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Vogtle Electric Generating Plant
Units 1 and 2 License Renewal Application
Comments on Draft Generic Environmental Impact Statement
for License Renewal of Nuclear Plants, Supplement 34

Ladies and Gentlemen:

In May 2008, the NRC issued the draft Generic Environmental Impact Statement, Supplement 34 (SEIS) for the Vogtle Units 1 and 2 and requested comments be provided by July 16, 2008. Southern Nuclear Operating Company (SNC) has completed review of the draft SEIS and provides in the enclosures, a tabular list of comments, discrepancies and errata noted during the review. SNC recognizes that NRC developed the draft SEIS from review of the SNC Environmental Report (ER), as well as their own independent analysis of the relevant subject material. As such, SNC acknowledges that some of the discrepancies identified between the draft SEIS and the ER may be the result of use of sources other than the ER in their independent analysis and thus are not relevant.

In developing comments to the draft SEIS, SNC identified certain discrepancies between the NRC draft SEIS and information contained in the SNC ER, responses to NRC Environmental Site Audit Information Request, or Requests for Additional Information (RAIs). This information is identified in Enclosure 1 and where appropriate, includes additional information to clarify SNC comments. In addition, SNC provides in Enclosure 2 an errata list noted during the review for your consideration in the final SEIS. The staff is encouraged to contact SNC for additional clarification or explanation if necessary.

Please address questions or comments to D. L. Fulton at 205-992-7536 or T.C. Moorer at 205-992-5807.

SONSI Review Complete
Template = ADM-013

E-RIDS = ADM-03
Call = J.P. Leous (JPL1)
S. Hernandez (SH9)

U.S. Nuclear Regulatory Commission
NL-08-1038
Page 2 of 3

Mr. T. E. Tynan states he is a Vice President of Southern Nuclear Operating Company, is authorized to execute this oath on behalf of Southern Nuclear Operating Company and to the best of his knowledge and belief, the facts set forth in this letter are true.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY

T. E. Tynan

T. E. Tynan
Vice President - Vogtle

Sworn to and subscribed before me this 14 day of July,
2008

Kay D. Smith
Notary Public

Notary Public, Burke County, Georgia
My commission expires: November 11, 2011

TET/DLF/dmw

- Enclosures:
1. Comment Table for the Draft Generic Environmental Impact Statement, Supplement 34 for the VEGP Units 1 and 2 License Renewal Application
 2. Errata Table for the Draft Generic Environmental Impact Statement, Supplement 34 for the VEGP Units 1 and 2 License Renewal Application

cc: Southern Nuclear Operating Company
Mr. J. T. Gasser, Executive Vice President w/o Enclosures
Mr. T. E. Tynan, Vice President – Vogtle w/o Enclosures
Mr. D. H. Jones, Vice President – Engineering w/o Enclosures
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Document Services RTYPE: CVC7000 (letter, Enclosures 1 & 2)

Nuclear Regulatory Commission

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State of Georgia

Mr. N. Holcomb, Commissioner – w/o Enclosures
Dept. of Natural Resources w/o Enclosures

Tetra Tech NUS, Inc.

Ms. K. K. Patterson, Project Manager w/o Enclosures

**Vogtle Electric Generating Plant
Units 1 and 2 License Renewal Application**

Enclosure 1

**Comment Table for the Draft Generic Environmental Impact
Statement, Supplement 34**

Enclosure 1
Comment Table For The Draft Generic Environmental Impact Statement, Supplement 34
VEGP Units 1 and 2
License Renewal Application

Draft SEIS Section No.	Draft SEIS Section Title	Page	Line	SNC Comment
1.3	The Proposed Federal Action	1-7	37-40	Beginning with the sentence "VEGP has a cooling tower-based heat dissipation system" and continuing to the end of the paragraph, the text should be deleted as irrelevant to the purpose of the section, which is to identify the federal action. NRC does not license cooling towers. As an alternative option, the text should be revised to indicate that natural draft cooling tower make-up water for the circulating system comes from the river, mechanical draft cooling tower make-up for the auxiliary systems comes from groundwater, and that blowdown from both systems goes to the river. Section 3.1.2 accurately describes the systems.
2.0	Description of Nuclear Power Plant and Site and Plant Interaction with the Environment	2-1	7-10	The text should be revised consistent with comment on Section 1.3
2.1	Facility and Site Description and Proposed Plant Operation During the Renewal Term	2-4	5	The draft SEIS describes the SRS intakes as "inactive". While it is true that SRS no longer has operating nuclear reactors, and therefore, surface water requirements are greatly reduced from historic volumes, the SRS still withdraws approximately 40,000 gallons per minute (gpm) of Savannah River water (see page 2.12-6 of the ER for a brief discussion of reduced water withdrawal, and email from Bill Payne, WSRC Environmental Services Section).
2.1.4.3	Gaseous Waste Processing Systems and effluent Controls	2-13	40	The SEIS states that South Carolina "may" limit access to the EnergySolutions waste disposal facility in Barnwell, S.C. In fact, EnergySolutions was <u>not</u> successful in its petition to the South Carolina Legislature to keep Barnwell open to wastes other than those from the Atlantic Compact. The LLW disposal facility will no longer accept wastes from states that are not part of the Atlantic Compact.

Enclosure 1
Comment Table For The Draft Generic Environmental Impact Statement, Supplement 34
VEGP Units 1 and 2
License Renewal Application

Draft SEIS Section No.	Draft SEIS Section Title	Page	Line	SNC Comment
2.1.7	Power Transmission System	2-16	4	The draft SEIS states that the transmission lines are owned, operated and maintained by SNC. The lines are owned, operated and maintained by GPC and Georgia Transmission Company. See page 4.12-3 of the ER. SNC has responsibility only for the power plant.
2.1.7	Power Transmission System	2-17	16	Same comment as above.
2.1.7	Power Transmission System	2-18	4	Same comment as above.
2.2.1	Land Use	2-19	5-13	SNC determined, after submittal of the environmental report, that CZMA certification to the State of Georgia is not required. The program document for the Georgia Coastal Management Program identifies state requirements for consistency of federal activities, such as licensing, with the program. ¹ The document indicates that if a federal activity is likely to affect coastal uses or resources, then consistency applies. ² VEGP is not located in the Georgia coastal zone and, due to its distance from the coastal zone, is not likely to affect coastal uses or resources. The VEGP-McIntosh transmission line does extend into a county (Effingham) that is located within the Georgia coastal zone but continued operation of the line will not change and is not likely to affect coastal uses or resources.
2.2.4	Meteorology and Air Quality	2-35 to 2-36	40 - 2	This statement regarding the closest Class I area is inconsistent with the information presented in Table 8-3, page 8-18.

¹ State of Georgia Coastal Management Program and Program Document, National Oceanographic and Atmospheric Administration Office of Ocean and Coastal Resources Management and Georgia Department of Natural Resources Coastal Resources Division, June 2003. Available online at <http://crd.dnr.state.ga.us/assets/documents/GCMP.pdf>. Accessed June 4, 2008.

² Ibid., page 234.

Enclosure 1
Comment Table For The Draft Generic Environmental Impact Statement, Supplement 34
VEGP Units 1 and 2
License Renewal Application

Draft SEIS Section No.	Draft SEIS Section Title	Page	Line	SNC Comment
2.2.8.2.1	Water Supply	2-90	14-15	The groundwater supply information in the draft SEIS is not consistent with information provided in the SNC ER. As indicated in Section 2.3 of the ER the Tertiary and Water Table aquifers yield approximately 3 million gallons per day (mgd) and the Cretaceous aquifer yields approximately 5 billion gpd.
4.2	Transmission lines	4-17 to 4-18	39-2	As noted in comments on Section 2.1.7, Georgia Power, not SNC, maintains the rights-of-way.
4.8.3	Cumulative Impacts on Terrestrial resources	4-57	9-10	The SCE&G D-Area powerhouse (which is now operated by the DOE SRS contractor, and which is in the process of being retired) is within 6 miles of VEGP. See Figure 2-2.
4.8.5	Cumulative Socioeconomic Impacts	4-61	16-20	COL was submitted March 2008 and currently under review at the NRC.
8.1	No-Action Alternative	8-6	28-39	The statement that minority and low-income populations could experience a disproportionately high and adverse impact from plant shutdown is unsubstantiated. The statement should be replaced with a statement that there would be no disproportionately high and adverse impact or a supporting case should be developed that minority and low-income populations currently receive disproportionately high positive benefits that would then be lost upon shutdown.
8.2	Alternative Energy Sources	8-18	1	Table 8-3, page 8-18 is inconsistent with the information presented in Section 2.2.4.

**Vogle Electric Generating Plant
Units 1 and 2 License Renewal Application**

Enclosure 2

**Errata Table for the Draft Generic Environmental
Impact Statement, Supplement 34**

Enclosure 2
Errata Table For The Draft Generic Environmental Impact Statement, Supplement 34
VEGP Units 1 and 2
License Renewal Application

Draft SEIS Section No.	Draft SEIS Section Title	Page	Line	Errata
2.1.4.1	Liquid Waste Processing Systems and effluent Controls	2-11	22-23	This sentence is incomplete. Need to add "were released" between "gases" and "from".
2.1.4.2	Gaseous Waste Processing Systems and effluent Controls	2-12	31	Add "the" between "in" & "form".
2.1.4.2	Gaseous Waste Processing Systems and effluent Controls	2-12	32	Change "Gaseous" to "gases" in this sentence.
2.1.4.2	Gaseous Waste Processing Systems and effluent Controls	2-12	32-23	Change VEPG to VEGP through out the section
2.1.4.2	Gaseous Waste Processing Systems and effluent Controls	2-13	2	Change VEPG to VEGP.
2.1.4.3	Gaseous Waste Processing Systems and effluent Controls	2-13	34-36	Change VEPG to VEGP.
2.1.4.3	Gaseous Waste Processing Systems and effluent Controls	2-13	40	Remove comma after June.
2.1.5.1	Nonradioactive Waste Streams	2-14	19	Remove "and" between "wastes," & "concrete".
2.1.5.1	Nonradioactive Waste Streams	2-14	33-40	Change VGEP to VEGP.
2.1.5.1	Nonradioactive Waste Streams	2-15	7	Change VGEP to VEGP.
2.1.5.2	Pollution Prevention and Waste Minimization	2-15	26-38	Change VGEP to VEGP.
2.2.3.1	Surface Water	2-27	10	Change "radionuclides" to radionuclides.
2.2.5.2	Beaverdam Creek	2-53	26	Add "the" between "of" and "area."
2.2.5.3	Water Bodies in Transmission Line ROWs	2-54	11, 20	Change "mile" to "miles."
2.2.5.4.1	Site Vicinity	2-59	25	Delete one the uses of "is."
2.2.6.2	Threatened and Endangered Terrestrial Species	2-70	33	Change "stork" to "storks."
2.2.6.2	Threatened and Endangered Terrestrial Species	2-70	34	Add "a" in between "is" and "potential."

Enclosure 2
Errata Table For The Draft Generic Environmental Impact Statement, Supplement 34
VEGP Units 1 and 2
License Renewal Application

Draft SEIS Section No.	Draft SEIS Section Title	Page	Line	Errata
2.2.6.2	Threatened and Endangered Terrestrial Species	2-71	14	Change "borrows" to "burrows."
2.2.7	Radiological Impacts	2-85	9-31	Change "VEPG" to "VEGP."
2.2.7	Radiological Impacts	2-86	14, 32	Change "VEPG" to "VEGP."
2.2.7	Radiological Impacts	2-87	28	Change "VEPG" to "VEGP."
2.2.8.5.1	Transient Population	2-97	5	Change VGEP to VEGP.
4.0	Environmental Impacts of Operation	4-1	32	Add "in" between "addressed" and "Chapter."
4.1.2	Microbiological Organisms (Public Health)	4-14	33, 40	Change VEPG to VEGP.
4.1.2	Microbiological Organisms (Public Health)	4-15	41	Change VEPG to VEGP.
4.1.2	Microbiological Organisms (Public Health)	4-16	6, 23	Change VEPG to VEGP.
4.1.2	Microbiological Organisms (Public Health)	4-17	15-24	Change VEPG to VEGP.
4.2.1	Electromagnetic Fields-Acute Effects	4-23	11	Change VEPG to VEGP.
4.8.1.1	Water Use Impacts	4-53	14	Change "ground water" to "groundwater."
4.8.4.1	Cumulative Thermophilic Microorganism Impacts	4-58	20-39	Change VEPG to VEGP.
4.8.4.1	Cumulative Thermophilic Microorganism Impacts	4-59	2	Change VEPG to VEGP.
8.1	No-Action Alternative	8-6	30	Change "when" to "if."
8.2.2	Coal Based IGCC Generation	8-30	29	Change "reject" to "release".
8.2.2	Coal Based IGCC Generation	8-35	35	Change "addition" to "additional."
8.2.3	Natural Gas-Fired Combined-Cycle generation	8-53	11	Add "visible" between "be" and "from."
8.2.5	Conservation	8-65	25-26	Take out one "that."

Enclosure 2
Errata Table For The Draft Generic Environmental Impact Statement, Supplement 34
VEGP Units 1 and 2
License Renewal Application

Draft SEIS Section No.	Draft SEIS Section Title	Page	Line	Errata
8.2.5	Conservation	8-66	25, 30	Change VEPG to VEGP.