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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Docket No. 52-011-ESP

March 9, 2007

VIA FACSIMILE AND U. S. MAIL

Office of the Secretary
Rulemakings and Adjudications Staff
U.S. Nuclear Regulatory Commission
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Administrative Judge G. Paul Bollwerk, III
Atomic Safety and Licensing Board Panel
Mail Stop T-3F23
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001
Fax: (301) 415-5599

**RE: Limited Appearance Statement to NRC Concerning the Early Site Permit for
Southern Nuclear Operating Company's Vogtle ESP Site**

Dear Judge Bollwerk:

The Georgia Water Coalition ("GWC" or "the Coalition") wishes to submit the following comments concerning the proposed expansion of Plant Vogtle and its effects on the Savannah River. The GWC is composed of 144 conservation, recreation, evangelical, civic and business organizations and represents hundreds of thousands of Georgians; a list of member organizations is attached to this letter. The Coalition is dedicated to the protection of water quality and water resources throughout the state. We have serious concerns about the implications of the expansion of Plant Vogtle on the water quality and stream flow of the Savannah River and its tributaries. Additionally, four of our member groups including Atlanta WAND, Center for a Sustainable Coast, Savannah Riverkeeper, and Southern Alliance for Clean Energy have filed a petition to intervene that raises several important water-related issues.

We are concerned about the adequacy of the existing Environmental Report and ask that the Nuclear Regulatory Commission conduct a thorough environmental review of the direct and cumulative impacts of the proposed expansion on the Savannah River's ecology and on the local economies of downstream communities. Cumulative impacts should include the incremental impacts of the new units combined with impacts from the existing units and other current and proposed water withdrawals and discharges in the Savannah River Basin. The City of Savannah and other downstream communities will likely be relying on more surface water from the river for water supply because of ongoing concerns with saltwater intrusion into the underlying Floridan Aquifer, so any additional consumption of water upstream, or degradation in water quality, must be minimized.

SECY-02

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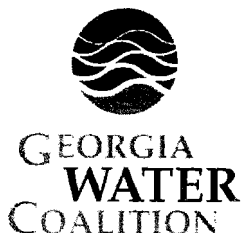
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Furthermore, the river harbors a large array of aquatic species, including several endangered species, so evaluating both the direct impacts of the project (species entrainment, changes in local water quality) and cumulative impacts (changes in streamflow and assimilative capacity throughout the basin) is paramount. Specifically, the Environmental Report must account for the impacts of the expansion on the downstream Savannah National Wildlife Refuge, which requires clean freshwater inflows in order to remain healthy. The Savannah Harbor already has a Total Maximum Daily Load in place for dissolved oxygen, and the proposed expansion must be examined carefully to assess any potential for exacerbation of this serious pollution problem, particularly in conjunction with the planned deepening of the harbor. Generally, the river system is already under significant stress because of its dwindling assimilative capacity. An objective, scientifically-based analysis of less damaging alternatives is therefore required. Finally, public access to information must be provided as the permitting process goes forward.

Thank you for your acceptance and consideration of these comments. We look forward to continuing to monitor this significant project as it moves forward.

Sincerely yours,

Georgia Water Coalition



Georgia Water Coalition Partners

Altamaha Riverkeeper
American Rivers
American Whitewater
Athens Grow Green Coalition
Athens Land Trust
Atlanta Audubon Society
Atlanta Chapter, U.S. Green Building Council
Atlanta WAND (Women's Action for New Directions)
Atlanta Whitewater Club
Azalea Park Neighborhood
Bear Creek Bass Club
Benjamin E. Mays Center, Inc.
Berkeley Lake Homeowners Association
Bike Athens
Blue Heron Nature Preserve
Broad River Outpost
Broad River Watershed Association
Brook Trout Limited
Burnt Fork Watershed Alliance
Camden County Land Trust
CCR Environmental
Center for a Sustainable Coast
Central Savannah River Land Trust
Chattahoochee Hill Country Conservancy
Chattahoochee Nature Center
Chattahoochee River Watch
Chattooga Conservancy
Cherokee Homeowners
Citizens for Clean Air and Water
Citizens for Environmental Justice
Clean Coast
Coastal Environmental Organization of Georgia
Coosa River Basin Initiative
DeKalb County Soil & Water Conservation District
Earthkeepers & Company
East Atlanta Community Association
Ens & Outs, Unitarian Universalist Congregation of Atlanta
Environment Georgia
Foundation for Global Community, Atlanta Chapter
Friends of Georgia, Inc.
Friends of McIntosh Reserve
Friends of the Apalachee
Friends of the Chattahoochee
Friends of the Savannah River Basin
Garden Club of Georgia, Inc.
Georgia Bass Chapter Federation
Georgia Canoeing Association, Inc.
Georgia Center for Law in the Public Interest
Georgia Coalition for the People's Agenda
Georgia Coalition of Black Women
Georgia Conservancy
Georgia Conservation Voters
Georgia Council Trout Unlimited
Georgia Environmental Organization
Georgia Erosion Control Center (GECC)
Georgia ForestWatch
Georgia Interfaith Power and Light
Georgia Kids Against Pollution
Georgia Lakes Society
Georgia Land Trust
Georgia Legal Watch
Georgia Onsite Wastewater Association
Georgia Poultry Justice Alliance
Georgia River Fishing
Georgia River Network
Georgia River Survey
Georgia Rural Urban Summit
Georgia Wildlife Federation
Georgians Against Nuclear Energy (GANE)
Glynn Environmental Coalition

Green South Fulton
Hiwassee River Watershed Coalition
Hollanta Adventures
Hydro Management Systems
Interface, Inc.
Intrenchment Creek Coalition
Jackson Lake Homeowners Association
Junior Bass Busters
Knottalotta Entertainment
LaGrange Boaters, Anglers, Campers Association
Lake Allatoona Preservation Authority
Lake Blackshear Watershed Association
Lake Hartwell Association
Lake Lanier Homeowner's Association
Lake Oconee Property Owners' Association
Lake Oconee Water Watch
League of Conservation Voters Education Fund
League of Women Voters of Georgia
Legal Environmental Assistance Foundation
Long Island Creek Watershed Preservation Assn
Lumpkin Coalition
Melaver, Inc.
Middle Georgia Advisory Group
Minds Eye Scenic Arts
Mountain Park Watershed Preservation Society, Inc.
National Wildlife Federation
Neighborhood Planning Unit - W, Atlanta
Netlink IP Communications
New Echota Rivers Alliance
Nickajack Watershed Alliance
Norris Lake Community Benefits Corporation
North Georgia Trout Online
Ocmulgee Riverkeeper
Oconee River Land Trust
Ogeechee Audubon Society
Ogeechee - Canoochee Riverkeeper
Peavine Watershed Alliance
Physicians for a Social Responsibility Atlanta
Presbytery of Greater Atlanta
Rain Harvest Company, Inc.
Refashion Network, Inc.
REP America- Georgia Group
Ridgeview Neighborhood Civic Association
Satilla Riverwatch Alliance, Inc. & Satilla Riverkeeper
Santee-Nacoochee Community Association
Savannah-Ogeechee Canal Society, Inc.
Savannah RiverKeeper
Save Lake Oconee's Waters (SLOW)
Save Our Rivers, Inc.
Save Our Satilla
Sierra Club- Georgia Chapter
Small Carpenters at Large
Soque River Watershed Association
South Atlantans for Neighborhood Development
Southeastern Natural Sciences Academy
Southern Alliance for Clean Energy
Southern Environmental Law Center
Southface
SouthWings: Conservation through Aviation
Spring Creek Watershed Partnership
Sustainable Business Partners
T-Shirt Construction Co.
Turner Environmental Law Clinic
Unicoi Outfitters
United Nations Association - Atlanta Chapter
Upper Chattahoochee RiverKeeper
Upper Little Tennessee Watershed Association
Upper Oconee Watershed Network
Upper Tallapoosa Watershed Group
Vegetarian Solutions
West Atlanta Watershed Alliance
West Point Lake Advisory Council
West Point Lake Coalition
Wilderness Society

February 20, 2007 - 144 Partners

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