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HANOVER COUNTY
DEPARTMENT OF PUBLIC UTILITIES
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September 12, 2006

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

7/12/06
71FR 39372
W19

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SEP 19 PM 3:24

RULES AND DIRECTIVES

Re: Dominion Nuclear North Anna, LLC
Supplement to the Draft Environmental Impact Statement for an Early
Site Permit

Dear Chief, Rules and Directives Branch:

This letter represents the comments of the Hanover County Department of Public Utilities (County) on the Supplement to the Draft Environmental Impact Statement (SEIS) for the Early Site Permit. The draft Environmental Impact Statement (EIS) and SEIS fail to address all of the January 7, 2004 comments and back-up information submitted by the County. The impact on the County's wastewater treatment plant as well as those of the other Doswell industrial dischargers is not addressed nor is the information from prior State Corporation Commission meetings indicating the existing 40 cfs minimum release would have adverse environmental impacts. The County remains concerned with the increased frequency of the low flow conditions and the impact on downstream users, which the draft SEIS classifies as moderate during drought conditions and small during normal conditions. Any reduction in flow will have an adverse impact on the County and Bear Island Paper due to the unique nature of the Doswell Wastewater Treatment Plant VPDES Discharge Permit, which is tied to flow in the North Anna River.

The draft SEIS also mischaracterizes the potential future County water supply alternatives. The information submitted by Dominion indicated the County considered multiple water supply options and retained two in the Comprehensive Plan. What was not mentioned was that one of the rejected options was a run-of-the-river withdrawal,

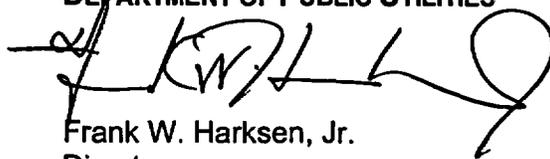
SONSI Review Completed
Template = ADA-013
Hanover: People, Tradition and Spirit *F-REDS = ADA-03*
Case = J. Covington (JXC9)

Chief, Rules and Directives Branch
Supplement to the Draft Environmental Impact Statement
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which appears to be the option evaluated in the SEIS¹ since it equates the potential future County withdrawal with the Lake Anna minimum releases. The alternatives included in the County's Comprehensive Plan, and addressed in more detail in the County's Long-Range Water Resources Planning Study, both include the use of a quarry for off-stream storage, with pumping to the quarry to be done during high flow conditions. Thus the comparison to minimum releases is not relevant. A more helpful evaluation would be the affect on mean annual flow in the North Anna River and its safe yield so the impact on the off-stream storage option can be evaluated.

Thank you for this opportunity and please include the Hanover County Department of Public Utilities on your interested parties list.

Sincerely,
DEPARTMENT OF PUBLIC UTILITIES

A handwritten signature in black ink, appearing to read 'F. W. Harksen, Jr.', written over a horizontal line.

Frank W. Harksen, Jr.
Director

Enclosures

cc: The Hanover County Board of Supervisors
Mr. Cecil R. Harris, Jr., County Administrator
Mr. Sterling E. Rives, III, County Attorney
Mr. John H. Hodges, Deputy County Administrator

¹ SEIS Section 5.3.2 (also in 7.3) "To meet its future projected demand, Hanover County proposes to withdraw 1.3 m³/s (46 cfs) from the 30 North Anna River (Dominion 2005a). However, this diversion target withdrawal exceeds the 1.1 m³/s (40 cfs) minimum discharge limit currently specified in the North Anna Lake Level Contingency Plan