

NAPSEISComment Resource

From: Remmers, Kenneth D CIV NSWCCD W Bethesda, 5800 [kenneth.remmers@navy.mil]
Sent: Wednesday, August 13, 2008 2:04 PM
To: NorthAnnaCOLAEIS Resource
Cc: Alicia Williamson; Thomas Kevern; remmerskd@verizon.net
Subject: North Anna COLA comments

August 12, 2008

Comments on COLA for North Anna Unit #3 (Extended period through August 15, 2008)

1. In the FEIS for the ESP, it is stated that The MWC mode would be used when Lake Anna is below 250ft msl for seven consecutive days. DGIF requested a change in this schedule to less than seven days and even when the level is above 250ft msl during certain critical periods. In the submitted Rev 0 of the COLA Final Safety Analysis, page 2-133, Dominion states "if the reservoir water level falls below Elevation 76.2 m (250ft) msl and is not restored within **a reasonable period of time**, the MWC mode is used. Why is the seven continuous days eliminated from discussion and why is the DGIF request ignored?
2. It is our understanding that when the MWC mode is in effect, it will stay there until the water level of the reservoir goes above 250 ft msl. Why on page 2-134 of the FSAR does Dominion say "**While in the MWC mode, the dry tower fans may be turned off to provide additional electrical output during hours of peak demand**"? This is totally against the idea of conserving water and the MWC mode.
3. Why are the Cooling Tower discussions in the FSAR and not in the EIS? Cooling tower discussions were unresolved in the FEIS of the ESP. The IFIM results could impact the amount of water released over the dam as well as any studies of the reservoir levels in the lake itself wrt recreation and safety. NRC should require Dominion put all cooling tower issues in the EIS. This is new and significant information and the NRC should open and address this issue of cooling methods used by Dominion for Unit #3. There may be insufficient water in the reservoir depending on the final IFIM recommendations. Virginia Coastal may not find the project in compliance and may not issue a certification.
4. Wrt Section 316(b), DGIF recommended a 2mm screen intake with intake velocity of 0.25fps. What is the design of this intake screen currently by Dominion? Will they comply with the bmp recommended by DGIF?

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