

From: STP_COL
To: <STP_COL@nrc.gov>
Date: 1/17/2008 10:04:17 AM
Subject: Fwd: STP Environmental Report Issues

>>> Paul Kallan 10/24/2007 11:28 AM >>>
Hi Greg and Bill:

I hope all is well. As promised, I am sending you comments that are representative of issues we are having with the Environmental Report. There are five sub-headings and under each sub-heading are examples that are referenced with specific chapter and section. I am attaching the comments in a word document.

The brideline for tomorrow is: 1-800-638-8081. The passcode is: 1792#. I have the brideline from 10:55 am - 12:30pm.

I look forward to our discussion tomorrow.

Sincerely,

Paul Kallan

Hearing Identifier: SouthTexas34Public
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Subject: Fwd: STP Environmental Report Issues
Creation Date: 1/17/2008 10:04:17 AM
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1:05:06 PM	33792	1/17/2008

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Concealed Subject: No
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Alternatives

Are the alternative sites viable? (Water Availability)

Sections 9.3.1.4.2, 9.3.1.4.3, and 9.3.1.4.4 -- Is use of representative sites sufficient? Particularly when there may be water problems at all of the 3 sites? Does this bias the alternative site comparison to the point where only clearly inferior sites were chosen... particularly in light of the statement that water is available?

Background

Section 9.3.1.2 -- 1st paragraph -- “The necessary infrastructure, cooling water supply, and transmission lines are all well supported in the area.”

Section 9.3.1.3 --1st paragraph -- “STPNOC eliminated sites that lacked suitable cooling water sources and appropriate infrastructure (such as roads and railroads).”

Section 9.3.1.4--2nd paragraph “STPNOC noted that additional capacity at a site may result in adverse cumulative effects. For example, locating a new nuclear plant at an existing facility may result in new transmission corridors or strain existing water resources. With these considerations in mind, STPNOC looked at candidate sites that had sufficient transmission, water availability, and land to co-locate a plant. It then chose a representative site for comparison, and carried that site forward as an alternative.”

ER Alternative Site Statements

Limestone Site

Section 9.3.2.1.3... “Dry cooling”. If adequate water is available at the Limestone site, why would dry cooling be used at the site? 100% dry cooling? Is this eliminating the site for economic reasons should the site appear environmentally preferable?

Allen’s Creek Site

Section 9.3.2.2.3 -- “Based on current plans, reservoir construction would begin in year 2018 and be completed in year 2030. Construction of the Allen’s Creek Reservoir is part of the comprehensive TWDB water strategy for the region, as outlined in their 2007 Water Report (TWDB 2007, Reference 9.3-19). Most of the water (70%) in the reservoir has been appropriated by the City of Houston. The Brazos River authority owns the remaining water, and rights to the necessary cooling water source could be acquired from either entity. If the plant was built before the reservoir was complete, ground water would be required. However, ground water models - as well as existing state laws – make ground water an uncertain source.” Doesn’t this eliminate the Allen’s Creek site without need for further analysis? Does the Allen’s Creek Site meet STPNOC criteria for a candidate site? Does the Allen’s Creek Site meet the timeframe for need for power generation? Is it a viable alternative?

Malakoff Site

Section 9.3.2.3.3 --“The Malakoff site is located atop the Carrizo-Wilcox Aquifer, a major aquifer supplying most of eastern Texas groundwater. Sixty-three percent (63%) of the

aquifer, including groundwater under the Malakoff site is governed by a groundwater control district. (TWDB 2007, Reference 9.3-19) Across the entire Carrizo-Wilcox aquifer, the predicted availability of the Carrizo-Wilcox Aquifer for year 2010 is about one million acre-feet per year, compared to a reported water use of 450,000 acre-feet per year (TWDB 2007, Reference 9.3-19). The Aquifer has more than 251,852 acre-feet of availability in the eastern region, with significant potential for further development (TWDB 2006, Reference 9.3-14).

Surface water for the plant could be drawn from any number of reservoirs within a fifty (50) mile radius. For example, Lake Palestine is the second largest reservoir in the Neches Basin and is fed by the Neches River. However, the lake is more than 32 miles from the site. Cedar Lake is about 5 miles from the site. Although ample surface water may be available, construction of the nuclear generation units at the Malakoff Site would require modifications to the existing long-range water management plans for the region. Pipelines would also be required to provide cooling water to the plant.”

These three alternative site sections are inconsistent with the earlier statements that there is adequate water available in the region of interest.

Additional Alternative Site Issues

9.3.2.1 - Discussion of the Limestone site does not take account of NRG’s recently announced plan to add a 3rd coal-fired unit (744 MW) to the site or the possible location of the DOE FutureGen project at or adjacent to the site. Would location of two new nuclear units at the site be feasible given the two preceding projects?

9.3.2.3 - Is the Malakoff site still available? The document does not state ownership nor availability.

Ecological Monitoring

6.5.2 - Monitoring (Regulatory Guide 4.2, Part B, § 6, p. 6-1): RG 4.2, Part A, § 6.a, page ix states that the ER should have at least 6 months of sampling with a commitment to provide the remaining 6 months of sampling after submission of the ER. They have not conducted aquatic monitoring programs in the Colorado River nor the MCR since the 1980's. They do not mention their current monitoring programs at these locations except for in Section 6.5.1.2 (page 6.5-2). Their current monitoring program will not address impingement and entrainment at the Reservoir Makeup Pumping Facility on the Colorado River. While use of the monitoring data from the construction and operations FES is adequate, it is not sufficient, and it leaves the applicant vulnerable to the type of contention that was filed against the Vogtle application.

Explaining the Process (Not telling the story)

9.3 - last paragraph in section (top of page 9.3-4) does not contain an adequate description of the alternative site selection process or provide rationale for screening. Where is the discussion that says “STPNOC did...”, “N sites with in the ROI were considered... Initial screening reduced this number to...”, “Table ___ shows the results of more detailed screening.... Base on this screening...”.

9.3.1 is referenced in 9.3 (page 9.3-1, 3rd paragraph, page 9.3-2 beginning of 1st paragraph). Where is Section 9.3.1?

Data

2.5 – (Cultural Resources) The Area of Potential Effect was not sufficiently identified. There is no description of the cultural and historical setting sufficient for making an assessment. There is not a sufficient description of the previous cultural work done in the area. No archaeological surveys, no historic building surveys, no traditional use surveys were conducted for the ER. The resources in the area were not sufficiently described. These are a few of the examples of missing information in this section of the ER. If there is this much information missing from the assessment, how can any conclusion be drawn on the impact to resources?

2.5.3, 4.1.3, 5.1.3 – These cultural resource sections rely almost solely on data collected during a 1973 survey for Units 1 and 2. During the 1973 survey, only a few small areas on the site were actually investigated due to the thickness of vegetation. Therefore, not only is the data old, it is likely very incomplete.

Documentation

All the appendices were missing.

2.5 – A significant number of the references appear to come from web pages. If that information was not captured (hard copy print out, print to PDF) the exact day it was accessed, the webpage may have since changed, the information is no longer available, and the data is no longer valid.

5.1.3 – The description of consultation with the SHPO is incomplete. The ER states they received a letter from the Texas Historical Commission (THC) that says “no historic properties affected”. The ER does not mention who initiated the consultation and what information was provided to THC. Based on the information provided, or lack thereof, it appears that the findings of the SHPO may have been mischaracterized. The THC letter was supposed to be provided in Appendix A, but we were not provided appendices. There is no mention of consultation with tribes or other interested parties.