

NORTH ANNA COMMENTS

August 15, 2006

7/12/06
71 FR 39372
W4

To:
Mr. Jack Cushing
Environmental Project Manager for the North Anna ESP Application
U.S. Nuclear Regulatory Commission
Washington D.C. 20555

And

Ms. Ellie Irons
Virginia Department of Environmental Quality
629 East Main St.
Richmond, Virginia 23219

And

Mr. Eugene S. Grecheck
Vice President Nuclear Support Services
Dominion Resources, Inc.
5000 Dominion Blvd
Glen Allen VA. 23060

From:

The Lake Anna Civic Association, LACA
P.O.Box 217
Mineral, Virginia 23117
www.LakeAnnaVirginia.org

Point of Contact:
William M. Murphey
449 Lakeway Rd.
Mineral VA 23117
540 894 0024
murphey2nd@AOL.com

There are over 700 families which are members of The LACA.

The LACA Board of Directors has passed a resolution to present the following remarks and requests to the Nuclear Regulatory Commission and the Virginia Department of Environmental Quality.

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RULES AND DIRECTIVES

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Addr = J. Cushing (Jxcg)

Dominion Nuclear North Anna LLC (Dominion) has been a responsible, good neighbor over the years. The Dominion staff has worked with the LACA on a number of issues to our mutual benefit. Dominion has met with us a number of times with regard to the Early Site Permit to build two additional nuclear reactors, has provided briefings to us, and has answered a number of our inquiries.

Although, as in any group of hundreds of people, we have members with differing opinions, we, as a whole, are strongly in favor of proceeding with the third and fourth units. We have had no fundamental, unanswered concerns relating to the nuclear portions of the units or the accident safety of the total plant.

We believe, however, that there are several correctable adverse effects. We request that the adverse effects be corrected. In fact, the effects relate both to the current and the proposed units. We also recognize that the authority and responsibility to correct these effects are distributed between the NRC, VA DEQ, other Virginia State Agencies, and Dominion Resources, but they are all effects of the power plants. The effects we address are

- Discharge water temperature**
- Lake Level**
- Application of Virginia Law**
- Evacuation**
- Noise**
- Amebic Contamination**

TEMPERATURE. We request that the water temperature at the end of the discharge canal be limited to 104 degrees F. Limit on heat transfer to the Main Lake could remain at Dike 3. There needs to be an effective means of prompt enforcement.

The above might be achieved through a requirement in the Dominion permit under the Virginia Pollution Discharge Elimination System (VPDES).

The temperature issue is a matter of public safety for people swimming in the first Lagoon. As is well documented in hot tub literature, swimming in water temperatures above 104 degrees is life threatening. Thus the temperature should be limited at 104 degrees.

LAKE LEVEL. The third unit will use some lake water through evaporative loss. The current units use a considerable amount of water through evaporative loss. We request that simple, obvious steps be taken to manage the available Lake water to maximize the lake level during times of low rainfall.

RELEASE AT THE DAM. We request that the release over the dam be changed to

Lake above 250 - release not limited

Lake below 250 - release limited to 5 cfs (cubic feet per second)

This change is to make a major improvement of the management and conservation of the very limited flow of water into the Lake. It would keep the Lake at higher levels during periods of low rainfall. This can be implemented through a

provision in the VPDES Permit No. VA005245 currently under review. This limitation will have minimal effect on down stream users due to other stream inflows to the North Anna River below the Lake Anna dam.

USE OF LAKE WATER FOR PUBLIC WATER SUPPLY. We request that Lake Anna not be considered as a source for future municipal water supply.

This is because the stream inflow is too small.

USE OF THE LAKE FOR SEWAGE EFFLUENT. We request that the discharge of sewage effluent into Lake Anna be prohibited.

This is because the flow through Lake is so slow that any sewage effluent will build up over years time. It is technically wrong to apply to Lake Anna the Virginia discharge criteria which are based on a flowing stream. Any sewage effluent should be discharged downstream from the Lake Anna Dam.

APPLICATION OF VIRGINIA LAW.

APPLICATION OF MONITORING AND REGULATION. The Agencies of the State of Virginia apply a number of regulations to public water bodies. There are regulations which relate to the health, safety, and welfare of the citizens living around and recreationally using public water. We request that the State Agencies be legally required to apply these health and safety regulations to the Cooling Lagoons.

There are many State regulations which effect the people and which do not effect the operation of the plant. We request that the people have the protection and benefit of these health, safety, and welfare regulations. At the present time, because the Cooling Lagoons are not public water, the laws may not be applied to protect the health and safety of the people enjoying the Cooling Lagoons. If necessary, variances could be granted for aspects of the regulations which might hinder operation of the plant and which do not endanger the safety, health, or welfare of the people utilizing the Cooling Lagoons.

DESIGNATE THE COOLING LAGOONS AS QUASI PUBLIC WATERS. We request that the cooling lagoons be designated as "quasi public water". This designation would recognize that North Anna Power Plant is unlike power plants in Virginia that discharge heated waters into ocean's or major free flowing rivers. It is unique in that Dominion Resources permits and encourages people to enjoy the recreational use of the water before it is released into the "public waters" of Lake Anna. Changing the designation would require that the State of Virginia treat the Lake Anna Cooling Lagoons as public waters for the purpose of application of Virginia regulations relating to the health, safety, and welfare of the citizens living around and using the Cooling Lagoons.

NOMENCLATURE. We request that the Waste Heat Treatment Facility (WHTF) should be referred to as the "Cooling Lagoons".

Names immediately generate mental images when people hear them. The reference to the clean water in the Cooling Lagoons as "WASTE" in the leading word of WHTF immediately gives a bad and misleading image of the clean water and recreational use of the Cooling Lagoons. The WHTF was referenced in 1970 Virginia Electric Power Company (VEPCO) literature as the "Cooling Lagoons".

We believe that the "Cooling Lagoons" nomenclature is more accurately descriptive of their attractive nature and recreational use.

EVACUATION. We request that VDOT upgrade the roads at the Lake so that they are adequate for the evacuation of the current and expected population. We request that VDOT, Dominion and the Public develop a traffic management plan relevant to evacuation.

The population around the lake has changed in 30 years and the roads and traffic management should reflect this change with regard to evacuation.

NOISE. Noise from the plant should meet the Louisa County Noise Ordinance as measured at adjacent non-Dominion properties. It is recognized that this will be a "white" noise.

PAM. Primary Amebic Meningoencephalitis (PAM) is a rare and usually deadly disease caused by infection with the ameba (a single-celled organism that constantly changes shape) *Naegleria fowleri*. PAM should be tested for and monitored in Lake Anna Main Reservoir and the Cooling Lagoons.

There have been several hundred cases worldwide in the last 30 years, no cases in the 35 year history of Lake Anna, but one case in the State of Virginia. This is a public safety issue.

REQUEST.

The LACA asks that the above requests and recommendations be implemented.

Thank you,



**William M. Murphey
For the Lake Anna Civic Association**