

## TurkeyPointCEm Resource

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**From:** Laura Reynolds [tropicalaudubon@gmail.com]  
**Sent:** Monday, August 16, 2010 11:33 PM  
**To:** TurkeyPointCOLEIS Resource  
**Subject:** Scoping Comments  
**Attachments:** NRC EIS Scoping comments 6&7.doc

At the recent public meeting in Homestead a hard copy of a similar document was handed in. Many of us were unable to attend because of a conflicting conference in Naples during that week.

Please accept these comments that are attached.

Thank you.  
Laura

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Laura Reynolds | Executive Director | Tropical Audubon Society

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Amended Scoping Comments  
Florida Power and Light Company  
Combined License for  
Turkey Point Units 6 & 7  
Dockets Nos. 52-040 and 52-041

Miami, Florida  
August 16, 2010

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts of the Turkey Point FPL power station on groundwater (quality or quantity), please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts on the Turkey Point FPL power station by hurricane activity since the plant went into service, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts on the Turkey Point FPL power station of future climate change and sea level rise, please provide them.

Please state all the projections for sea level rise used by the NRC.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to the “50-year electrical demand projections for the FPL service area” considering various climate change and sea level rise scenarios, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts of the Turkey Point FPL power station and its transmission lines on the environment, including any cost-benefit analyses, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts of construction and operation of the proposed Eastern Transmission Corridor and the proposed Western Transmission Corridor, on the environment, including any cost-benefit analysis, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts of utilizing reclaimed water as supplied by M-D County to the Turkey Point FPL power station in the future, including any cost-benefit analyses please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts of utilizing water from Radial Wells to the Turkey Point FPL power station in the future, including any cost-benefit analyses please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts of utilizing water from the Upper Floridan Aquifer to the Turkey Point FPL power station in the future, including any cost-benefit analyses please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts of utilizing water from the Lower Floridan Aquifer to the Turkey Point FPL power station in the future, including any cost-benefit analyses please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts of utilizing water from the remnant canal intake to the Turkey Point FPL power station in the future, including any cost-benefit analyses please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts of operation of the Turkey Point FPL power station on Biscayne National Park, in the past, currently, and in the future, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts of operation of the Turkey Point FPL power station on Everglades National Park, in the past, currently, and in the future, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts of operation of the Turkey Point FPL power station on Comprehensive Everglades Restoration Plan (CERP) Projects and CERP related projects, in the past, currently, and in the future, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts of operation of the Turkey Point FPL power station on the Everglades Mitigation Bank, in the past, currently, and in the future, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts of operation of the rock mining associated with the Turkey Point FPL power station on the environment in the past, currently, and in the future, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts of operation of the Turkey Point FPL power station on the Biscayne Aquifer, in the past, currently, and in the future, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts on humans and/or the environment of airborne pathogens from the Turkey Point FPL power station as a result of using reclaimed wastewater for cooling purposes, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts of airborne pathogens from the Turkey Point FPL power station on state or federal endangered or threatened species, as a result of using reclaimed wastewater for cooling purposes, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts on farm crops, wetlands, wildlife, and marine areas from airborne pathogens, as a result of using reclaimed wastewater for cooling purposes, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to the varieties and concentrations of known airborne toxic matter as a result of using reclaimed wastewater for cooling purposes, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to the number of fatal and non-fatal diseases from airborne toxic matter as a result of using reclaimed wastewater for cooling purposes, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts from airborne toxic matter on farm crops, wetlands, and marine areas, as a result of using reclaimed water for cooling purposes, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to the varieties and concentrations of airborne "emerging pollutants of concern" (EPOCs) as a result of using reclaimed wastewater for cooling purposes, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to

the number of fatal and non-fatal diseases from airborne EPOCs as a result of using reclaimed wastewater for cooling purposes, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts from airborne EPOCs on farm crops, wetlands, wildlife, and marine areas, as a result of using reclaimed water for cooling purposes, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to varieties and concentrations of pathogenic waste, toxic waste, EPOCs, chemical waste, and radioactive waste that will be disposed by deep well injection, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to the ultimate location(s) of the deep well injected wastes, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts of the biological forms that will be affected by deep well injected wastes, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to the geographical extent of the biological forms that will be affected by the deep well injected wastes, please provide them.

To the extent that you are aware of any of any consent decrees or administrative orders or settlements concerning underground injection control wells in Florida, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts of operation of underground injection control wells in the South Florida area, please provide them.

Please state the costs and benefits of constructing and operating Class I UIC wells for units 6&7.

Please state the costs and benefits of constructing and operating Class V UIC wells for units 6&7.

Please state the maximum pressure the deep well injection pumps will generate.

Please state the maximum water temperatures of the wastes that will be deep well injected.

Please state the affects of the geologic fracturing that will occur as a result of pressure,

temperature, exotic chemicals, and oxygen from deep well injections.

Please state the amount of waste seepage, by volume, into drinking water aquifers from deep well injection for units 6&7.

Please state the locations and extents of permitted ASR wells sites within 25 miles of units 6&7.

Please state the capacity of each of the permitted ASR well sites within 25 miles of units 6&7.

Please state the amount of heat that will be discharged into the atmosphere from units 6&7 and state the temperature differential between the discharged heat and the ambient temperature.

Please state the amount of water vapor that will be discharged into the atmosphere from units 6&7 and state the moisture differential between the discharged water vapor and the ambient humidity.

Please state the amount of heat that will be discharged into the stratosphere from units 6&7 and state the temperature differential between the discharged heat and the stratosphere.

Please state the amount of water vapor that will be discharged into the stratosphere from units 6&7 and state the moisture differential between the discharged water vapor and the stratosphere.

Please state the amount of greenhouse gases units 6&7 will contribute to the atmosphere.

Please state the amount of climate change units 6&7 will make to the environment.

Please state the amount of change units 6&7 will make to local weather conditions.

Please state the amount of change units 6&7 will make to hurricane formation, intensity, and longevity.

Please state the amount of change units 6&7 will make to tornado formation, intensity, and longevity.

Please state the amount of disruption to sheetflow of wetlands that the construction of units 6&7 will make including the plant site, all support facilities, all structures, all borrow pits (including rockmines,) all fencing, all roads, all berms, all pipelines, all transmission lines, all basins, all parking lots, and all vehicle usage.

Please state the amount of disruption to groundwater flow and the salt front that the construction of units 6&7 will make including the plant site, all support facilities, all structures, all borrow pits (including rockmines,) all fencing, all roads, all berms, all pipelines, all transmission lines, all basins, all parking lots, and all vehicle usage.

Please state the amount of disruption to listed species that the construction of units 6&7 will make including the plant site, all support facilities, all structures, all borrow pits (including

rockmines) all fencing, all roads, all berms, all pipelines, all transmission lines, all basins, all parking lots, and all vehicle usage.

Please state the amount of disruption to the biota of Biscayne National Park and adjacent bodies of Outstanding Florida Waters that the construction of units 6&7 will make including the plant site, all support facilities, all structures, all borrow pits (including rockmines,) all fencing, all roads, all berms, all pipelines, all transmission lines, all basins, all parking lots, and all vehicle usage.

Please state the worst case scenario and the worst timeline projection, as a result of hydrologic changes from units 6&7 for salt water intrusion affecting the municipal wellfields of Miami-Dade County, the City of Homestead, the City of Florida City, the Florida Keys Aqueduct Authority, and private well users.

Please state what protective measures will be taken to prevent salt water intrusion, as a result of hydrologic changes from units 6&7, to the municipal wellfields of Miami-Dade County, the City of Homestead, the City of Florida City, the Florida Keys Aqueduct Authority, and private well users.

Please state the "Need for Power" in Florida in light of a population decrease of 58,294 from April 1, 2008 to April 1, 2009.

Please state the "Need for Power" in the light of sole source municipal wellfields being contaminated with salt water by a sea level rise of 1 foot or less.

Please state the "Need for Power" in the light of large areas of infrastructure, residential and commercial real estate being flooded by a sea level rise of 1 foot or less.

Please state the "Need for Power" where units 6&7 is at the distant end of the electrical grid and is unable to send excess power to the east, the south, or the west.

Please state the dimensions, capacities, and location(s) of the water management feature(s) resulting from excavations of the FPL-Owned fill source (rockmines).

Please state the distance between the water management feature(s) and the salt front at the land's surface and the distance between the water management feature(s) and the salt front at the base of the Biscayne Aquifer.

Please publish a vertical profile of the land showing 1. the surface of the water management feature(s), 2. the depth of the water management feature(s), 3. the location of the current salt front at the land surface, and 4. the location of the current salt front at the base of the Biscayne Aquifer.

Please publish a map showing new and existing canals, pipelines, STAs, pump locations, and pump capacities associated with the water management feature(s).

Please state the specific material that will be used to line the water management feature(s) and state the minimum thickness of the lining.

Please state whether the lining of the water management feature(s) will be impervious to the flow of groundwater.

Please state how the lining of the water management feature(s) will be stabilized knowing that groundwater continually flows through the Biscayne Aquifer.

Please state the number of times the water management feature(s) can be drained and refilled while retaining its structural integrity.

Please publish the operating plan for the water management feature(s) and the emergency plan for hurricane tidal surges, toxic spills, or other contamination situations.

Please state the life-cycle costs of the water management feature(s).

Please state how long the applicant plans to own and operate the water management feature(s).

Please show the barge routes and state the number of barge trips for each route for units 6&7 that traverse the waters of Biscayne National Park and other protected waters.

Please state the sizes and drafts of the barges.

Please state the average speed and maximum speed of the barge trips.

Please state the increased damage to the benthic communities due to physical contact, turbidity, silt deposition, and wake disruptions.

Please state the amounts of cumulative damage to the benthic communities resulting from historic barge trips and the increased barge trips due to units 6&7.

Please state the plan for preventing barge collisions with manatees, turtles, and other protected species.

Please state the plan for minimizing the number of barge trips for units 6&7.

Please state the mitigation for damage to the benthic communities of Biscayne National Park and other protected waters.

Please show the plans to cleanse contamination from events such as fuel spills, chemical spills, tank ruptures, fires, weather related events, and other accidents where the contaminants will not automatically be routed to the industrial wastewater facility.

Please state, specifically, which wastewater batches will be deep well injected and which wastewater batches will be released into the unlined cooling canal system for both construction

activities and normal operation activities.

Please state the plan for protecting benthic communities for all alterations to the plant site affecting the marine environment.

Please state the plan for protecting manatees, turtles, dolphins, sawfish, and other protected species from non-explosive dredging activities.

Please state the plan for protecting manatees, turtles, dolphins, sawfish, and other protected species from explosive activities.

Please state, specifically, all additives and all additive quantities, injected into the cooling water, such as solvents, detergents, biocides, corrosion inhibitors, lubricants, scale inhibitors, oxygen removing agents, foam removing agents, salts, and any other chemicals.

Please state, specifically, all additives and all additive quantities that will be released to the atmosphere in gaseous, particulate, or droplet form, from the cooling towers and cooling water.

Please state the cumulative emissions of construction activities for each of the greenhouse gases including water vapor, carbon dioxide, methane, nitrous oxide, and ozone.

Please state the cumulative emissions of operation activities for each of the greenhouse gases including water vapor, carbon dioxide, methane, nitrous oxide, and ozone.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts of construction or operation of the Clear Sky switchyard, the Davis substation, the Miami substation, the Pennsuko substation or the Levee substation in the future, including any cost-benefit analysis, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts of the deep well injection of wastes exceeding the capacity of the wastes reservoir, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to the maximum geographical extent of the deep well injected waste reservoir for the duration of the operating license, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts of securing the storage of low-level solid radioactive wastes, including locations, structures, containers, damage from missiles, airborne solid wastes, water ingress and egress, fires, and cleanup, in the event of a tornado watch or warning is issued for the Turkey Point area, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts of securing the storage of low-level solid radioactive wastes, including locations, structures, containers, damage from missiles, airborne solid wastes, water ingress and egress, fires, and cleanup, in the event of a hurricane watch or warning is issued for the Turkey Point area, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts of deep well injection of radioactive wastes including annual expected amounts and the expected cumulative amount of each isotope for the duration of the requested operating license, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts of airborne radioactive releases to the atmosphere including best practices, precautions, the cumulative number of expected non-lethal cancers, and the cumulative number of expected lethal cancers for the duration of the requested operating license, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse radiological impacts of units 6 & 7 as a result of a sea level rise of 10 meters, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse radiological impacts of spent fuel storage as a result of a sea level rise of 10 meters.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse radiological impacts of decommissioning units 6&7 as a result of a sea level rise of 10 meters.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts of leaking buried pipes, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts of the creation of construction jobs, temporary jobs, and permanent jobs, please provide them.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts of climate change as a result of direct heating of the atmosphere, please provide them.

Please state the amount of sea level rise in combination with hurricane activity that would cause any uncontrolled releases of radioactivity to offsite areas.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to adverse impacts of equipment damage, facility damage, and structure damage at Units 3 & 4 due to Hurricane Andrew, please provide.

Please provide the NRC requirements to prevent offsite radiological releases for preparations due to a hurricane strike and the additional non-required steps that will be taken.

Please provide the NRC requirements to insure complete and continuous radiological monitoring of offsite releases for preparations due to a hurricane strike and the additional non-required steps that will be taken.

Please provide the NRC requirements to insure a continuous supply of offsite electrical power for preparations due to a hurricane strike and the additional non-required steps that will be taken.

Please provide the NRC requirements that insure complete and continuous functioning of the access roads needed to bring in firefighters, HAZMAT personnel, emergency medical services, security personnel, reliable communications, shift workers, NRC personnel and cleanup crews during and after a hurricane strike.

To the extent that you are aware of any documents or reports by any federal, state, local or regional government agency, FPL or any of its employees or contractors that relate to the permanent closure of solid fueled electrical generating plants as a result of units 6 & 7 becoming operational, please provide.

Respectfully submitted,  
(signatures waived to expedite delivery)

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