

PMSTPCOL PEmails

From: Paul Kallan
Sent: Tuesday, February 26, 2008 4:54 PM
To: 'gtgibson@STPEGS.COM'
Cc: 'Daniel C Mussatti'; William Burton; Cristina Guerrero; Richard Emch; Harriet Nash; Barry Zalcman; Irene Yu
Subject: Socio economics audit results
Attachments: Socioeconomics Audit Results.doc

Hi Greg/Bill:

Attached is the socioeconomics addendum to the Preliminary Audit Results table that was provided to STP at the close of the site audit on 02/07/08. The list includes questions/issues:

- * that were included in the original list of information needs provided to the applicant prior to the audit;
- * new issues that were discussed with the applicant during the audit, though they did not appear on the information needs list;
- * questions that were not discussed with the applicant at the audit due to time constraints; and
- * issues that arose through offsite interviews.

The resolution categories are the same as those in the table provided to the applicant at the close of the audit and should be interpreted in the same manner.

If you have any questions, please call me at 301-415-2809.

Sincerely,

Paul

Hearing Identifier: SouthTexas34Public_EX
Email Number: 1091

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Subject: Socio economics audit results
Sent Date: 2/26/2008 4:54:10 PM
Received Date: 2/26/2008 4:54:10 PM
From: Paul Kallan

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Socioeconomics Audit Results.doc		145984

Options

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STP Site Audit Results – Socioeconomics addendum

Socioeconomics/EJ – Mike Scott				
44	Sec. 2.5.1: Demographic Characteristics of the 0-km to 80-km (0-mi to 50-mi) Enclosed Population. This should include specific reporting of population characteristics and projections for the emergency planning zone defined as the area within a 16-km (10-mi) radius of the facility. Demographic characteristics and projections should also be shown for the "low-population zone" or "exclusion area" populations. Demographic characteristics should include age and sex distribution, transient or migrant population, racial and ethnic background, and income distribution (from the ER, latest decennial Census, other local/regional demographic sources such as planning commissions). These items were reported at the county level in the ER. Can these data be shown for the emergency planning zone in particular? Question withdrawn based on discussion with applicant contractor	X		
45	Sec. 2.5.2: Social-structure information, including major community structures. Most community structure information appears to be omitted. No organizations were identified. In considering this, think about how social service organizations, and membership and volunteer organizations, would be affected, by a population increase or an influx of the construction workforce, for example? How would it be different for the operations phase?		X	
46	Sec. 2.5.2: Public and private recreational facilities and opportunities, including present and projected capacity and percentage of use. There is no information about projected future use. Is there a possibility that any kind of water used by the plant or the plant-related population will affect either water quantity or water quality for any recreation purposes? We need to know the basis for any conclusions regarding this matter. This is also needed at the alternative sites. It appears from the Chapter 9 discussion, for example, that because cooling reservoirs appear to be small, water temperatures could rise significantly and/or evaporative loss could be a significant issue.	X		
47	Sec. 2.5.2: Local plans concerning land use and zoning that are relevant to population growth, housing, and changes in land-use patterns. We understand that the counties do not have land use plans. Are there any other methods used to control the location of housing and business, such as constraints on water hookups? We will need to obtain copies of the cities' land use plans.		X	
48	Sec. 2.5.2: Information on highways and transportation systems, for example: <ul style="list-style-type: none"> - regional and local highway systems, including carrying capacity and condition of roads and highways - availability and type of public transportation - modifications that might affect traffic flow to and from the station site. Capacity information may not be complete. We need to identify potential choke points in the transportation net and any plans to relieve those choke points		X	

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49	Sec. 2.5.2: Information about distinctive communities, including the characteristics of the State, Native American tribes, and the local region that may identify them as distinctive communities (e.g., historic districts, tourist attractions, cultural resources, and visual resources). None are mentioned. It is not clear whether this is because there are none, or because they have been omitted. What distinctive (e.g., minority, ethnic, religious) communities exist in the area of the plant? What about at the alternative sites?		X	
50	Sec. 2.5.4: Comments of any organizations contacted by the applicant that locate and assess uniquely vulnerable minority and low-income communities located on or near the proposed station site. It will be necessary to obtain details on the contacts and their comments, if any. How extensive of an outreach has there been to minority communities? We need documentation of any outreach attempted at the proposed site and at the alternative sites There may be a problem with disclosure of comments by individuals who are not public figures.		X	
51	Sec. 2.5.4: More specific description of any unique minority or low-income communities within each environmental-impact area that is likely to be disproportionately affected by the proposed project construction or operation. The description is very short and no impacts were noted. Are there more details on the thoroughness of the search? Applicant was asked to describe the outreach activity and who was contacted.		x	
52	Sec. 4.4.1: Applicable standards for levels of noise, dust, and gaseous pollutants. These seem to be only partially reported. Were all standards reported or were the ones reported just examples? The ones reported were intended as examples.	x		
53	Sec. 4.4.3: Pathways where any environmental (including socioeconomic) impact during construction may interact with cultural or economic facts that may result in disproportionate environmental impacts on minority and low-income populations. None in the natural system were found to be adverse, but only a summary of agency comments was reported. No information was supplied on potential pre-existing health conditions among minority and low-income communities, although the Texas Department of Health keeps fairly extensive local statistics on the health status of the population. Not clear how thorough the search was of other sources in minority community and literature. However, impacts on housing costs were noted. Applicant will look for, and report, pre-existing health conditions.		X	
54	Sec. 5.8.1: Applicant's proposed methods to reduce visual impacts and impacts of noise and other pollutants. These were discussed, but not committed to. Are there specific plans? What about at the alternative sites? At least one of the alternative sites appears to have residential development along the shoreline of the reservoir that would be used as a water source. Applicant was asked to clarify whether options listed are commitments.		x	x

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55	Sec. 5.8.2: Expenditures within the region for materials and services during operation. The applicant may be able to say very little, but it would be helpful to have some idea of the general scale and type of local expenditures. Is it likely to be billions of dollars? Tens of millions? Only a few thousand?		x	
56	The applicant has assumed that the construction and operations labor forces will be geographically distributed in the same percentages as the labor force for Units 1 & 2. This is perhaps a reasonable assumption, but has there been any assessment of what would happen if significant numbers settled in Calhoun and Jackson Counties? These counties are both close by and have low populations. Applicant conducted a study of this topic and we will ask for a copy.			x
57	Was the Matagorda data on largest employers actually from a survey by the applicant? In Table 2.5-8, the website http://www.eda-bc.com/demographics/employment.asp seems to be the source of only the Brazoria data. In the text it appeared that: "County Narrative Profiles," Texas Workforce Commission (Undated. Available at http://www.texasindustryprofiles.com/apps/cnp/index_single.asp , accessed March 16, 2007) might have been the source. In checking the largest employers' data at that site, I was able to locate the largest manufacturers but not the largest employers. Has this website changed its reporting since June 2007? The sources are unique to each county. The applicant does not have sources for Jackson and Calhoun Counties.	X		
58	On road conditions, we could not locate the information on road quality purported to be in reference documents 2.5-14 and 2.5-15. Reference 2.5-15 was not accessible on 1-16-2008. Does it still exist? We would like to obtain a copy of reference 2.5-17.		X	
A	Provide an electronic copy of the Socioeconomics "Validation Package"			X
B	Section 2.5.1: 2000 Census data can now be supplemented with later information from Texas demographic sources and the American Community Survey. Does this change any of the forecasts of population distribution or growth rates?			X
C	Section 2.5.1 and Section 2.5.2.1. Transient and part-time employment. There appear to be very few migrant farm workers. Are there significant numbers of seasonal workers in the local fishing industry? If so, how are they accounted for?			x
D	Section 5.8.2.2.2. Please base tax revenue yields on current ownership percentages. Using whatever reasonable assumptions are necessary, please provide quantitative estimates of tax yields during operations.			x
E	Section 5.8.2.2.4. As with section 4.4.2.2.4, please reconcile trip data for plant workers, outage workers, and general public, focusing on peak hour usage of FM 521 in particular.			x
F	Section 5.8.2.2.6. As with the corresponding subsection in Section 4.4, please use latest housing figures (post-2000 Census), or explain that the 2000 Census data are the latest available.			x

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G	Section 2.5.2.5. What is the projected use of recreational facilities? Are there any universities that conduct studies of parks along the Colorado river? Are there any professional outriggers such as kayak tours on the river		x	
H	Section 4.4.2.1. The construction wages for skilled nuclear construction workers are likely to be significantly higher than the existing average annual construction wage in Matagorda County. Please revise impacts using more realistic rates and cite sources.		x	
I	Section 4.4.2.2.1. "However, after construction completion, a total of 50% of the movers would be expected to migrate back out of the 50-mile region." At the end of the construction period, the entire income source of plant construction jobs goes away. This, rather than the specific workers, is the source of secondary impacts. Please revise the post-construction impact to reflect the loss of the jobs rather than the loss of the workers.			x
J	Section 4.4.2.2.3. It is not clear why 50% of the land converted for construction workers would return to its original use and 50% would remain converted. Please explain.			x
K	Section 4.4.2.2.4. "For purposes of analysis, it was assumed that 100% of the 4073 vehicles were attributable to the current STP labor force." This seems like an overestimate, since the plant workforce is about 1365. If they all arrived and left once a day and all drove alone, this would total about 2730. Please consider outage workers, contractors, and non-plant-related traffic in your estimate.		x	
L	Section 4.4.2.2.4. The esal-based estimate of traffic from plant construction is relevant to pavement cracking and deterioration, but not to congestion. How does the shift-change traffic relate to peak-hour vehicle capacity?			x
M	Section 4.4.2.2.4. What would be the quantitative impact of plant workforce during construction on traffic on hurricane evacuation routes Highways 60, 35, 36, 71, FM 1095, and 288?			x
N	Section 4.4.2.2.4. If the rebuilt railroad spur would cross FM 521 on a grade crossing, what would be the impact on traffic flow on FM 521 and what actions would be taken to avoid impact.			x
O	Section 4.4.2.2.6. The quantitative analysis appears to assume that the in-moving construction workforce would occupy permanent housing. Please discuss the likelihood of mobile homes as a housing choice, in view of the heavy reliance of these during construction of units 1 and 2.			x
P	Section 4.4.2.2.7. The social services section does not discuss impacts on programs such as Child and Family Services, Food Stamps, alcohol and drug abuse programs, and other social service programs and non-governmental charities. Please discuss.			x

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Q	Section 4.4.2.2.8. Are the discussions in this section sensitive to the potential grade levels of the projected in-migrating students? If so, what are the sensitivities? What are the likely impacts on ISD costs and revenues?			X
R	Section 3.10S, based on Sections 4.4 and 5.4: It would be helpful to add a month by month table of projected “workers on site,” to include existing operating workforce, outage workers, construction workforce for units 3 and 4, operating workforce for units 3 and 4. The table should include an operating period with Units 2-4 all operational, with and without an outage workforce.			X
S	Please reconcile the assumption in Section 4.4.2 that 50% of construction workers will live within the 50-mile commuting distance with the assumptions in Section 3.10S that less than 10% of the field craft labor and none of the non-field craft labor would come from within 50 miles. Also reconcile with the Section 3.10s statement that “Seventy to eighty percent of the construction workforce will be employed for more than four years. Most of the craft labor from outside the 50-mile radius will seek temporary housing, and most of the non-manual staff will relocate to the area and seek permanent housing.”			X
T	Since the operations and construction workforces overlap, what is the cumulative impact on housing, services, etc. during the late construction phase			X
U	Section 2.5.6. Latest housing data shown are from the 2000 Census. Please confirm whether these are the most recent data available. If more recent data are available (for example, price and vacancy data) please use them to supplement the data currently shown.		X	
V	Section 2.5.2.7.4. What are the major non-governmental social services organizations, and what do they do?		X	
W	Section 2.5.2.8. Several of the local school districts have very high participation in the federal school lunch program. For each ISD, how important is this program to ISD finances?		X	
X	Section 2.5.2.8. What is the importance of the “rollback election” mechanism on ISD M&O funds?			X
Y	Section 2.5.2.8. We understand that NRG is paying Moak, Casey, and Associates of Austin, TX for a study of the economic impact of STP 3 and 4 on school finances. Please provide a copy of the study.			X
Z	Section 2.5.2.8. The current ownership of STP 1 & 2 has changed over time, with San Antonio, the non-taxable entity, taking a larger share of the STP 1 & 2 plants. What is the past effect and likely future effect of this trend for local government and ISD revenues?			X
AA	Section 2.5.7.1.1. “Steam-electric water demand will increase by 45%, from 153,522 acre-feet to 222,058 acre-feet in the same time period.” What projects account for the increase?			X

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BB	Why was the center of the 50-mi circle the midpoint between Units 2 and 3? Because they wanted to deal with the cumulative impact for all four units on the safety side.	X		
CC	How did you forecast population from 2040 to 2080? Rate of growth at county level was projected forward, then allocated using SECPOP model.	X		
DD	Ref 2.5-8n does not contain data on individual municipality populations. I do not understand the choice of cities. This was a sample of cities > 1,000 in population	X		
EE	Are you "off" one reference? Table 2.5-9 seems to have as its source Reference 2.5-11 not 2.5-12		X	
FF	According to the ER, "Table 2.5-14 shows the total property taxes collected by the county, the total property taxes STPNOC has paid to Matagorda County, and the percent of the total county property taxes that are paid by STPNOC." However, the actual table only appears to show a breakdown of STP owner payments, not a comparison with total property taxation. Is there a table missing? Applicant to provide missing table and/or re-work text to match table.		X	
GG	How is a Texas farm-to-market road different than a county road? What is the significance of the weight-bearing capability of 58,000 pounds in a 24-hr period? What are "esals" and what is their significance? Applicant will clarify relationship of Texas DOT measurements to road traffic capacity and traffic counts to likely traffic during construction and operation.		x	
HH	Are we correct in assuming that the traffic count data in ER table does not reflect outage conditions at STP 1&2 and that the 1500 to 2000 outage workers would increase AADTs on FM 521 by 700-800?	x		
II	What are the likely commuting routes to STP from Calhoun and Jackson Counties?	X		
JJ	Provide a copy of the reference 2.5-17 "Yoakum District Highway Traffic Map," TXDOT, 2005. Transportation Planning and Programming Division.			X
KK	Are any upgrades planned for the transportation system in Matagorda County? We have become aware of some plans in the Bay City area; applicant will provide a discussion.		x	
LL	Is upgrading the 9-mile rail spur into the STP site a commitment of the STPNOC?		x	
MM	Are there seasonal deliverability/low water issues in using the STP barge slip? How will they be overcome?		x	
NN	What does it mean to have maximum water treated exceed rated capacity of the system (happens in a few instances in Table 2.5-30)? Applicant will provide explanation.		x	
OO	Are the population forecasts in the TX Water Plan consistent with those in our demographic section? It looks like maybe not. Region K grows by 92% from 2000 to 2040; Matagorda by 28%. Brazoria is OK. It grows at the predicted rate for region H through 2040. Applicant will investigate and link the two discussions.		X	
PP	List private schools within 50 miles of STP. Applicant will provide names, locations, and enrollment.		X	

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QQ	<p>Employment numbers in these two places are not consistent: The major employment facilities in the area, in addition to STP, include OXEA Corporation and Equistar Chemicals, LP. OXEA Corporation is located approximately five miles north-northeast of the plant and employs a total of 155 persons. Equistar, located about seven miles east of the STP site, employs 194 workers (STPNOC 2007b {FSAR Section 2.1S.3.3.1}.</p> <p>he plant produces industrial chemicals and employs approximately 250 workers. The second employer is Lyondell Chemical (Equistar), located approximately seven miles east of the STP site, which produces polyethylene chemicals, and also employs approximately 250 workers.” (ER Section 2.5.2.1.</p> <p>Reconcile numbers.</p>		X	
RR	<p>Are data available on revenues and expenditures in the city of Palacios, similar to the data provided for Bay City?</p>		x	
SS	<p>Section 4.4.1.1.1. The text notes: “As presented in Subsection 3.9S.2.1, procedures related to mitigating noise and vibration impacts from construction activities may include measures such as restricting noise and vibration generating activities to daylight hours, prohibiting construction traffic from driving on specific roads and through specific neighborhoods, use of less vibration producing equipment and/or methods (e.g., dampeners, staggering activities), and verifying that noise control equipment on vehicles and equipment is in proper working order. Notifications to regulatory agencies (e.g., Texas Commission on Environmental Quality [TCEQ]) and nearby residents regarding atypical noise and vibration events (e.g., pile driving, steam/air blows) may also be performed.” These actions seem to be noted as generic options. Are any of these be commitments?</p>			x
TT	<p>Section 4.4.1.1.3 “Public roads may be altered (e.g., widened, turn lanes installed) as a result of construction activities.” Is this a commitment? If not, what circumstances would turn it into one?</p>			x
UU	<p>Section 4.4.1.2. “The following controls or similar ones could be incorporated into activity planning to further minimize noise and associated impacts:</p> <ul style="list-style-type: none"> • Regularly inspecting and maintaining equipment to include noise aspects (e.g., mufflers) • Restricting noise-related activities (e.g., pile-driving) to daylight hours • Restricting delivery times to daylight hours” <p>Are any of these actions commitments?</p>			x

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VV	Section 4.4.2.2.1. Provide a copy of "RIMS II Multipliers for Matagorda and Brazoria Counties, Texas," BEA (U.S. Bureau of Economic Analysis), U. S. Department of Commerce. Economic and Statistics Administration. Bureau of Economic Analysis, Washington, D.C. February 2, 2007			x
WW	Section 8.0 (and elsewhere in the document). Clarification of ownership throughout chapter has various names for the same owners, e.g.. CPS, City of San Antonio, CPS-Energy. Clarify NRG LP 3 & 4 are separate entities owned by NRG Energy. Verify these titles throughout other chapters		x	
XX	Section 8.4. Long-term assessment CDR (capacity demand and reserve) Load responses and forecasts beyond 10 years look towards 2018-2020 time frame		x	
YY	Section 8.4. Need contact people for ERCOT studies and forecasts.		x	
ZZ	Section 9.3 Need more socioeconomic information on the alternative sites. Some specifics follow		x	
AAA	Section 9.3.3.1.6, "Impacts to socioeconomic issues at the [Limestone, Allen's Creek, site will be SMALL, with potential MODERATE beneficial impacts. These impacts are somewhat less than those at the proposed site." Detailed impacts were described in this section as generally similar to impacts at the STP site, some of which (e.g. traffic impacts on roads, housing) were described as MODERATE to LARGE at the STP site. Reconcile these two apparently contradictory statements.		x	
BBB	Section 9.3.3.2.6 "Impacts to socioeconomic issues at the Allen's Creek site will be SMALL, with potential MODERATE beneficial impacts, and MODERATE effects in Austin County, where the influx of workers could strain services. These impacts are similar or greater than those impacts predicted for the proposed site. Detailed impacts were described in this section as generally similar to impacts at the STP site, some of which (e.g. traffic impacts on roads, housing) were described as MODERATE to LARGE at the STP site. Reconcile these two apparently contradictory statements.		x	
CCC	Section 9.3.3.3.6. "It is expected that socioeconomic impacts would be SMALL to MODERATE, similar to those at the proposed STP site, since an influx of construction workers could temporarily adversely affect resources in Henderson County. However, MODERATE beneficial impacts may also occur as a result of increased taxes and jobs in the county." Detailed impacts were described in this section as generally similar to impacts at the STP site, some of which (e.g. traffic impacts on roads, housing) were described as MODERATE to LARGE at the STP site. Reconcile these two apparently contradictory statements.		x	