CALVERT COUNTY
BOARD OF COUNTY COMMISSIONERS

Courthouse, 175 Main Street
Prince Frederick, Maryland 20678
Phone: (410) 535-1600 • (301) 855-1243

Board of Commissioners
Gerald W. Clark
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73 FR 8719

(W6)

April 1, 2008

Mr. Tom Fredrichs
Senior Project Manager
Division of New Reactor Licensing
Nuclear Regulatory Commission
M/S T-7E18
11545 Rockville Pike
Rockville, MD 20852

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2008 APR 22 PM 4:08
RULES AND DIRECTIVES BRANCH USNRC

RE: Docket Number: 52-016

Dear Mr. Fredrichs:

The Calvert County Board of County Commissioners (BOCC) appreciates the Nuclear Regulatory Commission's (NRC) efforts to solicit input from the public on the environmental impact surrounding the submittal of the partial combined operating license (COL) by UniStar Nuclear Energy (UniStar) and subsequent required Environmental Report (ER). We are aware that the ER is specific to the request for a license to build and operate an Evolutionary Power Reactor (EPR) at Calvert Cliffs Nuclear Power Plant referenced in the application as Calvert 3.

The BOCC understands the NRC's role, process, and intent of the public scoping meeting and ultimate preparation of the draft Environmental Impact Statement (EIS) as follows:

- The NRC is an independent and technically oriented government agency that evaluates the safety of the proposed plant and its potential impact on the environment and the surrounding community.
- The NRC is not an advocate for nuclear power or for the proposed expansion.
- The NRC process involves extensive reviews by independent technical experts as well as significant involvement from the public. The NRC has demonstrated success throughout the country, which was proven locally during the re-licensing of the Calvert Cliffs Nuclear Power Plant and recently through your public outreach session in August 2007 that explained the process for licensing a new reactor.
- The NRC will prepare a draft Environmental Impact Statement (EIS) in accordance with the National Environmental Policy Act to evaluate the potential environmental impacts and benefits of the proposed plant. After completing this review, the NRC will issue a draft EIS for comment by the appropriate Federal, State, and local agencies as well as by the public.

E-RIDS = ADM-03

Add = T. Fredrichs (TF)
L. Quinn (LMQ1)

SUNSI Review Complete
Template = ADM-013

We understand that under the NRC regulations in 10 CFR Part 52 (*Part 52—Early Site Permits; Standard Design Certifications; And Combined Licenses For Nuclear Power Plants*) and in accordance with the applicable provisions of 10 CFR Part 51 (*Part 51--Environmental Protection Regulations For Domestic Licensing And Related Regulatory Functions*), which are the NRC regulations implementing the National Environmental Policy Act of 1969 (NEPA), the NRC is required to prepare an EIS as part of its review of an early site permit (ESP) or COL application. We also understand that NRC staff will conduct its environmental review using NUREG-1555 (*Standard Review Plans for Environmental Reviews for Nuclear Power Plants*) Environmental Standard Review Plan (ESRP). We have confirmed that UniStar used NUREG-1555 as a basis for developing the ER and that the ER includes 10 parts that are required to support the NRC EIS.

The ER, as required, reviews possible environmental impacts including land, water, air, ecology, and socioeconomic analyses related to the construction and operation of a new nuclear unit if built; the report also reviews the benefits of a new reactor. During the construction phase, we understand that there will be environmental impacts, several of which have been identified by UniStar. We ask that the NRC look into the identified impacts and, during your independent review, determine the most appropriate mitigation measures when needed.

Based on our knowledge of the EPR as an evolutionary design with multi-level safety-related components, we concur with the conclusions of the UniStar ER, specifically that there would be minimal impact from the construction and operation of a new nuclear reactor and that the community benefit would be substantial.

As you know, the EPR uses active front-line safety systems and simplified components to minimize the risk for environmental impacts and is an environmentally conscious option that can avoid the creation of greenhouse gases. The EPR's key safety-related structures – the reactor containment building, the reactor safety building, two buildings that house the reactor's safety systems – and the building that would house the reactor's spent fuel – are designed to withstand the impact of a large commercial airplane crash. Additionally, the design features increased redundancy and physical separation of the plant's safety systems, a double containment to house the nuclear reactor: with two, separate, cylindrical concrete buildings that surround the reactor – one inside of the other. The wall of the inner building, known as the "reactor containment building," will be made of concrete that is four feet, three inches thick. The concrete is further fortified with a "spider web-like" set of reinforced steel. This inner containment also has a quarter-inch thick steel liner. There is an open space between the inner and outer containment buildings to provide additional protection.

Additionally, it is our understanding that no new transmission corridors will be required to support Calvert 3 and that UniStar has taken several key steps to minimize the environmental impact by:

- Using a hybrid cooling tower design that is much lower to the ground and will be equipped with a plume-abatement system to eliminate visible water plume from the tower;

- Constructing a desalination plant to eliminate the need to use area groundwater sources once the plant is operational; and
- Selecting a cooling system for Calvert 3 that would take in approximately **98 percent less water from the Chesapeake Bay** than the existing Calvert Cliffs Units 1 & 2.

We would like to make certain that our citizens understand one key construction fact: there are no new transmission corridors necessary to build Unit 3. It is important to note that Unit 3 not be confused with other proposed utility improvement projects in Calvert County. The 500kv transmission line currently serving Calvert Cliffs will accommodate the expansion with some upgrades to substations.

Both Maryland and the nation are at a critical juncture. While conservation and energy efficiency will be important responses to increased electricity demand, and we support those efforts as does Constellation Energy and UniStar, conservation and energy efficiency will not offset the need for new base-load generation in Maryland or across the country. We need new energy generation and we need to reduce our dependence on foreign energy supply. Most importantly, we need to work together to reverse the growth of greenhouse gas emissions; nuclear is the most viable option to do this.

Regardless of whether the expansion occurs, it is important to remember that nuclear energy is critical to our country's ability to provide clean, safe, and reliable energy while balancing our responsibility to the environment. The Calvert Cliffs plant alone avoided the emission of 101,400 tons of SO_2, 18,800 tons of NOx and 12.0 million metric tons of CO_2 in the year 2006. *(Source:NEI/EPA).* To the average citizen that means that 18,800 tons of NOx were avoided by Calvert Cliffs in 2006 – the equivalent of 1.0 million passenger cars.

Opposition to nuclear power can be intense and emotional, despite the industry's excellent overall safety record. We understand how important it is that each voice is heard during this process. Recognizing that we may be criticized by our decision to encourage an expansion, we do welcome and encourage all comments throughout the process. We also understand that there will be individuals or groups who believe that our support is uninformed or strictly financially motivated. However, we assure you that Calvert County possesses the history and knowledge of the nuclear industry, an understanding and appreciation of Calvert Cliff's safe operating history, and the plant's dedication to public safety and the environment. Unlike outside entities, Calvert County also assumes all of the perceived risk. We take our responsibility to the community and environment seriously; we live and work here.

We appreciate your open and transparent process and welcome public input from all parties. However, when considering your draft EIS, we know that you will receive valuable public comment that will be germane to your review of the EIS and whether the project is viable from a regulatory standpoint. We look forward to your in-depth review and analysis that confirms this.

As stated in August 2007, many of the decisions we make are difficult; however, our decision to support the potential expansion remains simple, uncomplicated, and consistent. Calvert County will continue to stand by Calvert Cliffs Nuclear Power Plant, Constellation Energy, and UniStar as we have done in the past. Today, our support continues and we look forward to the day when Calvert Cliffs again makes history, receiving NRC approval to construct and operate Unit 3.

BOARD OF COUNTY COMMISSIONERS
CALVERT COUNTY, MARYLAND

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cc: Governor Martin O'Malley
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Southern Maryland Delegation
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Mike Wallace, President, Constellation Generation Group
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Linda Vassallo, Director, Calvert County Department of Economic Development