MIAMI-DADE COUNTY
Carlos Alvarez, Mayor

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RULES AND DIRECTIVES BRANCH USNRC

Chief, Rules, Announcements, and Directives Branch
Division of Administrative Services
Office of Administration
Mailstop TWB-05-B01M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Turkey Point Units 6 and 7 Nuclear Power Plant Environmental Impact Statement (EIS)

Dear Sir or Madame:

Miami-Dade County is supportive of FPL's goal to provide safe reliable power for our residents and visitors. However, the County is also committed to assuring that the project is constructed and operated in a manner that is protective of important water resources and our unique natural systems.

The County has been involved in the review of the Turkey Point Units 6 and 7 project since 2007, when FPL submitted an application to the Miami-Dade County Planning and Zoning Department for zoning approval of this project. Although few project details were available at that time, the zoning application was approved by the Miami-Dade County Board of County Commissioners in December 2007. The approval was conditioned upon the project's conformance with County requirements for projection of water resources and sensitive ecological receptors. Over arching issues include assuring the protection of surface and groundwater resources, protection of wetlands habitat, protection of rare, threatened and endangered species habitat, and consistency with local, state, and federal restoration goals for this area.

Water resources issues associated with this project include protection of water quality and the Biscayne Aquifer. The Biscayne Aquifer is a sole source aquifer providing high quality drinking water throughout Miami-Dade and Monroe Counties. Protection of this aquifer from contamination by chlorides and sodium from saline water sources is key to ensuring the continued ability to deliver safe drinking water from public well fields in Florida City and Homestead as well as from the Florida Keys Aqueduct Authority Navy Wells facility. The EIS should include an assessment of the potential impact of the project on water resources in this area.

The Turkey Point facility is located within the southeastern saline Everglades, which is a large, contiguous wetland system that consists of both freshwater and coastal wetlands. This area is strategically located in the watershed for the Florida Keys National Marine Sanctuary, Biscayne National Park, the Crocodile Lake National Wildlife Refuge, and the State of Florida's Card Sound Aquatic Preserve. In addition, the proposed transmission line corridor bisects this wetland system and continues westward into Everglades National Park, as well. This region provides habitat for many plant and animal species that are protected at the county, state and/or federal level, including the wood stork, Everglades snail kite, American crocodile, Florida panther, and Eastern indigo snake, among others. It is a known stop-over for migratory songbirds and waterfowl, and the proposed plant site provides significant shorebird habitat, as well. The EIS should also include an assessment of the impacts of the project on wetlands habitat and habitat for rare threatened and endangered species.

Although the NRC does not directly regulate transmission lines, Miami-Dade County understands that the Army Corps of Engineers (ACOE) will be a cooperating agency for this EIS. Since the Army Corps will be using the EIS as the basis for their Section 404 permit decision as it relates to the wetland impacts that would be necessary to construct the proposed plant and associated facilities, including the transmission lines, we strongly recommend the NRC include a comprehensive impacts analysis of all features that will or could potentially impact environmental resources, including wildlife and jurisdictional wetlands to be affected by the proposed transmission corridors.

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E-RIDS = ADM-03
Add = A. Kugler (AJK1)

The proposed plant and associated facilities are located within project areas for the Comprehensive Everglades Restoration Plan (CERP), which proposes to restore regional wetland functions in the region, including functions that provide direct benefits to Miami-Dade County's population through protection of surface and groundwater resources. The EIS should examine the compatibility of the plant and associated facilities, including transmission lines, with CERP and CERP restoration goals for this area.

Finally, the EIS should look ahead through the expected life of the new facilities, and should consider potential future conditions in the analysis, including a change in sea level. Sea level has been rising in this region since records were established, and could ultimately affect how the plant and associated facilities interact with the surrounding environment. Miami-Dade County recommends that the time period for projections of future conditions include the potential that the license would be renewable for a second operational period. This has been the case for the existing Units 3 and 4. Given FPL's operational record, there is no reason to assume otherwise for the proposed Units 6 and 7.

Thank you for this opportunity to comment. I am aware that my technical staff have met with NRC staff to discuss some of the issues associated with this project. County staff are also involved with reviewing this project as part of the Power Plant Siting Act Application that FPL has filed with the State of Florida. The County hopes to work closely with NRC staff on these issues and we envision that additional technical information will be provided by County staff in support of this effort as the EIS is developed.

If you have any questions please contact Mr. Lee N. Hefty, Assistant Director of DERM at 305-372-6750.

Sincerely,

Carlos Espinosa, PE
Director

c: Susanne Torriente, Sustainability Director