

STPCOLAEISCom Resource

From: Julie Wicker [Julie.Wicker@tpwd.state.tx.us]
Sent: Wednesday, June 09, 2010 4:21 PM
To: STPCOLAEIS Resource
Cc: Kathy Boydston
Subject: TPWD comments on STP DEIS
Attachments: STP_DEIS_project14959.pdf

Please see the attached Texas Parks and Wildlife Department comments regarding the Draft Environmental Impact Statement for Combined Licenses for the South Texas Project Electric Generating Station, Units 3 and 4 (Draft Number NUREG-1937). A hard copy of this correspondence will also be mailed to the following address:

Ms. Jessie Muir
Mail Stop: T7-E30
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

If you have any questions regarding these comments, please contact Amy Turner at (361) 576-0022 or Amy.Turner@tpwd.state.tx.us

Julie C. Wicker
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Texas Parks and Wildlife Department, Wildlife Division
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"Kathy Boydston" <Kathy.Boydston@tpwd.state.tx.us>
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Ms. Jessie Muir
Mail Stop: T7-E30
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

RE: Draft Environmental Impact Statement (DEIS) for Combined Licenses for the South Texas Project Electric Generating Station, Units 3 and 4, Matagorda County (Draft Number NUREG-1937)

Dear Ms. Muir:

The Texas Parks and Wildlife Department (TPWD) has received your request for information regarding potential impacts to threatened and endangered species and for information on other issues of concern relating to the project referenced above. Under §12.0011 of the Parks and Wildlife Code, TPWD is charged with "providing recommendations that will protect fish and wildlife resources to local, state, and federal agencies that approve, permit, license, or construct developmental projects" and "providing information on fish and wildlife resources to any local, state, and federal agencies or private organizations that make decisions affecting those resources."

The South Texas Project Nuclear Operating Company (STPNOC) has submitted an application for combined construction and operating licenses (COL) for South Texas Project Electric Generating Station (STP), Units 3 and 4, Matagorda County. STPNOC currently operates two nuclear generating units (existing STP Units 1 and 2) on the STP site. The proposed location for the new units is approximately 2,000 feet northwest of the existing STP site. The proposed site is located on approximately 12,200 acres in a rural portion of Matagorda County, approximately 12 miles south-southwest of the city limits of Bay City, Texas, and 10 miles north of Matagorda Bay, along the west bank of the Colorado River.

The STP site currently contains two existing nuclear generating units, associated facilities, and onsite transmission line corridors that occupy approximately 1,750 acres of the STP site. The main cooling reservoir (MCR) occupies approximately 7,000 acres of the STP site with the remainder of the approximately 12,200 acres being undeveloped or utilized for agriculture and cattle grazing.

Section 3.2.2.3 Other Permanent Plant Environment Interfacing Structures, Systems or Components

Transmission Lines

Construction of the proposed reactors would not require the construction of new offsite transmission corridors or expansion of existing corridors. According to the DEIS, the power transmission system for the new units would use five of the nine 345-kV transmission lines that currently connect to existing STP Units 1 and 2; a portion of the system would be upgraded, perhaps necessitating the use of board roads within wetlands. In addition, a new 345-kV onsite switchyard and a new 345-kV tie-line from Units 1 and 2 to the new 345-kV switchyard would be constructed. Activities associated with building the new onsite switchyard and connecting transmission lines would occur in areas previously disturbed during site development activities associated with Units 1 and 2.

Two existing transmission lines running approximately 20 miles from the STP site to the Hillje Substation located northwest of the STP site would be upgraded. The upgrade would involve reconductoring the two lines to accommodate the additional load of Units 3 and 4, and some transmission line towers would be replaced to support the replacement conductors.

Railroad Lines

According to the DEIS, a portion of the plant materials would enter and exit the site via a railroad line on the site. An existing nine-mile spur that ran from the STP site to Buckeye, Texas is no longer in service. The service would be reestablished and the railroad line upgraded by installing new ballast or rail sections within the existing rail bed.

Section 4.3.1.1 Impacts to Terrestrial Resources-Site and Vicinity

Impacted Areas

All project activities for building Units 3 and 4 would occur within the existing STP site boundary and on land previously disturbed during construction of Units 1 and 2. Permanent impacts would affect approximately 300 acres and would include disturbance for the proposed power block for Units 3 and 4; the switchyard; the cooling tower area; and the intake, pipeline, and discharge areas for the cooling water system. Approximately 240 additional acres would be

disturbed for temporary facilities including a concrete batch plant, material storage areas, laydown areas, heavy haul road, parking areas, borrow areas and spoils storage.

Permanent impacts of the proposed project are summarized as follows from Table 4-2:

	Existing Facilities	Maintained and Disturbed Areas	Mixed Grassland	Other	Scrub-Shrub	Wetland	Main Cooling Reservoir
Total Permanent Impacts (acres)	42.1	73.6	6.8	4.9	87.2	0	29.2

The acreage identified above is less than 300 acres of permanent impacts. According to the DEIS, an additional 56 acres of unidentified habitat type will be disturbed.

Request: TPWD requests that the Nuclear Regulatory Commission and STPNOC provide a description of the habitat type of the approximately 56 acres of permanent impacts that are not outlined in the DEIS. In addition, TPWD requests that the category “Other” be defined as a specific habitat type(s).

According to the DEIS, STPNOC has committed to the restoration of areas temporarily disturbed by construction activities through grading, landscaping and replanting of these areas.

Recommendation: TPWD recommends that all temporary construction impacts be restored to preconstruction contours and conditions and that STPNOC prepare a restoration plan and provide this plan to TPWD for review and comment.

Heavy Haul Road

The DEIS describes a heavy haul road that would be constructed disturbing approximately nine acres. The proposed road would travel around to the east of the existing essential cooling pond and then south toward the barge slip. A total of seven culverts would be used to span drainage areas associated with the roadway.

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Three of the proposed road crossings have existing culverts that would be replaced, three additional culverts would be needed to span existing drainages, and one culvert would be added as part of preparing a new drainage area. This section of the DEIS does not clarify if the proposed haul road and associated wetland impacts from the barge-slip to the construction site is a new road or an expansion of the existing road.

Section 9.3.5.3 Obviously Superior Sites

TPWD concurs with the NRC's evaluation that none of the proposed alternative sites were determined to be environmentally preferable to the proposed STP site. TPWD recommends the proposed expansion, the addition of Units 3 and 4, be constructed at the existing facility.

Compensatory Mitigation

TPWD staff were not able to locate a specific compensatory mitigation plan for the project's proposed wetland plan or any other habitats proposed to be impacted in the DEIS. TPWD's review of Section 4.11 of the DEIS, Measures and Controls to Limit Adverse Impacts During Construction Activities, provides some very generalized measures and controls that the review team considered in its evaluation of impacts of building Units 3 and 4. Table 4-6 also provides the team's list of measures and controls proposed by STPNOC to limit adverse impacts during building Units 3 and 4. Section 4.12 of the DEIS, Summary of Preconstruction and Construction Impacts and Table 4-7 provide a summary of the impact levels determined by the review team, which are categorized as small, moderate, or large.

The review team's determination of the impact category levels is based on the assumption that the mitigation measures identified in the Environmental Report (ER) or activities planned by various state and county governments, such as infrastructures upgrades (discussed throughout this chapter), are implemented. Failure to implement these upgrades might result in a change in the impact category. Possible mitigation measures of adverse impacts, where appropriate, are presented in Section 4.11. However, none of the mitigation measures and controls includes compensatory mitigation for the project's proposed impacts to fish and wildlife habitat including waters of the United States.

Recommendation: TPWD recommends that STPNOC formulate a compensatory mitigation plan for all impacts to fish and wildlife habitat,

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including wetlands and shallow water habitat for the proposed project. This would include impacts to species and habitats covered under federal law and state resource habitat types not covered by state or federal law. At a minimum, TPWD recommends a replacement ratio of 1:1 for state resource habitat types. TPWD requests the opportunity to review and comment on the compensation plan.

TPWD appreciates the opportunity to work with the Nuclear Regulatory Commission to ensure these projects are developed in the most environmentally sensitive manner as is possible. If you have any questions regarding our comments, please contact Amy Turner with our Wildlife Habitat Assessment Program, Victoria Office, at (361) 576-0022.

Sincerely,

A handwritten signature in black ink, appearing to read 'Clayton Wolf', with a long horizontal flourish extending to the right.

Clayton Wolf
Director, Wildlife Division

CW:AJT:gg.14959