

BRAZOS RIVER CONSERVATION COALITION
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Michael Willingham
Project Manager
Environmental Projects Branch 1
Division of Site and Environmental Reviews
Office of New Reactors
U.S. NUCLEAR REGULATORY COMMISSION
Mail Stop T7-E30
Washington, DC 20555-0001

October 23, 2010

***RE: Luminant's Combined License Application for Comanche Peak Nuclear
Power Plant, Units 3 and 4, Somervell County and Hood County, Texas***

Mr. Willingham:

The Brazos River Conservation Coalition (BRCC) is a 501(c)(3) non-profit corporation formed in 2003 that now has over 600 members. The BRCC's mission is to monitor and protect the water quality of Lake Granbury and the Brazos River in Hood, Parker, and Palo Pinto counties.

At the September 21, 2010 public meeting in Glen Rose, Texas concerning the NRC's Draft Environmental Impact Statement (DEIS) about two new reactors for Luminant's Comanche Peak Nuclear Power Plant (CPNPP), BRCC presented written and verbal testimony to the effect that permitting the combined license application should be withheld until the applicant develops more definitive information on the water consumption and environmental impact to be associated with the new reactors' Blow Down Treatment Facility (BDTF).

The Brazos River Conservation Coalition reiterates the concerns expressed in its written submittal at the NRC meeting in Glen Rose, with particular emphasis on the following:

1. That, to date, the Nuclear Regulatory Commission has relied too heavily on preliminary design and performance data furnished by the Applicants to conclude that projections of water usage from Lake Granbury and the extended Brazos River system (including Possum Kingdom Lake) will not have *large* (*i.e.*, serious) long-term negative impact on the river and its lakes.
2. That a specific case in point is the Applicant's use of the annual average wet-bulb temperature (76°F) rather than the normal summer design wet-bulb temperature (78°F) to calculate BDTF cooling water consumption, indicating that a greater volume of cooling water will be needed at precisely the time of year when area and reactor water demand is at its maximum and drought conditions are most likely. In addition, the exhaust from the four large cooling towers and associated spray ponds should increase the design wet-bulb temperature for the cooling towers by 1 or 2 more degrees, thus further increasing the cooling tower sizes and the amount of water usage for make-up and blow-down.

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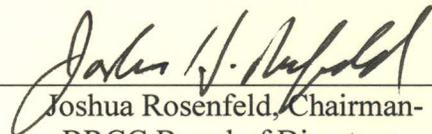
3. That the potential negative environmental effects of the reduced volume and increased salinity of water returned to the lake and river, along with the heat discharge, salt spray mist, noise, aerosol drift, visible atmospheric plume and disposable salt accumulation associated with the design of the Blow Down Treatment Facility planned to remove excess heat from the proposed reactors have yet to be accurately determined.

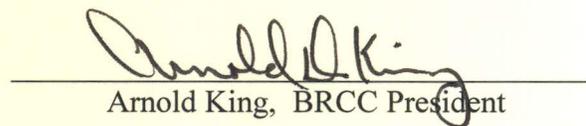
Additionally we are concerned that the Brazos River Authority's system for prioritizing and allocating water administered by the BRA clearly had not anticipated the enormous consumption of water necessary for additional reactors of the type that Luminant is proposing, and that "in the case of drought condition" that "BRA would apportion the reductions in water availability to all of its contract customers", including the residential and municipal consumers who could be subject to water rationing while the nuclear plant has *de facto* first call on water from the lake.

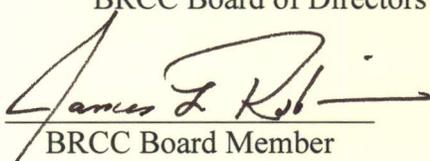
The developed communities in Hood County surrounding Lake Granbury and the river are entitled to a more studied and accurate assessment of the potential impact of the proposed new reactors before allowing the permitting process to go forward.

Respectfully submitted,

BRAZOS RIVER CONSERVATION COALITION:


Joshua Rosenfeld, Chairman-
BRCC Board of Directors


Arnold King, BRCC President


BRCC Board Member


BRCC Board Member


BRCC Board Member