

PMNorthAnna3COLPEmails Resource

From: Christopher Cook
Sent: Monday, July 14, 2008 9:26 AM
To: Alicia Williamson
Subject: RE: North Anna Site Audit Open Items
Attachments: Site Audit_Open Items-AW comments.doc

Alicia,

What's the status on these? Where all the Discipline=Hydrology items converted into RAIs? Is there a place where I should be looking to find out this information?

Thanks...Chris

From: Alicia Williamson
Sent: Tuesday, May 13, 2008 1:35 PM
To: Andrew Kugler; Christopher Cook; Daniel Mussatti; Edward Fuller; Irene Yu; John Cook; Laura Quinn; Mark McBride; Michael Masnik; Rafael Rodriguez; Richard Emch
Cc: Sandusky, William F III; Davis, Adam J
Subject: North Anna Site Audit Open Items

Everyone

Attached is the list of open items I plan to try and close with Dominion over the next week or so. Items that are not resolved has the potential to become an RAI. I know I am little behind on this, I apologize for not getting it to you sooner. If there is anything that was omitted please let me know immediately.

Each column has been highlighted with a different color that indicates were I think the request will shake out. A legend is provided in the footer at the bottom of the page. Please let me know if you do not agree and would like to discuss.

Thanx
Alicia

Hearing Identifier: NorthAnna3_Public_EX
Email Number: 131

Mail Envelope Properties (Christopher.Cook@nrc.gov20080714092600)

Subject: RE: North Anna Site Audit Open Items
Sent Date: 7/14/2008 9:26:04 AM
Received Date: 7/14/2008 9:26:00 AM
From: Christopher Cook

Created By: Christopher.Cook@nrc.gov

Recipients:
"Alicia Williamson" <Alicia.Williamson@nrc.gov>
Tracking Status: None

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MESSAGE	1143	7/14/2008 9:26:00 AM
Site Audit_Open Items-AW comments.doc		203258

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
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Open Items for the North Anna Site Audit April 14-18, 2008

#	Open Items	Discipline	Reviewer
1	Provide supplemental information about the proposed 94 acre land purchase including a summary of wetland mapping and report, interaction with ACOE, summary of T&E species walk-over survey, map of habitats on site as of time of purchase with estimate number of acres for each type, and layout of proposed land use and construction layout for the 94 acres. (Note: Mike indicates some of these items have been done. He also understands that it may be premature to request this type of information until the sale of the land has been completed.) Yes this maybe premature. Lets talk about it a little more.	Terrestrial Ecology	Mike Sackschewsky
2	When available, provide information about terrestrial resources within area affected by the heavy haul route improvements, including wetlands and other important habitats, T&E species and methods that will be used to minimize adverse impacts to these resources. (This might not be available—Is this LWA ??.)	Terrestrial Ecology	Mike Sackschewsky
3	Provide updated accounting of habitat types within the construction footprint, the total size of the footprint, and the number of acres of each habitat type within the footprint. Describe the proportion that will be permanently and temporarily impacted by habitat type. Provide an overlay of the construction footprint on a habitat map of the site. (Does exist now.)	Terrestrial Ecology	Mike Sackschewsky
4	Provide documentation of the latest information on site wetland and stream evaluation. Confirm the values of 1.57 acres of non-tidal wetlands permanently disturbed and 3597 feet of stream bed. Describe the mitigation methods that are being considered and or will be employed and the ACOE/VDEQ interaction that support the mitigation decisions. (Does exist now.)	Terrestrial Ecology	Mike Sackschewsky
5	Provide a statement that there is now a great blue heron rookery on Lake Anna and describe the location in relation to the Unite 3 site.	Terrestrial Ecology	Mike Sackschewsky
6	Provide a statement that the nearest bald eagle nest to the site is located within the Contrary Creek drainage west of the Unit 3 site.	Terrestrial Ecology	Mike Sackschewsky
7	Provide a copy of, or website address for, the State Licensing process for the transmission line installation, including the procedures and commitments involved that will cover wetlands and T&E species in the corridor.	Terrestrial Ecology	Mike Sackschewsky
8	Provide a map of the habitat types along the Ladysmith transmission corridor, and the % of each habitat type along the ROW. (Does exist now.)	Terrestrial Ecology	Mike Sackschewsky
9	Describe the interactions the applicant has had with the Natural Heritage Program to perform rare plant surveys in the transmission corridors. Describe the rationale why the Ladysmith corridor has always been a low priority for survey.	Terrestrial Ecology	Mike Sackschewsky
10	Confirm that the noise produced by construction blasting is estimated to be 94 dbA at 50 feet and the attenuation will be 76 dbA at 400 feet.	Terrestrial Ecology	Mike Sackschewsky
11	Provide a copy of the cooling tower noise study including results for all proposed towers.	Terrestrial Ecology	Mike Sackschewsky
12	Provide a copy of the updated SACTI results for salt drift, fogging, and icing for the proposed cooling tower designs. This would include both the main cooling tower and service water service system towers.	Terrestrial Ecology	Mike Sackschewsky

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Army Green= Items that will probably be RAI
Electric Blue=Info to discuss in phonecall
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#	Open Items	Discipline	Reviewer
13	Provide results of, or date of availability for, the lake level effects on wetland around Lake Anna portion of the IFIM study.	Terrestrial Ecology	Mike Sackschewsky
14	Provide documentation and model results regarding the effects of Unit 3 operation on lake level and down stream flows. (This may be met under hydrology open items. Please be sure this was not provided in ESP)	Terrestrial Ecology	Mike Sackschewsky
15	For any NAPS historic PCB spill, verify that the soil was sampled, excavated, and disposed in the appropriate manner. Verify Unit 3 construction activities will not disturb site of PCB spill sites before and during construction. (Question from Mike Masnick. The state is also a good reference for this information, be sure this was not addressed in ESP)	Terrestrial Ecology	Mike Sackschewsky
16	Provide a shapefile of site area, potential new 94 acre purchase area, and transmission line corridor to allow Heritage Program and VDGIF wildlife division to determine occurrences and potential habitat area that may be affected by construction (We need to determine how and when this info on 94 acres will be included) .	Terrestrial Ecology	Mike Sackschewsky
17	Please provide confirmation that barriers will be installed during construction to reduce sediment entrainment to the lake and through the existing units. In review of New and Significant process, this was identified as a commitment, but ER section 4.3 Key Input S4.4-39 did not appear to be provided on CD.	Aquatic Ecology	Jeff Ward Nancy Kohn
18	Please provide the COE (Corps of Engineers) report referenced in S4.4-49 that reviewed the DCR database and did not find threatened or endangered species located on property. (Reference: ER Section 4.3, Significant Evaluation of Key Input S4.4-49.) Find out how we access, who we can call for copy.	Aquatic Ecology	Jeff Ward Nancy Kohn
19	Please provide response or confirmation that the cooling tower design will be within heat duty constraints as specified in a letter from Rich Baker to David Batalo (both Dominion) asking Batalo to "request that GE provide acknowledgement of the defined heat duty constraints and request their commitment to keep within these constraints." (Reference: ER section 5-3, Significant Evaluation, Key Input S5.4-39 This information affects a number of aquatic resource assessment items (e.g., impingement, entrainment, thermal impact)	Aquatic Ecology	Jeff Ward Nancy Kohn
20	With respect to transformer fire event of 1981, please characterize the potential for erosion, resuspension, or transport of PCBs during Unit 3 construction or operation, to the lake, particularly in the vicinity of any intake structures (See response to 15, as well as check to be sure not addressed ESP) .	Aquatic Ecology	Jeff Ward Nancy Kohn
21	Provide a copy of the document "A Monitoring Plan for Lake Anna, the Waste Heat Treatment Facility and the North Anna River" prepared by Environmental Biology, Electric Environmental Services, Dominion Resources Services, dated February 2008 (Where can we access) .	Aquatic Ecology	Jeff Ward Nancy Kohn
22	Provide a copy of the 2005, 2006, and 2007 annual reports titled "Environmental Study of Lake Anna and the Lower Lake Anna River" that were prepared by Environmental Biology, Environmental Services. (Do we copies from ESP? or Are they used in ESP) .	Aquatic Ecology	Jeff Ward Nancy Kohn
23	Provide a description of the revised Intake structure changes for North Anna Unit 3, as compared to that proposed under the ESP.	Aquatic Ecology	Jeff Ward Nancy Kohn
24	Provide electronic copies of input and output files for PAVAN, XOQDOQ, and SACTI runs for North Anna Unit 3. (Is this information different from ESP? If so okay) .	Meteorology	Carl Berkowitz Van Ramsdell

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#	Open Items	Discipline	Reviewer
25	Provide updated information on the direction and distance to each category of receptors (residence, garden, cow, meat animal) (Has this information changed since ESP or does it change with additional 90 acres prop?)	Meteorology	Carl Berkowitz Van Ramsdell
26	Provide information on the monetization of benefits resulting from the construction and operation of Unit 3. (Note: Applicant feels this type of information is not required under current NEPA guidelines. This appears something that will require guidance from OGC if this information is required for the DEIS. Planning a meeting with OGC, they have ruled on this -Will be a RAI)	Socioeconomics Cost Benefits EJ Need for Power	Michael Scott
27	Provide appropriate information of irreversible and irretrievable commitment of resource as listed in Table 10.2- 1 of ESRP10.2.	Socioeconomics Cost Benefits EJ Need for Power	Michael Scott
28	Provide information on irreversibly and irretrievable committed resources as detailed in CFR 51.51.	Socioeconomics Cost Benefits EJ Need for Power	Michael Scott
29	Provide the most recently available (latest update) energy demand forecast for the PJM region as well updated regional population estimate data and forecasts (Or can we access this information?)	Socioeconomics Cost Benefits EJ Need for Power	Michael Scott
30	Reconcile inconsistencies in the estimates for the construction and operation work force numbers cited in Chapter 8 (section 8.0.1.6) with those cited in Chapter 10 (ER Table 10.4.1) and Chapter 3 (ER Table 3.0-2). Chapter 8 and 10 cite values of 2000 construction workers and 500 operational workers, whereas Chapter 3 cites values of 2500-3500 and 500, respectively.	Socioeconomics Cost Benefits EJ Need for Power	Michael Scott
31	Provide information on how electricity price is factored into the PJM forecasting model.	Socioeconomics Cost Benefits EJ Need for Power	Michael Scott
32	Provide a copy of, or reference to, the most recent PJM load forecasting methodology (Can we access this document?)	Socioeconomics Cost Benefits EJ Need for Power	Michael Scott
33	Provide information on the anticipated date of the acquisition of the additional 94 acres near the NAPS site. If acquired, will the additional land be considered part of the NAPS site and will the land be used in conjunction with Unit 3 construction activities?	Land Use	Paul Hendrickson
34	Provide updated information on the land area that would be temporarily disturbed in conjunction with North Anna Unit 3 construction activities.	Land Use	Paul Hendrickson
35	Provide updated information of risk (probability weighted dose) for the severe accident analysis and how that information is evaluated in terms of "new and significant" information. Risk is considered the consequence of the accident times the probability the event will occur.	Accidents	Michael Smith Van Ramsdell

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#	Open Items	Discipline	Reviewer
36	Provide quarterly area TLD data for years 2002-2007 for monitoring location #6 (west protected area fence TLD # 9906) <i>Is this information evaluated in ESP? Why do we need this info?</i>	Health Physics Decommissioning Uranium Fuel Cycle Waste	Greg Stoetzel
37	Dominion will no longer be able to dispose of low-level waste at the Barnwell site starting in June 2008. Describe how low-level waste disposal for Unit 3 site will be accomplished after this date. <i>(Need input from OGC on how to address?)</i>	Health Physics Decommissioning Uranium Fuel Cycle Waste	Greg Stoetzel
38	Provide the Commitment/management practices for new cemetery on the NAPS site and other cultural resources identified on the additional 94 acres that may be acquired. Provide a copy of the cultural resources survey report, or date of availability of the report, for the additional land that may be acquired <i>(Most of this information is covered in the ESP? Maybe in a phone call we can get additional clarification that new cemeteries will be treated as described in ESP. Also, the additional 90 acres info is still in limbo.)</i>	Cultural Resources	Doug McFarland
39	Provide a copy of a view-shed analysis for National Register eligible historic architectural resources located on the present NAPS site and additional property that might be acquired as part of the NAPS site. <i>(See comment to 38)</i>	Cultural Resources	Doug McFarland
40	Provide a list of the reviewers and their respective qualifications as cultural resource subject matter experts that participated in the "new and significant" evaluation process for preparing the cultural resource sections of the Unit 3 ER.	Cultural Resources	Doug McFarland
41	Provide a copy of cultural resource survey reports completed by the Louis Berger Group (2001 report and 2003 letter report) for the North Anna 1& 2 license renewal, and ESP and COL environmental reports <i>(See comment 38)</i> .	Cultural Resources	Doug McFarland
42	Provide a map with construction boundaries (including laydowns) and survey area on a USGS 7.5 minute map.	Cultural Resources	Doug McFarland
43	Provide a written commitment to fence the currently unfenced cemetery 44LS0222 prior to developing area surrounding the cemetery. <i>(See comment to 38)</i>	Cultural Resources	Doug McFarland

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44	<p>Provide information that clearly identifies the lines of communication between the applicant and the Virginia Department of Historic Resources regarding cultural resources related activities for the NAPS site. Provide a copy of written commitments any additionally acquired land, which also addresses the following areas (Discussion with applicant on to clarify timeline of events needed-ESP should have information on protective measures.)</p> <ol style="list-style-type: none"> 1. A commitment or management plan for evaluating sites found during surveys, for eligibility to National Register of Historic Places IF avoidance is not the planned action. 2. A written procedure for establishing protective barriers for all historic sites found that were determined eligible for the National Register of Historic Places, if avoidance is the planned action. 3. If avoidance of located sites is planned, provide a written commitment to do so and schedule for fencing or other physical barrier as a double check. 4. If avoidance is not the planned action, a commitment or a management plan for mitigation of sites to be destroyed in construction. 5. Written commitment/management practices for addressing cultural resources for future ground disturbing work at the NAPS site. 6. Written commitment or management plan for contacting the Virginia Department of Historic Resources in case of an inadvertent or post review discovery. 	Cultural Resources	Doug McFarland
45	Provide calculations and spreadsheets (Water Budget Model) to support the finding that the Unit 3 CIRC and SWS cooling tower designs will result in approximately the same frequency for reduced North Anna Dam flows (i.e., releases of 20 and 40 cfs) as the ESP cooling towers.	Hydrology	Lance Vail Phil Meyer
46	Provide the water quality sampling data collected (and supporting metadata, including date and time of sample collection) as part of the monthly water-quality baseline sampling program as it relates to recent sampling associated with preparation for VPDES permit for Unit 3.	Hydrology	Lance Vail Phil Meyer
47	Provide a copy of, or reference to, the draft 2007 VPDES permit. (Can we ask the state)	Hydrology	Lance Vail Phil Meyer
48	Provide a copy of the design report for the IFIM study (Was this disclosed in ESP?)	Hydrology	Lance Vail Phil Meyer
49	Provide a rationale why are releases at the USGS Partlow-gage were greater than 40 cfs during April 2008 when the water surface elevation of Lake Anna was less than 250 ft?	Hydrology	Lance Vail Phil Meyer
50	Provide the estimated date for completion of the IFIM analysis report and how the NRC may obtain a copy of that report.	Hydrology	Lance Vail Phil Meyer
51	Provide information on how the NRC will be notified of any change in status regarding litigation of the existing VPDES permit for the NAPS site.	Hydrology	Lance Vail Phil Meyer
52	Provide information on how the NRC will be notified of any future discussions with VDEQ regarding possible inter-basin water transfers from James River (or other basins) to Lake Anna.	Hydrology	Lance Vail Phil Meyer

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#	Open Items	Discipline	Reviewer
53	Provide additional information related to alternative circulating water systems. (Note: This information was provided in the ESP ER, so we are not able to request it again unless the information provided in the ESP ER is considered incomplete and supplementary information is required.)	Hydrology	Lance Vail Phil Meyer
54	Provide additional information on intake, discharge, and water treatment alternatives that may not have been addressed in ESP EIS and COLA. (Note: This information was provided in the ESP ER, so we may not be able to request it again.)	Alternatives	Lance Vail Phil Meyer
55	For an alternative coal fired plant, provide information normalized to 1500 MWe for annual coal consumption, quantities of solid waste products (ash and sludge) generated annually, percentage of solid waste products that can likely be recycled and for what uses, landfill acres needed to dispose of solid waste products over the life of the plant, annual emissions of mercury, annual emissions of PM ₁₀ and PM _{2.5} , and annual consumption of limestone used for control of air emissions.	Alternatives	Paul Hendrickson
56	For an alternative natural gas fired plant, provide information normalized to 1500 MWe for annual emissions of PM ₁₀ and PM _{2.5} , and distance to the nearest gas pipeline from the NAPS.	Alternatives	Paul Hendrickson

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ACTION ITEMS (Andrew Kugler NRC):

1. Discuss the need for an annual environmental operating report with Harriet Nash for the environmental protection plan (EPP) template.
2. Discuss with Harriet Nash the approach taken by Dominion of including tables listing planned environmental activities (e.g., Best Management Practices) in the back of the EPP. Would this be a good idea for the template (or at least providing this option)?
3. For the alternative systems design section (Environmental Standard Review Plan (ESRP) 9.4.2), review what information was submitted by Dominion for the early site permit (ESP), both as part of the ESP environmental report (ER) and as responses to requests for additional information (RAIs). Also look to see if there exist any staff analyses of this information.
4. Discuss with the Office of the General Counsel (OGC) and the technical staff the need to put benefits and costs into monetary terms. The applicant didn't do this except in a few cases, and cited National Environmental Policy Act (NEPA) case law as a basis for this approach. The applicant indicated that case law for NEPA would indicate that it isn't necessary to create monetary values for benefits and costs unless they are being created for other reasons. (As an example, a

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rulemaking usually requires a cost-benefit evaluation per the Office of Management and Budget. This information can then be used in NEPA analyses.)

DRAFT

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