

From: "Irons, Ellie" <elirons@deq.virginia.gov>
To: "David Kaiser" <David.Kaiser@noaa.gov>, "Jack Cushing" <JXC9@nrc.gov>
Date: 10/3/05 8:08AM
Subject: FW: Friends of Lake Anna letter to U.S. Sec. of Commerce

FYI. Similar letters were sent to the Governor, Secretary of Natural Resources. And the Director of DEQ.

-----Original Message-----

From: Harry Ruth [mailto:HC.RUTH@LOUISA.NET]
Sent: Friday, September 30, 2005 9:02 PM
To: Irons, Ellie
Cc: Bob Richards
Subject: Friends of Lake Anna letter to U.S. Sec. of Commerce

Dear Ms. Ellie Irons,

Attached FYI is a letter that we have sent via regular mail to the U.S. Secretary of Commerce, with a copy to the National Oceanic & Atmospheric Administration, Office of Ocean & Coastal Resources Management requesting his support. As you can see we have asked that the U.S. Dept of Commerce, National Oceanic and Atmospheric Administration not issue any permits that would allow the granting of an Early Site Permit to Dominion Resources for a 3rd water cooled reactor at North Anna. We would support a dry-air-cooled third reactor. Please do not hesitate to call if you have any questions. I will be out of town for the next 10 days and will return on 10 October. Bob Richards (Phone 540-894-4670) will assist with any data you may need prior to my return.

Sincerely,

Harry Ruth

for the Friends of Lake Anna

Phone 540-872-3632

Mail Envelope Properties (43411F1B.35C : 21 : 50012)

Subject: FW: Friends of Lake Anna letter to U.S. Sec. of Commerce
Creation Date: 10/3/05 8:07AM
From: "Irons,Ellie" <elirons@deq.virginia.gov>

Created By: elirons@deq.virginia.gov

Recipients

nrc.gov
owf4_po.OWFN_DO
JXC9 (Jack Cushing)

noaa.gov
David.Kaiser (David Kaiser)

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Route
nrc.gov
noaa.gov

Files	Size	Date & Time
MESSAGE	1333	10/03/05 08:07AM
TEXT.htm	6004	
U.S. Sec. of Commerce -letter requesting no Dominion appeal or permits - 30Sep05.doc 49152 Mime.822	77665	

Options

Expiration Date: None
Priority: Standard
Reply Requested: No
Return Notification: None

Concealed Subject: No
Security: Standard

FRIENDS OF LAKE ANNA, VIRGINIA

30 September 2005

The Honorable Carlos Gutierrez (U.S. Secretary of Commerce)
U.S. Department of Commerce
1401 Constitution Ave. N.W.
Washington D.C. 20230

Dear Secretary Gutierrez,

The Friends of Lake Anna, representing over 2,100 users of Lake Anna, request that you address our concerns that are created due to the proposed expansion of Dominion Resources' North Anna nuclear power plant. We are not anti-nuclear, nor do we have "not in my backyard" sentiments. Dominion Resources has applied to the U.S. Nuclear Regulatory Commission for an early site permit to add two new reactors to the North Anna power plant. The two existing reactors use once-through cooling with water from Lake Anna. New unit three would use the same system, while unit four would be air cooled. Our concerns relate to lack of water in the water shed, lake level, unhealthy conditions caused by high water temperature, plus damage to the fish & wildlife in the North Anna River.

We are concerned that using lake water to cool unit three would destroy the gem of central Virginia that is Lake Anna and the North Anna River. These treasures are enjoyed by over 500,000 persons annually. We just don't want this beautiful and desirable 13,000 acre lake and river needlessly destroyed in the process. Air-cooled technology is available to avoid this destruction. In fact, Dominion proposes that Unit four be air-cooled.

The basic problem with water cooling for unit three is that, according to a March 2005 report from the Virginia Department of Environmental Quality (VDEQ), there is not enough water in the Lake Anna watershed to cool unit three without causing severe environmental problems. Drought conditions in Lake Anna and the North Anna River below Lake Anna would occur three times as often. Lake water levels would decrease about 2.6 feet an average of 26 *additional* days per year. Water temperatures in the lake would increase between five and ten degrees, reaching levels up to 113 degrees that are hazardous to human health. If supplemental cooling is added to mitigate the hotter water, as proposed by Dominion, drought conditions would be exacerbated further providing an approximate 4.6 feet decrease total in water levels. These effects would greatly diminish the lakes and rivers recreational value and would cause serious harm to wildlife, including some protected species.

According to VDEQ, these drought conditions would cause lots of problems for fish in the North Anna River. To quote their report: "Increasing the drought frequency to the proposed extent would have an unacceptable negative impact on this fishery". Virginia's Department of Water Resources has issued at least three different memos indicating there is insufficient water in the North Anna watershed to support another water-cooled reactor at the North Anna Plant.

The Va. State Health Commissioner has indicated that "immersion in water at temperatures above the body's normal temperature of 98.6 can be expected to affect sweating and heart rate. Deaths from thermal stress have been reported. In addition, primary amoebic meningoencephalitis (PAM) is rare but nearly always a fatal infection that is caused by warmth loving free-living ameba that naturally inhabits freshwater lakes. Scientists have reported PAM species in water that was thermally enriched by power plant effluents in Virginia. Common sense suggests that to reduce the risk of PAM, swimmers should avoid swimming in waters when surface water temperatures are greater than 94 degrees.

Dominion's proposal also fails to consider future community water needs. Louisa, Spotsylvania, and Orange Counties (the small watershed that feeds Lake Anna) are adjacent to one of the fastest growing regions of Virginia. Dominion's taking additional water from the North Anna River would create future water conflicts with the three downstream counties who will also depend on the North Anna River for water uses while experiencing tremendous growth. The third, water-cooled, unit would constitute the single largest consumptive water withdrawal ever considered in the history of the Virginia Water Protection Permit Program. The Department of Water Resources has stated that, if Dominion wants to build a water-cooled reactor, it should pursue the alternative site at Surry, Virginia, which has an unlimited supply of water. Dominion has continued to ignore the Surry alternative or the alternative of changing the third reactor at North Anna to be air-cooled.

FRIENDS OF LAKE ANNA, VIRGINIA

We have been expressing our concerns to Ms. Ellie Irons, (Coastal Zone Management Act – Impact Review Program Manager) in VDEQ. Ms. Iron's office appears to be fair, impartial, while simply trying to insure that any application for a federal permit is consistent with the U.S. Coastal Zone Management Act. All reports published from her office have indicated that there is inadequate water in the watershed to support a water-cooled reactor at North Anna...

Dominion often states that the early site permit is but the first in a long series of approvals required before the third reactor is actually built. That may be true, but the ESP will establish many design parameters (including the cooling source for the third reactor) and permit the clearing of the land and building of railroad spurs, facility buildings, etc. that will be difficult to change later. Once the train leaves the station, it will become much harder to stop in the future.

We urge you to pay close attention to the facts and the science in this case. Thoroughly investigate any claim or statement by anyone about this proposal (including us), and to avoid being swayed by Dominion's size and power. There are currently 446 nuclear reactors throughout the world. European countries and others have developed other technologies that do not use water as the primary cooling source.

A win-win situation for all is possible. Our country will get more electrical power, while minimizing the dependency on foreign oil. Lake Anna could continue as a great recreational area for over 500,000 people annually. Dominion would get a new nuclear reactor to enhance its profitability. If Dominion simply requests a dry-air-cooled third reactor.

We request that the U.S. Dept of Commerce, National Oceanic and Atmospheric Administration or the State of Virginia should not issue the permits Dominion needs to proceed with plans for another lake-water-cooled reactor at North Anna. We understand that we are just a small group of 2,100 citizens and that we are facing an enormous and powerful opponent in Dominion. We would rather not have to fight this fight, but we don't want our beautiful lake with 167 subdivisions around the 272 miles of shore land and river to be ruined. We would like you to protect the entire 13,000 acre lake for future generations to come. If the lake and river become less desirable places to visit and live, our property values will plummet. Even if preliminary permits are issued, the public will be so concerned that our property values will sink based just on this news, whether the water-cooled reactor is ever built or not.

If we could have a few minutes of your time, we would like to meet with you to provide additional information. We look forward to your response. We appreciate your consideration.

Sincerely,

Harry Ruth
For the Friends of Lake Anna
C/O 230 Heather Drive, Bumpass, Va. 23024
Phone 540-872-3632 or 540-894-4670

CC: (1) Ms. Ellie Irons, (U.S. Coastal Zone Management Act) Impact Review Program Manager
(via email - elirons@deq.virginia.gov)

(1) National Oceanic & Atmospheric Administration
Office of Ocean & Coastal Resources Management
1315 East-West Highway
Silver Spring, Md 20910