

Mallecia Hood

From: April Hall [ahall@alabamarivers.org]
Sent: Friday, April 25, 2008 4:23 PM
To: BellefonteCOLEIS Resource
Subject: Comments of the Alabama Rivers Alliance on 52-014 and 52-015
Attachments: ARA comments Bellefonte application 4-08.doc

Please find attached the comments of the Alabama Rivers Alliance for environmental scoping of the proposed Bellefonte nuclear power plant in Scottsboro, Alabama (NRC Docket No 52-014 and 52-015, Federal Register February 21, 2008, page 9604).

April Hall, P.E.
Program Director
Alabama Rivers Alliance
2027 Second Avenue North, Suite A
Birmingham, Alabama 35203
(205) 322-6395
fax 322-6397
www.alabamarivers.org
www.AlabamaWaterAgenda.com

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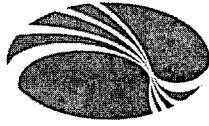
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Alabama Rivers Alliance
Water Is Life

Transmitted via electronic mail (Bellefonte.COLEIS@nrc.gov)

April 25, 2008

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

**RE: Proposed Bellefonte Nuclear Plant
NRC Docket Nos. 52-014 and 52-015**

Dear Sir or Madam:

The Alabama Rivers Alliance (Alliance) submits these comments on the Environmental Scoping Process for TVA's application for combined license for the proposed Bellefonte Nuclear Plant pursuant to Federal Register notice dated February 21, 2008, page number 9604-9606.

The Alliance is a 501(c)3 non-profit organization dedicated to the protection and restoration of waters in the state of Alabama. We represent more than 850 individuals and 50 grassroots watershed groups across the state.

The Alliance would like to request additional time for public review of the application and associated documents. The Environmental Report (ER) alone is more the 1,200 pages, not including the figures. The information is difficult to navigate and I was unable to review significant portions of the document through the on-line interface. In addition, the Alliance was not made aware of the availability of this document until several weeks after the Federal Register notice, despite being a known stakeholder in this process. We request that NRC extend the public comment period an additional 60 days to allow stakeholders to review the volumes of information contained in the application.

Our primary concerns with the proposed project are water quality and quantity in the Tennessee River due to the withdrawals and discharges of the project. Nuclear power plants are water-intensive, requiring large amounts of cooling water and available waterbodies for discharge of pollutants. Based on the short amount of time given to the public to review the large amount of information pertaining to this project, our comments are offered based on the amount of information we were able to review in the public comment period.

Drought Management

During the drought of 2007, TVA was forced to shut down Brown's Ferry nuclear plant due to low flows and high water temperatures in the Tennessee River. As the proposed Bellefonte site

is well upstream of the Brown's Ferry plant, similar shutdowns are likely as flows are less at the proposed site. We urge NRC to require a robust drought management and monitoring plan to ensure withdrawals and discharges are not adversely affecting the instream and downstream uses of the River.

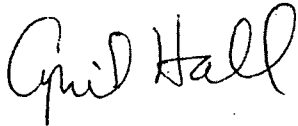
Town Creek

The ER inaccurately reports that none of the waters in the vicinity of the site are water-quality impaired (page 2.3-40). While Gunter'sville reservoir and Town Creek do not appear on the recent Alabama 303(d) list, a total maximum daily load (TMDL) has been prepared for Town Creek for ammonia and low dissolved oxygen. Please instruct TVA to update the ER to reflect the current water quality conditions and TMDL in Town Creek. The TMDL can be found on the Water Division page of ADEM's website, www.adem.state.al.us.

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We appreciate the opportunity to submit comments on the proposed project. Please notify us as soon as possible of NRC's decision to extend the public comment period. If you have any questions regarding this submittal, please contact me at (205) 322-6395 or ahall@alabamarivers.org. Thank you for your consideration of these comments.

Sincerely,



April Hall, P.E.
Program Director