

PMLevyCOLPEm Resource

From: Bruner, Douglas
Sent: Wednesday, October 28, 2009 9:21 AM
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Subject: Teleconference Summary 102209-Levy-Final
Attachments: Teleconference Summary 102209 - Levy - Final.doc

All,

Attached is the summary for the October 22, 2009 teleconference for Levy. Please call me if you have questions.

Thanks,

Doug

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**Teleconference Summary
Levy COLA
October 22, 2009**

Discussion Topic

Introductions

PEF's Approach to RAIs on Alternatives

On a teleconference held October 15, 2009, Progress Energy Florida (PEF) provided the U.S. Nuclear Regulatory Commission (NRC) and the U.S. Army Corps of Engineers (USACE) with an initial overview of how they plan to approach each NRC Request for Additional Information (RAI) on alternatives (ML092650208). A summary of PEF's approach is provided below. In addition, NRC and USACE developed additional clarifying questions to be discussed during the October 22, 2009 teleconference. Such questions are referred to as "Additional Clarifying Questions", which are provided below.

RAI Summary of PEF's Approach and Clarifying Questions

9.3-2 Summary: No digitized wetland data were used. Wetlands were used as a screening tool, but it was not considered an exclusionary criterion for the Region of Interest. PEF will clarify how wetlands were considered in the Evaluation of Florida Sites (EFS) and discuss revisions to the Environmental Report (ER) in their response.

9.3-3 Summary: Analyses were based on 6,000-ac circles, which will be clarified in the response. Updated maps of all sites will be provided in a revised alternatives analysis to support the Least Environmentally Damaging Practicable Alternative (LEDPA) decision. Note that maps are needed for NEPA documents as well.

Additional Clarifying Question: At the alternatives site audit, PEF said that sites as small as 2,000 acres were considered. At what point in the site selection process did PEF only consider 6,000 acre sites?

PEF would have considered sites as small as 2,000 acres but no sites were limited by the 2,000-acre constraint.

9.3-4 Summary: Wetland ratings were based on the percentage of area covered by wetlands.

9.3-5 Summary: The National Wetlands Inventory (NWI) mapper was used to account for wetlands. The NWI mapper was available for all 20 potential sites.

Additional Clarifying Question: The EFS indicates that riverine wetlands were not included in wetland estimates (page 107). Provide clarification for this statement.

Open water and portions of flowing rivers were excluded from wetland estimates. The reanalysis, as described in 9.3-6, will be conducted in the same manner and the methods will be clarified in the supplement to the EFS and the ER.

9.3-6 Summary: The EFS and ER will be revised with updated wetlands estimates. There was a defect in the NWI mapper that was used to estimate wetland coverage in the EFS. Progress Energy learned about the defect in the program when responding to these RAIs.

New wetland numbers will be calculated for all sites. In addition, a supplement to the EFS and revisions to the ER will be provided which will reevaluate wetland coverage and wetland scores for all sites. If scores for the sites change based on the new wetland estimates, PEF will reevaluate all sites to determine new overall rankings for the sites.

- 9.3-7 Summary: PEF will provide a map that clearly shows the boundaries of Levy 2 site, as used in the EFS, and the boundaries of the proposed LNP site, as indicated in Chapters 3, 4, and 5 of the ER. The alternatives analysis to support the LEDPA will be based on the proposed LNP site.

If the boundary of the LNP site is not entirely contained within the Levy 2 site, PEF will reanalyze all site-specific environmental criteria for Levy as a supplement to the EFS and ER. In the supplement, PEF will examine a site that totally encompasses the current boundaries of the proposed LNP site. If any score for any environmental criteria is changed based on the revised location (such as floodplains), PEF will rescore the category and revise the site rankings as appropriate.

Additional Clarifying Question: Is the evaluation of the Levy alternative in Chapter 9 based on Levy 2 site or the proposed LNP site?

Section 9.3.3 is based on the LNP site, although other portions of 9.3 were based on the Levy 2 site. In the supplement to the EFS and the ER, all of 9.3 will be updated with the reanalysis of the Levy site, using a 6,000-acre site that encompassed the LNP site, as described above.

- 9.3-8 Summary: No further refinement was conducted.
- 9.3-9 Summary: PEF will provide additional clarification for each element used to score wetlands and provide updated wetland estimates and, if appropriate, site rankings, as discussed in the summary to RAI 9.3-6.
- 9.3-10 Summary: A definition of “high quality wetlands” will be provided. PEF will also provide clarification for how dewatering effects were accounted for. In addition, PEF will provide updated wetland estimates and, if appropriate, site rankings, as discussed in the summary to RAI 9.3-6.
- 9.3-11 Summary: No formal layouts for reservoirs were proposed. All reservoirs would be located within the 6,000-acre sites. More detailed information will be provided in the Alternatives Analysis to support the LEDPA. Preliminary siting of such reservoirs will be provided in the LEDPA document, which will address the potential impact to wetlands and other resources.
- 9.3-12 Summary: State species of concern were not considered in the EFS. State species of concern were considered in the ER (selection of the environmentally superior alternative) by looking at county level occurrence information. Additional details regarding state species of concern will be provided in the Alternatives Analysis to support the LEDPA decision.

Additional Clarifying Questions: What sources of data will be used to analyze state species of concern in the LEDPA document? Will revisions to Chapter 9 of the ER be provided?

PEF will be using additional sources of data in the LEDPA document, such as FNAI data. All sources of data will be described in the revised LEDPA document. PEF will be conducting analyses for the 6,000-acre sites, as well as more refined analyses in the general areas of impact (e.g. where the powerblock would be located).

- 9.3-13 Summary: State species of concern were not considered in the EFS. State species of concern were considered in the ER (selection of the environmentally superior alternative) by looking at county level occurrence information. Additional details regarding state species of concern will be provided in the alternatives analysis to support the LEDPA decision.

Additional Clarifying Questions: Clarify why FNAI data were not used. Will FNAI data be used in the LEDPA document?

PEF will be using additional sources of data in the LEDPA document, such as FNAI data. All sources of data will be described in the revised LEDPA document. PEF will be conducting analyses for the 6,000-acre sites, as well as more refined analyses in the general areas of impact (e.g. where the powerblock would be located).

- 9.3-14 Summary: PEF will define subcomponents of the criterion and clarify how the scoring was conducted.

Additional Clarifying Question: Provide additional clarification on how PEF plans to approach this RAI.

Habitat quality and flexibility will be defined and PEF will provide a basis for the scoring.

- 9.3-15 Summary: PEF will reanalyze the floodplain scores for LNP given that Levy 2, which was the site used in the EFS, was given a score that assumes floodplains could be avoided. After more detailed siting studies, LNP was sited in an area that would impact floodplains. PEF will examine whether other environmental categories would also be scored differently given the current location of LNP, as compared to the location of Levy 2 in the EFS. A supplement to the EFS and ER will be provided which analyzes all site-specific environmental categories for a 6,000-acre site that totally encompasses the proposed LNP site, as described above in the summary for 9.3-7.

- 9.3-16 Summary: Little information was added when going from the candidate sites to the alternative sites because additional research conducted for the alternative sites did not change the scoring for such sites.

Additional Clarifying Questions: Explain why more detailed data, such as FNAI data, were not used to further refine the alternative sites. Will more detailed data be provided for LEDPA document? Will sites be redefined to smaller parcels within the LEDPA document?

PEF will be evaluating 6,000-acre sites and subsets of 6,000 acres where impacts would likely occur, as described in the RAI 9.3-12 and 9.3-13. The analysis will include

FLUCCS data as well as other sources of site-specific data, which were not included in the original LEDPA document.

- 9.3-17 Summary: PEF conducted a “good faith attempt” to verify data gathered for the EFS using on-ground inspections. On-ground inspections were limited to public roads, which is why the underestimation of wetland numbers was not realized.

Additional Clarifying Question: Land owner agreements were obtained for borings. Explain why land owner agreements were not used to conduct more detailed on-ground inspections.

PEF will describe the process and timing with regard to access agreements for core borings and on-ground inspections. PEF will also provide additional clarification on the extent and methods of on-ground inspections.

- 9.3-18 Summary: A revision to the ER will be provided in order to clarify this issue.

- 9.3-19 Summary: Dixie was carried forward as a candidate site, and not initially screened out, because land availability was not examined until later in the site selection process.

- 9.3-20 Summary: Crystal River was carried forward as a candidate site, and not initially screened out, because susceptibility to extreme weather events was not examined until later in the site selection process.

Other

- A USACE, meeting with PEF to discuss pre-submittal responses to RAIs is being considered for the week of November 16-20, 2009. The NRC and USEPA will be invited to attend.
- Participants on Teleconference (October 22, 2009):

Bob Kitchen (PEC)	Doug Bruner (NRC)
Arun Kapur (PEC)	Michelle Moser (NRC)
Jim Nevill (PEC)	Andy Kugler (NRC)
Rick Zeroko (CH2M Hill)	Barry Zalcman (NRC)
Jamie Hunter (CH2M Hill)	Peyton Doub (NRC)
Bill Marsh (CH2M Hill)	Michael Smith (PNNL)
Scott Freeman (CH2M Hill)	Linda Fassbender (PNNL)
Lorin Young (CH2M Hill)	Rajiv Prasad (PNNL)
Charlie Uhlarik (CH2M Hill)	Bill Baber (ISL/ICF)
Kyle Turner (McCallum-Turner)	Don Hambrick (USACE)
Susan Smiley (McCallum-Turner)	Cecilia Harper (USEPA)
Doug Schlagel (McCallum-Turner)	