From: Stacey Kronquest <stacey@kronquest.com>
To: <VOGTLE_EIS@nrc.gov>
Date: 12/28/2007 5:41:16 PM
Subject: Comments on Vogtle DEIS

Please find attached the Savannah Riverkeeper's comments for the Early Site Permit for Plant Vogtle.

Thank you,

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Federal Register Notice: 72 FR 52586
Comment Number: 81

Mail Envelope Properties (477DF3DB.HQGWDO01.TWGWPO04.200.2000004.1.109392.1)

Subject: Comments on Vogtle DEIS
Creation Date: 12/28/2007 5:41:16 PM
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Recipients
<VOGTLE_EIS@nrc.gov>

Post Office	**Route**
TWGWPO04.HQGWDO01	nrc.gov

Files	**Size**	**Date & Time**
MESSAGE	265	12/28/2007 5:41:16 PM
SRK VogtleESP Comments.pdf	95190	1/4/2008 8:52:43 AM
Part.002	4	1/4/2008 8:52:43 AM
Mime.822	132532	1/4/2008 8:52:43 AM

Options
Priority: Standard
Reply Requested: No
Return Notification: None
None

Concealed Subject: No
Security: Standard

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December 28, 2007

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

E-mail: Vogtle_EIS@nrc.gov

RE: Savannah Riverkeeper Comments on the Draft Environmental Impact Statement for the Plant Vogtle Early Site Permit

Dear NRC Staff:

Savannah Riverkeeper is a non-profit organization with offices in Savannah and Augusta and members throughout Georgia. Our mission is to protect the water quality of the Savannah River and the integrity of its watershed, and promote an enlightened stewardship of this unique heritage. We disagree with the Nuclear Regulatory Commission (NRC) recommendation in the draft Environmental Impact Statement (EIS) that supports approval of the early site permit to expand nuclear Plant Vogtle.

Given that much of Georgia is in a Level 4 drought, and the Savannah River Basin is hovering between a Level 2 and 3 drought, it is imperative that NRC conduct an analysis of the effects of VEGP 3 and 4 in a Level 4 drought. "Unfortunately, we expect the reservoirs to continue to fall until precipitation patterns change," said Jason Ward, a hydrologist with the Army Corps of Engineers. "Most streams in the Savannah River Basin with long term records are below five percentile flow levels and some gages are setting new all time lows."

A Level 4 Drought is probable and needs to be analyzed by the NRC before granting the largest water user in the basin permission to double its take. A Level 4 Drought will have substantial effects on the river's ability to assimilate and dilute both thermal pollution and chemical waste. The downstream users must know what those effects will be before an Early Site Permit is granted to Southern Company.

In Sect. 5.9.1 it is reported "Drinking water was not evaluated because the current land-use census 7 showed no drinking water use of the river within 160 km (100 mi) downstream of the site." The NRC has stated that it will assess effects on human health from radioactive effluent releases, and part of doing so is evaluating the drinking water of users downstream. Beaufort-Jasper Water Authority is just 109 miles downstream from Plant Vogtle and serves tens of thousands of customers. Given that radioactive material cannot be remediated from drinking water or dissipate quickly, evaluation should be conducted for the entire downstream drinking water users. The Savannah River is already contaminated with radionuclides by SRS, so a drinking water evaluation should be part of the Cumulative analysis of the effects the Vogtle expansion will have on the water quality.

In Sect. 5.7.3, the NRC states, "The addition of the proposed VEGP Units 3 and 4 is not expected to significantly increase the level of radioactive contamination in the Savannah River. Therefore, while subsistence consumption of fish species from the Savannah River may be a health problem for minority and low-income populations, it is not attributable to the existing reactors and cannot be reasonably projected to be exacerbated by the addition of two more reactors at the site."

There was no analysis in the DEIS of the projected radiological releases from VEGP Units 3 and 4, so it is an assumption only to say, "there were no operations-related disproportionate and adverse impacts on minority or low-income populations related to subsistence."

An Institute for Energy and Environmental Research (IEER) report finds that African Americans who rely on the Savannah River as a primary source of protein -- that is, subsistence fishermen -- are disproportionately affected by the consumption of radioactively-contaminated fish."

This is an environmental injustice, and further contribution to it from VEGP 3 and 4 must be, at the very least, addressed in an evaluation of the amounts of radioactive material that is likely to bioaccumulate in fish consumed by African American subsistence fishermen.

Additionally, it is becoming increasingly clear that an inter-basin transfer from the Savannah River to Atlanta is in the future. This coupled with record-setting droughts must be analyzed in The Cumulative Impacts on users downstream who are, as saltwater intrudes the Upper Floridan Aquifer, looking to the Savannah River for water needs. The decreased flow from an inter-basin transfer and a level 4 Drought would concentrate the radioactive waste discharged into the river. This must be analyzed in the Cumulative Impacts as well.

Thank you for your acceptance and consideration of these comments to the Plant Vogtle Early Site Permit.

Respectfully submitted,

Stacey Kronquest
Savannah Representative
Savannah Riverkeeper