



November 26, 2007

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration
Mailstop T-6959
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

9/14/07
72FR 52586

(9)

RECEIVED

2007 DEC -4 AM 10:18

RULES AND DIRECTIVES
BRANCH
USNRC

RE: Comments on the Draft EIS for the Vogtle Early Site Permit

Dear Sir:

The City of Savannah is formally submitting comments on the draft Environmental Impact Statement for the Plant Vogtle early site permit for the proposed two additional reactors. We are aware that there are competing interests in resolving the nationwide problem of oil dependency, global warming and the development of alternate energy sources. The City of Savannah will not take sides in this debate. However there are several concerns that we consider critical to the economic development and public safety in the Savannah region. These concerns are water quantity and water quality which are discussed below:

Water Quantity

The City of Savannah relies on two major sources of water for our citizens, industrial and commercial customers, and inter-governmental sales contracts. Historically, the Savannah region has relied on groundwater to meet existing needs and provide for future growth. These demands on the primary aquifer have resulted in saltwater intrusion in certain wells on Hilton Head, South Carolina. South Carolina has demanded that Georgia reduce groundwater pumpage in order to prevent further deterioration of wells and possibly reverse the flow of the saltwater intrusion. South Carolina in turn reduced groundwater withdrawals by 35%. The Savannah area has reduced groundwater by 10 MGD and will be required to further reduce withdrawals by 10%. The state Environmental Protection Division (EPD) has strongly recommended more reliance on surface water to meet future needs. In order to meet future needs, Savannah has spent millions of dollars to expand surface water treatment and to install infrastructure to deliver the water into the system.

SOWSI Review Complete
Template = ADM-03

E-RFDs = ADM-03
Adm = M. Nish (mdn)
C. Guerrero (@X93)

As noted in our review of the draft EIS, the water analysis is not adequate. The recent drought has exacerbated the problem as flows in the Savannah River have been reduced to 3600 cfs and there are further discussions to reduce the flows below 3600 cfs to maintain water levels in upstream reservoirs. It is disconcerting to note that water lost to steam and unavailable for return to the Savannah River amounts to in excess of 75,000,000 gpd from operation of the existing and proposed new reactors.

Water Quality

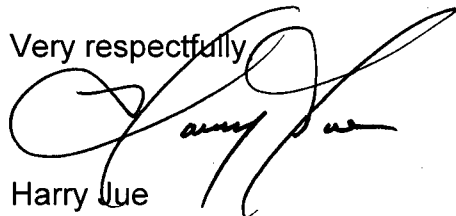
Increasing consumptive use of water in the Savannah River Basin during low flow periods could contribute to other water quality risk. Of particular concern to Savannah's water supply is the flow of saltwater moving upriver as river flows decrease. This situation will also be exacerbated by the proposed deepening of the Savannah Harbor from 42 feet to 48 feet. This saltwater conduit, low flows from reservoirs, consumptive use upstream, extreme astronomical tides and northeast winds could virtually shut down Savannah's raw water intakes located at Mile 29 on the Savannah River.

Low flows will also affect the river's ability to disperse contaminants present in the river. Savannah's water supply is already at risk due to operations of the Savannah River Plant and existing operations at Plant Vogtle. Concentration of these contaminants due to low flows places public safety at risk due to the unavailability of water treatment technology to address these problems.

In summary, a water supply and demand model should be developed for the entire Savannah River Basin that takes into account variable drought intervals, lengths, and severity along with increasing water demand from population growth and economic development. In addition to water supply and demand, future increased demand for more assimilative capacity in the Savannah River should be included which will address water quality of downstream users. Changes in assimilative capacity will, of course, affect acceptable levels for minimal flows. In turn, energy technology choices and growth management decisions should be tailored accordingly to accommodate projected constraints in the Savannah River Basin.

I appreciate the opportunity to comment on this most important issue.

Very respectfully,



Harry Lue
Water and Sewer Director

Cc: Michael Brown, City Manager
John Sawyer, Water Supply Director
Laura Walker, Environmental Services Coordinator
2007letter/comments on draft EIS Vogtle Early Site Permit