From: <Gregory_Hogue@ios.doi.gov>
To: <VOGTLE_EIS@nrc.gov>
Date: 12/3/2007 12:51:29 PM
Subject: DEIS Vogtle Electric Generating Plant Site

Please accept the attached comments. These are in additional to comments previously submitted.

Gregory Hogue
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United States Department of the Interior

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9043.1

December 3, 2007

Chief, Rules, Directives and Editing Branch
U.S. Nuclear Regulatory Commission
Mail Stop T6-D59
Washington, DC 20555-0001

RE: Draft Environmental Impact Statement for an Early Site Permit at the Vogtle Electric Generating Plant Site

The Department of the Interior previously submitted comments to the referenced draft environmental impact statement (DEIS) on November 27, 2007. We have the following comments to provide for your consideration.

Channel Dredging. The document does not address dredging of the Savannah River channel that is likely needed to move required construction material up the river from Savannah harbor to the site. The U.S. Corps of Engineers, Savannah District (USACE) has not maintained the Savannah River below Augusta, Georgia for navigation since the late 1970's. According to the USACE, previous barge shipments to Barnwell for reactor disposal required a discharge of between 10,000 cfs and 15,000 cfs in December of 2004. Vogtle construction will likely require many shipments (15-30) and it would be impossible to plan and provide that many shipment windows with releases that are incidental to flood control or pulse flow releases; therefore, it appears dredging of the Federal navigation channel would be required.

The channel dredging would be a major impact of the project and, if it is necessary for construction, needs to be disclosed and thoroughly evaluated in the DEIS. Channel dredging would likely impact mussel beds because the beds are found in the sediment deposition areas where there is some protection from scouring flows occurring in the main channel. Habitat for fish and other aquatic organisms would also be impacted.

Dredging the river will have direct impacts on freshwater mussels by: (1) physical removal of the animals with the dredge spoil, (2) alteration of habitat, including eliminating sediment bars and removal of debris and other in-stream structures that provide refugia from scouring high-water flow, (3) alteration of habitat for fish spawning, potentially reducing numbers of host fish available for successful mussel reproduction, and (4) depending on the site selection for spoil

disposal, potential degradation of backwater slough or oxbow habitat, which supports a variety of mussel species.

Page 5-6. The USACE Savannah River drought plan only specifies a maximum discharge. In other words, Level 1 specifies a maximum weekly average of 4,200 cfs and Level 2 a maximum weekly average of 4,000 cfs. The only minimum discharge requirement is the daily average of 3,800 cfs, which applies in drought or non-drought. Therefore, the weekly average discharge can frequently be about 3,800 cfs during levels 1 and 2, depending on hydropower needs. Furthermore, the USACE has implemented a modification to the drought plan which reduces the daily average to 3,600 cfs during severe drought and is currently considering further flow reductions. The drought plan discussion needs to be modified to clarify the flow requirements and the withdrawal percentages need to be recalculated. In addition, Drought Level 4 needs to be evaluated using information on reservoir inflow which is available at the USACE web site.

Page 4-27. The robust redhorse is a state-listed species but not federally-listed. The multi-agency Robust Redhorse Conservation Committee (Georgia Power is a member) was formed in 1995 to determine why the fish had declined and to restore the species to a sustainable level without the need to be listed under the Federal Endangered Species Act. No known spawning occurs within the Vogtle project area; however, there is little doubt that the species moves through this river stretch during spawning.

Page 4-28. This document discusses mussel fauna in the project area and states the Atlantic pigtoe (*Fusconia masoni*) is not known to occur in the Savannah River. In 2006, the U.S. Fish and Wildlife Service conducted a freshwater mussel survey in the Savannah River to determine species composition and distribution of mussels. This study encompassed the portion of the river from the Augusta Shoals region (RM 203) near the Fall Line downstream to the tidewater region (RM 22.8) near Savannah. The survey evaluated 39 sites using both shallow water (snorkeling and grubbing) and deep water (SCUBA) survey techniques. A total of 26 freshwater mussel species were identified during the survey efforts. With the exception of sites within the Augusta Shoals area, mussels were generally unevenly distributed in the surveyed areas, which is reflective of the distribution and quality of microhabitats within a particular river segment. In general, mussels were most abundant in the thalwag habitats at the base of the river bank, and rare to absent in the shifting sand dominated runs in the center of the channel.

Atlantic pigtoe and Savannah liliput (*Toxolasma pullus*) were observed in the 2006 mussel survey. Both of these species are experiencing range-wide declines and are likely to be elevated to candidate status within the next two years. The population of Savannah liliput upstream of Little Hell boat landing (Allendale County, South Carolina) is probably the largest remaining population of this species and impacts to that habitat should be avoided.

The 2006 discovery of four species not previously known to occur in South Carolina demonstrates the gross lack of knowledge regarding the mussel fauna of the Savannah River. The objective of the 2006 mussel survey was to attempt to estimate species composition and distribution in the Savannah River; however, it should be noted that time and funding restrictions allowed surveyors to visit only a small portion of the available habitat in the river.

Page 4-29 & 4-30. No red-cockaded woodpeckers (RCW) were located on the plant site. The closest active RCW group is located on the DOE Savannah River Site approximately ten miles

from the Vogtle site. However, the DEIS mentions a Red-Cockaded Woodpecker Safe Harbor Agreement signed in June of 2007 in cooperation with the Georgia Department of Natural Resources and Georgia Power/Southern Nuclear. This agreement includes the Plant Vogtle site and will in the future maintain and enhance habitat for the RCW at this location.

Thank for the opportunity to review this document and submit these additional comments. If you should have any questions or concerns about these comments please contact Strant Colwell of the Fish and Wildlife Service, Georgia Ecological Services Office at 912-265-9336, or Ed Eudaly of the Charleston, South Carolina Ecological Services Office at 843-727-4707. I can be reached at 404-331-4524 if you have any questions.

Sincerely,

Gregory Hogue
Regional Environmental Officer

cc:
OEPC, Washington

REFERENCES

Clarke, John S. and West, C.T., 1998, Simulation of Ground-Water flow and Stream-Aquifer Relations in the Vicinity of the Savannah River Site, Georgia and South Carolina, Predevelopment Through 1992: U.S. Geological Survey Water-Resources Investigations Report 98-4062, 134 p. Available on the Internet at: http://pubs.usgs.gov/wri/wri98-4062/

Cherry, Gregory S. and Clarke, John S., 2007, Simulation and Particle-Tracking Analysis of Selected Ground-Water Pumping Scenarios at Vogtle Electric Generation Plant, Burke County, Georgia, U.S. Geological Survey Open-File Report 2007–1363, 51 p. Available on the Internet at: http://pubs.usgs.gov/of/2007/1363/

Thank you for the opportunity to review and comment on this DEIS. If you have any questions concerning our comments, please contact Lloyd Woosley, Chief of the USGS Environmental Affairs Program, at (703) 648-5028 or at lwoosley@usgs.gov.

Copy to: Office of Environmental Policy and Compliance