

Serial: NPD-NRC-2010-029

April 12, 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 8 TO RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION **REGARDING THE ENVIRONMENTAL REVIEW** 

References:

- Letter from Douglas Bruner (NRC) to James Scarola (PEF), dated February 24, 2009, "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 Garry D. Miller (PEF) to the U. S. Nuclear Regulatory Commission dated March 27, 2009, "Response to Request for Additional Information Regarding the Environmental Review", Serial NPD-NRC-2009-042

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 one of the NRC questions (4.4.2-3) is addressed in the enclosure. The enclosure also identifies a change 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 April 12, 2010.

Sincerely.

John Elnitsky **∜**ice President

**Nuclear Plant Development** 

Enclosure

U.S. NRC Region II, Regional Administrator

Mr. Brian C. Anderson, U.S. NRC Project Manager

Profess Daughasa-Bruner, U.S. NRC Environmental Project Manager

P.O. Box 14042

St. Petersburg, FL 33733

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## Levy Nuclear Plant Units 1 and 2 Supplement 8 to Response to Request for Additional Information Regarding the Environmental Review, dated February 24, 2009

NRC RAI # 2.7-1	Progress Energy RAI # L-0076	Progress Energy Response March 27, 2009; NPD-NRC-2009-042
3.3-1	L-0077	March 27, 2009; NPD-NRC-2009-042
4.5-1	L-0078	March 27, 2009; NPD-NRC-2009-042
5.4.4-1	L-0079	March 27, 2009; NPD-NRC-2009-042
7.1-1	L-0401	June 12, 2009; NPD-NRC-2009-107
2.7.5-1	L-0508	July 24, 2009; NPD-NRC-2009-172
3.6.3-1	L-0082	March 27, 2009; NPD-NRC-2009-042
5.3.3-1	L-0083	March 27, 2009; NPD-NRC-2009-042
2.3.1-1	L-0398	June 12, 2009; NPD-NRC-2009-107
2.3.1-2	L-0085	March 27, 2009; NPD-NRC-2009-042
2.3.1-3	L-0399	June 12, 2009, NPD-NRC-2009-107
2.3.1-4	L-0087	March 27, 2009; NPD-NRC-2009-042
2.3.1-5	L-0088	March 27, 2009; NPD-NRC-2009-042
2.3.1-6	L-0089	March 27, 2009; NPD-NRC-2009-042
2.3.3-1	L-0090	March 27, 2009; NPD-NRC-2009-042
2.3.3-2	L-0091	March 27, 2009; NPD-NRC-2009-042
4.6-1	L-0092	March 27, 2009; NPD-NRC-2009-042
4.6-2	L-0093	March 27, 2009; NPD-NRC-2009-042
5.2.2-1	L-0396	June 12, 2009; NPD-NRC-2009-107
5.2.2-2	L-0095	March 27, 2009; NPD-NRC-2009-042
5.2.2-3	L-0522	July 29, 2009; NPD-NRC-2009-166
5.3.2.1-1	L-0097	March 27, 2009; NPD-NRC-2009-042
2.4.2-1.	L-0098	March 27, 2009; NPD-NRC-2009-042
2.4.2-2	L-0099	March 27, 2009; NPD-NRC-2009-042
2.4.2-3	L-0100	March 27, 2009; NPD-NRC-2009-042
4.7-1	L-0101	March 27, 2009; NPD-NRC-2009-042
2.4.1-1	L-0402	June 12, 2009; NPD-NRC-2009-107
2.4.1-2	L-0403	June 12, 2009; NPD-NRC-2009-107
2.4.1-3	L-0533 & L-0674	September 3, 2009; NPD-NRC-2009-203 & November 23, 2009; NPD-NRC-2009-233
2.4.1-4	L-0405 & L-0538	June 12, 2009; NPD-NRC-2009-107; & August 31, 2009; NPD-NRC-2009-192
2.4.1-5	L-0106	March 27, 2009; NPD-NRC-2009-042
4.3.1-1	L-0406 & L-0675	June 12, 2009; NPD-NRC-2009-107 & November 23, 2009; NPD-NRC-2009-233
4.3.1-2	L-0407	June 12, 2009; NPD-NRC-2009-107

NRC RAI # 4.3.1-3	Progress Energy RAI # L-0535	Progress Energy Response August 31, 2009; NPD-NRC-2009-192
4.3.1-4	L-0110	March 27, 2009; NPD-NRC-2009-042
4.3.1-5	L-0408 `	June 12, 2009; NPD-NRC-2009-107
4.3.1-6	L-0112	March 27, 2009; NPD-NRC-2009-042
4.3.1-7	L-0409	June 12, 2009; NPD-NRC-2009-107
4.7-2	L-0114	March 27, 2009; NPD-NRC-2009-042
5.3.3.2-1	L-0410	June 12, 2009; NPD-NRC-2009-107
2.5.1-1	L-0116	March 27, 2009; NPD-NRC-2009-042
2.5.2-1	L-0412	June 12, 2009; NPD-NRC-2009-107
2.5.2-2	L-0118	March 27, 2009; NPD-NRC-2009-042
2.5.2-3	L-0119	March 27, 2009; NPD-NRC-2009-042
2.5.2-4	L-0120	March 27, 2009; NPD-NRC-2009-042
2.5.4-1	L-0413	June 12, 2009; NPD-NRC-2009-107
4.4.2-1	L-0524	July 29, 2009; NPD-NRC-2009-166
4.4.2-2	L-0123	March 27, 2009; NPD-NRC-2009-042
4.4.2-3	L-0124 & L-0760	March 27, 2009; NPD-NRC-2009-042 &
		supplemental response enclosed; see following pages
4.4.2-4	L-0125	March 27, 2009; NPD-NRC-2009-042
4.4.2-5	L-0126	March 27, 2009; NPD-NRC-2009-042
4.4.2-6	L-0127	March 27, 2009; NPD-NRC-2009-042
4.4.2-7	L-0128	March 27, 2009; NPD-NRC-2009-042
4.4.2-8	L-0129	March 27, 2009; NPD-NRC-2009-042
4.4.2-9	L-0523	July 29, 2009; NPD-NRC-2009-166
4.4.2-10	L-0131	March 27, 2009; NPD-NRC-2009-042
4.7-1	L-0132	March 27, 2009; NPD-NRC-2009-042
5.11-1	L-0133	March 27, 2009; NPD-NRC-2009-042
5.8.2-1	L-0134 & L-0690	March 27, 2009; NPD-NRC-2009-042 & January 29, 2010; NPD-NRC-2010-011
9.4.1-1	L-0135 .	March 27, 2009; NPD-NRC-2009-042
9.4.1-2	L-0136	March 27, 2009; NPD-NRC-2009-042
9.4.2-1	L-0521	July 29, 2009; NPD-NRC-2009-166
9.4.2-2	L-0138	March 27, 2009; NPD-NRC-2009-042
9.4.2-3	L-0139	March 27, 2009; NPD-NRC-2009-042
9.3-1	L-0140	March 27, 2009; NPD-NRC-2009-042
9.3.2.1-1	L-0141	March 27, 2009; NPD-NRC-2009-042
3.7-1	L-0142	March 27, 2009; NPD-NRC-2009-042
3.7-2	L-0143	March 27, 2009; NPD-NRC-2009-042
4.8.3-1	L-0144	March 27, 2009; NPD-NRC-2009-042
6.2-1	L-0145	March 27, 2009; NPD-NRC-2009-042

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NRC Letter No.: ER-NRC

NRC Letter Date: February 24, 2009

**NRC Review of Environmental Report** 

NRC RAI #: 4.4.2-3

#### **Text of NRC RAI:**

Provide the most current estimate of numbers of workers, by labor category, needed for construction; and provide revised impact analyses that reflect this estimate.

Section 4.4.2 of the ER provides an estimate of the construction workforce from 2010 through 2017, specifying welders, fabricators, carpenters, millwrights, electricians, ironworkers, laborers, and pipefitters as typical of the workforce. Verify that the ER reflects the most current estimate of numbers of workers needed for construction, according to the manufacturer of the reactor. If applicable, provide an updated estimate of workforce numbers broken down by craft labor categories used in Bureau of Labor statistics with estimated numbers of each category per year. If appropriate, revise impact analyses based on the revised estimate. These data will enable NRC staff to assess socioeconomic impacts associated with employment and population change.

#### **PGN RAI ID #: L-0760**

## **PGN Response to NRC RAI:**

This Request for Additional Information (RAI) was answered in Letter NPD-NRC-2009-042 to the Nuclear Regulatory Commission (NRC), specifically response L-0124, dated March 27, 2009. Revisions listed in that RAI to the Environmental Report (ER) were incorporated into Revision 1 of the Combined License Application (COLA). An e-mail from Michelle Moser to Paul Snead (Progress Energy Florida [PEF]), copying Doug Bruner (NRC), on March 9, 2010, requested that PGN:

"Provide a table that shows the annual peak workforce over the entire project schedule that clearly identifies the number of operations workers onsite and clarifies when each unit would begin commercial operation."

The following response supplements the L-0124 response; both are needed for a complete response:

This response provides the best available information at this time related to the Levy Nuclear Plant (LNP) project schedule and associated staffing. The updated review schedule, the currently anticipated contested hearings as well as mandatory hearings in order to issue the LNP COL, and the delay in on-site construction activities until the COL is issued result in extended commercial in-service dates for LNP as compared to the dates provided in the latest revision of the COL application. PEF expects the LNP in-service dates will be consistent with the Florida certificate of need and will reflect bringing LNP into service as early as is commercially reasonable. To facilitate use of the existing information by the NRC, the Summary Table provided also assigns generic years to allow for future shifts in the schedule. The relative magnitude of the potential impacts identified in ER section 4.4 are not expected to change due to a minor shift in schedule.

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As noted previously, construction oversight for LNP Units 1 and 2 will be performed by The Shaw Group, Inc. (Shaw). The following table summarizes the annual peak construction workforce over the entire project from Attachment 4.4.2-3A of L-0124 based on Shaw's estimates from January of 2009. Regarding the number of operations workers on site, ER Section 5.8 states the total number of operations workers (773) as well as the frequency of fueling outages (approximately 800 additional workers every 18 months); however, this information is not broken out by unit or year. To facilitate use of the existing information by the NRC, PEF has estimated the allocation of these operations and outage workers in the Summary Table provided.

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# **Estimated Total Workforce by Year**

Original Shaw Estimated Schedule Year	2009	2010	2011	2012	2013	2014	2015	2016	2017ª	2018 <sup>b</sup>
Generic Schedule	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Non-Unit Specific	226	746	907	1212	1434	1453	1229	468	36	
Unit 1 Construction			80	672	996	991	711	60		
Unit 1 Operations		÷						500	387	387
Unit 2 Construction				80	672	996	991	711	60	
Unit 2 Operations							•		386	386
Outage Workers (1 Unit) Total Annual Peak							-		-	800
Workforce	226	746	987	1964	3102	3241	2924	1739	869	1173

<sup>&</sup>lt;sup>a</sup>Unit 1 Starts Commercial Operation <sup>b</sup>Unit 2 Starts Commercial Operation

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## **Associated LNP COL Application Revisions:**

Environmental Report Section 4.4.2 will be clarified as follows:

The sentence "A combined workforce of 600 workers is estimated for 2019, based on the 200 remaining construction workers at LNP 2 and an initial operations workforce of 500 for LNP 1." will be replaced with

"A combined workforce of 869 workers is estimated for the first year of LNP 1 operation, based on the 96 (approximately 100) remaining construction workers at LNP 2 and an initial operations work force of 773 for LNP 1 and LNP 2."

### Attachments/Enclosures:

None.