

June 29, 2009

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United States Regulatory Commission
Mail Stop – T6-D32
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Dear Mr. Masnik:

Florida Power and Light Company's plan to erect two more nuclear generators at Turkey Point on the shore of Biscayne National Park raises a number of concerns for me as I am sure it does for many others.

The generators will require 90 million gallons of cooling water per day. To date it seems two proposals have been advanced.

One proposal would bring that water from a planned sewage treatment facility on Virginia Key, more than twenty miles from Turkey Point. To deliver the water would require a large pipe from the treatment plant across Virginia Key, across the northern part of the bay to meet the mainland far enough south to avoid the densely populated areas of Coconut Grove, Coral Gables, South Miami and beyond. This would require burying the pipe under miles of Biscayne National Park's shallow waters with the resultant turbidity and probably significant damage to the biota of the bay. Once the pipe reached the mainland it has been proposed to be laid in north-south canals through the fragile and vital wetlands to Turkey Point. It is anyone's estimate the amount of damage to those wetlands that will occur as monstrous machinery tramples the area laying the pipe. Scary indeed! How much inshore silting will it generate?

Another proposal would bury a large grid of pipes under Card Sound waters and some of these appear to be under Park water as well. The Park has a slow, weak northbound inshore current and the silting that would result from that operation could smother a great deal of Park bay bottom.

There could be as much as 65 million gallons of heated water from the reactors to dispose of each day. Obviously, it can't be dumped in the Park waters. Could it be pumped to an acceptable ocean depth? Would shoreline cities such as Key Biscayne and Miami Beach tolerate that? Could it be pumped into the so-called "boulder zone" of the salty Floridan aquifer without harm? If so, then it would seem problematical that the proposal to bury intake pipes in the same aquifer would conflict. We are already learning the unpleasant consequences of pumping sewage treatment effluent into that aquifer. It doesn't necessarily stay there.

The FPL plan also includes a very large mound of rock fill for the new generators and auxiliary equipment. It is proposed to be 20 to 24 feet high and require as much as ten million cubic yards of material. The bulk of the material will be taken from a 300 acre lake to be dug on FPL property only one mile from Park waters. Experience with deep rock pits in the so-called "lake belt" in northwest Miami-Dade has shown significant potential to contaminate the county's northwest well-field. The FPL "lake" will have the same possibility to cause harm as it attracts the dumping of many things in that remote area.

It has been suggested that the "lake" will act as "storage" for the Park. The logic of that is quite difficult to fathom. The Biscayne Aquifer has been slowly flowing and filtering through the porous Miami oolite rock for many thousands of years on its way to the bay. Is it suggested that somehow the water in the "lake" will stay there waiting for the day the Park needs it? The water will continue to filter in a northwest to southeast direction as it has always done. But now it may have significant contaminants. Also there won't be as much water for the Park because hundreds of thousands of gallons will evaporate from the rock pit surface. The Federal government, the South Florida Water Management District and Miami-Dade County are all trying to deliver MORE water to the Park.

Obviously the proposed height of the mound suggests FPL is planning for sea level rise – but 24 feet? The mound may require as much as ten million cubic yards of rock. This would require FPL to dump one twenty cubic yard truck every three minutes for three and one-half years. All roads and bridges to Turkey Point will need to be rebuilt before the trucking operation begins. What will that amount of truck traffic do to visitors to the Park using the same road? Will it destroy the experience? The area surrounding Turkey Point will be submerged before 2010 and the facility will be an island.

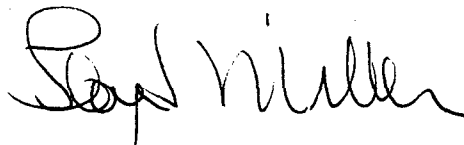
FPL has asked the County Commission for permission to store more nuclear wastes because there isn't any place that will accept it. There will now be four nuclear units producing twice as much nuclear waste. What will happen as the sea level rises and there isn't a central depository where FPL can ship the waste?

Has sufficient consideration been given to locating the new units elsewhere in Florida? There has been discussion about the difficulty of locating new corridors for power lines. True enough, and existing transmission lines from Turkey Point argue for locating the new units there. However, they will require more lines in new corridors for the two new units. If locating power line corridors is difficult now, imagine the enormous problems that will present themselves when the sea level rise pushes millions of residents and thousands of hotels and businesses back from the shore line, concentrating them. Additionally, there may be fifty percent more residents at that time. It almost seems axiomatic that prudent really long range planning would indicate a proposal other than that offered. Present FPL customers will be required to contribute billions of dollars to this construction. Is there not some logic to a really long range plan and bite the bullet now rather than sink the billions and the risks into the present proposal and redo the entire thing in, who knows, how many years?

What the bay, Park and community are now facing is uncomfortably similar to the scenario in 1968 when FPL put the first oil-fired generator on line using water from the bay and returning the heated water to the bay. In a short time 300 acres of bay bottom were "dead" and sponges were gone more than 2000 feet from the outfall. Interior Secretary Stuart Udall went to Federal court and FPL was required to construct a closed circuit cooling canal system still in use today.

It is totally unthinkable that a similar system be used for the new units? Of course there would be great environmental damage. So too will there be great environmental damage from a large 22 mile long pipe with pumping stations dug through the wetlands and the pipe buried in Park waters. There will be great environmental damage from the proposed 300 acre rock pit one mile from Park waters. There is also a distinct possibility of damage to the Park from burying a grid of large pipes in bay bottom and great potential damage from the effort to dispose of 65 millions of hot water each day. A closed circuit canals system involves none of this. Also, there is the money. A closed-circuit canal system would cost peanuts compared to the hundreds of millions that will be spent on any of the alternatives. Would the sum of damage from other proposals equal or exceed the damage from cooling canals? Shouldn't that also be a consideration?

Respectfully,



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WILL THIS BE THE END OF
BISCAYNE NATIONAL PARK?