

May 6, 2008

MEMORANDUM TO: William F. Burton, Chief
Environmental Projects Branch 1 (RAP1)
Division of Site and Environmental Reviews
Office of New Reactors

FROM: Paul B. Kallan, Project Manager */RA/*
Environmental Projects Branch 1 (RAP1)
Division of Site and Environmental Reviews
Office of New Reactors

SUBJECT: ALTERNATIVE SITE AUDIT TRIP REPORT – MARCH 3 - 7, 2008,
SOUTH TEXAS PLANT COMBINED LICENSE APPLICATION (TAC
NO. MD6691)

The U.S. Nuclear Regulatory Commission (NRC) staff and its contractor Pacific Northwest National Laboratory (PNNL) met March 3, 2008 in Sealy, Texas to discuss known details of the alternative sites. The three alternative sites that were proposed by the South Texas Project Nuclear Operating Company were as follows: Allens Creek, Texas; Limestone, Texas; and Malakoff, Texas. The following three days of the trip were dedicated to conducting a site audit of each alternative site in the morning, meetings with local agencies and officials in the afternoon (attendees provided in Table 1 and 2), and travel to the next alternative site location late afternoon or early evening. Enclosure 1 is the staff's audit summary of the three alternative sites.

CONTACT: Paul Kallan, NRO/DSER/RAP1
301-415-2809

Docket Nos.: 52-012 and 52-013

Enclosures: As stated

MEMORANDUM TO: William F. Burton, Chief

Environmental Projects Branch 1 (RAP1)
Division of Site and Environmental Reviews
Office of New Reactors

FROM: Paul B. Kallan, Project Manager
Environmental Projects Branch 1 (RAP1)
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NAME	PKallan	ARedden	WBurton
DATE	04/ 25/08	04/24/08	05/06/08

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Enclosure 1

**South Texas Project Combined License
Alternative Sites Visit Trip Report
March 3 - 7, 2008**

Overview

Pacific Northwest National Laboratory (PNNL) staff convened with U.S. Nuclear Regulatory Commission (NRC) staff the evening of March 3, 2008, at the hotel in Sealy, Texas. Staff discussed known details of each site, the upcoming schedule of events, and protocol for interactions with the applicant. The following three days of the trip were dedicated to a tour of each alternative site in the morning, meetings with local agencies and officials in the afternoon (attendees provided in Tables 1 and 2), and travel to the next alternative site location late afternoon or early evening. All staff returned home on Friday, March 7, 2008.

Daily Summary

Allens Creek – March 4, 2008

Austin County, Texas

NRC: Paul Kallan (Environmental Project Manager)
Harriet Nash (Ecology)
Dan Mussatti (Socioeconomics)
Barry Zalzman (Cultural Resources/Alternatives)
John Fringer (Project Manager shadow)

PNNL: Nona Diediker (Team Lead)
Rajiv Prasad (Hydrology)
Amoret Bunn (Ecology)
Michael Scott (Socioeconomics)

South Texas Project Nuclear Operating Company (STPNOC):
Russell Kiesling (Senior Environmental Associate, STP Units 3&4)
Gary Gunter (Hydrologist, Tetra Tech)

Property Representative:
Leroy Hauerland (Sealy, Texas)

The staff met with the STPNOC representatives at the hotel in Sealy, and followed them in a vehicle caravan to the Allens Creek site. The tour began with a discussion of site features and review of aerial photos that presented the site boundaries. Leroy Hauerland, a local rancher who leases and manages the property and who was onsite tending his cattle, joined in the discussion and provided the site tour. Mr. Hauerland proved to be a very knowledgeable guide and provided a great deal of information regarding the site and local history.

The team walked and drove much of this 11,000-acre undeveloped site and observed access points, the location of the proposed reservoir that would serve as the source for cooling water, hydrological features, and cultural resource features (Native American burial mounds, historical cemeteries, and a very large, old live oak tree). The majority of the site is cropland and

pastures for grazing, but it also includes forested areas common to the region. Currently, the most direct site access is from State Highway 36 on the west side of the site and consists of a gravel road with a grade crossing across an active rail line.

Staff asked the STPNOC representative how the site might use waters of the proposed Allens Creek Reservoir given that the current timeline for the reservoir's construction is beyond the proposed startup date of STP Units 3 and 4. STPNOC responded that they could buy the land and water rights and construct the reservoir themselves, thus accelerating the completion of the reservoir making its waters available for cooling use.

Following the site tour, socioeconomics staff met with Austin County Commissioners and other local officials in Bellville, Texas. Staff briefed the group on the expectations concerning the plant's construction and operations schedule, and the number of workers at each stage. The audience was then asked about the region's ability to absorb this project. The following significant issues were raised through the subsequent discussions with this group:

- **Workforce:** The consensus was that the existing workforce would not be able to absorb the 5,000+ construction jobs and 800+ operations personnel. They have several large employers in the area currently, including BAE Systems (formerly Cameron Iron Works, which has grown from 800 to 2,000 employees), Wal-Mart, at 800-900 and Willamette Industries (number of employees not noted).
- **Schools:** All of the local school districts are Chapter 42 (poor) districts. The Brazos Independent School District (ISD) has 750 students and would be the one most directly affected by the project. Sealy ISD has 2,500 students and has been growing at 1.5%-2% per year. Bellville has 2,200 students and Katy ISD (not present at the meeting) has been growing very rapidly (Houston influence).
- **Infrastructure:** Jail is currently at capacity. Fire departments are all volunteer and are small, but efficient. Police - Sealy has 19; Wallis has a chief plus four; Sheriff has 46 (including 18 patrol deputies and 3 sergeants). School Capacity - Most districts have some spare capacity in the high schools, but the lower grades are at or near capacity.
- **Subsistence:** There are a lot of stock ponds, white crappie in the creeks, and there is fishing in the Brazos River. Social fish and chicken fries (Knights of Columbus mentioned) are common locally.
- **Cumulative Impacts:** Sealy is believed to be on the cusp of big growth from other causes. A special concern is the Trans-Texas Corridor (TTC), a mega-construction project that would pass through the county and about a mile from the Allens Creek site. The county would lose land off the tax rolls, have cross-corridor access issues and would experience significant impacts from construction activities associated with the TTC. The area also promotes Texas history as a tourism industry and is expecting one million-plus visitors per year to the San Felipe Historical Site and Steven F. Austin State Historical Park. There are currently only 157 hotel rooms locally, thus some tourism business goes to Katy and Columbus. It is unclear how the area could absorb the anticipated number of construction workers.
- **Emergency preparedness:** Route 36 is a hurricane evacuation route and Austin County is a pass-through county for evacuees (i.e., not a stopping point).

Hydrology and ecology staff met with Lloyd Behm, the General Manager of Bluebonnet Groundwater Conservation District in Navasota, Texas. The following information was obtained during this meeting:

- The City of Houston and the Brazos River Authority own the land and water rights to the proposed Allens Creek Reservoir.
- Allens Creek Reservoir would be filled by runoff from the contributing areas of Allens Creek and two tributaries. However, this runoff will not be sufficient to sustain the reservoir at its proposed size; therefore, surplus water (not allocated to any other entity) from the Brazos River would have to be diverted to the reservoir during high flow periods.
- Fresh groundwater located within the Bluebonnet GCD may be available from the surficial aquifer, but permitting from the GCD would be required prior to use.
- There is a significant amount of groundwater available for development in the Gulf Coast Aquifer from the confined Jasper formation, which is 1200-1400 ft thick. However, the water within this aquifer is brackish.

Summary of Allens Creek Site Issues

Hydrology – STPNOC suggested that construction of the Allens Creek reservoir might be completed sooner than proposed if STPNOC acquired the land and constructed the dam for the reservoir themselves. STPNOC would have to acquire water rights from the City of Houston and the Brazos River Authority in order to meet the cooling water requirements for two Advanced Boiling Water Reactor (ABWR) units. If these tasks could be accomplished, there would likely be sufficient cooling water available for Units 3 and 4 at the Allens Creek site.

Socioeconomics – Cumulative impacts to housing, taxes, traffic, and land access could be significant in Austin County due to simultaneous activities associated with tourism, construction of the Trans-Texas Corridor, and construction of Units 3 and 4.

Ecology – The Allens Creek site has ecological resources that could be managed properly in congruence with the development of Units 3 and 4. The proposed site has forested areas that are common to the region; however, the northwestern portion of the property could be managed to preserve trees that are not common in the area (e.g., rather large, old live oaks). There are numerous wetlands on the property that would require further characterization. Allens Creek is prone to flooding the property, and frequent maintenance of roads is required.

Construction of a reservoir would involve adding a dam to Allens Creek thus, impacting the existing aquatic resources. The Brazos River could be another resource for filling the proposed reservoir, but water availability would be limited to times when water flows are in excess of that allocated to current water right holders. Under these conditions, there would be limited impact to the aquatic resources of the Brazos River.

Site Access – Because the most direct site access is currently a gravel road with a grade crossing across an active rail line, site access for Units 3 and 4 would clearly require some development. There is also concern regarding the use of State Highway 36 as the main access route due to its dedication as a hurricane evacuation route. Cumulative transportation impacts to Highway 36 from site access, rerouting of traffic to this highway due to the TTC construction, and a potential hurricane evacuation would be very significant.

**Limestone Electric Generating Station
March 5, 2008
Limestone County, Texas**

NRC: Paul Kallan (Environmental Project Manager)
Harriet Nash (Ecology)
Dan Mussatti (Socioeconomics)
Barry Zalzman (Cultural Resources/Alternatives)
John Fringer (Project Manager shadow)

PNNL: Nona Diediker (Team Lead)
Rajiv Prasad (Hydrology)
Amoret Bunn (Ecology)
Michael Scott (Socioeconomics)

South Texas Project Nuclear Operating Company (STPNOC):
Russell Kiesling (Senior Environmental Associate, STP Units 3&4)
Gary Gunter (Hydrologist, Tetra Tech)

NRG: Gary Mechler (General Manager, Limestone Plant)
Charles Little (Contract Coordinator, Limestone Plant)

The staff met with Charles Little and Gary Mechler, NRG, at the Limestone Electric Generating Station. The group discussed topics related to water availability, the proposed Unit 3 at the coal plant, land availability for STP Units 3 and 4, site features, and natural gas wells on the site.

NRG is planning to start construction in early 2009 on a third coal-fired plant at the site. The third unit will use dry cooling because the two existing units already consume all of their surface water allotment from Lake Limestone, which is owned by the Brazos River Authority. In addition, there may be limited groundwater available at the Limestone plant from the underlying Carrizo-Wilcox aquifer. Staff stated concerns with the safe yield of the lake and the amount of surface water that is already committed to users, leaving little water for cooling use for the proposed nuclear reactors.

The State of Texas owns all the mineral rights on the Limestone property. There are numerous active natural gas wells located throughout the site. Under current state regulations, gas wells can be permitted at a density of one every 40 acres. However, the state will soon change the regulations to increase the density to one every 20 acres, and there is great support for one every ten acres. The natural gas wells would appear to pose a potential safety problem for STP Units 3 and 4.

The potential location for Units 3 and 4 on the Limestone site has not been evaluated, but based on discussions during the meeting with NRG, the facility would likely be constructed on the Freestone County portion of the site. The coal-fired plants, including proposed Unit 3, are located in Limestone County.

After the meeting, Mr. Little took the staff on a site tour in a passenger van. Traffic access is developed, with a short paved access road from State Route 39. Large portions of the site are developed and occupied by a two-unit coal-fired power plant, associated coal-handling facilities, cooling structures, and a landfill for ash burial. Natural features of the site, including streams, have been altered by the existing industrial uses. Only limited forested areas on the site

boundaries appeared to have been undisturbed. Much of the site is an active natural gas field, with production and drilling operations. Stops during the tour included the northeast edge of the landfill, the south edge of the property, and the water intake facility on Lake Limestone.

Following the site tour, staff met with the Limestone and Leon County Commissioners and other local officials in Groesbeck, Texas. Staff briefed the group on the expectations concerning the plant's construction and operations schedule and the number of workers at each stage. The audience was then asked about the counties' ability to absorb the STP project. The following significant issues were raised through the subsequent discussions with this group:

- **Housing:** Housing availability was previously evaluated for the FutureGen project. There has been some increase in demand because of increased hiring at Luminent and the NRG coal units. Temporary housing for the construction period would likely be in RV parks at the south end of Limestone County. Mexia, Groesbeck and Jewitt need more housing. There has been a lot of residential development interest and activity at Lake Limestone.
- **Schools:** Groesbeck ISD has capacity, including a big high school and declining enrollment. Leon County schools are described as "good", with Buffalo recently doubling the size of its high school (tentative opening date of August 2009).
- **Water and Sewer Systems:** These mostly very old, outdated systems are currently in the process of being updated.
- **Public Safety:** The police and Sheriff's departments are currently expanding. There is a new \$20 million hospital with emergency services, Parkview Regional, located in Mexia.
- **Roads:** There is a lot of natural gas and mining activity in the south part of Limestone County. The counties have agreements with the associated companies to either fix damaged roads themselves or provide money to repair the damage. Route 164 is a good road, and Route 80 goes straight to the plant, avoiding Route 39. The Texas Department of Transportation is preparing to widen Route 39 in Leon County.
- **Environmental Justice and Social Services:** Limestone County population is about 30% to 40% Black, 20% Hispanic, and the remaining balance white. The County has indigent health services, but transport to Waco for health, emergency food, Workforce Commission services, mental health and mental retardation center (state school). The food bank in Limestone County has about 350 active clients consisting of 50% elderly, single mothers with children, and temporary homeless.

Staff not attending the above-described meeting used the afternoon to gather information from local libraries, historical society offices, and local museums.

Summary of Limestone Site Issues

Hydrology – Currently, Lake Limestone has no excess water that can be permitted for additional use. NRG is planning to add a third coal-fired unit to the site. The third unit will be air cooled because of lack of water in Lake Limestone. The air-cooled unit will still need approximately 2,500 ac-ft water per year that will likely come from three new deep-water wells. Limestone County, where the NRG plant is located, does not currently have a groundwater conservation district; therefore, 'rule of capture' applies. However, availability of land for the nuclear reactors may create a hydrology-related issue. NRG property straddles the county line between Limestone and Freestone counties. There may not be sufficient space available on the portion

of the property located in Limestone County to host two ABWR units. The portion of the property that lies in Freestone County has sufficient space. In this scenario, groundwater use will be subject to permitting from Mid-East Texas Groundwater Conservation District, which includes Freestone County as one of its three constituent counties. If Units 3 and 4 were built on the Limestone site, air cooling may be the most appropriate heat dissipation method at this site due to lack of water availability.

Ecology – The Limestone site is an industrial area where much of the site has been previously disturbed. There are several developed roads through the area and the extent of wetlands and streams appears to be limited.

Socioeconomics – Based on the discussion with Limestone and Leon County Commissioners and other local representatives, the area would not have the capabilities to support the socioeconomic growth (schools, roads, hospitals or housing) associated with construction and operation of STP Units 3 and 4 at the Limestone site.

Land Use – NRG does not own mineral rights on the property and is involved in court cases with mineral rights owners that want to extract underlying natural gas from locations that would interfere with the power plant operations. Much of the site is an active natural gas field, with production and drilling operations. In the future, these wells could become as dense as one every 20 acres. The presence of these gas well drillings, especially laterals, may pose a potential man-made hazard to the safety of the nuclear units, no matter where they are located on the property.

Malakoff
March 6, 2008
Henderson County, Texas

NRC: Paul Kallan (Environmental Project Manager)
Harriet Nash (ecology)
Dan Mussatti (socioeconomics)
Barry Zalcman (cultural resources/alternatives)
John Fringer (Project Manager shadow)

PNNL: Nona Diediker (Team Lead)
Rajiv Prasad (hydrology)
Amoret Bunn (ecology)
Michael Scott (socioeconomics)

South Texas Project Nuclear Operating Company (STPNOC):
Russell Kiesling (Senior Environmental Associate, STP Units 3&4)
Gary Gunter (Hydrologist, Tetra Tech)

Mr. Kiesling provided a guided vehicle tour of the site including stops near the south access off Lockland School Road, Antioch cemetery near the east edge of the property, and a potential location for Units 3 and 4. Access to a significant portion of the site was inaccessible due to wet ground conditions. This is a very large, 13,000-acre, undeveloped site containing woodlands and pastures used for cattle grazing and with transmission, oil and natural gas lines traversing the property. This site has previously been examined as a potential location for a coal-fired power plant, and was a candidate site for the FutureGen facility. Considerable work would be required for site access associated with Units 3 and 4. Neither the state highway leading to the site from the town of Malakoff, nor the country roads approaching on the north and south perimeters of the site, would be good access roads. Though the current road infrastructure is not conducive to site access, it could be improved through upgrades and potentially a bypass around the City of Malakoff.

Following the site tour, staff met with Henderson County Commissioners and other local officials who felt that the area has the capacity to support the socioeconomic growth in terms of infrastructure, schools, social services and housing if the two ABWR units were to be built at the Malakoff site. Some of the information gathered during the meeting in Henderson County included:

- Temporary Housing: The area has about 1000 hotel rooms in close proximity and 1000 R.V. slots in the county. However, many of the latter are committed to fishing and recreation at Cedar Creek Lake, so there might be conflict with construction worker occupation of the same resources.
- Police and Fire: Athens has 32 firefighters, the County 35 to 40 firefighters plus investigators, and the City of Malakoff also has their own fire department. The Athens fire department has a strong training program including local training facilities, hazmat, and an emergency operations center. There are 13 incorporated towns around Cedar Creek Lake, protected by 14 police departments. Ambulance/EMS are covered by East Texas Medical Center in Tyler.
- Tourism: They have a pro circuit rodeo, old-time fiddlers contest, bass tournaments at Cedar Creek Lake, Texas fresh water festival, and other local festivals.

- Environmental Justice: Athens schools are 35% Hispanic, 16% Black, with the balance being white. Sixty two percent of the school population receives free/low cost meals. The unincorporated County has a higher proportion of white population than the cities (Malakoff, Athens, and Trinidad), for which the minority group is heavily Hispanic.
- Social Services: There is a strong have/have not split. The latter population is most likely to be the elderly or single mothers. There are numerous services, including Council on Aging, United Way, FEMA, Ministerial Alliance, four to five food pantries, several clothing outlets, domestic violence group, and 112 non-profits in the county.
- Economic Development: Generally, the individuals raised in the area do not return after attending college due to the lack of job opportunities.

Hydrology and ecology staff met with Monty Shank, General Manager of the Upper Neches River Municipal Water Authority (UNRA). UNRA is responsible for permitting water out of Lake Palestine. During this conversation, staff gathered the following information:

- Cities of Palestine, Tyler, and Dallas use water from Lake Palestine. The cities of Dallas and Fort Worth are also hoping to obtain more water from Lake Palestine.
- The excess capacity in Lake Palestine is currently approximately 18,000 ac-ft of water per year. However, UNRA is not planning to permit this available water in order to allow for future growth by currently permitted users.
- Cedar Creek Reservoir is utilized by the City of Fort Worth for their potable water supply and likely has no excess water available.
- The state is recommending construction of a new lake, Lake Fastrill, located on the Neches River, downstream from Lake Palestine. Construction of the new reservoir would begin in 2050. The storage capacity of this lake will be approximately the same as that of Lake Palestine. The plan is for Lake Fastrill waters to be pumped up to Lake Palestine and eventually, via a new pipeline, to Cedar Creek Reservoir in order to increase water availability for the Dallas-Fort Worth area.
- Timber companies currently own the land on which Lake Fastrill is to be built. However, the US Fish and Wildlife Service is planning a wildlife refuge on the same land, so it is not apparent the land will be available for a reservoir.
- Lake Eastex/Lake Columbia (name is undetermined) is proposed for construction by the Angelina-Neches River Authority near the City of Houston. UNRA would own 20% of the yield. The anticipated timeframe for construction would be beyond the year 2050.
- Groundwater permitting in the region is controlled by the Neches and Trinity Valleys Groundwater Conservation District, located in Jacksonville, Texas. There may not be sufficient ground water available in the underlying Carrizo-Wilcox aquifer to support the two proposed ABWR units.

Summary of Malakoff Site Issues

Hydrology – There are no water sources currently at the site. The ER mentioned Cedar Creek Reservoir, approximately 7 miles north of the site and Lake Limestone, approximately 32 miles east, as possible sources of water. Staff’s research and conversations with local agencies revealed that Cedar Creek Reservoir likely has no additional water available for permitting. Lake Palestine has approximately 18,000 ac-ft of available water per year, but it is unlikely UNRA will permit the excess to new users. Another reservoir, Richland-Chambers, is located

just 12-13 miles southwest of the Malakoff site, but the ER did not mention this reservoir as a possible source for cooling water. Staff does not have any information at this time regarding how much water may be available from this reservoir.

Groundwater would have to be permitted from Neches and Trinity Valleys Groundwater Conservation District. This Malakoff site may have limited water availability and therefore might require dry or wet-and-dry hybrid cooling methods.

Ecology – The Malakoff site has similar terrestrial resources as Allens Creek. There are numerous wetlands on the site that would require further characterization if the site were selected. The site is extremely large, thus providing opportunity to construct Units 3 and 4 without impacting previously undisturbed areas of the property. There is no apparent access to water for a nuclear power plant in the region. Without a known water source, it is difficult to determine aquatic ecology impacts.

There needs to be follow up communication by staff with the Federal and State ecological resource agencies for each of the alternative sites because STPNOC had not initiated this communication at the time of the site visits. None of the alternative sites appears to have suitable habitat for the threatened and endangered species known to occur in the counties where the sites are located.

Site Access – Considerable work would be required for site access required for construction and operation of Units 3 and 4 on the Malakoff site. Neither the state highway leading to the site from the town of Malakoff, nor the country roads approaching on the north and south perimeters of the site, would be good access roads. Though the current road infrastructure is not conducive to site access, improvements could be made through upgrades and potentially a bypass around the City of Malakoff.

TABLE 1. COUNTY MEETINGS

This table is representative of those meeting attendees who elected to sign-in. Additional persons may have been in attendance at each meeting.

Austin County Meeting

Tuesday March 4th @ 1:30

Austin County Commissioners Courtroom
Bellville, Texas

NRC: Dan Mussatti, John Fringer, Paul Kallan

PNNL: Michael Scott

David Hubenak	Austin County Commissioner
Carolyn Bilske	Austin County Judge
DeWayne Burger	Austin County Sheriff
Richard Holloman	Austin County Sheriff's Office, Chief Deputy
John Conley II	Bellville ISD Superintendent
Jack Ellis	Brazos ISD
Gene Svoboda	Realtor/Appraiser (Sealy, TX)
Nick Tirey	Sealy Mayor, Pro-Tem

Limestone County Meeting

Wednesday March 5th @ 1:30

Limestone County Courtroom
Groesbeck, Texas

NRC: Dan Mussatti, Paul Kallan

PNNL: Michael Scott

Sharon Barnes	Groesbeck Economic Development Corporation
Martha Stanton	Groesbeck City Administration
Jackie Levingston	Groesbeck Mayor
Bill Haynes	Groesbeck Food Bank
Elise Haynes	Groesbeck Food Bank
Virginia Sitton	Jewitt Mayor
Byron Ryder	Leon County Judge
Lee Dudley	Limestone County, AgriLife Extension
Daniel Burkeen	Limestone County Judge
Dennis Wilson	Limestone County Sheriff
John McCarver	Limestone County Commissioner
H.C. Clark	Limestone County
Matt Groveton	Limestone Emergency Management
Tommy C. Tucker	Mexia Economic Development Corporation

Henderson County Meeting
Thursday March 6th @ 1:30
Athens Chamber of Commerce
Athens, Texas

NRC: Dan Mussatti, Paul Kallan
PNNL: Michael Scott

Gus Flener	Athens Chamber of Commerce
Mitch West	Athens Chamber of Commerce
Fred Hayes	Athens ISD Superintendent
Randy Daniel	Athens Mayor
Jo Ann Hanstrom	Cedar Creek Lake Area Chamber of Commerce
Jerry West	Henderson County Commissioner
Beth Cain	Henderson County Help Center
Glendon Forgey	Trinity Valley Community College, President

TABLE 2. HYDROLOGY MEETINGS

Bluebonnet Groundwater Conservation District

Tuesday, March 4, 2008 @ 1:30

Navasota, Texas

NRC: Harriet Nash

PNNL: Rajiv Prasad, Amoret Bunn, Nona Diediker

Lloyd Behm

General Manager, Bluebonnet Groundwater
Conservation District

Upper Neches River Municipal Water Authority

Thursday, March 6, 2008 @ 2:00

Frankston, Texas

NRC: Harriet Nash, John Fringer

PNNL: Rajiv Prasad, Amoret Bunn, Nona Diediker

Monty Shank

General Manager, Upper Neches River Municipal
Water Authority (UNRA)