ARW1)

Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill-trained and ill-equipped. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

There is at this time no solution to the problem of nuclear waste, and constructing new reactors will only worsen that problem. The proposed Yucca Mountain repository in Nevada will not open until 2010 at the earliest, but even industry experts feel 2015 is a more realistic best-case scenario. That doesn't count the remaining scientific questions about the suitability of the site, and the half-dozen lawsuits currently pending – any of which could send the U.S. Department of Energy back to the drawing board. Even if the facility were to open as scheduled, it's not large enough to hold even the amount of waste expected to be generated by currently-operating plants. Waste from new plants will require a new repository. Meanwhile, all the highly-radioactive irradiated fuel from the plants will continue to be stored on-site.

Emergency plans for dealing with an accident or terrorist attack are inadequate, and rely on teachers, bus drivers, doctors, and other civilians to facilitate an evacuation, without taking into account the possibility of role abandonment. Studies of the Three Mile Island accident, which took place in 1979 in Pennsylvania, found that doctors and other key workers abandoned their posts up to 25 miles from the site to tend to their families or save themselves. In the case of a more severe accident, heroic actions would be required to successfully carry out an evacuation.

In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Nicole Mettler
9016 Mulholland Dr.

Glen Allen, VA 23059

RDB Received

MAR 09 2005

(492)

12/10/04

69 FR 71854

From: <czarina23113@yahoo.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 9:05 AM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Jacqueline Bowman
1616 Colehollow Dr
Midlothian, VA 23113-4015

SISP Review Complete

Template = ADM-013

ERIDS = ADM-03

add = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

MAR 09 2005

(493)

12/10/04

69 FR 71854

From: <revise@erols.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 8:47 AM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

especially in this time of terrorism we do not need more nuclear plants
for once let us consider the harmfulness to our environment. The way things are going there will be nothing left for future generations to enjoy. Let's work on find another way to work on increasing energy demands....

Sincerely,

Nancy.re
8120 Old Oaks Dr
Springfield, VA 22152-1819

SISP Review Complete
Template = ADM-013

690

ENDS = ADM-03
add = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received
3/9/05

(494)

From: <lilliemilyhoffman@earthlink.net>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 8:20 AM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Lilli Hoffman
408 E Market St Apt 301
Charlottesville, VA 22902-5282

SISP Review Complete
Template= ADM-013

691

RIDS = ADM-03
addl= J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received 3/9/05

(495)

From: <mldconsulting@comcast.net>
To: <northanna_esp@nrc.gov>
Date: Fri, Feb 25, 2005 9:27 PM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04 69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

In Spain they use windmills to provide much of the electrical power. This is cheaper, safer, and already being used in parts of California. We do not need to risk the use of nuclear power when there are cheaper and better alternatives for generating electricity. Other methods for generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Martha Desrosiers
2251 Cedar Cove Ct
Reston, VA 20191-4100

SISP Review Complete Template = ADM-013

692

ERIDS = ADM-03
ADD = J Cushing (JXC9)
A. Williamson (ARW1)

RDB Received
3/9/05

(496)

12/10/04
69 FR 71854

From: <dougou@cox.net>
To: <northanna_esp@nrc.gov>
Date: Fri, Feb 25, 2005 9:31 PM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Carol Rose
9097 Tiffany Park Ct
Springfield, VA 22152-2198

SISP Review Complete
Template = ADM-013

693

ERIDS = ADM-03
Addl = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

MAR 09 2005

(497)

12/10/04
69 FR 71854

From: <zsw4t@virginia.edu>
To: <NorthAnna_ESP@nrc.gov>
Date: Fri, Feb 25, 2005 9:42 PM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly. Lower water levels will adversely impact water-based recreational uses of the lake, for example by preventing access to boat launch ramps. Lower lake levels lead to mudflats in the back yards of homes located around the lake, and could decrease property values. The application also fails to sufficiently examine the increase in the lake temperature, which will negatively affect the striped bass population, a popular gaming fish, and other marine organisms. Waters downstream will be affected similarly.

In a time of increased terrorist threat, new nuclear power plants increase physical and economic risks to central Virginia residents, Dominion customers and shareholders, and nuclear industry employees. Al Qaeda is known to have considered nuclear power plants as a target for an attack. Terrorist threats and heightened Threat Advisory Levels (Orange and Red level) may lead to severe restrictions on public access to Lake Anna, which could impact local businesses dependent on public use of the lake. This has already happened at over a dozen lakes with nuclear plants around the country. Adding additional reactors to the North Anna facility could also increase its attractiveness as a terrorist target, increasing the frequency and likelihood of lake closures.

Safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application also doesn't consider what the effect might be on the cost of power in Virginia or nationally, or the need for new generating capacity. Virginia currently has a surplus of electrical generating capacity, so excess power will likely be sold outside the state rather than being used in-state to lower prices. Local residents will be forced to live with the risks of the nuclear plant without getting the benefits.

The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over $100 billion. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

ESP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add = J. Cushing (JXC9)
A. Williamson (ARW1)

Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill-trained and ill-equipped. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

There is at this time no solution to the problem of nuclear waste, and constructing new reactors will only worsen that problem. The proposed Yucca Mountain repository in Nevada will not open until 2010 at the earliest, but even industry experts feel 2015 is a more realistic best-case scenario. That doesn't count the remaining scientific questions about the suitability of the site, and the half-dozen lawsuits currently pending -- any of which could send the U.S. Department of Energy back to the drawing board. Even if the facility were to open as scheduled, it's not large enough to hold even the amount of waste expected to be generated by currently-operating plants. Waste from new plants will require a new repository. Meanwhile, all the highly-radioactive irradiated fuel from the plants will continue to be stored on-site.

Emergency plans for dealing with an accident or terrorist attack are inadequate, and rely on teachers, bus drivers, doctors, and other civilians to facilitate an evacuation, without taking into account the possibility of role abandonment. Studies of the Three Mile Island accident, which took place in 1979 in Pennsylvania, found that doctors and other key workers abandoned their posts up to 25 miles from the site to tend to their families or save themselves. In the case of a more severe accident, heroic actions would be required to successfully carry out an evacuation.

In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Zaahira Wyne
95 Boscobel Road

Fredericksburg, VA 22405

RD B Received

MAR 09 2005

(498)

12/10/04

69 FR 71854

From: <dcole007@adelphia.net>
To: <northanna_esp@nrc.gov>
Date: Fri, Feb 25, 2005 9:49 PM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Darlene Coleman
PO Box 3013
1016 Warwick Drive
Staunton, VA 24402-3013

SISP Review Complete

Template = ADM-013

697

E-RIDS = ADM-03

Add = J. Cushing (JXC9)

A. Williamson (ARW1)

RDB Received

MAR 09 2005

(499)

12/10/04

69 FR 71854

From: <donnagw@yahoo.com>
To: <northanna_esp@nrc.gov>
Date: Fri, Feb 25, 2005 9:59 PM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Donna Wellman
4201 Wilson Blvd Ste 110
Arlington, VA 22203-1859

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

(500)

MAR 09 2005

12/10/04
69 FR 71854

From: <judy.popelas@juno.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Fri, Feb 25, 2005 9:49 PM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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In a time of increased terrorist threat, new nuclear power plants increase physical and economic risks to central Virginia residents, Dominion customers and shareholders, and nuclear industry employees. Al Qaeda is known to have considered nuclear power plants as a target for an attack. Terrorist threats and heightened Threat Advisory Levels (Orange and Red level) may lead to severe restrictions on public access to Lake Anna, which could impact local businesses dependent on public use of the lake. This has already happened at over a dozen lakes with nuclear plants around the country. Adding additional reactors to the North Anna facility could also increase its attractiveness as a terrorist target, increasing the frequency and likelihood of lake closures.

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The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over $100 billion. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add = J. Cushing (JXC9)
A. Williamson (ARW1)

699

Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill-trained and ill-equipped. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

There is at this time no solution to the problem of nuclear waste, and constructing new reactors will only worsen that problem. The proposed Yucca Mountain repository in Nevada will not open until 2010 at the earliest, but even industry experts feel 2015 is a more realistic best-case scenario. That doesn't count the remaining scientific questions about the suitability of the site, and the half-dozen lawsuits currently pending – any of which could send the U.S. Department of Energy back to the drawing board. Even if the facility were to open as scheduled, it's not large enough to hold even the amount of waste expected to be generated by currently-operating plants. Waste from new plants will require a new repository. Meanwhile, all the highly-radioactive irradiated fuel from the plants will continue to be stored on-site.

Emergency plans for dealing with an accident or terrorist attack are inadequate, and rely on teachers, bus drivers, doctors, and other civilians to facilitate an evacuation, without taking into account the possibility of role abandonment. Studies of the Three Mile Island accident, which took place in 1979 in Pennsylvania, found that doctors and other key workers abandoned their posts up to 25 miles from the site to tend to their families or save themselves. In the case of a more severe accident, heroic actions would be required to successfully carry out an evacuation.

In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Judy Popelas
1824 Lonicera Way

Charlottesville, VA 22911

ADM Received

MAR 09 2005

(501)

12/10/04
69 FR 71854

From: <jshematek119@yahoo.com>
To: <northanna_esp@nrc.gov>
Date: Fri, Feb 25, 2005 10:01 PM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

Judith Shematek
119 Chisman Lndg
Seaford, VA 23696-2345

SISP Review Complete
Template = ADM-013

ERIDS = ADM-03
Add = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

MAR 09 2005

(502)

From: <radross9@aol.com>
To: <northanna_esp@nrc.gov>
Date: Fri, Feb 25, 2005 10:17 PM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

Ross Feitlinger
3643 E Galvin St
Cave Creek, AZ 85331-9530

SISP Review Complete
Template = ADM-013

703

E-RIDS = ADM-03
Addl = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

MAR 09 2005

(503)

From: <cnicholas@quatrx.com>
To: <northanna_esp@nrc.gov>
Date: Fri, Feb 25, 2005 10:19 PM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

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Sincerely,

Chris Nicholas
3509 Wedgewood Ct
Keswick, VA 22947-9180

SISP Review Complete
Template = ADM-013

704

E-RIDS = ADM-03
Add = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

MAR 09 2005

(504)

12/10/04
69 FR 71854

From: <KEITHCROGHAN@HOTMAIL.COM>
To: <NorthAnna_ESP@nrc.gov>
Date: Fri, Feb 25, 2005 10:33 PM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add = J. Cushing (JXC9)
A. Williamson (ARW1)

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KEITH CROGHAN
376 moonshadow lane

Trevilians, VA 23093

ROB Received

MAR 09 2005

(505)

From: <mcc99@hotmail.com>
To: <northanna_esp@nrc.gov>
Date: Fri, Feb 25, 2005 10:39 PM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Matthew Campbell
5906 Langton Dr
Alexandria, VA 22310-1754

SISP Review Complete
Template = ADM-013

ERIDS = ADM-03
add - J. Cushing (JXC9)
A. Williamson (ARW1)

708

ROB Received

MAR 09 2005

(506)

12/10/04

69 FR 71854

From: <sawdon@msn.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Fri, Feb 25, 2005 10:42 PM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly. Lower water levels will adversely impact water-based recreational uses of the lake, for example by preventing access to boat launch ramps. Lower lake levels lead to mudflats in the back yards of homes located around the lake, and could decrease property values. The application also fails to sufficiently examine the increase in the lake temperature, which will negatively affect the striped bass population, a popular gaming fish, and other marine organisms. Waters downstream will be affected similarly.

In a time of increased terrorist threat, new nuclear power plants increase physical and economic risks to central Virginia residents, Dominion customers and shareholders, and nuclear industry employees. Al Qaeda is known to have considered nuclear power plants as a target for an attack. Terrorist threats and heightened Threat Advisory Levels (Orange and Red level) may lead to severe restrictions on public access to Lake Anna, which could impact local businesses dependent on public use of the lake. This has already happened at over a dozen lakes with nuclear plants around the country. Adding additional reactors to the North Anna facility could also increase its attractiveness as a terrorist target, increasing the frequency and likelihood of lake closures.

Safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application also doesn't consider what the effect might be on the cost of power in Virginia or nationally, or the need for new generating capacity. Virginia currently has a surplus of electrical generating capacity, so excess power will likely be sold outside the state rather than being used in-state to lower prices. Local residents will be forced to live with the risks of the nuclear plant without getting the benefits.

The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over $100 billion. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

SISP Review Complete
Template = ADM-013

709

ERIDS = ADM-03
Add = J. Cushing (JXC9)
A. Williamson (ARW1)

Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill-trained and ill-equipped. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

There is at this time no solution to the problem of nuclear waste, and constructing new reactors will only worsen that problem. The proposed Yucca Mountain repository in Nevada will not open until 2010 at the earliest, but even industry experts feel 2015 is a more realistic best-case scenario. That doesn't count the remaining scientific questions about the suitability of the site, and the half-dozen lawsuits currently pending – any of which could send the U.S. Department of Energy back to the drawing board. Even if the facility were to open as scheduled, it's not large enough to hold even the amount of waste expected to be generated by currently-operating plants. Waste from new plants will require a new repository. Meanwhile, all the highly-radioactive irradiated fuel from the plants will continue to be stored on-site.

Emergency plans for dealing with an accident or terrorist attack are inadequate, and rely on teachers, bus drivers, doctors, and other civilians to facilitate an evacuation, without taking into account the possibility of role abandonment. Studies of the Three Mile Island accident, which took place in 1979 in Pennsylvania, found that doctors and other key workers abandoned their posts up to 25 miles from the site to tend to their families or save themselves. In the case of a more severe accident, heroic actions would be required to successfully carry out an evacuation.

In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Rosemarie Sawdon
P. O. Box 125

Blacksburg, VA 24063

RDB Received

(507)

MAR 09 2005

From: <itri86@aol.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Fri, Feb 25, 2005 10:55 PM
Subject: Oppose North Anna Nuclear Reactor

12/10/04
69 FR 71857

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly. Lower water levels will adversely impact water-based recreational uses of the lake, for example by preventing access to boat launch ramps. Lower lake levels lead to mudflats in the back yards of homes located around the lake, and could decrease property values. The application also fails to sufficiently examine the increase in the lake temperature, which will negatively affect the striped bass population, a popular gaming fish, and other marine organisms. Waters downstream will be affected similarly.

In a time of increased terrorist threat, new nuclear power plants increase physical and economic risks to central Virginia residents, Dominion customers and shareholders, and nuclear industry employees. Al Qaeda is known to have considered nuclear power plants as a target for an attack. Terrorist threats and heightened Threat Advisory Levels (Orange and Red level) may lead to severe restrictions on public access to Lake Anna, which could impact local businesses dependent on public use of the lake. This has already happened at over a dozen lakes with nuclear plants around the country. Adding additional reactors to the North Anna facility could also increase its attractiveness as a terrorist target, increasing the frequency and likelihood of lake closures.

Safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application also doesn't consider what the effect might be on the cost of power in Virginia or nationally, or the need for new generating capacity. Virginia currently has a surplus of electrical generating capacity, so excess power will likely be sold outside the state rather than being used in-state to lower prices. Local residents will be forced to live with the risks of the nuclear plant without getting the benefits.

The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over $100 billion. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

SISP Review Complete
Template = ADM-013

712

E-RIDS = ADM-03
Add = J. Cushing (JXC9)
A. Williamson (ARW1)

Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

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There is at this time no solution to the problem of nuclear waste, and constructing new reactors will only worsen that problem. The proposed Yucca Mountain repository in Nevada will not open until 2010 at the earliest, but even industry experts feel 2015 is a more realistic best-case scenario. That doesn't count the remaining scientific questions about the suitability of the site, and the half-dozen lawsuits currently pending – any of which could send the U.S. Department of Energy back to the drawing board. Even if the facility were to open as scheduled, it's not large enough to hold even the amount of waste expected to be generated by currently-operating plants. Waste from new plants will require a new repository. Meanwhile, all the highly-radioactive irradiated fuel from the plants will continue to be stored on-site.

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Aislynn Raymond
11707 Blue Smoke Trail

Reston, VA 20191

RDB Received

(508)

MAR 09 2005

From: <onewriter@ntelos.net>
To: <northanna_esp@nrc.gov>
Date: Fri, Feb 25, 2005 10:59 PM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71857

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, visionary alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Katherine Morgan
47 Belle Vista Dr
Staunton, VA 24401-8300

515P Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add = J. Cushing (JXC9)
A Williamson (ARW1)

715

RDB Received

MAR 09 2005

(509)

From: <fred-cheryl@msn.com>
To: <northanna_esp@nrc.gov>
Date: Fri, Feb 25, 2005 11:03 PM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

Fred Lavy
524 E Wolfe St
Harrisonburg, VA 22802-4822

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

(510)

MAR 09 2005

From: <tmatteson1@mindspring.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Fri, Feb 25, 2005 11:04 PM
Subject: Oppose North Anna Nuclear Reactor

12/10/04
69 FR 71854

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
ADD - J. Cushing (JXC9)
A. Williamson (ARW1)

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Tyla Matteson
4896 Burnham Rd

Richmond, VA 23234-3712

RDB Received

MAR 09 2005

(511)

From: <malbert@cstone.net>
To: <northanna_esp@nrc.gov>
Date: Fri, Feb 25, 2005 11:24 PM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Martin Albert
3381 Walnut Hill Farm
Charlottesville, VA 22911-5751

SISP Review Complete
Template = ADM-013

720

E-RIDS = ADM-03
ADD = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

(512)

MAR 09 2005

From: <arielefoster@yahoo.com>
To: <northanna_esp@nrc.gov>
Date: Fri, Feb 25, 2005 11:57 PM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

Ariele Foster
3221 Floyd Ave
Richmond, VA 23221-2903

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

(513)

MAR 09 2005

From: <dnpreif@verizon.net>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 12:16 AM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

mark reif
328 W Piccadilly St
Winchester, VA 22601-3908

SISP Review Complete
Template - ADM - 013

E-RIDS - ADM-03
Add - J. Cushing (JXC9)
A. Williamson (ARW1)

722

RDB Review

MAR 09 2005

(514)

12/10/04

69 FR 71854

From: <hawkeye21161@yahoo.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 1:32 AM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

Pat Dietch
21161 Lahore Rd
Orange, VA 22960-3804

SISP Review Complete

Template = ADM-013

723

ERIDS = ADM-03

cc = J. Cushing (JXC9)
A. Williamson (ARW1)

ROB Received

MAR 09 2005

(515)

12/10/04
69 FR 71854

From: <jim.wil@cox.net>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 2:31 AM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

James Wilcox
3442 Surrey Ln
Falls Church, VA 22042-3536

SISP Review Complete
Template = ADM-013

724

E-RIDS = ADM-03
DD = J. Cushing (JXC9)
A. Williamson (ARW1)

RBB Received

MAR 09 2005

(516)

12/10/04

69 FR #71854

From: <robb@robbsbooks.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 3:27 AM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

Robbin Knapp
1440 Birchcrest Ln
Charlottesville, VA 22911-8285

SISP Review Complete
Template = ADM-013

725

E-RIDS = ADM-03
ADD = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

MAR 09 2005

(517)

From: <joececil@juno.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 6:27 AM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

Joe Cecil
12421 Albano Rd
Barboursville, VA 22923-8723

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

MAR 09 2005

(518)

12/10/04
69 FR 71854

From: <DrDC2002@cox.net>
To: <NorthAnna_ESP@nrc.gov>
Date: Sat, Feb 26, 2005 6:42 AM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly. Lower water levels will adversely impact water-based recreational uses of the lake, for example by preventing access to boat launch ramps. Lower lake levels lead to mudflats in the back yards of homes located around the lake, and could decrease property values. The application also fails to sufficiently examine the increase in the lake temperature, which will negatively affect the striped bass population, a popular gaming fish, and other marine organisms. Waters downstream will be affected similarly.

In a time of increased terrorist threat, new nuclear power plants increase physical and economic risks to central Virginia residents, Dominion customers and shareholders, and nuclear industry employees. Al Qaeda is known to have considered nuclear power plants as a target for an attack. Terrorist threats and heightened Threat Advisory Levels (Orange and Red level) may lead to severe restrictions on public access to Lake Anna, which could impact local businesses dependent on public use of the lake. This has already happened at over a dozen lakes with nuclear plants around the country. Adding additional reactors to the North Anna facility could also increase its attractiveness as a terrorist target, increasing the frequency and likelihood of lake closures.

Safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application also doesn't consider what the effect might be on the cost of power in Virginia or nationally, or the need for new generating capacity. Virginia currently has a surplus of electrical generating capacity, so excess power will likely be sold outside the state rather than being used in-state to lower prices. Local residents will be forced to live with the risks of the nuclear plant without getting the benefits.

The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over $100 billion. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

SISP Review Complete
Template = ADM-013

727

ERIDS = ADM-03
Add = J. Cushing (JXC9)
A. Williamson (ARW1)

Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill-trained and ill-equipped. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

There is at this time no solution to the problem of nuclear waste, and constructing new reactors will only worsen that problem. The proposed Yucca Mountain repository in Nevada will not open until 2010 at the earliest, but even industry experts feel 2015 is a more realistic best-case scenario. That doesn't count the remaining scientific questions about the suitability of the site, and the half-dozen lawsuits currently pending – any of which could send the U.S. Department of Energy back to the drawing board. Even if the facility were to open as scheduled, it's not large enough to hold even the amount of waste expected to be generated by currently-operating plants. Waste from new plants will require a new repository. Meanwhile, all the highly-radioactive irradiated fuel from the plants will continue to be stored on-site.

Emergency plans for dealing with an accident or terrorist attack are inadequate, and rely on teachers, bus drivers, doctors, and other civilians to facilitate an evacuation, without taking into account the possibility of role abandonment. Studies of the Three Mile Island accident, which took place in 1979 in Pennsylvania, found that doctors and other key workers abandoned their posts up to 25 miles from the site to tend to their families or save themselves. In the case of a more severe accident, heroic actions would be required to successfully carry out an evacuation.

In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Disamodha Amarasinghe
6204 N.Military Hwy.

Norfolk, VA 23518

RDB Received

MAR 09 2005

(519)

From: <brapp70@aol.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 7:33 AM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

ROBERT RAPICE
49 Lake St
Wolcott, CT 06716-3331

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add = J. Cushing (JXC9)
A. Williamson (ARW1)

730

ROB Received

(520)

MAR 09 2005

12/10/04

69 FR 71854

From: <mhodge57@earthlink.net>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 7:34 AM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

Mary Hodge
12383 S River Rd
Woodford, VA 22580-2716

ESP Review Complete

Template = ADM-013

ERIDS = ADM-03

DD = J. Cushing (JXC9)

A. Williamson (ARW1)

731

RDB Received

(521)

MAR 09 2005

12/10/04

69 FR 71854

From: <ka11368@yahoo.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 8:04 AM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

Karla Alfano
10478 Roosevelt Ave
Corona, NY 11368-2328

SISP Review Complete

Template = ADM-013

732

DS = ADM-03

cc - J. Cushing (JXC9)
Williamson (ARW1)

RDB Received

MAR 09 2005

(522)

12/10/04
69 FR 71854

From: <cbell708@yahoo.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 8:06 AM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Carrie Bell
708 W Holly Ave
Sterling, VA 20164-4620

SISP Review
Template = ADM-013

733

ERIDS = ADM-03
add = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

(523)

MAR 09 2005

From: <editor@smother.net>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 8:42 AM
Subject: DENY Dominion's application for an Early Site Permit 12/10/04 69 FR 71857

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Jason Shawn
9237 Berkshire St
Manassas, VA 20110-6677

SISP Review Complete
Template = ADM-013

ERIDS = ADM-03
add = J. Cushing (JXC9)
A. Williamson (ARW1)

734

RDB Received

MAR 09 2005

534

From: <gemini400@juno.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 8:41 AM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Janet Collins
1607 Hilliard Rd
Richmond, VA 23228-4707

SISP Review Complete
Template = ADM-013

735

RIDS = ADM-03
Addl = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

(525)

MAR 09 2005

12/10/04

69 FR 71854

From: <kbsnyder@comcast.net>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 8:30 AM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Kelly Snyder
10498 Aspen Wood Ct
Manassas, VA 20110-2726

SISP Review Complete

Template = ADM - 013

ERIDS = ADM-03
add = J. Cushing (JxC9)
A. Williamson (ARW1)

RDB Received

MAR 09 2005

(526)

From: <kardog@flash.net>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 8:27 AM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Karin Doggett
13415 Deer Creek Rd
Ashland, VA 23005-7137

ESP Review Complete
Template = ADM-013

ERIDS = ADM-03
add - J. Cushing (JXC9)
A. Williamson (ARW1)

737

RDB Received

(527)

MAR 09 2005

From: <campbell4321@juno.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 7:07 PM
Subject: DENY Dominion's application for an Early Site Permit

12/10/04
69 FR 71854

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

Kenneth Campbell
913 Banyan Dr
Virginia Beach, VA 23462-5203

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add = J. Cushing (JXC9)
A. Williamson (ARW1)

RDB Received

(528)

MAR 09 2005

From: <bob@peckmanjazz.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Sat, Feb 26, 2005 6:32 PM
Subject: Oppose North Anna Nuclear Reactor

12/10/04
69 FR 71854

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

1. We have been making nuclear waste for over 40 years and still do not know how to get rid of it. And poisoning other people or other generations are not an option. Therefore we are putting this cost on future generations while we use the energy.

2. Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly. Lower water levels will adversely impact water-based recreational uses of the lake, for example by preventing access to boat launch ramps. Lower lake levels lead to mudflats in the back yards of homes located around the lake, and could decrease property values. The application also fails to sufficiently examine the increase in the lake temperature, which will negatively affect the striped bass population, a popular gaming fish, and other marine organisms. Waters downstream will be affected similarly.

3. In a time of increased terrorist threat, new nuclear power plants increase physical and economic risks to central Virginia residents, Dominion customers and shareholders, and nuclear industry employees. Al Qaeda is known to have considered nuclear power plants as a target for an attack. Terrorist threats and heightened Threat Advisory Levels (Orange and Red level) may lead to severe restrictions on public access to Lake Anna, which could impact local businesses dependent on public use of the lake. This has already happened at over a dozen lakes with nuclear plants around the country. Adding additional reactors to the North Anna facility could also increase its attractiveness as a terrorist target, increasing the frequency and likelihood of lake closures.

4. Safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application also doesn't consider what the effect might be on the cost of power in Virginia or nationally, or the need for new generating capacity. Virginia currently has a surplus of electrical generating capacity, so excess power will likely be sold outside the state rather than being used in-state to lower prices. Local residents will be forced to live with the risks of the nuclear plant without getting the benefits.

5. The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75

SISP Review Complete
Template = ADM-013

739

ERID = ADM-03
add = J. Cushing (JXC9)
A. Williamson (AKW1)

reactors constructed in the U.S. had a combined cost overrun of over $100 billion. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

6. Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

7. A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

8. Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill-trained and ill-equipped. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

1A. There is at this time no solution to the problem of nuclear waste, and constructing new reactors will only worsen that problem. The proposed Yucca Mountain repository in Nevada will not open until 2010 at the earliest, but even industry experts feel 2015 is a more realistic best-case scenario. That doesn't count the remaining scientific questions about the suitability of the site, and the half-dozen lawsuits currently pending – any of which could send the U.S. Department of Energy back to the drawing board. Even if the facility were to open as scheduled, it's not large enough to hold even the amount of waste expected to be generated by currently-operating plants. Waste from new plants will require a new repository. Meanwhile, all the highly-radioactive irradiated fuel from the plants will continue to be stored on-site.

Emergency plans for dealing with an accident or terrorist attack are inadequate, and rely on teachers, bus drivers, doctors, and other civilians to facilitate an evacuation, without taking into account the possibility of role abandonment. Studies of the Three Mile Island accident, which took place in 1979 in Pennsylvania, found that doctors and other key workers abandoned their posts up to 25 miles from the site to tend to their families or save themselves. In the case of a more severe accident, heroic actions would be required to successfully carry out an evacuation.

In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected

increases in energy demands over the coming years.

Bob Peckman
8131 Webster Dr
Roanoke, VA 24019

RDB Received

(529)

MAR 09 2005

12/10/04
69 FR 71854

From: <campbell4321@juno.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Sat, Feb 26, 2005 7:03 PM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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SISP Review Complete
Template = ADM-013

742

ERIDS = ADM-03
add = J. Cushing (JXC9)
A Williamson (CARW1)

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Kenneth Campbell
913 Banyan Dr.

Virginia Beach, VA 23462

RDB Received

MAR 09 2005 MAR 09 2005

(530)

12/10/04

69 FR 71854

From: <silkyj23@yahoo.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Sat, Feb 26, 2005 4:48 PM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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In a time of increased terrorist threat, new nuclear power plants increase physical and economic risks to central Virginia residents, Dominion customers and shareholders, and nuclear industry employees. Al Qaeda is known to have considered nuclear power plants as a target for an attack. Terrorist threats and heightened Threat Advisory Levels (Orange and Red level) may lead to severe restrictions on public access to Lake Anna, which could impact local businesses dependent on public use of the lake. This has already happened at over a dozen lakes with nuclear plants around the country. Adding additional reactors to the North Anna facility could also increase its attractiveness as a terrorist target, increasing the frequency and likelihood of lake closures.

Safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application also doesn't consider what the effect might be on the cost of power in Virginia or nationally, or the need for new generating capacity. Virginia currently has a surplus of electrical generating capacity, so excess power will likely be sold outside the state rather than being used in-state to lower prices. Local residents will be forced to live with the risks of the nuclear plant without getting the benefits.

The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over $100 billion. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

SISP Review Complete
Template = ADM-013

745

ERIDS = ADM-03
add - J. Cushing (JKC9)
A. Williamson (ARW1)

Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill-trained and ill-equipped. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

There is at this time no solution to the problem of nuclear waste, and constructing new reactors will only worsen that problem. The proposed Yucca Mountain repository in Nevada will not open until 2010 at the earliest, but even industry experts feel 2015 is a more realistic best-case scenario. That doesn't count the remaining scientific questions about the suitability of the site, and the half-dozen lawsuits currently pending – any of which could send the U.S. Department of Energy back to the drawing board. Even if the facility were to open as scheduled, it's not large enough to hold even the amount of waste expected to be generated by currently-operating plants. Waste from new plants will require a new repository. Meanwhile, all the highly-radioactive irradiated fuel from the plants will continue to be stored on-site.

Emergency plans for dealing with an accident or terrorist attack are inadequate, and rely on teachers, bus drivers, doctors, and other civilians to facilitate an evacuation, without taking into account the possibility of role abandonment. Studies of the Three Mile Island accident, which took place in 1979 in Pennsylvania, found that doctors and other key workers abandoned their posts up to 25 miles from the site to tend to their families or save themselves. In the case of a more severe accident, heroic actions would be required to successfully carry out an evacuation.

In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Jasmin Merida
1005 Johnson Hall

801 West Franklin Street
Richmond, VA 23220

RDB received 3/9/05

From: <kevinblythe@hotmail.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Sat, Feb 26, 2005 7:16 PM
Subject: Oppose North Anna Nuclear Reactor

(53)

12/10/04
69 FR 71854

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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E-RIDS = ADM-03
Add = J. Cushing (JXC9)
A. Williamson (AKW1)

SISP Review Complete

Template = ADM-013

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Kevin Blythe
604 Wilder Drive

Charlottesville, VA 22901

ROB received 3/9/05

(532)

From: <yvonneg@tampabay.rr.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 7:34 PM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

12/10/04
69 FR 71854

Yvonne Garcia
1314 E 17th Ave
Tampa, FL 33605-2539

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete
Template = ADM-013

RDB received
3/9/05

From: <kisytina24@aol.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Sat, Feb 26, 2005 7:43 PM
Subject: Oppose North Anna Nuclear Reactor

(533)

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

12/10/04
69 FR 71854

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E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete
Template = ADM-013

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Christina Copeland
56-B Arborhill Road

Richmond, VA 23238

RDB received
3/9/05

From: <connie.economou@veritas.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 8:00 PM
Subject: DENY Dominion's application for an Early Site Permit

534

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

Constantina Economou
1734 Seagull Ct Apt 405
Reston, VA 20194-4331

12/10/04
69 FR 71854

SISP Review. Complete
Template = ADM-013

755

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

RDB received
3/9/05

From: <anniekrochalis@swva.net>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 8:07 PM
Subject: DENY Dominion's application for an Early Site Permit

(535)

Dear US Nuclear Regulatory Comm,

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Sincerely,

Andrea B. Krochalis, MA, CAGS
9428 Patterson Dr
Bent Mountain, VA 24059-2218

12/10/04
69 FR 71854

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

ROB received
3/9/05

From: <tvybui@ucdavis.edu>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 8:11 PM
Subject: DENY Dominion's application for an Early Site Permit

(536)

Dear US Nuclear Regulatory Comm,

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Sincerely,

Thuy-Vy Bui
2804 Pole Line Rd Apt 1
Davis, CA 95616-0358

12/10/04
69 FR 71854

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

RDB received
3/9/05

From: <anancylee@yahoo.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 8:32 PM
Subject: DENY Dominion's application for an Early Site Permit

537

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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The U.S. needs to implement conservation measures that will make the country a leader in conservation technology. The upfront financial costs of mining, handling, utilizing and storing radioactive materials, and, more importantly, the longterm social and health costs for those communities interacting with these materials, make the cost of nuclear energy astronomical and, in my view, immoral. In order to strenghthen this country, we need to support conservation measures with incentives and support for research. Investments in these areas will reap immediate and longterm benefits for us all.

At the local level, safer, cheaper alternatives to new nuclear generating capacity need to be explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

12/10/04
69 FR 71854

Nancy Adamson
225 S Market St
Frederick, MD 21701-6526

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW2)

SISP Review Complete
Template = ADM-013

RDB received
3/9/05

From: <davidmitchell3@hotmail.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 9:00 PM
Subject: DENY Dominion's application for an Early Site Permit

(538)

Dear US Nuclear Regulatory Comm,

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Sincerely,

David Mitchell
11916 Purcell Rd
Lovettsville, VA 20180-1822

12/10/04
69 FR 71854

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

ROB received
3/9/05

From: <jasontrew@hotmail.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 9:02 PM
Subject: DENY Dominion's application for an Early Site Permit

(539)

Dear US Nuclear Regulatory Comm,

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Sincerely,

Jason Trew
707 Stonegate Ct
Newport News, VA 23602-9448

12/10/04
69 FR 71854

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (AREW1)

RDB received
3/9/05

(640)

From: <DavidBokel@yahoo.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Sat, Feb 26, 2005 9:08 PM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

12/10/04
69 FR 71854

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E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete
Templat = ADM-013

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A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

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There is at this time no solution to the problem of nuclear waste, and constructing new reactors will only worsen that problem. The proposed Yucca Mountain repository in Nevada will not open until 2010 at the earliest, but even industry experts feel 2015 is a more realistic best-case scenario. That doesn't count the remaining scientific questions about the suitability of the site, and the half-dozen lawsuits currently pending – any of which could send the U.S. Department of Energy back to the drawing board. Even if the facility were to open as scheduled, it's not large enough to hold even the amount of waste expected to be generated by currently-operating plants. Waste from new plants will require a new repository. Meanwhile, all the highly-radioactive irradiated fuel from the plants will continue to be stored on-site.

Emergency plans for dealing with an accident or terrorist attack are inadequate, and rely on teachers, bus drivers, doctors, and other civilians to facilitate an evacuation, without taking into account the possibility of role abandonment. Studies of the Three Mile Island accident, which took place in 1979 in Pennsylvania, found that doctors and other key workers abandoned their posts up to 25 miles from the site to tend to their families or save themselves. In the case of a more severe accident, heroic actions would be required to successfully carry out an evacuation.

In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

David Bokel
1344 Summerset Rd. N.

Gretna, VA 24557

ROB received
3/9/05

(541)

From: <lodsacurlz@yahoo.com>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 9:44 PM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Gina Hayes
10014 Raeburn Ct
Fairfax, VA 22032-2751

12/10/04
69 FR 71854

SISP Review Complete
Templat = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW2)

ROB received
3/9/05

From: <lynnadams1@cox.net>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 10:44 PM
Subject: DENY Dominion's application for an Early Site Permit

(542)

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Lynn Adams
908 Little Bay Ave
Norfolk, VA 23503-1308

12/10/04
69 FR 71854

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

RDB received
3/9/05

(543)

From: jw <jjw215@yahoo.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Sat, Feb 26, 2005 10:54 PM
Subject: No new reactors in Mineral, VA!

I am writing to OPPOSE granting an Early Site Permit (ESP) to Dominion Resources to build two new reactors at the North Anna nuclear plant in Mineral, VA. The draft Environmental Impact Statement states that construction activities permissible under the ESP may stir up heavy metals and other contaminants in the lake sediment, while details about mitigation measures are murky. Further, other effects on the lake, such as temperature increases and reduced water levels, are not fully analyzed. Finally, questions about the adequacy of current security regulations and performance are ignored, as are issues of waste generation and its safe, permanent isolation.

12/10/04
69 FR 71854

Too many questions remain unanswered and too many problems remain unsolved for the NRC to grant an ESP.

Sincerely,
Jared Wetherington
200 chester #104
Birmingham MI 48009

SISP Review Complete
Template = AOM-013

E-RIDS = AOM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

RPB received
3/9/05

(544)

From: <cqayaq@flash.net>
To: <northanna_esp@nrc.gov>
Date: Sat, Feb 26, 2005 11:27 PM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Gregory Doggett
13415 Deer Creek Rd
Ashland, VA 23005-7137

12/10/04
69 FR 71854

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

ROB received
3/9/05

From: <ricky.grubb@gmail.com>
To: <northanna_esp@nrc.gov>
Date: Sun, Feb 27, 2005 12:20 AM
Subject: DENY Dominion's application for an Early Site Permit

(545)

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Ricky Grubb
9605 Hastings Mill Dr
Glen Allen, VA 23060-3267

12/10/04
69 FR 71854

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

RDB received
3/9/05

From: <elizabethharshaw@yahoo.com>
To: <northanna_esp@nrc.gov>
Date: Sun, Feb 27, 2005 2:48 AM
Subject: DENY Dominion's application for an Early Site Permit

(546)

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Elizabeth Harsahw
1449 Bel Air Dr Apt D
Concord, CA 94521-5344

12/10/04
69 FR 71854

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

RDB received
3/9/05

(547)

From: "Misha Fredericks " <mishakachina@usadatanet.net>
To: <NorthAnna_ESP@nrc.gov>
Date: Sun, Feb 27, 2005 7:27 AM
Subject: North Anna nuclear plant

To Whom It May Concern:

I am writing to OPPOSE granting an Early Site Permit (ESP) to Dominion Resources to build two new reactors at the North Anna nuclear plant in Mineral, VA. The draft Environmental Impact Statement states that construction activities permissible under the ESP may stir up heavy metals and other contaminants in the lake sediment, while details about mitigation measures are murky. Further, other effects on the lake, such as temperature increases and reduced water levels, are not fully analyzed. Finally, questions about the adequacy of current security regulations and performance are ignored, as are issues of waste generation and its safe, permanent isolation.

Too many questions remain unanswered and too many problems remain unsolved for the NRC to grant an ESP.

Sincerely,
Misha Fredericks
222 Plutarch Rd
Highland NY 12528

12/10/04
69 FR 71854

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

ROB received
3/9/05

From: <lpoisson@aol.com>
To: <northanna_esp@nrc.gov>
Date: Sun, Feb 27, 2005 8:06 AM
Subject: DENY Dominion's application for an Early Site Permit

548

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Laura Poisson
20756 Eastlake Ct
Sterling, VA 20165-7320

12/10/04
69 FR 71854

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW2)

RDB received
3/9/05

From: <joececil@juno.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Sun, Feb 27, 2005 8:17 AM
Subject: Oppose North Anna Nuclear Reactor

549

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly. Lower water levels will adversely impact water-based recreational uses of the lake, for example by preventing access to boat launch ramps. Lower lake levels lead to mudflats in the back yards of homes located around the lake, and could decrease property values. The application also fails to sufficiently examine the increase in the lake temperature, which will negatively affect the striped bass population, a popular gaming fish, and other marine organisms. Waters downstream will be affected similarly.

12/10/04
69 FR 71854

In a time of increased terrorist threat, new nuclear power plants increase physical and economic risks to central Virginia residents, Dominion customers and shareholders, and nuclear industry employees. Al Qaeda is known to have considered nuclear power plants as a target for an attack. Terrorist threats and heightened Threat Advisory Levels (Orange and Red level) may lead to severe restrictions on public access to Lake Anna, which could impact local businesses dependent on public use of the lake. This has already happened at over a dozen lakes with nuclear plants around the country. Adding additional reactors to the North Anna facility could also increase its attractiveness as a terrorist target, increasing the frequency and likelihood of lake closures.

Safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application also doesn't consider what the effect might be on the cost of power in Virginia or nationally, or the need for new generating capacity. Virginia currently has a surplus of electrical generating capacity, so excess power will likely be sold outside the state rather than being used in-state to lower prices. Local residents will be forced to live with the risks of the nuclear plant without getting the benefits.

The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over $100 billion. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW2)

SISP Review Complete
Template = ADM-013

Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill-trained and ill-equipped. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

There is at this time no solution to the problem of nuclear waste, and constructing new reactors will only worsen that problem. The proposed Yucca Mountain repository in Nevada will not open until 2010 at the earliest, but even industry experts feel 2015 is a more realistic best-case scenario. That doesn't count the remaining scientific questions about the suitability of the site, and the half-dozen lawsuits currently pending – any of which could send the U.S. Department of Energy back to the drawing board. Even if the facility were to open as scheduled, it's not large enough to hold even the amount of waste expected to be generated by currently-operating plants. Waste from new plants will require a new repository. Meanwhile, all the highly-radioactive irradiated fuel from the plants will continue to be stored on-site.

Emergency plans for dealing with an accident or terrorist attack are inadequate, and rely on teachers, bus drivers, doctors, and other civilians to facilitate an evacuation, without taking into account the possibility of role abandonment. Studies of the Three Mile Island accident, which took place in 1979 in Pennsylvania, found that doctors and other key workers abandoned their posts up to 25 miles from the site to tend to their families or save themselves. In the case of a more severe accident, heroic actions would be required to successfully carry out an evacuation.

In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Joe McCloskey
P.O. Box 124

12421 Albano Road
Barboursville, VA 22923

RDB received
3/9/05

From: <stonergm@gmail.com>
To: <northanna_esp@nrc.gov>
Date: Sun, Feb 27, 2005 8:39 AM
Subject: DENY Dominion's application for an Early Site Permit

(550)

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Gary Stoner
8704 Shadowlake Way
Springfield, VA 22153-2140

12/10/04
69 FR 71854

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

RDB received
3/9/05

(551)

From: <lucy.lu@comcast.net>
To: <northanna_esp@nrc.gov>
Date: Sun, Feb 27, 2005 9:24 AM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

Roberto Perez
1519 N Point Dr Apt 302
Reston, VA 20194-2117

12/10/04
69 FR 71854

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW7)

RDB received
3/9/05

552

From: <heron@rica.net>
To: <northanna_esp@nrc.gov>
Date: Sun, Feb 27, 2005 9:30 AM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

Sarah Knorr
PO Box 976
Verona, VA 24482-0976

12/10/04
69 FR 71854

SISP Review Complete
Templat = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (AEW1)

777

ROB received
3/9/05

(553)

From: <j63s2003@yahoo.com>
To: <northanna_esp@nrc.gov>
Date: Sun, Feb 27, 2005 10:07 AM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

John Sexson
4305 NE Hoit Dr
Lees Summit, MO 64064-3122

12/10/04
69 FR 71854

SISP Review Complete
Template = ADM-013

778

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

RDB received
3/9/05

From: <hjfrog@juno.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Sun, Feb 27, 2005 10:17 AM
Subject: Oppose North Anna Nuclear Reactor

554

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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12/10/04
69 FR 71854

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E-RIDS = AOM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete
Template = AOM-013

Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Heather Martin
2509 Semmes Avenue

Richmond, VA 23225

RDB received
3/9/05

555

From: <onlysloan@yahoo.com>
To: <northanna_esp@nrc.gov>
Date: Sun, Feb 27, 2005 11:00 AM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Richard Sloan
928 Ballylinn Rd
Virginia Beach, VA 23464-1634

12/10/04
69 FR 71854

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

RDB received
3/9/05

From: <eknoerle@yahoo.com>
To: <northanna_esp@nrc.gov>
Date: Sun, Feb 27, 2005 11:03 AM
Subject: DENY Dominion's application for an Early Site Permit

(55C)

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

Elizabeth Barger
100 Luna Park Dr
Apt. 275
Alexandria, VA 22305-3168

12/10/04
69 FR 71854

SISP Review Complete

Template = ADM-013

E-RIDS= ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

ROB received
3/9/05

From: <sarah_gillespie@hotmail.com>
To: <northanna_esp@nrc.gov>
Date: Sun, Feb 27, 2005 11:07 AM
Subject: DENY Dominion's application for an Early Site Permit

557

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

Sarah Gillespie
PO Box 336
Saltville, VA 24370-0336

12/10/04
69 FR 71854

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (AREW1)

RDB received
3/9/05

From: <mooneyshaun@yahoo.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Sun, Feb 27, 2005 12:00 PM
Subject: Oppose North Anna Nuclear Reactor

(558)

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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12/10/04
69FR 71854

In a time of increased terrorist threat, new nuclear power plants increase physical and economic risks to central Virginia residents, Dominion customers and shareholders, and nuclear industry employees. Al Qaeda is known to have considered nuclear power plants as a target for an attack. Terrorist threats and heightened Threat Advisory Levels (Orange and Red level) may lead to severe restrictions on public access to Lake Anna, which could impact local businesses dependent on public use of the lake. This has already happened at over a dozen lakes with nuclear plants around the country. Adding additional reactors to the North Anna facility could also increase its attractiveness as a terrorist target, increasing the frequency and likelihood of lake closures.

Safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application also doesn't consider what the effect might be on the cost of power in Virginia or nationally, or the need for new generating capacity. Virginia currently has a surplus of electrical generating capacity, so excess power will likely be sold outside the state rather than being used in-state to lower prices. Local residents will be forced to live with the risks of the nuclear plant without getting the benefits.

The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over $100 billion. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

E-RIDS = ADM-03

SISP Review Complete

Template = ADM-013

Add J. Cushing (JXC9)
A. Williamson (ARW1)

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A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill-trained and ill-equipped. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

There is at this time no solution to the problem of nuclear waste, and constructing new reactors will only worsen that problem. The proposed Yucca Mountain repository in Nevada will not open until 2010 at the earliest, but even industry experts feel 2015 is a more realistic best-case scenario. That doesn't count the remaining scientific questions about the suitability of the site, and the half-dozen lawsuits currently pending – any of which could send the U.S. Department of Energy back to the drawing board. Even if the facility were to open as scheduled, it's not large enough to hold even the amount of waste expected to be generated by currently-operating plants. Waste from new plants will require a new repository. Meanwhile, all the highly-radioactive irradiated fuel from the plants will continue to be stored on-site.

Emergency plans for dealing with an accident or terrorist attack are inadequate, and rely on teachers, bus drivers, doctors, and other civilians to facilitate an evacuation, without taking into account the possibility of role abandonment. Studies of the Three Mile Island accident, which took place in 1979 in Pennsylvania, found that doctors and other key workers abandoned their posts up to 25 miles from the site to tend to their families or save themselves. In the case of a more severe accident, heroic actions would be required to successfully carry out an evacuation.

In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Shaun Mooney
58 Somerset Drive

Weyers Cave, VA 24486

ROB received
3/9/05

From: <mooneyshaun@yahoo.com>
To: <northanna_esp@nrc.gov>
Date: Sun, Feb 27, 2005 12:01 PM
Subject: DENY Dominion's application for an Early Site Permit

559

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

12/10/04
69 FR 71854

Shaun Mooney
58 Somerset Dr
Weyers Cave, VA 24486-2442

SISP Review Complete
Templat = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

788

RDB received
3/9/05

From: <dbodnaruk@comcast.net>
To: <northanna_esp@nrc.gov>
Date: Sun, Feb 27, 2005 1:41 PM
Subject: DENY Dominion's application for an Early Site Permit

(560)

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

12/10/04
69 FR 71854

Dan bodnaruk
5050 Seagrass Dr
Venice, FL 34293-4297

SISP Review Complete
Template : ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

789

ROB received
3/9/05

561

From: <ljfues@hotmail.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Sun, Feb 27, 2005 2:02 PM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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12/10/04
69FR71854

In a time of increased terrorist threat, new nuclear power plants increase physical and economic risks to central Virginia residents, Dominion customers and shareholders, and nuclear industry employees. Al Qaeda is known to have considered nuclear power plants as a target for an attack. Terrorist threats and heightened Threat Advisory Levels (Orange and Red level) may lead to severe restrictions on public access to Lake Anna, which could impact local businesses dependent on public use of the lake. This has already happened at over a dozen lakes with nuclear plants around the country. Adding additional reactors to the North Anna facility could also increase its attractiveness as a terrorist target, increasing the frequency and likelihood of lake closures.

Safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application also doesn't consider what the effect might be on the cost of power in Virginia or nationally, or the need for new generating capacity. Virginia currently has a surplus of electrical generating capacity, so excess power will likely be sold outside the state rather than being used in-state to lower prices. Local residents will be forced to live with the risks of the nuclear plant without getting the benefits.

The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over $100 billion. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

E-RIDS = ADM-03

SISP Review Complete

Add J. Cushing (JXC9)
A. Williamson (ARW1)

Templat = ADM-013

Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill-trained and ill-equipped. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lisa Fues
9a W Caton Ave

Alexandria, VA 22301

RDB received
3/9/05

(562)

From: <mike@swva.net>
To: <NorthAnna_ESP@nrc.gov>
Date: Sun, Feb 27, 2005 2:08 PM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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12/10/04
69 FR 71854

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E-RIDS = ADM-03

Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete

Template = ADM-013

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Diane Clark
P.O. Box 64

Woolwine, VA 24185

RDB received
3/9/05

(563)

From: <lorah@oldway.net>
To: <northanna_esp@nrc.gov>
Date: Sun, Feb 27, 2005 2:22 PM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

Lorah East
43348 Wayside Cir
Ashburn, VA 20147-4629

12/10/04
69 FR 71854

SISP Review Complete
Template - ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW2)

ROB received
3/9/05

(564)

From: <Pienkowsk1@aol.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Sun, Feb 27, 2005 2:27 PM
Subject: Comments on DEIS

Please see the attached pdf file with my comments.
Thank you.

D Pienkowski

12/10/04
69 FR 71854

SISP Review Complete
Templat = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

February 21, 2005

Chief Rules and Directives Branch
Division of Administrative Services
Office of Administration Mailstop T-6D59
U.S. Nuclear Regulatory Commission
Washington DC 20555-0001

Re: North Anna ESP Permit and DEIS

Thank you for the opportunity to comment.

I have worked as an environmental analyst and educator. The science behind many sections of the DEIS seems fuzzy. The conclusion of SMALL impacts doesn't logically flow from the discussion and often is unsubstantiated. The policy analysis specifically with regard to regional socio-economic measures is very weak. I request that the DEIS be prepared in accordance with the intent of NEPA and re-issued.

In particular, the treatments of the following areas are inadequate:

1. Roads and transportation – there are already real problems in the region and this project will only make them worse (especially during construction or god-forbid if an evacuation is required). Projects of traffic and impacts generated within the 20-year window of the ESP are not addressed (VTRANS 2025).
2. Life safety – there are no hospitals nearby Lake Anna and none in the adjacent counties of Spotsylvania or Louisa.
3. Water impacts – a defensible water budget is required for any reasonable modeling to be done and for any results to be meaningful.
4. Safety and Terrorism – this is clearly a socioeconomic issue that should be addressed in an EIS given the proximity to large population centers including Washington, D. C.
5. Nuclear waste storage and disposal – we don't seem to have any permanent options yet for existing nuclear waste stockpiles.
6. Government subsidies to the nuclear industry – how much will these kilowatt-hours really cost?

Please re-do this document and give the public the data it needs to make an informed decision on this project.

Sincerely,

Donna Pienkowski
6147 Hickory Ridge Road
Spotsylvania, VA 22553

ROB received
3/9/05

From: <stasiyork@hotmail.com>
To: <northanna_esp@nrc.gov>
Date: Sun, Feb 27, 2005 2:33 PM
Subject: DENY Dominion's application for an Early Site Permit

(565)

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

Stasi York
8031 Burrundie Dr
Richmond, VA 23225-1973

12/10/04
69 FR 71854

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (AREW2)

799

ROB received
3/9/05

(566)

From: <joel7687@hotmail.com>
To: <northanna_esp@nrc.gov>
Date: Sun, Feb 27, 2005 2:35 PM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

Joel Cox
1701 Taynton Cir NW
Kennesaw, GA 30152-7631

12/10/04
69 FR 71854

SISP Review Complete
Template = AOM-013

E-RIDS = AOM-03
Add J. Cushing (JXC9)
A. Williamson (AKW1)

800

ROB received
3/9/05

(567)

From: <oxdrover2001@yahoo.com>
To: <northanna_esp@nrc.gov>
Date: Sun, Feb 27, 2005 2:39 PM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Susan Johnson
6319 31st St N
Arlington, VA 22207-1181

12/10/04
69 FR 71854

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

801

ROB received
3/9/05

From: <bobissie@earthlink.net>
To: <NorthAnna_ESP@nrc.gov>
Date: Sun, Feb 27, 2005 2:50 PM
Subject: Oppose North Anna Nuclear Reactor

(568)

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

12/10/04
69 FR 71854

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly. Lower water levels will adversely impact water-based recreational uses of the lake, for example by preventing access to boat launch ramps. Lower lake levels lead to mudflats in the back yards of homes located around the lake, and could decrease property values. The application also fails to sufficiently examine the increase in the lake temperature, which will negatively affect the striped bass population, a popular gaming fish, and other marine organisms. Waters downstream will be affected similarly.

In a time of increased terrorist threat, new nuclear power plants increase physical and economic risks to central Virginia residents, Dominion customers and shareholders, and nuclear industry employees. Al Qaeda is known to have considered nuclear power plants as a target for an attack. Terrorist threats and heightened Threat Advisory Levels (Orange and Red level) may lead to severe restrictions on public access to Lake Anna, which could impact local businesses dependent on public use of the lake. This has already happened at over a dozen lakes with nuclear plants around the country. Adding additional reactors to the North Anna facility could also increase its attractiveness as a terrorist target, increasing the frequency and likelihood of lake closures.

Safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application also doesn't consider what the effect might be on the cost of power in Virginia or nationally, or the need for new generating capacity. Virginia currently has a surplus of electrical generating capacity, so excess power will likely be sold outside the state rather than being used in-state to lower prices. Local residents will be forced to live with the risks of the nuclear plant without getting the benefits.

The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over $100 billion. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete
Templat = ADM-013

Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill-trained and ill-equipped. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

There is at this time no solution to the problem of nuclear waste, and constructing new reactors will only worsen that problem. The proposed Yucca Mountain repository in Nevada will not open until 2010 at the earliest, but even industry experts feel 2015 is a more realistic best-case scenario. That doesn't count the remaining scientific questions about the suitability of the site, and the half-dozen lawsuits currently pending – any of which could send the U.S. Department of Energy back to the drawing board. Even if the facility were to open as scheduled, it's not large enough to hold even the amount of waste expected to be generated by currently-operating plants. Waste from new plants will require a new repository. Meanwhile, all the highly-radioactive irradiated fuel from the plants will continue to be stored on-site.

Emergency plans for dealing with an accident or terrorist attack are inadequate, and rely on teachers, bus drivers, doctors, and other civilians to facilitate an evacuation, without taking into account the possibility of role abandonment. Studies of the Three Mile Island accident, which took place in 1979 in Pennsylvania, found that doctors and other key workers abandoned their posts up to 25 miles from the site to tend to their families or save themselves. In the case of a more severe accident, heroic actions would be required to successfully carry out an evacuation.

In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Chrissie Lozano
1716 Floyd Ave

Richmond, VA 23220

ROB received
3/9/05

From: <realpok@msn.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Sun, Feb 27, 2005 3:15 PM
Subject: Oppose North Anna Nuclear Reactor

(569)

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete
Template = ADM-013

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Jamie King
CSU 1321

P.O. Box 8793
Williamsburg, VA 23186-1321

RDB received
3/9/05

570

From: <cricketgorka@earthlink.net>
To: <northanna_esp@nrc.gov>
Date: Sun, Feb 27, 2005 3:35 PM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.
Besides the social, environmental and economic concerns for this reactor are the following: 1. There are no operating experience records for this generation of reactor. From my previous extended work in following reactor function and "excursions", there can be problems that small scale operation cannot predict. 2) Up to four reactors in one site will invite sabotage and terrorism. Surely, this is not a good strategy.
Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Mary Gorka
2603 Rockfish Valley Hwy
Po Box 215
Nellysford, VA 22958-2308

12/10/04
69 FR 71854

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JRC9)
A. Williamson (AEW1)

808

RDB received
3/9/05

(571)

From: <csk1949@yahoo.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Sun, Feb 27, 2005 3:42 PM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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12/10/04
69 FR 71854

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Safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application also doesn't consider what the effect might be on the cost of power in Virginia or nationally, or the need for new generating capacity. Virginia currently has a surplus of electrical generating capacity, so excess power will likely be sold outside the state rather than being used in-state to lower prices. Local residents will be forced to live with the risks of the nuclear plant without getting the benefits.

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E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete
Templat = ADM-013

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Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill-trained and ill-equipped. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

charles kern

rt 1 box 113-B
new canton, va 223123

ROB received
3/9/05

(572)

From: <jim214comrad@netzero.com>
To: <northanna_esp@nrc.gov>
Date: Sun, Feb 27, 2005 3:57 PM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

JAMES CONROY
214 9th St
Hicksville, NY 11801-5446

12/10/04
69 FR 71854

SISP Review Complete
Template - ADM-013

E-RIDS= ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

RDB received
3/9/05

From: "Kirk Butler" <its4kirk@earthlink.net>
To: <NorthAnna_ESP@nrc.gov>
Date: Sun, Feb 27, 2005 4:24 PM
Subject: RE:Nuke Waste Dump

573

>
>
> Chief, Rules and Directives Branch
> Division of Administrative Services
> Office of Administration
> Mailstop T-6D59
> U.S. Nuclear Regulatory Commission
> Washington, DC 20555-0001
>
> Either way, get them in by Tuesday, March 1! Sample comments:
>
> To Whom It May Concern:
>
> I am writing to OPPOSE granting an Early Site Permit (ESP) to Dominion
> Resources to build two new reactors at the North Anna nuclear plant in
> Mineral, VA. The draft Environmental Impact Statement states that
> construction activities permissible under the ESP may stir up heavy
> metals and other contaminants in the lake sediment, while details about
> mitigation measures are murky. Further, other effects on the lake, such
> as temperature increases and reduced water levels, are not fully
> analyzed. Finally, questions about the adequacy of current security
> regulations and performance are ignored, as are issues of waste
> generation and its safe, permanent isolation.
>
> Too many questions remain unanswered and too many problems remain
> unsolved for the NRC to grant an ESP.
>
> Sincerely,
>
>Kirk Butler

12/10/04
69 FR 71854

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

RDB received
3/9/05

574

From: <probyn.gregory@econres.com>
To: <northanna_esp@nrc.gov>
Date: Sun, Feb 27, 2005 4:59 PM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

probyn gregory
1766 N Las Palmas Ave
Los Angeles, CA 90028-4810

12/10/04
69 FR 71854

SISP Review Complete
Templat = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

814

RDB received
3/9/05

(575)

From: <nc7655@earthlink.net>
To: <NorthAnna_ESP@nrc.gov>
Date: Sun, Feb 27, 2005 5:07 PM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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12/10/04
69 FR 71854

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E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete
Templat = ADM-013

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Nancy Carpenter

7173 Kirtley Trail
Culpeper, Va 22701

RDB received
3/9/05

(576)

From: <ivymain@cox.net>
To: <northanna_esp@nrc.gov>
Date: Sun, Feb 27, 2005 6:16 PM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Dominion Power should be encouraging conservation and passive solar construction methods. They should also be exploring wind power.

Sincerely,

Ivy Main
1331 Merchant Lane
McLean, VA 22101

12/10/04
69 FR 71854

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

RDB received
3/9/05

577

From: <wajamala@yahoo.com>
To: <northanna_esp@nrc.gov>
Date: Sun, Feb 27, 2005 6:43 PM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

We are not ready to safely use nuclear power. The human race is simply not responsible enough as yet. We are, however, ready for technologies of effeciency. How about those standards for new air conditioning and heat pump effeciency that President Bush removed early in his first term. They should be reinstated. For that matter, how about the Kyoto accords? Our current policies actually seem to encourage more demand for energy, when it should be encouraging more effecient ways to use what generating capacity we already have. We live in a finite world, and simply cannot continue to grow industry ad infinitum.

Sincerely,

mark lackey
1880 Iron Bridge Rd
Stuart, VA 24171-3221

12/10/04
69 FR 71854

SISP Review Complete
Templat : ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

ROB received
3/9/05

578

From: <lsenoj@yahoo.com>
To: <northanna_esp@nrc.gov>
Date: Sun, Feb 27, 2005 7:31 PM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Lauren Jones
2248 Hawksbill Rd
Mc Gaheysville, VA 22840-3207

12/10/04
69 FR 71854

SISP Review Complete
Templat = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

ROB received
3/9/05

(579)

From: <jg_howard@yahoo.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Sun, Feb 27, 2005 7:42 PM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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12/10/04
69 FR 71854

In a time of increased terrorist threat, new nuclear power plants increase physical and economic risks to central Virginia residents, Dominion customers and shareholders, and nuclear industry employees. Al Qaeda is known to have considered nuclear power plants as a target for an attack. Terrorist threats and heightened Threat Advisory Levels (Orange and Red level) may lead to severe restrictions on public access to Lake Anna, which could impact local businesses dependent on public use of the lake. This has already happened at over a dozen lakes with nuclear plants around the country. Adding additional reactors to the North Anna facility could also increase its attractiveness as a terrorist target, increasing the frequency and likelihood of lake closures.

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The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over $100 billion. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

E-RIDS: AOM-03

SISP Review Complete

Add J. Cushing (JXC9)
A. Williamson (ARW1)

Template : AOM-013

Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill-trained and ill-equipped. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

There is at this time no solution to the problem of nuclear waste, and constructing new reactors will only worsen that problem. The proposed Yucca Mountain repository in Nevada will not open until 2010 at the earliest, but even industry experts feel 2015 is a more realistic best-case scenario. That doesn't count the remaining scientific questions about the suitability of the site, and the half-dozen lawsuits currently pending – any of which could send the U.S. Department of Energy back to the drawing board. Even if the facility were to open as scheduled, it's not large enough to hold even the amount of waste expected to be generated by currently-operating plants. Waste from new plants will require a new repository. Meanwhile, all the highly-radioactive irradiated fuel from the plants will continue to be stored on-site.

Emergency plans for dealing with an accident or terrorist attack are inadequate, and rely on teachers, bus drivers, doctors, and other civilians to facilitate an evacuation, without taking into account the possibility of role abandonment. Studies of the Three Mile Island accident, which took place in 1979 in Pennsylvania, found that doctors and other key workers abandoned their posts up to 25 miles from the site to tend to their families or save themselves. In the case of a more severe accident, heroic actions would be required to successfully carry out an evacuation.

In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Jay Howard
P.O. Box 501

Keysville, VA 23947

ROB received
3/9/05

(580)

From: <SBLOSSOM@WEGNET.COM>
To: <NorthAnna_ESP@nrc.gov>
Date: Sun, Feb 27, 2005 8:11 PM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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12/10/04
69 FR 71854

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E-RIDS: AOM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete
Templat = AOM-013

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Scott Blossom
406 Capitol Landing Rd

Williamsburg, VA 23185

RDB received
3/9/05

(581)

From: <Hollymd1976@aol.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Sun, Feb 27, 2005 8:49 PM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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12/10/04
69 FR 71854

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E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete
Template - ADM-013

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Holly Hendrickson

10021 Melody Lane
Hagerstown, Md 21740

ROB received
3/9/05

From: <jenniferd@firstva.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Sun, Feb 27, 2005 9:31 PM
Subject: Oppose North Anna Nuclear Reactor

582

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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12/10/04
69 FR 71854

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E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete
Templat = ADM-013

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Jennifer Davis
1210 Belleview Ave.

Charlottesville, VA 22901

RDB received
3/9/05

(583)

From: Gene Smith <smith.geneandjane@verizon.net>
To: <NorthAnna_ESP@nrc.gov>
Date: Sun, Feb 27, 2005 9:40 PM
Subject: North Anna

You have correctly assessed the environmental impact. The recently conducted public hearings, while an important part of the process, are just that: one source of public input. You correctly applied your approved process and scientific principles and judgment. The conclusion in support of the use of the site is appropriate. Additional steps in the future licensing of a unit or units will build on your work. Your job is complete and stands on its own merit! It serves as an important foundation for continued safe use of the property. The public is well served by your action and conclusions.

Gene Smith
804-360-5402

12/10/04
69 FR 71854

SISP Review Complete
Templat = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

833

RDB received
3/9/05

(584)

From: <rcannon100@yahoo.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Sun, Feb 27, 2005 10:11 PM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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12/10/04
69FR 71854

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E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete
Template = ADM-013

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Robert Cannon
2358 N Vernon Street

Arlington, VA 22207

ROB received
3/9/05

585

From: <devanmalore@yahoo.com>
To: <northanna_esp@nrc.gov>
Date: Sun, Feb 27, 2005 10:26 PM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.
Please do not begin this nuclear problem again, it is too poweful an issue to take lightly!!!!!

Sincerely,

Devan Malore
PO 1252
Lexington, VA 24450

12/10/04
69 FR 71854

E-RIDS = AOM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete
Templat = AOM-013

ROB received
3/9/05

(586)

From: <jamaph31@yahoo.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Sun, Feb 27, 2005 10:50 PM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly. Lower water levels will adversely impact water-based recreational uses of the lake, for example by preventing access to boat launch ramps. Lower lake levels lead to mudflats in the back yards of homes located around the lake, and could decrease property values. The application also fails to sufficiently examine the increase in the lake temperature, which will negatively affect the striped bass population, a popular gaming fish, and other marine organisms. Waters downstream will be affected similarly.

12/10/04
69 FR 71854

In a time of increased terrorist threat, new nuclear power plants increase physical and economic risks to central Virginia residents, Dominion customers and shareholders, and nuclear industry employees. Al Qaeda is known to have considered nuclear power plants as a target for an attack. Terrorist threats and heightened Threat Advisory Levels (Orange and Red level) may lead to severe restrictions on public access to Lake Anna, which could impact local businesses dependent on public use of the lake. This has already happened at over a dozen lakes with nuclear plants around the country. Adding additional reactors to the North Anna facility could also increase its attractiveness as a terrorist target, increasing the frequency and likelihood of lake closures.

Safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application also doesn't consider what the effect might be on the cost of power in Virginia or nationally, or the need for new generating capacity. Virginia currently has a surplus of electrical generating capacity, so excess power will likely be sold outside the state rather than being used in-state to lower prices. Local residents will be forced to live with the risks of the nuclear plant without getting the benefits.

The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over $100 billion. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

E-RIDS= ADM-03
Add J. Cushing (JXC9)
A. Williamson (AEW1)

SISP Review Complete
Template = ADM-013

Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill-trained and ill-equipped. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

There is at this time no solution to the problem of nuclear waste, and constructing new reactors will only worsen that problem. The proposed Yucca Mountain repository in Nevada will not open until 2010 at the earliest, but even industry experts feel 2015 is a more realistic best-case scenario. That doesn't count the remaining scientific questions about the suitability of the site, and the half-dozen lawsuits currently pending – any of which could send the U.S. Department of Energy back to the drawing board. Even if the facility were to open as scheduled, it's not large enough to hold even the amount of waste expected to be generated by currently-operating plants. Waste from new plants will require a new repository. Meanwhile, all the highly-radioactive irradiated fuel from the plants will continue to be stored on-site.

Emergency plans for dealing with an accident or terrorist attack are inadequate, and rely on teachers, bus drivers, doctors, and other civilians to facilitate an evacuation, without taking into account the possibility of role abandonment. Studies of the Three Mile Island accident, which took place in 1979 in Pennsylvania, found that doctors and other key workers abandoned their posts up to 25 miles from the site to tend to their families or save themselves. In the case of a more severe accident, heroic actions would be required to successfully carry out an evacuation.

In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Kristie Hersey

10803 Gladwynne Rd.
Jacksonville, Fl 32218

ROB received
3/9/05

(587)

From: <kenlangslow@yahoo.com>
To: <northanna_esp@nrc.gov>
Date: Sun, Feb 27, 2005 10:55 PM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

12/10/04
69 FR 71854

Ken Langslow
2317A Hatton St
Virginia Beach, VA 23451-1409

SISP Review Complete
Templat = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW2)

ROB received
3/9/05

588

From: <tamonyjl@mail1.vcu.edu>
To: <NorthAnna_ESP@nrc.gov>
Date: Sun, Feb 27, 2005 10:56 PM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

12/10/04
69 FR 71854

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E-RIDS = AOM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete
Template = AOM-013

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Jennifer Bryant
2058 Alldever Dr.

Maidens, VA 23102

RDB received
3/9/05

From: "acericardo@mindspring.com" <acericardo@mindspring.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 2:38 AM
Subject: Submission of Comments on North Anna ESP DEIS

589

I attach comments (in MS Word format) on the North Anna DEIS on behalf of the Virginia Chapter of the Sierra Club.

Richard H. Ball
Energy Issues Chair
4022 Downing St.
Annandale, VA 22003
703-256-9309

acericardo@mindspring.com
EarthLink Revolves Around You.

12/10/04
69 FR 71854

SISP Review Complete
Template = ADM-013

E-RIDS= ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

SIERRA CLUB
FOUNDED 1892
VIRGINIA CHAPTER

February 27, 2005

Sierra Club Virginia Chapter Comments on Draft EIS for an Early Site Permit (ESP) at the North Anna ESP Site[1]

OVERVIEW

The Virginia Chapter of the Sierra Club adopted a resolution opposing approval of additional reactors at Lake Anna or certification of that site as suitable for new units. That resolution, attached hereto, cites several reasons for opposing additional reactors at Lake Anna.

This DEIS has some serious deficiencies. It does not adequately discuss, analyze, or acknowledge important and potentially important environmental impacts. It also does not include discussion of the consequences of storing additional radioactive spent fuel wastes at the site from addition of new reactors: in effect, North Anna is being turned into a semi-permanent high level waste repository.[2] Because of the deficiencies of the DEIS and the potential for serious environmental consequences from the project, the Virginia Chapter of the Sierra Club disagrees with the staff's preliminary recommendation that the ESP should be issued.

These comments concentrate on the issue of impact of reactor operation on basin water resources and the potential environmental consequences of decreased water releases from Lake Anna. However, there are a number of other site-specific and generic issues regarding the proposed addition of reactor units that are important. They are briefly summarized in the next section.

My overall conclusion on the water resource consumption issue is that this watershed is already overtaxed by the existing reactor operations and cannot accommodate additional water consumption by even one new reactor that uses once-through cooling or withdrawals for evaporative cooling towers. Neither the DEIS nor the proponent's Environmental Report (ER) deals adequately with the impact of project consumption on ecological and recreational values or on downstream water use, in spite of issues raised by the Virginia Department of Environmental Quality (VDEQ). No adequate justification is provided in the DEIS or the ER for numerous deviations from the terms of the NPDES requirements for minimum releases of water from Lake Anna, for the conclusions about the degree of environmental impact during droughts, in the DEIS, or the conclusion of the DEIS that no mitigation is required. The discussion about water impacts in the DEIS appears to be perfunctory and the conclusions are not consistent with the projected water flows and the issues raised by the VDEQ.

Another related issue is the approach in the DEIS of postponing several key site-related issues to the COL process. We believe that violates the spirit, if not the letter of the NRC's staged process for approval of new reactors. It makes no sense to certify the suitability of a site before it is clear whether there are viable and satisfactory solutions for issues such as storage of spent fuel and provision of water for cooling. That could lead to abuses of the staged process in which excessive momentum is developed favoring final approval irrespective of whether there is

[1] A brief summary was presented by Richard Ball at the Public meeting on February 17, 2005.
[2] We also were unable to find any discussion of spent fuel storage impacts in the portions of the SER available online.

strong evidence that alternatives and solutions exist for issues left unresolved during the ESP process. The current ESP applications for North Anna and several other reactors constitutes the first real test of how the NRC will implement the new staged process and whether it intends to protect the public interest or subvert the process to avoid or obfuscate important issues.

SUMMARY OF OTHER IMPORTANT ISSUES

Other site-specific and generic issues regarding the proposed addition of reactors units include:

- **Impact of additional cooling on Lake Anna:** Increased lake temperature threatens the striped bass population in the lake. Lower water levels would adversely impact recreational activities in the lake. Yet, any analysis to determine "operational practices and procedures" that might minimize adverse impacts" is deferred until the COL application.
- **High-level waste management:** The Draft EIS fails to evaluate the environmental impacts and security threat of indefinitely storing the additional irradiated fuel that will be generated by the proposed reactors onsite. In view of problems with the Yucca Mountain repository, there is no guarantee if or when another permanent repository ever will be available. Lake Anna would become a semi-permanent, if not permanent high level waste repository.
- **Impact on Wetlands.** Existing wetlands, streams, and woodlands on the North Anna Power Station (NAPS) site may be adversely affected by construction activities for the proposed Units 3 and 4 (draft EIS, page 4-2, lines 20-23).
- **Need for Power:** Virginia currently has an excess electric generation capacity for its in-state needs but continues to approve new fossil-fueled generating units that primarily will serve out-of-state customers while increasing air pollution, water resource consumption and transmission line impacts in Virginia. Neither the State of Virginia nor any of its major power generating companies has undertaken substantial initiatives to encourage or provide safe, clean renewable energy resources or to promote energy conservation.

While we will not address those issues in these comments, that does not imply that they are unimportant. Those issues have been raised and will be discussed by other members of the Sierra Club and by other citizens and environmental organizations.

DISCUSSION OF THE WATER ISSUE

Can the watershed of Lake Anna support cooling for additional reactors? To put the issue in perspective, Table 5.2-1 of the ER indicates that there is more than sufficient water on an annual average basis to meet the minimum release requirement (40 cfs) and supply four units. But the net water available varies greatly with the season and year-to-year variations in rainfall. Lake Anna does not have nearly enough storage capacity to even out those variations while maintaining the lake level within limits required for reactor cooling intake, recreation, fishing and other objectives. It is clear from historical data and the model analysis in the ER, as presented in Table 5.2-3 that the NPDES permit requirement of 40 cfs is not achieved 43.9% of the time and that frequency is projected to increase to 52.4% with the addition of Unit 3. Furthermore, even the minimum value allowed during drought conditions (20 cfs) is not achieved 5.3% of the time and that frequency is projected to increase to 11.8% with the addition of Unit 3. The ER and DEIS discuss various alternatives for cooling proposed Units 3 and 4, including:

- Use of wet cooling towers might reduce thermal impacts on Lake Anna but would increase the amount of water loss if the Lake is the source of the cooling water withdrawals.
- Altering the intake structures for Units 1 and 2 and lowering the allowable minimum lake level would permit incrementally greater effective storage at the expense of greater impacts on recreation and fish populations.
- Providing an alternative source of water for wet cooling towers would eliminate the water problem, but the source of such water is not identified. It seems likely that an alternative water supply, if any, would not be available nearby in the critical summer months or drought periods without constructing an additional large reservoir to store the water that might be available during wet periods.
- If dry cooling is feasible for Unit 4, why is it not equally feasible for Unit 3?

It thus appears that construction of even one new unit at Lake Anna is likely to result in serious deficits in releases of water to the North Anna River, contrary to the terms of the NPDES permit. Indeed, even current operations result in deficits that often fall below the minimum 20 cfs allowed and quite frequently fall below the 40 cfs value. (It seems very peculiar to regard conditions that occur 43.9% of the time as "drought".) Neither the proponent's ER nor the DEIS discuss in detail the impacts on the North Anna River and the Pamunkey River that are likely to occur from increased periods of below-minimum releases. While lower stretches are fed by other creeks, such as the South Anna River, it seems likely that during drought periods those other sources of water also will experience low flows. There is no discussion of the combined effects of low flows in those other sources. The DEIS completely fails to provide a convincing case for its conclusion that the impact of those reductions in release will be SMALL. If low flows are not a problem, why did the DEQ establish those requirements in its NPDES permit?

The Virginia Department of Environmental Quality (VDEQ) raised substantial issues regarding aquatic impacts in Lake Anna and streams downstream from the Lake(DEIS Appendix F, especially pages F-34 though F-61). The VDEQ states that "current minimum flows would be rate as poor to degraded ..." and that "...the consumptive loss from the watershed by an additional 39 cfs, would create nearly perennial conditions of severe degradation every fall."[3] However, the arguments made in the DEIS about water impacts in section 5.3.2 simply dismiss the importance of low flow impacts such as those that would occur from Unit #3 without any cogent reasons, amounting essentially to arm waving rather than incisive analysis. The last paragraph in that section does not logically follow from the facts presented, especially the conclusions that impacts during severe droughts would only be moderate and that no mitigation is required. We believe it would be highly inappropriate and arguably deceptive to proceed to issue an early site permit while leaving all those issues insufficiently treated and apparently unresolved until the COL process. The VDEQ also requested that the ESP not be issued until the issues of aquatic impact are resolved.

In simple terms, the DEIS appears largely to sweep key water issues under the rug.

Submitted on behalf of the Virginia Chapter by Dr. Richard H. Ball, Energy Issues Chair, Virginia Chapter of the Sierra Club

[3] On p. F-38 in Letter from Ellie Irons (VDEQ) to Pamela Faggert (Dominion Power Co.).

SIERRA CLUB
FOUNDED 1892
VIRGINIA CHAPTER

Position on New Nuclear Reactors at North Anna

The Sierra Club Virginia Chapter opposes approval of additional nuclear reactors at the North Anna site, or certification of that site as suitable for new units, for the following reasons:

1) When it is shown that additional electric generation capacity is needed, the Sierra Club Virginia Chapter believes that new electric generating units preferentially should be sited at existing power plant sites or industrialized areas in order to minimize impacts on unspoiled areas, provided such existing sites can satisfactorily sustain the additional impacts on land, air and water resources. However, the North Anna site has serious problems as a site for additional reactors, particularly with regard to adequacy of water resources to support additional thermal power plant cooling operations. Based on the proponent's own data and analysis, additional loss of lake water associated with either once-through lake cooling or withdrawals for evaporative cooling towers would seriously compromise the ability to maintain lake levels within current operating targets and will likely result in significant decreases in releases of water to downstream aquatic habitats, especially in periods of low flow and drought conditions. Existing units already result in releases that fall below the minimum 40 cps specified in the NPDES permit. Larger excursions in lake levels will adversely affect fish propagation and aesthetic and recreational uses of Lake Anna. Further decreases in downstream releases would adversely affect the hydrology and ecology of streams in the York River Watershed, including the North Anna River and the Pamunkey River. No power additions or certification of site suitability should be approved that could result in further reductions in the minimum actual releases from Lake Anna.

2) Virginia currently has an excess electric generation capacity for its in-state needs but continues to approve new fossil-fueled generating units that primarily will serve out-of-state customers while increasing air pollution, water resource consumption and transmission line impacts in Virginia. Neither the State of Virginia nor any of its major power generating companies has undertaken substantial initiatives to encourage or provide safe, clean renewable energy resources or to adequately promote energy conservation. The Sierra Club Virginia Chapter believes that the time has come for the state government, major utilities, and power production companies to establish aggressive policies, actions, and quantitative targets for energy conservation and clean renewable energy production to the maximum extent feasible before approval of further projects for polluting fossil-fueled or unsafe nuclear power production in Virginia.

3) As a matter of national policy, the Sierra Club opposes licensing, construction and operation of nuclear reactors utilizing the fission process pending:[4]

   a) Development of adequate national and global policies to curb energy over-use and unnecessary economic growth.

[4] *Based on resolutions adopted by the Board of Directors, December 12-13, 1974 and May 5-6. 1979.*

b) Resolution of the significant safety problems inherent in reactor operation, disposal of spent fuels, and possible diversion of nuclear materials capable of use in weapons manufacture.

c) Establishment of adequate regulatory machinery to guarantee adherence to the foregoing conditions. The above resolution does not apply to research reactors.

The problems of waste disposal, materials security and reactor safety remain unresolved. No permanent repository for reactor waste has yet been licensed and the Yucca Mountain repository has serious deficiencies for long-term safe containment, so there is no satisfactory solution in sight for waste disposal within the foreseeable future. Meanwhile, wastes from existing reactors continue to accumulate on-site in temporary storage at North Anna and other US reactors.

ROB received
3/9/05

590

From: <ec0009@netscpae.net>
To: <northanna_esp@nrc.gov>
Date: Mon, Feb 28, 2005 6:05 AM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Andrew Presgraves
13420 Stream Farm Ln
Leesburg, VA 20176-5472

12/10/04
69 FR 71854

SISP Review Complete
Templat = AOM-013

E-RIDS = AOM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

RDB received
3/9/05

From: <tmroach@lynchburg.net>
To: <northanna_esp@nrc.gov>
Date: Mon, Feb 28, 2005 6:42 AM
Subject: DENY Dominion's application for an Early Site Permit

591

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

Margaret Roach
1564 PINEBLUFF DR
LYNCHBURG, VA 24503-4936

12/10/04
69 FR 71854

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

852

RDB received
3/9/05

From: <srirama90@yahoo.com>
To: <northanna_esp@nrc.gov>
Date: Mon, Feb 28, 2005 8:21 AM
Subject: DENY Dominion's application for an Early Site Permit

(592)

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

Kevin Smith
6967 Villa Del Rey Ct
Springfield, VA 22150-3067

12/10/04
69 FR 71854

SISP Review Complete
Templat = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

ROB received
3/9/05

From: <dbstewart@earthlink.net>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 8:42 AM
Subject: Oppose North Anna Nuclear Reactor

593

Dear Chief Lesar

I oppose any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. Nuclear energy is unsafe and it does have considerable lifecycle polluting emissions. It is also extraordinarily expensive and has cost U.S. taxpayers many billions of dollars. Efficiency measures can save businesses and other ratepayers considerable money while foregoing the expense of building many new power plants. Market-based programs for Energy Star products and green building should be developed as part of our energy portfolio. These programs would render unsafe and expensive proposals such as this one unnecessary. Thank you for your consideration.

Douglas Stewart
10822 Maple Street
Fairfax, VA 22030

12/10/04
69 FR 71854

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

ROB received
3/9/05

(594)

From: gross.larry@gmail.com
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 8:44 AM
Subject: Comments: Draft Environmental Impact Statement for an Early Site Permit (ESP) at the North Anna ESP Site (NUREG-1811)

Please accept the following comments on behalf of the Battlefields Sierra Group in Fredericksburg, Va.

February 28, 2005

12/10/04
69 FR 71854

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration, Mailstop T-6D59
U.S. Nuclear Regulatory Commission,
Washington, DC 20555-0001

Re: North Anna ESP Permit and DEIS

Thank you for the opportunity to comment on the DEIS.

There appear to be three major flaws with the process and the project and we are hopeful that the NRC will go back and do the appropriate research and reporting, perhaps via a revised Draft EIS that meets the intent of the National Environmental Policy Act.

It appears that information about this proposed action is incomplete at this point in time and that the public has not been provided with important information that they would need if they were to be able to make relevant comments. This would be the same information that the agency would use to make an informed decision.

The three flaws are as follows:

FIRST, the ESP process takes away citizens rights to get a complete look at the proposed action. The ESP EIS only looks at certain things, the Safety Report (which was barely made available to the public) looks at others, the COL will look at others. This is not the way the National Environmental Policy Act and its implementing regulations require the system to work. Citizens and government reviewers need to be able to get a look at the big picture of a proposed action in order make informed judgments and provide input.

For example:

- Exclusion of considerations like terrorism and nuclear material transport are major flaws in the process.
- Furthermore, by creating a twenty year window for the action, the ESP process makes conclusions about the Site and its environment, that are likely not to be true soon after the ESP is approved. The window is too large given the narrow amount of data that is being provided to the public and interested local governments.

SECOND, the EIS is seriously deficient in a number of areas especially with regard to socioeconomics and the human environment. There is a rather long list of important information that is absent ranging from questions about impacts to striped bass to basic info about the power

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete
Template = ADM-013

plant's cost, security, traffic, and plans for waste disposal. Information about how much of the cost will be borne by Dominion and how much by taxpayers is absent. Just a few examples:

- No mention is made of the impacts of the project on property values in the Lake Anna Area.
- No mention is made of the impacts of the increased warm water in the Lake on ground fog and the traffic impacts associated therewith.
- A cost estimate for the facility is not included and thus one can't do any cost-benefit analysis for its capital and operating impacts.
- The EIS basically says that all the road problems will be fixed to support transport of the huge number of construction personnel but there is no connection to the current reality in Virginia that there is limited or no money for roads. The VTRANS 2025 report is an unbiased view of the future of traffic and roads in the area and it predicts almost total gridlock along the I-95, US1 corridor within the life of the proposed project.
- The EIS is not a true NEPA document – it does not include mitigation steps and clear discussion of irreversible and irretrievable impacts.
- The DEIS says that emergency plans are okay in part because there are two hospitals in Spotsylvania. THERE ARE NO HOSPITALS IN SPOTSYLVANIA! Mary Washington Hospital in Fredericksburg is the primary hospital serving this area and it is getting stretched thin.
- The list of alternatives did not include life extension of the existing two plants or retirement of those plants.

Furthermore, the DEIS does not inform the public that private insurance will not provide total coverage for this kind of facility and that, in fact, taxpayer funds are used to self insure. Is the public informed that much of the cost of security and waste disposal is also paid for not by investors but through their tax dollars? Are we willing to provide the information to the public so they can comment on it? The NRC can waiver provisions to provide this information but it cannot waiver the legitimate rights of the public to know this information especially if you invite them to comment on the proposal.

THIRD, the project itself has real problems including inadequate cooling water, ability to support construction personnel, and emergency evacuation. Dominion's concession to use dry cooling for Unit 4 is indicative of the water limitations. We mention above the road situation relative to the movement of 5,000 construction personnel – what would happen if an evacuation was required of ten or twenty times that many people? Local infrastructure can't support this project.

Nuclear power is promoted to the public as safe, clean and cheap and yet information that would enable them to understand the specifics of that claim is not provided in this proposal and that information is key if the public is to understand the merits of this proposal especially as compared to other power-generation choices such as coal, solar and wind.

I urge you to produce as complete a record as you can and suggest that only then do we have a legitimate process to receive public input on this proposal. We thus request that the NRC issue a supplemental DEIS and defer the decision making process until the record is complete.

Sincerely,

Larry Gross – Co Chair
Jim Lynch – Co Chair
For the Battlefields Sierra Group

COPIES:

Thomas E. Capps, CEO
Dominion Resources
120 Tredegar Street
Richmond, VA 23219

Nils J. Diaz, Chairman
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Michael Town
Sierra Club Virginia Chapter

Larry Gross
P.O. Box 37
Spotsylvania, Va. 22553
540-786-6843
always use this email -> lgross@pobox.com

CC: Jim Lynch <jplynch@crosslink.net>, Aviv Goldsmith <PrecursorS@aol.com>, Larry Gross <lgross@pobox.com>

ROB received
3/9/05

From: <andrew.town@capitalone.com>
To: <northanna_esp@nrc.gov>
Date: Mon, Feb 28, 2005 8:49 AM
Subject: DENY Dominion's application for an Early Site Permit

595

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Andrew Town
9820 Swansea Rd
Richmond, VA 23236-4623

12/10/04
69 FR 71854

SISP Review Complete
Template = AOM-013

E-RIDS: AOM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

RDB received
3/9/05

(596)

From: <morrisa2@vcu.edu>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 8:52 AM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

12/10/04
69 FR 71854

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In a time of increased terrorist threat, new nuclear power plants increase physical and economic risks to central Virginia residents, Dominion customers and shareholders, and nuclear industry employees. Al Qaeda is known to have considered nuclear power plants as a target for an attack. Terrorist threats and heightened Threat Advisory Levels (Orange and Red level) may lead to severe restrictions on public access to Lake Anna, which could impact local businesses dependent on public use of the lake. This has already happened at over a dozen lakes with nuclear plants around the country. Adding additional reactors to the North Anna facility could also increase its attractiveness as a terrorist target, increasing the frequency and likelihood of lake closures.

Safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application also doesn't consider what the effect might be on the cost of power in Virginia or nationally, or the need for new generating capacity. Virginia currently has a surplus of electrical generating capacity, so excess power will likely be sold outside the state rather than being used in-state to lower prices. Local residents will be forced to live with the risks of the nuclear plant without getting the benefits.

The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over $100 billion. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

E-RIDS = ADM-03

SISP Review Complete

Add J. Cushing (JXC9)
A. Williamson (ARW1)

Templat - ADM-013

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Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill-trained and ill-equipped. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

There is at this time no solution to the problem of nuclear waste, and constructing new reactors will only worsen that problem. The proposed Yucca Mountain repository in Nevada will not open until 2010 at the earliest, but even industry experts feel 2015 is a more realistic best-case scenario. That doesn't count the remaining scientific questions about the suitability of the site, and the half-dozen lawsuits currently pending – any of which could send the U.S. Department of Energy back to the drawing board. Even if the facility were to open as scheduled, it's not large enough to hold even the amount of waste expected to be generated by currently-operating plants. Waste from new plants will require a new repository. Meanwhile, all the highly-radioactive irradiated fuel from the plants will continue to be stored on-site.

Emergency plans for dealing with an accident or terrorist attack are inadequate, and rely on teachers, bus drivers, doctors, and other civilians to facilitate an evacuation, without taking into account the possibility of role abandonment. Studies of the Three Mile Island accident, which took place in 1979 in Pennsylvania, found that doctors and other key workers abandoned their posts up to 25 miles from the site to tend to their families or save themselves. In the case of a more severe accident, heroic actions would be required to successfully carry out an evacuation.

In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Allison Morris
18 W Broad St #2

Richmond, VA 23220

ROB received
3/9/05

(597)

From: <jhnnywalkr@hotmail.com>
To: <northanna_esp@nrc.gov>
Date: Mon, Feb 28, 2005 8:59 AM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

John Shea
6020 Forrest Hollow Ln
Springfield, VA 22152-1417

12/10/04
69 FR 71854

SISP Review Complete
Templat = Adm-013

E-RIDS = Adm-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

862

RDB received
3/9/05

598

From: <aliciahans@yahoo.com>
To: <northanna_esp@nrc.gov>
Date: Mon, Feb 28, 2005 9:04 AM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

12/10/04
69 FR 71854

Alicia Hans
1734 W Abingdon Dr Apt 202
Alexandria, VA 22314-1060

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

863

ROB received
3/9/05

From: <ragmtnbettie@gct21.net>
To: <northanna_esp@nrc.gov>
Date: Mon, Feb 28, 2005 9:28 AM
Subject: DENY Dominion's application for an Early Site Permit

599

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

12/10/04
69 FR 71854

James Parker
Rag Mountain Estate
General Delivery
Syria, VA 22743

SISP Review Complete
Templat = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

ROB received
3/9/05

(600)

From: <kkatsos@comcast.net>
To: <northanna_esp@nrc.gov>
Date: Mon, Feb 28, 2005 9:34 AM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

Kat Katsos
7319 Ford Ave
Mechanicsville, VA 23111-1317

12/10/04
69 FR 71854

SISP Review Complete
Templat = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

RDB received 3/9/05

From: <lizehrich@hotmail.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 9:40 AM
Subject: Oppose North Anna Nuclear Reactor

(601)

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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12/10/04
69 FR 71854

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SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

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A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill-trained and ill-equipped. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Liz Ehrich
5 Spring Court

Fredericksburg, VA 22405

RDB received
3/9/05

From: <roamruth@650dialup.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 9:40 AM
Subject: Oppose North Anna Nuclear Reactor

(602)

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

12/10/04
69 FR 71854

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E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete
Templat = ADM-013

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Ruth KAUFMAN
208 EDGEWOOD

Staunton, VA 24401

RDB received
3/9/05

603

From: <anjua@medscape.com>
To: <northanna_esp@nrc.gov>
Date: Mon, Feb 28, 2005 9:48 AM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

Anjali Athavale
1114 E. N Stafford St
Arlington, VA 22201

12/10/04
69 FR 71854

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

ROB received
3/9/05

From: <beth.lawrence@eds.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 9:51 AM
Subject: Oppose North Anna Nuclear Reactor

(604)

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

12/10/04
69 FR 71854

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In a time of increased terrorist threat, new nuclear power plants increase physical and economic risks to central Virginia residents, Dominion customers and shareholders, and nuclear industry employees. Al Qaeda is known to have considered nuclear power plants as a target for an attack. Terrorist threats and heightened Threat Advisory Levels (Orange and Red level) may lead to severe restrictions on public access to Lake Anna, which could impact local businesses dependent on public use of the lake. This has already happened at over a dozen lakes with nuclear plants around the country. Adding additional reactors to the North Anna facility could also increase its attractiveness as a terrorist target, increasing the frequency and likelihood of lake closures.

Safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application also doesn't consider what the effect might be on the cost of power in Virginia or nationally, or the need for new generating capacity. Virginia currently has a surplus of electrical generating capacity, so excess power will likely be sold outside the state rather than being used in-state to lower prices. Local residents will be forced to live with the risks of the nuclear plant without getting the benefits.

The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over $100 billion. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (AREW1)

SISP Review Complete
Templat = ADM-013

Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill-trained and ill-equipped. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

There is at this time no solution to the problem of nuclear waste, and constructing new reactors will only worsen that problem. The proposed Yucca Mountain repository in Nevada will not open until 2010 at the earliest, but even industry experts feel 2015 is a more realistic best-case scenario. That doesn't count the remaining scientific questions about the suitability of the site, and the half-dozen lawsuits currently pending – any of which could send the U.S. Department of Energy back to the drawing board. Even if the facility were to open as scheduled, it's not large enough to hold even the amount of waste expected to be generated by currently-operating plants. Waste from new plants will require a new repository. Meanwhile, all the highly-radioactive irradiated fuel from the plants will continue to be stored on-site.

Emergency plans for dealing with an accident or terrorist attack are inadequate, and rely on teachers, bus drivers, doctors, and other civilians to facilitate an evacuation, without taking into account the possibility of role abandonment. Studies of the Three Mile Island accident, which took place in 1979 in Pennsylvania, found that doctors and other key workers abandoned their posts up to 25 miles from the site to tend to their families or save themselves. In the case of a more severe accident, heroic actions would be required to successfully carry out an evacuation.

In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Mary Lawrence
6550 Cypress Point Rd

Alexandria, VA 22312

ROB received
3/9/05

(605)

12/10/04
69 FR 71854

From: <dawsonj@mindspring.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 10:05 AM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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E-RIDS: AOM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete
Templat = AOM-013

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Teresa Dawson
7022 Claybird Lane

Mechanicsville, VA 23111

RDB received
3/9/05

From: <maya@onr.navy.mil>
To: <northanna_esp@nrc.gov>
Date: Mon, Feb 28, 2005 10:07 AM
Subject: DENY Dominion's application for an Early Site Permit

(606)

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable; and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Annette May
3514 S Stafford St
Arlington, VA 22206-1812

12/10/04
69 FR 71854

SISP Review Complete
Template = Adm-013

E-RIDS = Adm-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

RDB received
3/9/05

From: <tshank@rev.net>
To: <northanna_esp@nrc.gov>
Date: Mon, Feb 28, 2005 10:08 AM
Subject: DENY Dominion's application for an Early Site Permit

(607)

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

tim shank
836 Hugh Ave
Roanoke, VA 24019-4336

12/10/04
69 FR 71854

SISP Review Complete
Template = Adm-013

E-RIDS = Adm-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

880

RDB received 3/9/05.

(608)

12/10/04
69 FR 71854

From: <pcemakr@juno.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 10:22 AM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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E-RIDS = ADM-03

SISP Review Complete

Add J. Cushing (JXC9)

Template = ADM-013

A. Williamson (ARW1)

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Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill-trained and ill-equipped. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Ken Willis
1401 Confederate Ave.

Richmond, VA 23227

ROB received
3/9/05

(609)

From: <isis_worshiper@yahoo.com>
To: <northanna_esp@nrc.gov>
Date: Mon, Feb 28, 2005 10:25 AM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Robyn Erickson
2 Wallace St Apt 6
Waterbury, VT 05676-1716

12/10/04
69FR 71854

SISP Review Complete
Templat = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (AEW1)

884

RDB received
3/9/05.

From: <progressive2674@sbcglobal.net>
To: <northanna_esp@nrc.gov>
Date: Mon, Feb 28, 2005 10:31 AM
Subject: DENY Dominion's application for an Early Site Permit

(610)

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

Brenda Wiley
604 Opening Hill Rd
Madison, CT 06443-1741

12/10/04
69 FR 71854

SISP Review Complete
Templat: Aom-013

885

E-RIDS: Aom-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

RDB received
3/9/05

From: <kathy.day@capitalone.com>
To: <northanna_esp@nrc.gov>
Date: Mon, Feb 28, 2005 10:33 AM
Subject: DENY Dominion's application for an Early Site Permit

(611)

Dear US Nuclear Regulatory Comm,

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Sincerely,

Kathy Day
4408 Leonard Pkwy
Richmond, VA 23221-1808

12/10/04
69 FR 71854

SISP Review Complete
Templat = ADM-013

E-RIDS = ADM-03
J. Cushing (JXC9)
A. Williamson (AREW1)

886

ROB received
3/9/05

From: <margaretbreslau@hotmail.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 10:34 AM
Subject: Oppose North Anna Nuclear Reactor

(612)

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

12/10/04
69 FR 71854

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E-RIDS= ADM-03

SISP Review Complete

Add J. Cushing (JXC9)

Template = ADM-013

A. Williamson (AREW1)

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Margaret Breslau
601 Turner St.

Blacskburg, VA 24060

ROB received
3/9/05

From: <jshematek119@yahoo.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 10:35 AM
Subject: Oppose North Anna Nuclear Reactor

(613)

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

12/10/04
69 FR 71854

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E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete
Template = ADM-013

Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill-trained and ill-equipped. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

There is at this time no solution to the problem of nuclear waste, and constructing new reactors will only worsen that problem. The proposed Yucca Mountain repository in Nevada will not open until 2010 at the earliest, but even industry experts feel 2015 is a more realistic best-case scenario. That doesn't count the remaining scientific questions about the suitability of the site, and the half-dozen lawsuits currently pending – any of which could send the U.S. Department of Energy back to the drawing board. Even if the facility were to open as scheduled, it's not large enough to hold even the amount of waste expected to be generated by currently-operating plants. Waste from new plants will require a new repository. Meanwhile, all the highly-radioactive irradiated fuel from the plants will continue to be stored on-site.

Emergency plans for dealing with an accident or terrorist attack are inadequate, and rely on teachers, bus drivers, doctors, and other civilians to facilitate an evacuation, without taking into account the possibility of role abandonment. Studies of the Three Mile Island accident, which took place in 1979 in Pennsylvania, found that doctors and other key workers abandoned their posts up to 25 miles from the site to tend to their families or save themselves. In the case of a more severe accident, heroic actions would be required to successfully carry out an evacuation.

In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Judith Shematek
119 Chisman Landing

Seaford, VA 23696

ROB received
3/9/05

(614)

From: PIPER MARTIN <pipermartin23@yahoo.com>
To: <northanna_esp@nrc.gov>
Date: Mon, Feb 28, 2005 10:42 AM
Subject: Message to the NRC from Rena Martin-Errick

My name is Rena Martin-Errick.
I live in Louisa County in Virginia.
I'm 81 years old, and I hope to continue to lead a healthy,productive life.

I care TREMENDOUSLY - on both a personal level AND on a global level - about nuclear power. This is my message to the NRC.

12/10/04
69 FR 71854

I don't believe you when you say that the issue of terrorist attacks on the plant will be "addressed" in another part of this process. After Sept 11, the Nuclear
Energy Institute commissioned an expert study. That study found that existing reactors in the US were "safe" from that 9-11 type of attack.
BUT the "experts" assumed these large jets would slow down by over 300 mph before hitting the reactor, exactly the opposite behavior of the actual 9-11 attackers.

The NRC staff salaries ARE PAID BY THE NUCLEAR INDUSTRY.

On February 16, Yahoo News reported (and I quote from

the news article):
"Speaking with one voice, President Bush's top intelligence and military officials said Wednesday that terrorists are regrouping for possible new strikes against the United States."

No, I don't believe you when you say you have the ability to protect the public and insure our safety.

I don't believe you when you say the issue of nuclear waste will NOT be an on-going and increasing problem. NONE of the waste from these new reactors will go to Yucca Mountain, which is already full beyond its capacity - with already existing waste in the US.
There is NO other permanent high level waste dump site
even being considered at this point, much less built
--
and this process takes decades to complete.
So the highly toxic and dangerously radioactive waste

from North Anna will STAY IN OUR COUNTY at an ever increasing risk of disaster.

I don't believe you when you say the water at Lake

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW2)

SISP Review Complete
Template = ADM-013

Anna
will be sufficient to cool two additional reactors.
We have already seen the water level of the
lake drop dangerously low during recent draughts.
Additional reactors can only worsen this problem,
INCREASING THE CHANCE OF AN ACCIDENT AT THE PLANT.

The NRC has a long history of supporting and
promoting
nuclear power even while the twin ONGOING and
UNRESOLVED
problems of waste removal AND threat of terrorist
attacks
keep on increasing.

So, no, I don't believe you when you say you have the

ability to protect the public and insure our safety.

With rising tensions and increasing threats of new
terrorist attacks inside the United States, it seems
a
VERY poor time to be thinking of building more
reactors at North Anna.

There's still more that I'm worried about. These
proposed
new reactors HAVE NEVER BEEN BUILT BEFORE ANYWHERE IN
THE
WORLD. I do not like being a Guinea Pig for untested

reactor designs. For one thing, the chances for
FINANCIAL disaster in this case are quite high,
likely changing our current electricity rates to very
high rates.

A greaater worry is the prospect of an environmental
and health disaster. Even IF everything goes right
with the construction, testing and operation of this
untried new design, there will be increasing routine
releases of radiation into the lake and air, as well
as
dramatically increased amounts of nuclear waste
traffic
from the plant. I must wonder, how many MORE people
would have attended the meeting if Dominion were
already shipping tons of radioactive waste on roads
in Mineral and Louisa, close to, or right past our
own homes.

The problem of nuclear waste TRANSPORT from N. Anna
ACTUALLY gets worse each day, since the nuclear waste

steadily increases and MUST sooner or later be
somehow
removed.

This proposal to expand the plant by two reactors will double this currently hidden problem and increase the risk to everyone in this room, their children, and many generations beyond. DON'T make it worse than it already is.

Too many lies for too many years have been told to us for too long, by both the NRC and Dominion Resources, about nuclear power. I can not start believing you now.

So my simple message is just this: DON'T ISSUE THIS PERMIT.

Then I'll be able to sincerely say thank you.

Rena Martin-Errick
Louisa, Virginia

CC: <pi232001@yahoo.com>, "Piper M." <pi232004@yahoo.com>

ROB received
3/9/05

(615)

12/10/04
69 FR 71854

From: <joe123@forpresident.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 11:15 AM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly. Lower water levels will adversely impact water-based recreational uses of the lake, for example by preventing access to boat launch ramps. Lower lake levels lead to mudflats in the back yards of homes located around the lake, and could decrease property values. The application also fails to sufficiently examine the increase in the lake temperature, which will negatively affect the striped bass population, a popular gaming fish, and other marine organisms. Waters downstream will be affected similarly.

In a time of increased terrorist threat, new nuclear power plants increase physical and economic risks to central Virginia residents, Dominion customers and shareholders, and nuclear industry employees. Al Qaeda is known to have considered nuclear power plants as a target for an attack. Terrorist threats and heightened Threat Advisory Levels (Orange and Red level) may lead to severe restrictions on public access to Lake Anna, which could impact local businesses dependent on public use of the lake. This has already happened at over a dozen lakes with nuclear plants around the country. Adding additional reactors to the North Anna facility could also increase its attractiveness as a terrorist target, increasing the frequency and likelihood of lake closures.

Safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application also doesn't consider what the effect might be on the cost of power in Virginia or nationally, or the need for new generating capacity. Virginia currently has a surplus of electrical generating capacity, so excess power will likely be sold outside the state rather than being used in-state to lower prices. Local residents will be forced to live with the risks of the nuclear plant without getting the benefits.

The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over $100 billion. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

E-RIDS = AOM-03
Add J. Cushing (JXC9)
A. Williamson (AWW1)

SISP Review Complete
Template = AOM-013

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Joshua Rellick
CSU 2242

P.O. Box 8793
Williamsburg, VA 23186

RDB received 3/9/05.

From: <eric@musictoday.com>
To: <northanna_esp@nrc.gov>
Date: Mon, Feb 28, 2005 11:32 AM
Subject: DENY Dominion's application for an Early Site Permit

(616)

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity. Please compel Dominion to use the money they would have used for building these reactors to research safer methods to handle the byproducts of current production. Instead of expanding our nuclear presence, we should explore, properly fund and mandate renewable energy sources. While this would ultimately take the profit motive out of the hands of large energy companies, it would make for a better world for future generations.

Sincerely,

12/10/04
69 FR 71854

Eric Borgersen
1155 Brookhill Ave
Charlottesville, VA 22902-8769

SISP Review Complete
Template - ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

899

RDB received
3/9/05

From: Matthew and Sarah Freeman <mscraigfreeman@yahoo.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 11:49 AM
Subject: North Anna ESP

(617)

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration
Mailstop T-6D59
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Comments on Draft NUREG-1811

12/10/04
69 FR 71854

To Whom It May Concern:

I am writing to OPPOSE granting an Early Site Permit (ESP) to Dominion Resources to build two new reactors at the North Anna nuclear plant in Mineral, VA. The draft Environmental Impact Statement states that there will be moderate impacts on the quality of water in Lake Anna during drought years, and small to moderate impacts during normal years. This is unacceptable to me, a resident of Richmond and recreational user of Lake Anna. I am concerned that a drop in water level will adversly affect fish populations, including striped bass as well as their striped bass eggs and larvae. Extra stocking is not an attractive option as it doesn't consider the unsuitability of a warmer lake for the fish population, and only slightly mitigates the effects of a negative environmental change.

I am also concerned that drops in water quality will adversley affect the Chesapeake Bay, a concern that is not given enough consideration in the Draft EIS. As the states in the Bay's watershed are giving increased attention to the health of the bay, it would be a grave mistake to further compromise the health of tributaries in the watershed. Decreased water flows, increased temperature, and negative effects on vegetation and fish populations are all likely to have negative impacts on the bay. These effects must be studied in detail and we must be assured that the Bay's health will not be further impacted.

Too many questions remain unanswered and too many problems remain unsolved for the NRC to grant an ESP.

Sincerely,
Matthew Freeman

Do you Yahoo!?
Yahoo! Mail - Easier than ever with enhanced search. Learn more.

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete
Templat - ADM-013

900

http://info.mail.yahoo.com/mail_250

RDB received
3/9/05

From: <joseph@moonstar.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 11:59 AM
Subject: Oppose North Anna Nuclear Reactor

(618)

Dear Chief Lesar

I am a U.S. Navy Veteran. Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

12/10/04
69 FR 71854

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly. Lower water levels will adversely impact water-based recreational uses of the lake, for example by preventing access to boat launch ramps. Lower lake levels lead to mudflats in the back yards of homes located around the lake, and could decrease property values. The application also fails to sufficiently examine the increase in the lake temperature, which will negatively affect the striped bass population, a popular gaming fish, and other marine organisms. Waters downstream will be affected similarly.

In a time of increased terrorist threat, new nuclear power plants increase physical and economic risks to central Virginia residents, Dominion customers and shareholders, and nuclear industry employees. Al Qaeda is known to have considered nuclear power plants as a target for an attack. Terrorist threats and heightened Threat Advisory Levels (Orange and Red level) may lead to severe restrictions on public access to Lake Anna, which could impact local businesses dependent on public use of the lake. This has already happened at over a dozen lakes with nuclear plants around the country. Adding additional reactors to the North Anna facility could also increase its attractiveness as a terrorist target, increasing the frequency and likelihood of lake closures.

Safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application also doesn't consider what the effect might be on the cost of power in Virginia or nationally, or the need for new generating capacity. Virginia currently has a surplus of electrical generating capacity, so excess power will likely be sold outside the state rather than being used in-state to lower prices. Local residents will be forced to live with the risks of the nuclear plant without getting the benefits.

The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over $100 billion. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (AKW1)

SISP Review Complete
Template: ADM-013

Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill-trained and ill-equipped. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Joseph Anthony

Rt 1 Box 2975
Buckingham, VA 23921

RDB received
3/9/05

From: <archardl@chesterfield.gov>
To: <northanna_esp@nrc.gov>
Date: Mon, Feb 28, 2005 12:00 PM
Subject: DENY Dominion's application for an Early Site Permit

(619)

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Please listen to the public! We do not want any additional nuclear power plants!

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Lee Archard
911 Pine Ridge Rd
Richmond, VA 23226-3046

12/10/04
69 FR 71854

SISP Review Complete
Template = ADM-013

E-RIDS: ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

905

RDB received
3/9/05.

From: <kmorgan@hunton.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 12:13 PM
Subject: Oppose North Anna Nuclear Reactor

(620)

12/10/04
69 FR 71854

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (AEW1)

SISP Review Complete
Templat = ADM-013

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Katherine Morgan
3408 Park Avenue

Apt. 4
Richmond, VA 23221

ROB received
3/9/05

From: <cinoor@aol.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 12:13 PM
Subject: Oppose North Anna Nuclear Reactor

(621)

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

12/10/04
69 FR 71854

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E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (AREI)

SISP Review Complete
Template = ADM-013

Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill-trained and ill-equipped. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

There is at this time no solution to the problem of nuclear waste, and constructing new reactors will only worsen that problem. The proposed Yucca Mountain repository in Nevada will not open until 2010 at the earliest, but even industry experts feel 2015 is a more realistic best-case scenario. That doesn't count the remaining scientific questions about the suitability of the site, and the half-dozen lawsuits currently pending – any of which could send the U.S. Department of Energy back to the drawing board. Even if the facility were to open as scheduled, it's not large enough to hold even the amount of waste expected to be generated by currently-operating plants. Waste from new plants will require a new repository. Meanwhile, all the highly-radioactive irradiated fuel from the plants will continue to be stored on-site.

Emergency plans for dealing with an accident or terrorist attack are inadequate, and rely on teachers, bus drivers, doctors, and other civilians to facilitate an evacuation, without taking into account the possibility of role abandonment. Studies of the Three Mile Island accident, which took place in 1979 in Pennsylvania, found that doctors and other key workers abandoned their posts up to 25 miles from the site to tend to their families or save themselves. In the case of a more severe accident, heroic actions would be required to successfully carry out an evacuation.

In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

jem stone
3361 lake View Drive

Falls church, VA 22041

RDB received
3/9/05

(622)

From: <kalukin_99@yahoo.com>
To: <northanna_esp@nrc.gov>
Date: Mon, Feb 28, 2005 12:14 PM
Subject: DENY Dominion's application for an Early Site Permit

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Andrew Kalukin
1114 N Stafford St Apt E
Arlington, VA 22201-4656

12/10/04
69 FR 71854

SISP Review Complete
Templat = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

ROB received
3/9/05

From: <wagoner@fas.harvard.edu>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 12:42 PM
Subject: Environmental impact of Dominion Power at Lake Anna

(623)

Dear Nuclear Regulatory Commission,

I am strongly opposed to the approval of Dominion Power's plan to build new reactors at Lake Anna.

Among the most salient environmental problems:

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If the approval is granted, water levels will undoubtedly decrease in the lake and in the the North Anna river. This will harm fish and underwater vegetation. Because the North Anna river is a part of the Chesapeake Bay watershed, any problems in this river will result in problems in the Bay.

Secondly, Lake Anna will experience an increase in temperature, as its water would be used to cool the new plant. This will have an adverse affect on fish populations.

Should Virginia experience any sustained droughts, the effects on the lake would be more severe. Water levels can be expected to drop and temperatures rise even further. This will also affect the lake's recreational appeal and value for the state's tourism industry.

Further construction near Lake Anna will disturb the environment, possibly destroying streams and wetlands and polluting the environment with contaminats and heavy metals.

Please deny Dominion Power's permit application and preserve the environment. New nuclear reactors are not needed and would adversely impact the region.

Thank you for your consideration,

Bryan L. Wagoner
Harvard University

E-RIDS= AOM-03
Add J. Cushing (JXC9)
A. Williamson (AREW1)

SISP Review Complete
Template = ADM-013

ROB received
3/9/05

From: <carltona@arcet.com>
To: <northanna_esp@nrc.gov>
Date: Mon, Feb 28, 2005 12:44 PM
Subject: DENY Dominion's application for an Early Site Permit

(624)

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

carlton apperson
906 Harrington Ave
Norfolk, VA 23517-1512

12/10/04
69 FR 71854

SISP Review Complete
Templat = AOM-013

E-RIDS = AOM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

RDB received
3/9/05

(625)

From: <sarah_gillespie@hotmail.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 12:52 PM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

12/10/04
69 FR 71854

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly. Lower water levels will adversely impact water-based recreational uses of the lake, for example by preventing access to boat launch ramps. Lower lake levels lead to mudflats in the back yards of homes located around the lake, and could decrease property values. The application also fails to sufficiently examine the increase in the lake temperature, which will negatively affect the striped bass population, a popular gaming fish, and other marine organisms. Waters downstream will be affected similarly.

In a time of increased terrorist threat, new nuclear power plants increase physical and economic risks to central Virginia residents, Dominion customers and shareholders, and nuclear industry employees. Al Qaeda is known to have considered nuclear power plants as a target for an attack. Terrorist threats and heightened Threat Advisory Levels (Orange and Red level) may lead to severe restrictions on public access to Lake Anna, which could impact local businesses dependent on public use of the lake. This has already happened at over a dozen lakes with nuclear plants around the country. Adding additional reactors to the North Anna facility could also increase its attractiveness as a terrorist target, increasing the frequency and likelihood of lake closures.

Safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application also doesn't consider what the effect might be on the cost of power in Virginia or nationally, or the need for new generating capacity. Virginia currently has a surplus of electrical generating capacity, so excess power will likely be sold outside the state rather than being used in-state to lower prices. Local residents will be forced to live with the risks of the nuclear plant without getting the benefits.

The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over $100 billion. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

E-RIDS = ADM-03

SISP Review Complete

Add J. Cushing (JXC9)

Template = ADM-013

A. Williamson (ARW1)

Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Sarah Gillespie
P.O. Box 336

Saltville, VA 24370

ROB received
3/9/05

From: <sjnbumpass@aol.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 1:13 PM
Subject: Safety and enviromental affect on all districts

(626)

Dear Sirs
I was one of the only African Americans from the Louisa County area to attend the meeting at Louisa County middle school on February 17th. The powers to be had said that they have put the information out there for all to see and participate in. Not so. My community which lies approximately 15 miles from the current power plant. None of the people living in this area have been approached or asked or given any information about the current application for and ESP at north Anna. I do not want this neighborhood left out because there are lots of minorities that live here. The Jackson district pays taxes in this county. they should be allowed the facts on the impact of this proposed nuclear reactor building. There isn't a sufficient emergency evacuation plan for Route 33. It is two lanes wide. How is it that you do not have an evacuation plan with such a limited way to get out? Most of us live very near Route 33 and according to your plan we have to get to Patrick Henry High school in Ashland. 18 miles away on a two lane road. this is not good. We need to hold town meetings in churches in the area to make the facts clear with this community.

12/10/04
69 FR 71854

Sherelle Jackson

sjnbumpass@aol.com

SISP Review Complete
Template = ADM-013

E-RIDS - ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

ROB received
3/9/05

From: <kbaldwin@post.harvard.edu>
To: <northanna_esp@nrc.gov>
Date: Mon, Feb 28, 2005 1:18 PM
Subject: DENY Dominion's application for an Early Site Permit

(627)

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

I'm especially concerned as a Dominion customer! Please don't make me consider taking my business elsewhere.

Sincerely,

Keith Baldwin
1853 Wilson Blvd Apt 364
Arlington, VA 22201-3012

12/10/04
69 FR 71854

SISP Review Complete
Template = AON-013

E-RIDS = AON-03
Add J. Cushing (JXC9)
A. Williamson (AEW1)

ROB received
3/9/05

From: Mark Elliott <maelliot@vcu.edu>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 1:22 PM
Subject: New plants irresponsible

(628)

The Dominion Web site, with regard to the existing North Anna facility, claims that:

"Continuing studies show that North Anna has very minimal effects on the environment."

Dominion's idea of "very minimal" is probably much higher-impact than most Virginians are comfortable with.
What is "very minimal" tripled? Two more plants would mean three times the environmental impact. Dominion is sure to continue calling this tripled effect "very minimal".
(http://www.dom.com/about/stations/nuclear/northanna/index.jsp)

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Dominion should be bearing the burden here. Virginians should not have to prove that a more than "minimal" impact on our precious envioronment would result. We should insist that Dominion bring their "very minimal" detriment to our environment down to zero-impact for the power plant that they ALREADY have before even considering granting permission to build more.

Look at it this way, if you found that a foster parent were abusing the children in her care in a "very minimal" way, would you place more kids with her? Child abuse of any degree or amount is unacceptable. It is the same with damage to our fragile environment. To allow Dominion to proceed with their new plans would be to REWARD them for harming our environment, however "minimally".

Mark Elliott
Richmond, VA

E-RIDS = ADM-03

Add J. Cushing (JXC9)

A. Williamson (AKW1)

SISP Review Complete

Template = ADM-013

920

RDB received
3/9/05

From: <rwatkin2@gmu.edu>
To: <northanna_esp@nrc.gov>
Date: Mon, Feb 28, 2005 1:29 PM
Subject: DENY Dominion's application for an Early Site Permit

(629)

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Robin Watkins
7406 Loughboro Ln
Springfield, VA 22150-4433

12/10/04
69 FR 71854

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Mid J. Cushing (JXC9)
A. Williamson (AEW1)

921

RDB received 3/9/05

(630)

12/10/04 69 FR 71854

From: "Freeman, Sarah" <freemans@ymcarichmond.org>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 1:35 PM
Subject: Concerns about DEIS for Dominion's Early Site Permit at North Anna

As a resident of Richmond, Virginia and a citizen of the United States, I have many concerns about Dominion's ESP and the DEIS prepared by the NRC. I am significantly concerned about the process the NRC has accepted to review new permits for nuclear reactors, and see clearly that the issues NOT included for consideration (such as where toxic nuclear waste will be stored) skew the process away from an honest discussion about the future of nuclear power in the US.

I will, however, restrict my comments here to the DEIS:

1. I hold a B.S. in Geology from The College of William and Mary and have studied the environmental and seismic features of the Commonwealth of Virginia. I cannot understand why seismic activity in the Lake Anna area was ruled out from the DEIS process. NRC material indicates that seismic features are to be considered in an EIS for an ESP. Given the earthquake of last year, and the number of faults in this area, it is irresponsible to exclude consideration of seismic features at the North Anna stie.

2. The Chesapeake Bay and its watershed are very important natural resources for the Commonwealth of Virginia. Pollution and overfishing have had negative impacts on the Bay that we are only now beginning to address and correct. The effect of decreases in lake levels of Lake Anna or increases in temperatures, particularly during drought years, due to more nuclear reactors has not been thoroughly considered for its potential effects on the Bay and its watershed.

3. While the DEIS points out that drought years have not had siginifcant impact in the past on Lake Anna's water levels, the potential for global warming should be considered. This is especially true because the ESP is valid for 20 years with the possibility to renew for 20 more. Nearly all scientists agree that some effects of climate change will be experienced in the next 20 years. The DEIS has not yet considered what would happen to the lake under the various conditions that could be caused by global climate change.

4. The discussions of potential radiation hazards to humans living near Lake Anna are not clear enough in the EIS. The document simply sites studies that are in the interest of Dominion without a discussion of why these particular studies are more scientifically credible than those indicating that nuclear reactors do cause radiation damage to the human community around a reactor. It is not scientifically appropriate to simply choose a particular set of studies without showing why.

5. It is clear in the DEIS that the no-action option was not seriously considered. The document basically summarizes it this way: There is no real environmental impact to an early site permit because an early site permit doesn't allow for the building of a nuclear reactor, therefore, a no action option is equally harmful to choosing a site. If this indeed is true, that an ESP doesn't allow for any environmental damage, why did you have one completed and waste taxpayer money and paper to prepare such a document. Either an ESP has an envrionmental impact or it doesn't. If it does, than you must more seriously consider the no action alternative.

6. One of the sites has fewer impacts than the site at North Anna and yet the DEIS recommends that the ESP be granted to Dominion. I fail to understand how this could be the case. If the point of the EIS is to determine if North Anna is the least damaging place to allow for an ESP, why would you recommend approval when there is an alternative site that would have fewer deleterious effects.

Thank you for seriously addressing the concerns above in your next EIS for the North Anna ESP.

Sarah Craig Freeman
Director of Annual Giving
YMCA of Greater Richmond

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete
Template = ADM-013

phone 804-474-4319
fax 804-788-0626

CC: <mscraigfreeman@yahoo.com>

As a resident of Richmond, Virginia and a citizen of the United States, I have many concerns about Dominion's ESP and the DEIS prepared by the NRC. I am significantly concerned about the process the NRC has accepted to review new permits for nuclear reactors, and see clearly that the issues NOT included for consideration (such as where toxic nuclear waste will be stored) skew the process away from an honest discussion about the future of nuclear power in the US.

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Sarah Craig Freeman
Director of Annual Giving
YMCA of Greater Richmond
phone 804-474-4319
fax 804-788-0626

RDB received
3/9/05

(631)

12/10/04
69 FR 71854

From: <ddority@cox.net>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 2:04 PM
Subject: Oppose North Anna Nuclear Reactor

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly. Lower water levels will adversely impact water-based recreational uses of the lake, for example by preventing access to boat launch ramps. Lower lake levels lead to mudflats in the back yards of homes located around the lake, and could decrease property values. The application also fails to sufficiently examine the increase in the lake temperature, which will negatively affect the striped bass population, a popular gaming fish, and other marine organisms. Waters downstream will be affected similarly.

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Safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application also doesn't consider what the effect might be on the cost of power in Virginia or nationally, or the need for new generating capacity. Virginia currently has a surplus of electrical generating capacity, so excess power will likely be sold outside the state rather than being used in-state to lower prices. Local residents will be forced to live with the risks of the nuclear plant without getting the benefits.

The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over $100 billion. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

E-RIDS= ADM-03

SISP Review Complete

Template = ADM-013

Add J. Cushing (JXC9)
A. Williamson (AREW1)

Renewable energy sources such as wind power create more jobs per investment dollar than does nuclear power. Those jobs also require less specialized education, increasing the chances that local workers will be able to secure the jobs rather than requiring outside experts.

A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Denise Shreeve

6732 Baron Road
McLean, VA 22101

RDB received
3/9/05

From: <conway.moy@navy.mil>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 2:22 PM
Subject: Oppose North Anna Nuclear Reactor

(632)

12/10/04
69 FR 71854

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly. Lower water levels will adversely impact water-based recreational uses of the lake, for example by preventing access to boat launch ramps. Lower lake levels lead to mudflats in the back yards of homes located around the lake, and could decrease property values. The application also fails to sufficiently examine the increase in the lake temperature, which will negatively affect the striped bass population, a popular gaming fish, and other marine organisms. Waters downstream will be affected similarly.

In a time of increased terrorist threat, new nuclear power plants increase physical and economic risks to central Virginia residents, Dominion customers and shareholders, and nuclear industry employees. Al Qaeda is known to have considered nuclear power plants as a target for an attack. Terrorist threats and heightened Threat Advisory Levels (Orange and Red level) may lead to severe restrictions on public access to Lake Anna, which could impact local businesses dependent on public use of the lake. This has already happened at over a dozen lakes with nuclear plants around the country. Adding additional reactors to the North Anna facility could also increase its attractiveness as a terrorist target, increasing the frequency and likelihood of lake closures.

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The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over $100 billion. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

E-RIDS: ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete
Template = ADM-013

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Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill-trained and ill-equipped. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Conway Moy
POB 1318

Dahlgren, VA 22448

RDB received
3/9/05

From: <mickels2@earthlink.net>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 2:28 PM
Subject: Oppose North Anna Nuclear Reactor

(633)

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

12/10/04
69 FR 71854

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E-RIDS = ADM-03

SISP Review Complete

Template = ADM-013

Add J. Cushing (JXC9)
A. Williamson (AWW1)

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Anne Mickel
1590 Patterson Mill Rd.

Bedford, VA 24523

RDB received
3/9/05

From: <letitia_johnson@ccpsnet.net>
To: <northanna_esp@nrc.gov>
Date: Mon, Feb 28, 2005 2:37 PM
Subject: DENY Dominion's application for an Early Site Permit

(634)

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Letitia Johnson
553 Glenmeadow Ter
Midlothian, VA 23114-3021

12/10/04
69 FR 71854

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW2)

935

ROB received
3/9/05

From: <lsarli@yahoo.com>
To: <northanna_esp@nrc.gov>
Date: Mon, Feb 28, 2005 2:48 PM
Subject: DENY Dominion's application for an Early Site Permit

(635)

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Sincerely,

Leonardo Sarli
5705 Washington Blvd Apt 8
Arlington, VA 22205-2948

12/10/04
69 FR 71854

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

RDB received
3/9/05

From: <don.jeffries@cox.net>
To: <northanna_esp@nrc.gov>
Date: Mon, Feb 28, 2005 3:04 PM
Subject: DENY Dominion's application for an Early Site Permit

(636)

Dear US Nuclear Regulatory Comm,

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Charging off into additional nuclear power stations is NOT THE WAY TO GO! y'HEAR??

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Sincerely,

Don Jeffries
508 Woodlake Rd
Virginia Beach, VA 23452-1124

12/10/04
69 FR 71854

SISP Review Complete
Templat = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

937

RDB received
3/9/05

From: <macdowell_r@mediasoft.net>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 3:09 PM
Subject: Oppose North Anna Nuclear Reactor

(637)

12/10/04
69FR71854

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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E-RIDS: AOM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete
Template = APR-013

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Robert MacDowell
39845 The Narrows Road

Waterford, VA 20197

ROB received
3/9/05

From: <polack101@hotmail.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 3:33 PM
Subject: Oppose North Anna Nuclear Reactor

(638)

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

12/10/04
69 FR 71854

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E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete
Templat = ADM-013

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Phil Hearne
174 South Main Street

Harrisonburg, VA 22801

RDB received
3/9/05

From: <craigcel@cps.k12.va.us>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 3:44 PM
Subject: Oppose North Anna Nuclear Reactor

(639)

12/10/04
69 FR 71854

Dear Chief Lesar

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E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete
Template = ADM-013

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Beth Craig
414 Delaware Ave. #119

Norfolk, VA 23508

RDB received
3/9/05

From: "Brian Deasy" <brian@deasyweb.net>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 4:31 PM
Subject: NO to New North Anna Reactor

(640)

Dear NRC,

I am writing to register my opposition to Dominion Virginia Power's application to build a new reactor at their North Anna facility.

Construction and operation of the new facilities will disrupt fish stocks and wetlands, simultaneously damaging the environment and disrupting recreational uses of Lake Anna.

Furthermore, the need for greater efforts to preserve and restore the Chesapeake Bay Watershed, of which Lake Anna is a part, has already been highlighted this year. Localities have already initiated debate over a "flush tax" to pay for improvements in nutrient reduction technology at wastewater treatment plants. The last thing the watershed needs now is additional strain placed upon it by pollution created during the construction and operation of a new reactor.

It is my sincere hope the commission will conclude a new reactor is not appropriate and will withhold its approval.

Regards,
Brian Deasy

12/10/04
69 FR 71854

SISP Review Complete
Templat = ADM-013

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW2)

RDB received 3/9/05

From: "Rosemarie Sawdon" <sawdon@msn.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 4:41 PM
Subject: NO TO NUCLEAR POWER

(641) 12/10/04 69 FR 71854

To Whom it May Concern:

Nuclear power does nothing to fix the country's fractured energy system. In fact, it only reinforces the inefficient system by creating a new generation of massive plants located far from the customers served in most instances.

Nuclear power has to be subsized by citizens because of its cost. Industry advocates are promising the safety, cost and oil-replacing potential of generation-after-next "pebble-bed" reactors, but these designs still
need years of research and development.

The nation is now facing aging reactors needing retirement. In the current regulatory environment the nuclear industry will soon have to shut down its heavily subsidized and privately lucrative power plants. Any new
reactors built in the next ten years would merely replace aging reactors, doing nothing to reduce our oil dependence.

And perhaps the most important argument against nuclear power is the generated waste, which is piled up at every nuclear power plant. There is no safe place for this waste to be stored, and if the Nevada storage site is eventually opened, there is not enough room for the current supply of waste, let alone
additional stockpiles.

Virginia does not need nuclear citizen-subsidized enery.

There are better answers. Technology and design advances have opened up a new way to organize our energy grid that encourages high-quality energy and healthy markets. Small natural gas turbines combined with better grid design can capture much of the wasted energy by distributing clean generating capacity closer to consumers. Instead of putting one massive power plant tens of miles from custoemrs and taking five years to build, micro turbine power plants of any size can drop in incremental capacity onto the grid where it is needed, when it is needed. Since they are affordable, they eliminate the need for market-corruping and deficit-worsening subsidies.

Wind turbins and solar cells are more efficient, nonpolluting sources of energy being used successfully.

VIRGINIA DOES NOT NEED NUCLEAR POWER

Rosemarie Sawdon
P O Box 125
Blacksburg, VA 24063

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williams (ARW1)

SISP Review Complete
Template = ADM-013

To Whom it May Concern: Nuclear power does nothing to fix the country's fractured energy system. In fact, it only reinforces the inefficient system by creating a new generation of massive plants located far from the customers served in most instances. Nuclear power has to be subsized by citizens because of its cost. Industry advocates are promising the safety, cost and oil-replacing potential of generation-after-next "pebble-bed" reactors, but these designs still need years of research and development. The nation is now facing aging reactors needing retirement. In the current regulatory environment the nuclear industry will soon have to shut down its heavily subsidized and privately lucrative power plants. Any new reactors built in the next ten years would merely replace aging reactors, doing nothing to reduce our oil dependence. And perhaps the most important argument against nuclear power is the generated waste, which is piled up at every nuclear power plant. There is no safe place for this waste to be stored, and if the Nevada storage site is eventually opened, there is not enough room for the current supply of waste, let alone additional stockpiles. Virginia does not need nuclear citizen-subsidized enery. There are better answers. Technology and design advances have opened up a new way to organize our energy grid that encourages high-quality energy and healthy markets. Small natural gas turbines combined with better grid design can capture much of the wasted energy by distributing clean generating capacity closer to consumers. Instead of putting one massive power plant tens of miles from custoemrs and taking five years to build, micro turbine power plants of any size can drop in incremental capacity onto the grid where it is needed, when it is needed. Since they are affordable, they eliminate the need for market-corruping and deficit-worsening subsidies. Wind turbins and solar cells are more efficient, nonpolluting sources of energy being used successfully. VIRGINIA DOES NOT NEED NUCLEAR POWER Rosemarie Sawdon P O Box 125 Blacksburg, VA 24063

RDB received
3/9/05

From: <djwhit@crosslink.net>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 4:45 PM
Subject: Oppose North Anna Nuclear Reactor

(642)

12/10/04
69 FR 71854

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly. Lower water levels will adversely impact water-based recreational uses of the lake, for example by preventing access to boat launch ramps. Lower lake levels lead to mudflats in the back yards of homes located around the lake, and could decrease property values. The application also fails to sufficiently examine the increase in the lake temperature, which will negatively affect the striped bass population, a popular gaming fish, and other marine organisms. Waters downstream will be affected similarly.

In a time of increased terrorist threat, new nuclear power plants increase physical and economic risks to central Virginia residents, Dominion customers and shareholders, and nuclear industry employees. Al Qaeda is known to have considered nuclear power plants as a target for an attack. Terrorist threats and heightened Threat Advisory Levels (Orange and Red level) may lead to severe restrictions on public access to Lake Anna, which could impact local businesses dependent on public use of the lake. This has already happened at over a dozen lakes with nuclear plants around the country. Adding additional reactors to the North Anna facility could also increase its attractiveness as a terrorist target, increasing the frequency and likelihood of lake closures.

Safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application also doesn't consider what the effect might be on the cost of power in Virginia or nationally, or the need for new generating capacity. Virginia currently has a surplus of electrical generating capacity, so excess power will likely be sold outside the state rather than being used in-state to lower prices. Local residents will be forced to live with the risks of the nuclear plant without getting the benefits.

The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over $100 billion. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete
Template = ADM-013

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Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill-trained and ill-equipped. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

There is at this time no solution to the problem of nuclear waste, and constructing new reactors will only worsen that problem. The proposed Yucca Mountain repository in Nevada will not open until 2010 at the earliest, but even industry experts feel 2015 is a more realistic best-case scenario. That doesn't count the remaining scientific questions about the suitability of the site, and the half-dozen lawsuits currently pending – any of which could send the U.S. Department of Energy back to the drawing board. Even if the facility were to open as scheduled, it's not large enough to hold even the amount of waste expected to be generated by currently-operating plants. Waste from new plants will require a new repository. Meanwhile, all the highly-radioactive irradiated fuel from the plants will continue to be stored on-site.

Emergency plans for dealing with an accident or terrorist attack are inadequate, and rely on teachers, bus drivers, doctors, and other civilians to facilitate an evacuation, without taking into account the possibility of role abandonment. Studies of the Three Mile Island accident, which took place in 1979 in Pennsylvania, found that doctors and other key workers abandoned their posts up to 25 miles from the site to tend to their families or save themselves. In the case of a more severe accident, heroic actions would be required to successfully carry out an evacuation.

In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Doris Whitfield
6119 Fairview Drive

King George, VA 22485

ROB received
3/9/05

From: <gwbiernot@co.hanover.va.us>
To: <northanna_esp@nrc.gov>
Date: Mon, Feb 28, 2005 4:47 PM
Subject: DENY Dominion's application for an Early Site Permit

(643)

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Lake Anna cannot physically support the addition of new reactors. Dominion's Early Site Permit application does not adequately address the increased water use associated with new reactors, which will cause the lake level to drop significantly and will raise water temperatures harming game fish.

Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

Gretchen Biernot
2026 W Main St # 1
Richmond, VA 23220-4526

12/10/04
69 FR 71854

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete
Template = ADM-013

RDB received
3/9/05

From: <veganyogini@cox.net>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 4:49 PM
Subject: Oppose North Anna Nuclear Reactor

(644)

12/10/04
69 FR 71854

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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The history of nuclear power demonstrates that constructing nuclear reactors is expensive, with final costs often running billions of dollars over budget – costs that are often passed on to ratepayers. The first 75 reactors constructed in the U.S. had a combined cost overrun of over $100 billion. The average reactor ran 400% over budget and was over 4 years late in start up. The last reactor in the U.S. to be completed, the Watts Bar plant in Tennessee, was finally opened in 1996, 23 years after it was first proposed. It cost $8 billion.

E-RIDS = AOM-03

SISP Review Complete

Add J. Cushing (JXC9)

Template = AOM-013

A. Williamson (ARW1)

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A major nuclear accident could leave an area the size of Pennsylvania uninhabitable for decades. The area around the Chernobyl nuclear plant, site of a major accident in 1986, is still closed to public access and radiation levels are still high. Cleanup costs for a major nuclear accident are estimated to be around $500 billion, not including broader economic shockwaves. The nuclear industry's liability for such an accident is capped at around $10 billion, leaving taxpayers with a $490 billion bill, ratepayers with a bankrupt utility, and surviving residents without a home.

Nearly 3½ years after September 11th, 2001, legislation to improve security at nuclear plants has not been enacted, and security improvements by the nuclear industry have been shown to have significant gaps and flaws. Security guards are often ill-trained and ill-equipped. Mock assaults designed to test guards and keep them on their toes are often done in an unrealistic manner, with months of advanced warning, and with added security forces that are not normally present to defend against a real attack.

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Rachel Page
2239 Elon Drive

Virginia Beach, VA 23454

RDB received
3/9/05

From: <DBakerPE@aol.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 4:59 PM
Subject: NUREG 1811 comments

(645)

The following comments are submitted regarding Draft NUREG 1811 (EIS for North Anna ESP):

12/10/04
69 FR 71854

1. Numerous comments have been made advocating that solar and wind power be employed instead of nuclear power. Currently available solar and wind equipment would require approximately 40 square miles of land to produce 1000 MW of power. This is much larger than the area which will be disturbed by the proposed nuclear installation. Although this proceeding cannot properly consider a different type of power plant than the one proposed, the LARGE environmental impact of a comparable solar or wind installation would preclude their consideration on environmental grounds.

2. Solar and wind systems do not enjoy large economies of scale. Systems sized for individual homes or businesses are not much more expensive per kilowatt than large scale installations. Net metering of these sources is typically available, so that expensive battery systems are not required. Those individuals who wish to get their power from these sources are free to do so, without imposing additional costs on those Dominion ratepayers who cannot afford it.

3. Dominion has recently joined the PJM interconnect. This system operates under the principle of economic dispatch, wherein the power plants which are available at any given time are dispatched on the basis of lowest operating cost. Capital cost and rate base issues are not considered. Hydroelectric and nuclear plants are dispatched first because of their low operating cost, followed by coal, gas, and oil plants. Most time periods do not require running the highest cost sources (gas and oil). It is therefore reasonable to expect that a new nuclear plant will displace an equal amount of coal fired generation most of the time.

Since coal fired generation produces large amounts of NOx, SOx, lead, mercury, and other pollutants, the proposed plant will reduce such air and water pollution proportional to it's capacity. This reduced pollution may be reflected in air or water quality improvements around the proposed site, or in other areas of the state depending on the particular coal plant which is not dispatched on any given day.

Should the Commission determine that any of the potential environmental impacts are other than SMALL, it should take into account the positive, long term improvement in air and water quality that would ensue from the reduced operation of coal fired facilities to reduce the net impact.

4. Considerable discussion of striped bass is included in the assessment. Lake Anna was created by Dominion as a cooling water source for power plants. Bass are not a native species and are artificially introduced into the lake each year by state employees. Temperature effects on the bass population is not a proper subject for consideration in an EIS, since the artificial introduction of this species by a government agency is in fact a disturbance of the natural environment. Any incompatibility of such an artificially introduced species with the primary purpose of the body of water must be accounted for and managed by the agency introducing the species, and cannot properly be considered as an impact of the power plant.

E-RIDS = ADM-03

Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete
Template = ADM-013

5. Considerable discussion is made of temperatures at various locations in the lake. Fundamental thermodynamics indicates that the additional heat to be dissipated by a new power plant will be less than or equal to the flow rate of water that would need to be evaporated to produce an equivalent latent heat of vaporization. As long as the flow rate of water needed for total heat dissipation is less than the average flow rate into the lake, it is evident that water temperature deviations within reason can be managed by engineered structures.

If any lake temperature issues are evaluated to be other than SMALL, the licensee should be afforded and opportunity to address the particular local issue with additional engineered structures or systems.

Very truly yours,

Dwight Baker, PE
http://vbi.cumberlandfirst.net/cumberland-consulting/
(http://vbi.cumberlandfirst.net/cumberland-consulting/)

RDB received
3/9/05

646

From: <strachanhm@vcu.edu>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 5:06 PM
Subject: Oppose North Anna Nuclear Reactor

12/10/04
69 FR 71854

Dear Chief Lesar

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. Among my concerns are:

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E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (AKW1)

SISP Review Complete
Template = ADM-013

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In light of these concerns, we urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

Heather Strachan
1910 w Main St

Richmond, VA 23220

ROB received
3/9/05

From: <sbyrne@framingsuccess.com>
To: <northanna_esp@nrc.gov>
Date: Mon, Feb 28, 2005 5:07 PM
Subject: DENY Dominion's application for an Early Site Permit

(647)

Dear US Nuclear Regulatory Comm,

Please register my opposition to any plans by Dominion to build any new nuclear reactors at its North Anna nuclear power station in Virginia. The site is unsuitable, and many important factors are not being considered in the decision of whether to approve Dominion's application for an Early Site Permit (ESP) at the site. Constructing new reactors would be bad for Virginia's environment, bad for taxpayers, and bad for residential and commercial ratepayers. I urge the U.S. Nuclear Regulatory Commission to DENY Dominion's application for an Early Site Permit, and for Dominion to instead focus on finding alternative methods of addressing expected increases in energy demands over the coming years.

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Additionally, safer, cheaper alternatives to new nuclear generating capacity are not being explored as part of the Early Site Permit process. The ESP application doesn't consider what the effect might be on the cost of power in Virginia, or the need for new generating capacity.

Sincerely,

sarah byrne
606 26th St
Virginia Beach, VA 23451-4026

12/10/04
69 FR 71854

E-RIDS = ADM-03
Add J. Cushing (JXC9)
A. Williamson (AEW2)

SISP Review Complete
Template = ADM-013

962

ROB received
3/9/05

(648)

From: Farley <caf4n@netzero.net>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 5:27 PM
Subject: Re: North Anna

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration, Mailstop T-6D59
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Public comment on North Anna electricity generating plant expansion.

12/10/04
69 FR 71854

Dear Sir,

It is unconscionable that any person or any group of people on this planet would ever be allowed to foist off onto future generations the problem of dealing with undisposable dangerous radioactive waste. I realize the precedent has been established with waste from military weapons and previous electricity generating plants, but that is no excuse to continue down this non sustainable path; therefore I register my objection to approving any new nuclear plants, nuclear weapons, or nuclear industrial applications.

To those who would argue that there are not enough non-polluting electricity generating options to support the population demanding electricity, I respond that the population should be reduced to the level that can be supported by sustainable non-polluting sources.

Thank you for your consideration.

Yours truly,
C. R. Farley
1305 Caroline St.
Fredericksburg, VA 22401

E-RIDS = AOM-03
Add J. Cushing (JXC9)
A. Williamson (ARW1)

SISP Review Complete
Template = AOM-013

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration, Mailstop T-6D59
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Public comment on North Anna electricity generating plant expansion.

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Thank you for your consideration.

Yours truly,
C. R. Farley
1305 Caroline St.
Fredericksburg, VA 22401

RDB received
3/9/05

From: <PrecursorS@aol.com>
To: <NorthAnna_ESP@nrc.gov>
Date: Mon, Feb 28, 2005 5:37 PM
Subject: Comments on NUREG-1811

(649)

Gentlemen:

Attached are my comments (in pdf format) on the North Anna Draft EIS. Please contact me if there is any problem reading the file.

12/10/04
69 FR 71854

Thank you for your attention.

Aviv Goldsmith
6147 Hickory Ridge Road
Spotsylvania, VA 22553 USA
(540) 582-9600

E-RIDS = ADM-03
Add J. Cushing (JxC9)
A. Williamson (ARW1)

SISP Review Complete
Template : ADM-013

February 25, 2005

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration, Mailstop T-6D59
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: North Anna ESP Permit and DEIS

Thank you for the opportunity to review and comment on the DEIS.

In preparing these comments, I have tried to follow the section numbers in the DEIS but since many items come up in several parts of the document, the comments should be considered to apply to all such occurrences. Furthermore, I apologize if comments may be referenced in the wrong section (for example, comments on impacts are given with cites to sections on the existing environment).

In general, the North Anna document does not conform to the standards for a NEPA-compliant DEIS.

1. I could not find in the DEIS a definitive statement of the proposed project's net electrical output. How can one assess the cost/benefits without this core data?

2. I could not find in the DEIS a mention of whether the proposed project would be a regulated rate-based plant or a merchant plant. How can a Dominion customer assess the cost/benefits without this core data?

3. The Executive Summary page xxi line 38 states that the ESP application (and thus by extension an EIS on an ESP) must address "site safety, environmental impacts, and emergency planning". Complete information on all three of these points is lacking in the EIS.

4. Abstract page iii line 10 et. seq. states "that the proposed action does not include any decision or approval to construct or operate one or more units". This is misleading since a lot of construction is permitted by the ESP. To the layman it seems that all but the nuclear reactor itself could be permitted by the ESP.

5. Page 1-1 states that the safety characteristics and emergency planning are to be analyzed separately from the EIS process. NEPA clearly states that an EIS is required for "any major federal action significantly affecting the quality of the human environment". Since safety and emergency planning are elements of the human environment, a NEPA EIS should address these points directly. The EIS is intended to be a primary source of impact information (both

positive and negative). Besides the legal shortcomings of the current approach, how can the public and local governments be well-informed about the project if the basic data, analysis, and conclusions are spread across a variety of proceedings? This unfairly disenfranchises stakeholders.

6. Page 1-3 states that the ER does not need to include discussion of energy alternatives. A NEPA-compliant EIS, on the other hand, does need to.

7. Page 1-3 states that the EIS does not include an assessment of the benefits of the proposed action. It is thus not a NEPA-compliant EIS.

8. Page 1-5 line 28 mentions the North Anna Dam. Shouldn't an analysis be done and included herein on the safety and environmental impacts if the Dam is breached?

9. Page 1-2 line 41 mentions the thermal capacity of the plant but not the electrical (useful) capacity. This major omission does not allow the reader to determine the efficiency of the power plant.

10. Page 1-6 line 3 states that the proposed fourth plant would use dry coolers. Is there an operating nuclear plant in the U. S. that has demonstrated this technology is appropriate and safe for such a large thermal load? If not the technology risks should be assessed and discussed herein.

11. Page 2-1 line 24 mentions that I95 passes within 16 miles of the site. Later sections do not adequately detail the impact on I95 during upset conditions at the plant or upset conditions on the road. The DEIS fails to demonstrate that a plant upset would not adversely impact I95 or US1 which is THE major north-south corridor in the Mid-Atlantic region.

12. Page 2-1 talks about a 50-mile radius but in other parts of the document different radii are used (see for example Figures 2-3, Table 2-1). A consistent area or areas should be used throughout the document. For example, a 15 mile radius might be the HIGH area of impact, a 50 mile radius (which would include Richmond) might be MEDIUM areas of impact, and an 80 mile radius (which would include DC) might be a LOW area of impact. For each parameter addressed in the DEIS the impacts in each area of impact should be defined. Impacts on DC must be addressed.

13. Page 2-5 line 1 states that the Lake Anna Special Plan is "final". Please verify this statement. Furthermore, it would be useful to state whether the Plan addresses nuclear expansion in the region and/or nuclear evacuation plans. There may be a disconnect between local planning and the proposed project.

14. Along the lines of comment 12 above, Page 2-5 line 10 defined "the region" as within a 50 mile radius but provides no basis for why that area was

selected. In this comment I also noted that DC is generally considered part of the region.

15. Page 2-5 line 30 rightfully states that "the land adjacent to Lake Anna is becoming increasingly residential as the area is developed". No new transportation routes (roads or railroad lines) or new industrial activities are currently planned in the vicinity..." The combination of increased population without increased transportation for emergency egress/ingress could be a recipe for disaster even without the proposed nuclear expansion. This DEIS statement itself is enough basis to reject the later conclusion that impacts on transportation and the human environment are small.

16. Page 2-7 line 26 lists a variety of local planning documents. What do these plans say about nuclear material transport, nuclear material storage, power generation facilities, nuclear waste storage, and nuclear waste transport through the jurisdictions? Simply listing the local planning documents does not define the current planning environment against which the proposed action is to be judged as an overlay. As stated in comment 13, there are disconnects between local planning and the proposed project.

17. What is the current status of Dominion's VDEQ certification as discussed on Page 2-8, line 16?

18. Page 2-9 line 1, Sections 3.3, 4.1.2, 5.1.2, 5.8.4, etc. discuss transmission access, a critical component of determining site suitability. The document asserts that no transmission expansion would be required at any time any place within the region within twenty years after receipt of the ESP and that the entire electrical output of two new nuclear generators can be transmitted.

    I have three problems with the approach: (A) The conclusion is suspect – rules of thumb (no details where given on the line configurations) indicate that the three lines would have a combined capacity of about 1,750 MW so the lines would be above capacity with the four nuclear units. (B) The methodology is flawed – the EIS says that the line capacity is available and that the load flow study (to verify the assertion) would be done later!! That is not a scientific approach suitable for a DEIS. If the load flow study is done later (or conditions on the line change) and it is determined that additional lines are required, the DEIS conclusions about the site would be voided. (C) The "bubble concept" requires that any new transmission lines be analyzed in the DEIS.

    If Dominion stands by its assertion that no new transmission is required, Dominion could stipulate that as a condition of the ESP. Otherwise, a detailed transmission assessment and a study of the related impacts must be done now and incorporated into the DEIS. This should include a 20-year load flow forecast.

19. Page 2-9 line 15 discusses "the region" and it fails to mention that Fredericksburg is within the radius drawn. Was Fredericksburg considered in other parts of the analysis?

20. Table 2-1 shows the Land Use in four nearby counties. On this and other measures, the DEIS review of the Existing Environment should include a forecast of the conditions over the twenty year life (since the timing for the action is uncertain) of the EPS as the baseline. Given the rapid population growth in the area, the 2002 data cited is already obsolete and huge changes are already forecast for the region even without considering the proposed project. Spotsylvania, for example, is one of the fastest growing areas of the State. If the DEIS showed current conditions and forecasts for say 5, 10, 20 year intervals as the baseline, the impacts of the project could be put into better perspective.

21. Table 2-1 shows data for four counties. As mentioned in our comment #12, this is inconsistent with discussion of a "region" of study.

22. Page 2-11 mentions that the summers are hot and humid. What is the suitability of dry coolers (for the proposed Unit 4) to this climate? This could be problematic given the statement on Page 2-13, line 15 that relative humidity is not measured at the site.

23. Page 2-12 line 4 confirms that the prevailing winds are from the south-southwest. This is just one reason that impacts on Fredericksburg and the DC metropolitan area should be assessed.

24. Page 2-13 line 15 states that relative humidity is not measured at the site. Regional warming of the Lake contributes to microclimates, increased humidity, and intermittent ground fog. This parameter should be measured.

25. Page 2-13 line 27 indicates that heavy fog is an issue at the site. The increased warm water from the proposed project would contribute to increased heavy fog during some cooler days. The impacts to traffic from this occurrence should be addressed in the DEIS.

26. Page 2-13 line 31 discusses that severe weather may occur in the area. These weather events can contribute to power outages and disruption of road access. Increased generation of power from a few large power plants in one location does nothing to improve regional system transmission stability whereas de-centralized generation would offer that benefit.

27. Page 2-14 line and other parts of the report use inconsistent meteorological reporting periods and thus an inconsistent data set.

28. Page 2-14 line 14 reports on storms during the period from January 1950 through July 31, 2003. This is an arbitrary time period which does not include Hurricane Isabel, for example.

29. Page 2-25 line 25 states that good data is available from 1/1/96 to 12/31/01 yet line 32 states that only a portion of this interval was used for the DEIS analysis data. Why? Furthermore, the use of a three year data set is arbitrarily low.

30. Page 2-15 line 36 states "The NRC staff expects that the current monitoring system would remain operational". The applicant should be required to stipulate to this and add additional monitoring (for example, relative humidity) as may be required.

31. The small data set cited in 29 is especially problematic given that it is used for the radioactive dispersion assessments (Page 2-16, line 5).

32. Although there is assessment of design-basis accidents and routine releases, no assessment of worst case releases is included. This data would be important for the public and local governments and should be included.

33. Page 2-18 line 18 states that this DEIS tiers off the preoperational environmental radiation monitoring program. Since the two units have been operational for some time, the baseline should be re-established via a new study.

34. Page 2-18 line 33 states that the NRC concluded that radiation doses were small. Since a DEIS is intended to be a public document, data of this type should be summarized and included in the DEIS along with the staff conclusions derived there from.

35. Page 2-20 line 9 states that units 1 & 2 have "likely" added to evapotranspiration. Since a DEIS is intended to be a public document, data of this type should be summarized and included in the DEIS along with the staff conclusions derived therefrom. If actual data is not available then the formulae or methodology for prediction should be included.

36. Page 2-21 line 31 is very troubling. It states that "it is not possible to create a reliable water budget for Lake Anna". How then, can any of the impact forecasts be reliable?

37. Page 2-21 line 40 discusses that limited data is available. Why have no dye experiments been done and the information used? Since hydrology is a key *site characteristic* and not an operating parameter, deferring velocity flow measurements to the CP/COL stage is not good science or proper EIS procedure.

38. Page 2-22 line 30 mentions other surface water users. Have these entities been directly consulted?

39. Page 2-22 line 41 states that there is "limited projected development in the three upstream counties" which includes Spotsylvania. This statement, and therefore any conclusions drawn from it, is false. The February 23, 2005 Free Lance Star reported that Spotsylvania is one of the 20 fastest growing counties in the United States!

40. What would be the impacts to the project and the Lake Anna area if the Virginia State Water Control Board designates it as a surface water management area (Page 2-23 line 25)?

41. Page 2-24 line 33 states that the proposed unit 4 is "expected" to use dry cooling towers. Since this is the basis for the entire DEIS, Dominion should be required to stipulate to this approach.

42. Page 2-24 line 38 states that "there are no site-specific data available for the chemistry of the groundwater underlying the ESP site." Why not? Shouldn't groundwater monitoring wells, water sampling, and chemical analyses be part of the ongoing monitoring of a nuclear power project that stores radioactive waste? Shouldn't baseline monitoring be required now as part of the impact evaluation of the proposed units 3 and 4? This data is clearly on point in evaluating a site as opposed to evaluating its operations (CP/COL).

43. Page 2-25 line 15 states that "many of the same monitoring activities would be continued". The applicant should stipulate now that monitoring activities will be continued and expanded. Preferably, monitoring activities should be detailed as one of the mitigation measures in a DEIS.

44. Page 2-25 line 35 again states that "many of the same monitoring activities would be continued". The applicant should stipulate now that monitoring activities will be continued and expanded. Preferably, monitoring activities should be detailed as one of the mitigation measures in a DEIS.

45. Page 2-27 line 29 discusses wetlands associated with streams and one within the ESP site. What wetland preservation efforts will be done?

46. Page 2-29 lists some of the birds in the areas. Dry coolers may emit high-pitched sounds. What are the impacts on avian and terrestrial species?

47. Page 2-31 line 30 mentions that Dominion has cooperated with Ducks Unlimited and the Audubon Society to allow informal monitoring. Has the NRC consulted directly with these groups?

48. Page 2-31 line 31 states that the "NRC expects Dominion to work with the State on development and implementation of any required monitoring programs". The applicant should stipulate now which monitoring activities will be implemented. Preferably, monitoring activities should be detailed as one of the mitigation measures in a DEIS.

49. Page 2-34 line 6 discusses clams in Lake Anna. What chemical and mechanical control measures against clams and other aquatic organisms are used by Dominion to protect the cooling water intakes and outflows? What assurances are there that these organisms will not interrupt the flow of necessary cooling waters? The discussion on page 2-39 line 28 is too cursory to be evaluated.

50. Page 2-34 line 6 discusses clams in Lake Anna. How will the increased lake temperature from the proposed units effect the clam populations?

51. Page 2-34 discusses fish populations. What percentage of fish catches and deaths show abnormal anatomy? How does this percentage compare to inland waters around other nuclear plants? How does this percentage compare to inland waters not near nuclear plants?

52. Page 2-36 line 42 states that striped bass are already subject to environmental stress from the existing two units but the later discussion about the impacts of increased thermal loading from additional nuclear units is cursory.

53. Page 2-37 line 15 talks about "professional fishing guides" and line 25 states that the Lake "is heavily fished". What compensation will there be to these business if the impacts of increased thermal loading from additional nuclear units affects their business?

54. Page 2-37 line 24 acknowledges the project proximity to Washington, D.C. yet the document is largely void of discussion of impacts on the D. C. area.

55. Page 2-40 line 11 states that the WHTF "is physically separated from the rest of Lake Anna by a series of dykes". What is the susceptibility of the WHTF to earthquakes, hurricanes, and other natural or terrorist disasters?

56. The socioeconomic sections of the DEIS are unfortunately weak. The DEIS thus cannot be used as an effective decision-making tool.

57. The lack of analysis and discussion of security against terrorist threats is a major omission. This subject is clearly part of today's "human environment". It is ironic that on the morning of the Louisa public hearing that the federal government announced that the U. S. is still the target for such acts yet the ESP process seems to ignore any analysis and disclosure on this subject.

58. The lack of detailed safety discussions in the socioeconomic sections is a major flaw in the ESP process. Thus the DEIS cannot be effectively used as a decision-making tool.

59. Page 2-45 line 16 states that the "impact area for the analysis" includes only the counties of Henrico, Louisa, Orange, and Spotsylvania and the City of Richmond. This area is too small because likely and potential impacts exceed as far out as 80 miles from the site. This area is arbitrary and inconsistent with other study areas used in the DEIS (see comment #12).

60. The demographic data used in section 2.81 on Page 2-45 is outdated and inaccurate. Spotsylvania County, for example, has grown 24% in the last five years!

61. As stated in comment #20, a population forecast through 2026 should form the baseline of the existing environment. The project could then be overlayed on this forecast to assess impacts at different time intervals.

62. The use of population radii in Section 2.81 is good. However inconsistent radii are used throughout the section so comparisons (for example of stable and transient populations) are difficult.

63. Page 2-48 mentions Paramount's Kings Dominion. Have they been directly consulted about the likely impacts of the proposed project on their facility and its use?

64. Page 2-48 states that Kings Dominion usage rates "could" slow in the future. They easily "could" increase or remain stable, depending on the regional economy, the success of the Kings Dominion's marketing efforts, and any impact that the proposed project would have on the region.

65. Page 2-54 line 41 cites a 2002 study that Capital One is one of the largest private employers in the area. How have well-publicized job cuts there since 2002 changed this rating?

66. I appreciate the section on Environmental Justice in plant siting. How does the conclusion reached therein mesh with the statement on page 2-55 line 29 that Louisa County (where the project would be sited) has the second highest poverty rate and second lowest median income?

67. Page 2-55 states that NAPS has been economically beneficial to Louisa County but does not cite any data to quantify this impact.

68. Page 2-55 states that Louisa County would like to lessen its dependence on NAPS through diversification of the local economy. The proposed project

would be counter to this local goal. What mitigation measures is the applicant proposing to foster the County's diversification goals?

69. What mitigation measures is the applicant proposing to provide direct economic benefit from the proposed project to those neighboring counties that do not receive tax revenues?

70. Page 2-57 line 9 states that "there are no growth restrictions in Spotsylvania County". Please define this phrase. The County has zoning and other restrictions.

71. Page 2-57 line 32 mentions that there are 32 counties within a 50 mile radius of the project. It is not clear whether this 50 mile radius is the subject area for this part of the analysis. As stated in comment #12, consistent subject areas should be used.

72. Page 2-57 line 34 acknowledges that there are only two major freeways in the area. The impact on these thoroughfares and their feeder roads during an evacuation is not really addressed in Sections 4-7.

73. Along the lines of the prior comment, Sections 4-7 does not address the impacts to the commuter roads listed on page 2-58 line 6.

74. Page 2-58 line 13 acknowledges that the Thornburg area is getting congested. This is a major route to/from Lake Anna and there currently are no funds dedicated to the needed improvements.

75. The traffic discussion on pages 2-59 and 4-25 regarding Spotsylvania roads is hard to understand and I am familiar with the local road network and plans. Presently, Courthouse Road is 208, not the Spotsylvania Parkway. The Spotsylvania Parkway is significantly north of route 606.

76. Section 2.8.2.5 on Housing and the related parts of Sections 4-7 do not assess the impacts of the proposed project on housing values in the Lake Anna area.

77. The assumption on page 2-62 line 36 that temporary housing for refueling workers is as dispersed as for permanent employees is unsubstantiated. Furthermore, if four units are operational, the potential for overlap of refueling outages increases and thus the possibility that significantly more than 700 temporary workers would be required at one time.

78. The "Police, Fire, and Medical Facilities" section on page 2-68 is substantially flawed. It states that there are TWO hospitals in Spotsylvania when there are NONE.

79. The lack of full-time hospitals and fire/rescue facilities in the immediate Lake Anna area creates a high potential for serious impacts from an accident at the project.

80. Page 2-72 line 26 mentions that some undisturbed areas have some potential for cultural resources. I was unable to find in the DEIS a statement that these areas would be examined and cleared prior to any site work occurring there.

81. The proxy plant approach that is used to define the Plant Parameters in Section 3 and elsewhere is hard to follow. Min, average, and max values for each key parameter should be clearly identified.

82. What is the rationale for not using the same plant values in the DEIS and the safety review (Page 3-3 line 18)? It seems like bad science.

83. What is the rationale for not using the PPE in the transportation analysis (Page 3-4 line 37)? Mixing methodologies weakens the conclusions that can be drawn.

84. Where data is referenced from another document like in Page 3-5 line 31, a summary should be included in the DEIS.

85. It would be helpful to provide comparisons for Plant Parameters to the existing two units.

86. What is the capital and operating cost associated with the dry coolers (Page 3-7 line 22)?

87. Page 3-7 line 27 refers to the "PPE concept" to define the boundaries of liquid radioactive effluents and system performance but no summary of the data is included.

88. The conclusion of Section 4.1.1 is that the Construction phase would only have "SMALL" impacts (defined on page xxii as "not detectable or so minor that they will neither destabilize nor noticeably alter any attribute..."). This is obviously false for a project with a capital cost of greater than $500 million and with about 5,000 construction jobs in a largely rural region.

89. Page 4-4 line 9 states "potential" mitigation measures. The DEIS should specify the actual mitigation measures to be used which should be stipulated by the applicant.

90. Section 4.2.2 states that Construction impact on transportation is SMALL. The text ("2800 vehicle trips per day", roadways would experience congestion, "five existing roads are expected to he impacted") does not support this conclusion and seems to indicate a LARGE local impact.

91. Section 4.2.2 does not include detailed background transportation counts or LOS projections which are typically used to assess transportation impacts. The suggested methodology is to do a 20-year traffic forecast as the baseline and then overlay the 2800 vtpd at several instances to assess the impact.

92. Since Section 4.3.1 line 9 states that "Dominion did not provide information on wetlands in its ER" how can the DEIS conclude that the impacts of hydrological alterations would be SMALL? The text discusses numerous possible impacts.

93. Section 4.3.1 line 9 states that "Dominion did not provide information on wetlands in its ER". That does not relieve the NRC as lead agency from its responsibility to collect, analyze, and report information on wetlands in the DEIS. This information must be included since Page 2-27 line 29 mentions that there are wetlands in the vicinity.

94. Page 4-8 line 15 discusses possible third-party permit conditions that "may" restrict the timing of certain construction activities. What if these permits are not imposed by the other agency? The applicant should stipulate here the mitigation measures to be applied.

95. How will the increased temperature of the lake contribute to mosquito populations, particularly those that are West Nile disease carriers?

96. Section 4.5.1.1 fails to account for the fact that the construction and new plant operation will provide increased access to the site which could increase the potential for accidents and terrorism.

97. Page 4-17 line 11 discusses a ten mile radius from the site without providing a rationale for why this radius was selected. As suggested in comment 12, I believe that rationales should be provided and several radii should be used for all parameters studies.

98. The conclusion of SMALL impact for Section 4.5.1.3 is not supported by the text or the actual situation in the region. There is little to no funding for road expansions. The VTRANS 2025 report shows that gridlock is *expected* on major roads and at major interchanges.

99. In Section 4.5.1.3 local officials are cited as being of the belief that road alterations need to be evaluated "prior to construction". This does not mean that this issue should be deferred to the CP/COL stage – local access and the impacts on transportation are clearly site related issues and should be thoroughly evaluated at this time.

100. Section 4.5.2 ignores the strain that a new populace would place on the limited health care resources in the region. This is a major socioeconomic factor and should be thoroughly analyzed.

101. Section 4.5.3.1 should include typical salary information for the jobs to be created.

102. Page 4-22 line 17 seems to indicate that the NRC consulted primarily with Dominion in assessing whether there is a sufficient labor force. Independent analysis should be done especially since the residential and commercial construction markets have taken off since the December 2003 survey.

103. The conclusion of SMALL impact for Section 4.5.3.2 is not supported by the text or the actual situation in the region. There is little to no funding for road expansions.

104. Page 4-24 line 9 states that mitigation measures would be required. These measures should be detailed now and included in the DEIS.

105. The Spotsylvania road improvements on page 4-25 line 7 are not fully funded and thus may not occur or may be delayed.

106. There is no planned Spotsylvania Turnpike exit from I-95 (Page 4-25 line 36).

107. Page 4-25 line 39 acknowledges that the I-95/606 interchange is congested at "LOS D or worse". Line 13 acknowledges that SR208 from Blockhouse Road to Lake Anna (about 12.5 miles) is a minor two-lane road. Increased construction usage will have major impacts on these roads. If an evacuation is required during the construction interval when additional personnel are on site, the impact would be staggering.

108. Section 4.5.3.3 is almost useless without including indicative numbers for the capital and operating costs and the likely tax contributions that would result.

109. Section 4.5.3.3 should consider the potential for loss of property tax revenue from the residential sector in the area if the proposed project results in a devaluation of real property.

110. The conclusion of SMALL impact for Section 4.5.3.5 is not supported by the text or the actual situation in the region.

111. What is the estimated number of new residences that would be required in Spotsylvania to serve the construction (and later operating) personnel? If

these persons have school age children, this would add to the growing education demands.

112. Why not stipulate the need for cultural resource assessments now (Page 4-35 line 37)?

113. The mitigation measures mentioned on page 4-37 line 35 should be stipulated to by the applicant. "Developing a plan" at a later stage as mentioned in Section 4.10 is not adequate.

114. Why isn't the independent spent fuel storage facility underground (Page 4-40 line 10)? This would help protect it for air attacks.

115. The dose assessment on Page 4-40 line 28 ignores potential overtime hours.

116. Why were samples taken to the west when the prevailing winds are to the northeast (Page 4-41 line 30)?

117. Section 4.9.4 gives a mean forecast. What about potential upset conditions? Shouldn't a worst case analysis be included for low-probability events?

118. The measures outlined in section 4.10 are a good start but additional detail is required now to understand the likely site impacts.

119. Page 4-44 line 32 change the word "may" to "would".

120. Page 4-46 line 1 states that Dominion would post a $10 million guarantee. Given the recent risks in the utility industry, Dominion should be required to post a Letter of Credit from a bank rated A or better in the event that its own credit rating drops below investment grade.

121. The NRC and applicant should stipulate that there will be no extension of the 20 year ESP window under any circumstances. Otherwise, statements like those on Page 4-47 line 2 are worthless and the DEIS analysis becomes even more detached from actual conditions.

122. Page 5-1 line 13 states that the operating period for the proposed project would be 40 years. Is the applicant prepared to stipulate that? If not, would another EIS be required for an extension of the COL?

123. Page 5-1 line 40 states that "any growth would be managed" because the counties have land-use plans. Just because the counties have plans, doesn't mean that growth is managed. Furthermore, at least for several of the adjacent counties, the plans do not specifically contemplate the proposed action.

124. Page 5-2 line 35 mentions that air quality impacts of "routine" releases would be limited. The document does not include a good analysis of the "non-routine" releases. It would be helpful to understand the potential magnitude of these releases even if they have a low probability of occurrence.

125. Section 5.3 does not fully address downstream impacts of the proposed project.

126. Page 5-4 line 20 references a water budget model yet on page 2-21, the document states that a reliable water budget model does not exist.

127. Page 5-4 line 21 seems to infer that during normal years the water level in the Lake would be acceptable. What about during drought years?

128. Page 5-4 line 25 refers to the drought as a "climatic anomaly" -- droughts are normal occurrences over time.

129. Page 5-5 line 15 discusses a methodology that was used to estimate evaporation rates. Was the higher Lake temperature to be expected from the proposed Unit 3 included in this analysis?

130. Page 5-5 discusses a very weak methodology for assessing water impacts. Line 16 acknowledges that the method has the potential for significant error. Given the importance of the Lake to the region, a more rigorous analytical method should be used similar to that used for FERC hydro applications for inflows.

131. What was the length of the dataset from which the data was extracted for the analysis on Page 5-5 line 33?

132. Were the Section 5.3 methodologies that were developed back-tested against actual water levels? What was the level of significance of the match between the forecasts and actual levels?

133. Page 5-6 line 22 is missing data in the parenthesis "9.7 BTU/hr" is not correct).

134. The PPE methodology discussed on page 5-6 line 39 is too simplistic. Since both ambient and water temperatures are hotter during the summer, a seasonal analysis should be done. This would also permit better analysis of the temperature impacts on aquatic species since their activities can be seasonal (Section 5.4.2.7 states that cool months would have SMALL impacts on striped bass).

135. The impact analysis deferral on page 5-7 line 11 is objectionable.

136. The data presented does not support a SMALL impact rating on page 5-7 line 19. The very fact that Unit 4 would be designed to use air coolers indicates that the water impacts are much larger.

137. Why wasn't actual site meteorological data considered for the analysis mentioned on page 5-8 line 22?

138. What duration of meteorological data was used for the analysis mentioned on page 5-8 line 22?

139. Page 5-8 line 41 states that the Lake level is being managed to maintain a stable level of 76.2 meters yet the modeling results on Page 5-9 predict a lower level for all four scenarios mentioned.

140. Page 5-9 line 10 references a water budget model yet on page 2-21, the document states that a reliable water budget model does not exist.

141. Given a MODERATE impact rating on Page 5-10 line 10, how can the statement that no mitigation is warranted be correct? The proposed facility, if permitted, should be required to have design and operational mitigation to minimize the water impacts. These mitigation measures should be spelled out in the DEIS.

142. Dry coolers may emit high-pitched sounds which could affect certain wildlife. The frequency characteristics of the noise should be assessed in addition to the sound pressure levels in Section 5.4.4.

143. What is the basis for the statement on Page 5-11 line 32 that collisions would be rare.

144. How can a 20% change (52% from 44%) in the low flow conditions not have noticeable downstream impacts?

145. Delete the phrase "if additional power from Units 3 and 4 is transmitted through this system" from the end of Section 5.4.1.4.

146. How can a 300% increase in the number of fish impinged (422,000 per year from 182,000) be considered a SMALL impact in Section 5.4.2.2?

147. Although Section 5.4.2.3 concludes that entrainment impacts would be SMALL, the *cumulative* effects of impingement, entrainment, radiation, and other aquatic hazards should be assessed and described (Section 5.4.2.7).

148. The assumption in 5.5.1.3 that "any needed upgrades in the road system would have been made" is flawed. This assumption leads to the DEIS

conclusion that road impacts are SMALL. Funds for transportation in Virginia are seriously constrained. The analysis should be re-done without this assumption.

149. Ground fog is a serious problem along Route 208 in the vicinity of the Lake at times (Page 5-37). This problem will be worse if the Lake waters are heated up.

150. What microclimatic temperature increases and secondary impacts could result from the dry cooler operations (Page 5-38 line 3)?

151. Change the word "could" to "would" on Page 5-18 line 18.

152. Change the word "could" to "would" on Page 5-41 line 18.

153. Sections 5.5.3.1 and 5.5.3.2 do not consider evacuation impacts.

154. Page 5-42 on taxes mentions utility deregulation. Would the new units be merchant plants or rate-based?

155. The sentence starting on Page 5-43 line 39 is too speculative and should be deleted.

156. Sections 5.5.3.4 and 5.5.3.5 should assess the impact on recreation and local housing if there is a nuclear accident at the facility.

157. Section 5.5.3.5 should assess the impact on local housing values from the proposed project.

158. The section in 5.5.3.6 on Police, Fire, and Medical Services is flawed. It states that patients travel to Spotsylvania for hospitalization, but in reality is no hospital there.

159. The fact that there are no hospitals in the three closest counties (Orange, Louisa, and Spotsylvania) should weigh heavily against the proposed facility. How far is the nearest hospital?

160. Sections 5.9 and 5.10 do not provide sufficient analysis on the impact of upset conditions. Even though these are low probability occurrences the impacts would be large.

161. The paragraph on page 5-70 line 14 would benefit from simpler language.

162. More than three years of meteorological data should be used in Section 5.10.1.

163. "The probability of a severe accident without the loss of containment" mentioned on page 5-74 line 22 is just slightly less than the probability of winning the Lotto South jackpot.

164. The mitigation measures listed on page 5-84 should be stipulated to.

165. Section 6.0 should include a statement of the government subsidies and tax incentives that are provided for nuclear fuel production, fuel and waste transport, and waste disposal.

166. The DEIS should include a statement of the amount of government funds that are available for the North Anna ESP process.

167. No credence can be put into Section 6.2.4 and the conclusion that the impacts are SMALL given the starting statement of "considering the uncertainties in the data and computational methods".

168. Section 6.0 should include an analysis of nuclear waste disposal.

169. The introduction to Cumulative Impact section states on Page 7-1 line 22 that "if a resource is regionally declining or imperiled, even a SMALL individual impact could be important it if (sic) contributes to or accelerates the overall resource decline." This situation certainly applies to regional transportation and roads, yet this is ignored in the DEIS.

170. The list of alternatives in Section 8 should include the following:
    a. Life extension of the existing two North Anna reactors
    b. Retirement of the existing two North Anna reactors
    c. Constructing the new reactors and radioactive material storage underground to increase security against an air attack
    d. Non-nuclear generation sources

171. It is hard to reconcile the statement on page 8-2 line 36 that "WHTF conditions could extend into approximately 19 percent of the main body of the lake" with the SMALL impact designation for this parameter.

172. The lack of significant variance among the alternatives I Table 9-1 make the impact analysis process and quantification scale suspect.

173. In Table 10-3 the impacts listed for the No-Action Alternative should be "NONE" not "SMALL".

174. An EIS is supposed to be prepared by an independent multi-disciplinary team. To what extent did the NRC commission any independent environmental reviews above the data presented in Dominion's ER? This is not clear from Appendices A and B and the cited references.

175. For a project of this magnitude it seems that one public hearing in one location is insufficient to provide the public an opportunity to get educated and provide comments. I know that I personally was unable to attend the revised hearing date due to work requirements. I again restate my request for another public hearing on the DEIS.

176. Based on the above review, I believe that the document is substantially flawed and request that these comments and others be fully addressed and that another DRAFT EIS be released. Unless such an action is taken, concerned citizens and local governments (and indeed the NRC since it is supposed to be relying on the DEIS for decision-making) cannot make informed decisions about the proposed project.

177. The flaws in the document do not provide the scientific, legal, or policy background to support a finding to recommend the ESP.

I am available to clarify any of these comments. Thank you for your consideration.

Sincerely,

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