RICH-AS PROMISED DAN MARX 3-7-07

From: "Daniel J. Marx, Ph.D." <djmarx@sover.net> Subject: Re: Vermont Yankee: Draft GEIS: comments Date: March 6, 2007 5:28:37 PM EST To: Richard Emch <RLE@nrc.gov>

12/21/06 11FR 76706

Richard.

weet -

Got your phone message and tried to call you about 5:15PM. Got your voice mail.

1. Re: "85°F" in my e-mail of March 2 to Dr. Masnik.

This is issue is NOT raised in the Draft GEIS as far as I remember. But it IS an issue between the VT Agency of Natural Resources, who issues the NPDES Permit, and VY. The VT Agency wants a limit (85°F) and VY opposes it. I agree with the Agency. I may be in error raising the issue with the NRC.

2. The CD-R disc you have found attached to my written presentation given to Dr. Masnick on Jan 31 is nothing more than my presentation on disc.

Let me know if you need more clarification.

Sorry for the confusion.

Dan Marx

Daniel J. Marx, Ph.D. DJM-PHD Sound Recording, Daniel Marx Photography, Marx Environmental 721 Park Laughton Rd. E. Dummerston, VT 05346-9580 USA (802)257-1121

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From: "Daniel J. Marx, Ph.D." <djmarx@sover.net>
Subject: Re: Vermont Yankee: Draft GEIS: comments
Date: March 5, 2007 5:16:45 PM EST
To: Richard Emch <RLE@nrc.gov>
Cc: "Masnik, Michael T., Ph.D." <mtm2@nrc.gov>



Mr. Emch:

My comment of March 2 in my e-mail to Dr. Masnik is NOT in my presentation of January 31 at Brattleboro and I request to have it on the record.

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RE: setting an upper MIXED river temp limit of 85°F at down-river 'Station 3' during the summer period mid May to Mid October.

Sincerely,

Daniel J. Marx, Ph.D.

Daniel J. Marx, Ph.D. DJM-PHD Sound Recording, Daniel Marx Photography, Marx Environmental 721 Park Laughton Rd. E. Dummerston, VT 05346-9580 USA (802)257-1121 and the second second

From: "Daniel J. Marx, Ph.D." <djmarx@sover.net>
Subject: Re: Vermont Yankee: Draft GEIS: comments
Date: March 2, 2007 9:46:35 PM EST
To: "Richard Emch" <RLE@nrc.gov>
Cc: "Masnik, Michael T., Ph.D." <mtm2@nrc.gov>



Rich,

The attachment is a document made with AppleWorks 6.2.9 on my Mac G5 desktop running Mac OS 10.4.3.

It is the document I gave to several of you as a hardcopy at the public meeting on January 31 in Brattleboro.

I was the Vermont Yankee in-house 'senior scientist' (biologist) between 1972 and 1996, the year I retired.

The substance of my comment on the Draft GEIS is in the body of the e-mail message itself.

Dan Marx

Daniel J. Marx, Ph.D. DJM-PHD Sound Recording, Daniel Marx Photography, Marx Environmental 721 Park Laughton Rd. E. Dummerston, VT 05346-9580 USA (802)257-1121

From: "Daniel J. Marx, Ph.D." <djmarx@sover.net> Subject: Vermont Yankee: Draft GEIS: comments Date: March 2, 2007 12:29:20 PM EST To: "Masnik, Michael T., Ph.D." <mtm2@nrc.gov>



1 Attachment, 23.9 KB (Saver)

Dear Dr. Masnik:



070131-DJM...wk (23.9 KB) It was a pleasure meeting you at the public meeting in Brattleboro on January 31.

I have reviewed the "Aquatic Resources" sections of the Report and agree with the conclusions that the environmental impact of VY operation on aquatic biota and the overall aquatic ecosystem of the Connecticut River would be, in the language of the Report, 'small'. (The term that I use is 'negligible'.) I believe that the requirements of US EPA Sections 316a and 316b have been met.

I do, however, have ONE recommendation:

In recognition of the uncertainties of the local effects of increasing climate change, so-called global warming', it would be prudent to place (for the period May 16-October 14) a figure on ambient river temperature (measured at up-river Station 7) ABOVE which the plant should operate in a cooling mode which would result in NO increase in the mixed river temperature measured at down-river Station 3, ABOVE the number measure at Station 7.

I believe that the State of Vermont (relative to the NPDES Permit) has proposed 85°F. The exact details could be worked-out between the three state's members on the Vermont Yankee "Environmental Advisory Committee" (re: NPDES Permit) and Vermont Yankee. I would note that there already is such a limit (65°F) in effect for the winter period of October 15-May 15.

Historical data collected by Aquatec, Inc. between 1967 and 1995 have shown that ambient river temperatures rarely exceeded the low-mid 80°F range. However, global warming could push those temperatures higher in the future.

If you have questions, please do not hesitate to e-mail me.

I am attaching the text of the five-minute presentation that I made at the public meeting on January 31.

Sincerely,

Daniel J. Marx, Ph.D.

Daniel

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Dr. Daniel Marx, verbal presentation before the US NRC, 1/31/07, Brattleboro, VT: Aquatic Environmental Impact of the Vermont Yankee Nuclear Power Station.

My name is Dan Marx. I live in Dummerston, the next town north up the road. I am a member of the Vermont Energy Partnership.

For 24 years, from 1972 to 1996, I was the chief biologist at Vermont Yankee. I retired from Vermont Yankee in 1996. I came to Vermont Yankee from the University of Minnesota with a Ph.D. in Zoology. In Minnesota, I had some prior experience with aquatic environmental monitoring at the Monticello and Prairie Island nuclear plants, both on the Mississippi River. I also worked with large coal-fired generating plants.

With Vermont Yankee, my primary function, from Day-One, was the day-to-day management and implementation of the aquatic environmental monitoring program on the Connecticut River. My responsibilities included the sampling, monitoring, and surveillance of a large number of parameters. Near the very top of the list was temperature of the river at many fixed locations in the river and of plant discharge cooling water. I was also responsible for the management and maintenance of the environmental discharge permit, issued by the State of Vermont, the so-called NPDES Permit: "National Pollutant Discharge Elimination System"-- a permitting system driven by the Federal Clean Water Act and the EPA.

I spearheaded the renewal of the Discharge Permit every 5-years. I also guided two, EPA combined 316(a) and 316(b) "Demonstrations", which resulted in alternate thermal discharge criteria being permitted under very specific conditions of river flow and temperature to adequately protect river biota.

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During my 24-year tenure, all of the data collected from the river, with associated analysis and interpretation, was conducted for Vermont Yankee by the environmental consulting firm AQUATEC, Inc. out of South Burlington, Vermont. Vermont Yankee and Aquatec actually began the studies pre-operationally in 1967, before I was on the scene. From 'Day-One', the early environmental program was crafted with consultation and input from the state environmental agencies from VT, NH, and MA. In the very early days, up to about 1972 or '73, the Atomic Energy Commission, now the NRC, was also on board in crafting the studies. The programs always remained flexible with an eye to modification as might be required in the future. Incidentally, it was also in 1967, that the New England States which "host" the Connecticut River announced a long-term program to attempt to restore the Atlantic Salmon to the River, with the collaboration of the US Fish and Wildlife Service.

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The area of the river included in the Vermont Yankee study zone extends from up-river in Brattleboro where the West River enters..... to the south, down-river at the old, abandoned Shell Bridge at Northfield, Massachusetts. This 26 mile stretch of river is, without question, the most intensively and extensively studied section of the entire river.

In conclusion, during my 24-year tenure (1972 to1996) in charge of the Vermont Yankee river studies, it is my professional judgement that it has been adequately demonstrated that Vermont Yankee's impact on the ecosystem of the River has been "NEGLIGIBLE"----Not

Zero, but negligible, very low.

Vermont Yankee has been a very low environmental impact, base-load, (24/7), producer of a major portion of Vermont's electrical energy. It deserves to be a part of Vermont's energy future, along with green, re-newables: hydroelectric, wind, solar, bio-mass, and conservation. Let's get off all fossil fuels to generate electricity!!