SCE&G®
A SCANA COMPANY

April 9, 2007

Ms. Elizabeth Johnson
State Historic Preservation Office Representative
Central Midlands Region
South Carolina Department of Archives and History
The South Carolina Archives and History Center
8301 Parklane Road
Columbia, SC 29223

SUBJECT: Virgil C. Summer Nuclear Station
New Nuclear Deployment Project
Request for Cultural Resources Information

Dear Ms. Johnson:

South Carolina Electric and Gas Company (SCE&G) is preparing an application to the U.S. Nuclear Regulatory Commission (NRC) for a combined construction permit and operating license (COL) that would allow SCE&G to build and operate up to two additional nuclear units at the Virgil C. Summer Nuclear Station (VCSNS) site in Fairfield County, South Carolina. Although SCE&G is preparing the COL application, the proposed nuclear units are a joint venture between SCE&G and the South Carolina Public Service Authority, commonly referred to as "Santee Cooper." The new units would be jointly owned by SCE&G and Santee Cooper, but would be operated by SCE&G.

As required by the National Environmental Policy Act (NEPA), the NRC will prepare an Environmental Impact Statement (EIS) based, in part, on the information in applicants' COL application. Under 36 CFR 800.8, an agency may incorporate compliance with Section 106 of the National Historic Preservation Act (NHPA) into the NEPA process, and NRC does so by consulting with the State Historic Preservation Office (SHPO) during the EIS preparation process and including the results of that consultation in the NEPA analysis.

The VCSNS site is approximately 15 miles west of the Fairfield County seat of Winnsboro. The closest population center (i.e., having more than 25,000 residents) to the site is Columbia, South Carolina, approximately 14.5 miles southeast of the VCSNS (see attached Figure 2.1-2). The closest community is Jenkinsville, less than 3 miles southeast of the site (see attached Figure 2.1-3).

The existing VCSNS (Unit 1) generating facilities and switchyard are located on the south shore of Monticello Reservoir (see attached Figure 2.1-1). The proposed VCSNS Units 2 and 3 and supporting infrastructure would be built approximately one mile south-southwest of Unit 1. A nuclear exclusion zone, defined as the area within approximately one mile of Unit 1 combined with the area 3,390 feet from the center of proposed Units 2 and 3, would be posted and access to

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land portions of this area would be controlled. The boundary of the exclusion zone, shown on attached Figure 2.1-1, also defines the site boundary. The VCSNS property, thus defined, covers approximately 2,560 acres, and includes the southern portion of Monticello Reservoir and parts of SCE&G's Fairfield Pumped Storage Facility (see Figure 2.1-1).

Preliminary to an official agency consultation, SCE&G met informally with Ms. Rebecca Debrasko and Mr. Chad Long on June 5, 2006 to provide them early information on the project and the COL application process. During the visit, SCE&G and Ms. Debrasko and Mr. Long discussed the results of SCE&G's initial research on the potential for cultural resources at the proposed project site and the need for additional cultural resource surveys.

During 2006 and 2007 SCE&G conducted three Phase I surveys of the proposed project site – one at the location of the meteorological monitoring tower, and two on the property affected by the construction of the new units. The survey reports will be available on request.

In brief, the survey of the 17.5-acre meteorological tower site identified one site believed to be the home site of the Revolutionary War patriot, General John Pearson. The site was severely disturbed and therefore, was recommended as ineligible for inclusion in the National Register of Historic Places. The South Carolina SHPO has concurred with this recommendation and determined that the site is not eligible.

During the Phase I survey of the proposed project area, seven archaeological sites were recorded and assessed for their National Register eligibility. All of the archaeological sites were very disturbed and lacked integrity, and all were recommended as not eligible for inclusion in the National Register of Historic Places. General Pearson's grave and an associated DAR monument is recommended as eligible for inclusion in the National Register and the cemetery in which he is buried is recommended as potentially eligible. SCE&G has, subsequently, fenced the cemetery to protect it.

Based on the results of the Phase I surveys, SCE&G believes that the construction of two new units at the V.C. Summer Nuclear Station will not adversely affect cultural or historical resources in the vicinity. SCE&G would appreciate the SHPO sending us a letter identifying any concerns you may have about archaeological or cultural resources in the project area or confirming SCE&G's conclusion that the proposed project will not adversely affect cultural or historical resources at the V.C. Summer Nuclear Station. SCE&G will include a copy of this letter and your response in the COL application that we submit to NRC. Please call Mr. Stephen E. Summer (803-217-7357) if you have any questions or require additional information to review the proposed action.

Sincerely,

Al Paglia
Manager, Nuclear Licensing

Enclosure: Figures

cc: Randy Mahan
Hagood Hamilton
Ken Browne
Steve Connor
Jan Renfro
Steve Summer
April Rice
Kathryn Sutton
NND-07-0002 (1080)

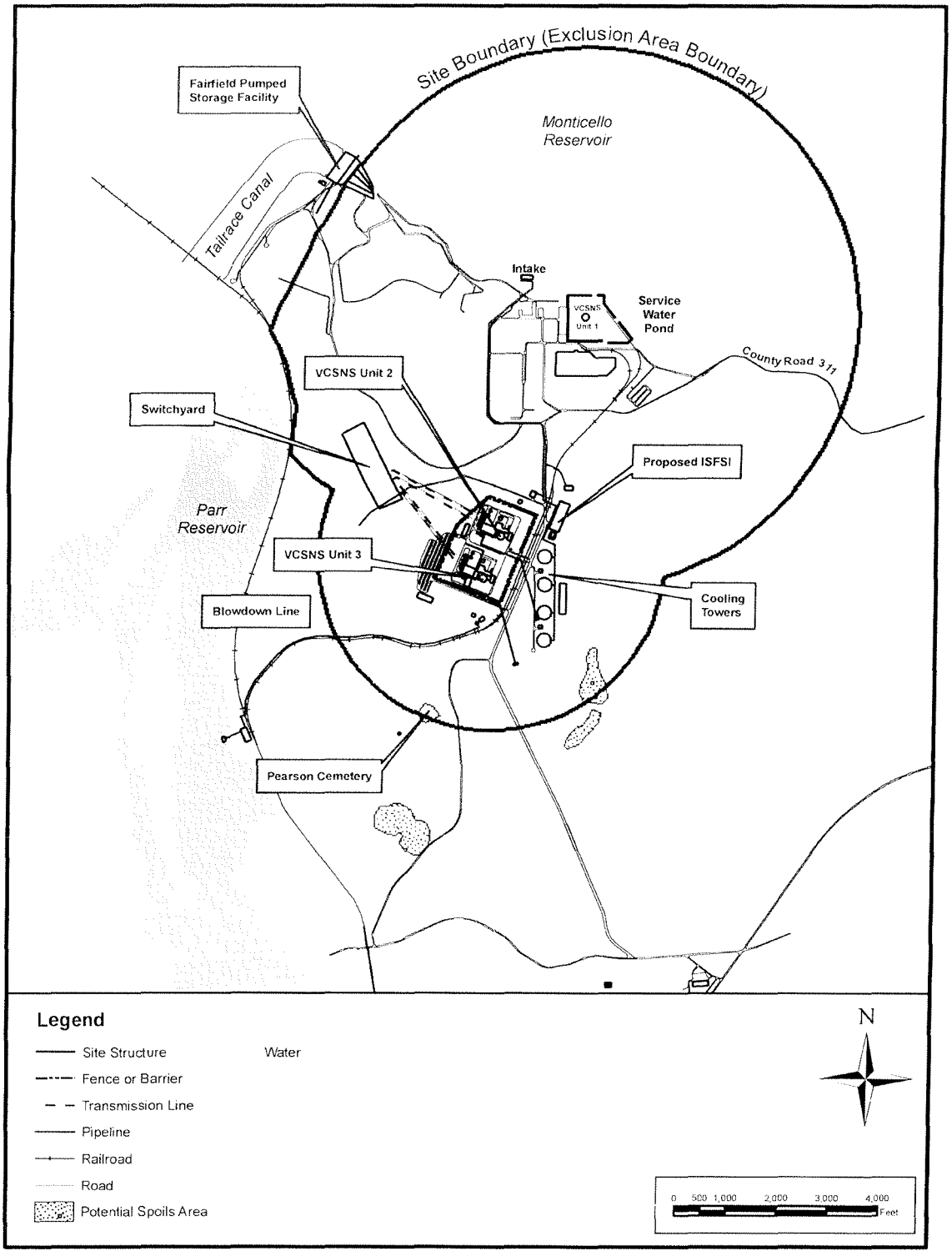

Figure 2.1-1 VCSNS Site and Proposed Plant Footprint

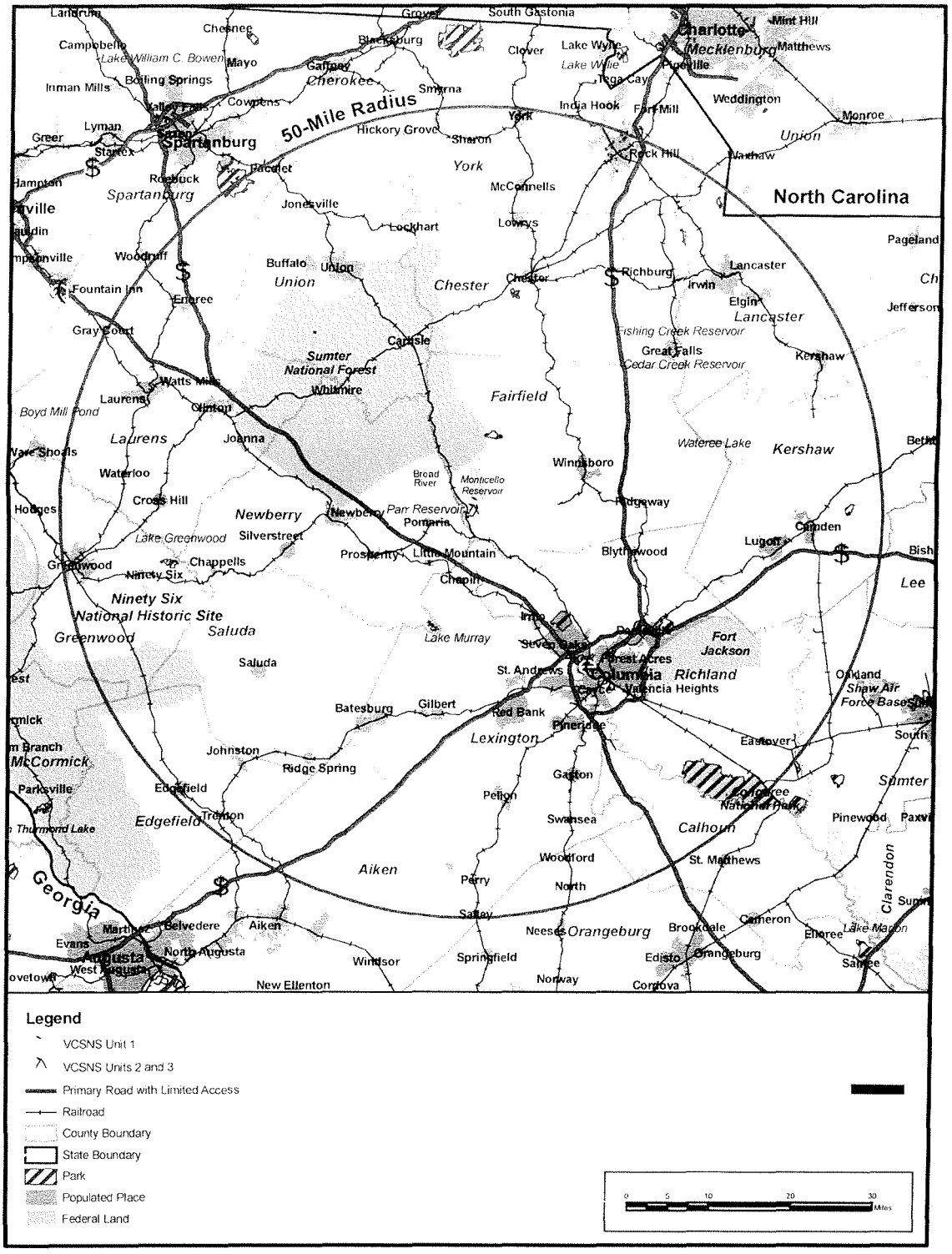

Figure 2.1-2 50-Mile Vicinity

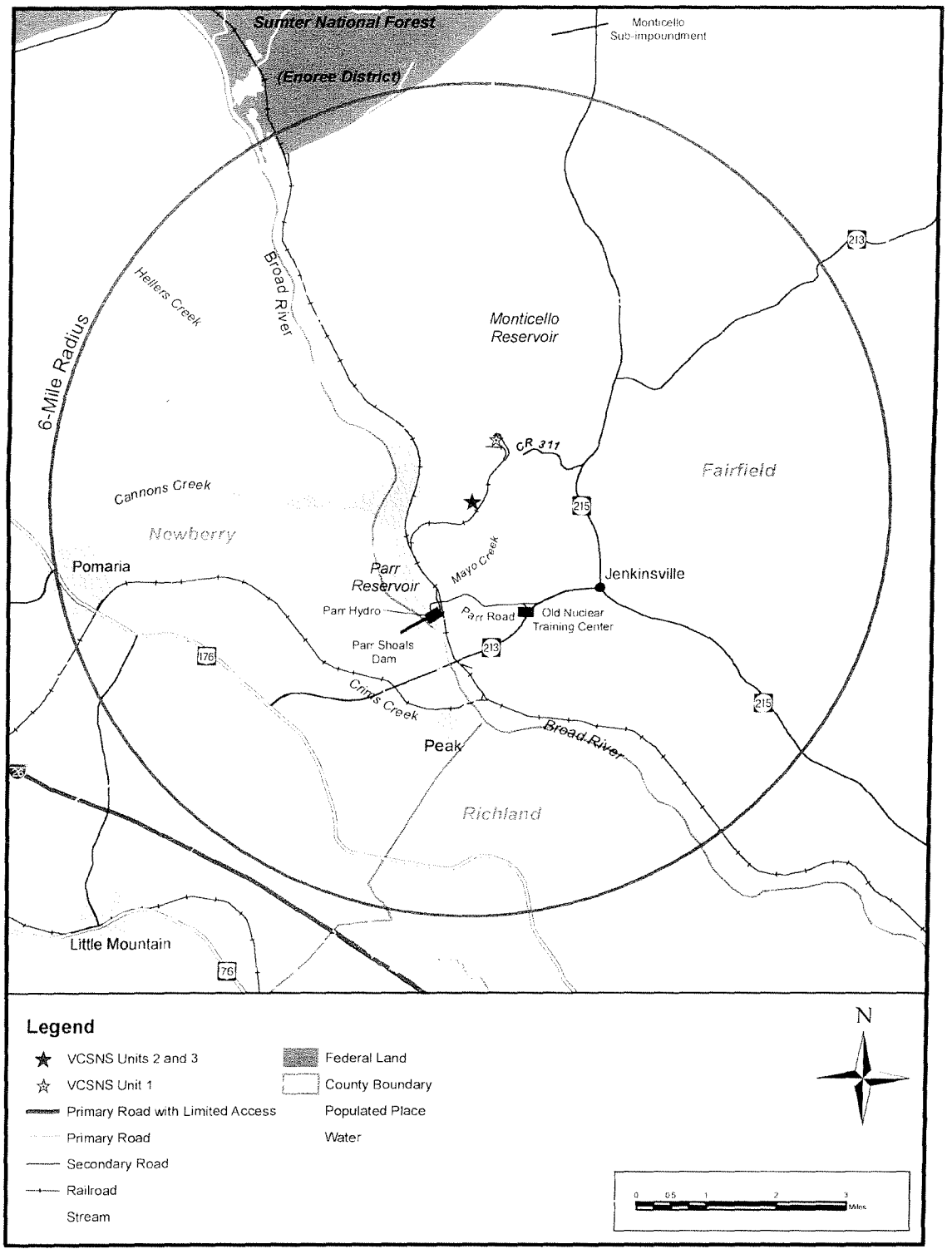

Figure 2.1-3 6-Mile Vicinity

THE South Carolina Archives & History Center
History & Heritage For All Generations

April 27, 2007

Mr. Al Paglia
Manager, Nuclear Licensing
SCE&G, New Nuclear Deployment
P.O. Box 88, MC P40
Jenkinsville, SC 29065

Re: V.C. Summer Nuclear Station
Fairfield County, South Carolina

Dear Mr. Paglia:

Thank you for your letter of April 9, which we received on April 16, regarding the Nuclear Regulatory Commission application for the V.C. Summer Nuclear Station. Our office has reviewed and commented upon the proposed meteorological monitoring tower at the station.

We are unable to comment on any concerns we may have for this project until we review the cultural resources survey conducted for the construction of the new nuclear units. Please provide our office with one copy of the cultural resources survey (two if architectural properties in the Area of Potential Effects were identified) for our review.

Please note that Chad Long is no longer with our office. The archaeologist working with me on this project is Chuck Cantley. Chuck can be reached at (803) 896-6181 or ccantley@scdah.state.sc.us.

These comments are provided by the State Historic Preservation Office pursuant to Section 106 of the National Historic Preservation Act, as amended. If you have questions, please contact me at (803) 896-6169 or dobrasko@scdah.state.sc.us.

Sincerely,

Rebekah Dobrasko

Rebekah Dobrasko
Review and Compliance Coordinator
State Historic Preservation Office

S.C. Department of Archives & History ♦ 8301 Parklane Road ♦ Columbia ♦ South Carolina ♦ 29223-4905 ♦ 803-896-6100 ♦ www.state.sc.us/scdah

The South Carolina Archives & History Center
History & Heritage For All Generations

August 16, 2007

Mr. Al Paglia
Manager, Nuclear Licensing
SCE&G
P.O. Box 88
MC P40
Jenkinsville, SC 29065

Re: V.C. Summer Nuclear Station
Two New Generating Units
Fairfield County, South Carolina

Dear Mr. Paglia:

Our office has had the opportunity to review the reports entitled *Archaeological Survey of Planned Improvements at V.C. Summer Nuclear Station*, the addendum to this report, and the *Summary of All National Register Listed Properties in Ten Counties to be Affected by Transmission Line Rights of Ways Associated with Improvements at V.C. Summer Nuclear Station*. Below are our comments on these reports, and the overall licensing process for the V.C. Summer Nuclear Station.

Archaeology at the Nuclear Station

The reports meet both State and Federal standards for the identification, documentation, and assessment of cultural resources. We concur with the recommendations that the Pearson Cemetery is potentially eligible and the grave of General John Pearson and the associated DAR monument are eligible for listing in the National Register of Historic Places. We understand that SCE&G plans to avoid these resources in order to ensure that **no adverse effect** will occur. Our office recommends that a preservation covenant should be recorded to protect these resources.

All other archaeological sites and isolated finds identified by the survey were recommended as not eligible for listing in the National Register, and we concur with this recommendation. No further work is necessary.

Proposed Transmission Line Corridors

We understand that the final routing for potential transmission line corridors associated with this project is not determined. The summary of National Register properties prepared for the transmission lines should assist SCE&G in determining routing for these lines. SCE&G should consider both listed properties and those properties determined to be eligible for listing in the National Register when planning their routes. Our office maintains GIS layers containing information on known historic properties in South

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Carolina. We would be happy to share this information with you, as needed, for planning these transmission lines.

Programmatic Agreement

Our office recommends the development of a programmatic agreement to last the life of the license issued for the V.C. Summer Nuclear Station. This agreement should include our office, the Nuclear Regulatory Commission, SCE&G, and any interested parties as defined under 36 CFR 800. An agreement would ensure that cultural resources are considered in SCE&G's activities under a new license and can address late discoveries of archaeological sites and emergency procedures.

These comments are provided by the State Historic Preservation Office pursuant to Section 106 of the National Historic Preservation Act, as amended. If you have questions on procedural issues, please contact me at (803) 896-6169 or dobrasko@scdah.state.sc.us. If you have questions on archaeological issues, please contact Chuck Cantley at (803) 896-6181 or ccantley@scdah.state.sc.us.

Sincerely,

Rebekah Dobrasko

Rebekah Dobrasko
Review and Compliance Coordinator
State Historic Preservation Office

cc: Keith Derting, SCIAA
Natalie Adams, New South

SCE&G
A SCANA COMPANY

April 9, 2007

Tim Hall, Field Supervisor
U.S. Fish and Wildlife Service
Charleston Ecological Services office
176 Croghan Spur Road, Suite 200
Charleston, SC 29407

SUBJECT: Virgil C. Summer Nuclear Station
New Nuclear Deployment Project
Request for Information on Threatened or Endangered Species

Dear Mr. Hall:

South Carolina Electric and Gas Company (SCE&G) is preparing an application to the U.S. Nuclear Regulatory Commission (NRC) for a combined construction permit and operating license (COL) that would allow SCE&G to build and operate up to two additional nuclear units at the Virgil C. Summer Nuclear Station (VCSNS) site in Fairfield County, South Carolina. Although SCE&G is preparing the COL application, the proposed nuclear units are a joint venture between SCE&G and the South Carolina Public Service Authority, commonly referred to as "Santee Cooper." The new units would be jointly owned by SCE&G and Santee Cooper, but would be operated by SCE&G.

As part of the licensing process, the NRC requires applicants to "assess the impact of the proposed action on threatened or endangered species in accordance with the Endangered Species Act" (10 CFR 51.53). The NRC will request a formal consultation with your office at a later date under Section 7 of the Endangered Species Act. By contacting you early in the application process, we hope to identify any issues that need to be addressed or any information your office may need to expedite the NRC consultation.

The VCSNS site is approximately 15 miles west of the Fairfield County seat of Winnsboro. The closest population center (i.e., having more than 25,000 residents) to the site is Columbia, South Carolina, approximately 14.5 miles southeast of the VCSNS (see attached Figure 2.1-2). The closest community is Jenkinsville, less than 3 miles southeast of the site (see attached Figure 2.1-3).

The existing VCSNS (Unit 1) generating facilities and switchyard are located on the south shore of Monticello Reservoir (see attached Figure 2.1-1). VCSNS Units 2 and 3 and supporting infrastructure would be built approximately one mile south-southwest of Unit 1. A nuclear exclusion zone, defined as the area within approximately one mile of Unit 1 combined with the area 3,390 feet from the center of proposed Units 2 and 3, would be posted and access to land portions of this area would be controlled. The boundary of the exclusion zone, shown on attached Figure 2.1-1, also defines the site boundary. The VCSNS property, thus defined, covers

approximately 2,560 acres, and includes the southern portion of Monticello Reservoir and parts of the Fairfield Pumped Storage Facility (see Figure 2.1-1).

SCE&G has owned and operated VCSNS Unit 1 and associated transmission lines since 1982. Attached Figure 2.2-3 shows these existing transmission lines, which cross portions of Fairfield, Lexington, Newberry, Richland and Saluda counties. New transmission lines would be built to connect Units 2 and 3 to the regional transmission system. Although the precise routes of the new lines have not been selected, and will not be selected until NRC approves the COL, termination points (substation locations) for the lines have been determined and are shown in attached Figure 2.2-4. These new lines will cross portions of ten South Carolina counties: Calhoun, Chester, Colleton, Dorchester, Fairfield, Hampton, Lancaster, Lexington, Orangeburg, and Richland.

Based on a review of historical documents and information on the South Carolina Department of Natural Resources website (county records of "rare, threatened, and endangered species") and on-site surveys by SCE&G biologists, SCE&G believes that the only federally listed species to occur on the VCSNS site proper is the bald eagle (*Haliaeetus leucocephalus*). Bald eagles nest on Monticello Reservoir and Parr Reservoir, the water body immediately to the west. Three listed bird species, the bald eagle, red-cockaded woodpecker (*Picoides borealis*) and the wood stork (*Mycteria americana*), have been recorded in the ten counties associated with VCSNS and the proposed transmission lines. One each federally listed fish, reptile, and mollusk are known to occur in the counties that would be crossed by the proposed transmission lines. The shortnose sturgeon (*Acipenser brevirostrum*) is found in several Coastal Plain counties that would be crossed by proposed transmission lines and the loggerhead sea turtle (*Caretta caretta*) is known to nest on beaches in Colleton County. The Carolina heelsplitter (*Lasmigona decorate*) occurs in two Chester County streams. Six federally listed vascular plants and one candidate vascular plant occur in the counties containing the plant site and proposed transmission lines. The six federally-listed plant species that occur in the ten-county project area are smooth coneflower (*Echinacea laevigata*), rough-leaved loosestrife, Canby's dropwort (*Oxypolis canbyi*), pool sprite (*Amphianthus pusillus*), Schweinitz's sunflower (*Helianthus schweinitzii*), and black-spored quillwort (*Isoetes melanospora*). The candidate species, Georgia aster (*Aster georgianus*), occurs in Chester County and Fairfield County, where VCSNS is located.

SCE&G conducted field surveys at VCSNS and along associated transmission line corridors in 2002 to update information on ecological resources, with emphasis on threatened and endangered species. Information obtained during the surveys was used to evaluate potential impacts to threatened and endangered species from continued operation of VCSNS over the license renewal term and to assist the U.S. Nuclear Regulatory Commission (NRC) in its consultations with state and federal agencies during the VCSNS license renewal process.

The bald eagle was the only listed animal species observed during the 2002 surveys. Bald eagles are commonly observed foraging around Monticello Reservoir, Parr Reservoir, and on the Broad River downstream of Parr Shoals Dam. Although several rare and unusual plants were discovered during the surveys [e.g., bog-mint (*Macbridea carolinia*) and American columbo (*Frasera caroliniensis*)], no state- or federally listed plant species were found.

The on-site surveys conducted in 2002 focused on SCE&G property within the nuclear exclusion zone, which is approximated by a 1-mile radius centered on the VCSNS reactor. Based on the current site plan, portions of the new facility would be located outside the existing nuclear exclusion zone in an area that was not evaluated during the 2002 surveys. SCE&G conducted field surveys of the area proposed for the new facility in summer and fall 2006 to ascertain if any

sensitive species or habitats were present, and will be conducting a spring survey in 2007. No listed species were found in 2006.

We would appreciate your providing a letter detailing any concerns you may have about any listed species or critical habitat in the areas potentially affected by construction and operation of the new generating facilities and associated transmission lines. SCE&G will include a copy of this letter and your response in the Environmental Report that will be submitted to the NRC as part of the VCSNS license application.

Please contact Steve Summer, 803-217-7357, if you have any questions.

Sincerely,

Al Paglia
Manager, Nuclear Licensing

Enclosure: Figures

cc: Randy Mahan
Hagood Hamilton
Ken Browne
Steve Connor
Jan Renfro
Steve Summer
April Rice
Kathryn Sutton
NND-07-0004 (1080)

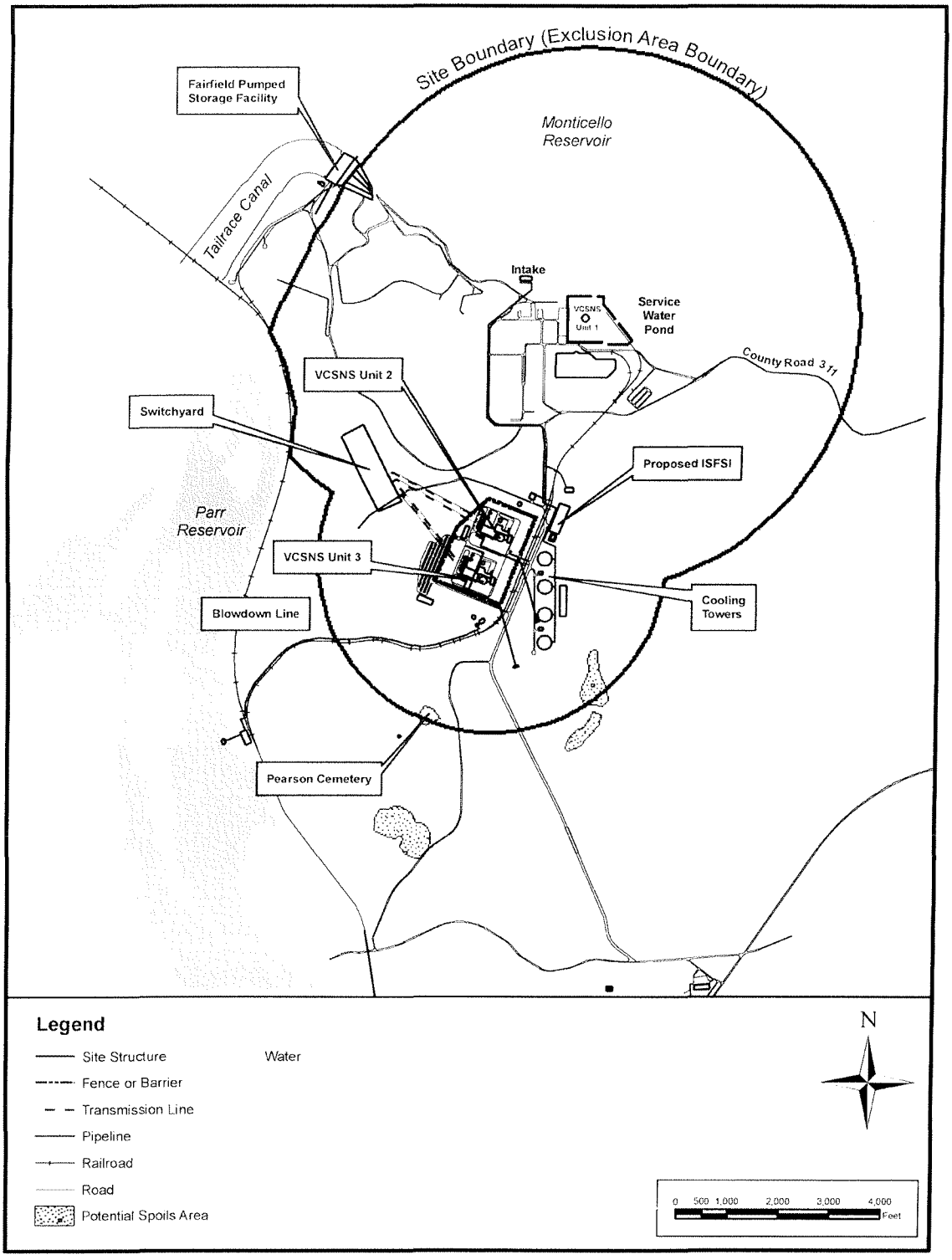

Figure 2.1-1 VCSNS Site and Proposed Plant Footprint

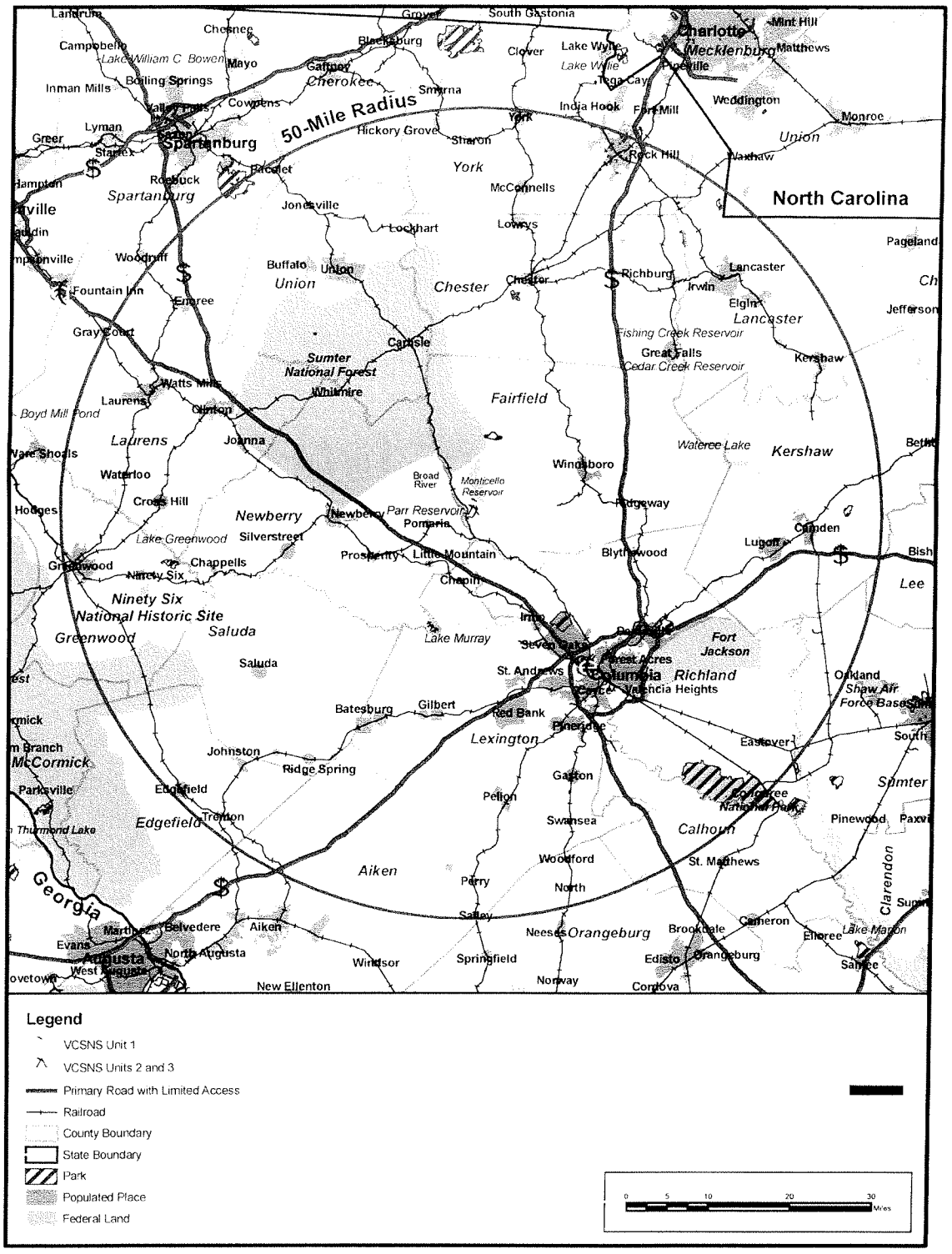

Figure 2.1-2 50-Mile Vicinity

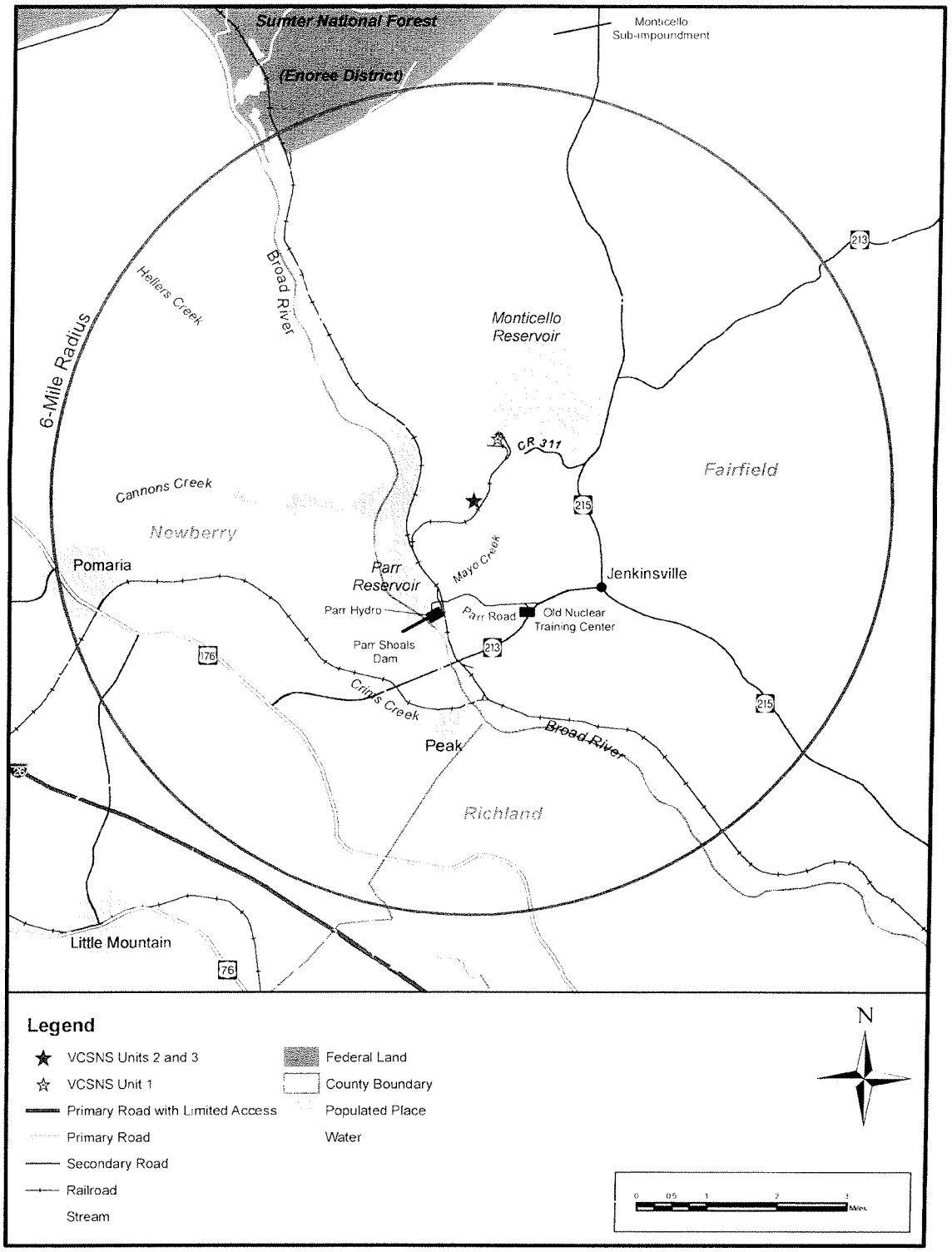

Figure 2.1-3 6-Mile Vicinity

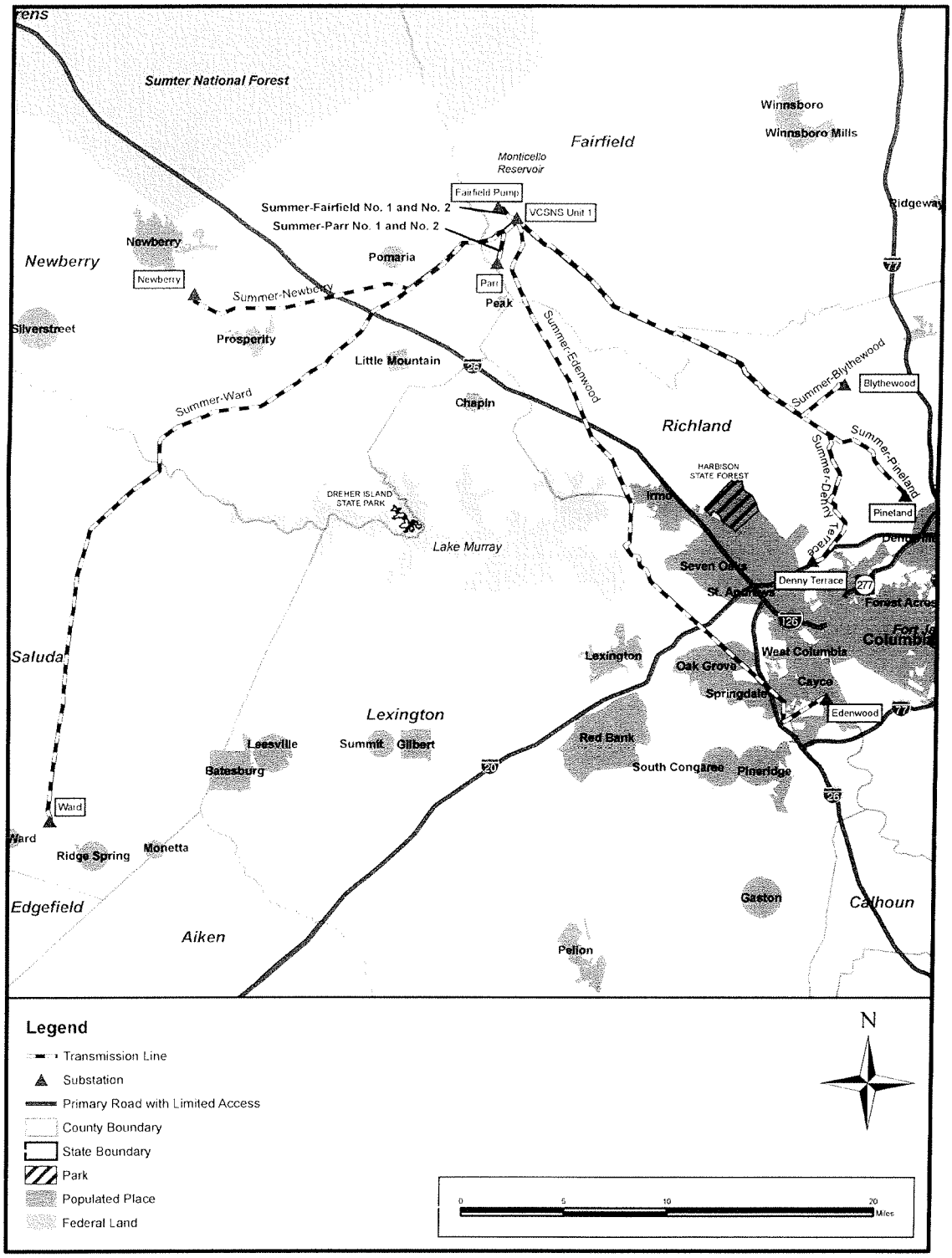

Figure 2.2-3 Existing Transmission System for VCSNS Unit 1

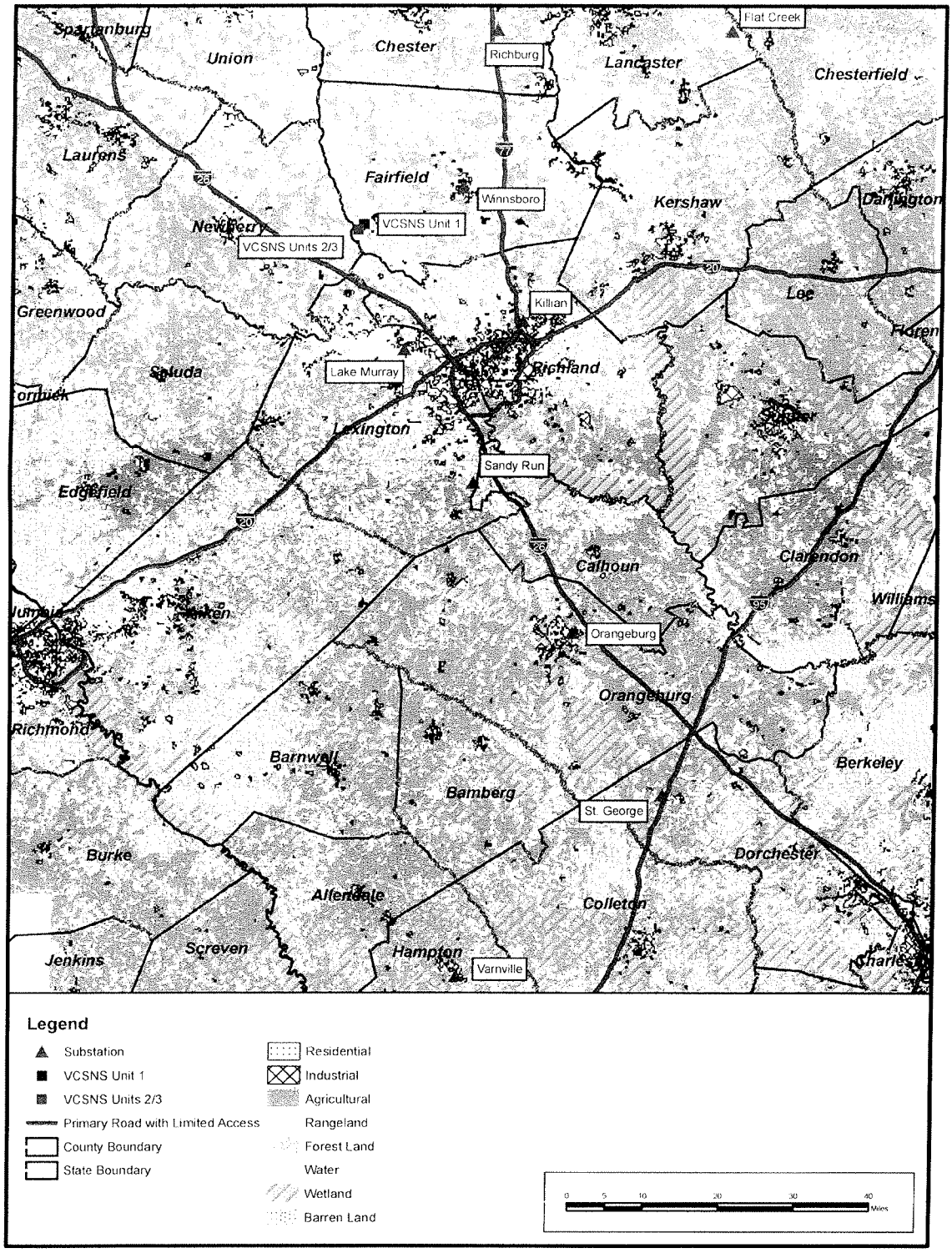

Figure 2.2-4 Land Uses in Counties Affected by the Proposed New Transmission Lines

United States Department of the Interior

FISH AND WILDLIFE SERVICE
176 Croghan Spur Road, Suite 200
Charleston, South Carolina 29407

May 11, 2007

Mr. Al Paglia
SCE&G
New Nuclear Deployment
P.O. Box 88; MC P40
Jenkinsville, SC 29065

Re: Virgil C. Summer Nuclear Station
Fairfield County, South Carolina
FWS Log No: 2007-TA-0385

Dear Mr. Paglia:

The U.S. Fish and Wildlife Service (Service) has reviewed your April 9, 2007, letter requesting information on the proposed construction of the above-referenced project. The proposed project would involve construction and operation of two additional nuclear units at the Virgil C. Summer Nuclear Station in Fairfield County, South Carolina. The project also proposes to construct new transmission lines across portions of Calhoun, Chester, Colleton, Dorchester, Fairfield, Hampton, Lancaster, Lexington, Orangeburg, and Richland Counties. Routes for these transmission lines have not yet been determined and therefore the Service cannot address concerns relating to this portion of the proposed project. Species lists for the aforementioned counties can be found on the Service's Charleston Field Office website: http://www.fws.gov/charleston/. These lists include known occurrences and areas where rare species have a high possibility of occurring, and can aid you in determining the impacts your project may have on protected species. We do have comments and concerns regarding several species known to occur in the project footprint. The following comments are provided in accordance with the Fish and Wildlife Coordination Act, as amended (16 U.S.C. 661-667e), and section 7 of the Endangered Species Act (Act), as amended (16 U.S.C. 1531-1543).

Based on our records and your environmental assessment, a bald eagle nest is known from the Monticello Reservoir at the existing nuclear station. Disturbance of a nesting pair of eagles that results in behavioral modifications or nest abandonment constitutes take under the Act. To avoid disturbance the Service requests that construction activities be conducted outside of the nesting season (October 1 through May 15) or if construction

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occurs within the nesting season, all activities should maintain a 1500-ft minimum buffer around the nest.

The Carolina heelsplitter is an endangered freshwater mussel, known to occur in nine South Carolina counties, including Chester and Lancaster (see attached map). The Carolina heelsplitter requires cool flowing stream conditions with good water quality and stable stream banks. Removal of riparian vegetation can compromise water quality and stream bank integrity as well as increasing stream temperatures. The Service requests the opportunity to review any transmission line or substation construction proposed within Carolina heelsplitter watersheds. Figure 2.2-4 in the submitted information package indicates substations on Flat Creek in Lancaster County and another in Richburg, Chester County. As both of these locations are within known Carolina heelsplitter watersheds, plans for these substations should be coordinated with the Service prior to construction to prevent potential adverse impacts to the heelsplitter.

Extant populations of robust redhorse, a candidate species for listing, are found in the Broad River above and below Parr Reservoir. The Service is concerned about the possibility of entrainment and entrapment of these and other rare fishes at the proposed water intake. To minimize impingement mortality, we recommend intake flows less than or equal to 0.5 feet per second. We also request additional information regarding potential affects resulting from thermal increases downstream of plant discharges. Although candidate species are not afforded full protection under the Endangered Species Act, we request your assistance in conserving this rare species, thus preventing the need for future listing.

In addition to following all standard Best Management Practices, the Service offers the following general recommendations to prevent adverse water quality impacts during construction and maintenance of transmission lines:

1. Minimal soil disturbance while clearing the transmission corridor. Appropriate erosion control measures, such as silt fences, silt barriers or other devices should be placed between the disturbed area and the affected waterway prior to any land disturbing activity. Erosion control should be maintained in a functioning capacity until the area is permanently stabilized.
2. Vegetation surrounding all stream crossings should be maintained intact to stabilize stream banks and minimize sediment inputs as a result of construction. If existing vegetation must be removed from the buffer zone, cutting should be done by hand; no machinery should be permitted in or adjacent to the stream. Any riparian buffer that requires cutting should be replanted as soon as possible to avoid possible erosion. A list of low-growing shrubs and small trees that could be planted on stream banks is provided below.
3. Herbicide application should be avoided within a 100 foot buffer area surrounding streams. Streamside buffers should be posted with sufficient signage to inform pesticide administrators of application restrictions.

Suggestions for low growing vegetation on stream banks:

SHRUBS:
yaupon holly
gallberry
dahoon
wax myrtle
blueberry
dwarf huckleberry
hawthorn
wild plum
serviceberry
smooth sumac
winged sumac
American beautyberry
alder
red buckeye

SMALL TREES:
sassafras
flowering dogwood
silky dogwood (if a wet site)
redbud
American holly

Your interest in ensuring the protection of endangered species is appreciated. If you have further questions or require additional information, please contact Lora Zimmerman of this office at (843) 727-4707 ext. 226. In future correspondence concerning this project, please reference FWS Log No. 2007-TA-0385.

Sincerely,

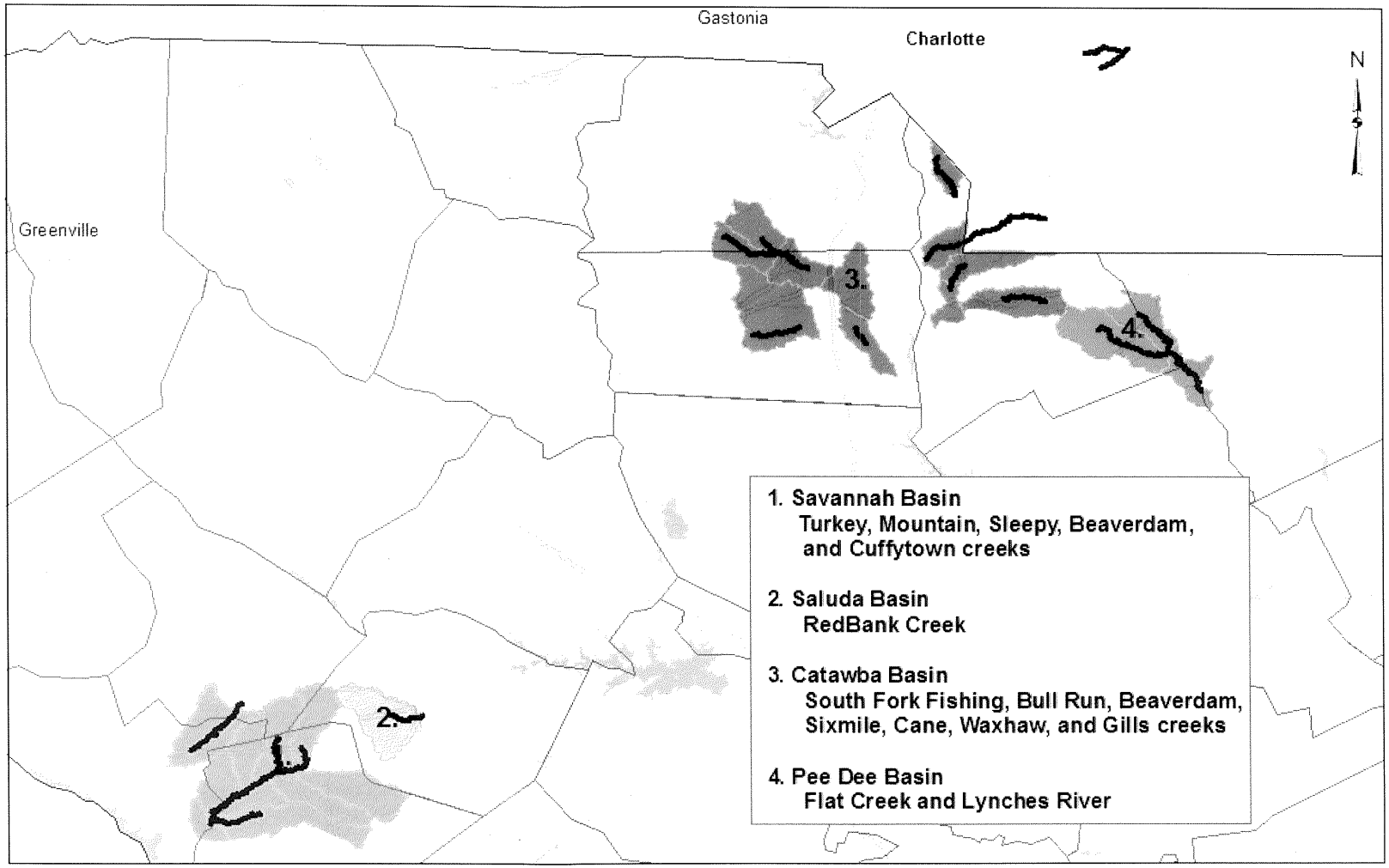
Timothy N. Hall
Field Supervisor

TNH/LLZ

Attachment

U.S. Fish and Wildlife Service

SOUTH CAROLINA WATERSHEDS CONTAINING CAROLINA HEELSPLITTER



Produced by:
Charleston Ecological Services Field Office
176 Croghan Spur Road; Suite 200
Charleston, SC 29412
January, 2007

Miles: 0 4 8 16 24 32
Kilometers: 0 5 10 20
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Red = populations with designated Critical Habitat
Blue = populations without Critical Habitat designation

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April 9, 2007

Ms. Julie Holling
South Carolina Department of Natural Resources
Heritage Trust Section
1000 Assembly Street
Columbia, SC 29201

SUBJECT: Virgil C. Summer Nuclear Station
New Nuclear Deployment Project
Request for Information on Threatened or Endangered Species

Dear Ms. Holling:

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SCE&G | New Nuclear Deployment • P. O. Box 88 • MC P40 • Jenkinsville, South Carolina 29065 • www.sceg.com

approximately 2,560 acres, and includes the southern portion of Monticello Reservoir and parts of SCE&G's Fairfield Pumped Storage Facility (see Figure 2.1-1).

SCE&G has owned and operated VCSNS Unit 1 and associated transmission lines since 1982. Attached Figure 2.2-3 shows these existing transmission lines, which cross portions of Fairfield, Lexington, Newberry, Richland and Saluda counties. New transmission lines would be built to connect Units 2 and 3 to the regional transmission system. Although the precise routes of the new lines have not been selected, and will not be selected until NRC approves the COL, termination points (substation locations) for the lines have been determined and are shown in attached Figure 2.2-4. These new lines will cross portions of ten South Carolina counties: Calhoun, Chester, Colleton, Dorchester, Fairfield, Hampton, Lancaster, Lexington, Orangeburg, and Richland.

Based on a review of historical documents and information on the South Carolina Department of Natural Resources website (county records of "rare, threatened, and endangered species") and on-site surveys by SCE&G biologists, SCE&G believes that the only federally listed species to occur on the VCSNS site proper is the bald eagle (*Haliaeetus leucocephalus*). Bald eagles nest on Monticello Reservoir and Parr Reservoir, the water body immediately to the west. Three listed bird species, the bald eagle, red-cockaded woodpecker (*Picoides borealis*) and the wood stork (*Mycteria americana*), have been recorded in the ten counties associated with VCSNS and the proposed transmission lines. One each federally listed fish, reptile, and mollusk are known to occur in the counties that would be crossed by the proposed transmission lines. The shortnose sturgeon (*Acipenser brevirostrum*) is found in several Coastal Plain counties that would be crossed by proposed transmission lines and the loggerhead sea turtle (*Caretta caretta*) is known to nest on beaches in Colleton County. The Carolina heelsplitter (*Lasmigona decorate*) occurs in two Chester County streams. Six federally listed vascular plants and one candidate vascular plant occur in the counties containing the plant site and proposed transmission lines. The six federally-listed plant species that occur in the ten-county project area are smooth coneflower (*Echinacea laevigata*), rough-leaved loosestrife, Canby's dropwort (*Oxypolis canbyi*), pool sprite (*Amphianthus pusillus*), Schweinitz's sunflower (*Helianthus schweinitzii*), and black-spored quillwort (*Isoetes melanospora*). The candidate species, Georgia aster (*Aster georgianus*), occurs in Chester County and Fairfield County, where VCSNS is located.

SCE&G conducted field surveys at VCSNS and along associated transmission line corridors in 2002 to update information on ecological resources, with emphasis on threatened and endangered species. Information obtained during the surveys was used to evaluate potential impacts to threatened and endangered species from continued operation of VCSNS over the license renewal term and to assist the U.S. Nuclear Regulatory Commission (NRC) in its consultations with state and federal agencies during the VCSNS license renewal process.

The bald eagle was the only listed animal species observed during the 2002 surveys. Bald eagles are commonly observed foraging around Monticello Reservoir, Parr Reservoir, and on the Broad River downstream of Parr Shoals Dam. Although several rare and unusual plants were discovered during the surveys [e.g., bog-mint (*Macbridea carolinia*) and American columbo (*Frasera caroliniensis*)], no state- or federally listed plant species were found.

The on-site surveys conducted in 2002 focused on SCE&G property within the nuclear exclusion zone, which is approximated by a 1-mile radius centered on the VCSNS reactor. Based on the current site plan, portions of the new facility would be located outside the existing nuclear exclusion zone in an area that was not evaluated during the 2002 surveys. SCE&G conducted field surveys of the area proposed for the new facility in summer and fall 2006 to ascertain if any

sensitive species or habitats were present, and will be conducting a spring survey in 2007. No listed species were found in 2006.

We would appreciate your providing a letter detailing any concerns you may have about any listed species or critical habitat in the areas potentially affected by construction and operation of the new generating facilities and associated transmission lines. SCE&G will include a copy of this letter and your response in the Environmental Report that will be submitted to the NRC as part of the VCSNS license application.

Please contact Steve Summer, 803-217-7357, if you have any questions.

Sincerely,

Al Paglia
Manager, Nuclear Licensing

Enclosure: Figures

cc: Randy Mahan
Hagood Hamilton
Ken Browne
Steve Connor
Jan Renfro
Steve Summer
April Rice
Kathryn Sutton
NND-07-0001 (1080)

3

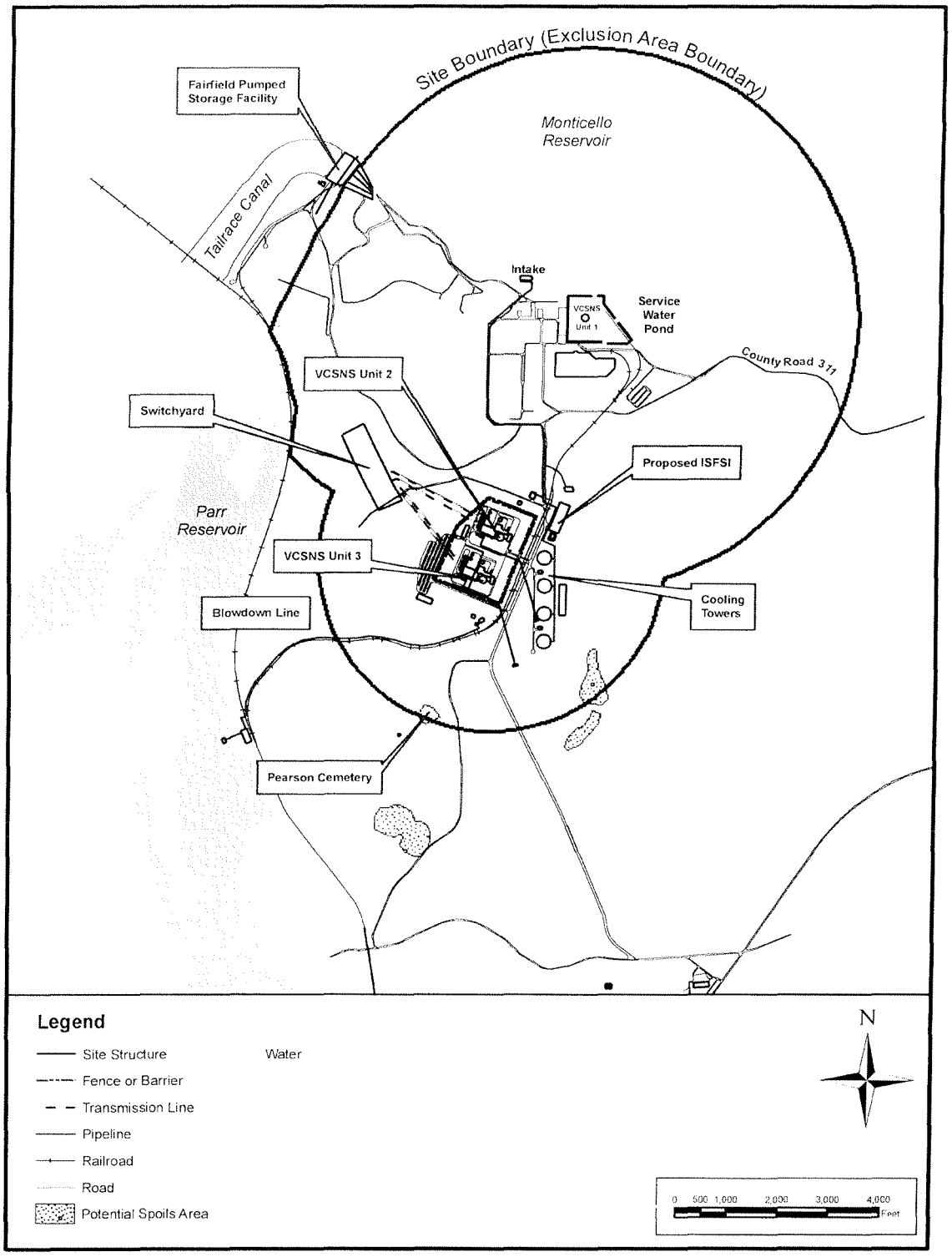

Figure 2.1-1 VCSNS Site and Proposed Plant Footprint

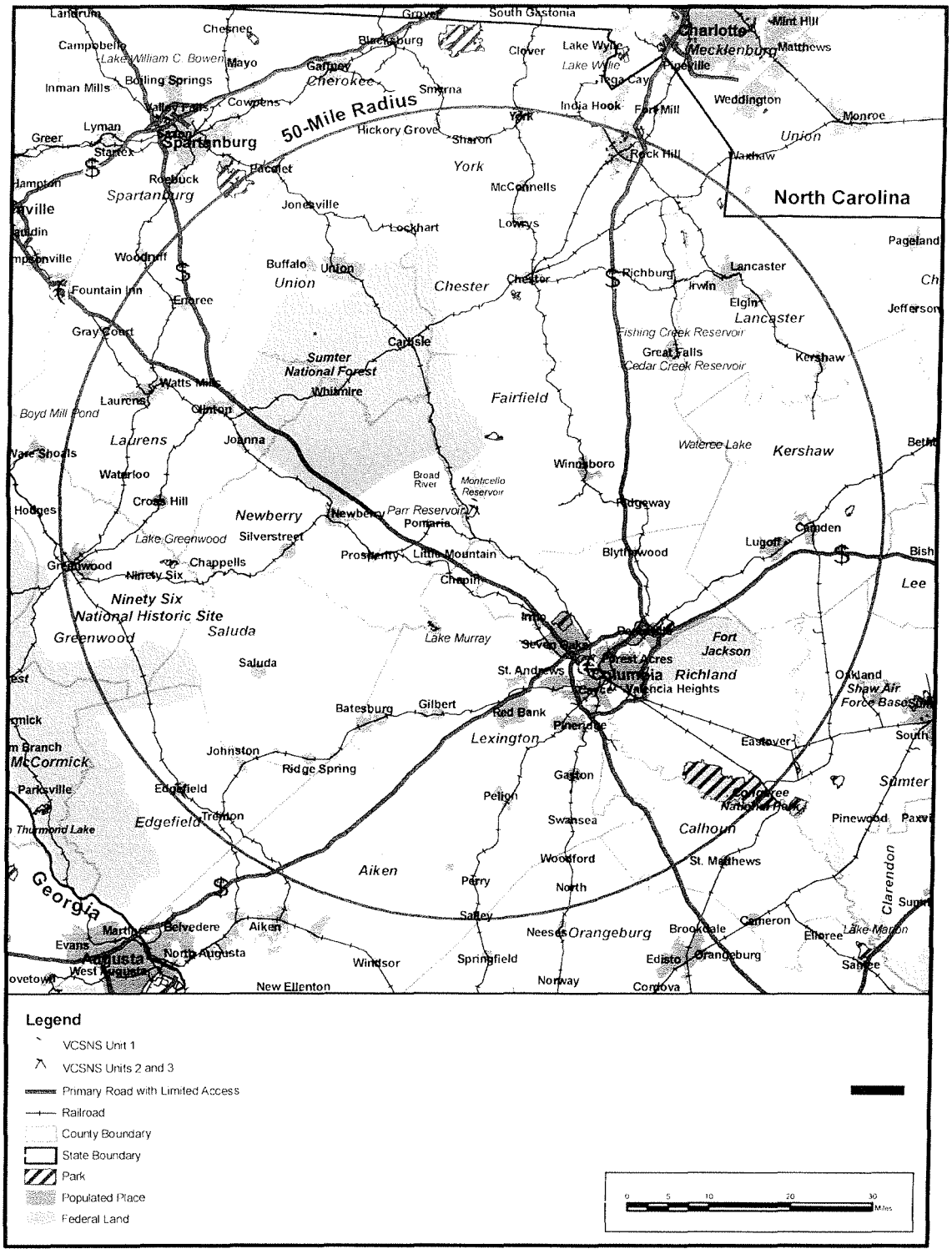

Figure 2.1-2 50-Mile Vicinity

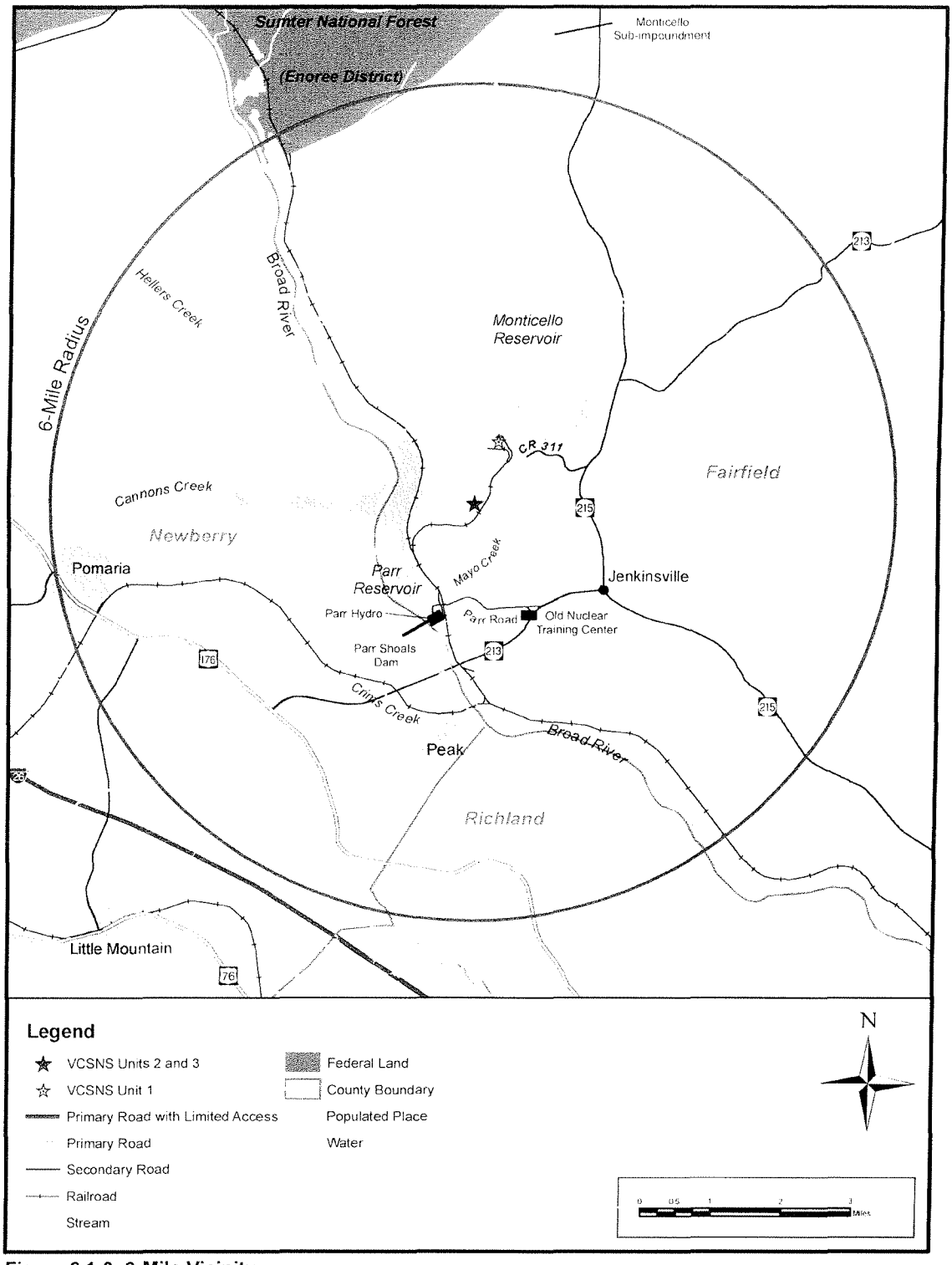

Figure 2.1-3 6-Mile Vicinity

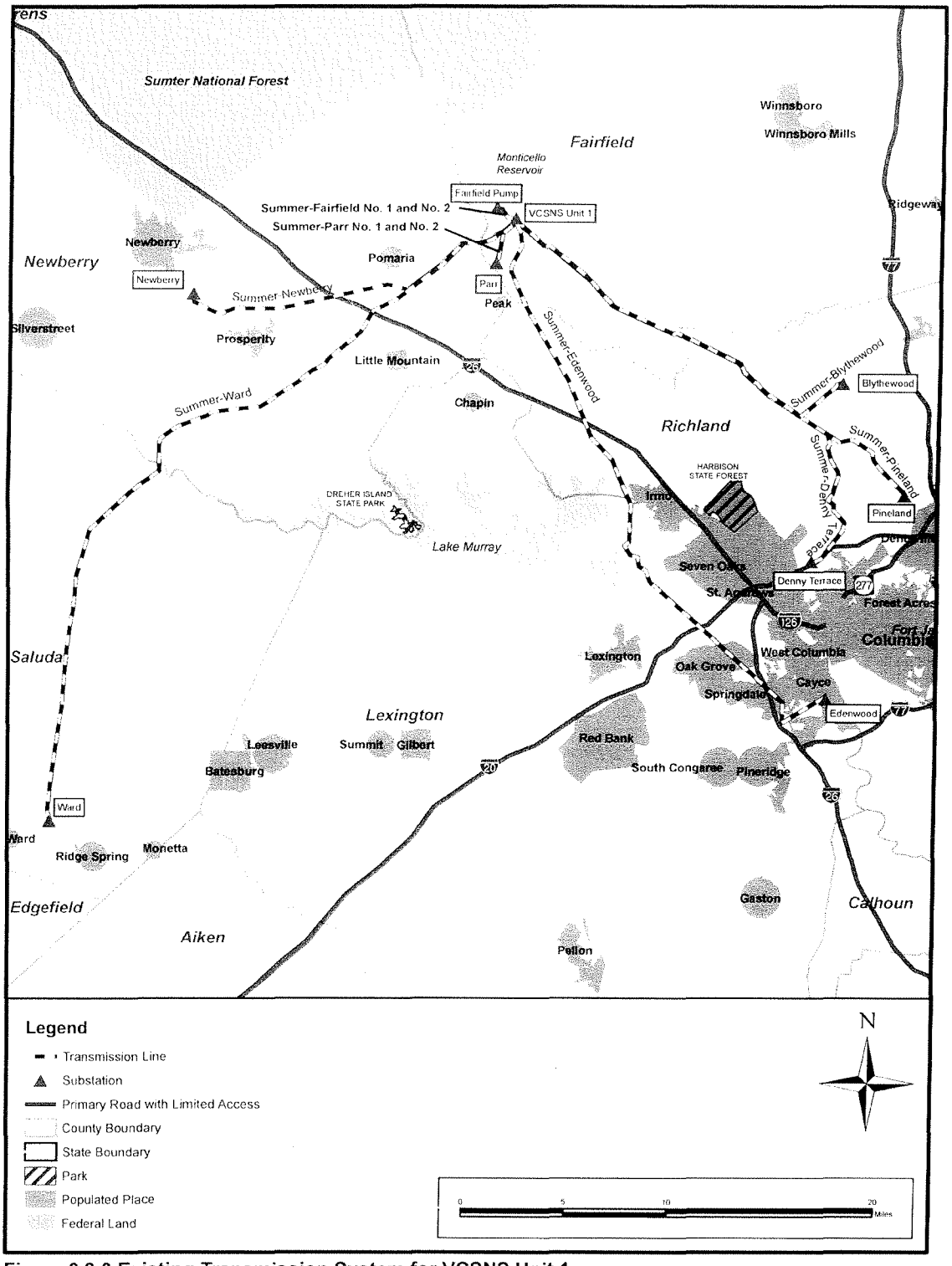

Figure 2.2-3 Existing Transmission System for VCSNS Unit 1

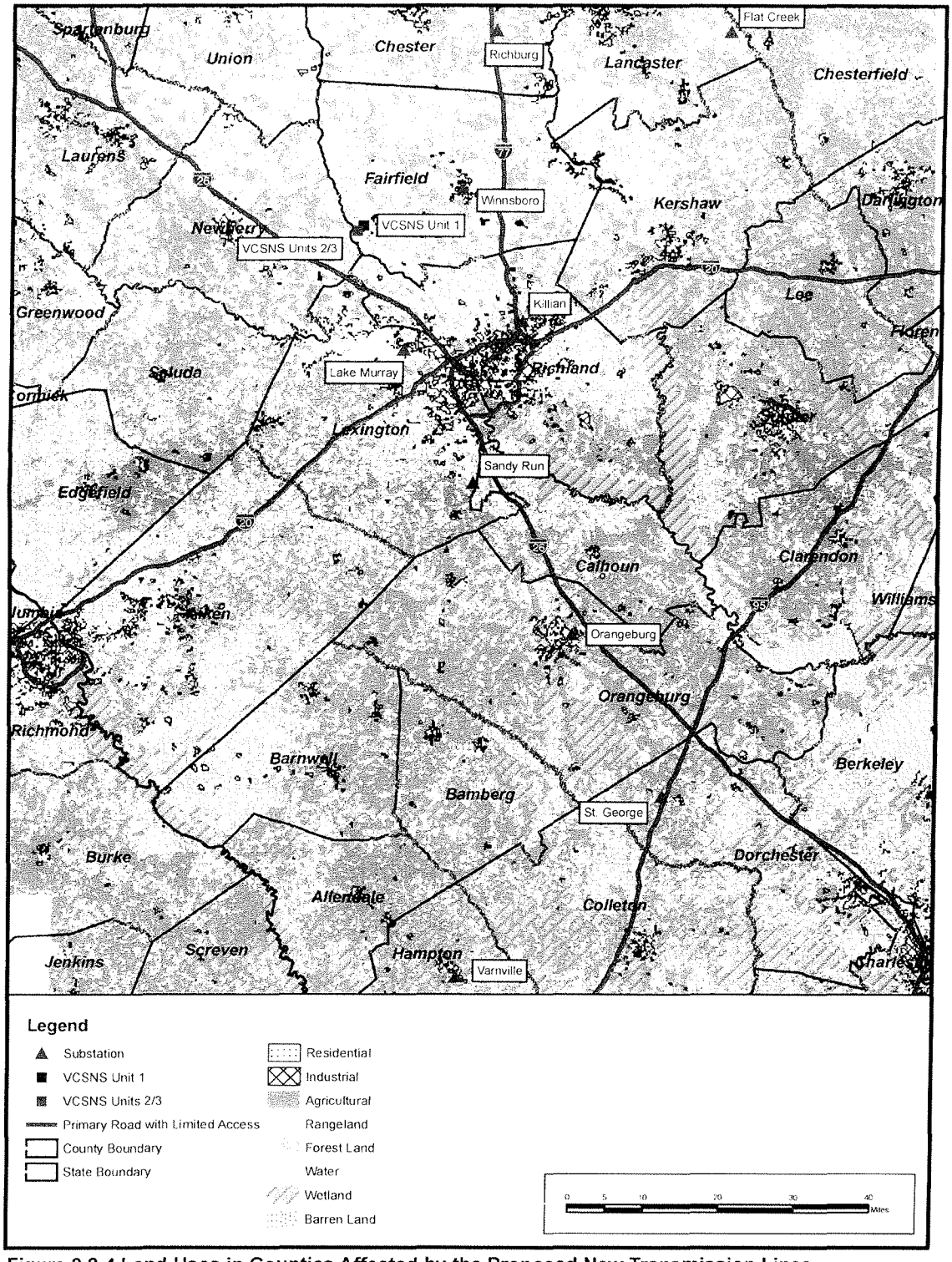

Figure 2.2-4 Land Uses in Counties Affected by the Proposed New Transmission Lines

South Carolina Department of
Natural Resources

John E. Frampton
Director
Alfred H. Vang
Deputy Director for
Land, Water &
Conservation Division

April 20, 2007

Mr. Al Paglia, Manager, Nuclear Licensing
SCE&G, New Nuclear Deployment
P.O. Box 88, MC P40
Jenkinsville, SC 29065

RE: Virgil C. Summer Nuclear Station
New Nuclear Deployment Project
Request for information on Threatened or Endangered Species

Dear Mr. Paglia,

Because our database does not represent a comprehensive biological inventory of the state, I can only verify the known occurrences in the vicinity of your project. There may be occurrences of species in the vicinity of your project area that have not been reported to us. Fieldwork remains the responsibility of the investigator.

I have checked our database, and, as you stated in your letter, the only known occurrences of any federally or state listed species within a mile of the project site are bald eagles (*Haliaeetus leucocephalus*), which is the only listed species known to occur in Fairfield County. As a professional courtesy, we ask that you acknowledge S.C. Heritage Trust as a source of information whenever you use this data in reports.

If you need additional assistance, please contact me by phone at 803/734-3917 or by e-mail at HollingJ@dnr.sc.gov.

Sincerely,

Julie Holling

Julie Holling, Data Manager
SC Department of Natural Resources
Heritage Trust Program

Rembert C. Dennis Building • 1000 Assembly St • P.O. Box 167 • Columbia, S.C. 29202 • Telephone: 803/734-9100
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SCE&G
A SCANA COMPANY

April 9, 2007

Mr. David Bernhart
Assistant Regional Administrator
Southeast Regional Office
National Marine Fisheries Service
263 13th Avenue, S
St. Petersburg, FL 33701

SUBJECT: Virgil C. Summer Nuclear Station
New Nuclear Deployment Project
Request for Information on Threatened or Endangered Species

Dear Mr. Bernhart:

South Carolina Electric and Gas Company (SCE&G) is preparing an application to the U.S. Nuclear Regulatory Commission (NRC) for a combined construction permit and operating license (COL) that would allow SCE&G to build and operate up to two additional nuclear units at the Virgil C. Summer Nuclear Station (VCSNS) site in Fairfield County, South Carolina. Although SCE&G is preparing the COL application, the proposed nuclear units are a joint venture between SCE&G and the South Carolina Public Service Authority, commonly referred to as "Santee Cooper." The new units would be jointly owned by SCE&G and Santee Cooper, but would be operated by SCE&G.

As part of the licensing process, the NRC requires applicants to "assess the impact of the proposed action on threatened or endangered species in accordance with the Endangered Species Act" (10 CFR 51.53). The NRC will request a formal consultation with your office under Section 7 of the Endangered Species Act. By contacting you early in the application process, we hope to identify any issues that need to be addressed or any information your office may need to expedite the NRC consultation.

The VCSNS site is approximately 15 miles west of the Fairfield County seat of Winnsboro. The closest population center (i.e., having more than 25,000 residents) to the site is Columbia, South Carolina, approximately 14.5 miles southeast of the VCSNS (see attached Figure 2.1-2). The closest community is Jenkinsville, less than 3 miles southeast of the site (see attached Figure 2.1-3).

The existing VCSNS (Unit 1) generating facilities and switchyard are located on the south shore of Monticello Reservoir (see attached Figure 2.1-1). The proposed VCSNS Units 2 and 3 and supporting infrastructure would be built approximately one mile south-southwest of Unit 1. A nuclear exclusion zone, defined as the area within approximately one mile of Unit 1 combined with the area 3,390 feet from the center of proposed Units 2 and 3, would be posted and access to

SCE&G | New Nuclear Deployment • P. O. Box 88 • MC P40 • Jenkinsville, South Carolina 29065 • www.sceg.com

land portions of this area would be controlled. The boundary of the exclusion zone, shown on attached Figure 2.1-1, also defines the site boundary. The VCSNS property, thus defined, covers approximately 2,560 acres, and includes the southern portion of Monticello Reservoir and parts of SCE&G's Fairfield Pumped Storage Facility (see Figure 2.1-1).

SCE&G has owned and operated VCSNS Unit 1 and associated transmission lines since 1982. Attached Figure 2.2-3 shows these existing transmission lines, which cross portions of Fairfield, Lexington, Newberry, Richland and Saluda counties. New transmission lines would be built to connect Units 2 and 3 to the regional transmission system. Although the precise routes of the new lines have not been selected, and will not be selected until NRC approves the COL, termination points (substation locations) for the lines have been determined and are shown in attached Figure 2.2-4. These new lines will cross portions of ten South Carolina counties: Calhoun, Chester, Colleton, Dorchester, Fairfield, Hampton, Lancaster, Lexington, Orangeburg, and Richland.

One federally listed anadromous fish under the jurisdiction of the National Marine Fisheries Service (NMFS) is known to occur in the counties that would be crossed by the proposed transmission lines. The endangered shortnose sturgeon (*Acipenser brevirostrum*), a federally endangered species, is known to occur in the Santee River basin in Calhoun, Colleton, Orangeburg, and Richland Counties. Small numbers of shortnose sturgeon ascend the Congaree River from the Santee-Cooper system (Lake Moultrie, Lake Marion, and Rediversion Canal) to spawn near Columbia, South Carolina, approximately 40 miles upstream of Lake Marion. This species has historically been prevented from moving from the Congaree River into the Broad River by the Columbia Diversion Dam, which is associated with a City of Columbia hydroelectric facility (Columbia Canal Hydro). SCE&G, in consultation with state and federal resource agencies, including NMFS, built a fish passage facility at the Columbia Diversion Dam in 2006 that gives migratory fish species access to 25 miles of the Broad River from which they were previously excluded. This could, in theory, allow shortnose sturgeon to move from the Congaree River into the Broad River, and then upstream as far as the Parr Shoals Dam (see Figure 2.1-3). Given that these sturgeon return to natal streams and established spawning areas with a fairly high degree of spawning site fidelity, there is no reason to believe that Santee-Cooper/Congaree River sturgeon would abandon historical spawning areas in the Congaree River to spawn in the Broad River, however. On the other hand, this can't be ruled out as a possibility.

One marine turtle under the protection of NMFS is known to occur in the ten-county project area, according to the South Carolina DNR website. The threatened loggerhead sea turtle (*Caretta caretta*) is known to nest on beaches in Colleton County. Preliminary plans call for a new transmission line crossing the northwest portion of Colleton County, more than 45 miles away from any beaches that might be used by nesting turtles.

We would appreciate your providing a letter detailing any concerns you may have about these species or any other species under the jurisdiction of NMFS that could be affected by construction and operation of the new generating facilities and associated transmission lines. SCE&G will include a copy of this letter and your response in the Environmental Report that will be submitted to the NRC as part of the VCSNS license application.

Please contact Steve Summer, 803-217-7357, if you have any questions.

Sincerely,

Al Paglia
Manager, Nuclear Licensing

Enclosure: Figures

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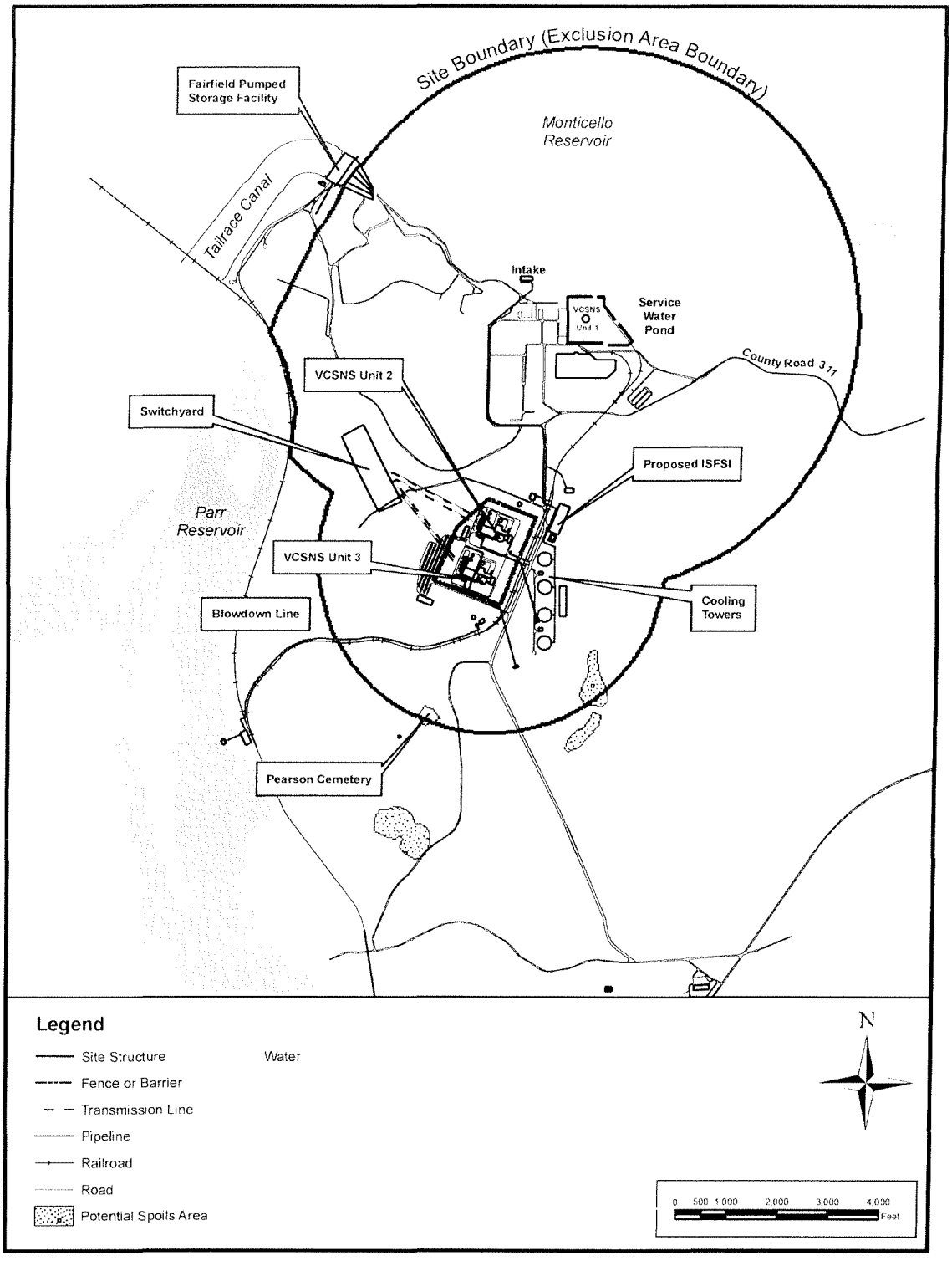

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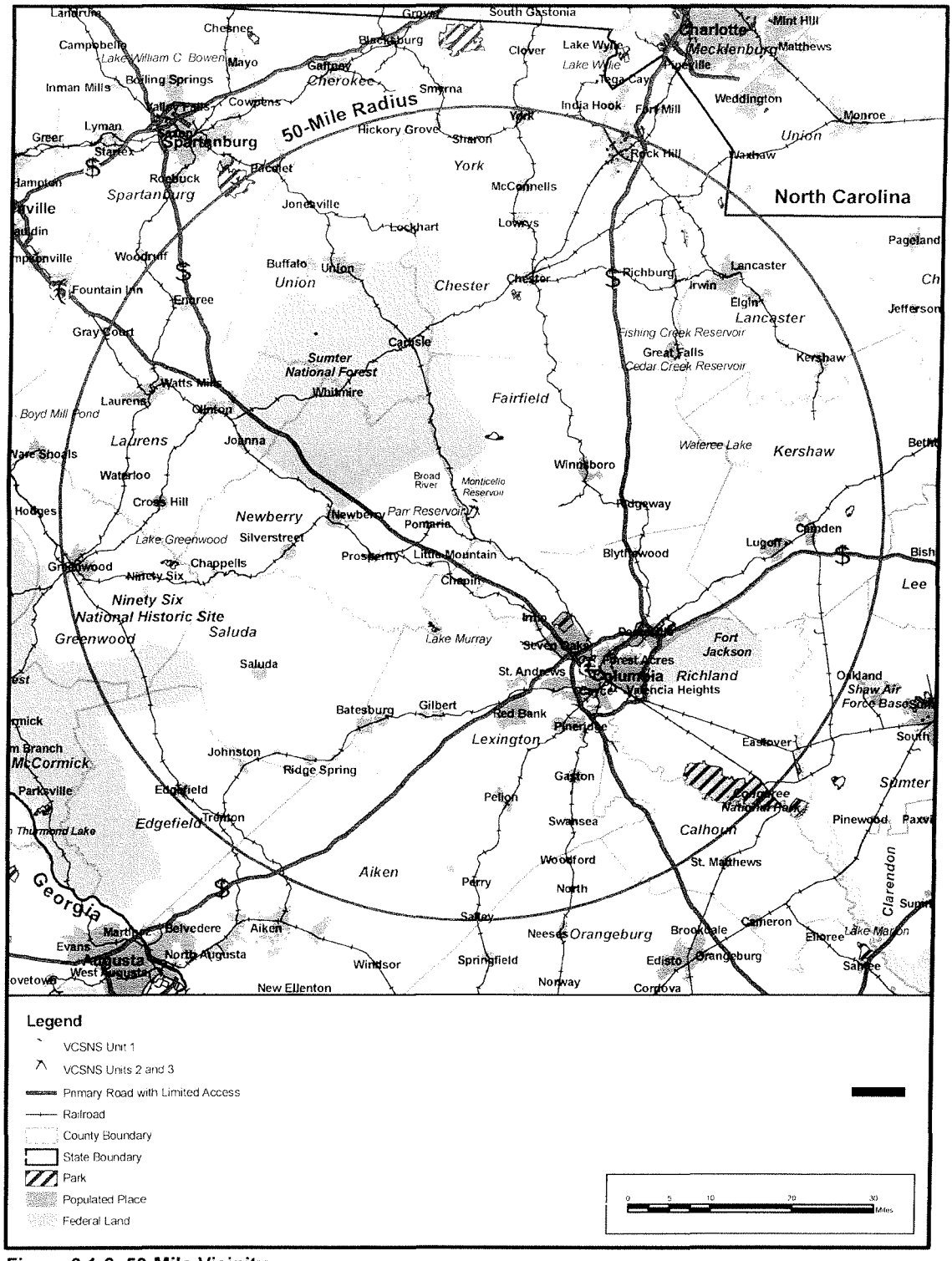

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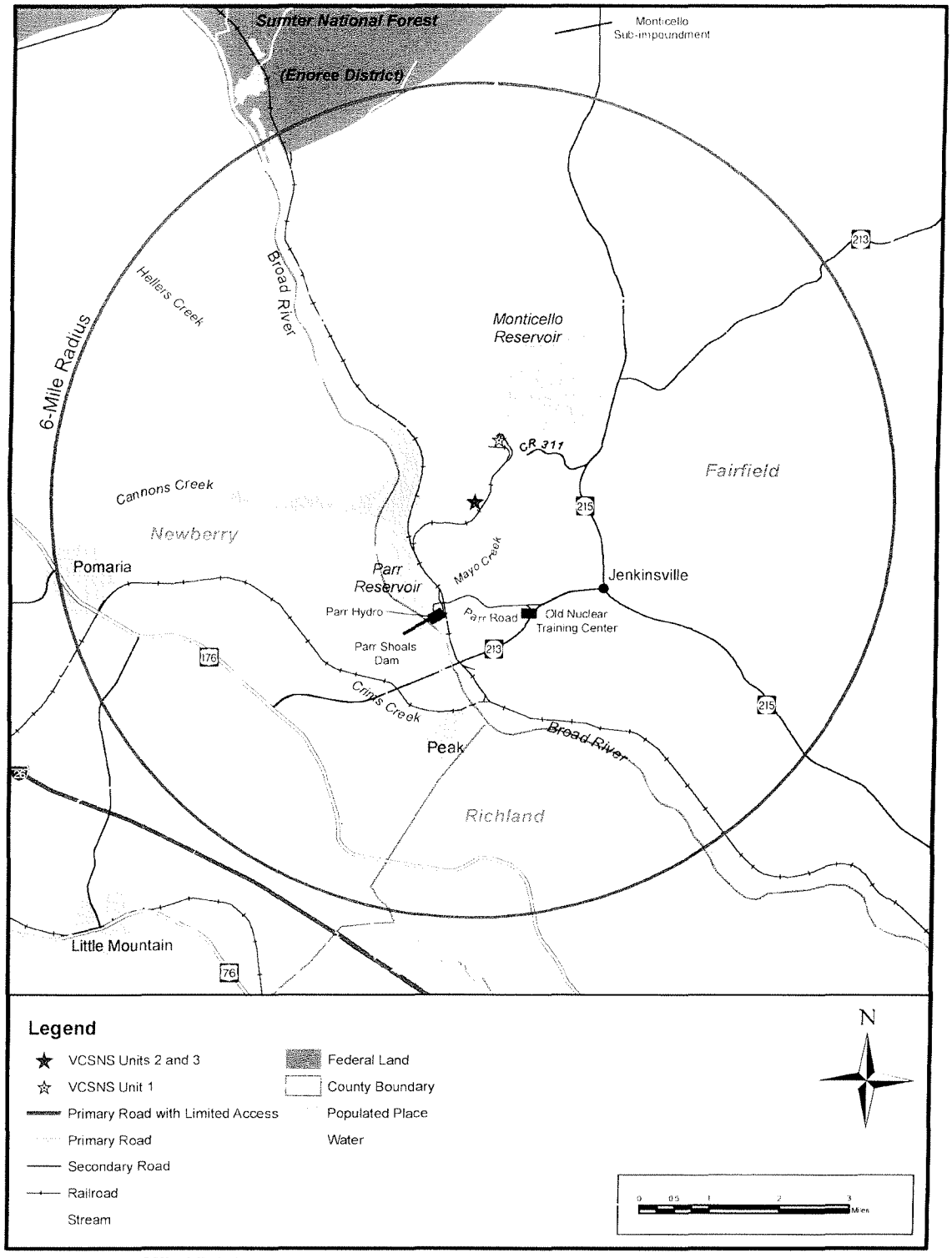

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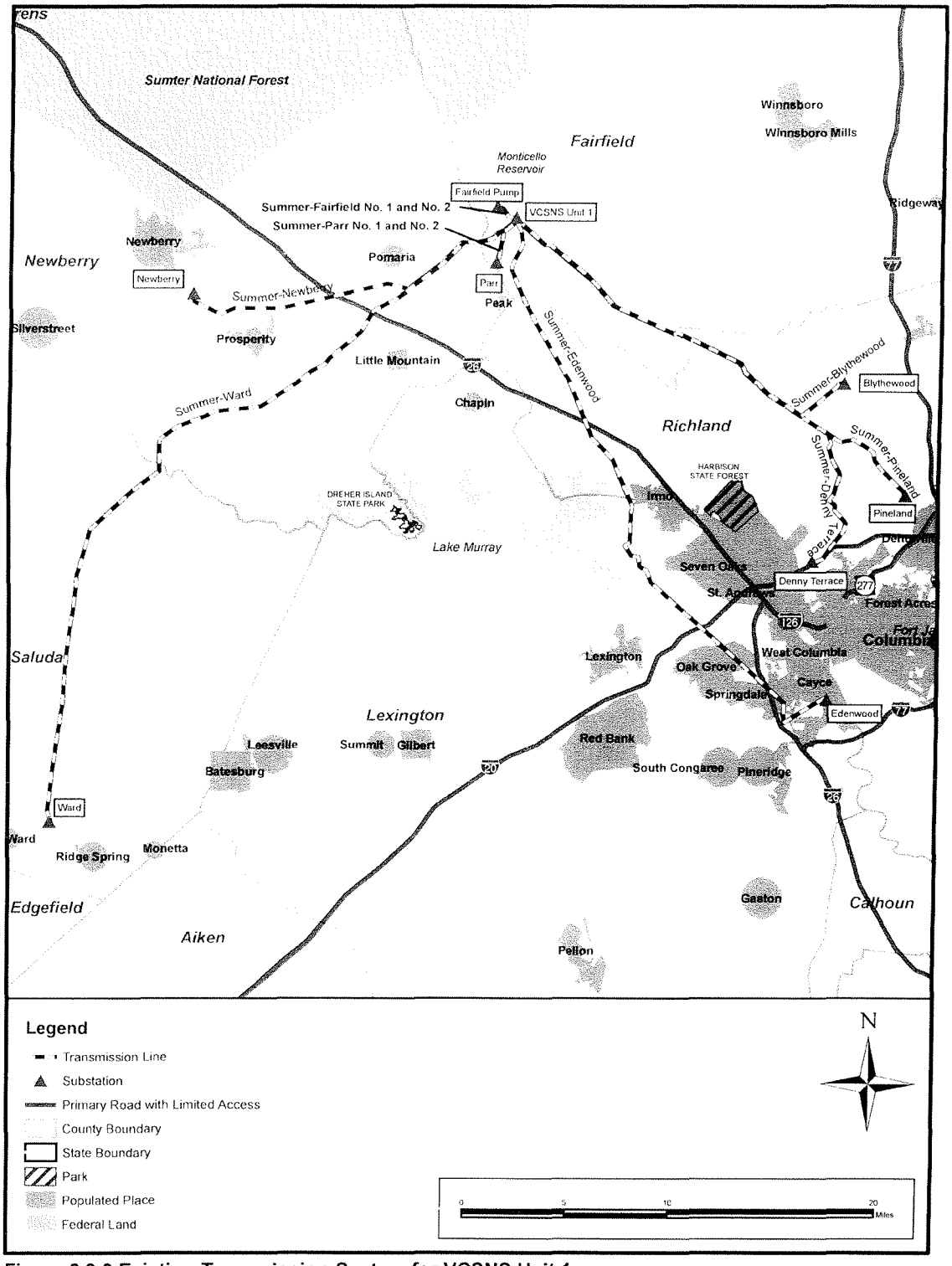

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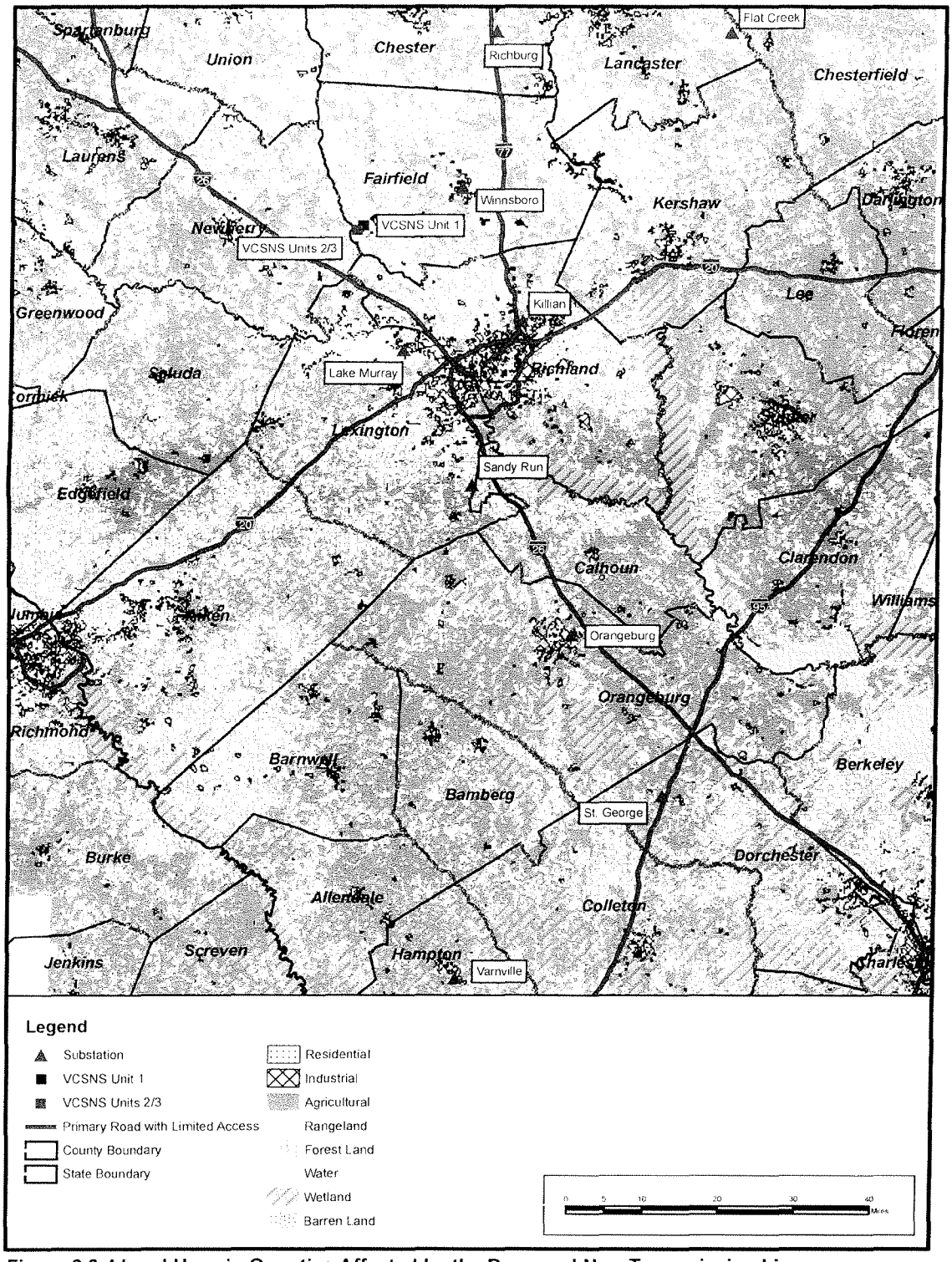

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