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Date: 8/28/2006 8:49:42 AM
Subject: Comments on SDEIP for Dominion for North Anna Units 3 and 4

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Enclosed are the written comments I have made for the ESP request by Dominion for North Anna unit 3 and 4. Please include these in the Official Public Comments.

Thank you of the opportunity to voice our opinion.

Kenneth Remmers WPOA President

Kenneth Remmers

Federal Register Notice: 71 FR 39372
Comment Number: 29

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**VDEQ Coastal Zone Management Act of 1972
Consistency Certification**

August 28, 2006

Ms. Ellie Irons,
Environmental Impact Review Program Manager
Virginia Department of environmental Quality (VDEQ)
629 East Main Street, Richmond, Va. 23219
(via email to elirons@deq.virginia.gov)

Mr. Jack Cushing
Environmental Project Manager for North Anna ESP Site Application
U.S. Nuclear Regulatory commission (NRC),
Washington D.C. 20555
(via email to JXC9@NRC.GOV and North_Anna_Comments@NRC.GOV)

Subject: Comments on the Federal Consistency Certification and the Draft Supplemental Environmental Impact Statement (EIS) on the Early Site Permit for North Anna Nuclear Power Plant.

Dear Ms. Irons, and Mr. Cushing

My Name is Kenneth Remmers and I reside at 2301 Waterside Drive, Bumpass, VA. My credentials are that I am the Lake Anna Civic Association's (LACA) Water Quality Chairman. I am also the Waterside Property Owners Association (WPOA) President of whom I am representing today.

1. **WPOA.** WPOA is a small community on the reservoir side of Lake Anna near the dam. Our community is in favor of the expansion of the current North Anna Nuclear power plants only if the project is handled in a way so as not to destroy health, safety, and welfare of the current residents, users, and future generation at Lake Anna. Dominion (formerly VEPCO) has been a good steward of the lake over the years. I request that all the environmental issues identified by LACA and FOLA with the addition of two new plants with respect to water, water temperatures, lake level, noise, and health and welfare be resolved; then an NRC Early Site Permit and a VDEQ Federal Consistency Certification can be issued.

2. **Consistency Concerns:**

a) Chemical discharge. Make up water for Dominion's Units 3 and 4 and their Ultimate Heat Sink (UHS) require treatment with biocides, antiscalants and dispersants. What does this do to the water returning to the lake? Not only the thermal impacts, there will be chemical impacts at high water temperatures. Who is looking at "applicable EPA criteria for this? VDEQ VPDES? One must look at the human and aquatic life impacts of this. The use of phosphates could present problems with algae growth. Does Dominion have "chlorophyll a" readings in the cooling lagoons? This will also affect the algae and dissolved oxygen levels.

- b) Transportation. Dominion indicated it would develop and implement a construction traffic management plan. We request that the plan be worked out with the public, VDOT and Louisa County and include in it the current workforce as well as the increased workforce with the new units. The intersection of Rt. 700 and Rt 652 needs to be improved as well as the addition of a full red light.

NRC staff has determined that the transportation network in Louisa County and in the ESP site vicinity is *well developed*. Local officials have stated that this would need to be evaluated prior to the start of the construction. This conflict needs to be resolved now.

- c) Bald Eagle. The Commonwealth of Virginia requires a ¼ mile buffer zone from construction activities for any bald eagle nest. What is the closest DGIF documented nest and how is Dominion going to protect it?
- d) Safety Issue. The SDEIS states cooling tower plums would be 3200ft tall and have a length of 16,000 feet from the tower. Fogging would occur 1000 feet to the south-southeast from the cooling towers. This would direct the fog over the cooling lagoons and reservoir in the direction of the dam. This will present safety issues on the lake and adjoining roads.
- e) Lake Levels. The SDEIS discusses the lake level several times. At the conclusion of their remarks, they always say it is up to the Virginia regulators to decide. Who is making this decision? What state agencies are involved? What is their input? Dominion has stated that they are not considering this possibility. How can the Lake Anna citizens be assured that the lake level will not change from the 250 msl?
- f) Total Dry Cooling. The blowdown and makeup water taken from the Reservoir would be 38.7cfs at 100% power level of unit 3. The discharge over the dam is 40 or 20cfs in a drought. This uses as large a volume of water as is the discharge amount when the lake is at 250 feet or less. Total dry cooling of unit 3 at a 12% expense seems to be the best solution to preserve the little water that is in the watershed.
- g) Noise. The SDEIS states noise from the cooling towers would be less than 65 dB at the boundary. Louisa county ordinance is less than 55db. How can this difference be resolved? The boundary noise should be less than 55db including any noise from the turbine building that is not discussed.
- h) VPDES Permit. The SDEIS states that the new plant can operate to a 242ft lake level and an inlet water temperature of 100F. This temperature far exceed the variance set by the VDEQ in their VPDES permit. Current NAPS 1 and 2 can operate up to an inlet temperature of 95F. Real temperature limits need to be set. The 316(a) study does not address these high temperatures. Thermal limits cannot be just the heat rejected from the cooling lagoons to the reservoir as the amount calculated with all reactors running at full power. The VDH needs to put some limitation on the temperature of the water at the exit of the power plant. Currently record high temperatures have been seen all around the lake. This trend will not go away with the addition of the unit 3. It will only get worst.

- i) Use of Sprayers to Cool Peak Temperatures. I suggest that Dominion, NRC, and VDEQ look into sprayer located in the discharge canal as a means of reducing the peak temperatures of the discharge water. These sprayers would be used only during the hot days of the summer. Currently the existing NAPS units 1 and 2 employ sprayers in their Ultimate Heat Sink (UHS). These existing sprayers are periodically turned on. Dominion can evaluate the effectiveness of the sprayers with available data or data they can easily obtain. DEQ could use this data to evaluate the need for this in the VPDES permit.

- j) SER. The SER or the Supplemental SER has not been evaluated by the public or by VDEQ. This document may contain information pertinent to the CMA and its evaluation. The Supplemental SER just came out August 15, 2006 and is not on the NRC ADAMS website. We have requested a hard copy from NRC. We recommend that VDEQ review this document for information affecting the consistency certificate.