



Serial: NPD-NRC-2010-016
February 22, 2010

10CFR52.79

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

**LEVY NUCLEAR PLANT, UNITS 1 AND 2
DOCKET NOS. 52-029 AND 52-030
SUPPLEMENT 3 TO RESPONSE TO SUPPLEMENTAL REQUEST FOR ADDITIONAL
INFORMATION REGARDING THE ENVIRONMENTAL REVIEW**

- References:
1. Letter from Douglas Bruner (NRC) to James Scarola (PEF), dated September 25, 2009, "Supplemental Request for Additional Information Regarding the Environmental Review of the Combined License Application for the Levy Nuclear Power Plant, Units 1 and 2"
 2. Letter from John Elnitsky (PEF) to U. S. Nuclear Regulatory Commission (NRC), dated December 14, 2009, "Response to Supplemental Request for Additional Information Regarding the Environmental Review", Serial: NPD-NRC-2009-242
 3. Letter from John Elnitsky (PEF) to U. S. Nuclear Regulatory Commission (NRC), dated January 29, 2010, "Supplement 1 to Response to Supplemental Request for Additional Information Regarding the Environmental Review", Serial: NPD-NRC-2010-008
 4. Letter from John Elnitsky (PEF) to U. S. Nuclear Regulatory Commission (NRC), dated February 16, 2010, "Supplement 2 to Response to Supplemental Request for Additional Information Regarding the Environmental Review", Serial: NPD-NRC-2010-010

Ladies and Gentlemen:

Progress Energy Florida, Inc. (PEF) hereby submits a supplemental response to the Nuclear Regulatory Commission's (NRC) request for additional information provided in Reference 1.

A supplemental response to two of the NRC questions (9.3-6 and 9.3-18) is addressed in Enclosure 1. Enclosure 1 also identifies changes that will be made in a future revision of the Levy Nuclear Plant Units 1 and 2 application.

If you have any further questions, or need additional information, please contact Bob Kitchen at (919) 546-6992, or me at (727) 820-4481.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 22, 2010.

Sincerely,



John Elnitsky
Vice President
Nuclear Plant Development

Enclosure

cc : U.S. NRC Region II, Regional Administrator
Mr. Brian C. Anderson, U.S. NRC Project Manager
Mr. Douglas Bruner, U.S. NRC Environmental Project Manager

**Levy Nuclear Plant Units 1 and 2
Supplement 3 to Response to NRC Supplemental Request for Additional Information
Regarding the Environmental Review for the Combined License Application,
Dated September 25, 2009**

<u>NRC RAI #</u>	<u>Progress Energy RAI #</u>	<u>Progress Energy Response</u>
5.2.2-4	L-0561, L-0688 & L-0689	December 14, 2009; NPD-NRC-2009-242, January 29, 2010; NPD-NRC-2010-008 & February 16, 2010; NPD-NRC-2010-010
9.3-2	L-0562	December 14, 2009; NPD-NRC-2009-242
9.3-3	L-0563	December 14, 2009; NPD-NRC-2009-242
9.3-4	L-0564	December 14, 2009; NPD-NRC-2009-242
9.3-5	L-0565	December 14, 2009; NPD-NRC-2009-242
9.3-6	L-0566, L-0700 & L-0701	December 14, 2009; NPD-NRC-2009-242 & Supplemental response enclosed – see following pages
9.3-7	L-0567	December 14, 2009; NPD-NRC-2009-242
9.3-8	L-0568	December 14, 2009; NPD-NRC-2009-242
9.3-9	L-0569	December 14, 2009; NPD-NRC-2009-242
9.3-10	L-0570	December 14, 2009; NPD-NRC-2009-242
9.3-11	L-0571	December 14, 2009; NPD-NRC-2009-242
9.3-12	L-0572	December 14, 2009; NPD-NRC-2009-242
9.3-13	L-0573	December 14, 2009; NPD-NRC-2009-242
9.3-14	L-0574	December 14, 2009; NPD-NRC-2009-242
9.3-15	L-0575	December 14, 2009; NPD-NRC-2009-242
9.3-16	L-0576	December 14, 2009; NPD-NRC-2009-242
9.3-17	L-0577	December 14, 2009; NPD-NRC-2009-242
9.3-18	L-0578 & L-702	December 14, 2009; NPD-NRC-2009-242 & Supplemental response enclosed – see following pages
9.3-19	L-0579	December 14, 2009; NPD-NRC-2009-242
9.3-20	L-0580	December 14, 2009; NPD-NRC-2009-242
USACE-14	L-0581	December 14, 2009; NPD-NRC-2009-242

NRC Letter No.: ER-NRC

NRC Letter Date: September 25, 2009

NRC Review of Environmental Report

NRC RAI #: 9.3-6

Text of NRC RAI:

Clarify discrepancies in wetland acreage as reported for each site in the EFS and AA.

The table for Criterion P6 – Wetlands (page 107 of EFS) identifies 61 acres of wetlands on the Levy 2 site (i.e., the preferred LNP site analyzed in the ER). Applying the rating scale, Levy 2 was assigned a rating of 4 for containing between 60 and 300 acres of wetlands (Table 2, Potential Site Preliminary Technical Evaluation Screening, page 22 of EFS; Table 9.3-4, Technical Evaluation Screening for Potential Sites, page 9-92 of ER). Examining NWI maps suggests that many hundreds of acres of wetlands are present on the Levy 2 site. CH2M Hill's (2009) Levy Nuclear Units 1 and 2 Section 404(b)(1) Alternatives Analysis (AA) identifies 1742.38 ac of wetlands on the LNP site using NWI maps, and 1691.96 ac using FLUCCS maps (Table 7, Total Estimated Wetland acreages for Each of the Five Final Candidate Siting Areas, page 34). The AA estimates correspond closely with the actual field delineations conducted for the LNP site – about 2000 ac of wetlands over the 3505 ac LNP site. Table 7 from the AA identifies 2173.15 acres of wetlands (based on NWI maps) for Putnam as compared to 105 ac of wetlands in the EFS Criterion P6 Table. Similarly, the AA identifies 1168.97 acres of wetlands (based on NWI maps) for Crystal River as compared to 123 acres of wetlands in the EFS. There are similar inconsistencies in the number of wetlands for the other sites. Clarify these wetland acreage discrepancies between the EFS and the AA and, as appropriate, revise the estimated number of wetlands for each site and ratings within the EFS and ER.

PGN RAI ID #: L-0700 and L-0701

PGN Response to NRC RAI:

This Request for Additional Information (RAI) was answered in Letter NPD-NRC-2009-242 to the Nuclear Regulatory Commission (NRC), dated December 14, 2009. An email from Don Hambrick (USACE) to Doug Bruner (NRC) on February 1, 2010, requested further clarification on apparent discrepancies between ER Table 9.3-5 and Table A-3 in Attachment A "Supplemental Analysis for New Nuclear Baseload Generation Addition Evaluation of Florida Sites [EFS], October 2007 Appendix IV – McCallum-Turner Siting Study" (002 Attachment 9.3.6-1A.pdf). Specifically, the email stated the two items as shown below, which are then followed by the PGN response to that item:

"1. Discrepancies between Tables 9.3-5 on page 17 of 57 of NPD-NRC-2009-242 and A-3 on page 9 of Attachment A for rating for environment for Putnam 1, 2 & 3; and transmission lines for Crystal River."

PGN Response to Item 1:

Environmental Report (ER) Table 9.3-5 is based on information presented in the "Supplemental Analysis for New Nuclear Baseload Generation Addition Evaluation of Florida Sites [EFS]." ER

Table 9.3-5 will be revised in a future revision to the ER to agree with the values listed in Table A-3 of EFS Supplemental Analysis. The revised ER Table 9.3.5 is included below.

"2. The notes for this table states that "White = neutral". I have not found an explanation of what "neutral" means in the EFS. How is "White = neutral" different from "Green = not aware of any significant concerns"? Does "White" really mean that the site was not rated/reviewed for that category?"

PGN Response to Item 2:

The "white" or no color listed in the table is an indication that not enough information was available at the time of the analysis to fully characterize a site. Table 9.3-5 of the ER will be revised to include this definition in the table notes (see revised table below).

Associated LNP COL Application Revisions:

Table 9.3-5 will be updated in a future revision of the ER.

Table 9.3-5 (Sheet 1 of 2)
Summary of Screening Evaluation for Potential Sites

Potential Sites	Composite Technical Screening Order	Final Ranking		PEF Preliminary Input					
		Technical Screening Top 8	PEF Down-Select Decision	Water Source	Transmission	Community Support	Economic Development	Environment	Legislative
Taylor	1	Taylor	Taylor	Gulf of Mexico	Green	Green	Yellow	Yellow	
Lafayette	2	Lafayette	Lafayette	Suwannee River	Green	Yellow	Red	Yellow	
Levy 2	3	Levy 2	Levy 2	Florida Barge Canal	Green	Green	Green	Yellow	
Gilchrist	4	Gilchrist	(Not Selected)	Suwannee/ Santa Fe	Green	Yellow	Red	Yellow	
Crystal River	5	Crystal River	Crystal River	Gulf of Mexico	Yellow	Green	Yellow	Green	Green
Levy 3	6	Levy 3	Levy 3	Gulf of Mexico	Green	Green	Yellow	Yellow	
Liberty 1	7	Liberty	(Not Selected)	Apalachicola River	Red	Yellow	Green	Yellow	Yellow
Dixie	8	Dixie	Dixie	Suwannee River	Green	Yellow	Red	Yellow	Yellow
Levy 1	9	(Not in Top 8)	(Not Selected)	Suwannee River	Green	Yellow	Red	Yellow	
Putnam 2	10	(Not in Top 8)	(Not Selected)	St. Johns River	Yellow	Yellow	Yellow		
Putnam 3	11	(Not in Top 8)	Putnam 3	St. Johns River	Yellow	Yellow	Yellow		

Table 9.3-5 (Sheet 2 of 2)
Summary of Screening Evaluation for Potential Sites

Potential Sites	Composite Technical Screening Order	Final Ranking			PEF Preliminary Input				
		Technical Screening Top 8	PEF Down-Select Decision	Water Source	Transmission	Community Support	Economic Development	Environment	Legislative
Manatee	12	(Not in Top 8)	(Not Selected)	Manatee River	Yellow		Red	Yellow	
Hillsborough	13	(Not in Top 8)	(Not Selected)	Tampa Bay	Yellow	Red	Red	Yellow	
Putnam 1	14	(Not in Top 8)	(Not Selected)	St. Johns River	Yellow	Yellow	Yellow		
Gulf	15	(Not in Top 8)	(Not Selected)	Gulf of Mexico	Red	Yellow	Red	Yellow	Yellow
Highlands	16	(Not in Top 8)	Highlands	Kissimmee River	Green	Green	Green	Yellow	
Seminole	17	(Not in Top 8)	(Not Selected)	St. Johns River	Green	Red	Red		
Liberty 2	18	(Not in Top 8)	(Not Selected)	Ochlockonee River	Red	Green	Yellow	Yellow	
Volusia	19	(Not in Top 8)	(Not Selected)	St. Johns River	Green	Red	Yellow		
Calhoun	20	(Not in Top 8)	(Not Selected)	Chipola River	Red	Yellow	Yellow	Yellow	Yellow

Notes:

Green = no significant concerns

Yellow = some potential concerns

Red = some significant concerns

No color = insufficient data available to characterize

Source: Reference 9.3-001

Attachments/Enclosures:

None.

NRC Letter No.: ER-NRC

NRC Letter Date: September 25, 2009

NRC Review of Environmental Report

NRC RAI #: 9.3-18

Text of NRC RAI:

Explain why transmission line impacts on ecological resources were rated MODERATE for Crystal River and SMALL for the LNP.

Explain why transmission line impacts on ecological resources were rated MODERATE for Crystal River (ER page 9-67) and SMALL for LNP (ER page for 9-81) when land commitments, construction impacts and operational impacts are generally expected to be similar.

PGN RAI ID #: L-0702

PGN Response to NRC RAI:

This RAI was previously answered in Letter NPD-NRC-2009-242 to the NRC dated December 14, 2009. An email from Don Hambrick (USACE) to Doug Bruner (NRC) on February 1, 2010, requested further clarification of LEDPA. Specifically, the email stated:

“3. Page 51 of 57 of NPD-NRC-2009-242: The applicant has separated out differently the portions of the transmission line corridors that were reviewed/rated for the ER (NEPA?), i.e. up to the first substations; versus that for the LEDPA analysis, i.e. all of the transmission corridors to be upgraded. Since the EIS now includes review of all of the transmission corridors to be upgraded, should not the ER (NEPA) review be the same as that done for LEDPA?”

PGN Response to Item 3:

The scope of the ER focuses on the impacts of the transmission lines from the plant switchyard to its connections with existing systems, as defined in the Environmental Standard Review Plan NUREG-1555 Section 3.7. For the LNP project, this connection was defined as the transmission lines from the proposed plant to the first substation, as described in ER Subsection 1.1.5.

The LEDPA analysis was developed to evaluate the impacts for a larger scope, related to Clean Water Act requirements, and thus evaluated transmission line impacts associated with the direct connection to the first substation as well as impacts associated with the system reliability considerations needed beyond the first substation. As discussed in response to RAI 9.3-18 (L-0578) provided in Letter NPD-NRC-2009-242, ER Subsections 4.1.2, 9.3.3.1.10, 9.3.3.2.10, 9.3.3.3.10 and 9.3.3.4.10 will be updated with a discussion on how the LEDPA analysis of transmission line impacts differs from the ER evaluation of impacts. Information regarding the transmission system to the first substation and beyond is available in either the ER or the LEDPA analysis.

Associated LNP COL Application Revisions:

No COLA revisions have been identified associated with this response.

Attachments/Enclosures:

None.