PMNorthAnna3COLPEmails Resource

From: Harvey, Brad
Sent: Wednesday, October 07, 2009 9:40 AM
To: Berkowitz, Carl M
Cc: NorthAnna3COL Resource
Subject: RE: Location of North Anna final SEIS w/markups on EARRTH

Carl:

I have a couple of suggestions regarding the air quality write-up which I've indicated below.

Please let me know if you have any questions.

Thanks.

Brad
301-415-4118

From: Berkowitz, Carl M [mailto:Carl.Berkowitz@pnl.gov]
Sent: Tuesday, October 06, 2009 7:47 PM
To: Harvey, Brad
Subject: RE: Location of North Anna final SEIS w/markups on EARRTH

Hi Brad,
I finally got a break from V.C. Summer and wanted to touch base regarding your suggestions for North Anna. As you'll see, I agree with most of the suggestions; they all result in a more clearly written document.

For the ozone attainment issue… I wrestled with this one and came up with the material below, which I hope clarifies changes in ozone attainment in Virginia. It's derived from two primary references, both attached. While I think I have the story right, I'd be mighty appreciative of having someone else read the attached letter from VDEQ to EPA and look at the first page of Enclosure II (a map showing proposed nonattainment areas) to make sure the following material is defensible.

> *The county in which the ESP site is located, Louisa County, is within the Northeastern Virginia Intrastate Air Quality Control Region (AQCR). With the exception of Stafford ~~Frederick~~ County, the counties in this AQCR had previously been designated as "in attainment or unclassified" for all criteria pollutants for which National Ambient Air Quality Standards had been established (40 CFR 81.347). Attainment areas are areas where the ambient air quality levels are better than designated by the U.S. Environmental Protection Agency (EPA). Louisa County and Spotsylvania County (70 FR 76165) had been classified as in attainment of the ozone standard (40 CFR 81.347).*
>
> *The State of Virginia (VDEQ, 2008c) recently reviewed air quality information in order to make a recommendation to the U.S. Environmental Protection Agency (EPA) on what areas may not meet EPA's 8-hour standard. In a letter from VDEQ to the EPA |letter from D.K. Paylor, VDEQ, to W.T. Wisniewski, EPA, March 11, 2009|, the Commonwealth of Virginia recommends that ~~the Fredericksburg Nonattainment Area, which includes Caroline County,~~ Spotsylvania County, Stafford County, ~~and~~ the City of Fredericksburg, and parts of Caroline County be classified as the Fredericksburg nonattainment area|Enclosure II - letter from D.K. Paylor, VDEQ, to W.T. Wisniewski, EPA, March 11, 2009|~~, be the same as the nonattainment areas under the 1997 ozone standard, with the addition of a portion of Caroline County~~. Although neighboring Spotsylvania County would be a nonattainment area under this recommendation no change to the existing status of "in attainment or unclassified" was proposed for Louisa County. Although the final status of all regions in Virginia will not be*

determined by EPA until 2010, the staff sees no changes to the description of the NAPS site regional air quality at the present time.

Thanks,
Carl

From: Harvey, Brad [mailto:Brad.Harvey@nrc.gov]
Sent: Thursday, September 24, 2009 10:19 AM
To: Williamson, Alicia
Cc: Berkowitz, Carl M; Ramsdell, James V Jr (Van); Stoetzel, Gregory A; Sandusky, William F III; Emch, Richard; Samaddar, Sujit; Lauron, Carolyn; NorthAnna3COL Resource; Dehmel, Jean-Claude
Subject: FW: Location of North Anna final SEIS w/markups on EARRTH

Alicia:

I have (I hope) reviewed the correct version of the SEIS this time and have the following meteorology/air quality (as well as health physics) comments to offer on the final SEIS:

1. Section 2.3, page 1/lines 19-21, and Section 7.2, page 1/lines 5-7, both state Spotsylvania County is designated as being in nonattainment for the 8-hour ozone standard. This statement appears to conflict with Section 2.3.2 of ESP EIS (NUREG-1811, Dec 2006) and 40CFR81.347 (Revised as of July 1, 2008) which state Spotsylvania County is classified as in attainment of the ozone standard.

2. Suggest that the sentences in Section 2.3, page 1/lines 31-36, be reworded as follows (see FSAR Section 2.3.5.1, page 2-135, as a reference; also see 4th comment below):

   A review by Dominion of the location of the nearest receptors, conducted as part of the annual Radiological Environmental Monitoring Program review, showed that the closest receptor was now a resident located 1.36 km (4453 ft) ~~1.20 km (3930 feet)~~ NW of the plant facility boundary. As a result, Dominion made the conservative assumption that one of each type of receptor ~~all sensitive receptors~~ (residence, vegetable garden, and meat animal) was assumed to be at 1.20 km (3930 ft) in each compass direction ~~were at this distance~~ and reanalyzed χ/Q and D/Q calculations with this assumption.

[Berkowitz, Carl M] *The above suggestions enhance clarity; I agree and made these changes to the FEIS.*

3. Should Section 5.2 be expanded to say that the Unit 3 cooling tower plume and deposition impacts are bounded by what was presented in the ESP EIS?

[Berkowitz, Carl M] *The above suggestions enhance clarity; I agree and made these changes to the FEIS.*

4. Suggest that the sentences in Section 5.9, page 1/line 34, page 2/lines 1-2, and page 3/lines 2-3 be reworded as follows:

   The distances to the MEI were based on the distances from the ~~The release point was the~~ plant facility boundary which was a circular area that encompassed the three stacks (see Figure 5-1). Dominion conservatively assumed that each receptor type (i.e., nearest resident, nearest meat animal, and nearest vegetable garden) was at ~~the location of the closest receptor. The closest receptor was the nearest residence located~~ 1.20 km (0.74 mi) in each compass direction ~~northwest of the proposed Unit 3~~ (Dominion 2008d).

[Berkowitz, Carl M] The *above suggestions enhance clarity; I agree and made these changes to the FEIS.*

5. Suggest that the sentence in Section 5.9, page 8/lines 3-5 be reworded as follows:

Gaseous pathway doses to the MEIs were calculated for the proposed Unit 3 by Dominion using the GASPAR II computer program (Strenge et al. 1987) at the nearest site boundary and the bounding ~~nearest~~ receptor location.

***[Berkowitz, Carl M] The** above suggestions enhance clarity; I agree and made these changes to the FEIS.*

Please let me know if you have any questions.

Brad
415-4118

From: Williamson, Alicia
Sent: Thursday, September 24, 2009 8:40 AM
To: Cook, Christopher; Cook, John; Dehmel, Jean-Claude; Dozier, Tamsen; Emch, Richard; Fuller, Edward; Garcia-Santos, Norma; Harvey, Brad; Hinson, Charles; Kugler, Andrew; Lee, Jay; Masnik, Michael; McBride, Mark; Mussatti, Daniel
Cc: Sandusky, William F III; Carpentier, Marcia; Weisman, Robert; See, Kenneth
Subject: Location of North Anna final SEIS w/markups on EARRTH

As I indicated a few days ago, the North Anna final SEIS is available on EARRTH. Feel free to talk with your PNNL counterpart about what type of changes were made and what if any additional changes you would like to see. Also, you can find the document at the following location: Site Documents/COL Sites/North Anna/18 FEIS Writing Meeting/**01 Pre-Writing_Meeting _Drafts**/**Document by Section**. Please be sure to look only at these folders.
Thanx
Alicia

Alicia Williamson
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Hearing Identifier: NorthAnna3_Public_EX
Email Number: 815

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Sent Date: 10/7/2009 9:39:32 AM
Received Date: 10/7/2009 9:39:33 AM
From: Harvey, Brad

Created By: Brad.Harvey@nrc.gov

Recipients:
"NorthAnna3COL Resource" <NorthAnna3COL.Resource@nrc.gov>
Tracking Status: None
"Berkowitz, Carl M" <Carl.Berkowitz@pnl.gov>
Tracking Status: None

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Options
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Reply Requested: No
Sensitivity: Normal
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