

U.S. Nuclear Regulatory Commission Rockville, Maryland

Introduction

By letter dated June 30, 2009, Florida Power & Light Company (FPL) submitted to the U.S. Nuclear Regulatory Commission (NRC) an application for combined licenses (COLs) for construction and operation of two new commercial nuclear power reactors at its Turkey Point site in Miami-Dade County, Florida, which will be called Turkey Point Units 6 and 7. The Turkey Point site is located approximately 4.5 miles east of Homestead Florida and approximately 25 miles south of the City of Miami, Florida.

As part of the application, FPL submitted an environmental report (ER) prepared in accordance with the requirements of Title 10 of the *Code of Federal Regulations* (CFR) Part 51 and 10 CFR Part 52. The ER focuses on potential environmental effects from building and operating two new nuclear units at the Turkey Point site. It also includes an evaluation of the environmental consequences of alternatives, including the proposed actions, and any mitigating actions that may be taken. NRC regulations implementing the National Environmental Policy Act (NEPA) of 1969, as amended, are contained in 10 CFR Part 51, Subpart A. In addition, the NRC follows the Council on Environmental Quality regulations to the extent set forth in 10 CFR 51.10 and 10 CFR 51.14(b). NRC regulations related to the environmental review of COL applications are contained in 10 CFR 52, Subpart C.

The proposed actions associated with constructing and operating two new nuclear units at the Turkey Point site are: (1) The NRC issuance of COLs for construction and operation of two new base-load nuclear units at the Turkey Point site, and (2) U.S. Army Corps of Engineers (USACE) issuance of a permit pursuant to Section 404 of the Federal Water Pollution Control Act, (Clean Water Act) and Section 10 of the Rivers and Harbors Act to perform certain construction activities on the site. The USACE is participating with the NRC in preparing the environmental impact statement (EIS) as a cooperating agency and participates cooperatively on the review team, which consists of the NRC staff, contractor staff, and the USACE staff. The EIS will include an evaluation of the environmental impacts of the proposed actions and the environmental impacts of alternatives to the proposed actions, including the no-action alternative, alternatives related to the facility cooling and circulating water systems, and alternatives available for reducing or avoiding adverse environmental effects, in accordance with NUREG-1555, Standard Review Plan for Environmental Reviews for Nuclear Power Plants. It also will address alternative energy options. Finally, the EIS will include an evaluation of alternative sites to determine if there is an obviously superior alternative to the proposed site. In addition, the NRC staff is conducting a safety review of the FPL COL application in accordance with NUREG-0800. Standard Review Plans for the Review of Safety Analysis for Nuclear Power Plants.

On June 15, 2010, in accordance with 10 CFR 51.26, the NRC initiated the scoping process by publishing a Notice of Intent to Prepare an Environmental Impact Statement and Conduct Scoping Process in the *Federal Register* (75 FR 33851). The notice of intent (NOI) notified the public of the staff's intent to prepare an EIS and conduct scoping for the COL application. Through the notice, the NRC also invited the applicant; Federal, Tribal, State, and local government agencies; local organizations; and individuals to participate in the scoping process by providing oral comments at public meetings and/or submitting written suggestions and comments no later than August 16, 2010.

The scoping process provides an opportunity for public participation to identify issues to be addressed in the EIS and highlight public concerns and issues. The NOI identified the following objectives of the scoping process:

- Define the proposed action that is to be the subject of the EIS.
- Determine the scope of the EIS, and identify significant issues to be analyzed in-depth.
- Identify and eliminate from detailed study those issues that are peripheral or that are not significant.
- Identify any environmental assessments and other EISs that are being prepared or will be prepared that are related to, but not part of, the scope of the EIS being considered.
- Identify other environmental review and consultation requirements related to the proposed action.
- Identify parties consulting with the NRC under the National Historic Preservation Act of 1966, as amended as set forth in 36 CFR 800.8(c)(1)(i).
- Indicate the relationship between the timing of the preparation of the environmental analyses and the Commission's tentative planning and decision-making schedule.
- Identify any cooperating agencies and, as appropriate, allocate assignments for preparation and schedules for completing the EIS to the NRC and any cooperating agencies.
- Describe how the EIS will be prepared, including any contractor assistance to be used.

Two public scoping meetings were held at the Homestead YMCA located at 1034 Northeast 8th Street, Homestead, Florida, on July 15, 2010. The NRC announced the meeting in local and regional newspapers (*The Total Leader*, the *South Dade News Leader*, *El Nuevo Herald*, and the *Miami Herald*), issued press releases, and distributed flyers locally. Approximately 150 to 200 members of the public attended each scoping meeting session. The scoping meetings began with NRC staff members providing a brief overview of NRC's review process for COL applications and the NEPA process. In addition, a representative of the USACE discussed the USACE regulatory role and authority and permitting decisions. After the NRC's and USACE's prepared statements, the meeting was opened for public comments. Twenty-eight afternoon

scoping meeting attendees and 18 evening scoping meeting attendees provided either written statements or oral comments that were recorded and transcribed by a certified court reporter. The meeting summary was issued on August 31, 2010. The meeting summary and supporting materials, including the meeting transcripts, are available electronically through the NRC's Agencywide Documents Access and Management System (ADAMS), which is accessible from the NRC website at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room) (note that the URL is case-sensitive) under accession number ML102080607. In addition to the oral and written statements provided at the public scoping meetings, ten letters and 32 emails were received during the scoping period. A review of those documents identified eight letters and 22 emails with unique (not duplicate) comments which have been addressed in this report.

At the conclusion of the scoping period, the NRC staff and its contractor reviewed the transcripts of the scoping meetings and all written material received and identified individual comments. Comments were consolidated and categorized by topic within the proposed EIS or by the general topic if outside the scope of the EIS. Comments with similar specific objectives were combined to capture the common essential issues that had been raised in the source comments. Once comments were grouped according to subject area, the NRC staff determined the appropriate response for the comment. All comments and suggestions received orally during the scoping meeting or in writing were considered by the NRC staff.

Table 1 identifies in alphabetical order the individuals providing comments, their affiliation (if given), and the accession number that can be used to locate the correspondence in ADAMS. The Correspondence ID provided in Table 1 is used in Table 2 to identify individual comments by comment ID number and commenters by topic (category). The comment ID number consists of the 4-digit correspondence ID number (also shown in Table 1) followed by a hyphen and the number of the comment within the correspondence. The comment categories are listed in Table 3 in the order that they are presented in this document. Following Table 3 in this report are numbered sections for each comment category, which contain the comment or group of comments followed by a response.

Commenter	Affiliation (if stated)	Comment Source and ADAMS Accession #	Correspondence ID
Anonymous		Letter (ML102100532)	0011
Accursio, James	Capri Restaurant, Inc.	Meeting Transcript (ML102090730)	0003-4
Alexander, William	Latin Chamber of Commerce	Meeting Transcript (ML102150597)	0002-10
Amor, Valerie	Drawing Conclusions	Meeting Transcript (ML102150591)	0001-11
Bass, Ken		Email (ML102000006)	0005
Burris, Jessica		Email (ML102000003)	0007
Cornick, Lance	National Parks Conservation Association	Meeting Transcript (ML102150591)	0001-15
Croom, Miles	NOAA	Email (ML102320025)	0033
Daley, Dennis	Vision Council	Meeting Transcript (ML102150591)	0001-20
De Villiers, Elena	Board of Directors, Kingston Square Condominium	Letter (ML102370766)	0031
del Cid, Victor		Meeting Transcript (ML102150597)	0002-4
Diggs, Bill	Miami-Dade Chamber of Commerce	Meeting Transcript (ML102150591)	0001-17
DiNuzzo, Laura		Email (ML102310004)	0028
Eney, Douglas		Meeting Transcript (ML102150597)	0002-17
Espinosa, Carlos	Department of Environmental Resources Management	Letter (ML102370765)	0015
Fessler, Greg		Meeting Transcript (ML102150591)	0001-28
Finlan, Mary	Great Homestead/Florida City Chamber of Commerce	Meeting Transcript (ML102150597)	0002-15
Flinn, Eugene	Village of Palmetto Bay	Meeting Transcript (ML102150591)	0001-22
Garcia, Maria	Resident	Meeting Transcript (ML102150591)	0001-27
Garcia, Preston		Email (ML102000004)	0008

Table 1. Individuals Who Provided Comments During the Comment Period

Commenter	Affiliation (if stated)	Comment Source and ADAMS Accession #	Correspondence ID
Golden, James	South Florida Water Management District	Letter (ML102370759)	0032
Grosso, Richard	Everglades Law Center	Meeting Transcript (ML102150597)	0002-6
Guendelsberger, Debra		Letter (ML102300037)	0029
Gustave, Unito	Board of County Commissioners, Miami-Dade County	Meeting Transcript (ML102150591)	0001-26
Hamilton, Karen	South Florida Regional Planning Council	Email (ML102280577)	0019
Hancock, Mandy	Southern Alliance for Clean Energy	Meeting Transcript (ML102150591)	0001-14
Hancock, Mandy	Southern Alliance for Clean Energy	Meeting Transcript (ML102150597)	0002-18
Harris, Walter	South Miami Commissioner	Meeting Transcript (ML102150591)	0001-2
Harum-Alvarez, Albert	Resident	Meeting Transcript (ML102150591)	0001-24
Hogsed, Daniel		Email (ML102000002)	0009
Horton, Richard	Economic Development Council, South Miami-Dade	Meeting Transcript (ML102150591)	0001-25
Jacobs, Jeanne	Miami-Dade College Homestead	Meeting Transcript (ML102150591)	0001-4
Johnson, Barry	Greater Miami Chamber of Commerce	Meeting Transcript (ML102150591)	0001-5
Johnson, Michael	Florida Carpenter's Regional Council	Meeting Transcript (ML102150591)	0001-8
Kammerer, Laura	Florida Division of Historical Resources	Letter (ML102220345)	0013
Kauffman, Kathleen	Miami-Dade County Department of Planning and Zoning	Email (ML102290548)	0026
Kiley, Mike	Florida Power and Light Turkey Point Site	Meeting Transcript (ML102150591)	0001-3
Kiley, Mike	Florida Power and Light Turkey Point Site	Meeting Transcript (ML102150597)	0002-5

Table 1. (contd)

		Comment Source and	Correspondence
Commenter	Affiliation (if stated)	ADAMS Accession #	ID
Kimball, Dan	National Park Service	Email (ML102290549)	0025
Kipnis, Daniel	Florida Billfish The Green Gallon Inc. Miami-Dade County Climate Change Advisory Task Force Biscayne Bay Restoration Review Coordination Team City of Miami Beach Marine Authority	Email (ML102320036)	0034
LaFerrier, Marc	Miami-Dade County Department of Planning and Zoning	Email (ML102290222)	0023
Landeta, Hector	Value Place Hotel Homestead	Meeting Transcript (ML102150591)	0001-18
Lee, Nancy	Urban Environment League	Email (ML102070008)	0010
Lee, Nancy	Urban Environment League	Meeting Transcript (ML102150591)	0001-12
Lerner, Cindy	Village of Pinecrest	Meeting Transcript (ML102150591)	0001-21
Lewis, Mark	National Park Service	Email (ML102290549)	0025
MacLaren, Kaitlin	Tropical Audubon Society	Meeting Transcript (ML102150591)	0001-7
Marinelli, Francis J.	Resident	Meeting Transcript (ML102150591)	0001-10
Martinelli, Tom	Clean and Safe Energy Coalition	Meeting Transcript (ML102150591)	0001-9
Martinelli, Tom	Clean and Safe Energy Coalition	Meeting Transcript (ML102150597)	0002-9
McHugh, John	Resident	Meeting Transcript (ML102150597)	0002-12
Meerbott, Tim	Cutler Bay City Councilman	Meeting Transcript (ML102150597)	0002-2
Miller, Lloyd		Meeting Transcript (ML102150591)	0001-6
Moses, Dorothy	Resident	Email (ML102300015)	0027
Mueller, Heinz	EPA	Letter (ML102250207)	0014
Mulkey, Cindy	Florida Department of Environmental Protection	Email (ML102280580)	0020

Table 1. (contd)

Commenter	Affiliation (if stated)	Comment Source and ADAMS Accession #	Correspondence ID
O'Katy, Jessica	Students for Environmental Action at Florida International University Florida Youth Environmental Sustainability Coalition	Meeting Transcript (ML102150597)	0002-8
Payne, Nkenga	City of South Miami	Letter (ML102160400)	0012
Poole, Mary Ann	Florida Fish and Wildlife Conservation Commission	Email (ML102280488)	0018
Reynolds, Laura	Tropical Audubon Society	Email (ML102290221)	0022
Roff, Rhonda	Save It Now Glades	Meeting Transcript (ML102150597)	0002-11
Ryan, Megan	Intellectual Decisions on Environmental Awareness Solutions	Meeting Transcript (ML102150591)	0001-19
Schwartz, Matthew	Broward Group of the Sierra Club	Meeting Transcript (ML102150597)	0002-14
Shlackman, Mara	Resident	Meeting Transcript (ML102150597)	0002-16
Showen, Steve	Citizens Alliance for Safe Energy	Meeting Transcript (ML102150591)	0001-16
Simpson, Roce	South Florida Building and Construction Trades and International Brotherhood of Electrical Workers,	Meeting Transcript (ML102150597)	0002-13
Singer, Craig		Email (ML102000005)	0004
Smilan, Stan		Meeting Transcript (ML102150591)	0001-13
Snelson, Richard	Iron Workers Local 272	Meeting Transcript (ML102150597)	0002-7
Sorenson, Katy	Miami-Dade County Commissioner, District 8	Meeting Transcript (ML102150597)	0002-1
Troner, Susannah		Email (ML102280487)	0017
Vrooman, Paul	Cutler Bay	Meeting Transcript (ML102150591)	0001-23
Walker, Tom	Florida Keys Aqueduct Authority	Email (ML102290224)	0024
Walker, Tom	Florida Keys Aqueduct Authority	Meeting Transcript (ML102150597)	0002-3

Table 1. (contd)

Table 1. (contd)
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Commenter	Affiliation (if stated)	Comment Source and ADAMS Accession #	Correspondence ID
Wallace, Otis	Florida City	Meeting Transcript (ML102150591)	0001-1
Weins, Brian		Email (ML102000007)	0006
White, Barry	Citizens Allied for Safe Energy, Inc.	Email (ML102280490)	0016
White, Barry	Citizens Allied for Safe Energy, Inc.	Meeting Transcript (ML102090730)	0003-2
Wilansky, Laura		Email (ML102290220)	0021

Table 2.	Comment Categories	with Associated	Commenters and	d Comment ID Numbers

Comment Category	Commenter (Comment ID)
Accidents-Severe	 Hancock, Mandy (0001-14-9)
Alternatives-Energy	 Amor, Valerie (0001-11-7) (0001-11-8) (0001-11-11) Burris, Jessica (0007-7) De Villiers, Elena (0031-6) DiNuzzo, Laura (0028-3) (0028-4) (0028-6) Finlan, Mary (0002-15-4) Guendelsberger, Debra (0029-2) Hancock, Mandy (0001-14-3) (0001-14-4) (0001-14-7) (0002-18-3) Harum-Alvarez, Albert (0001-24-4) Hogsed, Daniel (0009-2) (0009-4) Kiley, Mike (0001-3-3) Lerner, Cindy (0001-21-5) Mueller, Heinz (0014-16) O'Katy, Jessica (0002-8-3) (0002-8-9) Payne, Nkenga (0012-2) (0012-15) (0012-18) Ryan, Megan (0001-19-4) Schwartz, Matthew (0002-16-4) Shlackman, Mara (0002-16-4) Showen, Steve (0001-13-8) Sorenson, Katy (0001-13-8) Sorenson, Katy (0001-3) (0017-5) Weins, Brian (0006-4) White, Barry (0016-12)

Comment Category	Commenter (Comment ID)
Alternatives-Sites	 Cornick, Lance (0001-15-1) Kimball, Dan (0025-1-6) (0025-1-7) (0025-1-8) (0025-1-9) (0025-1-10) Lerner, Cindy (0001-21-6) Lewis, Mark (0025-1-6) (0025-1-7) (0025-1-8) (0025-1-9) (0025-1-10) Meerbott, Tim (0002-2-1) Miller, Lloyd (0001-6-9) Moses, Dorothy (0027-2) Ryan, Megan (0001-19-3) Sorenson, Katy (0002-1-1)
Alternatives-System Design	 Kimball, Dan (0025-2-12) (0025-3-22) (0025-3-47) LaFerrier, Marc (0023-1-25) (0023-1-49) (0023-2-7) (0023-3-48) Lewis, Mark (0025-2-12) (0025-3-22) (0025-3-47) Poole, Mary Ann (0018-9) (0018-14)
Benefit-Cost Balance	 De Villiers, Elena (0031-4) Grosso, Richard (0002-6-8) Hamilton, Karen (0019-8) (0019-11) Hancock, Mandy (0001-14-2) Harum-Alvarez, Albert (0001-24-1) (0001-24-3) Payne, Nkenga (0012-14) Reynolds, Laura (0022-2-10) (0022-3-16) Ryan, Megan (0001-19-5) Showen, Steve (0001-16-5) (0001-16-6) Singer, Craig (0004-2) Troner, Susannah (0017-1) White, Barry (0003-2-2) (0016-7) Wilansky, Laura (0021-15) (0021-18)
Cumulative Impacts	 Espinosa, Carlos (0015-5) Golden, James (0032-28) Hamilton, Karen (0019-3) Harris, Walter (0001-2-3) Kimball, Dan (0025-1-12) (0025-1-15) (0025-2-13) Kipnis, Daniel (0034-1) (0034-2) (0034-3) (0034-4) (0034-5) LaFerrier, Marc (0023-1-10) Lerner, Cindy (0001-21-3) Lewis, Mark (0025-1-12) (0025-1-15) (0025-2-13) MacLaren, Kaitlin (0001-7-1) (0001-7-2) (0001-7-4) (0001-7-8) (0001-7-9) Miller, Lloyd (0001-6-5) Mueller, Heinz (0014-7) (0014-14) Payne, Nkenga (0012-6) (0012-9) Reynolds, Laura (0022-1-9) (0022-2-17) (0022-4-17) Shlackman, Mara (0002-16-1) (0002-16-2) Sorenson, Katy (0002-1-2) White, Barry (0016-5) (0016-6) (0016-14) Wilansky, Laura (0021-4)

Table 2. (contd)

Comment Category	Commenter (Comment ID)
Decommissioning	Reynolds, Laura (0022-4-14)
•	Wilansky, Laura (0021-6)
Ecology-Aquatic	Amor, Valerie (0001-11-10)
•	Croom, Miles (0033-1) (0033-2) (0033-3) (0033-4) (0033-7) (0033-9)
	(0033-10)
•	Golden, James (0032-9)
	Grosso, Richard (0002-6-7) Kimball, Dan (0025, 1, 11) (0025, 1, 14) (0025, 2, 17) (0025, 2, 18) (0025, 2, 10)
•	Kiinball, Dali (0025-1-11) (0025-1-14) (0025-3-17) (0025-3-16) (0025-3-19) (0025-3-29) (0025-3-30)
	a Ferrier Marc (0023-1-18) (0023-1-36) (0023-1-64) (0023-2-14)
	(0023-2-15)
•	Lewis, Mark (0025-1-11) (0025-1-14) (0025-3-17) (0025-3-18) (0025-3-19)
	(0025-3-29) (0025-3-30)
•	Mulkey, Cindy (0020-2)
•	Poole, Mary Ann (0018-2) (0018-4) (0018-6) (0018-8) (0018-10)
•	Reynolds, Laura (0022-2-6) (0022-2-7) (0022-3-1) (0022-3-18) (0022-3-21)
Ecology-Terrestrial	Amor, Valerie (0001-11-3)
•	Burris, Jessica (0007-1) (0007-3)
•	Croom, Miles (0033-11)
	Espinosa, Canos (0015-3) (0015-4) Carola, Braatan (0008-2)
	Galden lames $(0032-12)$ $(0032-14) (0032-16) (0032-17) (0032-19)$
	(0032-25) (0032-27) (0032-35) (0032-36)
	Grosso, Richard (0002-6-5)
•	Kimball, Dan (0025-2-6) (0025-2-11) (0025-2-18) (0025-3-31) (0025-3-32)
	(0025-3-33) (0025-3-34) (0025-3-43)
•	LaFerrier, Marc (0023-1-17) (0023-1-19) (0023-1-22) (0023-1-46)
	(0023-1-50) (0023-1-62) (0023-1-63) (0023-1-71) (0023-2-5) (0023-2-8)
	(0023-2-9) (0023-2-10) (0023-2-11) (0023-2-12) (0023-2-13) (0023-2-16) (0023-2-17) (0023-2-20)
	(0023-2-17) (0023-2-30) (0023-2-31) (0023-2-32) (0023-3-10) (0023-3-22) (0023-3-23) (0023-3-24) (0023-3-25) (0023-3-51) (0023-3-53) (0023-3-69)
	(0023-4-5) (0023-4-9) (0023-4-14) (0023-4-15) (0023-4-16) (0023-4-18)
	(0023-4-20)
•	Lewis, Mark (0025-2-6) (0025-2-11) (0025-2-18) (0025-3-31) (0025-3-32)
	(0025-3-33) (0025-3-34) (0025-3-43)
•	MacLaren, Kaitlin (0001-7-3)
•	Miller, Lloyd (0001-6-4)
	Mueller, Heinz (0014-10) (0014-15) (0014-17) (0014-18)
	rayiic, inneliya (0012-7) Poole Mary Ann (0018-3) (0018-5) (0018-16)
	Revnolds Laura ($0022-1-16$) ($0022-1-17$) ($0022-1-19$) ($0022-2-3$) ($0022-2-21$)
	Schwartz, Matthew (0002-14-10)
	Simpson, Roce (0002-13-7)
Geology	Reynolds, Laura (0022-1-14)

Table 2. (contd)

Comment Category	Commenter (Comment ID)
Health- NonRadiological	 Burris, Jessica (0007-4) De Villiers, Elena (0031-3) Hamilton, Karen (0019-6) Kimball, Dan (0025-3-28) LaFerrier, Marc (0023-1-11) (0023-3-35) Lewis, Mark (0025-3-28) O'Katy, Jessica (0002-8-6) Reynolds, Laura (0022-1-15) (0022-1-18) (0022-1-20) (0022-2-2) Schwartz, Matthew (0002-14-7) White, Barry (0003-2-1) (0016-3)
Health-Radiological	 , Anonymous (0011-1) Burris, Jessica (0007-5) O'Katy, Jessica (0002-8-8) Payne, Nkenga (0012-8) Reynolds, Laura (0022-4-8) (0022-4-10) (0022-4-11) (0022-4-12) (0022-4-15) Showen, Steve (0001-16-3) (0001-16-4) Smilan, Stan (0001-13-6) Walker, Tom (0002-3-7) (0024-4) Wilansky, Laura (0021-9) (0021-14) (0021-19)
Historic and Cultural Resources	 Kammerer, Laura (0013-1) Kauffman, Kathleen (0026-1) (0026-2) Kimball, Dan (0025-3-41) LaFerrier, Marc (0023-2-1) (0023-3-32) (0023-3-33) Lewis, Mark (0025-3-41)
Hydrology- Groundwater	 Croom, Miles (0033-5) (0033-6) (0033-8) De Villiers, Elena (0031-7) DiNuzzo, Laura (0028-2) Espinosa, Carlos (0015-2) Golden, James (0032-7) (0032-8) (0032-11) (0032-29) (0032-30) (0032-31) (0032-32) Grosso, Richard (0002-6-9) Kimball, Dan (0025-1-4) (0025-1-5) (0025-1-13) (0025-2-1) (0025-3-1) (0025-3-2) (0025-3-3) (0025-3-4) (0025-3-5) (0025-3-6) (0025-3-7) (0025-3-8) (0025-3-9) (0025-3-10) (0025-3-11) (0025-3-12) (0025-3-13) (0025-3-14) (0025-3-16) (0025-3-11) (0025-3-12) (0023-1-31) (0023-1-31) (0023-1-32) (0023-1-33) (0023-1-34) (0023-1-35) (0023-1-37) (0023-1-38) (0023-1-39) (0023-1-40) (0023-1-41) (0023-1-42) (0023-1-37) (0023-1-38) (0023-1-39) (0023-1-68) (0023-1-70) (0023-3-38) (0023-3-40) (0023-3-47) (0023-4-10) Lerner, Cindy (0001-21-2) Lewis, Mark (0025-1-4) (0025-1-5) (0025-3-5) (0025-3-6) (0025-3-7) (0025-3-2) (0025-3-3) (0025-3-4) (0025-3-6) (0025-3-7)

Table 2. (contd)

Comment Category	Commenter (Comment ID)
Comment Category	Commenter (Comment ID) (0025-3-8) (0025-3-9) (0025-3-10) (0025-3-11) (0025-3-12) (0025-3-13) (0025-3-14) (0025-3-16) (0025-3-21) MacLaren, Kaitlin (0001-7-10) McHugh, John (0002-12-1) (0002-12-6) (0002-12-9) (0002-12-10) Miller, Lloyd (0001-6-3) (0001-6-6) Moses, Dorothy (0027-6) (0027-7) Mueller, Heinz (0014-5) (0014-6) Mulkey, Cindy (0020-1) O'Katy, Jessica (0002-8-4) Poole, Mary Ann (0018-1) Reynolds, Laura (0022-1-1) (0022-1-21) (0022-2-8) (0022-2-9) (0022-2-13) (0022-2-20) (0022-3-2) (0022-3-3) (0022-3-8) (0022-3-9) (0022-4-6) (0022-4-7) Walker, Tom (0002-3-1) (0002-3-2) (0002-3-3) (0002-3-5) (0024-1) (0024-2 (0024-3) (0024-5) (0024-6) White, Barry (0016-8) Burris, Jessica (0007-6) Cornick, Lance (0001-15-2) (0001-15-3) Coroom, Miles (0033-12) (0033-13) Eney, Douglas (0002-17-6) Espinosa, Carlos (0015-6) Golden, James (0032-2) (0032-3) (0032-4) (0032-5) (0032-6) (0032-10) (0032-13) (0032-22) (0032-34) Grosso, Richard (0002-6-1) (0002-6-2) Hancock, Mandy (0001-14-6) Kimball, Dan (0025-2-4) (0025-2-15) (0025-2-17) (0025-3-15) (0025-3-35) (0025-3-36) (0023-3-27) (0023-3-39) (0023-3-43) (0023-3-26) (0023-3-60) (0023-3-27) (0023-3-39) (0023-3-43) (0023-3-59) (0023-3-60) (0023-4-1) (0025-3-35) (0025-3
	 (0023-4-11) Lewis, Mark (0025-2-4) (0025-2-15) (0025-2-17) (0025-3-15) (0025-3-35) (0025-3-36) McHugh, John (0002-12-4) Meerbott, Tim (0002-2-3) Moses, Dorothy (0027-5) (0027-5)
	 O'Katy, Jessica (0002-8-5) Payne, Nkenga (0012-10) Poole, Mary Ann (0018-7) (0018-11) (0018-12) Reynolds, Laura (0022-1-4) (0022-1-8) (0022-2-19) Ryan, Megan (0001-19-2) Schwartz, Matthew (0002-14-14) Walker, Tom (0002-3-4) (0002-3-6)

Table 2. (contd)

Comment Category	Commenter (Comment ID)
Land Use-Site and Vicinity	 Burris, Jessica (0007-2) Golden, James (0032-21) (0032-24) (0032-33) (0032-37) (0032-38) Gustave, Unito (0001-26-3) Hamilton, Karen (0019-4) (0019-12) (0019-13) Kimball, Dan (0025-3-27) LaFerrier, Marc (0023-1-30) (0023-3-2) (0023-3-54) Lewis, Mark (0025-3-27) Miller, Lloyd (0001-6-7) Moses, Dorothy (0027-3) Mueller, Heinz (0014-12)
Land Use- Transmission Lines	 Cornick, Lance (0001-15-4) De Villiers, Elena (0031-2) Flinn, Eugene (0001-22-1) (0001-22-2) (0001-22-3) (0001-22-4) Garcia, Preston (0008-3) Golden, James (0032-22) Hamilton, Karen (0019-5) (0019-7) (0019-9) (0019-10) Harum-Alvarez, Albert (0001-24-6) Horton, Richard (0001-25-5) Kimball, Dan (0025-2-5) (0025-2-7) (0025-2-8) (0025-2-9) (0025-2-10) (0025-3-37) (0025-3-37) LaFerrier, Marc (0023-3-19) (0023-3-20) (0023-3-31) (0023-3-37) (0023-3-52) (0023-3-62) (0023-3-63) Lerner, Cindy (0001-21-1) (0001-21-4) Lewis, Mark (0025-2-5) (0025-2-7) (0025-2-8) (0025-2-9) (0025-2-10) (0025-3-37) MacLaren, Kaitlin (0001-7-5) Meerbott, Tim (0002-2-2) Miller, Lloyd (0001-6-8) Reynolds, Laura (0022-1-6) (0022-1-7) (0022-4-5) Schwartz, Matthew (0002-14-9) Sorenson, Katy (0002-15) Vrooman, Paul (0001-23-1) (0001-23-2) (0001-23-3)
Meteorology and Air Quality	 Kimball, Dan (0025-2-3) (0025-3-25) (0025-3-45) LaFerrier, Marc (0023-1-16) (0023-1-26) (0023-1-28) (0023-3-16) (0023-4-7) (0023-4-8) Lewis, Mark (0025-2-3) (0025-3-25) (0025-3-45) MacLaren, Kaitlin (0001-7-7) Mueller, Heinz (0014-21) Reynolds, Laura (0022-2-1) (0022-2-16) (0022-2-18) (0022-4-2) (0022-4-3) (0022-4-4) White, Barry (0016-2) Wilansky, Laura (0021-11)

Table 2. (contd)

Comment Category	Commenter (Comment ID)
Need for Power	 Eney, Douglas (0002-17-2) Hancock, Mandy (0001-14-5) Horton, Richard (0001-25-2) Johnson, Barry (0001-5-2) Martinelli, Tom (0001-9-3) O'Katy, Jessica (0002-8-1) Reynolds, Laura (0022-1-5) (0022-3-4) (0022-3-5) (0022-3-6) (0022-4-24) Schwartz, Matthew (0002-14-1) (0002-14-2) Snelson, Richard (0002-7-2) Weins, Brian (0006-5) Wilapaky, Laura (0021-2)
Nonradiological Waste	 LaFerrier, Marc (0023-1-8) (0023-1-60)
Opposition- Licensing Action	 Amor, Valerie (0001-11-2) (0001-11-9) De Villiers, Elena (0031-1) Guendelsberger, Debra (0029-1) Harris, Walter (0001-2-1) Kipnis, Daniel (0034-6) Miller, Lloyd (0001-6-11) Moses, Dorothy (0027-1) (0027-4) (0027-9) Ryan, Megan (0001-19-1) (0001-19-11) Schwartz, Matthew (0002-14-12) Troner, Susannah (0017-4) White, Barry (0016-1) (0016-13) Wilansky, Laura (0021-1) (0021-17)
Opposition-Nuclear Power	 Amor, Valerie (0001-11-1) De Villiers, Elena (0031-5) DiNuzzo, Laura (0028-1) Hancock, Mandy (0001-14-13) (0002-18-1) Hogsed, Daniel (0009-1) (0009-3) Payne, Nkenga (0012-1) Ryan, Megan (0001-19-6) (0001-19-9) Showen, Steve (0001-16-2) (0001-16-9) Troner, Susannah (0017-2) White, Barry (0003-2-3) Wilansky, Laura (0021-7) (0021-13)
Opposition-Plant	 Hancock, Mandy (0001-14-1) (0002-18-2) Miller, Lloyd (0001-6-1) Payne, Nkenga (0012-16) (0012-17) Wilansky, Laura (0021-8)
Outside Scope- Emergency	 Hancock, Mandy (0001-14-11) Harris, Walter (0001-2-5) Kimball, Dan (0025-2-2)

Table 2. (contd)

Comment Category	Commenter (Comment ID)
Preparedness	 Lewis, Mark (0025-2-2) Moses, Dorothy (0027-8) Payne, Nkenga (0012-11) Reynolds, Laura (0022-3-15) (0022-3-19) (0022-4-9) (0022-4-18) (0022-4-19) (0022-4-20) (0022-4-21) (0022-4-22) (0022-4-23) Roff, Rhonda (0002-11-7) White, Barry (0016-4) Wilansky, Laura (0021-2)
Outside Scope- Miscellaneous	 Eney, Douglas (0002-17-5) Harum-Alvarez, Albert (0001-24-2) LaFerrier, Marc (0023-1-5) (0023-1-6) (0023-1-45) (0023-1-57) (0023-1-58) (0023-3-49) (0023-3-55) (0023-3-56) (0023-3-58) (0023-3-61) (0023-3-68) (0023-4-4) (0023-4-17) Miller, Lloyd (0001-6-2) Mueller, Heinz (0014-9) Reynolds, Laura (0022-1-10) (0022-1-11) (0022-1-12) Roff, Rhonda (0002-11-2) (0002-11-3) (0002-11-5) Schwartz, Matthew (0002-14-5) (0002-14-6) Showen, Steve (0001-16-7) Sorenson, Katy (0002-1-3) Walker, Tom (0024-7) White, Barry (0016-10) Wilansky, Laura (0021-5)
Outside Scope-NRC Oversight	 Eney, Douglas (0002-17-4) Garcia, Maria (0001-27-2) Roff, Rhonda (0002-11-4) (0002-11-6)
Outside Scope- Safety	 Amor, Valerie (0001-11-6) Grosso, Richard (0002-6-6) Hancock, Mandy (0001-14-10) (0001-14-12) Harris, Walter (0001-2-2) Kiley, Mike (0001-3-2) Kimball, Dan (0025-3-23) LaFerrier, Marc (0023-1-12) Lewis, Mark (0025-3-23) Mueller, Heinz (0014-11) (0014-13) (0014-19) Payne, Nkenga (0012-3) (0012-4) (0012-5) (0012-12) Reynolds, Laura (0022-1-2) (0022-1-3) Roff, Rhonda (0002-11-1) (0002-11-8) Schwartz, Matthew (0002-14-11) Showen, Steve (0001-16-1) Wilansky, Laura (0021-16)
Outside Scope- Security and Terrorism	 Lee, Nancy (0010-1) Smilan, Stan (0001-13-1) (0001-13-2) (0001-13-3) (0001-13-4) (0001-13-5) (0001-13-7) (0001-13-9) (0001-13-10)

Table 2. (contd)

Comment Category	Commenter (Comment ID)
Process-ESP-COL	 Kimball, Dan (0025-1-2) (0025-3-20) LaFerrier, Marc (0023-1-59) (0023-3-42) (0023-3-50) (0023-3-64) (0023-3-66) (0023-4-21) Lee, Nancy (0001-12-1) Lewis, Mark (0025-1-2) (0025-3-20) Miller, Lloyd (0001-6-10) Mueller, Heinz (0014-3) (0014-4) Ryan, Megan (0001-19-10) Singer, Craig (0004-3)
Process-NEPA	 Kimball, Dan (0025-2-19) Lewis, Mark (0025-2-19)
Related Federal Projects	 Golden, James (0032-1) (0032-15) (0032-18) (0032-20) Grosso, Richard (0002-6-4) Kimball, Dan (0025-1-1) (0025-2-14) (0025-2-16) (0025-3-42) (0025-3-44) LaFerrier, Marc (0023-1-51) (0023-3-3) (0023-3-7) (0023-3-8) (0023-3-9) (0023-3-10) (0023-3-11) (0023-3-12) (0023-3-15) (0023-3-17) (0023-3-21) (0023-3-28) (0023-3-45) (0023-3-46) Lewis, Mark (0025-1-1) (0025-2-14) (0025-2-16) (0025-3-42) (0025-3-44) MacLaren, Kaitlin (0001-7-6) Reynolds, Laura (0022-1-13)
Site Layout and Design	 Amor, Valerie (0001-11-4) Kimball, Dan (0025-1-3) (0025-3-24) (0025-3-26) LaFerrier, Marc (0023-1-20) (0023-1-21) (0023-1-23) (0023-1-24) (0023-1-27) (0023-1-43) (0023-1-52) (0023-1-54) (0023-1-55) (0023-1-56) (0023-1-61) (0023-1-65) (0023-2-6) (0023-2-6) (0023-2-18) (0023-2-19) (0023-2-21) (0023-2-22) (0023-2-33) (0023-2-34) (0023-2-35) (0023-2-36) (0023-2-37) (0023-2-38) (0023-2-39) (0023-2-40) (0023-2-35) (0023-3-4) (0023-3-5) (0023-3-6) (0023-3-65) (0023-3-67) (0023-3-30) (0023-3-41) (0023-3-44) (0023-3-57) (0023-3-65) (0023-3-67) (0023-4-2) (0023-4-3) (0023-4-6) (0023-4-12) (0023-4-13) (0023-4-19) Lewis, Mark (0025-1-3) (0025-3-24) (0025-3-26) Mueller, Heinz (0014-8) (0014-20) Poole, Mary Ann (0018-13) (0018-15) Reynolds, Laura (0022-2-4) (0022-2-5) (0022-2-11) (0022-2-12) (0022-2-14) (0022-2-15) (0022-3-7) (0022-3-10) (0022-3-11) (0022-3-12) (0022-3-13) (0022-3-14) (0022-3-17) (0022-3-20) (0022-4-1)
Socioeconomics	 Accursio, James (0003-4-4) (0003-4-5) Alexander, William (0002-10-1) (0002-10-3) (0002-10-4) Daley, Dennis (0001-20-5) Diggs, Bill (0001-17-1) (0001-17-2) Grosso, Richard (0002-6-3) Hamilton, Karen (0019-1) (0019-2) Harum-Alvarez, Albert (0001-24-5) Jacobs, Jeanne (0001-4-2)

Table 2. (contd)

Comment Category	Commenter (Comment ID)
	 Johnson, Barry (0001-5-3) (0001-5-4) Johnson, Michael (0001-8-3) Kiley, Mike (0001-3-1) (0002-5-4) Kimball, Dan (0025-3-38) (0025-3-39) (0025-3-40) (0025-3-46) LaFerrier, Marc (0023-1-53) (0023-2-2) (0023-2-3) (0023-2-4) (0023-2-23) (0023-2-24) (0023-2-25) (0023-2-26) (0023-2-27) (0023-2-28) (0023-2-29) (0023-3-1) (0023-3-34) (0023-3-36) Landeta, Hector (0001-18-2) (0001-18-3) (0001-18-5) Lerner, Cindy (0001-21-7) Lewis, Mark (0025-3-38) (0025-3-39) (0025-3-40) (0025-3-46) Marinelli, Francis J. (0001-10-2) Martinelli, Tom (0001-9-2) (0002-9-3) McHugh, John (0002-12-5) Reynolds, Laura (0022-4-16) Ryan, Megan (0001-19-7) (0001-19-8) Schwartz, Matthew (0002-14-4) Shlackman, Mara (0002-16-3) Simpson, Roce (0002-13-3) (0002-13-4) (0002-13-5) Snelson, Richard (0002-7-3) (0002-7-4) Wallace, Otis (0001-15)
Support-Licensing Action	 Accursio, James (0003-4-6) Alexander, William (0002-10-5) Daley, Dennis (0001-20-3) del Cid, Victor (0002-4-3) Diggs, Bill (0001-17-3) Fessler, Greg (0001-28-2) Finlan, Mary (0002-15-2) Garcia, Maria (0001-27-1) Garcia, Preston (0008-1) Gustave, Unito (0001-26-1) (0001-26-5) Horton, Richard (0001-25-1) Johnson, Barry (0001-5-5) Johnson, Michael (0001-8-1) Landeta, Hector (0001-18-1) (0001-18-6) Martinelli, Tom (0001-9-4) (0002-9-4) McHugh, John (0002-12-11) Simpson, Roce (0002-13-8) Singer, Craig (0004-4) Wallace Otis (0001-11) (0001-16)
Support-Licensing Process	 Espinosa, Carlos (0015-1) Hamilton, Karen (0019-14) Johnson, Barry (0001-5-1) Mueller, Heinz (0014-1) (0014-2)

Table 2. (contd)

Comment Category	Commenter (Comment ID)
Support-Nuclear	• Accursio, James (0003-4-1) (0003-4-3)
Power	• Bass, Ken (0005-1)
	 Eney, Douglas (0002-17-1) (0002-17-3)
	• Finlan, Mary (0002-15-3) (0002-15-5)
	• Gustave, Unito (0001-26-2)
	• Horton, Richard (0001-25-3)
	• Kiley, Mike (0002-5-2) (0002-5-3)
	• Landeta, Hector (0001-18-4)
	• Martinelli, Tom (0001-9-1) (0002-9-1) (0002-9-2)
	• Simpson, Roce (0002-13-6)
	• Singer, Craig (0004-1)
	• Snelson, Richard (0002-7-1)
	• Wallace. Otis (0001-1-4)
	• Weins, Brian (0006-1) (0006-3)
Support-Plant	Accurcio lames (0003.4.2)
	 Accursio, James (0003-4-2) Alexander, William (0002-10-2)
	• Riexander, William (0002-10-2) • Daloy, Doppie (0001-20-1) (0001-20-2) (0001-20-4)
	• Daley, Definits $(0007-20-7)(0007-20-2)(0007-20-4)$
	• def Ciu, Viciol (0002-4-1) (0002-4-2) • Eagler Crog (0001-28-1)
	• Fessler, Grey (0001-20-1) • Finler, Mary (0002-15-1)
	 Filiall, Mary (0002-13-1) Custova Unita (0001.26.4) (0001.26.6)
	 Gustave, Unito (0001-20-4) (0001-20-0) Horton Dichard (0001-25-4)
	• Holton, Richald (0001-23-4) • Jacoba Jacoba (0001 4 1)
	• Jacobs, Jeanne (0001-4-1)
	• 501115011 , Michael (0001-0-2) • Kilov, Miko (0001-2-4) (0002-5-1) (0002-5-5)
	• Kiley, Mike $(0001-3-4)(0002-3-1)(0002-3-5)$ • MoHugh John $(0002, 12, 2)(0002, 12, 2)$
	• Michugii, John (0002-12-2) (0002-12-3)
	• Simpson, Roce (0002-13-1) (0002-13-2)
	• wallace, Olis (0001-1-2)
Uranium Fuel Cycle	• Amor, Valerie (0001-11-5)
	 Bass, Ken (0005-2)
	 DiNuzzo, Laura (0028-5)
	 Guendelsberger, Debra (0029-3)
	 Hancock, Mandy (0001-14-8)
	Harris, Walter (0001-2-4)
	Marinelli, Francis J. (0001-10-1)
	 O'Katy, Jessica (0002-8-2) (0002-8-7)
	Payne, Nkenga (0012-13)
	Reynolds, Laura (0022-4-13)
	 Schwartz, Matthew (0002-14-8) (0002-14-13)
	Shlackman, Mara (0002-16-5)
	Weins, Brian (0006-2)
	• Wilansky, Laura (0021-10) (0021-21)

Table 2. (contd)

Table 3. Comment Categories in the Order in Which They Are Presented in this Report

- 1. Comments Concerning Process COL
- 2. Comments Concerning Process NEPA
- 3. Comments Concerning Site Layout and Design
- 4. Comments Concerning Land Use Site and Vicinity
- 5. Comments Concerning Land Use Transmission Lines
- 6. Comments Concerning Geology
- 7. Comments Concerning Hydrology Surface Water
- 8. Comments Concerning Hydrology Groundwater
- 9. Comments Concerning Ecology Terrestrial
- 10. Comments Concerning Ecology Aquatic
- 11. Comments Concerning Socioeconomics
- 12. Comments Concerning Historic and Cultural Resources
- 13. Comments Concerning Meteorology and Air Quality
- 14. Comments Concerning Health Nonradiological
- 15. Comments Concerning Health Radiological
- 16. Comments Concerning Nonradiological Waste
- 17. Comments Concerning Accidents Severe
- 18. Comments Concerning the Uranium Fuel Cycle
- 19. Comments Concerning Decommissioning
- 20. Comments Concerning Related Federal Projects
- 21. Comments Concerning Cumulative Impacts
- 22. Comments Concerning the Need for Power
- 23. Comments Concerning Alternatives Energy
- 24. Comments Concerning Alternatives System Design
- 25. Comments Concerning Alternatives Sites
- 26. Comments Concerning Benefit-Cost Balance
- 27. General Comments in Support of the Licensing Action
- 28. General Comments in Support of the Licensing Process
- 29. General Comments in Support of Nuclear Power
- 30. General Comments in Support of the Existing Plant or the Applicant
- 31. General Comments in Opposition to the Licensing Action
- 32. General Comments in Opposition to Nuclear Power
- 33. General Comments in Opposition to the Existing Plant or the Applicant
- 34. Comments Concerning Issues Outside Scope Emergency Preparedness
- 35. Comments Concerning Issues Outside Scope Miscellaneous
- 36. Comments Concerning Issues Outside Scope NRC Oversight
- 37. Comments Concerning Issues Outside Scope Safety
- 38. Comments Concerning Issues Outside Scope Security and Terrorism

Turkey Point Units 6 and 7 Combined Licenses Public Scoping Comments and Responses

The comments and suggestions received as part of the scoping process are summarized and discussed below. Parenthetical numbers after each comment refer to the comment ID number (document number-comment number). Comments are grouped by category.

The draft EIS will take into account the relevant issues raised during the scoping process, and will be made available for public comment.

The comment period for the draft EIS will offer the next opportunity for the applicant; interested Federal, Tribal, State, and local government agencies; local organizations; and members of the public to provide input to the NRC's environmental review process. The comments received on the draft EIS will be considered in the preparation of the final EIS. The final EIS, along with the staff's Safety Evaluation Report, will be considered in the NRC's decision on FPL's COL application for the Turkey Point site.

1. Comments Concerning Process – COL

Comment: Having these meetings out in one corner of the County is not fair to the rest of the County because this affects the entire County. All our commissioners vote on this and yet, you'll have it in one commission district. It's all our Bay. The water which you are going to bring in to cool the plants is all our water. The power lines are going throughout all our neighborhoods. This is not just a Homestead issue; it's not a local issue; it's a Countywide issue. And I would say it's a regional issue because I think Monroe County should be part of the plan, too. I think there should be meetings held all over the County. The scoping meeting out to Homestead, I had to drive an hour-and-a-half to get here and I'm just on the other side of the County. So the Urban Environment League calls for scoping meetings throughout the County because this empty room should tell you something. (0001-12-1 [Lee, Nancy])

Response: Public meetings are generally held in the community located geographically closest to the proposed project location. Interested parties that are unable to attend the public meetings in person are also afforded the opportunity to submit written comments. This comment expresses opposition to the NRC's scoping process, but provides no specific information on the NRC's environmental review of the Turkey Point Units 6 and 7 COL application. Therefore, this comment will not be addressed in the environmental impact statement (EIS).

Comment: I just want to make is that I that I think we should be evaluating environmental impacts and safety on the same plane and not rank safety above environmental. Because if

you neglect the environmental impacts of building these reactors, you are putting the safety of my generation and the future generation at risk. (**0001-19-10** [Ryan, Megan])

Comment: I have little faith in what might happen here. As you have heard, they have never and can't find any instance in which they have refused a nuclear power plant. They've always managed to find ways to accommodate it. (0001-6-10 [Miller, Lloyd])

Response: The NRC takes seriously its responsibility under the Atomic Energy Act to protect the health and safety of the public and the environment in regulating the U.S. nuclear power industry. More information about NRC's roles and responsibilities is available on the NRC's website at <u>http://www.nrc.gov/about-nrc.html</u>. NRC approval of an application for a COL is not a foregone conclusion. Environmental issues, as well as safety issues, will be evaluated before a decision on an application is reached. As described in the regulations, the NRC can deny an application based on the finding of its review.

Comment: In my opinion there should be one universal standard design, agreed upon by a panel of experts, and built to exacting standards so it becomes cheaper and less time consuming. (**0004-3** [Singer, Craig])

Response: This comment did not provide information related to the environmental effects of the proposed action and will not be addressed in the EIS.

Comment: The Draft EIS should discuss the status and any issues/concerns associated with the following approvals: Approval of the application to the NRC for a COL; Approval of the application to the State of Florida for site certification; Approval of any required National Pollutant Discharge Elimination Permit(s) (NPDES) for water discharge; Approval of the Prevention of Significant Deterioration (PSD) air permit; Approval of a 316(b) demonstration for the proposed cooling water intake; Approval of the U.S. Army Corps of Engineers (USACE) Section 404 and Section 10 permits to construct structures in wetlands and regulated waterways; Approval of hazardous waste management and disposal plans; Approval of the "determination of consistency" under the requirements of the Coastal Zone Management Act to ensure the expanded plant is consistent with existing federal and state coastal zone management plans. (0014-4 [Mueller, Heinz])

Comment: Four (4) sixty thousand gallon above ground diesel fuel tanks, four (4) 1300 gallon diesel generator day tank, and two (2) diesel driven fire pumps are mentioned. No details and specification were provided to establish compliance with Chapter 24 and FAC 62-762 or obtain the necessary approval of the Director of DERM or his designee. (**0023-1-59** [LaFerrier, Marc])

Comment: The expiration date on the copies of USFWS permits No. MB697722-0, MB697722-1 and MB1335540-0, included in Appendix 10.2.10 indicate that these permits expired on March 31, 2009. The applicant shall provide copies of the current permits. (**0023-3-64** [LaFerrier, Marc])

Comment: In Section 5.12, the application states that No variances from applicable regulatory standards are being sought for construction of the Project. In Section 4.5.5, however, the application states that a variance is needed. (**0023-3-66** [LaFerrier, Marc])

Comment: The application states that FPL will prepare and submit an earthwork and materials disposal plan prior to the start of construction. (**0023-4-21** [LaFerrier, Marc])

Comment: The COL application proposes the discharge of cooling tower blowdown from Units 6&7 to underground injection wells within the Boulder Zone of the Lower Floridan Aquifer. FPL makes the assumption that a Class I Underground Injection Control permit will be issued by FDEP. However, a FDEP permit has not been acquired for this action, to date. (**0025-3-20** [Kimball, Dan] [Lewis, Mark])

Response: An appendix of the EIS will contain a list of environmental-related authorizations, permits, and certifications potentially required by FPL from Federal, State, regional, local, and affected Native American Tribal agencies related to the COLs for proposed Turkey Point Units 6 and 7.

Comment: DERM has determined that the proposed work or activity may result in adverse environmental impacts as defined in Section 24-5 of the Code of Miami-Dade County. The application does not contain sufficient information to evaluate the project's environmental impacts, benefits, and detriments with regard to assessment points numbers 1 thru 6 as defined in Section 24-5 of the Code of Miami-Dade County under Comprehensive Environmental Impact Statement. (0023-3-42 [LaFerrier, Marc])

Response: This comment refers specifically to the Site Certification Application (SCA) submitted to the State of Florida by FPL, but it indicates an interest in the potential impacts of the proposed plant on the environment. The potential impacts of building and operating the proposed plant on the environment will be addressed in Chapters 4, 5, and 7 of the EIS, based on the affected environment described in Chapter 2.

Comment: Please clarify mitigation success criteria for the proposed mitigation plans. What are the projected goals? What will constitute success? Please include details of the routine monitoring and maintenance plans designed to achieve planned success levels that are required in order to evaluate the adequacy of the proposed mitigation. (**0023-3-50** [LaFerrier, Marc])

Response: This comment refers to the SCA submitted to the State of Florida by FPL, but it indicates an interest in mitigation of the impacts of proposed Turkey Point Units 6 and 7 on wetlands. The potential impacts of building and operating the proposed plant on wetlands and potential mitigation of those impacts will be discussed in Chapters 4 and 5 of the EIS, based on the affected environment that will be described in Chapter 2. A wetland mitigation plan is included in the Clean Water Act (CWA) Section 404 permit application submitted to the U.S. Army Corps of Engineers (USACE or Corps). Monitoring plans during building and operating the proposed plant will be presented in Chapters 4 and 5.

Comment: The Draft EIS should discuss any plans by the applicant to seek a Limited Work Authorization (LWA). On similar projects an LWA was sought prior to certain environmental permits being obtained. EPA understands that an LWA could potentially authorize site development and deep/shallow foundation construction. (**0014-3** [Mueller, Heinz])

Comment: The parks encourage the NRC to carefully analyze the activities which would be permitted as Preconstruction Activities and/or Limited Work Authorization Construction. This project is located in a highly sensitive, wetlands coastal environment, immediately adjacent to a national park, and components of the COL are proposed to run through or adjacent to a second national park. This permit evaluation will examine the environmental impacts of roads, bridges, facility location, transmission lines, cooling water pipelines (radial collector wells), and other issues. Although these non-safety related components may frequently be allowed as Preconstruction Activities and/or Limited Work Authorization Construction, the parks believe many of these activities present the potential for cumulative impacts to this sensitive ecosystem and require a greater amount of environmental review than the LW A process provides. (0025-1-2 [Kimball, Dan] [Lewis, Mark])

Response: Cumulative impacts are the impacts that result from the combination of the proposed action and past, present, and reasonably foreseeable actions, regardless of who takes the actions. The cumulative impacts associated with building and operating proposed Units 6 and 7, including those actions identified as preconstruction, will be evaluated for each affected resource. The results of cumulative impact analyses will be presented in Chapter 7 of the EIS. FPL withdrew its request for a limited work authorization (LWA) in a letter to the NRC dated November 10, 2009.

2. Comments Concerning Process – NEPA

Comment: NPS urges a comprehensive evaluation, additional documentation, and consultation with respect to potential impacts of the Turkey Point 6 & 7 Project and other power plant and transmission corridor site alternatives. NPS concerns should be addressed in the EIS process in order to avoid and minimize potential adverse impacts to the resources and values of Biscayne and Everglades National Parks and conflicts with CERP goals and projects. (**0025-2-19** [Kimball, Dan] [Lewis, Mark])

Response: The potential impacts of building and operating the proposed units at the alternative sites will be discussed in Chapter 9 of the EIS. The alternative sites will be compared against the proposed site to determine whether any of the alternative sites are environmentally preferable to the proposed site. The environmental impacts of building and operating the proposed transmissions lines will be addressed in Chapters 4, 5 and 7. Alternative transmission corridors would not typically be considered within the context of an NRC EIS for a proposed nuclear power plant. However, the Corps of Engineers, and perhaps the National Park Service, will be cooperating with the NRC on the EIS. To the extent that a cooperating agency addresses such alternatives for its NEPA analysis, those alternatives would likely be included in this EIS in order to support the cooperating agency's environmental review.

3. Comments Concerning Site Layout and Design

Comment: We also know through many studies by scientists that the sea level waters are rising and that I have been told through a presentation through an environmental group that I'm a part of and on committees with different towns -- I'm on a lot of different groups -- that they're going to raise their plant, I thought it was 28 feet; Lloyd said 24. The reality is they know that it's a problem. (0001-11-4 [Amor, Valerie])

Comment: Please publish a map showing new and existing canals, pipelines, STAs, pump locations, and pump capacities associated with the water management feature(s). (**0022-3-10** [Reynolds, Laura])

Comment: Please state the specific material that will be used to line the water management feature(s) and state the minimum thickness of the lining. (**0022-3-11** [Reynolds, Laura])

Comment: Please state whether the lining of the water management feature(s) will be impervious to the flow of groundwater. (**0022-3-12** [Reynolds, Laura])

Comment: Please state how the lining of the water management feature(s) will be stabilized knowing that groundwater continually flows through the Biscayne Aquifer. (**0022-3-13** [Reynolds, Laura])

Comment: Please state the number of times the water management feature(s) can be drained and refilled while retaining its structural integrity. (**0022-3-14** [Reynolds, Laura])

Comment: Please state how long the applicant plans to own and operate the water management feature(s). (**0022-3-17** [Reynolds, Laura])

Comment: Please state the dimensions, capacities, and location(s) of the water management feature(s) resulting from excavations of the FPL-Owned fill source (rockmines). (**0022-3-7** [Reynolds, Laura])

Comment: Provide a process flow with description of the proposed FPL reclaim treatment plant & plant effluent. (0023-1-27 [LaFerrier, Marc])

Comment: [P]lease provide a detailed map of all FPL land holdings within the Biscayne Coastal Wetlands and Model Lands Basins. Please identify on the map which areas are proposed for development and which are proposed for mitigation. (**0023-4-3** [LaFerrier, Marc])

Response: A description of the FPL site layout, the reactor type, and the cooling-water systems for proposed Turkey Point Units 6 and 7 will be provided in Chapter 3 of the EIS. Offsite features associated with the proposed units will also be described in Chapter 3.

Comment: Please provide plans for the handling and disposal of the spoils generated from demucking of the Units 6 & 7 site. (**0023-1-20** [LaFerrier, Marc])

Comment: Please submit evaluation criteria for non-acceptable vs. acceptable material that would be used for common or structural backfill and demonstrate how the criteria for material that would be used for common or structural backfill meet the clean fill requirements of Section 24-48, Miami-Dade Code. (**0023-1-21** [LaFerrier, Marc])

Comment: Please identify temporary vs. permanent impacts expected to result from the proposed work within the barge unloading area, and provide a detailed description of these impacts. (0023-1-23 [LaFerrier, Marc])

Comment: The application did not provide sufficient information to fully evaluate work proposed in the barge area. Please submit detailed plans, including but not limited to applicable site surveys, site plan and cross sectional views with mean high water and mean low water lines, existing depth and proposed resulting depth of the turning basin, details of any proposed alteration of the existing shoreline inclusive of complete designs for creating any vessel notches or bays, as well as detailed stabilization methodology for any portion of the shoreline that is to be modified as a result of the proposed expansion of the Barge Turning Basin. (0023-1-24 [LaFerrier, Marc])

Comment: [I]nclude sufficient information for the radial collection wells, specifically the spacing between the well screen laterals and the maximum distance that the well screen laterals will extend under Biscayne Bay. Please show the boundaries of sovereign submerged lands and the extent to which the radial collection wells would be located within sovereign submerged lands. (0023-1-43 [LaFerrier, Marc])

Comment: Pipe installation and canal crossing details were not provided. (**0023-1-54** [LaFerrier, Marc])

Comment: Table 4.5-1 (Stream Number 36) lists the reclaimed water volume to FPL as 72.7 MGD (50,481 gpm) and Appendix 10.9, Section 2.0 states Turkey Point Units 6 & 7 will require 55.3 million gallons per day (MGD) if supplied from reclaimed water. The discrepancy in the reclaimed water volume is not addressed. (**0023-1-65** [LaFerrier, Marc])

Comment: The quantity of fill needed for Unit 6&7 and associated facility construction, the quantity of fill to be extracted at this site, the dimensions of the rock pit. Commitment approved by MDC CAO that no fill will be sold. (**0023-3-4** [LaFerrier, Marc])

Comment: Geologic cross section of the proposed excavation (including the amount of water storage above- and below-ground, detailed information on the depth of the area to be mined) (**0023-3-6** [LaFerrier, Marc])

Comment: The application states that muck removed from several construction sites will be stored in the spoil disposal site. (**0023-4-13** [LaFerrier, Marc])

Comment: Application does not provide information on demolition or renovation that may occur as part of this project. (**0023-4-6** [LaFerrier, Marc])

Response: These comments refer specifically to the SCA submitted to the State of Florida by FPL, but they indicate an interest in the activities that will occur to build proposed Turkey Point Units 6 and 7. Chapter 3 of the EIS will describe the activities that will be taken to build the proposed units. The review team will assess the potential impacts of building the proposed units in Chapter 4 of the EIS.

Comment: Are there any roads, whether for plant access or associated with the transmission lines that are being proposed as temporary roads? If so, please identify them and provide a map of their locations. (**0023-1-52** [LaFerrier, Marc])

Comment: No data is provided indicating which roads are temporary, which roads are to be left as-built, and which roads are to be reduced after construction of power generation units and supporting facilities. (**0023-2-22** [LaFerrier, Marc])

Comment: The application does not adequately depict property ownership in areas surrounding proposed linear features such as access roads, including Miami-Dade County Environmentally Endangered Lands (EEL) Program projects that have been at least partially acquired. (**0023-2-6** [LaFerrier, Marc])

Comment: Information including but not limited to depth, slope, deep cut lines, levee height, etc for the water management feature and rock mining activities proposed for the FPL owned fill source are not provided in the application. (**0023-3-14** [LaFerrier, Marc])

Comment: No sketches are provided clearly denoting if rights-of-way shown are FPL right-of-way, road right-of-way or other right-of-way. (**0023-3-29** [LaFerrier, Marc])

Comment: No data is provided describing the existing available right-of-way and ownership thereof. Provide clear maps denoting the aforementioned. (**0023-3-30** [LaFerrier, Marc])

Comment: The applicant shall provide detailed information on the elevation of all project features that is sufficient to determine whether this requirement has been met. (**0023-3-44** [LaFerrier, Marc])

Comment: Detailed information on the proposed excavation including the exact proposed location not provided. (**0023-3-5** [LaFerrier, Marc])

Comment: The application does not provide sufficient information to determine whether all construction operations involving earthwork, including disposal, are limited to clean fill. (**0023-4-12** [LaFerrier, Marc])

Response: These comments refer specifically to the SCA submitted to the State of Florida by FPL, but they indicate an interest in the layout of the proposed plant. The layout of features associated with proposed Turkey Point Units 6 and 7 will be described in Chapter 3 of the EIS. The review team will assess the potential impacts of building the proposed units in Chapter 4.

Comment: The project's draft PSD permit incorporates the use of reclaimed water as the primary source of cooling water for the cooling towers as well as the use of salt water from radial collector wells as a backup source or some combination of the two as necessary. As presented in the PSD emissions calculations, particulate emissions are highly dependent on the source of the cooling water. The Draft EIS should discuss: impacts related to particulate emissions with respect to the-source of the cooling water; anticipated availability of reclaimed water to support the new units in addition to existing units; recordkeeping and monitoring plans to assess water flow rates and the ratio of reclaimed to salt water used; and any salinity changes outside of the range used for the emissions calculations. (0014-20 [Mueller, Heinz])

Comment: As mentioned previously, FPL apparently proposes that Units 6 and 7 will have their cooling water needs provided by cooling towers as opposed to the existing canal system. The Draft EIS should discuss the wastewater-to-reclaimed water process, including describing the processes to remove debris, sand, sediment, and other large solids. The Draft EIS should discuss use of any microorganisms to break down organic materials, proposed clarifiers to remove microorganisms and remaining solids, filtering processes, and what type of disinfection (chlorine?) will be used to kill microorganisms. The monitoring of the re-use facilities and processes should be discussed in order that only high-quality reclaimed water is distributed and that it is clear and free of pathogens. (0014-8 [Mueller, Heinz])

Comment: Please provide a schedule of radial collector well operation including initial operation and all planned subsequent events, as well as monitoring protocol for the above-mentioned resources. (**0018-15** [Poole, Mary Ann])

Comment: 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. (0022-2-11 [Reynolds, Laura])

Comment: 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. (**0022-2-12** [Reynolds, Laura])

Comment: 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. (0022-2-15 [Reynolds, Laura])

Comment: 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. (0022-2-4 [Reynolds, Laura])

Comment: 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. (**0022-2-5** [Reynolds, Laura])

Comment: 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. (**0022-3-20** [Reynolds, Laura])

Comment: 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. (**0022-4-1** [Reynolds, Laura])

Comment: Pretreatment of the wastewater reuse source water to include treatment of EPOCs should be evaluated, considering Biscayne National Park's status as an Outstanding Florida Water Body with a no degradation standard under Florida Statutes. (**0025-3-24** [Kimball, Dan] [Lewis, Mark])

Comment: If the water reservoir for Units 6&7 is unlined, the seepage of wastewater constituents, including EPOCs, will occur to the Biscayne Aquifer and cause uptake to adjacent wetlands; migration of these contaminants will be transported subsequently to the bay. The ecological impacts associated with an unlined reservoir should be evaluated. (**0025-3-26** [Kimball, Dan] [Lewis, Mark])

Response: The proposed design for Turkey Point Units 6 and 7, including cooling tower and injection well performance, will be addressed in Chapter 3 of the EIS. The review team will assess the potential impacts of operating the proposed plant in Chapter 5, based on the affected environment described in Chapter 2. The EIS will include citations for documents used in its preparation.

Comment: Based on the review of the Environmental Report, Part 3, submitted as part of the Nuclear Regulatory Commission (NRC) Combined Operating License (COL), several inconsistencies have been noted when compared to the State of Florida Site Certification Application (SCA). The COL and the State of Florida SCA should contain the same design specifications and construction elements. For example, the FPL-owned fill source (rock mine) has been removed from the State of Florida SCA and the Army Corps of Engineers permit application. Without the Florida and ACOE permit approvals, the excavation cannot proceed. (**0025-1-3** [Kimball, Dan] [Lewis, Mark])

Response: The NRC process is to review the license application and prepare an EIS based on the actions proposed in that application. Information to be used during the review will include documents obtained from State and Federal agencies, including the SCA, to the extent necessary to characterize the Turkey Point site. The FPL-owned fill source remains in the COL application at this time and a review of the environmental impacts of obtaining fill material will be presented in Chapter 4 of the EIS.

Comment: Not enough information provided to assess water supply alternatives. Appendix 10.9 is a summary of alternative water supply study conducted by FPL. MDWASD has not received the reports cited in the Appendix (Analysis of Baseline Water Source, HDR Dec. 2007; Task 1 Initial Water Source Alternative Screening, HDR March 2008; Task 2 and 3 Water Source Alternative Characterization and Scope, HDR March 2008; Conceptual Engineering of Cooling Water supply and Disposal for Turkey Point Units 6 & 7, HDR, June 2008; Cooling Water Supply and Disposal Conceptual Design Report, HDR, March 2009). (**0023-1-56** [LaFerrier, Marc])

Comment: Condition 5 of Z-56-07 requires FPL to provide an alternative water source plan that will outline all sources of water not supplied by WASD through reuse. (**0023-3-41** [LaFerrier, Marc])

Comment: Please provide additional information on the quality, quantity, timing and reliability of the proposed reclaimed water for hydrologic improvements. (**0023-4-2** [LaFerrier, Marc])

Response: These comments are directed at the applicant and refer specifically to the SCA submitted to the State of Florida by FPL, but they indicate an interest in the cooling water supply for the proposed units. The cooling-water source for proposed Turkey Point Units 6 and 7 will be described in Chapter 3 of the EIS. Alternative water supplies will be considered in Chapter 9.

Comment: Most of the lands adjacent to the proposed roadway segment improvements occur within the boundaries of the Biscayne Bay Coastal Wetlands CERP Project, and several segments would be located where this CERP project proposes infrastructure for restoration of the surrounding wetlands and Biscayne Bay. These road improvements would directly interfere with CERP features associated with the Biscayne Bay Coastal Wetlands Project, including pumps and spreader canals. (0023-2-18 [LaFerrier, Marc])

Comment: Please address how the proposed roadway features would be constructed to be consistent with the proposed CERP features. (**0023-2-19** [LaFerrier, Marc])

Comment: The applicant must provide a detailed map identifying areas where roads or road improvements would not be completely contained within the boundaries of either FPL-owned land or an existing public right-of-way. The applicant must also identify adjacent property owners whose land may need to be obtained to accommodate the road or road improvements, including but not limited to the Miami-Dade Environmentally Endangered Lands Program, and explain the process by which the additional property will be obtained. (**0023-2-21** [LaFerrier, Marc])

Response: These comments refer specifically to the SCA submitted to the State of Florida by FPL, but they indicate an interest in the proposed road improvements associated with building and operating Turkey Point Units 6 and 7. The EIS will describe the proposed road improvements in Chapter 3 of the EIS. The impacts of these road improvements will be presented in Chapters 4 and 5. The cumulative impacts of road improvements and CERP actions will be presented in Chapter 7 of the EIS.

Comment: 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. (0022-2-14 [Reynolds, Laura])

Response: The cumulative impact of the operation of proposed Turkey Point Units 6 and 7 and existing facilities that impact groundwater, such as the aquifer storage and recovery wells located in the vicinity of the Turkey Point site, will be addressed in Chapter 7 of the EIS.

Comment: Flow rate used to calculate water demands on Table 4.5-1 not provided. Not clear on how water demands for potable water use were calculated. (**0023-1-55** [LaFerrier, Marc])

Comment: No information was provided to show that the facility will be in compliance with the Flood Plain Management requirements including flood proofing as may be required. Please explain why existing runoff from pre-development conditions results in more runoff volume than post development conditions, despite the fact that the pre-development plant site is mostly undeveloped and should have no runoff volume to be pre-treated. (**0023-1-61** [LaFerrier, Marc])

Comment: Details for road improvements list"...NHW Elevation to be provided by DERM. Please provide further explanation as to what is expected. (**0023-1-69** [LaFerrier, Marc])

Comment: Pursuant to Condition 9 of Z-56-07, Planned restoration features such as, but not limited to, pump PU-M3 (BBCW proposed project feature] and downstream hydrologic restoration shall not be compromised or constrained by the roadway(s). The application does not contain sufficient information to determine whether the requirements of Condition 9 of Z-56-07 have been met. (0023-2-33 [LaFerrier, Marc])

Comment: Pursuant to Condition 9 of Z-56-07, Sheet flow shall be maintained across roadway alignments by elevating portions of the roadway and through the installation of culverts in other areas. The application does not contain sufficient information to determine whether the requirements of Condition 9 of Z-56-07 have been met. (**0023-2-34** [LaFerrier, Marc])

Comment: Roads are to be constructed to comply with Flood Criteria requirements, at a minimum. Assess impact on a larger study area. (**0023-2-35** [LaFerrier, Marc])

Comment: No data is provided describing the existing available right-of-way and ownership thereof. Provide clear maps denoting the aforementioned. Clearly denote which roadways are to be public and which are to be private. Provide clear maps denoting the aforementioned. All roads to be dedicated as public right-of-way (arterials-section lines and half-section lines) should include the following: dedication of the zoned right-of-way for future widening and no easements within said right-of-way. Any utilities within the right-of-way will be allowed to be installed by permit only. No sketches are provided clearly denoting if right-of-way shown are FPL right-of-way, road right-of-way or other right-of-way. (**0023-2-36** [LaFerrier, Marc])

Comment: The traffic studies provided in Appendices 1 0.7.4.1 and 1 0.7.4.2 do not demonstrate the need for construction vehicle traffic access to the power plant site from SW 359 Street. (0023-2-37 [LaFerrier, Marc])

Comment: [T]he traffic studies presented in Appendices 10.7.4.1 and 10.7.4.2 do not provide sufficient data to demonstrate the need for the proposed roadway improvements. (**0023-2-38** [LaFerrier, Marc])

Comment: Assumptions: Substantiate the following assumptions: maximum work-force of 3,650 construction workers and vehicle occupancy of 1.0 worker per vehicle. Study Area. Given the amount of vehicular traffic likely to be generated, the number of employees and the size of project, the study area to be analyzed shall include all roadway facilities where traffic generated by the proposed project is equal to or greater than five (5) percent of the maximum service volume at the adopted level of service standard applicable to the roadway facility. Trip Generation. Given the unique characteristics of the use proposed, the trip generation shall include the following information: average daily, AM peak hour and PM peak hour. Consider car pooling, van pooling or employer-based car pooling. Analysis Period. Consider three analysis periods: Short-term (Concurrency Analysis for 3 years; construction is estimated to begin in 2011); and long-term (Years 2016 and 2020). Peak construction employment for the project is estimated for 2016; Project construction is estimated to conclude in 2020. Trip Distribution. For the Concurrency Analysis use the Cardinal Directional Trip Distribution from Zone 1401 and Year 2015, and the computerized travel demand forecasting (FSUTMS) model, refined where needed, for Years 2016 and 2020. (**0023-2-39** [LaFerrier, Marc])

Comment: Future Conditions Analyses. Perform an assessment of future conditions on the study area roadways for the long-term planning horizons without the impacts of the application-generated traffic; perform other assessment of future conditions on study area roadway and intersections with the impacts of the application-generated traffic. Incorporate programmed and planned roadway improvements consistent with Adopted Plans and Programs above. Mitigation Analysis. If the application causes the study area roadways to fall below their adopted LOS standards, recommend mitigation through physical or operational improvements, travel demand management strategies, fair-share contributions, or a combination of these or other strategies. (0023-2-40 [LaFerrier, Marc])

Comment: Provide detailed supporting documents for trip generation of 3,650 construction peak period employees. Document all the growth rates and estimate growth factors values for different analysis years. Since there are different peak hours for construction (5:00 AM to 6:00 AM) and regular employees arrival (6:00 AM to 7.00 AM), traffic volumes for these two hours should not be combined in the analysis. Future roadway improvements in TIP, LRTP and Comprehensive Plans of effected jurisdictions should be investigated and listed in the report. Potential improvements may include bike trails, greenways and roadways etc. Potential improvements for trip generation of 36 construction-related trucks per hour. The existing truck volumes should also be included in the traffic data collection. This data can provide more accurate operational analysis as well as pavement design. To ease the review process, please provide traffic counts in the form of maps. Provide detailed supporting documents for trip generation of 806 and 2000 employees in normal traffic operational analysis for Scenario 1 and 2, respectively. Presence of only 940 employees during data collection period while 1,467 employees work. Therefore, trips should be adjusted, or it should be

documented that only 940 employees are usually present. Please note that traffic data should be adjusted for all types of seasonal variations. (**0023-2-41** [LaFerrier, Marc])

Comment: Parking demand and supply analysis should be included in the report. Regional traffic impact analysis should also be conducted because of the anticipated high peak-hour volumes generated during peak periods. Different access routes should be explored to the site, such as through SW 328 Street. (0023-3-57 [LaFerrier, Marc])

Comment: Pursuant to Condition 21 of Z-56-07, FPL has agreed to allow water level increases on the project site on the order of one foot or more, pursuant to regional restoration projects, and will design the project to accommodate these water level increases at FPL's expense. Information in the application is not sufficient to determine whether the requirements of this condition have been met. (0023-3-65 [LaFerrier, Marc])

Comment: Further elaboration is needed on item 49 on Table 4.5-1 and noted in Figure 4.5-1 (Effluent from FPL Reclaimed TP to Future FPL Users = 9,739 gallons per minute). (**0023-3-67** [LaFerrier, Marc])

Comment: Please submit the earthwork and materials disposal plan required under Condition 7 of Z-56-07. The plan should include, but not be limited to plans and sketches pertaining to the proposed Spoil Areas including elevation details and slope stabilization. The applicant should also provide the management plan for listed species required under Condition 2 of Z-56-07, which should include but not be limited to identifying the plans established to protect endangered or threatened species from impacts resulting from the proposed work. (0023-4-19 [LaFerrier, Marc])

Response: These comments are directed at the applicant and refer specifically to the SCA submitted to the State of Florida by FPL, but they indicate an interest in site layout and design. The review team will describe the layout of proposed Turkey Point Units 6 and 7 and support features in Chapter 3 of the EIS. The potential impacts of building the proposed units will be presented in Chapter 4, and the potential impacts of operating the proposed units in Chapter 5.

Comment: Under what circumstances would the radial collector wells be required to be used and at what capacities? Under what specific anticipated circumstance would radial collector wells constitute 100% of water source composition? (**0018-13** [Poole, Mary Ann])

Response: The proposed cooling-water source for proposed Turkey Point Units 6 and 7, including operational information provided by FPL, will be described in Chapter 3 of the EIS.

4. Comments Concerning Land Use – Site and Vicinity

Comment: The Miami-Dade Board of County Commissioners, where Dennis C. Moss sits as the Chairman, recently approved a land use change in order to accommodate the expansion plan, which is the subject of the request that is before you today. (**0001-26-3** [Gustave, Unito])

Comment: The proposed expansion by Florida Power and Light involves the land use of 38,607 acres composed of wetlands, agricultural land, barren land, and water. Less than 5% of the proposed expansion involves the use of pre-established urban or built up land. (**0007-2** [Burris, Jessica])

Comment: The project should be consistent with the Goal, Objectives, and Policies of the Miami-Dade County Master Development Comprehensive Plan and its corresponding land development regulations. It is important for the applicant to coordinate permits with all governments of jurisdiction. (0019-12 [Hamilton, Karen])

Comment: Council staff recommends that the Goals and Policies of the Strategic Regional Policy Plan for South Florida (SRPP) related to protecting and enhancing South Florida's natural resources should be observed (**0019-13** [Hamilton, Karen])

Comment: Consider the full the impacts of construction of the plant, and related facilities as they relate to rights-of way issues, relocation of facilities and infrastructure, and provide the appropriate mitigation strategies. (**0019-4** [Hamilton, Karen])

Comment: The plant site is located in Environmental Protection Subarea F, and is consistent only if the use is deemed consistent with the goals, objectives and policies of the Comprehensive Development Master Plan (CDMP). (**0023-1-30** [LaFerrier, Marc])

Comment: Potential viewshed impacts may increase over current levels in Biscayne National Park from the construction of Units 6&7 and non-transmission facilities. This will impact visitor use and experience within the park and should be evaluated. (**0025-3-27** [Kimball, Dan] [Lewis, Mark])

Comment: The scope of this project (adding two new reactors) is extraordinarily large. It will more than double the size of the existing plant. It requires changes in land use designations, unbelievable amounts of fill, building heavy duty roads, modifying shorelines, destroying wetlands and hammocks, digging a very large hole in South Dade for fill, (not to be restored), digging radial and injection wells, installing a wastewater treatment plant, installing a water treatment plant, installing miles of transmission lines, installing miles of pipelines, changing the horizon, and in effect building a small industrial city, yet FPL insists in their license application that this project in its entirety will have small to no impact. Amazing. Of course there will be an environmental impact and a big one. (0027-3 [Moses, Dorothy])
Comment: Identify specific measures that will be adopted to protect the environmentally sensitive lands south of Palm Drive (S.W. 3 4 4th Street) from illegal access and activities such as dumping, use of all-terrain vehicles, and poaching. The new roadways proposed south of Palm Drive will increase opportunities for illegal access to environmentally sensitive lands, including those in the Model Lands Basin area. (0032-38 [Golden, James])

Response: Land-use impacts of building and operating proposed Turkey Point Units 6 and 7 and associated offsite facilities and transmission lines will be presented in Chapters 4 and 5 of the EIS, and cumulative land-use impacts will be presented in Chapter 7. The analysis of land-use impacts will address the general consistency of the proposed new facilities with applicable zoning regulations and land-use plans. Many of the land-use issues raised in this set of comments overlap with ecological issues, which will also be addressed in Chapters 4, 5, and 7.

Comment: The SFWMD recommends that the following issues be addressed in the Environmental Impact Statement: Electrical Transmission Lines – The potential for adverse impacts to the SFWMD's L-30 and L-31N Canal levees, which are located within the West Preferred Corridor. FPL is proposing use the existing access roads on the canal levees for construction and maintenance purposes; however, portions of the levees have not been designed to accommodate the heavy equipment proposed to be used by FPL; therefore, the levees will need to be enhanced and widened. The SFWMD advised FPL that any proposed levee enhancements will need to meet USACE design specifications, compaction, and side slope stabilization (grass/sod) requirements. (0032-21 [Golden, James])

Comment: The SFWMD recommends that the following issues be addressed in the Environmental Impact Statement: Electrical Transmission Lines – The potential for adverse impacts to wetlands that are part of northeastern Shark River Slough, within the boundaries of Everglades National Park, and wetlands within Water Conservation Area 3B, associated with the West Secondary Corridor. Both of these areas are part of the Everglades Protection Area as defined in the Everglades Forever Act and are targets for restoration under CERP. FPL has not provided adequate information on potential impacts from the construction, operation, and maintenance of the proposed transmission lines and related access (fill) roads through these areas. Currently, there are no existing access roads in this area other than the L-30 and L-31 N levee roads. New road construction would result in long-term impacts to wetland habitat, disrupt existing hydrologic flows, and impact water quality. New road construction would potentially conflict with future CERP project restoration efforts related to the relocation of the S-356 pump station and the promotion of wetland sheet flow. Vehicles (other than airboats) moving over the wetlands (without roads) would also result in major disturbance to existing wetlands by compacting soils, disrupting existing hydrologic flows, and impacting habitat for listed species. (0032-24 [Golden, James])

Response: Environmental impacts associated with planned new transmission corridors, as well as potential impacts associated with upgrades to the existing lines, if required, will be addressed

in Chapters 4, 5, and 7 of the EIS. The analysis will consider possible effects on canals, levees, and other existing facilities in the affected areas as well as planned future Everglades' restoration projects.

Comment: Then there's a plan to put those two nukes on a pile of dirt 24 feet high, about 10 million cubic yards. The bulk of this would come from a piece of property that FPL owns back from the edge of the Bay. That will take a very large hole, very deep. (**0001-6-7** [Miller, Lloyd])

Comment: The Draft EIS should discuss sources of limestone rock proposed for use in the construction of Units 6 and 7. Any impacts from required mining should be discussed, particularly the impacts on Biscayne National Park or U.S. Air Force lands. (**0014-12** [Mueller, Heinz])

Comment: The allowance of rockmining in agricultural areas is subject to approval of an amendment to the Comprehensive Development Master Plan. FPL has filed an amendment; however no action will be taken by local government until October 2009. Approval of this amendment is subject to extensive informational requests which have not been provided through this application. Therefore land use/zoning consistency cannot be determined at this time. (**0023-3-2** [LaFerrier, Marc])

Response: The impacts of the proposed offsite fill-source operation as a part of building proposed Turkey Point Units 6 and 7 will be considered in Chapters 4 and 7 of the EIS. The analysis of land-use impacts in Chapters 4 and 7 will address the general consistency of the proposed fill-source operation with applicable land use plans and regulations.

Comment: Please verify whether all proposed road construction, including stabilization slopes, will fall within the road ROW's. How will proposed impacts, either direct or secondary, adjacent to private property and areas held under conservation easement be addressed? (**0023-3-54** [LaFerrier, Marc])

Response: Environmental impacts associated with planned new roadways, as well as potential impacts associated with upgrades to the existing roadways, if required, will be addressed in Chapters 4, 5, and 7 of the EIS.

Comment: Indicate which roadway improvements will be temporary and which will be permanent and specify the time-frames when each temporary roadway improvement will be restored to its previous, or better, condition. Although the applicant, FPL, indicates that all of the roadway improvements will be temporary, the County's Supplement to the Initial Recommendations Report for Application 6 states, "The [Miami-Dade County Planning] Department favors the dedication of the proposed roadway improvements as permanent facilities". Without clear identification of temporary and permanent roadway improvements, the District cannot identify all potential impacts. (0032-33 [Golden, James])

Comment: Include the additional roadway improvements proposed under the Additional Access Option in the plan. The plan only addresses the roadway improvements proposed by FPL. It should be modified to include the additional roadway improvements under consideration that are referred to in the County's Supplement to the Initial Recommendations Report as the Additional Access Option. (0032-37 [Golden, James])

Response: Potential impacts associated with roadways will be addressed in Chapters 4, 5, and 7 of the EIS. The analysis will distinguish temporary from permanent roadway improvements. The review team does not advise the applicant on alternative roadway improvement plans; these decisions are made by the applicant and State regulatory bodies. Therefore, the choice of roadway improvements will not be addressed in the EIS.

5. Comments Concerning Land Use – Transmission Lines

Comment: I'm mindful of the concern of many of my fellow cities north of us with the transmission line issue. Those issues do not pertain to the City of Florida City at all. However, I believe that it's good for us to understand, and I believe this is the fact, that with regard to transmission lines, it doesn't matter what kind of power source we eventually construct at the Turkey Point site. If we construct fossil fuel plants, a fossil fuel plant, that power will still have to be transmitted. Hence, the transmission lines will be necessary no matter the type of generation system we have there. So the transmission line issue is not a child of the nuclear reactor request. And I think we are going to have to figure out a way to take care of transmission regardless of the power source. (**0001-1-3** [Wallace, Otis])

Comment: Lastly, the plan calls for nearly 90 miles of new transmission corridors. NPCA is particularly opposed to the western corridor proposal which calls for the construction of more than 50 miles of power lines either within or adjacent to Everglades National Park. FP&L hasn't given any alternative plans that are acceptable with respect to the placement of these power lines, which are bad for migratory birds, parklands, and wetlands alike. (**0001-15-4** [Cornick, Lance])

Comment: The impact that we are most immediately dealing with is the Florida Power and Light's transmission line process that they have undertaken from -- as a result of the Florida statutory framework. We are participating within that administrative hearing. And as a result of the environmental study indicating that you are also going to be looking at that as an indicator, we will be giving you some very specific information about the incompatibility and very adverse impact of the proposed alternate corridor along US-1. We have a process that we are a part of where we will be submitting an alternate corridor outside of the US-1 corridor for the siting of the transmission lines. (**0001-21-1** [Lerner, Cindy])

Comment: In addition, the US-1 corridor, as I said, is our only commercial area. And we are working towards plans -- you'll hear from my colleagues about the plans they have already

implemented for the ability to take the US-1 corridor, which is our major transit, transportation, and commercial corridor, and over the course, the vision for Miami-Dade County for the future of the US-1 corridor is to create the opportunity for in-fill by having mixed use development along that corridor, encouraging people to move along the corridor and use the transit that is there as opposed to going out and having the sprawl that we are all fighting against. And preserving the urban development boundaries would require that we focus on mixed use development along US-1. Placing the power lines along that US-1 corridor would absolutely not only inhibit, it would destroy any commercial interest or development in coming along and complying with that. (**0001-21-4** [Lerner, Cindy])

Comment: We're here to talk jobs. Just as the discussion is jobs in regards to the nuclear power plant such as with the siting lines, we're here to present a pro-business, a pro-job argument for why we need the least intrusive siting of these lines. Now, to a large degree we've been powerless in this regard because with the state statutes that govern siting, there's really no discretion that has been allowed within the different municipalities. In essence, we've been preempted and it's a state matter that will eventually go before the Cabinet if we get in front of the Administrative Law Judge. For the record, what I would like to bring and present to you on DVD's are the legislative actions that the various three municipalities have taken in regards to the US-1 Business District and the transmission sitings. And what these are are the resolutions as well as some of the charrette plans and the other actions that we've taken. Now, I would like to make that part of the record on behalf of the Village of Palmetto Bay, the town of Cutler Bay, and the Village of Pinecrest. (**0001-22-1** [Flinn, Eugene])

Comment: Why that's important -- and Mayor Vrooman will discuss in more detail those charrettes that he's been involved in, that we've been involved in in regards through Chambers South, a very important community partner, and the different cities, is one of the first things the Village of Palmetto Bay did in incorporating in 2002, was to attempt to put a rudder on an otherwise local economic area that was adrift. And we are attempting to bring jobs; we are attempting to bring sustainable development. And we believe that the record evidence from an economist and from our engineers, who is going to show that these siting lines have a severe risk in actually forcing sprawl. Why is that? Because they're going to render commercially useless some areas where significant work was done. What I would like to show as our first board here, is this is the Franjo Triangle Commercial Island charrette. And it is a wonderful vision for the community. And I think if you will take a look at this, this is primarily an economic center. It is a mixed use; it does include residential. But you're going to have quite a few jobs, small businesses, which is a huge component of our Miami-Dade County economy here. These lands will be rendered, from some of the information we've received, will be severely impacted by the siting of these lines basically going through them. These lines are incompatible. From what we've seen, these lines are more appropriate what you would see driving down Krome Avenue and those areas that weren't seen fit to put through the areas 30 years ago, they're less fit to put through here now. (0001-22-2 [Flinn, Eugene])

Comment: We are attempting to work with FP&L. It is an adversarial proceeding but we're attempting to work together. We have just passed resolutions, Pinecrest and Palmetto Bay, in regards to engaging an engineer to get us to the first section of this process and have our input. Because we believe there are better locations for these lines without adversely affecting the hard work that's been going on. You have three municipalities here that have done outstanding work since they're been incorporated. And Paul Vrooman, I don't -- maybe I should just yield the floor to you at this point. But our position at this time is that they are incompatible with the area. They could be rendered more compatible if we undergrounded them, which we understand the issues on that. But we're not sure we're getting the feedback or the recognition as to what our issues are. We do not want to render these plans obsolete. If you render these plans obsolete you are going to see no net gain in jobs for the South Dade area; you're going to see no net gain improvement; and the only thing you're going to see coming out of here is power for other areas. (0001-22-3 [Flinn, Eugene])

Comment: Now, we have an opportunity to properly site these areas but that's not the plan on the board here. We have two other boards here. These are not from Palmetto Bay, Pinecrest, or Cutler Bay. But just to show you the charrettes that the South Dade area have been involved in in trying to revision this area, the Leisure City Naranja Lake charrette area plan. And, Paul, if you could talk about the goals and come up with your plan and the South Dade, too. Because we're trying to put together a comprehensive vision for South Dade. This is not a single city issue; this is a regional issue that affects the entire county. And we need to work together to find the least intrusive solution to this problem. And right now we're in a position to where we have to take this head on and try to get a result in the best interest of South Dade. And that's why we're opposing this at this time. (0001-22-4 [Flinn, Eugene])

Comment: I'm proud to be here with my colleagues from Palmetto Bay and Pinecrest and to speak in opposition to the transmission line on US-1. I am not here to speak -- and my mind is not made up -- on the wisdom of the additional reactors. That is not the issue that I am authorized to bring here on behalf of my Town Council. However, I am authorized -- we do have a Resolution on our record that Mayor Flinn turned in that said that we do not feel that it is in the public interest to do transition -- transmission lines up US-1. (**0001-23-1** [Vrooman, Paul])

Comment: And the reason why I want to discuss that is an environmental factor. What is environmental impact? Is it just the impact that happens on the site; is it what happens adjacent to the plant; is it the footprint of the plant; or is it broader policy? Well, we've had discussions in this community on a regional basis about suburban sprawl, and about sprawl going out into places like the Everglades; something that our country is spending billions of dollars to try to mitigate and try to repair. So, if we are creating policies or -- that respond to that as our in-fill policies and our smart growth policies have done on a regional basis to combat that, which essentially means adding mixed use, urban in-fill, transit-friendly development on the US-1 corridor, and this plant results in a transmission line gutting that plan by running up US-1, then I

see that as a very definite environmental impact. The impact of that transmission line won't be -- you won't be able to identify that on US-1 specifically. But I can tell you that when the next ring of homes and the next ring of development goes out into the Everglades because we have not provided an alternative to that on US-1, that will be directly because of these decisions that are going to be made, vis-a-vis this application. (0001-23-2 [Vrooman, Paul])

Comment: I think that we've said that enough times but I do want to reflect that I do see this as an environmental issue. I do see this as effectively gutting the regional response from the county and all the municipalities up and down US-1 to come up with a response to suburban sprawl that is economic friendly. I think if you look at the boards around me, it's not hard to imagine the number of jobs that that will create that will come from that construction, that will come from the businesses that will be there, and it is much, much Greener, environmental friendly alternative growth patterns. And this will be very, very detrimental to our ability to make that come true. (0001-23-3 [Vrooman, Paul])

Comment: I want to agree with the mayors of Palmetto Bay, Cutler Bay, and Pinecrest. We've done some incredible things on walkable areas along US-1. We should protect those and I do believe that should be in the scope. (**0001-24-6** [Harum-Alvarez, Albert])

Comment: Additional environmental destruction would involve their desire to put the transmission lines through Everglades National Park, because all the towns up US-1 don't want any more transmission lines. So where else do you put them? Well, you go tear up the Everglades and put them out there. (0001-6-8 [Miller, Lloyd])

Comment: FPL's proposed transmission corridor will impact upon lands within Everglades National Park and the footprint of BBCW and seek to fill more than 300 acres of wetlands. In addition, the other proposed sites for these transmission lines is along the US-1 corridor which is very important for nodal growth as this is an area where public transportation exists. And, if we don't develop along these nodal corridors, then this encourages sprawl which will, of course, affect Everglades and other wetlands. (**0001-7-5** [MacLaren, Kaitlin])

Comment: In closing, I also want to join the voices of the Mayors from Cutler Bay, Palmetto Bay, South Miami and Pinecrest, who object to the environmental impact of power lines along the US-1 corridor, which would destroy the plans of mixed use pedestrian and transit oriented development, compact urban form that holds the line on urban sprawl, and which in turn protects our Everglades and environmentally sensitive areas. (**0002-1-5** [Sorenson, Katy])

Comment: Power lines through Everglades National Park. That's another part of this licensing thing. The land that was purchased by the people of the United States in a place called the East Everglades Expansion Area, was purchased for one particular reason; the protection and restoration of that section of the Everglades, the Shark River Slough, the heart of the Everglades ecosystem. Now FP&L is planning to put three power lines through that National

Park, the iconic National Park in Florida; 150 feet tall, 500,000 kilovolts each. And they're demanding that the Park turn over the eastern edge to them so they can put this thing in there. How do they get away with that? I looked at the documents at the beginning when that expansion area first came through. NPS looked at that corridor that they owned. They said, well, we valued the land, we can give you 100, \$200,000 for it. When could you turn it over? That was 20 years ago, and now they're on the verge -- National Park Service is on the verge of turning this corridor, on the eastern edge of our Park, over to them. Not only is it going to create an industrial landscape for Everglades National Park, which will happen. 150 foot tall towers would be visible from Shark River Slough. (0002-14-9 [Schwartz, Matthew])

Comment: The transmission lines along the US-1 corridor is a direct contradiction of what we, the leaders of these cities, have envisioned for an improved US-1 corridor which will allow us to go ahead and develop our communities in smart ways rather than going further into the Everglades. (0002-2-2 [Meerbott, Tim])

Comment: Do not allow transmission lines to be run down US 1. This is a primary federal highway that runs directly through many south Florida cities. Please run these down our expressways and railway right of ways to prevent aesthetic loss of property values along our cities. (**0008-3** [Garcia, Preston])

Comment: Consider the full the impacts of construction of the transmission lines and related facilities as they relate to rights-of way issues, relocation of facilities and infrastructure, and provide the appropriate mitigation strategies. (**0019-5** [Hamilton, Karen])

Comment: Ensure the proposed transmission lines are compatible with existing and future uses in terms of mass, scale and height. (**0019-7** [Hamilton, Karen])

Comment: Consider how the placement of transmission lines along the more urbanized areas of the two proposed corridors will affect future opportunities to provide new transit features, the South Miami-Dade Busway or Metrorail expansion, greenways and pedestrian features, redevelopment projects, and scheduled roadway improvements (**0019-9** [Hamilton, Karen])

Comment: Provide contextual perspectives for both existing and proposed electric poles and supporting infrastructure to demonstrate that chosen technology and structures will be compatible with the surrounding land uses. (**0023-3-31** [LaFerrier, Marc])

Comment: Please provide a detailed description of the construction methodology that will be used to limit secondary impacts, especially along the linear infrastructure features. (**0023-3-52** [LaFerrier, Marc])

Comment: Potential impacts from the construction and operation of transmission lines and access roads in either the West Preferred or West Secondary Corridors include disruption of

hydrologic flows; wildlife and habitat disruption; wetland plant community destruction; reduction of native plant species populations; adverse effects on threatened and endangered species and migratory birds; introduction of non-native, invasive species; air and water pollution; noise; impacts to cultural resources, adverse impacts to viewsheds and wilderness character; and degradation of park visitor experiences. A cultural resources survey should be performed to identify cultural resources in the two corridors and measures to avoid and minimize potential impacts. (**0025-2-10** [Kimball, Dan] [Lewis, Mark])

Comment: The EIS should evaluate the direct, indirect and cumulative effects of the transmission lines and related facilities needed to connect Units 6 & 7 to FPL's electric transmission system. (**0025-2-5** [Kimball, Dan] [Lewis, Mark])

Comment: The Western Transmission Line Corridor includes two options, a West Preferred Corridor option and a West Secondary Corridor option. Either option would include the installation of two 500 kV transmission lines, one 230 kV transmission line and related towers, guy wires, ground wires, fill pads, and access roads. Both corridors are partially located within the boundaries of Everglades National Park Expansion Area as shown in Fig 9.4-13 of the COLA Environmental Report. (**0025-2-7** [Kimball, Dan] [Lewis, Mark])

Comment: The NPS is conducting a wilderness study for the 109,500 acre ENP Expansion Area. This study evaluates lands for possible recommendation to Congress for inclusion in the national wilderness preservation system as required by the Wilderness Act of 1964. Construction of transmission structures and access roads in the West Secondary Corridor would result in 320 acres of lands not being eligible for wilderness designation. FPL's West Preferred Corridor runs through lands within the Expansion Area that may also be eligible for wilderness designation. The eligibility of lands adjacent to either corridor would be adversely affected by introducing visible man-made structures (such as transmission facilities), and introducing noise (from construction/operation/maintenance activities) that would adversely affect opportunities for solitude. (**0025-3-37** [Kimball, Dan] [Lewis, Mark])

Comment: Kingston Square Condominium is located at 9300 -9430 SW 77th Avenue and our street is the preferred route for FPL to erect 80 -100 foot transmission lines of 230 volts. This is an outrage! Ours is a quiet residential street of homes, condominiums, a Baptist Church with orphanage, and small businesses. (**0031-2** [De Villiers, Elena])

Response: Environmental impacts associated with the planned new transmission corridors and roadways will be addressed in Chapters 4, 5, and 7 of the EIS, as will potential impacts associated with upgrades to the existing lines if required. The land-use impact analyses sections in Chapters 4, 5, and 7 will consider the compatibility of the proposed transmission lines and other offsite facilities with existing and proposed land uses in the affected areas and with land-use plans under consideration by State and local governments. The analyses will also consider potential impacts from the transmission lines and other offsite facilities on Everglades

National Park, Biscayne National Park, and other affected public lands. The impacts of power lines on human health will be addressed in Chapter 5.

Comment: FPL owns, and has owned since the 1960's and early 1970's, approximately 320 acres of undeveloped land within the Expansion Area (part of the West Secondary Corridor). Since the FPL Property is currently undeveloped and is needed for the restoration and enhancement of the ecosystem through improvement of natural hydrologic conditions, the NPS intends to acquire the FPL property and manage it as part of ENP and to maintain the FPL Property in its undeveloped natural condition. The NPS began negotiations with FPL in 1996 but to date the federal government and FPL have been unable to reach an agreement on the direct acquisition of FPL's property by the United States. (**0025-2-8** [Kimball, Dan] [Lewis, Mark])

Comment: As noted, in Section 9.4.3.1 of the COLA Environmental Report, the Omnibus Public Land Management Act of 2009 authorized the Secretary of the Interior to exchange 260 acres of NPS property within and along the eastern edge of the Expansion Area (part of FPL's West Preferred Corridor) for FPL's 320-acre property within the Expansion Area (part of FPL's West Secondary Corridor). The NPS lands being considered for exchange were acquired by the NPS for the purpose of restoring the hydrology and ecology of the park. The exchange decision is left to the Secretary's discretion subject to conditions necessary for protection of resources, equalization of land values and evaluation of potential environmental impacts pursuant to the National Environmental Policy Act (NEPA). The NPS is currently preparing an environmental assessment regarding the potential exchange. At the conclusion of the NEPA process, the NPS will decide whether to exchange lands with FPL or to acquire the FPL property by direct purchase/eminent domain. There are many uncertainties regarding the exchange, and it is not a foregone conclusion that the NPS will decide to exchange lands. An NPS decision to acquire FPL's property, rather than exchange lands, would result in neither corridor within the Park being available for placement of transmission lines. (0025-2-9 [Kimball, Dan] [Lewis, Mark])

Response: Potential land-use impacts of building and operating proposed Turkey Point Units 6 and 7 on the Everglades National Park, Biscayne National Park, and other parks and preserves, including impacts on wetlands within those areas and on threatened or endangered species, will be evaluated in Chapters 4, 5, and 7 of the EIS.

Comment: The applicant must provide details on what other parties are filing alternate transmission line corridors, along with an explanation of how the process for approving transmission line corridors differs, including but not limited to obligations of other parties to meet applicable Conditions in Z-56-07, when FPL is not the applicant. (**0023-3-19** [LaFerrier, Marc])

Comment: The map series showing the transmission corridor locations do not differentiate between existing rights-of-way/easements and areas proposed. (**0023-3-20** [LaFerrier, Marc])

Comment: Maps and narratives do not demonstrate existing rights-of-way or existing certified corridors along the proposed east and west transmission corridor alignments. (**0023-3-37** [LaFerrier, Marc])

Comment: Location of greenways/trails are not shown in map series showing preferred corridors or secondary corridors although the criteria in Tables W 9.3.1-4 and E 9.3.1-4 specifically state that the acquisition status of existing and proposed greenways was included in the Alternative Route Qualitative Evaluation Criteria. Please provide mapping of existing and proposed greenways. The Application does not address the Parks and Open Space System Master Plan prepared in compliance with Policy ROS-4 of the Recreation and Open Space Element of the CDMP and as approved by the Board of County Commissioners. (0023-3-62 [LaFerrier, Marc])

Comment: Materials provided are not sufficient to determine whether corridor alignments, construction techniques, and proposed pole designs will ensure protection of future inland wetlands, wellfield areas, and Natural Forest Communities from incompatible land use. (**0023-3-63** [LaFerrier, Marc])

Response: These comments refer specifically to the SCA submitted to the State of Florida by FPL, but they indicate an interest in the potential impacts of the proposed transmission lines. The review team will assess the potential impacts of the proposed transmission lines in Chapters 4 and 5, based on the affected environment described in Chapter 2.

Comment: 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. (**0022-1-6** [Reynolds, Laura])

Comment: 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. (**0022-1-7** [Reynolds, Laura])

Comment: 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 Pennsuco substation or the Levee substation in the future, including any cost-benefit analysis, please provide them. (**0022-4-5** [Reynolds, Laura])

Response: The potential impacts of building and operating proposed Turkey Point Units 6 and 7 and associated offsite facilities, including transmission lines, on the environment will be addressed in Chapters 4, 5, and 7 of the EIS, based on the affected environment described in Chapter 2. The EIS will include citations for documents used in its preparation.

Comment: We are limited in what we can do with underground lines, or overhead poles, or all of the things that are needed to get the transmission of the power to all of our communities. (**0001-25-5** [Horton, Richard])

Comment: Explore the alternatives of undergrounding and co-locating transmission lines with Metrorail. (**0019-10** [Hamilton, Karen])

Response: The environmental impacts of building and operating the proposed transmission lines will be addressed in Chapters 4, 5, and 7 of the EIS. However, the review team does not advise the applicant on alternative designs of transmission facilities; these decisions are made by the applicant and State regulatory bodies. Therefore, issues related to possible underground transmission lines would ordinarily not be addressed in the EIS. However, the Corps of Engineers, and perhaps the National Park Service, will be cooperating with the NRC on the EIS. To the extent that a cooperating agency addresses such alternatives for its NEPA analysis, those alternatives would likely be included in this EIS in order to support the cooperating agency's environmental review.

Comment: The SFWMD recommends that the following issues be addressed in the Environmental Impact Statement: Electrical Transmission Lines – The potential for the Preferred Corridors to adversely impact SFWMD-owned communications towers and radio matrix sites. In particular, the West Preferred Corridor is located very close to various SFWMD communications towers and radio matrix sites. Although FPL has indicated that they will work with the SFWMD to resolve any unlikely interference issues, they have not provided the SFWMD with adequate information to determine if or to what extent critical SFWMD-owned communications facilities may be impacted by the proposed transmission line facilities. The SFWMD advised FPL that it is unacceptable to wait until impacts have occurred to identify, design, permit, construct, and implement solutions, since this could substantially impact the SFWMD's ability to use these facilities to meet SFWMD flood protection and other critical emergency management responsibilities. (0032-22 [Golden, James])

Response: The impacts of operating proposed Turkey Point Units 6 and 7, including the impacts of the associated transmission lines, on community services, will be addressed in Chapter 5 of the EIS. The potential impact of transmission lines on radio signals used by local and regional agencies to perform their missions will be considered in preparing that chapter.

6. Comments Concerning Geology

Comment: 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. (**0022-1-14** [Reynolds, Laura])

Response: Available information about the fill source will be provided in Chapter 3 of the EIS. The potential impacts of obtaining fill material on water resources will be presented in Chapter 4 of the EIS, based on baseline information on the affected environment described in Chapter 2. The cumulative impacts of the actions proposed by FPL to build and operate proposed Turkey Point Units 6 and 7 along with other past, present, and reasonably foreseeable future actions will be presented in Chapter 7.

7. Comments Concerning Hydrology – Surface Water

Comment: And the one last thing I keep wondering about is, the nuclear power plants generate hot water; correct? What about desalinization, especially in areas like South Florida, to take that hot water and use it as part of a desalinization solution? (**0002-17-6** [Eney, Douglas])

Response: The impact of effluents discharged from proposed Turkey Point Units 6 and 7 on water resources and ecological resources will be discussed in Chapter 5 of the EIS. The NRC does not advise the applicant on alternative uses of waste heat from a power plant; these decisions are made by the applicant and State regulatory bodies. Therefore, the comment related to alternative use of waste heat will not be discussed in the EIS.

Comment: We also continue to be concerned about the saltwater intrusion into the Biscayne Bay that is being facilitated by the current cooling canals. The effects of the increased salinity are negatively impacting Biscayne Bay restoration efforts. (**0001-15-3** [Cornick, Lance])

Response: The review team will assess and discuss baseline water-quality conditions within the affected environment in Chapter 2 of the EIS. The team will assess the impacts of building and operating proposed Turkey Point Units 6 and 7 on water resources in Chapters 4 and 5, respectively. The cumulative impact of the proposed action and other past, present, and reasonably foreseeable actions that have the potential to affect water resources will be discussed in Chapter 7.

Comment: Water impact and the saltwater intrusion has been coming to Dade County -- I used to swim right there before the plant was built. I used to crab right there -- just south of there. I was a human bobber. My dad used to pull me behind the boat and used to go and dive and get crabs and all kind of fish. You don't see a lot of that now. But, is it the plant's fault? No. It's

because Dade County has gone from 100,000 people to 1 million 9, or whatever our current is. And that impact is going to continue. It's not the plant that's causing the problem. Our water situation, with that mitigation of fresh water flowing out to the ocean, now you're going to have saltwater coming in; it's not the plant's fault. (0002-12-4 [McHugh, John])

Response: This comment refers to changes in baseline water quality and aquatic ecology in Biscayne Bay in the vicinity of the proposed units. The review team will present baseline water-quality conditions within the affected environment in Chapter 2 of the EIS. Predicated on this information, the team will assess the impacts of the proposed action on water resources in Chapters 4 and 5 for building and operating proposed Turkey Point Units 6 and 7, respectively. The cumulative impact of the proposed action and other past, present, and reasonably foreseeable actions that have the potential to affect water resources will be discussed in Chapter 7.

Comment: Growing up in Florida I have seen firsthand our issue with water consumption and lack of water. Lately, reports of clean water becoming scarce is an issue being talked about by many world leaders. Half of the world's schools do not have access to clean water and 1.5 billion people do not have access to clean water either. We're taking water, one of our most precious natural resources, for granted by consuming so much through nuclear energy. Conserving water and our incredible ecosystems in Florida should be a main priority and a main influence for FP&L decisions. Nuclear power is very water-intensive and we'll only have problems in the future. It is not efficient as other options that Florida should be considering, such as solar and wind. (0001-19-2 [Ryan, Megan])

Comment: But we also need to consider that the water they're going to be using, the 90 million gallons of water that they want to use to cool these plants, is about one-third of our grey water, and there are other alternatives that we could use for that. We could be using irrigation and other areas rather than just turning it over to FP&L. So I want them to consider the use of the water along with the impact it will have on the development of the US-1 quarter. (**0002-2-3** [Meerbott, Tim])

Comment: As a result, we request that the scoping that you're providing in the EIS present a very high level of detail in the water resource mass balance of both the hydrology and the water chemistries that we have in South Dade County to prohibit any negative impacts. We already have enough negative impacts, and last year was a good example. We had a drought that brought the surface water of the Biscayne aquifer down to zero, and as you know we can't keep it at zero too long with the saltwater head pushing inland. So, we need to do everything we can to protect our water resources and our water supply for our citizens. (0002-3-4 [Walker, Tom])

Comment: What are the cumulative effects of radial collector wells on water conditions in Biscayne Bay, including salinity, flushing, clarity, water quality, localized temperatures, etc.?

Further, what are the anticipated effects at increments of 25%, 50% and 100% of full implementation of this proposal? (**0018-12** [Poole, Mary Ann])

Comment: <u>Radial Collector Wells</u>: The application does not provide enough information on this technology and the current conditions at the locations of the radial collector wells for us to assess whether their construction or operation would have an impact on fish and wildlife resources. We wish to point out the highest priority for recovering the ecosystem health of Biscayne Bay is on addressing the negative impacts that water resource development and water management have had on the salinity regime of the Bay and its associated coastal wetlands, which provide important habitat for fish and wildlife resources. If radial collector wells, which are vertical wells that then discharge laterally via a series of pipes underground, would disrupt the groundwater system, which is closely tied to surface water (which in turn supports fish and wildlife resources) in this extremely porous karst area, this proposal would seem to be contrary to commitments made by the Governor's Office and U.S. Congress, which signed into law authorizations to restore Biscayne Bay (Water Resources Development Act of 2000 -see http://www.fws.gov/habitatconservation/omnibus/wrda2000. pdf). (0018-7 [Poole, Mary Ann])</u>

Comment: Whether the extraction of water from the Biscayne Bay system will change or reduce the freshwater inflow to the bay and/or increase salinity at least seasonally shall be examined through additional modeling as part of the application. (**0023-1-48** [LaFerrier, Marc])

Response: The review team will assess the impacts of building and operating proposed Turkey Point Units 6 and 7 on the water quantity and quality of both local and regional water resources and identify mitigation measures proposed by the applicant to reduce adverse impacts. This assessment will consider current and future conditions, including changes in water demands to serve the needs of the future population, and changes in water supply. The review team will present baseline water quality conditions in the environment around the proposed site in Chapter 2 of the EIS. The impacts of building and operating the proposed units on water resources will be presented in Chapters 4 and 5 of the EIS, respectively. Cumulative water-use impacts will be addressed in Chapter 7 and cooling-water alternatives in Chapter 9.

Comment: Florida Power and Light refers to plans to fill at least 70 acres of existing wetlands in the Miami Dade region surrounding Turkey Point. This fill could have devastating impacts on the surrounding environment and economy, as it would eliminate 70 acres of existing flood water storage during intense rainfall or hurricane. Filled wetlands can cause both on-site and off-site flooding [2], damaging the plant itself on property owned by Florida Power and Light, and also causing possible devastating damage to the surrounding communities, even possible loss of life. (0007-6 [Burris, Jessica])

Response: The environmental impacts of building and operating proposed Turkey Point Units 6 and 7, including the infilling of wetlands, on local hydrology and terrestrial ecology will be

evaluated in Chapters 4 and 5 of the EIS. Safety issues related to potential floods are outside the scope of the environmental review, but will be evaluated by the NRC staff in its SER.

Comment: If the scientists are correct, and they keep moving that global warming -- not global warming, but global sea level change up more and more because the glaciers of Greenland, of Antarctica, are melting. They are melting. You don't have to believe it or not. Look at the photos and look at it, look at the measurements and look at it. (**0002-14-14** [Schwartz, Matthew])

Comment: Sea level rise is a real and ongoing interesting element that we haven't had to deal with before that is going to be causing major challenges to our infrastructure. We would hope that FPL's proposed facility do not add any unintended consequences by moving millions of tons of dirt and moving waters around that could increase the potential impacts as a result of the already impacting sea level rise. (0002-3-6 [Walker, Tom])

Comment: [L]ook 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. (0015-6 [Espinosa, Carlos])

Comment: A further 2-foot sea level rise by the end of the century, as projected in the 2001 IPCC report, would make life in south Florida very difficult for everyone. Spring high tides would be +4.5 to 5 feet above present mean sea level 3 q; storm surges would be higher; barrier islands, fill islands and low-lying mainland areas would be frequently flooded; salt water intrusion would restrict available freshwater resources; drainage would be more sluggish; Turkey Point would be an offshore island; and so on. (**0016-9** [White, Barry])

Comment: Please state all the projections for sea level rise used by the NRC. (**0022-1-4** [Reynolds, Laura])

Comment: No identification of sea level rise projections used to model the water management project provided. (**0023-3-59** [LaFerrier, Marc])

Comment: Other specific issues NMFS recommends for evaluation in the EIS or EFH assessment: 5. *Sea level rise*. Please include information in the EIS that evaluates potential seal level rise scenarios and how the project is being designed to mitigate these effects. (0033-13 [Croom, Miles])

Response: The review team will assess the impacts of building and operating proposed Turkey Point Units 6 and 7 on local and regional water resources and aquatic and terrestrial ecology. This assessment will consider both current and future conditions that affect the environment including sea level rise and mitigation measures identified by the applicant that could reduce adverse impacts. Impacts on water and ecological resources from building and operating the units will be discussed in EIS Chapters 4 and 5, respectively. Cumulative impacts will be addressed in Chapter 7 and plant design alternatives in Chapter 9. The period of consideration for environmental impacts is over the 40 year license period; under the NRC's environmental protection regulations (Title 10 of the Code of Federal Regulations [CFR] Part 51), which implement Section 102(2) of the National Environmental Policy Act of 1969, as amended (NEPA), if renewal of the operating license is requested, preparation of an EIS would again be required. Because license renewal is not certain to occur (or even to be requested), to include that extended period for environmental impacts would be speculative and outside the bounds of NEPA. Therefore, the assertion that the time period for projection of future considerations should include a second operational period is out of scope for this EIS.

Comment: 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. (0022-2-19 [Reynolds, Laura])

Comment: The application does not provide a description of the specific upgrades FPL proposes to satisfy this condition. A complete and detailed description shall be provided. In addition, FPL shall describe what sheet flow improvements, if any, are proposed within transmission corridors for which mitigation lift is being sought. (**0023-3-26** [LaFerrier, Marc])

Comment: Please resolve the apparent conflict between this condition and the stated intent to install roads in the transmission line corridors where no impediments to sheetflow currently exist, such as the portion of the West transmission corridor in Section 31 T57S R39E. (**0023-3-27** [LaFerrier, Marc])

Comment: The construction of proposed access roads to the new reactor facility will also impact the Biscayne Bay Coastal Wetlands Project by altering sheet flow that is important to the success of the Project. (**0025-2-17** [Kimball, Dan] [Lewis, Mark])

Comment: The SFWMD recommends that the following issues be addressed in the Environmental Impact Statement: Electrical Transmission Lines – The potential for adverse impacts to existing wetland slough systems, located within the vicinity of U.S. Highway 1, from new and/or improved fill roads associated with the West Preferred Corridor. East of U.S. 1, under the CERP Biscayne Bay Coastal Wetlands Project, additional surface water flows are to

be diverted southward, through existing wetland slough systems in this area, to hydrate wetlands to the south, including wetlands in the SFWMD's Model Lands Basin area, and possibly the SFWMD's Southern Glades Basin area. The SFWMD is a partner with the USACE in this project. Even if culverts are installed, they are very poor at maintaining low head flows (i.e., sheetflow). West of U.S. 1, the corridor crosses the SFWMD's Southern Glades Save Our Rivers Parcel GR701-025. (0032-23 [Golden, James])

Comment: The SFWMD recommends that the following issues be addressed in the Environmental Impact Statement: Electrical Transmission Lines – Regarding Water Conservation Area 3B, there are potential impacts related to the construction, operation, and maintenance of the proposed transmission line with respect to the SFWMD's legally mandated responsibilities for managing its lands within Water Conservation Area 3B. These lands were specifically acquired for water management-related purposes (i.e., flood control, water supply, conservation, reclamation, and other allied purposes) and are managed by the SFWMD and other agencies, including the U.S. Fish and Wildlife Service and the Florida Fish and Wildlife Conservation Commission, through special agreements for those purposes. (**0032-26** [Golden, James])

Response: The review team's assessment of the impacts of building proposed Turkey Point Units 6 and 7 on the environment, including impacts on sheetflow associated with building roads, transmission lines, and other linear features, will be presented in Chapter 4 of the EIS. Cumulative impacts will be addressed in Chapter 7. The EIS will include citations for documents used in its preparation.

Comment: Simulation should cover, at a minimum, the area bounded by SW 344th St in the north, Old Card Sound Road in the west, and the coastline in the south and east. The EPA-SWMM and XP-SWMM are recommended models to simulate the variety of structures within the area, in order to obtain hydrographs and pollutographs at selected points. The model should also simulate contaminant transport and dilution effect. Event simulations should be run to obtain the conditions before and after the proposed development, including the new inflow and loads from the proposed Administrative/Training Buildings, Parking area, and Reclaimed Water Treatment Facility. (0023-1-13 [LaFerrier, Marc])

Response: This comment refers specifically to the SCA submitted to the State of Florida by FPL, but it indicates an interest in the potential impacts of the building of the proposed units on local and regional water supply and water quality. Modeling data provided by the applicant will be reviewed and evaluated in the course of the development of the assessment. The assessment of the impacts on water resources from building proposed Turkey Point Units 6 and 7 will be presented in Chapter 4 of the EIS, based on information describing the affected environment in Chapter 2.

Comment: Please provide drainage plans and associated calculations for the proposed access roads. (0023-2-20 [LaFerrier, Marc])

Comment: The mitigation plan proposes to discharge wastewater into the Model Lands and to seek mitigation credit for this discharge. Since the area proposed for discharge is a sawgrass wetland, pollutant levels, including but not limited to nutrient levels, would need to be very low (e.g. less than 10 ppb phosphorous). The application, however, provides insufficient information on the treatment methodology, the resulting quality, volume, and timing of the discharge. The applicant shall provide complete and detailed water quality information for the proposed discharge water that is sufficient to determine whether the water quality of the proposed discharge water is sufficient to prevent degradation of the receiving wetlands. (**0023-3-43** [LaFerrier, Marc])

Comment: In order to have hydrologic improvements, with the exception of reclaimed water, water must be captured or diverted from other areas. Please describe in detail how the redirection of water will affect those donor areas, such as Biscayne Bay. Is there a loss of function from some areas associated with the diversion of water for the proposed hydrologic improvements? (**0023-4-1** [LaFerrier, Marc])

Comment: [T]he application does not provide sufficient information to evaluate the impact of these discharges on water quality of adjacent surface. (**0023-4-11** [LaFerrier, Marc])

Response: These comments refer specifically to the SCA submitted to the State of Florida by FPL, but they indicate an interest in the potential impacts of the operation of proposed Turkey Point Units 6 and 7 on water availability, water quality, and terrestrial ecology. The review team's assessment of impacts on local and regional water resources and terrestrial ecology from building the proposed units will be presented in Chapter 4 of the EIS. Impacts from operation of the proposed units will be presented in Chapter 5. Cumulative impacts will be addressed in Chapter 7 and plant effluent discharge alternatives in Chapter 9.

Comment: 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. (**0022-1-8** [Reynolds, Laura])

Comment: [T]he COL proposes the use of tertiary treated wastewater as the primary cooling water supply source for Units 6&7. Biscayne Bay is designated an Outstanding Florida Water and as such has a no degradation standard. The use of tertiary treated wastewater for cooling water would indirectly introduce PPCPs, surfactants, biocides, and EDCs into southern Biscayne Bay that were not present at the time of designation. (**0025-2-4** [Kimball, Dan] [Lewis, Mark])

Response: These comments refer to the impacts of using treated wastewater as the primary cooling water supply for proposed Turkey Point Units 6 and 7. The impacts of the proposed units on local and regional water resources, including impacts related to using reclaimed water on water quality in Biscayne Bay, will be presented in Chapter 5 of the EIS, based on information describing the affected environment in Chapter 2 and plant design and operations discussed in Chapter 3. The EIS will include citations for documents used in its preparation.

Comment: A lot has changed since this facility was originally sited here. You are about to undertake an analysis of a proposal to place two nuclear reactors on the shores of a bay that is the subject of a major Federal multi-billion dollar restoration project. The nature of the impacts that this project will have; water consumption, wetland loss that is sort of off the charts in terms of modern wetland permitting in Southeast Florida; habitat loss; impacts to hydrology in the way water moves, are the types of impacts that that multi-billion dollar Federal project is trying to reverse. And so the notion of coming in and bringing about water use impacts, that are unlike anything else known in South Florida, and wetland impacts that are kind of off the charts, just fundamentally is a major problem and doesn't really add up. The exacerbation of things that one arm of the Federal Government is trying to fix, doesn't make sense in the modern world. (**002-6-1** [Grosso, Richard])

Comment: Will this project potentially interfere with the goals of the Biscayne Bay Coastal Wetlands Project (BBCW)? Please indicate how the applicant is coordinating with the BBCW team to ensure that the use of the radial collector wells will not hinder the success of the BBCW project. (**0018-11** [Poole, Mary Ann])

Comment: The application predicts the potential for additional salinization throughout the area as a result of the project by drawing salty water landward via the radial collector wells and from deposition of salts as a result of cooling tower operations. In contrast, the CERP BBCW project seeks to reduce salinity levels in and adjacent to Biscayne Bay to restore more natural estuarine conditions. No documentation is provided to examine the specific impacts to the area from additional salinization generally and for CERP consistency specifically. A study is needed that includes a salt budget and an examination of the cumulative effects of existing and proposed operations at Turkey Point including but not limited to the existing chloride plume created by the cooling canal system and the additional salts that would be added to the area as a result of the proposed project. The study shall also be sufficient to determine the extent to which the radial collector wells would capture, redirect, or otherwise affect groundwater from the existing plume emanating from FPL's Cooling Canal System. (0023-3-39 [LaFerrier, Marc])

Comment: Narrative description of the timing and the approval process of the FPL water management project and the Alternative "O" CERP project, to ensure that both can and will likely be accomplished. Analysis by FPL, with cooperation from the SFWMD, on whether the incorporation of the water management project into the CERP process will alter or jeopardize the potential approval and funding of the CERP project not provided. (**0023-3-60** [LaFerrier, Marc])

Comment: The groundwater modeling is currently insufficient to effectively simulate impacts to the bay, or even to determine the percentage of fresh water from the aquifer, which would be removed from the ecosystem by the RCWs. Until it can be satisfactorily determined that the RCW system will not remove aquifer water, this plan appears to conflict with the CERP Biscayne Bay Coastal Wetlands project. (**0025-2-15** [Kimball, Dan] [Lewis, Mark])

Comment: Construction of infrastructure associated with transmission lines and access roads in either corridor would result in the permanent filling of over 100 acres of wetlands. Direct and indirect effects of filling need to be included in the evaluation of impacts resulting from this project. In particular, installation of additional access roads in either corridor would create new barriers to flow in a critical portion of northeast Shark River Slough. This area is a focal point of Modified Water Deliveries (MWD) and CERP restoration projects designed to restore natural flow to that area. In addition, modification of the existing L-31 N levee in the western preferred corridor to provide access to proposed transmission lines would create an impediment to the natural north to south flow of water in the area. Access roads, even if culverted, will result in reduction of surface water flow critical to maintenance of ENP wetlands. This is in direct conflict with one of the critical components of hydrological restoration under CERP. The impacts of this flow reduction on park wetland resources and on MWD and CERP restoration projects that are underway or planned needs to be evaluated. (**0025-3-35** [Kimball, Dan] [Lewis, Mark])

Comment: Construction, maintenance and vegetation management in either transmission line corridor identified by FPL would result in impacts to ENP water quality through soil disturbance and/or the introduction of chemical pesticides. These impacts need to be evaluated. (**0025-3-36** [Kimball, Dan] [Lewis, Mark])

Comment: The SFWMD recommends that the following issues be addressed in the Environmental Impact Statement: Radial Wells and Construction Dewatering Withdrawals at Power Plant Site – The potential for the proposed withdrawals to adversely impact the CERP Biscayne Bay Coastal Wetlands project. (**0032-10** [Golden, James])

Comment: Proposed Project may result in adverse impacts to: The Biscayne Bay Coastal Wetlands CERP Project -This project will replace lost overland fresh water flow and partially compensate for the reduction in groundwater seepage by redistributing, through a spreader system, available surface water entering the area from regional canals. The goal of this project is to improve the ecological health of Biscayne Bay (including freshwater wetlands, tidal creeks and near-shore habitat) by adjusting the quantity, quality, timing, and distribution of freshwater entering Biscayne Bay and Biscayne National Park. Redistribution of freshwater flow and the expansion and restoration of wetlands will help to restore or enhance freshwater wetlands, tidal wetlands, and near shore bay habitat. The project, located in southeastern Miami-Dade County, includes pump stations, spreader swales, stormwater treatment areas, flowways, levees, culverts, and backfilled canals. The project covers 13,600 acres along the L-31 E Canal. The purpose of the project is to capture, treat, and redistribute freshwater runoff from the watershed

going into Biscayne Bay, creating more natural water deliveries and expanding the spatial extent and connectivity of coastal wetlands and improving recreational opportunities. (**0032-2** [Golden, James])

Comment: Proposed Project may result in adverse impacts to: The L31 N (L-30) Seepage Management Pilot CERP Project -This project, located along a portion of the L-30 levee north of U.S. Highway 41 in Miami-Dade County, will help resolve critical uncertainties associated with seepage management, including the characterization of the Biscayne aquifer hydrodynamics, constructability in south Florida geology, reliability of materials and technologies, feasibility of implementing a seasonally flexible operating system, appropriateness of monitoring to evaluate effects on seepage, and cost and time requirements necessary for implementation. The recommended plan will test two structural seepage reduction technologies (steel sheet pile and slurry wall), and will test the ability to seasonally manage seepage flows through pumping operations with the use of extraction and injection wells. Field tests, seepage reports, and historical data independently show that this is one of the most transmissive parts of the Biscayne aquifer. (0032-3 [Golden, James])

Comment: Provide assurance that the proposed roadway improvements will be designed to be compatible with CERP Biscayne Bay Coastal Wetlands Project Alternative "O". The amendment does not demonstrate how the proposed roadway improvements will be designed to be compatible with CERP Biscayne Bay Coastal Wetlands Project Alternative O. Under Alternative O, additional surface water flow :(sheetflow) is to be diverted southward, through existing wetland slough systems, into environmentally sensitive lands located south of Palm Drive (S.W. 344th Street), generally between the District's L-31E Canal and U.S. Highway 1. Under this amendment, several new roadway improvements are proposed that could interfere with the proposed sheetflow. Prior, to adoption, the amendment should be revised to include policies, strategies, and commitments to ensure that the appropriate engineering analyses are conducted and any proposed drainage features, including culverts, be designed, sized, and spaced to handle existing and proposed flows. (0032-34 [Golden, James])

Comment: Proposed Project may result in adverse impacts to: The South Dade C-111 Project and Modified Water Delivery Project to Everglades National Park (Modwaters) -This project will modify the existing water management infrastructure to improve water deliveries to Everglades National Park (ENP). Changes are being made to Water Conservation Area 3A/3B levees and canals to redirect water flow into Northeast Shark River Slough in and around the proposed new Florida Power and Light (FPL) Turkey Point Units 6 & 7 transmission line corridors. Current water management actions focus on re-establishing sheet flow into ENP by removing barriers such as the Tamiami Trail road and replacing it with a bridge. Future water management changes will increase the volume of water introduced and distributed into Northeast Shark River Slough. Additional changes are being implemented along the Lower C-1 11 Canal to promote rehydration of Taylor Slough and northern Florida Bay in the southern limits of ENP. A series of

detention areas are being constructed west of the L31N Canal to provide storm water detention and create a hydrologic barrier between the managed canal levels and the Everglades marsh. Water levels will be managed at higher levels within the detention areas to create a positive hydrologic head and reduce seepage from ENP. (**0032-4** [Golden, James])

Comment: Proposed Project may result in adverse impacts to: Decompartmentalization of Water Conservation Area 3A/3B -This is a CERP project and a companion to the South Dade C-1 11/Modwaters Project promoting removal of existing levees and canals impacting sheet flow into ENP. Future changes include removal of existing canals, levees, and structures separating WCA 3A/3B and ENP, such as removal of the Miami Canal within WCA 3A, removal of the L-67A/C levee segments, and additional bridging of Tamiami Trail together with the removal of the L-29 containment levee. (0032-5 [Golden, James])

Comment: In addition to the potential for significant adverse impacts to specific restoration projects, the SFWMD is concerned about the potential for significant adverse impacts that relate to its overall mission to manage the water resources of the State located within the SFWMD's geographic boundaries. (0032-6 [Golden, James])

Comment: Other specific issues NMFS recommends for evaluation in the EIS or EFH assessment: 4. *Biscayne Bay Coastal Wetlands (BBCW)*. Please describe any potential conflicts this project may have with the restoration goals of BBCW. Please indicate how FPL and NRC are working with the BBCW team to ensure that any expansion at Turkey Point will not hinder the success of the BBCW project. (0033-12 [Croom, Miles])

Response: These comments refer to interactions between the proposed action and regional projects, including CERP projects. The review team will assess the impact of proposed Turkey Point Units 6 and 7 on local and regional water resources and aquatic and terrestrial ecology. Assessment of the impacts of building and operating the proposed units on water quality and ecological resources will be presented in Chapters 4 and 5 of the EIS, respectively. Cumulative impacts, including interactions with CERP and other restoration efforts, will be addressed in Chapter 7.

Comment: The SFWMD recommends that the following issues be addressed in the Environmental Impact Statement: Additional Construction Impacts at Power Plant Site – The potential for adverse impacts to Biscayne Bay associated with the proposed barge canal dredging. (**0032-13** [Golden, James])

Response: The impacts of the proposed action on hydrology and water quality in Biscayne Bay, specifically the impacts related to dredging of the barge canal (barge-turning basin and barge-unloading area), will be presented in Chapter 4 of the EIS. The impact assessment in Chapter 4 will be based on information describing the affected environment in Chapter 2 and plant design and operations discussed in Chapter 3. **Comment:** The NRC needs to acknowledge that this area is an extremely sensitive hydrological environment. The history of the Everglades and the current costly restoration projects illustrate the long-term shortsightedness that has scarred Florida's waterways. (**0001-14-6** [Hancock, Mandy])

Comment: The new reactors will require more fresh water for cooling and there's already a shortage of water in the natural system. So, although the comprehensive Everglades Restoration Plan plans to provide reused water to help restore Biscayne Bay, the two new reactors would require additional water as well. This plan puts Florida Power and Light development in competition with Everglades Restoration and we think restoration has had enough competition already. (**0001-15-2** [Cornick, Lance])

Comment: The water use is massive. Biscayne Bay restoration is all about fixing the problem that we don't get enough fresh water into the bay anymore. So the notion that you would add this type of fresh water consumptive use right there at that same location, is incredibly troubling. We haven't figured out how we're going to get the amount of fresh water back into the bay that we need to make it work again. This water demand could absolutely preclude ever getting that done. (**0002-6-2** [Grosso, Richard])

Comment: Sixty billion gallons of water is the last statistic that I heard that would be needed per day. That's way too much water. And I also heard that it would be warmer after use, going into the cooling and going back into our water. And just a small degree change can definitely affect all of our wetlands and things here. (0002-8-5 [O'Katy, Jessica])

Comment: [T]he new nuclear power plants will require more than ninety million gallons of fresh water a day to cool the reactors, causing severe problems to the already water restricted Southeast Florida. (0012-10 [Payne, Nkenga])

Comment: THERE IS NOT ENOUGH WATER IN THE AREA TO SUPPORT TP 6&7! (**0016-11** [White, Barry])

Comment: The required amounts of water needed to operate the reactors is beyond the capability of the water supply in South Florida. I am presently restricted from certain water use. What will be my future if these reactors are allowed to be built? How much potable water will be needed to support the doubling of the plant without the reactors? (**0027-5** [Moses, Dorothy])

Response: The impacts of building and operating proposed Turkey Point Units 6 and 7 on consumptive water use and cooling water discharge for both local and regional water resources will be presented in Chapters 4 and 5 of the EIS. Cumulative water-use impacts will be addressed in Chapter 7 and cooling water alternatives in Chapter 9.

Comment: Table 4.6-1 states that occasional surface water overflow/run-off from deep well injection wells would be directed to the Cooling Canal System. This would cause infiltration of wastewater constituents, including EPOCs, to the Biscayne Aquifer and subsequently to Biscayne Bay via subsurface flow. Wastewater migration to the bay would negatively impact the flora and fauna of the nearshore habitat due to the release of nutrient and microconstituents (i.e., EPOCs), which requires further consideration. (**0025-3-15** [Kimball, Dan] [Lewis, Mark])

Response: Table 4.6-1 indicates "The deep injection wells and the required monitoring wells would be installed in accordance with an FDEP injection well permit and any local permit requirements. During the construction of the injection wells and associated equipment, any surface water runoff would be directed to the cooling canals of the industrial wastewater facility." During construction, waste water constituents will not be present at the well sites and so would not be discharged to the Cooling Canal System. The impacts of constructing the injection wells will be presented in Chapter 4 of the EIS.

8. Comments Concerning Hydrology – Groundwater

Comment: As Mayor of the Village of Pinecrest and a former legislator, when I did serve in the House of Representative in the Florida Legislature, I had an opportunity to learn about and really come to grips with some of the potential for contamination and impact on the Floridan aquifer and the Biscayne aquifer, and I've been very attentive to that ever since, the concept of placing deep well injection. And back in the year 2001, there was an effort by the State and the Legislature and the Water Management Districts, to inject untreated storm water into the aquifer, and that actually passed the Florida Senate. We had to go back and undo it and we killed that legislation. I have been very involved in supporting the sustainability and the comprehensive Everglades Restoration Project ever since. (0001-21-2 [Lerner, Cindy])

Comment: And what will 70 million gallons of hot water do each day that they will have to get rid of? Where do you put 70 million gallons of water each day? You can't pump it down into the same place you're getting your cooling water from. If they got their cooling water from the sewage treatment plant then they would want to dump the hot water down into the boulder zone. Nobody has any idea what that would mean. We know that with sewage we pump way down deep into there offshore is now coming back up in Biscayne Bay and elsewhere. Also, that hot water is slightly radioactive. (0001-6-6 [Miller, Lloyd])

Comment: FPL proposes to inject 40 million gallons a day of waste in the boulder zone, a layer of the lower Floridan aquifer. And we are -- as the previous speaker mentioned, we are really unclear what the effects of this might be. (0001-7-10 [MacLaren, Kaitlin])

Comment: Please state the amount of waste seepage, by volume, into drinking water aquifers from deep well injection for units 6&7. (**0022-2-13** [Reynolds, Laura])

Comment: 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. (**0022-2-8** [Reynolds, Laura])

Comment: 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. (**0022-2-9** [Reynolds, Laura])

Comment: 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. (**0022-4-6** [Reynolds, Laura])

Comment: 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. (**0022-4-7** [Reynolds, Laura])

Comment: The application does not address any proposed treatment of biocide additive in the cooling waters, and how biocides are removed before reinjection into the proposed deep wells. (**0023-1-15** [LaFerrier, Marc])

Comment: Given the high evaporation rate, the concentrations of the analytes leaving the cooling tower system will be significantly higher that the concentration of those analytes entering the system. Considering that the final discharge point of the cooling system blowdown water is proposed to be the boulder zone (via underground injection wells), projected water quality characteristics for the blowdown must be provided. (**0023-1-7** [LaFerrier, Marc])

Comment: The application proposes the discharges of industrial wastes from several sources to injection wells. No information was provided to ascertain compliance with the applicable discharge standards. No information was provided to show that no treatment is necessary or that contamination will not result from such discharges. (**0023-1-9** [LaFerrier, Marc])

Comment: The primary source of cooling water is supposedly reclaimed water from Miami-Dade Water & Sewer Authority. The daily flow rate for cooling is supposedly 60mgd. The EIS should confirm that the cooling water concentrate from the reclaimed water source will be disposed of in the boulder zone through a class one deep injection well. Similarly, if the Floridian Aquifer water is used for cooling, concentrated brine reject should be disposed of in the boulder zone. (**0024-6** [Walker, Tom])

Comment: Current hydrologic knowledge regarding underground injection into the Boulder Zone suggests that the porosity and permeability in the Floridan can vary greatly depending on the location and formation. A history of dual zone groundwater monitoring results from the Miami-Dade County South District Wastewater Treatment Plant shows evidence of wastewater contaminant migration into the Upper Floridan. Upon the submittal of the pending USGS groundwater underground injection investigation for this region, it may be soon proven that the geology of the injection zone is incapable of confining the volume of injected sewage. These same concerns seem applicable to this project and the very large amount of discharged fluids intended to be injected. The Upper Floridan supplies make-up cooling water for existing Unit 5. Based on the above discussion, a similar breach of the Boulder Zone is possible and would compromise the water supply quality of Unit 5. (**0025-3-21** [Kimball, Dan] [Lewis, Mark])

Comment: An even more frightening scenario is FPL's intention of using injection wells for radioactive wastewater. I do not believe this has ever been done before. Can the NRC guarantee these waters will not percolate back up into our water supply or into our coral reefs or marine environments or national parks or my backyard? Does anyone know with complete certainty where this radioactive waste may end up? (**0027-7** [Moses, Dorothy])

Response: The impacts on the Biscayne and Floridan Aquifers from deep well injection to the Boulder Zone will be assessed by the team and discussed in Chapter 5 of the EIS. The cumulative impacts of the proposed injection and other past, present, and reasonably foreseeable actions will be presented in Chapter 7.

Comment: Secretary of Interior, Stewart Udall, took the federal court -- took FPL to federal court and forced them to construct an enormous cooling canal system, closed circuit cooling canal system. It's so big it can be seen from space. And it now contains super saline water and it has now penetrated and started to move in toward the farmlands and the tree farms. (0001-6-3 [Miller, Lloyd])

Comment: The Draft EIS should disclose/summarize results from all recent hydrologic studies and on-going assessments of the existing cooling canal system being utilized by Florida Power & Light Company's (FPL) for Turkey Point. EPA has met with National Park Service (NPS) officials from the Biscayne National Park regarding their concerns with the existing cooling canal system and its contribution to salt water intrusion in the South Miami-Dade area. NPS is concerned that the planned increased electric output from the existing units and the construction of two new nuclear reactors may exacerbate the salt water intrusion. This has raised concerns about adversely affecting local potable water supplies and the on-going Everglades restoration efforts. (0014-5 [Mueller, Heinz])

Comment: The Draft EIS should address concerns by agencies that the canal system has created a very warm and "hypersaline" water that sinks and spreads into the Biscayne Aquifer below. (0014-6 [Mueller, Heinz])

Comment: Water quality data summarized in Table 3.3.4-2 is not sufficient to fully assess the hydrologic characteristics of the cooling canal system. Cooling canal system is complex hydrology and includes interaction with Bay and groundwater (Section 3.3.2.1), and as such may have temporal and spatial variability. (**0023-1-67** [LaFerrier, Marc])

Comment: Data indicate that migration of the cooling canal system water is impacting adjoining surface and groundwater in the vicinity of the cooling canal system. (**0023-4-10** [LaFerrier, Marc])

Comment: [The Florida Keys Aqueduct Authority has] concerns for any potential impacts to our water supply. As the proposed project is significant in size and nature, conducting a comprehensive EIS to address key concerns and impacts to the natural resources is a necessary part of the evaluation process. It is our understanding that FPL's existing cooling water canal system, located west and south of the power plant contains high salinity concentrations. This high salinity is derived from evaporation of natural sea water discharged within these cooling water canals. As the highly concentrated seawater enters the groundwater along the bottom and the sides of the canals, the receiving groundwater becomes more saline. Without adequately operating system controls, this hydrogeological process can continue with a resultant salt load into a fresher groundwater aquifer. The higher saline groundwater with a higher specific gravity can increase the rate and amount of salt water intrusion from east to west in the Biscayne Aquifer and toward the FKAA wellfield. (**0024-1** [Walker, Tom])

Response: The impacts of the cooling canals of the existing Turkey Point units on groundwater near the plant are in general outside the scope of the current EIS, which will assess the impact of building and operating proposed Turkey Point Units 6 and 7. To the extent that the building and operation of the proposed units interact with the cooling canals, the building impacts will be presented in Chapter 4 and the operations impacts will be presented in Chapter 5 of the EIS. The cumulative impacts of the proposed units and the existing units, to the extent that they impact the same resources, will be presented in Chapter 7.

Comment: We have an impact for water, we have an impact for saltwater intrusion. But don't we have that naturally? (**0002-12-1** [McHugh, John])

Comment: When I moved out to my house -- I live west of Krome Avenue -- I could drink the water right out of my well, and that was fine for over 20 years. And then about 10 years ago they decide -- I used to have 4 houses to my block, okay, about 1 square mile. Now I have about 50 or 60 houses to my block. My water supply is not the same now. The quality of water is not the same as it was 10 years ago before those houses were built. See? And it's not any difference except now there's 40 or 50 more people in the area drawing off that same aquifer that there was only 4 before. (0002-12-6 [McHugh, John])

Comment: The agriculture out there uses massive amounts of water. Okay. When I lived out there for 20 years agriculture used massive amounts of water. We didn't have bad quality of water. Okay. The water was there, it was used, reached right under the ground. (**0002-12-9** [McHugh, John])

Response: The impacts of saltwater intrusion on baseline water quality in the vicinity of the proposed plant will be discussed in Chapter 2 of the EIS. The impacts of the proposed action on water resources will be discussed in Chapters 4 and 5 for building and operating the units, respectively. Projects that have the potential to interact cumulatively with the operations of the proposed units and affect water resources will be discussed in Chapter 7.

Comment: The Florida Keys primary water supply comes from a well field that is within ten miles of the proposed project. That's the well field itself. The actual aquifer that draws water into the well field is all around where we are. It's a very open, porous, surficial aquifer that's very vulnerable, very sensitive to wants and needs and with water chemistry in and about the land uses in South Dade County. Not just our well fields, there's well fields for Florida City, Homestead, and many other private and public systems in South Dade County that are within this region, some closer, some further away than ours, to the proposed project. (0002-3-1 [Walker, Tom])

Comment: Saltwater intrusion is a real issue to the Biscayne aquifer. We've seen the saltwater front line move over time inland. We have a huge number of monitoring wells as sentinels to help keep an eye and monitor the chemistries in the Biscayne aquifer. We have seen the intrusion exacerbated by existing operation at the existing FPL facility. One of the prior speakers mentioned high density saline water from the cooling canals. And that's been studied to some degree, however, the transparency of seeing the data is not as good as we would like from the applicant. (0002-3-2 [Walker, Tom])

Comment: We understand also that the proposal included potentially huge amounts of borrow excavation in and around the facility. Also, a huge amount of reclaimed water to be used as cooling. Both of these elements are going to change potentially the hydrology and the water chemistry in and around the area. (**0002-3-3** [Walker, Tom])

Comment: And the final point I'll make is about saltwater impacts. One aspect of Everglades and Biscayne Bay restoration is about ecology. The other aspect is about South Florida's drinking water supply. We've had major drinking water crises. We've had development moratoriums because of a lack of drinking water. Saltwater intrusion is a major problem. Saltwater intrusion, if it contaminates drinking water is not just an environmental problem, but it's a sound growth into the future development problem for South Florida. It's not a risk that a place like South Florida that already has major droughts and already has major drinking water shortages can afford to take. So, that's an unacceptable risk. The unacceptability of that risk ought to be considered strongly. (0002-6-9 [Grosso, Richard])

Comment: I'd like to ask that you please look at the protection of our wetlands and our national parks, and be careful of saltwater intrusion in our aquifers. It doesn't seem like that when we're going to be drilling for more fresh water that we need here, as well as filling acres, what we have wetland restorations for now. (0002-8-4 [O'Katy, Jessica])

Comment: 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. (**0015-2** [Espinosa, Carlos])

Comment: There is already salt water intrusion into the area to the west of TP. Not only is this a threat to the rock in the area, you cannot use rock for building if it has salt water in it, but to the water supply. TP 3&4 have already increased the salinity in the area; the cooling canals are twice the density of sea water. Any operation of TP 6&7 which will increase salinity could force the need for desalinization to produce potable water. (**0016-8** [White, Barry])

Comment: 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. (**0022-1-1** [Reynolds, Laura])

Comment: 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. (**0022-1-21** [Reynolds, Laura])

Comment: 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. (0022-2-20 [Reynolds, Laura])

Comment: 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. (**0022-3-2** [Reynolds, Laura])

Comment: 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. (**0022-3-3** [Reynolds, Laura])

Comment: [T]he effect that the proposed facility would have on surface and groundwater quality, and groundwater table elevation within the C111 Basin (Model Land Area). Furthermore, any model used for evaluation of this project should be able to predict changes, if any, in the contaminant concentrations; in the water table elevations; and in the salinity wedge movement under different scenarios (baseline and post-construction conditions, for a wet, dry, and average year, etc). Models should combine groundwater with surface water and contaminant transport, and shall include the effect of the difference in densities between salt and fresh water. In addition, the area in the model should be large enough to avoid any boundary-induced bias; boundary conditions could be taken from South Florida Water Management District regional models. EPA authorized models, such as MODFLOW, MODPATH, and FEMWATER should be considered for use in this study. Another possible model would be the FEFLOW, which combines the groundwater contaminant transport (MODFLOW and MODPATH capabilities) with the two density fluids wedge salinity difference (FEMWATER capability). (**0023-1-14** [LaFerrier, Marc])

Comment: [A] DERM approved hydrologic study and its results shall be provided that evaluates all impacts to surface and groundwater. This study should include consideration of seasonal differences in groundwater flow cited in Section 3.3.3.2 and determine the extent to which these differences are due to current operations at Turkey Point. (**0023-3-47** [LaFerrier, Marc])

Comment: The FKAA requests that additional ground water modeling and monitoring be presented at the current salt/fresh water interface of the Biscayne Aquifer. As you see in the attached ground water monitoring plan, a trend has been shown and interface presented in collaboration with the USGS and Miami-Dade County to demonstrate the current interface location and its movement. For the EIS, modeling of potential changes to the interface position of this salt/fresh interface resulting from the proposed impacts from the construction and operation of the facility is requested. (0024-3 [Walker, Tom])

Comment: A robust, peer-reviewed hydrologic modeling analysis is essential to fully incorporate regional and site specific conditions in the vicinity of Turkey Point. The Biscayne Aquifer has a unique lithology and consists of a karst substrate with very high transmissivity. This surficial aquifer is hydraulically connected to nearby man-made surface water bodies, which has a profound impact on model construction. FPL's current groundwater model fails to simulate actual or planned conditions that include: seasonal and temporal variability, hypersaline plume migration, Biscayne Aquifer heterogeneity, and CERP project implementation. NPS does not believe the COL sufficiently analyzes or evaluates these hydrological and estuarine issues. (0025-2-1 [Kimball, Dan] [Lewis, Mark])

Comment: Given the sensitive designation of the adjacent surface water body, Biscayne National Park, a horizontal pilot test, including a tracer study, should be considered as a critical design feature and would be more representative of actual full-scale RCW operation than a limited scope vertical pump test. (**0025-3-1** [Kimball, Dan] [Lewis, Mark])

Comment: The new hypersaline plume delineation and hydrogeologic data collected as part of the well drilling and logging for the Uprate Project for Turkey Point Units 3 & 4 should be incorporated in the groundwater modeling and planning for evaluation of the effects of the RCWs. (**0025-3-10** [Kimball, Dan] [Lewis, Mark])

Comment: The groundwater model should reflect implementation of CERP project features. (0025-3-11 [Kimball, Dan] [Lewis, Mark])

Comment: The Biscayne Aquifer is an unconfined surficial aquifer that has a fragile karst macroporosity substrate. A comprehensive geological survey should be performed for the proposed locations of the RCWs (Turkey Point peninsula) to identify voids or cavities in the aquifer substrate. Soil borings that were performed as part of the 2009 pump test are not aerially sufficient to represent a known dual porosity karst limestone aquifer. (**0025-3-12** [Kimball, Dan] [Lewis, Mark])

Comment: Contingency plans should be established should a karst fracture occur during the construction or operation of the RCWs. (**0025-3-13** [Kimball, Dan] [Lewis, Mark])

Comment: Even based on the rather dubious groundwater modeling provided, FPL is proposing to remove 8% of the total withdrawal from the aquifer, which equals approximately 10 million gallons of groundwater daily. Pursuant to the Resolution (No. Z-56-07, conditions 4 & 5) of the Board of County Commissioners of Miami-Dade County, FPL shall not apply for any water withdrawals from the Biscayne Aquifer as a source of cooling water for the proposed facilities, and shall use reclaimed or reuse water to the maximum extent possible. This consumptive water use conflict must be resolved. (**0025-3-14** [Kimball, Dan] [Lewis, Mark])

Comment: The effects of dewatering on the Biscayne Aquifer (e.g., hypersalinity plume migration, salt water intrusion, etc.) during plant construction were based on the dubious current model, and warrants further evaluation. (**0025-3-16** [Kimball, Dan] [Lewis, Mark])

Comment: Drilling through karst limestone can cause a bay bottom collapse or a cavity could be encountered that would be significantly closer to the surface than anticipated. A structural collapse due to macroporosity features of the Biscayne Aquifer (i.e., dual porosity) or drilling through existing touching-vug preferential flow zones or large karst features would alter the potential velocity of flow through the RCW. Flow in this case would be substantially higher than anticipated. These types of macrokarst features have been found in drilling the wells for the

Units 3 & 4 Uprate project, and should be reflected in the groundwater model. (**0025-3-2** [Kimball, Dan] [Lewis, Mark])

Comment: The groundwater model (FSAR Section 2.4-12 Appendix 2CC) utilizes a constant density groundwater model with a reference value of seawater. Average salinity values are not appropriate since Biscayne Bay is an estuarine environment with seasonal salinity variability, which is not equivalent to an ocean salinity pattern. In addition, shallow groundwater salinity observed during the 2009 pump test in MW-I SS (20 avg psu) is not representative of seawater. Also, the groundwater in the vicinity of the Industrial Waste Facility exhibits hypersaline concentrations (68 avg psu). A groundwater salinity range of 48 psu on average is not indicative of a constant density groundwater profile. The constant density assumption cannot adequately determine the effects of the hypersaline plume eastern migration and bay salinity impacts due to the operation of the RCWs and dewatering activities. (**0025-3-3** [Kimball, Dan] [Lewis, Mark])

Comment: A coupled surface water and groundwater hydrologic model, including a separate solute transport module, is necessary to fully evaluate all the associated impacts to Biscayne Bay. (0025-3-4 [Kimball, Dan] [Lewis, Mark])

Comment: The model input parameters (e.g., hydraulic conductivity, boundary inflow values, etc.) should be based on site specific conditions and data, when available, and be consistent with the calibrated results. Please note that the model calibration results in Table 2CC-205 of the COL, FSAR, Part 2, do not correspond to the calibration results provided in the State of Florida SCA. This discrepancy between the two applications should be rectified. Furthermore, the hydraulic conductivities listed in Table 2CC-205 for the different stratigraphic units of the aquifer do not appear to correspond to site-specific hydraulic conductivity values obtained from on-site pump tests nor published values. This flaw seriously affects the results and validity of the groundwater model. (0025-3-5 [Kimball, Dan] [Lewis, Mark])

Comment: The margin of error associated with the groundwater model simulation results should be provided. This information is necessary to ascertain the value of the model and how realistic the model output is. 5. Seasonal variability (i.e., rainfall, water levels, surface water flow, salinity, etc.) is inherent to South Florida and cannot be sufficiently reflected in a steady state model. (**0025-3-6** [Kimball, Dan] [Lewis, Mark])

Comment: There are significant temporal differences between the cooling canals, Biscayne Aquifer, and the bay that will affect the water source pathway for the RCWs, which cannot be evaluated with a constant density, steady state model. (**0025-3-7** [Kimball, Dan] [Lewis, Mark])

Comment: An equivalent porous media value was utilized for the groundwater model, which does not reflect the Biscayne Aquifer. The Biscayne Aquifer is defined as a heterogeneous aquifer with documented dual porosity and preferential flow pathways. (**0025-3-8** [Kimball, Dan] [Lewis, Mark])

Comment: Should a preferential subsurface flow pathway be encountered through an RCW lateral, the water source intake will originate from the flow pathway of least resistance. This scenario should be accounted for in the groundwater modeling (**0025-3-9** [Kimball, Dan] [Lewis, Mark])

Comment: Salt water intrusion is already a problem on our aquifer, anymore rock mining and water usage will cause further degradation of our fresh water supply. (**0027-6** [Moses, Dorothy])

Comment: Turkey Point is hastening saltwater intrusion into South Miami-Dade well fields that supply water to our nearby communities. (**0031-7** [De Villiers, Elena])

Comment: The SFWMD recommends that the following issues be addressed in the Environmental Impact Statement: Radial Wells and Construction Dewatering Withdrawals at Power Plant Site – The potential for adverse impacts to regional water resources, including public water supply wellfields, Biscayne National Park, the Biscayne Bay Aquatic Preserve, and the Florida Keys National Marine Sanctuary from induced seepage from the Turkey Point cooling canal system as a result of cumulative impacts, including additional loading from construction dewatering/wastewater discharges and runoff from stored muck, and reduced head in the vicinity of the power block construction dewatering withdrawals and the radial well withdrawals. The unlined cooling canal system contains hypersaline water overlying the highly permeable Biscayne Aquifer. The salinity of cooling canal system water is significantly greater than natural groundwater salinity in the area and the waters within adjacent Biscayne Bay; therefore, the presence of density driven seepage upgradient (to the west) and downgradient (to the east and south) is likely. Monitoring wells up to approximately three miles west of the cooling canal system have encountered groundwater with chemical constituents indicative of cooling canal system water, including hypersalinity and/or tritium. Constituents within the cooling canal system that have or may have the potential to degrade water resources include hypersaline water, radiological isotopes, nutrients, or other compounds that may be discharged into the cooling canal system from plant operations and/or muck storage adjacent to the cooling canal system. (0032-11 [Golden, James])

Comment: Ground Water Modeling Summary – *Conceptualization and Configuration:* The entire model domain is assumed to be constant density and saline. Both of these assumptions are inconsistent with other submitted documentation. The simulation bounds of the model are neither all saline nor are they of the same density. FPL has asserted that the assumption is valid for the type of analyses (pump induced drawdown of flux) conducted. While this may be possible in the narrowest interpretation, it is likely that impacts of density dependent flow or temperature induced buoyancy may dominate in some areas; however, the modeling provided does not afford the SFWMD or FPL the opportunity to examine these situations. Also, it is unusual for a system that is made up of fresh, brackish, salt and hyper-saline water to be generically represented as sea water. While we understand an equivalent fresh water head was used, the impacts of this representation on gradients, stage (heads), simulated drawdown, and

flows, as well as conclusions derived from these, need to be further explored and justified. (**0032-29** [Golden, James])

Comment: Ground Water Modeling Summary – *Boundary Conditions*: By utilizing a steady state simulation, the impact of selected boundary conditions will propagate over the entire model. By definition, a steady state is reached when all hydrologic drivers, including those specified at the boundaries, reach equilibrium. This assumption makes the specification of the model boundaries, such as head in the constant head cells that represent Biscayne Bay, very crucial. It is understood that for permitting purposes, non-exact simulations may be acceptable, if they are conservatively estimated; however, a non-conservative estimate (e.g., the water level in Biscayne Bay) could result in under-estimation or over-estimation of pumping rate necessary to achieve necessary drawdown during dewatering. Similarly, a non-conservatively selected stage in Biscayne Bay could overestimate the contribution of this boundary (source) to the radial collection well system. It is typical in these scenarios for extensive sensitivity analyses to be performed to establish the sensitivity of the outcome or conclusions, to erroneous or non-conservatively specified boundary conditions. FPL has applied an average value to the boundary representing Biscayne Bay. This may mask tidal or seasonal trends and is unlikely to represent the critical condition for dewatering or assessing the impacts of dewatering. (0032-30 [Golden, James])

Comment: Ground Water Modeling Summary – *Parameterization:* In selecting model parameters and applying them to the model cells, FPL has used a homogeneous representation of aquifer parameters in a highly heterogeneous aquifer system. This representation is, along with some unusual layering in the model construct, suspect, and must be tested to ensure that it does not negate conclusions drawn from the model. Specific concerns include the representation of the vertical hydraulic conductivity of the top two layers in the model (1 to 1 ratio for Kh to Kv), the representations of those layers in locations where canals and other surface features intersect the conceptual (or physical) tops of the model layers, as well as the representation of the vertical connectivity in layers that were split for predictive simulations following the calibration. It is important for FPL to demonstrate that the conclusions and determinations based on modeling remain unchanged, with more correct representation of model parameters. (0032-31 [Golden, James])

Comment: Ground Water Modeling Summary – *Calibration:* The model was calibrated to the results of on-site pump tests (quantitative) and to regional groundwater gradients and flow directions (qualitative). Both calibrations were based on steady state simulations. FPL justified these simulations by the rapid response of the system to the volumes extracted during the pump test. This was further justified by the intent to apply the tools also in steady state. While these justifications are understood, the calibration remains insufficient and does not represent stresses to the system similar in magnitude to the intended applications. In addition, the conditions used for calibration do not demonstrate the impact of the effect of boundary conditions on the simulation results. Lastly, the model does not include important on-site

operations or features present during the pump test that could contribute to the observed data to which the model is calibrated. The foregoing notwithstanding, a review of the calibration results presented show a number of situations where multiple monitoring wells show exactly the same, response in the model while they vary in the measured data. This may be suggestive of impacts of a specified boundary or inadequately tuned model parameter. If the variability that is missing is important to the required outcome from the model, then the model may not be adequately calibrated for use. (0032-32 [Golden, James])

Comment: The SFWMD recommends that the following issues be addressed in the Environmental Impact Statement: The adequacy of the ground water modeling submitted by FPL. (**0032-7** [Golden, James])

Comment: The SFWMD recommends that the following issues be addressed in the Environmental Impact Statement: Radial Wells and Construction Dewatering Withdrawals at Power Plant Site – The potential for the proposed withdrawals to exacerbate saline water intrusion and ground water contamination due to the existence of preferential flow paths within the Biscayne aquifer. (0032-8 [Golden, James])

Response: The impacts of the proposed action on water resources, specifically the potential impacts to water availability and water quality in the Biscayne Aquifer, will be assessed by the review team and presented in Chapters 4 and 5 of the EIS for building and operating proposed Turkey Point Units 6 and 7, respectively. Modeling data provided by the applicant will be reviewed and evaluated in the course of developing this assessment. Cumulative water-use and water-quality impacts will be addressed in Chapter 7.

Comment: FPL, just last year, negotiated a new groundwater monitoring plan with the South Florida Water Management District. However, there were compliance questions from the initial groundwater monitoring plan that had been issued 20 years ago, and there was, I think, a lack of some transparency of looking at the groundwater data. So I would request that that data be sought and included in your evaluation in the scoping process. (**0002-3-5** [Walker, Tom])

Comment: We understand that the FPL has negotiated a new ground water monitoring program with the South Florida Management District (SFWMD.) Unfortunately, the prior ground water monitoring plan has been questioned and from what we have understood, had compliance issues which were never quite resolved. Subsequently, a new monitoring plan was laid out and approved by the SFWMD; yet, much of the historic information may provide important trending information which would be helpful for the EIS to evaluate. We request that the NRC obtain the previous ground water monitoring information relative to these cooling canals and analyze their past and present impacts to the ground water in the adjacent aquifer. (**0024-2** [Walker, Tom])

Response: The environmental monitoring data collected at the existing units for the current baseline water resources in the affected environment, including water quality and quantity, will be discussed in Chapter 2 of the EIS. Chapters 4 and 5 will include descriptions of environmental monitoring to be conducted at the units during building and operating, respectively. Cumulative impacts will be assessed in Chapter 7. The EIS will include citations for documents used in its preparation.

Comment: 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. (**0022-3-8** [Reynolds, Laura])

Comment: 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. (**0022-3-9** [Reynolds, Laura])

Response: These comments refer to the distance between proposed Turkey Point Units 6 and 7's water-management feature and the salinity intrusion front in the Biscayne Aquifer. A description of the affected environment, including local groundwater flow, water quality, and quantity, will be presented in Chapter 2 of the EIS. The plant layout, including the detailed locations of facilities and design specifications for the units, will be provided in Chapter 3.

Comment: Miami-Dade County has previously provided the U.S. Nuclear Regulatory Commission with a copy of our comments on the State of Florida Site Certification Application for the Turkey Point Power Plant. The County would like to point out one discrepancy between the state and federal applications, the Florida Power and Light owned fill source was removed from the state application but remains part of the federal application. The proposed fill source may adversely impact groundwater, destroy wetlands and advance salt water intrusion closer to wellfields. Additional details on these concerns are provided in the attached table summarizing our initial comments on the state application. This table, as well as, the documents previously submitted to the NRC should be considered as part of the record for the scoping process. (**0023-1-1** [LaFerrier, Marc])

Response: The NRC process is to review the COL application and prepare an EIS based on the actions proposed in the application. Information to be used during the review will include documents obtained from State and Federal agencies, including the SCA to the extent necessary to characterize the Turkey Point site. The FPL-owned fill source remains in the COL at this time and a review of the environmental impacts of obtaining fill material will be presented in Chapter 4 of the EIS.

Comment: The application proposes to dewater up to 26 MGD of groundwater by discharging it to the cooling canals. Pursuant to Condition No. 15 of the Unusual Use Approval Resolution
Z-56-07, a DERM approved hydrologic study is required. The study results are required to evaluate all impacts to surface and groundwater, including but not limited to all dewatering activities. The hydrologic study should include, but not be limited to providing data and modeling to show how the existing groundwater plume under the Cooling Canal System would respond to the dewatering activities. (**0023-1-2** [LaFerrier, Marc])

Comment: Sufficient information is not provided to make a determination of dewatering impacts. Please provide a description of all required dewatering activities and the techniques that will be used to ensure that all surface and groundwater quality standards will be met. (**0023-1-3** [LaFerrier, Marc])

Response: These comments refer to the SCA submitted to the State of Florida by FPL, but they indicate an interest in the potential impacts of the proposed units on water quality and hydrology from the discharge of dewatering flows to the cooling-canal system during plant construction. The review team will assess the impact of proposed Turkey Point Units 6 and 7's dewatering at the site on water resources. The dewatering effluent produced by the proposed units will be described in Chapter 3 of the EIS. The impacts of building the proposed units on water resources will be presented in Chapter 4. Cumulative impacts will be addressed in Chapter 7. Modeling data provided by the applicant will be technically evaluated in the course of developing the EIS.

Comment: Disposal of the facility's wastewater is proposed via deep well injection into the boulder zone. The application does not include an evaluation of the technical feasibility for reuse of the wastewater discharge for the benefit of the Biscayne Bay Coastal Wetlands Project as required pursuant to Z-56-07. (0023-3-38 [LaFerrier, Marc])

Response: This comment refers to the SCA submitted to the State of Florida by FPL, but it indicates an interest in alternative uses of blowdown water from the proposed units. Alternatives to deep-well injection for plant effluent discharges will be described in Chapter 9 of the EIS.

Comment: [T]he application does not provide sufficient detail on what standard of reclaimed water quality is required. This information is necessary to evaluate the application (**0023-1-29** [LaFerrier, Marc])

Response: This comment refers to the SCA submitted to the State of Florida by FPL, but it indicates an interest in the quality of reclaimed water to be used as cooling water at the proposed units. The water quality of the reclaimed water will be described in Chapter 3 of the EIS.

Comment: Conditions outlined in Zoning Resolution Z-56-07 must be met to achieve land use/zoning consistency. This resolution stated that no water will be withdrawn from the

Biscayne Aquifer (Condition 4) and that a hydrologic study (Condition 15) will be performed. The radial well component does not demonstrate consistency with these two conditions; therefore this component will be subject to a land use/zoning consistency determination. (**0023-1-31** [LaFerrier, Marc])

Comment: Selection of potential locations, idealized designs, number of wells, and even the pipe sizes of the radial lines of the collector wells should be based on hydrogeologic data within the areas Biscayne Bay that the wells will tap. (**0023-1-32** [LaFerrier, Marc])

Comment: Site specific aquifer characteristics have not been made available. (**0023-1-33** [LaFerrier, Marc])

Comment: Lithologic descriptions are contradictory. The observations from the site subsurface investigation (Section 3.3.2.2) contradict expectations that almost all the water withdrawn by the radial collector wells would be recharged from the Bay (Section 3.3.4.1). Therefore additional information is necessary to evaluate this aspect of the proposal. (**0023-1-34** [LaFerrier, Marc])

Comment: [D]etermine the impact of the radial collector well system on the fate and transport of the groundwater plume associated with the cooling canal system, the potential for and effect of the recharge of the radial collector well system through horizontal preferential flow zones in the aquifer, the impact of the radial collector well system on salt intrusion. (**0023-1-35** [LaFerrier, Marc])

Comment: [N]o information was found in the application discussing potential effects of inducing ground water flow towards the proposed withdrawal wells. (**0023-1-38** [LaFerrier, Marc])

Comment: Neither preferential vertical nor horizontal stratigraphic flow directions have been established. Vertical hydraulic conductivity data is not presented in the application, but it is needed to properly evaluate how the horizontal screens installed in the Fort Thompson Formation 30 to 35 feet below the shallow bay bottom are expected to preferentially draw water from the less transmissive Miami Limestone above instead of from the much more transmissive Fort Thompson. (**0023-1-39** [LaFerrier, Marc])

Comment: Cones of influence are not defined and aquifer pump-test data has not been presented to properly evaluate hydrologic conditions under which the collector wells would be operated. Neither has there been any data presented to indicate the potential cone of depression that pumping more than 120 million gallons a day from a wellfield located along the shoreline would have on the movement of the salt front line. (**0023-1-40** [LaFerrier, Marc])

Comment: The applicant has not provided sufficient geologic, hydrologic and water quality data to evaluate the application. (**0023-1-41** [LaFerrier, Marc])

Comment: The applicant has not provided sufficient information to evaluate the mixing chamber model that was used to project impacts from the radial collector wells. (**0023-1-42** [LaFerrier, Marc])

Comment: Adequate hydrogeologic data have not been presented and the application does not include sufficient information to determine whether the proposed withdrawals from the radial collector wells would meet the requirements of Section 24-43.2 Miami-Dade County Code. Selection of potential locations, idealized designs, number of wells, and even the pipe sizes of the radial lines of the collector wells should be based on hydrogeologic data within the areas under Biscayne Bay that the wells would tap. (**0023-1-44** [LaFerrier, Marc])

Comment: Please provide adequate analysis in support of the conclusion made that the Biscayne Aquifer is not affected by the Radial Collector wells. A fully three dimensional mathematical model should be used to determine the boundary conditions (influence cones) of the proposed radial collector well. (**0023-1-47** [LaFerrier, Marc])

Comment: Application does not adequately demonstrate that the proposed radial collector wells do not violate Condition 4 of Z-56-07 which prohibits withdrawal from the Biscayne Aquifer. (**0023-1-66** [LaFerrier, Marc])

Comment: Data presented for Groundwater Impact assessment is not sufficient. Visual MODFLOW data files are not provided for assessment. Not enough data provided to assess statement that radial collector wells are substratum collectors of saltwater that will recharge from below Biscayne Bay. The applicant states that almost all the water withdrawn by the proposed radial collectors will be recharged from the Bay; however, no data to support this statement is provided in the application. The applicant shall provide all relevant data relating to recharge of the Biscayne Aquifer that would be induced by operation of the radial collectors. Pursuant to Condition No. 4 of the Unusual Use approved but he BCC through resolution Z-56-07, FPL shall not apply for any withdrawals from the Biscayne Aquifer as a source of cooling water for the proposed facilities. (0023-1-68 [LaFerrier, Marc])

Comment: The radial wells are located so as to draw from the easterly groundwater flow. Please resolve the apparent conflict between the location of the wells and the water from which they are drawing and Condition 4 of Z-56-07, which prohibits withdrawal from the Biscayne Aquifer. (**0023-1-70** [LaFerrier, Marc])

Comment: Condition 5 of Z-56-07 requires FPL to analyze the potential use of marine water as a secondary source of cooling water. Under this scenario, a directional bore would be used to construct a pipeline under the Florida Keys National Marine Sanctuary or under Biscayne National Park in order to obtain salt water from the ocean with limited or no permanent impacts to benthic resources. Provide a detailed analysis that documents the reasons why this potential secondary source of cooling water was not selected. (**0023-3-40** [LaFerrier, Marc])

Response: These comments refer to the SCA submitted to the State of Florida by FPL, but they indicate an interest in impacts on the Biscayne Aquifer below Biscayne Bay from the withdrawal of cooling water using radial collector wells (RCW) at proposed Turkey Point Units 6 and 7. The impacts of these units consumptive use of water on local and regional water resources, including the Biscayne Aquifer, will be presented in Chapters 4 and 5 of the EIS for building and operating, respectively. Cumulative water-use impacts will be addressed in Chapter 7 and cooling-water alternatives in Chapter 9.

Comment: The application does not provide information on how the water management project [at the FPL-owned fill source location] would operate, the water source for the feature, any related infrastructure, projected water quality of the completed feature, or information on "best technology" regarding a liner or other hydrologic isolation from surrounding ground and surface waters, the hydrologic impact of the feature on adjoining areas. (**0023-3-13** [LaFerrier, Marc])

Response: Available information about the water-management feature will be provided in Chapter 3 of the EIS. The impacts of the water-management feature on water resources will be presented in Chapters 4 and 5 for building and operation, respectively, based on information about the affected environment provided in Chapter 2. Cumulative impacts will be presented in Chapter 7.

Comment: And that's what they're trying to do on a couple of the different designs, is to pump the water back down into the ground. There have got to be some options. We have too much knowledge and too much in our industry to overcome these minor problems. (**0002-12-10** [McHugh, John])

Response: The comment refers to the discharge of effluent from the plant, specifically the effluent sourced from reclaimed water to be used as cooling water at proposed Turkey Point Units 6 and 7. The proposed units' effluent discharge locations, quantity, and quality will be described in Chapter 3 of the EIS. Alternative discharge locations will be discussed in Chapter 9.

Comment: FPL recently proposed a restriction on using the RCWs to 90 days per year; this proposed restriction is not mentioned in the COLA. Such inconsistencies between the two separate applications should be resolved and the State of Florida SCA and NRC COL applications should be fairly uniform. (**0025-1-5** [Kimball, Dan] [Lewis, Mark])

Response: The NRC process is to review the COL application, including revisions provided by the applicant, and prepare an EIS based on the actions proposed in the application. Information to be used during the review will include documents obtained from State and Federal agencies, including the SCA, to the extent necessary to characterize the Turkey Point site. A review of the environmental impacts of using RCWs to obtain cooling water will be presented in Chapter 5 of the EIS.

Comment: To add insult to injury, these 2 dangerous nuclear plants are proposed to be over/around the only natural aquifer we have that provides clean water to millions of people! (**0028-2** [DiNuzzo, Laura])

Response: The impacts of building and operating proposed Turkey Point Units 6 and 7 on the sustainability of local and regional water resources will be presented in Chapters 4 and 5 of the EIS, respectively. Cumulative water-use impacts will be addressed in Chapter 7.

Comment: The CEIS should include, at minimum, an analysis of the water quality for the source water for each dewatering project, including radionuclides such as tritium. (**0023-1-4** [LaFerrier, Marc])

Response: The CWA designated the Environmental Protection Agency (EPA) as the Federal agency with general responsibility for effluent discharges to the nation's waters. In Florida, the EPA has delegated this responsibility to the Florida Department of Environmental Protection (FDEP). Therefore, in Florida, the FDEP is the primary regulatory authority over water quality. While the NRC only regulates radiological effluents, the NRC does have the responsibility under NEPA to assess and disclose the expected impacts of the proposed action on water quality. The assessment of the radiological and nonradiological impacts on water quality from the operation of proposed Turkey Point Units 6 and 7 will be presented in Chapter 5 of the EIS.

Comment: The proposed radial collector wells would be located within or adjacent to a groundwater plume emanating from FPL's Cooling Canal System, which contains high levels of chlorides. It also contains tritium, which may be used as a tracer. In addition, portions of this plume contain heated water, although underground directional travel of the heated water has not been established. No information regarding the delineation of this plume is contained within the application and the extent to which this plume would be affected by the proposed groundwater withdrawals is not documented. (0023-1-37 [LaFerrier, Marc])

Response: The impacts of the RCWs with respect to building and operating proposed Turkey Point Units 6 and 7 on Biscayne Bay and adjacent lands are part of the overall EIS analysis. The results of the analysis of impacts of proposed Turkey Point Units 6 and 7 operations on water quality, ecology, and aesthetics will be presented in Chapter 5 of the EIS, and the results of cumulative impact analyses will be presented in Chapter 7.

Comment: The proposed project requires a significant amount of borrow material to build the platform for the new reactors. Such volumes of borrow in high quantities requires significant movement of material in and around the aquifers in such low lying areas as South Miami-Dade County. Such excavation can disturb the water resources. The EIS should do a quantification of the amount of material required and its potential impact to see if in fact such borrow material can be moved or can be excavated in the vicinity of the existing power plant and the FKAA well

field. If not, material must be obtained elsewhere where such impacts are not detrimental to local well fields. (**0024-5** [Walker, Tom])

Response: Available information about the fill source will be provided in Chapter 3 of the EIS. The impacts of obtaining fill material will be presented in Chapter 4; and the cumulative impacts of the proposed action by FPL to build and operate proposed Turkey Point Units 6 and 7, along with other past, present, and reasonably foreseeable future actions by other agencies, will be presented in Chapter 7.

Comment: A major area of interest is whether operation of the radial collector wells would cause the karst Biscayne Aquifer to fracture (frac out), thereby altering the salinity of the Biscayne Bay and affecting the area's fish and wildlife resources. Staff from Florida Power and Light (FPL) believes that these radial collection wells will not be used for a substantial part of the time that the plant would be in operation, and consequently taken a conservative approach by modeling a scenario during which the radial collector wells would inject water laterally constantly. Other agencies participating in the review and whose staff has the expertise to test the model are doing so, and we are waiting for the results in order to determine the extent to which we may be concerned about the possibility of frac out actually occurring. (**0018-1** [Poole, Mary Ann])

Comment: Concerns still remain regarding unknowns related to the Radial Collector Well (RCW) System including, but not limited to: possible impacts to the Bay including benthic flora and fauna; salinity; and possible impacts of the radial collector wells on the freshwater input to the bay, flora and fauna. These issues and concerns will require further review and discussion. (**0020-1** [Mulkey, Cindy])

Comment: The operation of the RCWs would result in hydrologic impacts, including ... surface water, on Biscayne Bay due to geological disturbances, resulting in water volume and quality alterations ... [A] large portion of the nearly 124 million gallons of Biscayne Bay water will originate from within Biscayne National Park boundaries, which is a protected water body. (**0025-1-13** [Kimball, Dan] [Lewis, Mark])

Comment: The Florida Department of Environmental Protection (FDEP) is requiring a revised groundwater model due to many deficiencies, including the inability to effectively simulate impacts to Biscayne Bay; as a result, the SCA remains incomplete to date. Thus, a revised groundwater model is pending submittal to the State of Florida for the SCA process. The revised SCA groundwater model should be consistent with the groundwater model submitted as part of the COLA. A model that represents the Biscayne Aquifer and site specific hydrologic features is necessary to fully evaluate the impacts of the operation of the radial collector wells (RCWs) on the Biscayne Bay nearshore ecosystem function (see Attachment 1.B.).Therefore, the COLA groundwater model results that claim 92 to 100 percent of the intake water for the RCWs comes from the bay has not been substantiated. (**0025-1-4** [Kimball, Dan] [Lewis, Mark])

Comment: Other specific issues NMFS recommends for evaluation in the EIS or EFH assessment: 1.a *Radial wells*. Impacts to EFH associated with radial well construction and operation within Biscayne Bay should be fully evaluated. The evaluations should include detailed HDD routes and examinations of the potential for frac-outs. Monitoring and mitigation measures for frac-out detection and clean-up will also be needed. (**0033-5** [Croom, Miles])

Comment: Other specific issues NMFS recommends for evaluation in the EIS or EFH assessment: 1.b *Radial wells*. Impacts to EFH associated with radial well construction and operation within Biscayne Bay should be fully evaluated. The evaluations should include detailed explanations of the circumstances under which radial wells would be required and at what capacities. (0033-6 [Croom, Miles])

Comment: Other specific issues NMFS recommends for evaluation in the EIS or EFH assessment: 1.d *Radial wells*. Impacts to EFH associated with radial well construction and operation within Biscayne Bay should be fully evaluated. The evaluations should include a more clear explanation of how use of the radial wells will affect salinity, including identification of the geographic area that would be affected and how that area would change seasonally and under various environmental conditions (such as tides and prevailing wind conditions). This analysis of effects on water quality also should include pH and temperature. (**0033-8** [Croom, Miles])

Response: These comments indicate an interest in impacts on the Biscayne Aquifer below Biscayne Bay and on the Bay itself from the withdrawal of cooling water using RCW at the proposed units. The impacts of the plant's consumptive use of water on local and regional water resources, including the Biscayne Aquifer, will be presented in Chapters 4 and 5 of the EIS for building and operating, respectively. Cumulative water-use impacts will be addressed in Chapter 7 and cooling water alternatives in Chapter 9.

9. Comments Concerning Ecology – Terrestrial

Comment: I was very disappointed to hear that the U.S. Army Corps of Engineers so casually referred to that almost all nuclear power plants are placed near wetlands. That, alone, to me is a concern. This one, too, would be the same. (**0001-11-3** [Amor, Valerie])

Comment: They [FPL] may need 90 million gallons of cooling water a day for these two new units. One plan would take that from a big sewage treatment plant to be built 25 miles up the road. How would they get 90 million gallons of water a day down here? That takes a big pipe and maybe some pumping stations. They're not going to get permission to run that down through Biscayne Bay so they'll have to put it in the wetlands, and there go the wetlands next to the Bay. (**0001-6-4** [Miller, Lloyd])

Comment: Besides fresh water loss the loss of wetlands is the other major thing we're trying to fix there. The numbers of wetland loss here are just astronomical, and they're not something that we really ought to be considering in modern 2010 times anymore. (**0002-6-5** [Grosso, Richard])

Comment: The planned expansion of Units 6&7 of Turkey Point requires the permanent destruction of untouched wetlands just off of the Biscayne Bay national park regions. (**0007-1** [Burris, Jessica])

Comment: In the West Preferred Corridor, additional access pads (approximately 79-170 ft long) are proposed east of the power line poled structures that would provide access from the structure pads to the existing L-31 North Levee Road (Figures 5A-5B). Additional wetland filling would be required to construct the proposed pads beneath the power line poled structures. Construction of the access roads/pad would require filling of more than 100 acres of wetlands within the West Preferred Corridor (that is currently within Everglades National Park) per the COLA/SCA. A perpetual 90 ft vegetation easement is proposed to extend from the westernmost portion of the West Preferred Corridor into ENP to allow FPL to manage non-native vegetation. (**0025-3-31** [Kimball, Dan] [Lewis, Mark])

Comment: Vegetation in the ENP portion of both transmission line corridors identified by FPL consists primarily of high quality, long and short hydroperiod native marsh and prairie communities. Direct impacts of the construction and maintenance of power line infrastructure on the natural abundance and distribution of these native plant communities need to be evaluated. 2. Limited information on the presence of state listed threatened and endangered plant species exists for either corridor identified by FPL. Nonetheless, preliminary surveys of the Western Preferred Corridor resulted in the identification of at least one state listed endangered plant species within the boundary of the corridor. Additional survey work is needed and the results of that survey work should be used to evaluate impacts on threatened and endangered plant species in both corridors. 3. The proposed exotic vegetation management easement associated with the Western Preferred Corridor will result in the modification and/or of native plant species by mechanical or chemical means within boundaries of ENP. The impacts of these actions on individual species native plant community composition need to be considered in this evaluation. 4. Soil disturbance and modification of natural elevations in either corridor identified by FPL has the potential to introduce new invasive plant species or exacerbate existing invasive plant species populations. These impacts need to be evaluated. (0025-3-34 [Kimball, Dan] [Lewis, Mark])

Response: The impacts on wetlands from building proposed Turkey Point Units 6 and 7, including water supply pipelines and transmission corridors, will be addressed in Chapter 4 of the EIS and the impacts of plant operation will be addressed in Chapter 5.

Comment: I had fished, hunted and camped exactly where the power plants are before they were built. I could tell you, beyond a doubt right now, there's probably, in most instances, as

many fish, deer, and other types of wildlife in that area now as there were when I was a kid. That hasn't been impacted all that greatly. (**0002-13-7** [Simpson, Roce])

Response: The impacts of building and operating proposed Turkey Point Units 6 and 7 on fish and wildlife will be evaluated in Chapters 4 and 5 of the EIS, respectively.

Comment: The second area of concern, of course, is Everglades impact. The expansion will impact hundreds of acres of wetlands which is contradictory to our very expensive and very important effort to restore the Everglades right now. (**0001-7-3** [MacLaren, Kaitlin])

Comment: It [the new transmission lines] also will create a corridor for invasive species; it will disrupt the water flow; birds run into power lines all the time, electrocutions, collisions. (0002-14-10 [Schwartz, Matthew])

Comment: The largest percentage of this land, 61% of the 38,607 acres evaluated for this project are composed of wetlands bordering Biscayne National Park, Biscayne Bay Aquatic Preserve, Homestead Bayfront Park, the Model Lands Basin, and the Everglades Mitigation Bank as openly noted in the NRC environmental report concerning this expansion. The destruction of wetlands in the surrounding areas of national reserves has possible drastic results on the reserved area. In addition to destroying the ecological foundation for wildlife in the affected region itself, the permanent destruction of everglade wetlands surrounding the reserve equally affects the ecology of areas designated to remain untouched by U.S National Park service and the U.S department of the interior. (0007-3 [Burris, Jessica])

Comment: The Draft EIS needs to fully address the alternative transmission line corridors and the environmental effects it may have on Everglades National Park. (**0014-15** [Mueller, Heinz])

Comment: 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 for rare threatened and endangered species. (0015-3 [Espinosa, Carlos])

Comment: 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. (0015-4 [Espinosa, Carlos])

Comment: Construction of roads and tower pads would likely result in soil disturbance and the colonization of exotic vegetation like Brazilian pepper if unchecked. The potential land exchange property is frequently used for exotic vegetation management and monitoring of wetlands in the project area. NPS staff would be required to monitor the impacts of FPL's exotic vegetation management practices on native vegetation in the vegetation management easement granted to FPL and adjacent natural vegetative communities within the park. (**0025-3-43** [Kimball, Dan] [Lewis, Mark])

Response: The potential impacts of building and operating proposed Turkey Point Units 6 and 7 on Everglades National Park, Biscayne National Park, and other parks and preserves, especially on wetlands within those areas, will be evaluated in Chapters 4 and 5 of the EIS, respectively. The cumulative impacts on wetlands and other ecological resources in these areas will be evaluated in Chapter 7.

Comment: [A]ny environmental mitigation should include purchasing large tracts of land south of the plant between Florida City and Key Largo and adding this acreage to Everglades National Park or Crocodile Lake National Preserve. Several endangered panthers have been hit by cars in this area, crocodiles and manatees use Turkey Point's warm water as mating and winter weather locations. The area south of the Nuclear plant is not a good location for homes or businesses due to proximity to the plant both for safety and security as well as environmentally sensitive lands. This land should be protected as part of the environmental mitigation and permitting. (**0008-2** [Garcia, Preston])

Response: The potential mitigation for wetland impacts and impacts on Federally and State-listed threatened or endangered species will be discussed in Chapters 4, 5, and 7 of the EIS. Evaluation of the impacts of building and operating proposed Turkey Point Units 6 and 7 on regional land use will also be included in those chapters.

Comment: [T]he planned use of SW 359 Street as a service road through wetlands for Turkey Point 6 & 7 will compromise a \$135 Million CERP/Comprehensive Everglades Restoration Project. (**0012-7** [Payne, Nkenga])

Comment: Road construction will also cause direct wetland loss and fragmentation. (**0025-2-18** [Kimball, Dan] [Lewis, Mark])

Response: The potential impacts of proposed Turkey Point Units 6 and 7 transmission line and access road construction and operation on regional wetlands, including those involved in the CERP, as well as potential mitigation actions, will be evaluated in Chapters 4, 5, and 7 of the EIS.

Comment: The Draft EIS should discuss how the construction of Units 6 and 7 would impact sensitive coastal. wetlands and any mangrove protected areas along Biscayne Bay and adjacent to Biscayne National Park. The Draft EIS should also address any issues related to the Florida Everglades Mitigation Bank. (**0014-10** [Mueller, Heinz])

Response: The impacts of building proposed Turkey Point Units 6 and 7 on coastal wetlands and mangrove-protected areas along Biscayne Bay will be evaluated in Chapter 4 of the EIS. The possible role of the Florida Everglades Mitigation Bank, and other wetland mitigation banks in the region, in the mitigation of wetland losses will also be evaluated in Chapter 4.

Comment: The Draft EIS needs to provide information on measures that have been taken to avoid and minimize wetland impacts. According to the Clean Water Act (CWA) Section 404(b)(1) Guidelines, an applicant must demonstrate avoidance and minimization of wetland impacts before compensatory mitigation can be considered. Specifically, no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem. Practicable alternatives include activities which do not involve the discharge of dredged or fill material into waters of the United States. (0014-17 [Mueller, Heinz])

Response: Wetland mitigation measures, as applicable to CWA Section 404 compliance, including avoidance and minimization efforts, will be discussed in Chapter 4 of the EIS.

Comment: List of potentially occurring State-listed fish and wildlife species

Common name	Scientific name	State-listing status
Atlantic sturgeon	Acipenser oxyrinchus	Species of special concern
American alligator	Alligator mississippiensis	Species of special concern
American crocodile	Crocodylus acutus	Endangered
Eastern indigo snake	Drymarchon corais couperi	Threatened
Least tern	Sterna antillarum	Threatened
Limpkin	Aramus guarauna	Species of special concern
Snail kite	Rostrhamus sociabilis plumbeus	Endangered
Everglades mink	Mustela vison evergladensis	Threatened
Florida manatee	Trichechnus manatus latirostris	Endangered

(0018-3 [Poole, Mary Ann])

Comment: The site has nesting habitat for the least tern. Least terns are listed as threatened by the FWC and may potentially be nesting on the cleared gravel upland portions of the site. Please provide least tern nesting surveys and address the loss of potential nesting habitat. (**0018-5** [Poole, Mary Ann])

Comment: 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. (**0022-1-16** [Reynolds, Laura])

Comment: 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. (0022-2-21 [Reynolds, Laura])

Response: The potential impacts of building and operating proposed Turkey Point Units 6 and 7 and associated facilities on Federally and State-listed threatened or endangered species will be addressed in Chapters 4 and 5 of the EIS, based on the affected environment described in Chapter 2. The analysis will consider possible impacts resulting from airborne pathogens. The EIS will include citations for documents used in its preparation.

Comment: 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. (0022-1-17 [Reynolds, Laura])

Comment: 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. (**0022-1-19** [Reynolds, Laura])

Comment: 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. (**0022-2-3** [Reynolds, Laura])

Response: The potential impacts of building proposed Turkey Point Units 6 and 7 on ecological resources, including the impacts of airborne releases, will be addressed in Chapters

4, *5*, and 7 of the EIS, based on the affected environment described in Chapter 2. The analysis will consider possible impacts to species and habitats resulting from airborne pathogens and contaminants. The EIS will include citations for documents used in its preparation.

Comment: The applicant should also provide the management plan for listed species required under Condition 2 of Z-56-07, which should include but not be limited to identifying the plans established to protect endangered or threatened species from impacts resulting from the proposed work. (**0023-1-19** [LaFerrier, Marc])

Comment: The application states, "Due to the limited amount of upland habitat, mammalian wildlife species are relatively uncommon in the vicinity of the Site" and fails to acknowledge that there is a possibility for Florida panther in the vicinity. It should be noted that there have been three documented vehicle strikes of Florida Panthers in this region, including two road kills in the recent past. In addition, there have been recent agency reports of additional animals in the area, including a panther/cub pair. The application does not provide sufficient information to evaluate potential impacts to ecological resources including but not limited to rare threatened and endangered species resulting from the installation and use of the proposed access roads. [Same statement for transmission lines] (0023-2-13 [LaFerrier, Marc])

Comment: The application notes that the Eastern indigo snake has been observed both within and adjacent to the boundaries of the site. Please provide a Comprehensive Environmental Impact Statement that includes, but is not limited to, the potential effects of the construction and operation of the plant and its associated non-linear and linear features on the Eastern indigo snake. [Same statement for transmission lines] (**0023-2-16** [LaFerrier, Marc])

Comment: Please provide documentation that demonstrates that critical habitat for threatened and endangered species will not be degraded and/or destroyed, as required pursuant to the Miami-Dade County CDMP. (**0023-4-9** [LaFerrier, Marc])

Response: These comments refer to the SCA submitted to the State of Florida by FPL, but they indicate an interest in the potential impacts of the proposed units on Federally and State-listed threatened or endangered species. The potential impacts of building and operating proposed Turkey Point Units 6 and 7 on Federally and State-listed threatened or endangered species will be discussed in Chapters 4, 5, and 7 of the EIS, based on the affected environment described in Chapter 2.

Comment: High quality coastal wetlands exist on the shoreline along the proposed area of work. (**0023-1-46** [LaFerrier, Marc])

Comment: Pursuant to Condition 1 of Z-56-07, the applicant shall submit a wetlands mitigation plan for the Units 6 and 7 Site. Pursuant to Condition 1 of Z-56-07, the plan shall identify the specific mitigation that is for the Units 6 and 7 Site. (**0023-1-62** [LaFerrier, Marc])

Comment: It is unclear from the application whether the proposed rock mines will impact existing wetland restoration areas associated with previous unauthorized impact to wetlands on FPL property in this location. (**0023-3-18** [LaFerrier, Marc])

Response: These comments refer to the SCA submitted to the State of Florida by FPL, but they indicate an interest in the potential impacts of proposed Turkey Point Units 6 and 7 on wetlands. The potential impacts of building and operating the proposed units on wetlands will be discussed in Chapters 4, 5, and 7 of the EIS, based on the affected environment described in Chapter 2.

Comment: The CEIS should include, at a minimum, a comprehensive species survey that utilizes professionally-accepted sampling standards to survey plants and animals at multiple locations in the mudflat at least quarterly for a minimum of one year. Sampling should include, but not be limited to algae, vascular plants, insects, birds, reptiles, amphibians, fish, aquatic invertebrates, and mammals. (0023-1-22 [LaFerrier, Marc])

Comment: The application does not address biological, hydrological, and ecological impacts resulting from road construction and operation. Impacts that shall be addressed include but are not limited to disruption of ecological corridors, altered hydrology in surrounding wetlands (e.g. via barriers to sheetflow), increased invasion rate of non-native species, increased road-kill, impacts to listed species and their habitat, including but not limited to Florida panthers and Eastern indigo snakes, and increased access that may facilitate illegal dumping, ATV riding, poaching, and other activities that may directly or indirectly impact surrounding wetlands. (**0023-1-50** [LaFerrier, Marc])

Comment: [P]lease provide locations, details and descriptions of all wildlife protection features, including but not limited to wildlife fencing and panther underpasses. (**0023-2-17** [LaFerrier, Marc])

Comment: Application is incomplete and includes incorrect characterization of the vegetation adjacent to the site. Corrected and missing information is needed to determine the potential impacts of the application, especially on state and federally protected species. Vegetation adjacent to the site and located along the transmission line corridors includes freshwater communities, and the coastal vegetation communities are more diverse than characterized. Please provide a complete vegetation survey for all transmission line corridors, including but not limited to complete species lists for each community type and identification and location of state and federally protected species. Please also provide a complete analysis of utilization of these vegetation communities by fauna, including but not limited to insects, birds, fish, aquatic invertebrates, reptiles, amphibians, and mammals, and including but not limited to season of use, use by state or federally protected species, and nature of use. (**0023-3-22** [LaFerrier, Marc])

Comment: The application provides insufficient information on the potential effects of the transmission line corridors on state and federally protected species, designated EEL sites, Natural Forest Communities, and tree resources protected. (**0023-3-23** [LaFerrier, Marc])

Comment: The application states that new rights-of-way will need to be obtained for the east transmission line corridor. Please provide details on where new rights of way will be obtained, and whether there are state or federally protected plant or animal species, designated EEL sites, Natural Forest Communities, or tree resources that could be impacted by the work within these proposed new rights-of-way. (**0023-3-24** [LaFerrier, Marc])

Comment: Any improvements to the transmission corridors, including but not limited to the installation of power poles and lines must avoid/minimize impacts to Natural Forest Communities. A survey of all Natural Forest Communities, within and adjacent to the transmission corridors, is required and all proposed impacts to Natural Forest Communities must be identified. (0023-3-25 [LaFerrier, Marc])

Comment: Please submit plans for the protection of Endangered and Threatened Species both during construction and for the temporary and long term use of the proposed roads and facilities. (0023-3-51 [LaFerrier, Marc])

Comment: [T]he referenced location will be permanent or temporary, final slopes and elevations for the piles, what measures will be taken to address stormwater runoff from the spoil piles, characterization of the material including but not limited to contamination levels, potential impacts to threatened and endangered species including but not limited to potential impacts to critical habitat, and potential impacts to surrounding coastal wetlands. (**0023-4-14** [LaFerrier, Marc])

Response: These comments refer to the SCA submitted to the State of Florida by FPL, but they indicate an interest in the potential impacts of proposed Turkey Point Units 6 and 7 on Federally and State-listed threatened or endangered species, wetlands, and other terrestrial resources. The potential impacts of building and operating the proposed units on terrestrial ecological resources will be discussed in Chapters 4, 5, and 7 of the EIS, based on the affected environment described in Chapter 2.

Comment: Construction and use of new access or improved access roads will provide a conduit for introduction of invasive exotic species on adjacent lands, including but not limited to, EEL conservation lands. (**0023-2-5** [LaFerrier, Marc])

Comment: Chapter 24 and the Landscape Code of Miami-Dade County require that all invasive/exotic plant species be removed prior to site development, even outside of mitigation areas. Please address exotic plant management for all parcels where impacts will occur. (**0023-3-53** [LaFerrier, Marc])

Response: These comments refer to the SCA submitted to the State of Florida by FPL, but they indicate an interest in the potential impacts of the proposed units and transmission lines on habitat quality on adjacent lands. The potential impacts of building and operating proposed Turkey Point Units 6 and 7 and transmission corridors on terrestrial ecological resources will be addressed in Chapters 4, 5, and 7 of the EIS, based on the affected environment described in Chapter 2. The analysis will consider the potential impacts from invasive and exotic plant species.

Comment: Please provide in the Draft EIS a proposed mitigation plan to offset unavoidable wetland impacts. The mitigation plan should be in compliance with Federal Compensatory Mitigation Rule, dated April 10, 2008. (**0014-18** [Mueller, Heinz])

Comment: [T]he applicant shall submit a wetlands mitigation plan for the areas impacted by the construction of the access roads. (**0023-2-10** [LaFerrier, Marc])

Comment: A substantial proportion of the access road network passes through and, if approved, will impact the South Dade Wetlands and South Dade Wetlands Addition, both of which are projects designated for acquisition by Miami-Dade County's Environmentally Endangered Lands (EEL) Program. The applicant must provide information on the ultimate disposition of all proposed access roads that occur within the boundaries of these EEL projects, including but not limited to identifying roads that will be downgraded or removed, and which rights of way or road corridors could potentially be transferred or dedicated to the EEL program at the completion of the construction phase of the project after road remediation has been completed. (**0023-2-11** [LaFerrier, Marc])

Comment: Please submit information demonstrating that impacts to wetlands within and adjacent to the proposed roadway expansion area have been avoided and minimized to the maximum extent possible. (**0023-2-12** [LaFerrier, Marc])

Comment: Environmentally Endangered Lands (EEL) owned and/or managed conservation lands exist along proposed access roads. The application has not detailed the potential impacts to EEL land from any work related to the roads. The application should provide information on which roads are proposed as temporary, the ultimate disposition of the access road network, and an analysis of options for remediation of temporary roads after the project has been completed, including but not limited to road removal, restoration of impacted natural areas, and dedication of the restored land to the EEL Program. (0023-2-8 [LaFerrier, Marc])

Comment: The EEL Program owns additional land in other areas in which project features occur, so changes to roads and rights-of-way may impact publicly-held and managed lands beyond the proposed project areas. (**0023-2-9** [LaFerrier, Marc])

Comment: Please provide additional documentation to describe the time associated with the proposed functional gain, especially in areas where the ecology, including change in the floral and faunal composition, is projected to recover based on relatively minor changes in hydroperiod and/or hydropattern. (**0023-4-5** [LaFerrier, Marc])

Comment: The SFWMD recommends that the following issues be addressed in the Environmental Impact Statement: Wetland Mitigation Proposals – The potential benefits and/or adverse impacts related to FPL's wetland mitigation proposals. Limited information has been provided to date by FPL regarding potential wetland mitigation options. (**0032-27** [Golden, James])

Response: These comments refer to the SCA submitted to the State of Florida by FPL, but they indicate an interest in the potential impacts of the proposed units and ancillary linear corridors on wetlands and other environmentally sensitive lands. The potential impacts of building and operating proposed Turkey Point Units 6 and 7 and ancillary corridors on wetlands and other sensitive areas and potential mitigation of those impacts will be discussed in Chapters 4, 5, and 7 of the EIS, based on the affected environment described in Chapter 2. FPL will be required to submit a wetland mitigation plan as part of the CWA Section 404 permit application submitted to the USACE.

Comment: The NPS is particularly concerned about the potential harm to water-dependent birds, including endangered wood storks, snail kites and a host of migratory bird species that nest, forage and feed within or near the West Preferred and West Secondary corridors. Potential effects include degradation or fragmentation of valuable wetlands habitat, disturbance of birds during construction, and the permanent risk of avian injuries and death from electrocution or collisions with the transmission lines, towers, and guy wires. This area is the focus of a number of important ecosystem restoration projects that specifically seek to increase the wetland function in these areas and provide improved habitat suitability for a variety of wetland-dependent species, particularly water-dependent birds. The construction of a large complex of transmission lines in this area creates a perpetual risk to birds that is inconsistent with the goals of Everglades restoration projects. The EIS should assess the impacts of the proposed transmission infrastructure on all avian species known to use the area with particular emphasis on state- and Federally-listed threatened and endangered and migratory bird species. A risk assessment should be performed that outlines specific methods that will be employed to avoid and minimize impacts to avian species. (0025-2-11 [Kimball, Dan] [Lewis, Mark])

Comment: The Eastern Preferred Transmission Line Corridor should be evaluated for impacts to migratory, roosting, and nesting birds. State-listed wading birds (e.g., white ibis) have nightly roosts in islands of Biscayne National Park, and they fly to the mainland daily crossing over proposed Eastern transmission lines. In addition, bald eagles, ospreys, and State-listed wading birds also have active nests within Biscayne National Park boundaries. A risk assessment

should be performed that outlines specific methods that will be employed to minimize impacts to roosting and nesting birds. (**0025-2-6** [Kimball, Dan] [Lewis, Mark])

Comment: The proposed corridors are located adjacent to multiple wading bird colonies containing federal and state-listed species including the wood stork (Mycteria americana), snowy egret (Egretta thula), little blue heron (Egretta caerulea), tricolored heron (Egretta tricolor), and white ibis (Eudocimus albus). More than 30 other avian species of concern (federal and/or state listed) are known to, or have the potential to, occur in the corridors and habitats. 2. The endangered Everglade snail kite (Rostrhamus sociabilis plumbeus) forages and nests directly within the footprint of the proposed West Preferred Corridor. 3. Listed avian species are at risk of injury/mortality from collisions and electrocutions with the proposed power lines. Both corridors cross known flight pathways of the endangered wood stork and the Everglade snail kite. The West Preferred Corridor crosses flight pathways of other protected migratory species, such as waterfowl, that use the Atlantic Flyway during seasonal migrations. 4. Based on their sheer abundance, including juveniles within the area, proximity to the power line, frequent flights across the West Preferred Corridor, and morphology, listed wading birds meet many of the risk factors known to affect avian mortality rates caused by transmission power lines. 5. The endangered wood stork may be at highest risk of injury/mortality from the proposed powerlines of all avian species due to its limited population size, body form, nocturnal foraging behavior, flight patterns, and abundance of juveniles in the area. 6. Implementation of the proposed transmission lines would result in filling of over 100 acres of habitat within Everglades National Park that includes wood stork and Everglade snail kite foraging habitat as well as Everglade snail kite nesting habitat. 7. Florida panthers have been documented in and around both corridors within ENP. Suitable panther habitat within the park would be reduced by over 100 acres as wetlands are filled for tower pads and access roads. Potential effects to panthers would include temporary disturbance during construction. (0025-3-32 [Kimball, Dan] [Lewis, Mark])

Comment: More than 200 avian species are at risk of increased injury/mortality resulting from potential electrocutions and collisions with the proposed power lines. Species known to produce streamers, such as raptors, vultures, and herons, are at risk of injury/mortality from electrocution with the proposed power lines. 2. Besides the previously mentioned listed and special status species, other non-listed avian species that nest within colonies adjacent to the proposed corridors include great egrets (*Ardea alba*), great blue herons (*Ardea herodias*), cattle egrets (*Bub ulcus ibis*), anhingas (*Anhinga anhinga*), black-crowned night herons (*Nycticorax nycticorax*), and yellow-crowned night herons (*Nyctanassa violacea*). 3. More than 40 bird species that are not threatened, endangered, or special status species are anticipated to nest within the proposed corridors or adjacent habitats. 4. Implementation of the proposed transmission lines would result in filling of over 100 acres of habitat used by more than 200 avian species. (**0025-3-33** [Kimball, Dan] [Lewis, Mark])

Comment: The SFWMD recommends that the following issues be addressed in the Environmental Impact Statement: Electrical Transmission Lines – Another area of concern is specific to tree islands, which are commonly used as bird rookeries. Islands in or adjacent to this corridor have been Wood Stork rookeries in recent years. Given that Wood Storks are an endangered species and that restoration of the Wood Stork population, along with other Everglades wading bird populations, is a primary CERP target, the construction and presence of electrical transmission lines that could impact these tree islands and their fauna should be avoided. Please note that there may also be potential adverse impacts to the Wood Stork population and other Everglades wading bird populations from the West Preferred Corridor. (**0032-25** [Golden, James])

Response: The potential impacts of building and operating the proposed new transmission lines on migratory, roosting, and nesting birds, including those that are Federally or State-listed as threatened or endangered will be addressed in Chapters 4, 5, and 7 of the EIS, based on the affected environment described in Chapter 2.

Comment: Eliminate or reduce the direct and secondary wetland impacts and impacts to wetland-dependent listed species. The amendment does not demonstrate elimination or reduction of direct and secondary wetland impacts and impacts to wetland-dependent listed species' Please provide alternative analyses to document elimination or reduction of direct and secondary wetland impacts for all potential roadway corridors. Potential secondary impacts include habitat fragmentation, other induced development, and habitat alteration related to opportunistic undesirable (or exotic) vegetation. (0032-35 [Golden, James])

Comment: Revise the habitat assessment to better reflect the actual habitat values. Provide mitigation adequate to offset the proposed wetland impacts. (**0032-36** [Golden, James])

Response: These comments refer to the SCA submitted to the State of Florida by FPL, but they indicate an interest in the potential impacts of the proposed units and ancillary facilities on wetlands and habitat degradation. The potential impacts of building and operating proposed Turkey Point Units 6 and 7 and ancillary facilities and corridors on wetlands and habitat degradation will be discussed in Chapters 4, 5, and 7 of the EIS, based on the affected environment described in Chapter 2.

Comment: These sections characterize the plant site as sparsely-vegetated hypersaline mud flats which provide limited habitat for aquatic biota due to fluctuations in water levels and salinity associated with the cooling canal system, DERM staff observations of the plant site during site visits, however, indicated that the site was heavily vegetated during the early wet season 2009, A Comprehensive Environmental Impact statement is needed pursuant to Chapter 24 of the Miami-Dade Code that addresses this and other issues. CEIS should include, at a minimum, a complete seasonally-based biological surveys for the proposed facility site that includes, but is

not limited to birds, insects, fish, reptiles and amphibians, mammals, and aquatic invertebrates. (**0023-1-17** [LaFerrier, Marc])

Comment: The SFWMD recommends that the following issues be addressed in the Environmental Impact Statement: Radial Wells and Construction Dewatering Withdrawals at Power Plant Site – The potential for adverse impacts to wetlands and listed species. (**0032-12** [Golden, James])

Comment: The SFWMD recommends that the following issues be addressed in the Environmental Impact Statement: Additional Construction Impacts at Power Plant Site – The potential for adverse impacts to wetlands and listed species. (**0032-14** [Golden, James])

Comment: The SFWMD recommends that the following issues be addressed in the Environmental Impact Statement: Temporary Roadway Improvements for Construction of Units 6 & 7 – The potential for adverse impacts to environmentally sensitive lands within the Model Land Basin. (0032-16 [Golden, James])

Comment: The SFWMD recommends that the following issues be addressed in the Environmental Impact Statement: Reclaimed Water Pipeline – The potential for adverse impacts to wetlands and listed species. (0032-17 [Golden, James])

Comment: The SFWMD recommends that the following issues be addressed in the Environmental Impact Statement: Electrical Transmission Lines – The potential for adverse impacts to wetlands and listed species. (**0032-19** [Golden, James])

Response: The potential impacts of building and operating proposed Turkey Point Units 6 and 7 and ancillary facilities and corridors on wetlands, Federally and State-listed species, and other terrestrial important resources will be addressed in Chapters 4, 5, and 7 of the EIS, based on the affected environment described in Chapter 2.

Comment: The application does not include the listed species management plan, as required under Condition 2 of Z-56-07. Please provide the required plan. (**0023-1-63** [LaFerrier, Marc])

Comment: A plan is needed for in-kind, in-situ mitigation for impacts to existing wetlands related to the Radial Collection Well Area and Radial Collector Well Delivery Pipeline. Please include planting scheme, success criteria, monitoring and maintenance schedules. High quality coastal wetlands exist on the shoreline along the proposed area of work. (0023-1-71 [LaFerrier, Marc])

Comment: The application does not provide a complete and detailed exotic vegetation management plan as required by Condition 12 of Z-56-07. (**0023-2-30** [LaFerrier, Marc])

Comment: The application fails to provide sufficient information to determine whether it is in compliance with the tree protection provisions of Section 24-49 of the Miami-Dade Code. (**0023-2-31** [LaFerrier, Marc])

Comment: The application does not include the management plan for all federal and state listed threatened and endangered species documented within the proposed access area, as required under Condition 11 of Z-56-07. (**0023-2-32** [LaFerrier, Marc])

Comment: Please submit a proposed schedule for long term monitoring, maintenance and financial assurances for all proposed mitigation areas. Please submit more detailed information about the location and types of anticipated impacts associated with the secondary Impacts. Please submit a detailed assessment of the time lag and risk associated with the restoration of the temporary impacts. (0023-3-69 [LaFerrier, Marc])

Comment: It was stated that the Basis of Review and ratios were used to determine the mitigation credits necessary in the HID. According to the Basis of Review, the ratios should be 1.5/1 to 4/1. How was the proposed 1/1 determined and how is it consistent with the Basis of Review and the agency decisions used for other wetland impacts in the area? (**0023-4-15** [LaFerrier, Marc])

Comment: The HID Mitigation Bank has a finite amount of mitigation that they can perform annually and receives funding from other impact associated with private development. Please provide evidence that the large amount of mitigation, as proposed, can be accomplished in the projected time frame. (0023-4-16 [LaFerrier, Marc])

Comment: The application does not provide the planting plan required under Condition 13 of Z-56-07 for material that will not be planted at the proposed plant site. (**0023-4-18** [LaFerrier, Marc])

Comment: The application does not include the listed species management plan, as required under Condition 2 of Z-56-07. Please provide the required plan. Pursuant to Condition 2 of Z-56-07, the plan shall include but not be limited to identification, location, and description of features such as permanent physical barriers, visual buffers, and the establishment of development setbacks necessary to prevent both direct and indirect impacts to adjacent critical habitat and disruption of sensitive behaviors such as breeding, nesting and foraging within the adjacent critical habitat. (**0023-4-20** [LaFerrier, Marc])

Response: These comments are directed at the applicant and refer specifically to the SCA submitted to the State of Florida by FPL, but they indicate an interest in the impacts of building and operating proposed Turkey Point Units 6 and 7 on terrestrial resources. The potential terrestrial impacts of building the units will be presented in Chapter 4 of the EIS and the

potential terrestrial impacts of operating the units will be presented in Chapter 5. Cumulative terrestrial impacts will be presented in Chapter 7.

Comment: What impact will salt deposition from the cooling towers have on freshwater wetlands in the area? What are the cumulative impacts of salt deposition from Units 3 and 4 in addition to those from the proposed Units 6 and 7? (**0018-16** [Poole, Mary Ann])

Comment: Other specific issues NMFS recommends for evaluation in the EIS or EFH assessment: 3. *Cooling towers*. Please evaluate potential impacts to wetlands from salt deposition from the cooling towers. (**0033-11** [Croom, Miles])

Response: The potential impacts of operating proposed Turkey Point Units 6 and 7 on terrestrial ecological resources, including the impact of salt deposition from drift, will be discussed in Chapters 5 and 7 of the EIS, based on the affected environment described in Chapter 2.

10. Comments Concerning Ecology – Aquatic

Comment: The reason they want to stay in that spot is because they're going to use the ocean water to cool the reactors. That hot water goes somewhere. It has been shown over and over again it produces algae blooms; it affects the pH around there; it kills the fish; it changes it. We have a fragile coral reef that runs along us. We are in a fragile environmental area. It is an environmental impact. (0001-11-10 [Amor, Valerie])

Response: The potential impacts from cooling water, including the use of reclaimed water from Miami-Dade County, use of water obtained from RCWs located at Turkey Point, and discharge of heated water to the Boulder Zone, will be discussed in Chapter 5 of the EIS.

Comment: I haven't even begun to talk about fish and wildlife, road impacts, exotic species, and all of that. But there's a lot of information out there from the State Siting Act process that you should look at. (0002-6-7 [Grosso, Richard])

Comment: 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. (**0022-2-6** [Reynolds, Laura])

Comment: 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. (**0022-2-7** [Reynolds, Laura])

Response: A variety of sources of information will be used during the development of the EIS, including information associated with the Florida SCA. The EIS will include citations for documents used in its preparation.

Comment: List of potentially occurring State-listed fish and wildlife species

Common name	Scientific name	State-listing status
Atlantic sturgeon	Acipenser oxyrinchus	Species of special concern
American alligator	Alligator mississippiensis	Species of special concern
American crocodile	Crocodylus acutus	Endangered
Eastern indigo snake	Drymarchon corais couperi	Threatened
Least tern	Sterna antillarum	Threatened
Limpkin	Aramus guarauna	Species of special concern
Snail kite	Rostrhamus sociabilis plumbeus	Endangered
Everglades mink	Mustela vison evergladensis	Threatened
Florida manatee	Trichechnus manatus latirostris	Endangered

(0018-2 [Poole, Mary Ann])

Response: The potential impacts on Federally and State-listed threatened and endangered species, including those listed in the comment, from building and operating proposed Turkey Point Units 6 and 7 will be discussed in Chapters 4 and 5 of the EIS.

Comment: 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. (**0022-3-1** [Reynolds, Laura])

Response: The EIS will discuss the aquatic resources in the vicinity of Turkey Point in Chapter 2 of the EIS and will consider potential impacts from building proposed Turkey Point Units 6 and 7 in Chapter 4. Chapter 7 will evaluate cumulative aquatic impacts.

Comment: 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. (**0022-3-18** [Reynolds, Laura])

Comment: The application does not provide sufficient information to demonstrate how manatees will be protected during construction of the barge slip improvements. (**0023-1-64** [LaFerrier, Marc])

Comment: Potential impacts to other key resources in Biscayne National Park - 4. FPL should clarify how they would transport construction supplies and equipment to the worksite, including via marine pathways, and evaluate any additional impacts on the marine environment. (**0025-3-30** [Kimball, Dan] [Lewis, Mark])

Response: The potential impacts of increased barge traffic associated with building proposed Turkey Point Units 6 and 7 and the potential impacts of altering the barge slip will be discussed in Chapter 4 of the EIS.

Comment: Detailed surveys of all fish and wildlife resources in the vicinity of each proposed component of this project, to include laydown areas for construction equipment; areas that will be temporarily disturbed by excavations; and areas that may potentially be affected by changes in salinity, turbidity and sedimentation due to the operations of project. Please include, but do not limit to: benthic species and habitats (seagrasses, hardbottom, reefs, and associated reef resources), plankton, mangroves, and protected species (both Federally and State-listed). The design of all survey methodologies should be coordinated with the FWC. Provide a map of delineated habitat types (including mangroves and submerged habitats such as seagrasses and hardbottoms) with an overlay of the project component footprints. (**0018-4** [Poole, Mary Ann])

Comment: For the 60-foot x 100-foot x 9-foot deep barge unloading area expansion, please provide fish and wildlife resource surveys and sea grass surveys. With regard to the potential for manatees to occur in the barge unloading expansion area during construction, the applicant should provide information detailing how observers will be selected, whether they have any previous experience observing for manatees, how many observers will be assigned to the construction areas, and how many hours per day each observer will be assigned to work. (**0018-6** [Poole, Mary Ann])

Comment: 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. (**0022-3-21** [Reynolds, Laura])

Comment: The application proposes several wildlife underpasses to facilitate movement of crocodiles under construction roads within the plant boundary. Please provide a detailed

analysis of how the specified locations were selected and how crocodiles that may occur outside the plant near linear features (such as the transmission lines, access roads and spoil disposal routes) will also be protected from disturbance. [Same statement for T-Lines] (**0023-2-15** [LaFerrier, Marc])

Comment: Seasonal patterns of behavior of threatened and endangered species occupying Biscayne National Park, such as West Indian Manatees and American crocodiles, may occur if water salinity, temperature or quality changes as a result of construction or operation of Units 6&7 and non-transmission facilities. These impacts should be evaluated. (0025-3-29 [Kimball, Dan] [Lewis, Mark])

Response: The EIS will discuss the aquatic resources in the vicinity of Turkey Point in Chapter 2 and will consider potential impacts to benthic communities, fish, manatees, and sea turtles in Biscayne Bay and American crocodiles from building and operating proposed Turkey Point Units 6 and 7 (and planned mitigation) in Chapters 4 and 5.

Comment: Impacts to submerged aquatic vegetation: Please submit a description of expected short term and long term anticipated impacts resulting from the proposed scope of work (**0023-1-18** [LaFerrier, Marc])

Response: The nature and extent of submerged aquatic vegetation will be discussed in Chapter 2 of the EIS. Potential impacts to submerged vegetation of building and operating proposed Turkey Point Units 6 and 7 will be discussed in Chapters 4 and 5, respectively. Cumulative impacts of operating the proposed units and other past, present, and reasonably foreseeable future actions that impact the same resources will be discussed in Chapter 7.

Comment: Please provide documentation in support of this statement, including but not limited to a copy of the cited report with current data on nesting activity, nest success, hatchling sex ratios and survivorship, and survivorship to adulthood of juveniles hatched at Turkey Point over the period of record during which crocodile monitoring has been occurring at the Turkey Point power plant. [Same statement for T-Lines] (**0023-2-14** [LaFerrier, Marc])

Response: The past and current populations of the American crocodile will be characterized and a description of the recent monitoring program for this species will be provided in Chapter 2 of the EIS.

Comment: The cumulative effects of the proposed Units 6&7 plants and non-transmission facilities will place considerable stress on an already vulnerable ecosystem and potentially cause harm to Biscayne Bay and adjacent coastal wetlands. Disturbances to estuarine, marine, and terrestrial habitats are likely to result from proposed Units 6&7 construction and operation. (**0025-1-11** [Kimball, Dan] [Lewis, Mark])

Response: The potential impacts associated with building and operating proposed Turkey Point Units 6 and 7 will be discussed in Chapters 4 and 5 of the EIS, respectively. A discussion of the cumulative impacts associated with the proposed units will appear in Chapter 7.

Comment: The operation of the RCWs would result in ... water volume and quality alterations posing a threat to ecosystem function of the nearshore habitats of Biscayne Bay. (**0025-1-14** [Kimball, Dan] [Lewis, Mark])

Comment: The operation of the RCWs could potentially change sediment oxidation-reduction potential in seagrass beds and benthic communities, which should be considered an ecological impact. (**0025-3-17** [Kimball, Dan] [Lewis, Mark])

Comment: The net reduction in positive groundwater flux to the benthic ecosystem will occur due to the operation of the RCW. Groundwater is an important source of freshwater for benthic communities and any reduction should evaluated for its associated impact. (**0025-3-18** [Kimball, Dan] [Lewis, Mark])

Comment: Although the radial collector wells will be physically placed in the underlying aquifer and the laterals are not expected to extend into park boundaries, the primary source intake water is Biscayne Bay. Based on the design feature of horizontal production wells and preliminary hydrologic modeling, the cone of influence includes Biscayne National Park waters. The application design is for up to 124 million gallons per day to be withdrawn from these surface waters. The groundwater modeling which predicts minimal impacts to the benthic organisms of the bay appears to consider the subsurface as a singular uniform, non-karst feature, which is not accurate. The groundwater modeling does not provide the degree of detail needed to determine impacts to the benthic organisms of the bay and Biscayne National Park, when the RCW system is operated. (**0025-3-19** [Kimball, Dan] [Lewis, Mark])

Comment: The SFWMD recommends that the following issues be addressed in the Environmental Impact Statement: Radial Wells and Construction Dewatering Withdrawals at Power Plant Site – The potential for the proposed withdrawals to adversely impact the ecology of Biscayne Bay. (**0032-9** [Golden, James])

Response: The potential impacts of RCW operations will be discussed in Chapter 5 of the EIS.

Comment: *Essential Fish Habitat within the Project Area* – <u>Mangrove:</u> The South Atlantic Fishery Management Council (SAFMC) designates mangroves as EFH for juvenile gray snapper (Lutjanus griseus), dog snapper (L. jocu), bluestriped grunt (Haemulon sciurus), spiny lobster (Panulirus argus), and pink shrimp (Farfantepenaeus duorarum). Mangrove habitats are ecologically important coastal ecosystems (Lugo and Snedaker 1974). At a recent meeting, FPL suggested that the mangrove habitat that would be impacted by the water treatment facility (approximately 50 acres) is composed of dwarf red mangroves (Rhizophora mangle) with hypersaline conditions and lack of direct connection to other wetlands or water bodies. These types of mangrove wetlands still provide ecological services including as a buffer against storm surges, they reduce shoreline erosion and turbidity, and absorb and transform nutrients. While this mangrove system may not be inhabited to a large degree by various life stages of federally managed fisheries, they may contribute dissolved and particulate organic detritus to estuarine food webs. They help shape local geomorphic processes and are important in the heterogeneity of landforms which provide shelter, foraging grounds and nursery areas for terrestrial organisms (e.g., through bird use as a rookery and feeding on fish). The root system binds sediments thereby contributing to sedimentation and sediment stabilization. (0033-1 [Croom, Miles])

Comment: <u>Seagrass and Unconsolidated Bottom</u>: SAFMC also designates seagrass as EFH. Species associated with seagrass include pink shrimp, spiny lobster, and estuarine life stages of various species within the snapper/grouper complex including adult white grunt (Haemulon plumieri); juvenile and adult gray snapper (Lutjanus griseus); juvenile mutton snapper (Lutjanus analis). Any bottom-disturbing activities within areas that are seagrass habitat must include best management practices to avoid impacting this habitat. SAFMC also designates soft bottom habitat as EFH because it plays an important role in the ecological function of coastal ecosystems by controlling fluxes of nutrients between the sediment and the water column. Shallow water, unconsolidated bottom also provides EFH by serving as nursery grounds for early life stages of benthic-oriented, estuarine-dependent species; refuges and feeding grounds for forage species and juvenile fishes (SAFMC 2009) and feeding grounds for specialized predators, including adult white grunts (Potts and Manooch 2001). (0033-2 [Croom, Miles])

Comment: Habitat Area of Particular Concern within the Project Area

SAFMC also identifies mangroves and seagrass as a Habitat Area of Particular Concern (HAPC) for several species within the snapper/grouper complex. HAPCs are subsets of EFH that are either rare, particularly susceptible to human-induced degradation, especially important ecologically, or located in an environmentally stressed area. Federal actions with potential adversely impacts HAPCs will be more carefully scrutinized during the consultation process and subject to more stringent conservation recommendations. In addition, Biscayne Bay is an EFH-HAPC for spiny lobster. Biscayne Bay and the Biscayne National Park are also an EFH-HAPC for coral, coral reefs, and hardbottoms (SAFMC 1998). (**0033-3** [Croom, Miles])

Comment: Essential Fish Habitat Consultation Requirements

The Magnuson-Stevens Act directs federal agencies to consult with NMFS when the agency's activities may have an adverse affect on EFH. We recommend that the NRC coordinate closely with the NMFS Habitat Conservation Division to ensure the EFH assessment and NEPA documents contain sufficient detail, 50 CFR 600.10 to 600.920 describes the content required of an EFH assessment. Specifically, the components of an EFH assessment can be found at 50 CFR 600.920(e)(3) and (4) and are listed below (additional comments are provided in

parentheses). The EFH assessment can be incorporated into the EIS or provided to NMFS under separate cover.

Components of an EFH Assessment:

- 1. Description of the action. (This section can reference relevant portions of the EIS.)
- 2. Analysis of the potential adverse effects of the action on EFH and the managed species.
- 3. Federal agency's conclusions regarding the effects of the action on EFH.
- 4. Proposed mitigation. (Unavoidable direct and indirect impacts to EFH will require compensatory mitigation.)
- 5. Results of an on-site inspection to evaluate the habitat and the site-specific effects of the project.
- 6. Views of recognized experts on the habitat or species that may be affected.
- 7. Review of pertinent literature and related information.
- 8. An analysis of alternatives to the proposed action. (This section can reference relevant portions of the EIS alternatives analysis.)

(0033-4 [Croom, Miles])

Response: Essential fish habitat (EFH) and mangrove habitats near Turkey Point will be described in Chapter 2 of the EIS. The review team will also assess potential impacts on EFH, including mangrove resources, from building and operating proposed Turkey Point Units 6 and 7 in an EFH assessment that will be forwarded to the National Marine Fisheries Service (NMFS) for review. The EFH assessment will be included in an Appendix of the EIS.

Comment: [Determine] the impact on wetlands and nearshore surface and groundwater water quality in Biscayne Bay, including as it relates to CERP efforts to promote estuarine conditions in nearshore areas. (0023-1-36 [LaFerrier, Marc])

Response: The impacts of building and operating proposed Turkey Point Units 6 and 7 on wetlands and nearshore surface-water and groundwater quality will be discussed in Chapters 4 and 5 of the EIS. Chapter 7 of the EIS will evaluate cumulative impacts, and include a discussion of how the proposed action might affect current or planned restoration activities in the vicinity of Turkey Point.

Comment: Other specific issues NMFS recommends for evaluation in the EIS or EFH assessment: 1.c *Radial wells*. Impacts to EFH associated with radial well construction and operation within Biscayne Bay should be fully evaluated. The evaluations should include an evaluation of impacts associated with extended use of the radial well system to include an

evaluation of impacts to groundwater that is closely tied to surface water in this porous karst area and thereby supports fish and wildlife resources. (**0033-7** [Croom, Miles])

Comment: Other specific issues NMFS recommends for evaluation in the EIS or EFH assessment: 1.e *Radial wells*. Impacts to EFH associated with radial well construction and operation within Biscayne Bay should be fully evaluated. The evaluations should include a survey and monitoring plan that would enable FPL to determine impacts from radial wells to localized habitats and the fish and wildlife that depend on them. (**0033-9** [Croom, Miles])

Response: The potential impact of building and operating radial wells on aquatic resources will be discussed in Chapters 4 and 5 of the EIS, respectively. The review team will also assess potential impacts on EFH in an EFH assessment that will be forwarded to the NMFS for review. The EFH assessment will be included in an Appendix of the EIS. FPL's proposed monitoring program will be discussed in Chapters 2, 4, and 5.

Comment: Other specific issues NMFS recommends for evaluation in the EIS or EFH assessment: 2. *Deep-well injection*. Please provide an evaluation of effects to fish and wildlife resources from proposed deep-well injection activities. The evaluation should describe the fate (location and concentration over time), of any nuclides injected into the well. (**0033-10** [Croom, Miles])

Response: The potential ecological impacts associated with deep-well injection of cooling tower blowdown will be discussed in Chapter 5 of the EIS.

Comment: We would like to see a baseline survey and monitoring information for the radial collector wells, caissons, and lateral arms, with preferably a minimum of two years of data. This data should include sampling prior to, during, and at least one month after all radial collector well events. Identify and commit to modeling environmental responses such as water quality and fish and wildlife species that depend on seagrass and hard-bottom habitats. FWC staff can work with the applicant to identify species of interest. How will noise from well/pump operation affect fish and wildlife resources (particularly listed species) in the area of the lateral arms and the well caissons? Our staff is concerned that there might be a delayed impact on fish and wildlife resources if phenomena such as "frac-out" or subsidence of the bay bottom should impact on the radial collector wells and their associated lateral arms. Is this a possibility? If so, how will this possibility be avoided, and what contingencies will be in place if "frac-out" or subsidence does occur? Also, since radial collector wells have not yet been used in a saltwater environment, we suggest that FPL anticipate the potential for indirect impacts on fish and wildlife resource needs in the case where there might be a potential failure of the wells due to corrosion. (**0018-10** [Poole, Mary Ann])

Comment: How will fish and wildlife resources over the lateral arms of the radial collector wells be affected by the construction of the wells? How will the lateral arms be "advanced from the

caissons"? We would like to see a survey and monitoring program that specifically enables FPL to determine the contribution of this part of the proposal to any impacts on the surrounding ecosystem, localized habitats and the fish and wildlife that depend on them. (**0018-8** [Poole, Mary Ann])

Comment: FPL's response [to FDEP's SCA review] does not adequately address how benthic resources in the footprint of the RCWs and adjacent areas will not be significantly affected given the fact that at least 3% of the water will come from the Biscayne Aquifer, a source of freshwater inputs to the bay bottom, helping to support the benthic community. (**0020-2** [Mulkey, Cindy])

Response: These comments refer to the Florida SCA, but express a concern that there is the potential for impact to benthic organisms in the vicinity of the RCWs. The potential impact of building and operating the RCWs on benthic resources will be discussed in Chapters 4 and 5 of the EIS, respectively.

11. Comments Concerning Socioeconomics

Comment: Additionally, as Mayor of Florida City, I'm concerned about our economy. And the building of these two power plants in our area will be an immensely beneficial operation as far as spurring our economy. Safety first along with environmental protection; those are the first issue. Even with the economic benefit, if we can't guarantee safety and protection of the environment, we'll have to get jobs elsewhere. But once those two criteria are met, then the job creation becomes immensely important to me. People with jobs don't care about that aspects of it; but people without jobs simply do. (0001-1-5 [Wallace, Otis])

Comment: Also, the gentleman that spoke before from the Chamber of Commerce, which I was a member of, stated that 4,000 jobs would be available for five years. And the gentleman who was just here before me said that 800 permanent jobs would be established. I would like to recall 1970 when Aerojet promised Florida City and Homestead that jobs would be created in the development of the Aerojet canal. Contractors were brought in from out of State and they got the jobs; nothing was done for the benefit of Florida City or Homestead, as you can see. I don't want to see this happen again if they decide to go ahead and approve nuclear plant 6 and 7. (**0001-10-2** [Marinelli, Francis J.])

Comment: When I look at this opportunity for growth and expansion in an area that truly needs it, I, because of not just what someone has told me or what someone has talked about, but it is something that I've lived, I see the benefits of it. I see kids being able to get jobs and come back home to a community that they're so very proud of. I see adults being able to take care of their elderly family members because of the amount of revenue and commerce that is being sparked. So with some of you I agree and others I vehemently disagree. And I say that this is about jobs, but it is about lifestyle, it's about living, and it's about opportunity. (**0001-17-1** [Diggs, Bill])

Comment: We are at a difficult time in our history in this country. Jobs are hard to come by; college kids that you've spent your life savings to send to school are having difficult time finding opportunities. I submit to you this: They'll either find it here or somewhere else. But at the end of the day this is our community. And I stand, if nothing else, but an example of what can happen when community and business works together, because it's not just about jobs. It's about lifestyle; it's about faith; it's about hope. (0001-17-2 [Diggs, Bill])

Comment: Data shows that the nuclear power plants contribute significantly to local economies. These are averages. The creation of a nuclear power plant will result in a creation of 1400 to 1800 jobs during the construction, with peak employment at 2400. As we can see in the back, FP&L has 3600, so the numbers are better. Operating a nuclear power plant generates from 400 to 700 permanent jobs and these jobs pay 36 percent more than average salaries in the local area. Again, FP&L has 800 permanent jobs. These permanent jobs create an equivalent number of additional jobs in the local area and provide goods and services necessary to support the nuclear workforce such as grocery stores, dry cleaners, et cetera. We're looking forward to that. (0001-18-2 [Landeta, Hector])

Comment: Each year an average nuclear plant generates approximately 430 million in sales, goods, and services in the local community and nearly 40 million in total labor income. Again, they have better numbers. They see -- they have 6 billion -- 6 billion in economic benefits to local economy over the next decade. (**0001-18-3** [Landeta, Hector])

Comment: We need jobs. My generation is coming into this hard economic times and we need jobs. You're promising 800 full-time jobs for South Florida for these two reactors. I graduated in a class of 935 students in Palm Beach County. That doesn't cover those people. That's about 135 less jobs than there are people who graduated in my class. There are 23 high schools in Palm Beach County; there are 32 high schools in Miami-Dade. Do you think 800 jobs is going to make a dent in the number of young people looking to enter the work force in South Florida? (**0001-19-7** [Ryan, Megan])

Comment: [T]here are 800 full-time employees at the site and approximately an equivalent number of contractors of the site. Now, those 1600 people, they're members of the community; they buy their gas in the gas stations; they go to the supermarkets; their children go to the schools. (**0001-3-1** [Kiley, Mike])

Comment: We have to look at jobs. We have to build our economy back, a new economy that relies on growth. And the good news is that from this project it's anticipated that as many as 4,000 or more jobs will be added through the construction phase which will last five to seven years. That would be a rich addition to the workforce in South Florida, which will benefit all of us in so many, many ways, but most importantly for those people who are out of work and looking for jobs. And we have so many people in the construction industry who have been hit hard by the downturn in the economy. (0001-5-3 [Johnson, Barry])

Comment: When the project is completed it will include 800 jobs -- 800 more jobs in South Dade; 800 more families in South Dade contributing to the growth of our community. And these are high-skilled well-paying jobs that our community needs. Those are the jobs that will build our future. (**0001-5-4** [Johnson, Barry])

Comment: As the previous speakers have said, 4,000 jobs can be created by having Units 6 and 7 built, and 800 permanent jobs -- not just any regular jobs, but high-paying engineering jobs and the like, can be provided by having 6 and 7 built. (**0001-9-2** [Martinelli, Tom])

Comment: We are here because of the proposed plans to build two atomic plants that will afford us the opportunity, after they are built at Turkey Point, to have a flourishing economy in the area. (0002-10-1 [Alexander, William])

Comment: The Chamber also sees with sympathy all the efforts surrounding the industry, the generating industry, and the production of electricity and energy. We also see that it will provide around 3,000 jobs, which is very, very important to us. We also are considering not just those 3,000 temporary jobs, but also the 800 permanent jobs that would be left here in this region that sorely needs it right now. (0002-10-4 [Alexander, William])

Comment: What these jobs will do -- there's a long-term effect from these two plants. Not only are they going to provide thousands of jobs as they're being built here locally, these jobs are jobs that give a sufficient rate of pay, a living wage. And in addition to that, most of the workers that work on these projects will either receive some type of pension benefits or health and welfare. (**0002-13-3** [Simpson, Roce])

Comment: One of the things you'll also notice when you come to the site is that there's 800 full-time employees, and there's an additional 800 contractors that work at the site and call this community their home. They buy their gas in town, they go food shopping in this town, they use the local restaurants, their children go to the schools. (**0002-5-4** [Kiley, Mike])

Comment: And you have to understand the economic impact and the economic value of a restored Biscayne Bay to the industries that are populated by a lot of folks who probably aren't here tonight; fisherman, recreational users, people that make their money off of that Bay. Those are jobs too, and those have major implications for what happens here in the future. (0002-6-3 [Grosso, Richard])

Comment: We need these new power plants. It provides jobs for honest people. You look at it. A lot of people -- to get in at a nuclear power plant you got to take a 500 question site [psych?] test, plus pass a background check. You are attracting a good crowd of people in this area, which is good economically, not to mention -- I believe there's one other nuclear power plant being built right now, which is Plant Vogtle, I believe in Georgia. And we can lead the way to supplying our power demands. (**0002-7-3** [Snelson, Richard])

Comment: You look at it as far as local impact; the people, the training programs and stuff like that, it's going to provide a lot of permanent jobs for people. You look at all the foreclosures and the people that have lost their jobs. I think it's a win-win situation. (**0002-7-4** [Snelson, Richard])

Comment: Nuclear energy is also a smart economic choice. Constructing plants has the ability to employ about 4,000 people at its highest rate of construction, and then it employs about 500 specialized jobs, like Victor's, who came to the Pipeline Program at Miami-Dade. (**0002-9-3** [Martinelli, Tom])

Comment: Another great reason to consider building two new reactors would be to imagine just how many jobs it would create. In a downed economy such as this, jobs are a hard thing to come by; but upon the unveiling of two nuclear reactors, a significant job growth is to be expected -good jobs to boot, not just a medley of entry level positions. This will in turn spike the cash flow in the South Florida area and analogously pass on to corporate and private businesses alike. (0003-4-4 [Accursio, James])

Comment: In addition to jobs, it will also stimulate the economy by commencing the required construction spending to the county which thusly stimulates millions of dollars in property tax. These taxes are passed on to schools, colleges, educational institutions, economic growth firms, and many other governmental organizations; giving them the financial injection they need in these hectic times. (**0003-4-5** [Accursio, James])

Comment: Ensure the full scope of the proposed project's fiscal impacts is calculated. The location of the plant; transmission lines and associated facilities; the rate increase, which is proposed to precede the actual construction phase of the project; and additional direct costs that will be incurred by Miami-Dade County and its municipalities (including but not limited to fire, police; etc) over the life of the project should be taken into account and be incorporated into economic and fiscal analyses. (**0019-1** [Hamilton, Karen])

Comment: Ensure the economic benefits of the proposed expansion project, such as employment and capital expenditures, are realized by the residents of South Florida. (**0019-2** [Hamilton, Karen])

Response: The expected socioeconomic impact of building and operating proposed Turkey Point Units 6 and 7, including impacts on local employment and earnings, local tax revenues, in-migration, local infrastructure, and public services will be presented in Chapters 4 and 5 of the EIS. The cumulative impacts of the proposed action and other past, present, and reasonably foreseeable actions will be presented in Chapter 7.

Comment: So what that means is, that we're not going to have massive amounts of people, like we do now, going to Jackson Hospital and other community hospitals that have no health insurance, putting the burden back on the taxpayers to be able to furnish health insurance for

these people. There is an endless line of people who are retired that have no income, waiting on Section 8 housing and other types of housing that they can get into and live in the twilight of their years. This will, in a lot of cases, prevent that from happening. (**0002-13-4** [Simpson, Roce])

Response: The expected impact of building and operating proposed Turkey Point Units 6 and 7 on the capacity use of local medical services will be evaluated in Chapters 4, 5, and 7 of the EIS.

Comment: To be more specific to the lodging industry, which I'm part right now, this power plant would produce a stabilizing effect on the local economy. It will compliment the tourism industry. And as maybe you know this, especially people from FP&L, refueling takes place every 18 to 24 months for each reactor and brings several hundred workers from outside the local area who stay in the hotels, motel, and eat in our local restaurants. Each reactor alternates its refueling schedule, usually resulting in at least one refueling or significant equipment installation per year, typically for us during a slack part of the tourist season. (**0001-18-5** [Landeta, Hector])

Response: The impacts on the economy and infrastructure, including recreation and housing, will be addressed in Chapters 4, 5, and 7 of the EIS.

Comment: You say that tourism is going to be affected because people coming to work here are going to need hotels and restaurants. But I thought you said that you wanted to create jobs for people who already live here, so we should not be talking about tourism because it's already affected enough by the Gulf oil spill. (0001-19-8 [Ryan, Megan])

Response: The impacts of building and operating proposed Turkey Point Units 6 and 7 on both local and in-migrating labor and indirect impacts of job creation on the local economy will be addressed in Chapters 4, 5, and 7 of the EIS.

Comment: Regarding the ability to have jobs and provide jobs for the area. Right now Miami-Dade College offers an internship program in nuclear power and practice. And interns right now from Miami-Dade College working at the FP&L Plant at Turkey Point are making \$19 to \$20 an hour as an intern before they even set foot on the property as a full-time licensed person. So, you know, what I think is marvelous is that they are a good partner; they run a very safe, very secure practice. And the expansion I think only solidifies our future as a great, great place to live, that being Homestead/Florida City down here. (**0001-20-5** [Daley, Dennis])

Comment: Turkey Point has had a growing demand for highly-skilled workers, and we understand that they could soon experience workforce shortages, largely due to retirements. As a result we, together, developed an Associate in Science Degree program in electrical power technology. And I would be here to tell you this today, that that program has been extremely successful. It was targeted for a very diverse population of incumbent workers at Florida Power

and Light Turkey Point and our college students. Graduates from this program meet the qualifications to work in positions in nuclear and non-nuclear facilities. To date we have had 63 students to graduate from the program. And I might add that the program began in 2006. Of those 63 graduates, 36 are currently working at Turkey Point and 20 are in the process of being hired. This has truly been a success story for Florida Power and Light and Miami-Dade College. It has enriched our community. (0001-4-2 [Jacobs, Jeanne])

Comment: Briefly I would like to discuss training with you. For this undertaking of the construction of Units 6 and 7, we're looking at jobs for over 4,000 building tradesmen. Building tradesmen within the State of Florida who are either licensed by their trade and/or have the training that is necessary to go out and build this facility correctly, on budget, and on time. I can speak on behalf of the Florida Carpenters, that we do not send a single person out to that plant for any piece of operation that is not properly credentialed and trained. And I can also tell you that the rest of the building trades, that's their same philosophy. (0001-8-3 [Johnson, Michael])

Comment: Along with the fact that we're going to be able to provide these jobs for working men and women during the time of construction, a lot of young people will go out there on those particular projects and be trained with a skill in a technical high-level industry and be able to take those skills back out into the community and be able to work on other projects and sustain their families for the rest of their lives. And in addition to that, for those of you that don't realize it, once these plants are built that's not the end of it. People will go back on a regular basis to maintain, update, and upgrade these plants. It's a system that is good for the community, good for the workers. (0002-13-5 [Simpson, Roce])

Response: Impacts on local employment will be addressed in Chapters 4, 5, and 7 of the EIS.

Comment: I do want to say that I think the whole discussion of the jobs that might be brought to this community, it is and should be irrelevant to an environmental study. I know that there is a socioeconomic aspect of it, and we're going to be addressing the socioeconomic, again very adverse impacts if the transmission lines were to go along the U.S. 1 corridor. (**0001-21-7** [Lerner, Cindy])

Comment: I can understand that folks in Florida City and Homestead may be interested in grabbing that relatively small amount of jobs that could come from an investment that's focused down here. But speaking regionally, of course, that's money that's taken out of the hides of everyone in the rate base. If it came right down to trying to make more jobs, well, with this amount of money I figure we could build about 50 new sports arenas for billionaire ball teams and the Heat, I think they deserve a new arena by now. That other one is getting old and they've got these three new players. It's not just about jobs. And I think in reality that should pretty much be out of scope for our discussion. (**0001-24-5** [Harum-Alvarez, Albert])

Response: The Council on Environmental Quality guidance for implementing NEPA includes a discussion of economic or social effects when these are interrelated with natural or physical environmental effects. NRC guidance for implementing NEPA includes the analysis of employment impacts from construction and operation activities (including transmission lines) among the socioeconomic impacts to be analyzed in environmental reviews of nuclear power plants. The socioeconomic impacts of construction and operation of proposed Turkey Point Units 6 and 7 will be assessed in Chapters 4, 5, and 7 of the EIS.

Comment: And, by the way, all the folks that are up here talking about jobs. I took a job about a month ago with a solar company installing solar installation panels on a ranger station in Biscayne National Park. That is as blue collar a job as any blue collar work I've ever done; it's construction work; it's electrical work; it's roofing; it's tiling. It's blue collar work, it produces lots of jobs. People sometimes think solar is people going up to a rooftop and meditating on the sun or something like that. It's nothing to do with that. It's the construction trades installing solar panels which are existing right now. The jobs that this plant will create are located in Homestead. If we did solar on rooftops throughout the service area of FP&L, we would be creating jobs throughout their entire service area. That's a big consideration. (**0002-14-4** [Schwartz, Matthew])

Response: Alternative energy sources, including solar power, will be discussed in Chapter 9 of the EIS.

Comment: People come to South Dade to go to Everglades National Park or Biscayne National Park. Business in the area benefit from that tourism and provide services to people who are going to visit those parks. So people will be affected and the locals in that way as well. (**0002-16-3** [Shlackman, Mara])

Comment: Construction of transmission towers and access roads in either corridor could impact visitor experiences. Heavy equipment including dump trucks, bulldozers, excavators and cranes would be used for construction of transmission lines. Qualities of the existing visitor experience such as primitiveness and solitude may be impacted. (**0025-3-38** [Kimball, Dan] [Lewis, Mark])

Comment: Natural vistas provide park visitors with an immediate and lasting sensory experience that strongly conveys the character of a national park. The proposed transmission lines, towers and associated roads could adversely affect the visitor's appreciation of the visual viewshed over large areas. The transmission lines and structures would be visible within the park for many miles away. Because of the flat topography and the broad unobstructed vistas, visitors on the Tamiami Trail, and to a lesser extent, visitors to Shark Valley and the Chekika areas, as well as visitors on airboat tours, would be able to see the transmission lines and structures. The transmission facilities would be an intrusion on the natural scenery of the Everglades and detract from the visitors' ability to appreciate the park. For visitors near the L 31-
N canal, the towers and transmission lines would dominate the viewshed. These impacts would be permanent. A separate viewshed analysis should be prepared for scenic and visual impacts on the visitor experience. (0025-3-39 [Kimball, Dan] [Lewis, Mark])

Comment: Similar impacts to viewsheds could occur elsewhere in the Western Transmission Corridor in Water Conservation Area 3B, north of the park, the Southern Glades Management Area, east of the park and in the Model Lands between U.S. 1 and the Turkey Point site. (**0025-3-40** [Kimball, Dan] [Lewis, Mark])

Comment: Short-term impacts would be expected from construction and maintenance activities and transmission line monitoring overflights. A corona effect from the proposed new lines (audible noise) may increase in the long-term. (**0025-3-46** [Kimball, Dan] [Lewis, Mark])

Response: The expected impact of building and operating proposed Turkey Point Units 6 and 7 on local recreational areas, including Everglades National Park and Biscayne National Park, will be assessed in Chapters 4, 5, and 7 of the EIS.

Comment: 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. (**0022-4-16** [Reynolds, Laura])

Response: This potential impacts of building and operating proposed Turkey Point Units 6 and 7 on employment and the effects of job creation on the local infrastructure and public services will be discussed in Chapters 4, 5, and 7, based on the affected environment described in Chapter 2. The EIS will include citations for documents used in its preparation.

Comment: Transportation Subsection indicates that the Homestead Extension of Florida's Turnpike (SR 821) and South Dixie Highway (US 1/SR 5) are the major transportation corridors for north-south movement in Miami-Dade County. The traffic impact data and analyses presented in Appendices 10.7.4.1 (Traffic Study Peak Construction) and 10.7.4.2 (Traffic Study Operations Analysis) does not consider the impact of the construction and operation of Units 6 and 7 on these two regional corridors. (**0023-2-23** [LaFerrier, Marc])

Comment: The assertion that the proposed access road from the Turkey Point Units 6 and 7 site to theoretical SW 137 Avenue along theoretical SW 359 Street will be improved within the transmission line right-of-way is premature. The traffic studies contained in Appendices 10.7.4.1 and 10.7.4.2 do not consider other alternative roadways such as SW 344 Street and transportation demand management strategies. (0023-2-24 [LaFerrier, Marc])

Comment: [Miami-Dade County Planning and Zoning] staff have the following concerns regarding the traffic study: the assumptions; the methodology; the impact study area; the lack of

consideration of alternative roadways including SW 328 Street and SW 344 Street; and the lack of consideration of transportation demand management programs to reduce the overall traffic demand and use of single occupant vehicles. (**0023-2-25** [LaFerrier, Marc])

Comment: The consultant should identify the programmed transportation projects located within the Study Area for roadways and intersections listed in the 2010 Transportation Improvement Program (TIP); and identify the planned transportation projects located within the Study Area listed in Priority I, II and III of the 2030 Long Range Transportation Plan. (0023-2-26 [LaFerrier, Marc])

Comment: The expected increase in non-development traffic and traffic from other previously approved and unbuilt development should be accounted for in the future years. (**0023-2-27** [LaFerrier, Marc])

Comment: Prior to the assumption of new roadway construction (SW 359 Street), traffic impact analyses with the existing and improved existing roadways for concurrency year (usually 3 years in the future), construction opening year (2011), construction peak year (2016) and normal operational year (2020) should be provided. (**0023-2-28** [LaFerrier, Marc])

Comment: Please note that LOS standards for roadways outside UDB are different than within UDB (**0023-2-29** [LaFerrier, Marc])

Comment: Include bicycle facilities as part of the road construction. (0023-2-4 [LaFerrier, Marc])

Comment: Options for shuttle service should be explored. (0023-3-1 [LaFerrier, Marc])

Response: These comments refer to the SCA submitted to the State of Florida by FPL, but they indicate an interest in the potential impacts of the proposed plant on transportation. The potential impacts of building and operating proposed Turkey Point Units 6 and 7 on transportation will be discussed in Chapters 4, 5, and 7, based on the affected environment described in Chapter 2.

Comment: Application does not supply sufficient design and placement information on Eastern corridor and location-specific pole placement to determine whether this activity is well designed and conducive to both pedestrian and transit use, and architecturally attractive. (**0023-3-34** [LaFerrier, Marc])

Response: This comment refers to the SCA submitted to the State of Florida by FPL, but it indicates an interest in the potential impacts of the proposed transmission lines on land use, transportation, and aesthetics. The potential impacts of building and operating the transmission lines on land use, transportation, and aesthetics will be discussed in Chapters 4, 5, and 7, based on the affected environment described in Chapter 2.

Comment: The proposed access roads are outside the existing site of the FPL power plant and are therefore subject to land use/zoning consistency determinations. Such access roadways will be subject to amendments to the Comprehensive Development Master Plan (CDMP). (**0023-1-53** [LaFerrier, Marc])

Comment: Application fails to consider the County's Greenway Plans and Parks and Open Space System Master Plan. The County's Preferred Corridor for the proposed Biscayne Trail Segment D and a portion of the southern route of the Biscayne-Everglades Greenway IS located along the north side of SW 328 St. (North Canal Dr.). (**0023-2-2** [LaFerrier, Marc])

Comment: The County's Preferred Corridor for the Biscayne Trail north-south leg is located along SW 137 Av. from SW 328 Av. to Card Sound Rd. The County's Preferred Corridor for the southeastern leg of the Biscayne Trail also extends southeast along the L-31 E canal from SW 328 St. to Card Sound Rd. (**0023-2-3** [LaFerrier, Marc])

Comment: Information is not provided on how activities will impact approved Urban Centers and their respective Regulating Plans and will be in compliance with the County's Urban Design Manual. (0023-3-36 [LaFerrier, Marc])

Response: These comments refer to the SCA submitted to the State of Florida by FPL, but they indicate an interest in the consistency of proposed Turkey Point Units 6 and 7 with existing zoning and land use plans. The general consistency of building and operating the proposed units with existing zoning and land-use plans will be discussed in Chapters 4, 5, and 7.

Comment: [A]pparently this would represent for the economy, after the 40 years of the building when the two plants are finally working, savings in energy costs for about \$90 million. So, we believe this is very important. We have analyzed the project and realize that when the two plants that will be built here at Turkey Point are finally constructed, this will afford us the things that we need in order to have a better future. We, thus, once again, applaud FPL for its vision and for the time that it has invested in providing us with a better opportunity for our future. (**0002-10-3** [Alexander, William])

Response: This comment refers to savings in fuel costs projected for the life of the proposed project as part of the State of Florida's Determination of Need. Need for power will be addressed in Chapter 8 of the EIS. The expected socioeconomic impact of building and operating proposed Turkey Point Units 6 and 7, including impacts on local employment and earnings, local tax revenues, in-migration, local infrastructure, and public services, will be discussed in Chapters 4, 5, and 7.

Comment: The plant is there. Fortunately we've had the plant. It's the Government's idea of trying to provide South Florida power has made us where we've grown to this point, where we have this power, where we have the development that we have. Okay. We have to keep going.

It's not going to stop unless we put doors up there on the county line that says, we can't move anybody else in here. I don't see any difference between a plant down there and using the water, okay, or another 40,000 people moving into Dade County every two years. (**0002-12-5** [McHugh, John])

Response: This comment suggests impacts on resources such as water would occur independently of the units. Impacts on water and other resources will be discussed in Chapters *4*, *5*, and 7 of the EIS.

12. Comments Concerning Historic and Cultural Resources

Comment: This office reviewed the referenced project for possible impact to historic properties listed, or eligible for listing, in the National Register of Historic Places. The review was conducted in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, 36 CFR Part 800: Protection of Historic Properties and the National Environmental Policy Act of 1969, as amended. In October 2008, December 2008, - March, 2009, and April 2009, Janus Research conducted an archaeological and historical Phase I survey of the proposed Turkey Point Units 6 & 7 site, associated non-linear facilities, and spoils areas on plat property on behalf of the Florida Power & Light Company. Janus Research identified no cultural resources within the project area during the investigation. Our office found the-submitted report complete and sufficient in accordance With Chapter 1 A-46, Florida Administrative Code. Based on the information provided, it is the opinion of this office that the proposed development will have no effect on historic properties. However, we also concur with Janus Research that, prior to construction, an unanticipated finds plan should be developed to outline the procedures and identify personnel to be contacted if significant archaeological material or human remains are encountered during construction. In 2009, Janus Research conducted background research to identify previously recorded archaeological resources within 100 feet and historic cultural resources within 500 feet of the associated linear facilities, and to identify areas of high, medium, and low probability for the presence of unrecorded cultural resources. (0013-1 [Kammerer, Laura])

Comment: Of particular concern would be design compatibility related to shadows, traffic, height, bulk and scale of architectural elements and how pole placement and design will address these standards. (0023-3-32 [LaFerrier, Marc])

Comment: Design details, including proposed materials, visual buffering, complementary vegetation, and fencing must be addressed to determine consistency with LU-4D for each proposed new pole and corridor alignments generally. (**0023-3-33** [LaFerrier, Marc])

Comment: Archeological surveys of the entire West Transmission Corridor will be needed. An archeological survey conducted in 2009 in FPL's West Preferred Corridor within ENP found no evidence of prehistoric humans. (**0025-3-41** [Kimball, Dan] [Lewis, Mark])

Comment: Our utmost concern will be to ensure that areas of archaeological importance will be indentified and protected from any ground disturbing activities, and that all designated historic sites and structures, as well as those eligible for designation, will be identified, documented and protected from any new construction or view shed obstruction associated with both the new on-site structures and the transmission line corridors and related structures. (**0026-1** [Kauffman, Kathleen])

Response: The potential impacts of building and operating proposed Turkey Point Units 6 and 7 on historic and cultural resources will be discussed in Chapters 4, 5, and 7, based on the affected environment as described in Chapter 2. The EIS will include citations for documents used in its preparation. As stated in the application, an unanticipated-finds plan will be developed.

Comment: The application states that the Florida Master Site File forms (FMSF) maintained by the Bureau of Historic Preservation, Division of Historical Resources were reviewed to determine whether any historic or archaeological sites were in the areas of potential effects. However, the County's Office of Historic and Archaeological Resources was not given the opportunity to determine whether these areas impacted locally designated sites or sites which have been determined as eligible for designation. In addition, the application makes the assumption that the probability of impacts on undiscovered sites is considered extremely low. This conclusion is not supported without coordination with the Office of Historic and Archaeological Resources. Sites that the County has surveyed and identified, but may have not yet designated, would not necessarily be recorded in FMSF forms. (0023-2-1 [LaFerrier, Marc])

Response: The potential impacts of building and operating proposed Turkey Point Units 6 and 7 on historic and cultural resources will be discussed in Chapters 4, 5, and 7, based on the affected environment described in Chapter 2. The information sources from the Miami-Dade County Office of Historic and Archaeological Resources will be considered in this assessment. The EIS will include citations for documents used in its preparation.

Comment: We are aware that the Department of State's Division of all Historical Resources has already made recommendations. We concur with those recommendations and also offer the following:

- 1. For all areas that have not been previously surveyed, our staff shall be notified once surveying has commenced. The County archaeologist will have the opportunity to comment on any new visual surveys performed to determine areas of high archaeological probability.
- 2. We concur with the development of an unanticipated finds plan, and request that the Office of Historic and Archaeological Resources be added to the contact list, should a find occur.
- 3. View sheds and view corridors shall be considered during the identification of the Area of Potential Effect as part of the surveys for potential impacts to historic sites and structures.

- 4. Copies of all new FMSF forms, created as a result of historic or archaeological resource surveys, shall be provided to our office.
- 5. The Office of Historic and Archaeological Resources shall have the opportunity to review and comment on any survey findings related to historic resources or eligible resources that are found within or in close proximity to the transmission line corridors.
- The Office or Historic and Archaeological Resources shall be included in determining the Area of Potential Effect (APE) and shall be permitted to review and comment on any additional reconnaissance level historic resource surveys conducted in such areas. (0026-2 [Kauffman, Kathleen])

Response: The potential impacts of building and operating proposed Turkey Point Units 6 and 7 on historic and cultural resources will be discussed in Chapters 4, 5, and 7, based on the affected environment described in Chapter 2. The EIS will include citations for documents used in its preparation. The Florida State Historic Preservation Office and Miami-Dade County will be consulted in accordance with the National Historic Preservation Act.

13. Comments Concerning Meteorology and Air Quality

Comment: In addition, we would like you to consider in the environmental impact statement, the impacts that 30 million gallons a day of steam being released into the atmosphere could have on wildlife, Biscayne Bay, and, of course, agriculture (**0001-7-7** [MacLaren, Kaitlin])

Comment: According to FPL information, the six cooling towers for TP 6&7 will evaporate 41.5 MGD of water which will be .0005% particulates. That is 20,750 gallons of particulates 24/7. The FPL model diagram shows the dispersion of that vapor in a neat pattern around the plant assuming average wind conditions. However, the average does not fully reflect the many days down here when the wind blows from the SE at 15 to 25 MPH for hours on end. That would carry the now condensed and concentrated residue of TP over the people and the crops to the west and northwest. (**0016-2** [White, Barry])

Comment: [T]he effect of aerial dispersal of biocides from the cooling towers on surrounding areas, including surface and groundwater. (**0023-1-16** [LaFerrier, Marc])

Comment: The atmospheric deposition from the cooling towers is projected to extend into the surface waters of Biscayne National Park. Atmospheric deposition rates and for EPOCs from the proposed cooling towers should be quantified and include incremental projections over the life span of Units 6&7. (0025-3-25 [Kimball, Dan] [Lewis, Mark])

Response: The reactor cooling system including the water treatment, its operation and steam released to the atmosphere, and associated salt drift and other potential impacts of the cooling-system operation will be discussed in Chapter 5 of the EIS.

Comment: Construction related emissions and other temporary or secondary emissions are not included in the PSD emissions analysis. The impacts from these activities on air quality should be discussed qualitatively in the Draft EIS. Air emissions of criteria and toxic pollutants should be addressed. A discussion of the designation status of the area in which the units will be built should also be included in the document. Finally, the Draft EIS should discuss any issues or concerns regarding obtaining the required Title V operating permit once the units are operational. (**0014-21** [Mueller, Heinz])

Comment: Please state the cumulative emissions of construction activities for each of the greenhouse gases including water vapor, carbon dioxide, methane, nitrous oxide, and ozone. (**0022-4-3** [Reynolds, Laura])

Comment: Please state the cumulative emissions of operation activities for each of the greenhouse gases including water vapor, carbon dioxide, methane, nitrous oxide, and ozone. (**0022-4-4** [Reynolds, Laura])

Response: Environmental impacts associated with building and operating nuclear plants, including greenhouse gas emissions, will be addressed in EIS Chapters 4, 5, and 7, respectively. Greenhouse gas emissions associated with the fuel cycle will be presented in Chapter 6. A discussion of the status of air quality in the area will be presented in Chapter 2.

Comment: Nuclear plants also do not operate well in hot conditions, as evidenced by recent instances in the US and France where nuclear plants shut themselves down, due to high temperatures in the environment. (**0021-11** [Wilansky, Laura])

Response: The reactor cooling system, including the water-source treatment and heat dissipation during operation, will be discussed in Chapter 3 of the EIS. The potential impacts of the cooling-system operation will be addressed in Chapter 5 of the EIS. The existing climatological conditions and projected change in temperature over the licensing period will be discussed in Chapter 2.

Comment: 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. (**0022-2-1** [Reynolds, Laura])

Comment: 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 (**0022-4-2** [Reynolds, Laura])

Comment: There is concern that constituents in the cooling water will be emitted in the aerosol/drift exhaust from the cooling towers.... (**0023-1-26** [LaFerrier, Marc])

Comment: Provide technical discussion and analysis of the effect that the cooling tower (heat transfer) process has on the reclaim water constituents and the facility's air emissions (both criteria and hazardous air pollutants). Source water analysis constituents to be addressed include: total dissolved solids, total suspended solids, salinity, organics, metals, and 'EPOCs' (emerging pollutants of concern) addressed in USGS 2006 Report identifying organic wastewater compounds, pharmaceutical compounds, antibiotic compounds, and hormones detected in effluent from the South District WW Treatment Plant). In addition to PM and PM10, provide emissions calculations for other criteria pollutants and hazardous air pollutants. (**0023-1-28** [LaFerrier, Marc])

Comment: The COL proposes the use of tertiary treated wastewater as the primary cooling water supply source for Units 6&7. The environmental risk associated with the aerial dispersal and possible subsurface release of micro-constituents, sometimes referred to as Environmental Pollutants of Concern (EPOCs), commonly associated with treated waste water requires further evaluation. Treated wastewater from municipal sewage commonly includes pharmaceuticals and personal care products (PPCPs), as well as various endocrine disrupter compounds (EDCs), and frequently heavy metals and other contaminates not normally removed in tertiary treatment. (**0025-2-3** [Kimball, Dan] [Lewis, Mark])

Response: Potential impacts to the aquatic and terrestrial ecology environment, via the air pathway impacts associated with cooling tower "drift" as a result of using reclaimed water in the cooling towers, will be discussed in Chapters 5 and 7 of the EIS, based on the affected environment as described in Chapter 2.

Comment: 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 atmosphere. 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 atmosphere. (0022-2-16 [Reynolds, Laura])

Response: The reactor cooling system, including the water-source treatment and heat dissipation, will be discussed in Chapter 3 of the EIS. The potential impacts of the cooling-system operation on the frequency of plume visibility will be addressed in Chapter 5 under meteorology and air quality. The affected atmospheric environment, including temperature and moisture, will be discussed in Chapter 2.

Comment: 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. (0022-2-18 [Reynolds, Laura])

Response: The impacts of operating proposed Turkey Point Units 6 and 7 on local meteorology will be presented in Chapter 5 of the EIS. The staff will consider in its evaluation whether more remote potential meteorological impacts from the plant are likely. However, past experience with large power stations would indicate that there would be no impact to the formation, intensity, or longevity of tornados and hurricanes.

Comment: The application does not provide sufficient information to determine facility emissions for the limestone mining operations and grading & fill activities. (**0023-3-16** [LaFerrier, Marc])

Response: Environmental impacts associated with building proposed Turkey Point Units 6 and 7 will be addressed in Chapter 4 of the EIS. The impacts of building-related air emissions, including those from activities at FPL-owned fill sources and from grading and fill activities, will be estimated.

Comment: Applicant needs to provide information sufficient to determine whether open burning operations would be consistent with the requirements of Chapter 24. (**0023-4-7** [LaFerrier, Marc])

Response: Environmental impacts associated with building proposed Turkey Point Units 6 and 7 will be addressed in Chapter 4 of the EIS. The building-related air emissions and related impacts on air quality, as well as the emissions from any open burning of vegetation, will be estimated.

Comment: The application provided insufficient details related to the General Purpose Diesel Engines on what equipment the engines are to service or what fuel tanks and day tanks will be associated with the engines. (**0023-4-8** [LaFerrier, Marc])

Comment: Construction and maintenance activities would impact air quality. (**0025-3-45** [Kimball, Dan] [Lewis, Mark])

Response: Environmental impacts associated with building and operating proposed Turkey Point Units 6 and 7 will be addressed in EIS Chapters 4 and 5, respectively. Emissions associated with diesel fueled engines will also be discussed in Chapters 4 and 5.

14. Comments Concerning Health – Nonradiological

Comment: These two gigantic, enormous 1,000 megawatt each nuclear generators are going to be cooled with recycled sewage. Let's say that, recycled sewage. That's what's going into these cooling towers. There's no way to get all the pharmaceuticals, all the chemicals that we flush down our toilets, out of that water that's going to be going through these plants. When that water goes through the cooling towers they're going to be released to steam, droplets are coming out with that water vapor, and lots of stuff is going to be in those droplets. Lots and lots of those chemicals are going to be in those droplets. And that's going to be sprayed out over Biscayne National Park, Biscayne Bay, and the City of Homestead, which already has extremely dubious air and water to begin with for many of the reasons people have talked about. (**0002-14-7** [Schwartz, Matthew])

Comment: And what about the workers at the plant who will have to breath that stuff 8 hours a day? What would OSHA say about that? And the particulates will be a concentration of every carcinogen known to man, having come originally from waste water. What TP 6&7 really is is the best still in the world for concentrating the highest amount of pollutants and efficiently distributing it over the land. (**0016-3** [White, Barry])

Comment: 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. (**0022-1-15** [Reynolds, Laura])

Comment: 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. (0022-1-18 [Reynolds, Laura])

Comment: 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. (**0022-1-20** [Reynolds, Laura])

Comment: 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. (**0022-2-2** [Reynolds, Laura])

Response: These comments concern the impacts of chemicals in the cooling tower drift from proposed Turkey Point Units 6 and 7 on the public and workers. The planned reactor-cooling

system, including the use of reclaimed water and saltwater, along with water treatment, the expected vapor and droplet release to the atmosphere and associated "drift," and associated potential impacts, will be discussed in Chapter 5 of the EIS. These impacts will be assessed within the context of the affected environment described in Chapter 2. Cumulative impacts from past, present, or reasonably foreseeable future actions will be discussed in Chapter 7, and alternatives to the proposed cooling system will be discussed in Chapter 9. The EIS will include citations for documents used in its preparation.

Comment: I've also heard that transmission lines would buzz, cause radiation problems that may cause cancer, especially breast cancer, in a lot of people, as well as that it might go through our Everglades as well as down US-1. (0002-8-6 [O'Katy, Jessica])

Comment: [CASE submitted an article titled, "Recent Biomedical Literature on Health Risks of Power Transmission Lines" by Philip Stoddard, Dept Biological Sciences, Florida International University. The article expressed concern about exposure to magnetic fields.] (**0003-2-1** [White, Barry])

Comment: Information on the potential degradation of health, safety, tranquility, character, and overall welfare of residential neighborhood conditions with respect to transmission line corridors has not been provided. Information should include recent academic studies regarding EMFs and high kV electrical transmissions. (0023-3-35 [LaFerrier, Marc])

Comment: The health of our children and families will be in grave danger! Peer reviewed medical literature shows Alzheimer's and senile dementia rates are doubled in people living near power lines. (**0031-3** [De Villiers, Elena])

Response: These comments concern the impacts of living near transmission line corridors. Health and/or other impacts from noise, electromagnetic fields, and/or land use associated with the planned upgrade and construction of transmission lines will be addressed in Chapters 4 and 5 of the EIS, based on the affected environment described in Chapter 2. Cumulative effects will be addressed in Chapter 7.

Comment: Areas surrounding the Turkey Point nuclear power plant are at high risk for exposed pollutants, including asbestos, mercury, and 174 detected carcinogens including tritium which was found to be leaking from over a quarter of all nuclear plants in the United States. Expanding the ground that Turkey Point inhabits would bring these pollutants closer to the National Park reserve areas, bringing endangered and rehabilitated marine life and ecology into severe danger. (**0007-4** [Burris, Jessica])

Response: This comment concerns the potential impacts on biota of pollutants released from proposed Turkey Point Units 6 and 7. The ecological health impacts of radiological and non-radiological releases from nuclear power plants during building and operating the proposed

units will be discussed in Chapters 4 and 5 of the EIS, respectively, within the context of the affected environment described in Chapter 2. The cumulative impacts from the proposed action when added to those of past, present, or reasonably foreseeable future actions will be discussed in Chapter 7.

Comment: Consider the full the impacts of noise and light pollution concerns to people, animals, native plants and wetlands, environmentally endangered lands, and provide the appropriate mitigation strategies. (**0019-6** [Hamilton, Karen])

Comment: Potential soundscape impacts may increase over current levels in Biscayne National Park from construction, operation and security (additional overflights by military jets). These impacts should be assessed and quantified. (**0025-3-28** [Kimball, Dan] [Lewis, Mark])

Response: These comments concern the potential impacts of noise and light in the environs of proposed Turkey Point Units 6 and 7. The potential impacts of noise and light pollution on the public and the environment during the building and operating of the proposed units will be addressed in Chapters 4 and 5 of the EIS, respectively, within the context of the affected environment described in Chapter 2. Cumulative impacts from the proposed action when added to those of past, present, or reasonably foreseeable future actions will be discussed in Chapter 7.

Comment: The generation of hazardous wastes (as defined in Section 24-5) and other regulated non-hazardous wastes is mentioned throughout the application. The size of tanks or containers is not specified nor their locations, nor details of the release detection methods or pollution prevention measures to be implemented. (**0023-1-11** [LaFerrier, Marc])

Response: This comment concerns the management of hazardous and non-hazardous wastes for proposed Turkey Point Units 6 and 7. The impacts from the generation, handling, and disposal of hazardous and non-hazardous waste material from building and operating the proposed units will be addressed in Chapters 4 and 5 of the EIS, respectively, within the context of the affected environment described in Chapter 2. Cumulative impacts from the proposed action when added to those of past, present, or reasonably foreseeable future actions will be discussed in Chapter 7.

15. Comments Concerning Health – Radiological

Comment: The NRC knows full well that in 1988 and 1990, Congress passed the Radiation Exposed Veterans Compensation Act and stipulated that 21 categories of cancer are attributable either as a causative or contributory factor to the exposure to ionizing radiation from radioactive fallout. The NRC knows full well that induced genetic damage and genetic mutations are precursors from manifesting over 21 categories of cancer as stipulated by the Congress. The NRC knows full well that cancer is a genetic process and that ionizing radiation

causes genetic damage and that genetic damage and cancer are inextricably intertwined. You cannot separate the two. However, the NRC disingenuously avoided mention in its supplemental environmental impact statement of August 2007, in a Diablo Canyon license proceeding, that small children -- they omitted this -- that small children, pregnant women, women of childbearing age, and the elderly are seriously impacted and vulnerable to acquiring induced genetic damage from exposure to ionizing radiation of a magnitude as little as 5 rems. Now, because of the concerns linking ionizing radiation to genetic damage, the Atomic Energy Commission provided the initial funding for the Human Genome Project. Most people don't know that. That Project today is jointly funded by your parent organization, the Department of Energy, and the National Institutes of Health. (0001-13-6 [Smilan, Stan])

Comment: The health effects on communities has not been adequately studied, and the presence of childhood leukemia clusters in the vicinity of nuke plants raises serious questions about the possible connections. It is to these curious questions about the environmental impacts on public health that I request that the NRC add to its scope of inquiry. (0001-16-4 [Showen, Steve])

Comment: <u>Public health</u> is ultimately what you affect most in your decision-making. We <u>can't</u> go back to FPL, or the M. Dade Com. College Homestead, or your members in our Capitol in 10 years and say please cleanse out our circulatory systems of our bodies and replace them. Vulnerable people depend on your <u>wisdom now</u> in history to choose the <u>safest</u> path for the citizens. (**0011-1** [, Anonymous])

Comment: We should not create the GUARANTEED RISK of radiation, toxic waste, birth defects, cancers, fish kills, and all the other consequences which can and will result from building Turkey Point 6 and 7. (**0021-14** [Wilansky, Laura])

Comment: I ask you to include the true costs of nuclear plants throughout their entire life cycle in your environmental calculations, including the reality of enormous risks to health and life. (**0021-19** [Wilansky, Laura])

Response: These comments concern possible health effects from radiation exposure. Chapter 5 of the EIS will address the potential radiation doses and the associated health effects from operation of proposed Turkey Point Units 6 and 7. The NRC's regulatory limits for radiological protection are set to protect workers and the public from the harmful health effects of radiation on humans. These radiation standards reflect extensive scientific study by national and international standard setting organizations and incorporate conservative assumptions and models to account for differences in gender and age so as to ensure that workers and all members of the public are adequately protected from radiation.

Comment: In addition, the public is largely unaware that radioactive emissions are permitted legally in normal operations of nuclear plants. Also, a number of nuke plants have leaked radioactive effluent into underground drinking aquifers. (**0001-16-3** [Showen, Steve])

Comment: I was looking at some of the documents you left in the back of the room. And in terms of tritium your own periodical says, nuclear power plants have reported abnormal releases of water containing tritium resulting in groundwater contamination. This is spooky stuff. And we would hope that any such releases would not go anywhere outside the boundary if such releases actually occur, and that information, if it's out there, would be immediately released to agencies that deal with water resources so we can deal with the potential implications as a result of such potential contamination. (**0002-3-7** [Walker, Tom])

Comment: One function of wetlands is to filter water as it runs through its natural ecosystem before reaching primary waterways where it is likely to be ingested. In addition to adding pollutants to the Biscayne area outside of Turkey Point with this proposed expansion the reduction of wetlands in the area will cause further harm by the natural reduction of water filtration before entering the surrounding communities. This includes the reduction of a filtration system for radioactive leakage present in groundwater leakage that is normally released from all U.S nuclear power plants. The NRC permits up to 400 gallons per day of low level leakage to be deposited into the environment surrounding nuclear power plants. Without wetlands to filter this pollution, residents of the surrounding area are directly vulnerable to this waste. (0007-5 [Burris, Jessica])

Response: These comments concern the potential release of radioactive material to the environment by proposed Turkey Point Units 6 and 7. Chapter 5 of the EIS will address the expected releases of radioactive material in liquid and gaseous effluents, the impacts of those releases on humans and biota other than humans, and the applicant's effluent and environmental radiological monitoring systems. The results of a licensee's radiological effluent and environmental monitoring systems are publicly available in the ADAMS Public Electronic Reading Room and are accessible at <u>http://www.nrc.gov/reading-rm/adams.html</u>.

Comment: [A]Iso just got my water report reading from Miami-Dade. And I found it interesting that not only was there uranium, which we don't have here in our water, but that the levels of it were much higher closer to Turkey Point than they were in Northern Miami. I thought that was very interesting. And when I read the reason for uranium being in the water, it said that it was from natural sources. So I found that to be extremely worrisome. (**0002-8-8** [O'Katy, Jessica])

Comment: Tritium and Strontium 90 are present in the area and research is currently being done to establish their levels and concentrations (**0012-8** [Payne, Nkenga])

Response: These comments concern the presence of radioactive materials in the environment near proposed Turkey Point Units 6 and 7. Chapter 2 of the EIS will address the current radiological environment at the proposed site for the proposed units.

Comment: Two new, unnecessary plants are guaranteed to bring more leaks and more radioactive waste to South Florida, and will endanger us that much more. (**0021-9** [Wilansky, Laura])

Comment: At the NRC scoping meeting held in July, a handout (USNRC BACKGROUNDER, February 2010) was available which stated that Nuclear power plants have reported abnormal releases of water containing Tritium, resulting in groundwater contamination. This is also discussed on your website under operating reactors. Obviously, the potential leakage of Tritium from the Turkey Point nuclear power plant is a concern to be analyzed. With this in mind, FKAA request that any Tritium test results from the existing cooling water canals and the aquifer system adjacent to these canals be released for review. If there has been leakage above the background levels in the existing system, continued rate of analysis should be required at more stations, and the source and remedy be found. Also, whether or not there is Tritium above background levels in the existing system, the EIS should include the requirement for continued measurements of Tritium at the interface of the reactors including water canals, strategic monitoring points, and downstream monitoring locations. (**0024-4** [Walker, Tom])

Response: These comments concern potential groundwater contamination by inadvertent leaks of liquids containing tritium from the Turkey Point site. Chapter 2 of the EIS will address the current radiological environment at the proposed site for proposed Turkey Point Units 6 and 7. Chapter 5 of the EIS will discuss the applicant's effluent and environmental radiological monitoring systems for the proposed units.

Comment: 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. (**0022-4-10** [Reynolds, Laura])

Comment: 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. (**0022-4-11** [Reynolds, Laura])

Comment: 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. (**0022-4-12** [Reynolds, Laura])

Comment: 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. (**0022-4-15** [Reynolds, Laura])

Comment: 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. (**0022-4-8** [Reynolds, Laura])

Response: These comments concern the radiological impacts of operation of proposed Turkey Point Units 6 and 7, including storage of low level wastes, release of liquid and gaseous effluents; and inadvertent pipe leaks. These impacts will be addressed in Chapter 5 of the EIS. The EIS will include citations for documents used in its preparation.

16. Comments Concerning Nonradiological Waste

Comment: The use of hazardous materials (e.g. treatment chemicals, solvents, paints, lubricants, etc.) is mentioned throughout the application for maintenance operations, water and wastewater (influent and effluent) treatment systems. The size of tanks or containers is not specified nor are their locations identified. In addition, no details of the release detection methods or pollution prevention measures to be implemented are provided. (**0023-1-60** [LaFerrier, Marc])

Comment: Liquid waste other than domestic sewage will be generated, used, and handled at the proposed facility which is not connected to sanitary sewer. The application did not provide sufficient information to evaluate the project with regard to requirements of Section 24-43.1 of the code of Miami-Dade County. (**0023-1-8** [LaFerrier, Marc])

Response: The generation, management, and treatment or disposal of nonradiological waste will be discussed in Chapters 4 and 5 of the EIS.

17. Comments Concerning Accidents – Severe

Comment: Miami-Dade is an extremely population dense area with 1158 people per square mile. Although FP&L and Westinghouse state that the probability of a severe accident is very low for the AP1000, this reactor design has never been built or operated anywhere in the world. (**0001-14-9** [Hancock, Mandy])

Response: This comment concerns the potential for severe accidents at proposed Turkey Point Units 6 and 7. The impacts of postulated accidents including severe accidents will be addressed in Chapter 5 of the EIS.

18. Comments Concerning the Uranium Fuel Cycle

Comment: With the addition of the nuclear power plant 6 and 7, it will be doubling the waste that's being stored out at Turkey Point. I ask the Nuclear Regulatory Commission, what is being done nationally for the storage of nuclear power plant waste? I don't see enough being done nationally for the storage and safety of this nuclear waste. (**0001-10-1** [Marinelli, Francis J.])

Comment: Waste is contained and moved, a potential problem. It is moved to Yucca Mountain that's sitting on a fault line. We are saying it's safe for now but the safety has not been proven. (**0001-11-5** [Amor, Valerie])

Comment: As the NRC is aware, FPL already operates three reactors here in Florida and is proposing to build two more. FPL also proposes to build an onsite storage facility to deal with the high level radioactive waste already overflowing in the spent fuel pools. This amount of radioactivity clustered in such a population-dense, hurricane-prone area could create significant safety and health concerns for Floridians. The NRC must address these cumulative impacts. (0001-14-8 [Hancock, Mandy])

Comment: Tons and tons of nuclear waste are already stockpiled at this plant right now. They were cited. They were fined recently by the Nuclear Regulatory Commission for failure to take care of that waste. There's no place to put it; by the way, there's no place to move it. (**0002-14-13** [Schwartz, Matthew])

Comment: I'd also like to say that from what I've learned at school, that uranium transportation and storage is very dangerous and not something that we should be risking people and the environment's well-being for. (0002-8-2 [O'Katy, Jessica])

Comment: I am not a nuclear scientist, but my understanding at this time is that the main concern regarding nuclear energy is how to safely store the waste material. If there is a scientific answer to this problem that is safe, I think America would be wise to pursue increasing our use of nuclear energy. (0005-2 [Bass, Ken])

Comment: [T]he economic and ecological risks associated with the entire nuclear power fuel cycle, are vast, including the long term of safeguarding nuclear waste produced at Turkey Point. (**0012-13** [Payne, Nkenga])

Comment: It is unacceptable to even think of disposing highly toxic and radioactive substances anywhere on or in our beautiful Earth as we do not know the consequences – and there is nothing to stopgap or in place in case these substances have a dire reaction on the earth. (**0028-5** [DiNuzzo, Laura])

Comment: On the surface, the "greener" than dirty coal theme sounds good. Given there are positives and negatives to most situations, this green theme would be the positive. However, all of us involved, including FP&L, would be remiss if we did not consider the negative. In this case, the negative is the stored, on site radioactive waste generated by the Turkey Point plant, and more reactors mean more radioactive waste. This negative must be factored into the greener theme to reflect the true cost of the nuclear facility. Has FP&L factored in this critical cost of how to dispose of radioactive nuclear waste, or will they just continue to store it on site (in a hurricane prone, sea level environment)? Will FP&L send it to an undetermined repository (if one is ever mandated) and at what cost? While the front end looks green, the back end looks dirty. Objectively, the big picture must be duly considered. Decisions that are narrow, short-sighted and reactionary lead to a vulnerable position that can escalate into insurmountable problems (think BP oil, Chernobyl, 3 Mile). Until the above mentioned negatives are resolved, expansion magnifies potential problems. (**0029-3** [Guendelsberger, Debra])

Response: These comments concern the transportation and disposal of high-level radioactive waste, such as spent fuel. The impact of the uranium fuel cycle, including disposal of high-level radioactive waste and spent fuel, will be addressed in Chapter 6 of the EIS.

Comment: That's just the tip of the iceberg. There are so many different aspects to a building of these two additional nuclear power plants at Turkey Point. When they built them in 1972 they had never heard of anything such as global warming, such as rising sea levels. Out of their consciousness. Presently, five miles from here is over 2 million pounds of nuclear waste. Five miles from here. As soon as the sea level covers all that up, God knows what's going to happen. (0001-2-4 [Harris, Walter])

Comment: When sea level rises, what's that going to do to a nuclear plant built in the middle of Biscayne Bay, with storage -- with nuclear waste that cannot be moved because there's nowhere to put it. So this is an extreme danger to our community. (**0002-14-8** [Schwartz, Matthew])

Comment: 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 meter. (**0022-4-13** [Reynolds, Laura])

Response: The environmental impacts of operating and decommissioning proposed Turkey Point Units 6 and 7, including potential impacts associated with sea level rise, will be considered in Chapters 5, 6, and 7 of the EIS.

Comment: One thing we should consider is, this is not an energy source that gives so-called energy independence. The great bulk of the uranium comes from outside the United States, and there are greenhouse gas emissions in the process of the extraction and processing of that uranium. (0002-16-5 [Shlackman, Mara])

Comment: In the big environmental picture, companies like FPL that want to build nuclear plants are trying to sell the idea that nuclear energy is a solution to global warming. In fact, the opposite is true. Nuclear energy is neither carbon-free nor emission-free throughout its entire life cycle, which includes a variety of wastes produced by mining uranium and making nuclear fuel, in addition to the aforementioned unsolved problem with spent fuel and other nuclear waste. This waste includes the plants themselves, which operate for a few decades, and then take, at a minimum, hundreds of years to be decommissioned. (**0021-10** [Wilansky, Laura])

Response: These comments concern the greenhouse gas emissions of the entire fuel cycle and the operation of proposed Turkey Point Units 6 and 7. The impacts of greenhouse gas emissions from the life-cycle of fuel production, construction, operation, and decommissioning of the units will be presented in Chapters 4, 5, and 6 and an appendix of the EIS.

Comment: We now have the technology to recycle spent nuclear rods. Look to France as a prime example as nuclear energy as a viable energy resource. (**0006-2** [Weins, Brian])

Response: This comment concerns the potential for recycling spent nuclear fuel. The potential environmental impacts of the fuel cycle from recycling only the uranium from spent nuclear fuel will be addressed in Chapter 6 of the EIS. Recycling uranium and plutonium from spent nuclear fuel will not be addressed in the EIS. While Federal policy no longer prohibits recycling, additional research and development is needed before commercial recycling of spent fuel from U.S. nuclear power reactors would occur.

Comment: I feel that uranium is not a long-term answer and so that expansion of Turkey Point would not start until a long term after we need it, and that it wouldn't last for that long because we do not have uranium here and we don't have enough of it. (**0002-8-7** [O'Katy, Jessica])

Response: This comment concerns the availability of uranium to fuel proposed Turkey Point Units 6 and 7. The irretrievable and irreversible commitment of resources, such as uranium, will be addressed in the context of the resources availability in Chapter 10 of the EIS.

Comment: I ask you to include the true costs of nuclear plants throughout their entire life cycle in your environmental calculations, including the cost of hundreds of years of plant

decommissioning; and the cost of nuclear waste storage for thousands of years to come. (**0021-21** [Wilansky, Laura])

Response: This comment concerns the cost of the entire fuel cycle including decommissioning and waste disposal. The costs of proposed Turkey Point Units 6 and 7 throughout their entire life cycle, including the costs of decommissioning and nuclear waste storage, will be discussed in Chapter 10 of the EIS.

19. Comments Concerning Decommissioning

Comment: This site will also be under SEVERAL FEET of water if global warming continues as it has, or worsens, as scientists predict. If you think killing an oil well is difficult underwater, try decommissioning a nuclear plant! (**0021-6** [Wilansky, Laura])

Comment: 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. (**0022-4-14** [Reynolds, Laura])

Response: The potential environmental impacts of decommissioning proposed Turkey Point Units 6 and 7 will be addressed in Chapter 6 of the EIS. The EIS will include citations for documents used in its preparation.

20. Comments Concerning Related Federal Projects

Comment: The Comprehensive Everglades Restoration Project is a major priority for the Federal and State Government. (**0002-6-4** [Grosso, Richard])

Comment: Models and study explaining how preliminary design of the water management project will tie to the CERP Environmental Restoration Project (Alternative O) missing. (**0023-3-9** [LaFerrier, Marc])

Comment: [The National Park Service has] identified a number of concerns regarding potential adverse impacts of the proposed facilities to the resources and values of Biscayne and Everglades National Parks, to regional water resources and to the Biscayne Bay Coastal Wetlands project, a component of the Comprehensive Everglades Restoration Plan (CERP). (0025-1-1 [Kimball, Dan] [Lewis, Mark])

Comment: The CERP Biscayne Bay Coastal Wetlands preferred plan, Alternative 0, includes plans to rehydrate wetlands in the vicinity of the proposed Turkey Point power plant site and poses a conflict with the COL application proposal to extract up to 124 million gallons per day from Biscayne Bay. The restoration project objective is to re-establish both overland freshwater

flow and subsurface flow, which is intended to improve ecosystem function by stabilizing seasonal salinity patterns. Therefore, it appears likely that the withdrawal of Biscayne Bay water for cooling water supply is incompatible with the restoration goals, since it will intercept a percentage of the freshwater intended for restoration. (0025-2-14 [Kimball, Dan] [Lewis, Mark])

Comment: The SFWMD is currently reviewing a Site Certification Application (SCA) for this project, pursuant to the State of Florida's Power Plant and Electrical Transmission Line Siting Act (Sections 403.501-403.539, Florida Statutes). During the SCA review process, the SFWMD has identified a number of issues that have the potential to result in significant adverse regional water resource-related impacts, including potential impacts to specific CERP projects and related restoration initiatives. (**0032-1** [Golden, James])

Comment: The SFWMD recommends that the following issues be addressed in the Environmental Impact Statement: Reclaimed Water Pipeline – The potential for adverse impacts to the CERP Biscayne Bay Coastal Wetlands Project. (**0032-18** [Golden, James])

Comment: The SFWMD recommends that the following issues be addressed in the Environmental Impact Statement: Electrical Transmission Lines – The potential for adverse impacts to the construction schedule for the U.S. Army Corps of Engineers (USACE) Seepage Management Pilot Project, which is a component of the CERP Project. The work on the USACE project will take place within the western levees of the SFWMD's L-30 and L-31N Canals, which are located within the West Preferred Corridor. The SFWMD is a participating partner with the USACE in this project. Work is scheduled to begin soon and may still be ongoing when FPL commences construction of the proposed transmission lines. (**0032-20** [Golden, James])

Response: The review team has been consulting with, and will continue to consult with, State and Federal agencies in preparing the EIS. The USACE is a cooperating agency on the development of the EIS and is a key agency in the implementation of the CERP. The cumulative impact of the proposed action when added to the impacts of other past, present, and reasonably foreseeable projects, including the CERP and proposed Turkey Point Units 6 and 7, will be considered in Chapter 7 of the EIS.

Comment: 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 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. (0022-1-13 [Reynolds, Laura])

Comment: Construction and operation of transmission lines, pads and access roads in either corridor within ENP is likely to adversely affect park operations such as fire management, exotic vegetation management and law enforcement. 2. Specific adverse effects to fire management would include increased fire activity due to the inherent threat of uncontrolled ignitions from transmission lines, limited accessibility to areas to engage in fire suppression activities due to gates and security issues on FPL land, and an increase in staffing levels based on fire danger rating. Transmission lines in either corridor would limit the park's ability to use aircraft for fire suppression in the area, especially along the eastern boundary. (**0025-3-42** [Kimball, Dan] [Lewis, Mark])

Comment: Inappropriate use of park lands could become an issue. Construction of access roads would introduce new areas for unauthorized all terrain vehicle use, dumping and other unforeseen uses which would result in adverse impacts to park law enforcement operations and sensitive natural resources. (**0025-3-44** [Kimball, Dan] [Lewis, Mark])

Response: The potential impacts of building and operating the proposed units on nearby parks, the CERP, and the Everglades Mitigation Bank will be discussed in Chapters 4 and 5 of the EIS, respectively. The cumulative impacts of the proposed action when added to the impacts of other past, present, and reasonably foreseeable actions including those identified in this comment will be presented in Chapter 7. The EIS will include citations for documents used in its preparation.

Comment: In addition the proposed rock mining project, which is planned within the Biscayne Bay Coastal Wetlands footprint, violates Miami-Dade County's comprehensive development master plan and interferes with the planned restoration project and could worsen saltwater intrusion and chloride contamination in Biscayne aquifer which is, of course, South Florida's primary drinking water supply. (0001-7-6 [MacLaren, Kaitlin])

Comment: No data provided to assess groundwater Impact as a result of the fill extraction and construction of the water management feature. (**0023-3-11** [LaFerrier, Marc])

Comment: No mitigation plan found for possible salt front advancement as a result of rock pit mining. Planned fill source lies approximately 4 miles to the northeast of MDWASD Newton Wellfield. (0023-3-12 [LaFerrier, Marc])

Comment: The application does not contain sufficient water quality and geotechnical information needed in order to evaluate the proposed FPL fill source. Given that the salt front exists at the proposed rockmining site, FPL must provide data including modeling under normal and drought conditions. (0023-3-15 [LaFerrier, Marc])

Comment: The application does not provide sufficient information to determine that the proposed excavation will not extend into groundwater containing 250 mg/L or greater chloride. (**0023-3-17** [LaFerrier, Marc])

Comment: Application does not provide the following data/information related to the FPL-filed CDMP amendment application for rock mining in Agriculturally designated land: 1. Plan and data for the design of the leave-behind water management project, including technologies to be used during and after excavation to ensure that the project's waters are isolated from any present or future salt intruded groundwater. (**0023-3-3** [LaFerrier, Marc])

Comment: Sufficient water quality data for the site not provided. (0023-3-7 [LaFerrier, Marc])

Comment: No studies provided to assess project's impact to surrounding agricultural wells or public wellfields under worst case conditions. (**0023-3-8** [LaFerrier, Marc])

Comment: The COLA proposes the excavation of fill material for the construction of the Units 6&7 Plant from a nearby FPL owned site behind the Homestead Air Force Base (HAFB) and adjacent to Biscayne National Park, although the FPL fill-source is no longer part of the State of Florida SCA. FPL intends to excavate a large amount of rock fill (approximately 300 acres) to elevate the proposed reactor construction site from approximately 1 foot above mean sea level to 26.5 feet above mean sea level. These activities will result in a large man-made lake, as a by-product of rock mining operations. The presence of this new lake would conflict with CERP design features planned for the Biscayne Bay Coastal Wetlands project because the lake would inhibit groundwater flow to the southeast and possibly exacerbate salt water intrusion inland. (**0025-2-16** [Kimball, Dan] [Lewis, Mark])

Response: Available information about the fill source will be provided in Chapter 3 of the EIS. The impacts of obtaining fill material will be presented in Chapter 4; and the cumulative impacts of the proposed action by FPL to build and operate proposed Turkey Point Units 6 and 7, along with other past, present, and reasonably foreseeable future actions by other agencies, will be presented in Chapter 7, including the impacts associated with the CERP.

Comment: Location and design approval from the Homestead Air Reserve Base for the project's conformance with AICUZ recommendations regarding bird strikes and other potential navigational hazards has not been provided. (**0023-3-10** [LaFerrier, Marc])

Response: This comment refers to the SCA submitted to the State of Florida by FPL, but it indicates an interest in FPL's proposed plant design. A description of the site layout, the reactor type, and the cooling-water systems will be described in Chapter 3 of the EIS.

Comment: The applicant shall also address how road construction and operation would compromise the ability of the EEL Program and other agencies to appropriately manage public lands. (0023-1-51 [LaFerrier, Marc])

Comment: Please provide amended maps showing EEL projects, along with a complete analysis of the effects of linear feature construction and operation on nearby EEL Projects. (**0023-3-21** [LaFerrier, Marc])

Comment: Environmentally Endangered Lands (EEL) owned and/or managed preserves exist along proposed corridors. Please provide an analysis of the potential impacts to EEL Preserves from any work related to the transmission lines, including but not limited to development of corridors, acquisition to corridors, acquisition of additional easements, etc. (0023-3-28 [LaFerrier, Marc])

Comment: Maps in the site certification application fail to depict conservation lands held and/or managed by the Environmentally Endangered Lands (EEL) Program. For example, the maps depicting jurisdictions fail to include MDC EEL holdings. Direct, indirect and cumulative impacts to these lands associated with any of the proposed work or changes in hydrology is not addressed and needs to be detailed. (0023-3-45 [LaFerrier, Marc])

Comment: Permitted land use within EEL acquisition project areas must be compatible with the environment and objectives of the Comprehensive Everglades Restoration Plan (CERP) and shall not adversely affect the long-term viability, form or function of these ecosystems. Any land use or site alteration should be carefully evaluated on a case by case basis by federal, state, regional and county agencies for conformity with all prevailing environmental regulations and compatibility with the objectives of CERP. Land Use Element LU-3B states that all significant natural resources and systems shall be protected from incompatible land use. Conservation Objective CON-4 and Policy CON-4A of the CDMP recognize the importance of these wetlands for their aguifer recharge and storage capacity and states these values shall be maintained, enhanced or restored. Objective CON-7 and related policies state that Miami-Dade County shall protect and preserve the biologic and hydrologic functions of the Future Wetlands identified in the Land Use Element. (The Future Wetlands includes all of the South Dade Wetlands area). Some of the proposed features are within Environmental Protection Sub Areas E and F of the CDMP which both require that the approval of any use and access roads or easements should be conditioned on demonstrated consistency of that use with the adopted goals, objective and policies of the CDMP and conformity with all prevailing environmental regulations. (0023-3-46 [LaFerrier, Marc])

Response: These comments refer to the SCA submitted to the State of Florida by FPL but they indicate an interest in how activities associated with building and operating proposed Turkey Point Units 6 and 7 would affect efforts being taken under the Environmentally Endangered Lands (EEL) Program. The EIS will address the cumulative impacts from the combination of the proposed action and past, present, and reasonably foreseeable actions, regardless of who takes the actions. The cumulative impacts associated with building and operating the proposed units will be evaluated for each affected resource.

Comment: The SFWMD recommends that the following issues be addressed in the Environmental Impact Statement: Temporary Roadway Improvements for Construction of Units 6 & 7 – The potential for adverse impacts to the CERP Biscayne Bay Coastal Wetlands Project. (**0032-15** [Golden, James])

Response: The EIS will address the cumulative impacts from the combination of the proposed action and past, present, and reasonably foreseeable actions, regardless of who takes the actions. The cumulative impacts associated with building and operating the proposed units will be evaluated for each affected resource.

21. Comments Concerning Cumulative Impacts

Comment: In addition to the ongoing problems from the existing facility, the combination of losing wetlands and worsening saltwater intrusion could significantly impact the habitats, water quality, surface flow, projected restoration of water levels, and groundwater hydrology functions that are the object of the Everglades restoration. Construction of the plant itself, as well as the operation of the facility, will have adverse impacts on water quality, ecology, and aesthetics of the Biscayne National Park. It will negatively impact the areas' protected species, wetlands, and much-needed fresh groundwater input into Biscayne Bay. (**0001-2-3** [Harris, Walter])

Comment: A final comment is that the -- the current -- the existing, in Units 4 and 5, as the previous speaker mentioned, are impacting our groundwater supply. And it is suspected that they are contributing to saltwater intrusion. And so we would like you to consider the cumulative effects of existing plants and then consider what additional impact a new plant will have. (**0001-7-8** [MacLaren, Kaitlin])

Comment: One of the most important things that the NRC can do as a function of the environmental review of this application is to evaluate the cumulative environmental impacts from all of these plants. After all, the reactors are called 6 and 7, not 1 and 2. Just evaluating this application as if the proposed plants exist in a vacuum, as the State is doing through their permitting process, would be a disservice to the community and to our environment. The NRC needs to evaluate the impacts of the two new reactors. Direct impacts like wetland losses, dredge fill pads, permanent onsite nuclear waste storage and temporary 20-year roads through

an Everglades Restoration Project, in the context of the impact already caused by the existing power plant complex. (**0002-1-2** [Sorenson, Katy])

Comment: The Draft EIS should discuss the cumulative impacts to the environment associated with FPL's past, present, and future expansion in the south Florida region. (**0014-14** [Mueller, Heinz])

Comment: FPL has reportedly received all of the necessary approvals from FDEP to proceed with the uprate project. Construction activities for this project will occur primarily during two scheduled outages per unit, with each outage lasting approximately 50 days. Construction activities for Unit 3 and 4 are anticipated to conclude in the fall of 2011 and 2012, respectively. After completion, the cooling water flow rate will remain unchanged, although the temperature rise across the condensers is anticipated to increase by 2.5F. FPL proposes that Units 6 and 7 will have their cooling water needs provided by cooling towers as opposed to the existing canal system. Make-up for the towers is to be provided by reclaimed water. The Draft EIS should assess the cumulative effects of the uprated Units 3 and 4 combined with construction of new Units 6 and 7. Also, any increased removal of water from area basins as a result of operations of the interceptor ditch pumps should be discussed. (0014-7 [Mueller, Heinz])

Response: Cumulative impacts result from the combined effects of the proposed action and past, present, and reasonably foreseeable actions, regardless of who takes the actions. The appropriate geographic area and time period for considering cumulative impacts depend on the resource being affected and will be determined for each resource as part of the review team's evaluation. The impacts of building and operating proposed Turkey Point Units 6 and 7 on Biscayne Bay and adjacent lands will be added to other known or reasonably foreseeable actions and stressors within the defined geographic area of interest, including known or planned upgrades of other units on the Turkey Point site, if appropriate. The results of the analysis of impacts of the proposed units' operations on water quality, ecology, and aesthetics will be presented in Chapter 5 of the EIS. The results of cumulative impact analyses will be presented in Chapter 7.

Comment: What we are now finding in our communities is that there are significant risks to those of us who still have residents on well water. We have 1,000 homeowners, just in the Village of Pinecrest, still on well water. And we risk, with those residents on well water, the specter of saltwater intrusion at any time and the balance of what may happen as a result of the continued impositions of construction and what the nuclear plants would do, likely due to the balance and the risk that that would place. That all of our homes that are still on well water may be contaminated through saltwater intrusion is a very serious issue that we -- none of us have the financial wherewithal, nor does our county, who is facing a \$400 million deficit, nor does the State of Florida which is facing an additional -- I think it is 3 to \$6 billion deficit in the coming year, have any resources to come in and help put the infrastructure in place for those homes that are on -- continue to be on well water. (**0001-21-3** [Lerner, Cindy])

Comment: Another suggestion would be that they take the cooling water from deep within the bottom of Biscayne Bay and Card Sound, what they call the boulder zone. No one has the foggiest notion what that would do to the surface water. Would it create a cone of water? And if it did, how would that affect the inshore current that existed for thousands of years? (**0001-6-5** [Miller, Lloyd])

Comment: Our first major concern has to do with water impact. FPL proposes to place radial collector wells 40 feet below Biscayne Bay Aquatic Preserve in the upper levels of the Biscayne aquifer. And this step -- we hope you will consider whether this step may be within the take zone of the Biscayne aquifer. (0001-7-1 [MacLaren, Kaitlin])

Comment: The Turkey Point expansion would require either 90 million gallons a day of reclaimed water, 124 million gallons a day from radial wells, or a combination of both. This is a huge amount of water and, as I'm going to discuss later, there are other better uses for this water. (**0001-7-2** [MacLaren, Kaitlin])

Comment: At least 3 percent of the water to be used in the radial collector wells will come from the Biscayne aquifer. This will result in a reduction of more than 3 million gallons a day of groundwater flow needed to support the flora and fauna of Biscayne Bay. (**0001-7-4** [MacLaren, Kaitlin])

Comment: This proposed expansion is in direct conflict with Biscayne Bay Coastal Wetland Project, which is part of the Everglades restoration. The availability of reused water to meet both the projected needs of FPL to operate the new plant and the needs of Everglades restoration is questionable. There was water, reused water earmarked for Biscayne Bay Coastal Wetlands Project that could be used for this project. (0001-7-9 [MacLaren, Kaitlin])

Comment: Some of the other speakers have already talked about water. Nuclear plants consume more water and withdraw more water than coal plants, natural gas plants, and certainly far more so than wind or solar as forms of energy. As other speakers have alluded to, we already have water shortage issues with drinking water. (**0002-16-1** [Shlackman, Mara])

Comment: And we have to consider the socioeconomic impacts of this. The Redlands and Homestead are still an area that have agricultural businesses. There's been an effort to cultivate agritourism with such things as the Schnebly Winery, the Fruit and Spice Park, Paradise Farms. And if we have all of this water being withdrawn for the nuclear plant, these agricultural businesses will suffer that much more. (**0002-16-2** [Shlackman, Mara])

Comment: Miami-Dade County is on permanent water rationing; we are only permitted to water our lawns twice a week. In the winter, winter that can go down to zero. We do not flush our toilets after every use; if it's yellow, let in mellow, if it's brown, flush it down. 3,000,000

people in Miami-Dade County live like this and you are going to build a power plant here that uses 125,000,000 gallons of water per day????!!!!. (0016-14 [White, Barry])

Comment: The drawdown of water will be a threat to our water supply, creating salt water intrusion, increased salinity, and challenge our continued existence on this endangered land not to mention the impact on the nearby national parks, their flora and fauna. (**0016-5** [White, Barry])

Comment: The proposed use of radial wells to draw water from 40 feet under Biscayne Bay is a major threat to the water supply of the area. There is lateral movement of water in the aquifer so that the water will be drawn from all of the surrounding area including the aquifer to the west, the source of the Florida Keys water. (0016-6 [White, Barry])

Comment: We in Florida, where water is already scarce, and rationed many months of the year, cannot afford to give up the additional millions of gallons of water required for these new nuclear plants' operation. The existing plants at Turkey Point have already contaminated our groundwater, like nuclear plants have all over our country, and caused saltwater intrusion into our freshwater wetlands and drinking water sources. Please do not further risk our irreplaceable Florida water resources by allowing these new plants to be built. (**0021-4** [Wilansky, Laura])

Comment: 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. (**0022-1-9** [Reynolds, Laura])

Comment: The operation of the RCWs would result in hydrologic impacts, including ground... water, on Biscayne Bay due to geological disturbances, resulting in water volume and quality alterations... The cone of influence during the operation of the RCWs extends into Biscayne National Park boundaries. Therefore, a large portion of the nearly 124 million gallons of Biscayne Bay water will originate from within Biscayne National Park boundaries, which is a protected water body. (**0025-1-12** [Kimball, Dan] [Lewis, Mark])

Response: The impact of consumptive water use on both the local and regional water resources associated with building and operating proposed Turkey Point Units 6 and 7 will be presented in Chapters 4 and 5 of the EIS. Both current and future conditions, including changes in water demands to serve the needs of the future population and changes in water supply, will be considered. Cumulative impacts will be addressed in Chapter 7; and system design alternatives, including cooling water system designs and alternative cooling water sources will be presented in Chapter 9.

Comment: Turkey Point is situated between two national parks and over the water supply for the entire Florida Keys and much on southern Miami-Dade County; and salt water intrusion and

increased levels of water salinity from the operation of Turkey Point Reactors 3 & 4 are already major concerns in the area. (**0012-6** [Payne, Nkenga])

Comment: [T]he construction of the additional nuclear power plants, as well as the operation of the existing facilities, will have adverse impacts on water quality, ecology, farm lands, cause salt water intrusion, as well as adversely impact the habitat of protected species, wetlands and much needed fresh groundwater input to Biscayne Bay. (**0012-9** [Payne, Nkenga])

Response: The impacts on water quality, including the effects of saltwater intrusion during building and operation of the proposed units will be discussed in Chapters 4 and 5 of the EIS. The impacts of the proposed actions on the local ecology and nearby farm land will also be addressed in Chapters 4 and 5. Saltwater intrusion resulting from the combined effects of the proposed action and past, present, and reasonably foreseeable actions will be addressed in Chapter 7.

Comment: Ensure an analysis of the possible impacts of sea level rise on the proposed project with all of its associated facilities, consistent with the range of potential increases adopted by the Miami-Dade County Climate Change Advisory Task Force. FPL's assessment is based historical information on sea level rise in Miami-Dade County. Current discussions of sea level rise suggest that a much more significant rise could occur during the useful life of the proposed project, initially from 2020 to 2060, with a possible extension of 20 years, taking us out as far as 2080. (**0019-3** [Hamilton, Karen])

Comment: The impacts of sea level rise due to climate change should be addressed as they pertain to the operation and maintenance of the RCWs and the hydrologic modeling, which is being used to forecast the percentage of water derived from Biscayne Bay versus freshwater from the Biscayne Aquifer. The effects of climate change should also address major storm events and cooling canal functionality over the projected lifespan of Units 6&7. Peer reviewed and governmental references should be part of this analysis, including the [PCC Fourth Assessment Report: Climate Change 2007; the Miami-Dade Climate Change report; and the Army Corps of Engineers, engineering circular – sea level rise 1165-2-211. (0025-2-13 [Kimball, Dan] [Lewis, Mark])

Comment: The SFWMD recommends that the following issues be addressed in the Environmental Impact Statement: Hurricanes/Climate Change/Sea Level Rise – The potential for adverse impacts related to the siting and design of the proposed plant and associated facilities directly on the coast in an area subject to the direct effects of hurricane tidal surge, climate change, and sea level rise. (0032-28 [Golden, James])

Comment: The sighting of the proposed Florida Power and Light (FPL) nuclear reactors 6 and 7 adjacent to FPL's existing power plants on the sight abutting Biscayne Bay approximately 25 miles south of the city of Miami, is ill conceived and short sighted. According to the latest United

Nations Intergovernmental Panel on Climate Change (IPCC) estimates, a sea level rise between 18 and 59 cm (7.1 to 23.2 inches) can be expected before the turn of the century. Unfortunately the IPCC did not factor in global land ice melt into this equation. The new IPCC report, due to be released in 2014, will include land ice melt sea level rise forcings. (0034-1 [Kipnis, Daniel])

Comment: This scenario may not be the reality of the situation. Dr. Stefan Rahmstorf, a leading and respected authority on the subject notes that, "land ice (glacial melt) has, in fact, contributed 80 per cent of the observed sea level rise over the past five years", and, "if two-thirds of glacier ice were lost, this would add 40 centimeters to the global sea level", then, "The big ice sheets would then need to contribute only about 50 centimeters (19.7 inches) — corresponding to less than one per cent of their mass — to bring sea level rise up to 114 centimeters (44.9 inches)". This does not include any thermal expansion of ocean water which the IPCC admits will increase due to rising global temperatures. The only debate among climate scientists is not if, but when these changes will occur. Additionally and closer to home, the Science Committee of the Miami Dade County Climate Change Advisory Task Force (CCATF), Co-chaired by Dr. Hal Wanless, Chairman of the University of Miami's Geology Department and Dr. Stephen Leatherman, Director of the International Hurricane Center at Florida International University, have predicted that sea level rise will be between 91.4 cm and 152.4 cm (3 to 5 Feet) by the end of the century and possibly as early as 2070. (**0034-2** [Kipnis, Danie]]

Comment: It should be plain to see, especially when sighting a 23 billion dollar facility with a useful working life of up to 100 years, that the proposed site presents inherent risks that place not only the financial investment of FPL's rate payers but also their safety in extreme jeopardy. A sea level rise of just one foot would inundate 17% of Miami Dade County's land mass, most of which would be in south Dade, including the area around Turkey Point and the access road to the facility. A two foot rise covers 28% of Miami Dade County's land mass. Turkey Point generating facility effectively becomes an island. The current cooling canals for the existing nuclear generating facility become unusable as they are breached by rising bay waters. (0034-3 [Kipnis, Daniel])

Comment: At the full predicted 5 foot range of sea level rise, occurring sometime between 2070 and the turn of the century, only 54% of Miami Dade County remains high and dry. FPL's proposed power lines running down the western side of the County's Urban Development Boundary (UDB) are miles from dry land as that part of the Everglades is flooded with both fresh water, used to hold back the rising sea, and salt water which is fast encroaching. The coastal ridge is now divided by tidal channels into a series of independent islands displacing a million or more county residents. The effect of any hurricane storm surge will force an additional million or more residents to leave the county for higher ground as they have already had to do on the barrier islands of Miami Beach and Key Biscayne. Even as bad as this scenario seems, it will get worse. Sea levels are expected to continue to rise for centuries to come and if they reach

historic levels of past melts, could exceed 20 meters (66.61 feet). This may happen faster than expected due to accelerated climate forcings as countries have not only failed to reduce greenhouse gas emissions, but actually have accelerated them. (**0034-4** [Kipnis, Daniel])

Comment: The bottom line, the Nuclear Regulatory Commission and the Army Corps of Engineers should withhold permitting for FPL's proposed generating facilities 6 and 7 due to concerns that: (1) Predicted sea level rise would first, isolate the facility on an island, then (2) Cause the access road to be undermined and overrun by sea water causing it to become unstable and unusable, then (3) Overrun and alter the current cooling canals and possibly cause the proposed cooling-water radial wells to function differently than now proposed and possibly cease to function as planned, then (4) Increase the effects of storm surges from hurricanes and other tropical events on the facilities and access roads, then (5) Place maintenance constraints on power transmission lines that now will be water bound, then (6) Unfairly burden rate payers in funding a project that will not reach its projected life span, then (7) Have an insufficient client base to support the facilities operations when much of south Florida's population is forced to relocate due to sea level rise, tidal surge events, pollution concerns, altered wet and dry seasons, increased chance of tropical diseases and all the other predicted effects of climate change. (**0034-5** [Kipnis, Daniel])

Response: The impact of sea level rise on the safe operation of the proposed units is considered in the NRC's safety review and is not within the scope of environmental review. Results of the safety review can be found in the Safety Evaluation Report (SER). However, sea level rise will be considered as one of the contributing factors to the cumulative impact of the proposed action and other past, present, and reasonably foreseeable actions in Chapter 7 of the EIS.

Comment: The application proposed the discharges of potentially contaminated industrial waste from the maintenance of boiler, equipment closed cooling water system maintenance, and other areas to cooling canals. Although the use of oil-water separators is mentioned, no information was provided to allow for evaluation of potential impacts to sensitive ecological receptors, and surface and groundwater quality. No information was provided to show that no contamination will result from such discharges. (**0023-1-10** [LaFerrier, Marc])

Response: This comment refers to the SCA submitted to the State of Florida by FPL, but it indicates an interest in the potential impacts of the proposed plant on Federally and State-listed endangered or threatened species and surface water and groundwater quality. The potential impacts of building and operating proposed Turkey Point Units 6 and 7 on Federally and State-listed endangered or threatened species and surface water and groundwater quality will be discussed in Chapters 4 and 5 of the EIS, based on the affected environment described in Chapter 2. The cumulative impacts of the proposed action and other past, present, and reasonably foreseeable future actions will be assessed in Chapter 7.

Comment: The Summary of Measures and Controls to limit Adverse Impacts during Construction (Table 4.6-1, COL, Environmental Report, Part 3, Ch. 4) assesses the cumulative impacts to land use, hydrology, water use, subsurface flow, ecology, and socioeconomics, as a result of the construction of the entire Unit 6&7 plant (pre and post construction). FPL lists most impacts as small in this analysis, compared to moderate or large. Small is defined by FPL as Environmental effects are not detectable or are so minor that they will neither destabilize nor noticeably alter any important attribute or resource. A striking aspect of this analysis is the incorporation of CERP features as either a contributable negative or positive impact to Units 6&7 construction. FPL appears to use benefits from the proposed Biscayne Bay Coastal Wetlands/CERP project to mitigate the environmental impacts of the Units 6&7 construction. This appears highly inappropriate in the determination of total impacts from the FPL project. Therefore, the NPS requests that this analysis be carefully evaluated to consider the impacts Unit 6&7 combined construction will have on Biscayne Bay Coastal Wetlands/CERP implementation, as well as, all other associated impacts to the environment. (**0025-1-15** [Kimball, Dan] [Lewis, Mark])

Response: Cumulative impacts result from the combined effects of the proposed action and past, present, and reasonably foreseeable actions, regardless of who takes the actions. The results of cumulative impact analyses will be presented in Chapter 7 of the EIS; and in that analysis the contribution of proposed Turkey Point Units 6 and 7 to the cumulative impact will be identified. In addition, the respective impacts of building and operating the proposed units will be presented in Chapters 4 and 5.

Comment: 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. (0022-2-17 [Reynolds, Laura])

Response: The potential impacts of the airborne emissions from building and operating proposed Turkey Point Units 6 and 7 will be discussed in EIS Chapters 4 and 5, respectively. The potential cumulative impacts of the proposed nuclear power generation on climate change will be addressed in Chapter 7.

Comment: 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. (**0022-4-17** [Reynolds, Laura])

Response: The potential impacts of building and operating proposed Turkey Point Units 6 and 7 on climate change will be discussed in Chapters 4, 5, and 7 of the EIS, based on the affected environment described in Chapter 2. The EIS will include citations for documents used in its preparation.

Comment: 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. (0015-5 [Espinosa, Carlos])

Response: The cumulative impacts associated with building and operating proposed Turkey Point Units 6 and 7 will be evaluated for each affected resource. Past, present, and reasonably foreseeable actions taken under the CERP will be considered in the cumulative impact analyses presented in Chapter 7 of the EIS.

22. Comments Concerning the Need for Power

Comment: Like the previous speakers of the Greater Miami Chamber, the Mayor of the Florida City, Mr. Bill Diggs, efficient supply of power is essential to sustain economic growth and sustainability in South Florida. Business and industries is what we are predominantly, as an economic development council, concerned with. People that come to our community need to know that there is power provided by Florida Power and Light that is second to none, along with the infrastructure of roads, education, and other things that are climbing at an enormous rate in our community. Just the expansion of roads alone in the last two years is astronomical. Why? Because there's a need. There's a lot of people coming into our communities. We need to keep up with that capacity, and that's what this is all about. As well, Barry Johnson, with the Greater Miami Chamber, talked about the fact that we've been accustomed to a quality of life, which is true. That quality dictates the need for additional infrastructure and utilities, power, all those things that we depend on in our daily lives. (0001-25-2 [Horton, Richard])

Comment: The addition of the two new reactors to Turkey Point provide the energy which we will need in South Florida as our community continues to grow; 5, 6, 7 million people projected in the not too distant future. We've got to provide the kind of services that everyone expects and demands (**0001-5-2** [Johnson, Barry])

Comment: According to the Waxman-Markey Bill, we would probably need about 45 new nuclear reactors to meet the expectation, and I think 6 and 7 is the start of that. (**0001-9-3** [Martinelli, Tom])

Comment: I believe our electrical energy use is going to continue to grow in South Florida. I was walking the Hollywood Broadwalk this morning, and there were two large cranes I saw right at Sheridan Street and A1A. And what I found out they were doing is they were installing a new cellular tower on the top of the condominium building for wireless 4G/3G for the new smartphones. And we're more and more, as consumers, using electric. And to be competitive in this world we're not going to cut back on our electric use. However, there were some good

points that were brought up, and it kind of ties into what I think is very important. (0002-17-2 [Eney, Douglas])

Comment: If you look across the country, a lot of your nuclear power plants have reached the end of their life expectancy. Over the last, say, 10 years, America has been rebuilding, revamping them, making them capable of going on another 20, 30 years. You have a lot of coal fired power plants that have reached their life expectancy. As far as America as an industrial nation, we need this power to power our factories. Look at it. You go throughout the United States -- when you go to stores you don't see hardly anything made in America anymore. So if you look at it from an economic standpoint, if you see that these power plants have reached the end of their life expectancies, big industry is looking at this. (0002-7-2 [Snelson, Richard])

Response: These comments express agreement with the FPL application's assertion that the area needs additional power. The need-for-power analysis will be addressed in Chapter 8 of the EIS.

Comment: FPL and Florida should be the leader in renewable and nuclear energy. So much that supply is greater than demand and we can sell it to other states. (**0006-5** [Weins, Brian])

Comment: 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. (**0022-3-6** [Reynolds, Laura])

Response: The need-for-power evaluation will be presented in Chapter 8 of the EIS.

Comment: If you Google FP&L, PSC -- Public Services Commission -- you'll find a lot of data, you'll find a lot of interesting articles. And I would direct you primarily to a writer for the <u>Sun</u> <u>Sentinel</u> in Fort Lauderdale called Julie Patel, for whom FP&L is her beat. And look at the long history of the relationship between PSC and FP&L. Why do I mention PSC at the beginning? Because they're the ones who did the needs analysis. Remember, this project starts with a needs analysis, where the PSC determined that there was a need for this power plant. Is there a need for this power plant? (0002-14-1 [Schwartz, Matthew])

Response: The need-for-power evaluation will be presented in Chapter 8 of the EIS. The determination of the need for power within a given area is not under the NRC's regulatory purview. However, for the purpose of its NEPA analysis, where another regulatory body has made a need-for-power determination, the NRC staff reviews the applicable regulator's need-for-power analysis to determine if it is (1) systematic, (2) comprehensive, (3) subject to confirmation, and (4) responsive to forecasting uncertainty. If the need-for-power evaluation is found to be acceptable under these criteria, no additional independent review by the NRC is needed.

Comment: Is the Florida population growing? Are we getting to the -- what was it, 15 million people we're going to have living in South Florida? Nowhere near there. In fact, population is not growing, it's static. There's a reason for that, there's a reason why the population isn't growing. But at any rate, this project does not take that into consideration. (**0002-14-2** [Schwartz, Matthew])

Comment: I'd first like to say that I know that we're saying there's a new need for energy. The last I've heard there's been a population decrease in this area. (**0002-8-1** [O'Katy, Jessica])

Comment: 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. (**0022-3-4** [Reynolds, Laura])

Response: The need for power in light of population growth and electrical demand in the FPL service area will be analyzed and addressed in Chapter 8 of the EIS.

Comment: The alternative analysis is based on an archaic assumption that base load power is needed. Last April, Federal Energy Regulatory Commission Chief Jon Wellington told the U.S. Energy Association that saying we need base load energy is like saying we need mainframe computers. The technology currently exists for distributed energy systems that negate the need for base load power. Further, the NRC must use updated information to reevaluate FPL's 2008 analysis for the new reactors in terms of the need for power given -- for the need for power, given the economic downturn and significant reduction in demand. (0001-14-5 [Hancock, Mandy])

Comment: The electricity generated is not even needed in South Florida where the plants are proposed to be built, endangering all of us in this area for something we will neither use nor need. And the electricity these proposed plants could generate is not needed, period – this amount of energy and more could easily be saved by simply increasing conservation and efficiency, at a saving of billions of dollars to consumers, with NO risk to the environment whatsoever. (**0021-3** [Wilansky, Laura])

Response: Decisions regarding which generation sources and alternatives to deploy are made by the applicant and regulatory bodies such as the public utility commission. The impacts of energy efficiency and demand-side management on the need for power and load forecasts will be addressed in Chapter 8 of the EIS. Alternative actions such as the no-action alternative, new generation alternatives, purchased electrical power, energy efficiency, alternative technologies (including renewable energy such as wind and solar), and the combination of alternatives will be considered in Chapter 9. The determination for the need for power is not under NRC's regulatory purview. However, for the purpose of its NEPA analysis, where another regulatory body has made a need-for-power determination, the NRC staff will review the applicable regulator's need for power and determine if it is (1) systematic, (2) comprehensive, (3) subject to confirmation, and (4) responsive to forecasting uncertainty. If the need-for-power evaluation is found to be acceptable under these criteria, no additional independent NRC review is needed. **Comment:** 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. (0022-1-5 [Reynolds, Laura])

Comment: 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. (0022-3-5 [Reynolds, Laura])

Comment: 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. (**0022-4-24** [Reynolds, Laura])

Response: The determination for the need for power within a given area is not under the NRC's regulatory purview. However, for the purpose of its NEPA analysis, where another regulatory body has made a need-for-power determination, the NRC staff reviews the applicable regulator's need-for-power analysis to determine if it is (1) systematic, (2) comprehensive, (3) subject to confirmation, and (4) responsive to forecasting uncertainty. If the need-for-power evaluation is found to be acceptable under these criteria, no additional independent review by the NRC is needed. The need-for-power discussion will be included in Chapter 8 of the EIS. Chapter 8 will include a discussion of planned retirements of other generating facilities within the FPL service territory. The potential cumulative impacts associated with sea level rise will be discussed in Chapter 7.

23. Comments Concerning Alternatives – Energy

Comment: It is not okay to build a nuclear power plant. If Germany can take and stop with all their nuclear power plants, planned by the year 2020 because they have found solar to be that efficient, and they get 50 percent less sunlight per year than we do, then certainly we can come up and do the same thing. (**0001-11-11** [Amor, Valerie])

Comment: This is the Sunshine State. We should be using sunshine as our source of energy. This is almost Neanderthal that we're still considering building more nuclear power as a way to solve our energy crisis. We have not gone beyond this point and it's very disappointing. There have been studies done by Broward County, a targeted industry study that said, solar is to be the next industry. (0001-11-7 [Amor, Valerie])

Comment: There are more affordable ways for FPL to meet energy demand while protecting the environment and tackling global warming. As SACE and the NRDC testified to the PSC in 2009, simply increasing energy efficiency goals by 1 percent could save enough energy to
estimate the need -- to eliminate the need for new reactors, while saving ratepayers money. Additionally, investing more resources in solar and clean bio-energy, instead of costly new reactors, would benefit FPL and offer economic development opportunities for Florida, without draining our water resources or pocketbooks. The NRC must evaluate updated information using a combination of these sustainable energy choices, including energy efficiency, before allowing FP&L to commit billions of dollars, billions of gallons of water, and nearly an entire decade to building these reactors when that time and money could be better spent on less risky options. (0001-14-3 [Hancock, Mandy])

Comment: Energy efficiency measures preserve our water resources, save customers money, and also pose no health or safety risks to the public. Florida utilities have significant resources to tap in these areas as outlined in a recent extensive report, Energy Efficiency in the South, by Georgia Tech and Duke University, and our report, Yes We Can: Southern Solutions for a National Renewable Standard. Renewable energy technologies, such as solar and wind, do not require extreme manipulation of our precious water resources. The environmental report overlooks the potential for FPL to pursue a combination of wind and solar resources within its service territory and states there is no renewable technology alternative that could mitigate the need for nuclear power (**0001-14-4** [Hancock, Mandy])

Comment: It's imperative that the U.S. invest in a safe, sustainable energy paradigm for the 21st Century that can also help revitalize our economy and create vastly more jobs than Turkey Point could ever dream of. The nuclear industry claims that it is a necessary piece of that energy future. On the contrary, studies indicate that the energy mix will not require a nuclear component. In the ten years it takes to bring a new plant online, we could've been developing a new truly Green energy technologies. Because the nuke industry cannot compete on its own without massive government subsidies, it threatens our bright Green future by drawing public investment away from it. (0001-16-8 [Showen, Steve])

Comment: As Florida Power and Light staff was helping us build this house and advising us, my wife and I would say: Why are they helping you not pay them so much money? It doesn't quite make sense. So we asked them one time and the gentleman I asked said, Albert, you don't understand. If everyone built like this we would never need to build another nuclear power plant. (**0001-24-4** [Harum-Alvarez, Albert])

Comment: I know it isn't the Nuclear Regulatory Commission's place to determine need, but I do believe that there is a deep reservoir of available energy if we would only embrace energy efficiency. A recent report by Duke University and Georgia Tech concluded that the southern states could meet our future energy demand through aggressive energy conservation programs. There are a lot more jobs to be had putting people to work now, not 5, 10, or 15 years from now retrofitting homes and business throughout our community, and we don't have to pay for these jobs and reduced energy bills through an early cost recovery fee. (**0002-1-4** [Sorenson, Katy])

Comment: This project, from what I can see, it's about a \$20 billion project. What's the problem with that? Because we are in an era where renewable, true renewable resources are now available to us; ocean power, solar, wind. Insolation is the measurement of how much sun reaches a given area of the earth. Florida is the Sunshine State for a reason. Look at insolation maps of the United States. South Florida is equivalent to parts of the Southwest; Arizona, New Mexico. We have the energy here, we are not using any of it. We are not making use of the solar. (**0002-14-3** [Schwartz, Matthew])

Comment: I think we keep looking at fossil fuel and I don't think we really understand how dependent we are on it and what a nasty thing it can be. And, yes, it would be wonderful and -- really wonderful. I don't think it's pie in the sky. I don't think that solar power is a magical thing. I think it's a coming thing, and I do think FP&L uses. I know they do. They use wind power. (0002-15-4 [Finlan, Mary])

Comment: But solar installations on rooftops would create green jobs that would provide a viable alternative for the community. (**0002-16-4** [Shlackman, Mara])

Comment: Looking at reports that have been done in the name of efficiency, and we've heard a lot of about efficiency and renewables, there were a couple -- the Southern Alliance for Clean Energy and the Natural Resource Defense Council both testified to the Public Service Commission last year that simply increasing energy efficiency goals by 1 percent could negate the need for any nuclear power reactors. I think the NRC should really look at this option while they're doing the consideration of the scoping process. Obviously, renewables in conjunction with that would even further negate the need for new nuclear reactors. The NRC must evaluate updated information using a combination of this sustainable energy choices, including energy efficiency, before allowing FP&L to commit billions of dollars, billions of gallons of water, and nearly an entire decade to building these reactors when that time and money could be better spent on less risky options. (**0002-18-3** [Hancock, Mandy])

Comment: I, instead, would like to propose that we focus on truly renewable energy and clean energy answers as well as efficiency in Miami. (**0002-8-3** [O'Katy, Jessica])

Comment: So, I'd like to ask that we focus on truly clean and renewable energy sources like solar or wind, and most of all efficiency, and definitely take into consideration all of the environmental impacts that we can when making this decision. (**0002-8-9** [O'Katy, Jessica])

Comment: FPL should be exploring wind farms off the coast of Florida not oil drilling. Every new structure built should be required to use a minimum of 25% solar energy. (**0006-4** [Weins, Brian])

Comment: Opting to pursue energy resources that would not involve such irreversible damage to the surrounding environment is necessary to ensure the safety of the surrounding community.

Renewable energy resources such as wind and solar power are a much wiser alternative for the State of Florida. (0007-7 [Burris, Jessica])

Comment: Solar power is growing and Florida is known as the sunshine state. If we charged each homeowner for the installation and maintenance of the solar panels on their homes, then we could probably power the whole state. Also solar power does not emit green house gases or any other harmful side effects either. (**0009-2** [Hogsed, Daniel])

Comment: If we installed solar panels on every home in Florida we could generate more jobs than the nuclear power plant expansion would and inspire other countries to follow our lead. (**0009-4** [Hogsed, Daniel])

Comment: The City of South Miami supports energy policies based on investment in the rapid development of solar and wind energy, and all other proven renewable energy solutions, combined with a comprehensive program promoting energy efficiency and conservation. (**0012-18** [Payne, Nkenga])

Comment: South Miami supports energy policies based on investment in the rapid development of solar and wind energy, and all other proven renewable energy solutions, combined with a comprehensive program promoting energy efficiency and conservation. (**0012-2** [Payne, Nkenga])

Comment: The Draft EIS should discuss other alternative sources of energy that may available to serve the project purpose that would have less impact on sensitive wetland resources. (0014-16 [Mueller, Heinz])

Comment: We can do better through major investments in energy efficiency, conservation, and renewables. No health risks involved if a solar panel breaks. (**0017-3** [Troner, Susannah])

Comment: I am fairly certain that FPL has done less than any other utility to try to curb electrical usage in our community through demand side management. They have no true incentive to do so. (0017-5 [Troner, Susannah])

Comment: With so many truly clean, safe, renewable and sustainable technologies now available and in development, there is no reason to build new nuclear plants, which will only drain much-needed resources from full development of better, safer technologies. Florida in particular has abundant solar energy that is not being used. (**0021-12** [Wilansky, Laura])

Comment: Please STOP THIS DISASTEROUS AND GREEDY EXPANSION OF ELECTRIC COMPANIES AND OTHER BIG BUSINESSES SET ON 21ST CENTURY ABUSE OF OUR PLANET. Our government must not turn its back – and should immediately go in the green direction – so that Americans, and especially our children, can look back with pride on the

governmental leaders with this kind of foresight that protected the earth for future generations instead of allowing greed to continue its destructive pattern. (**0028-6** [DiNuzzo, Laura])

Comment: What about solar and wind power as safe alternatives? (0031-6 [De Villiers, Elena])

Response: The EIS will be prepared in accordance with 10 CFR 51.75(c). Alternative energy sources, including energy conservation and renewable energy sources, will be considered in Chapter 9 of the EIS.

Comment: I could say the same thing that's been said for this nuclear power plant: I can bring you 4,000 new jobs and I can build a solar power plant. Would you all still be so happy? And I hope you would because if there is a problem with a solar plant, millions of people will not die; or the water will not be contaminated; the air will not be jeopardized; we would not worry about our aquifers. (0001-11-8 [Amor, Valerie])

Comment: Now, aside from saddling the taxpayers with extraordinary risks, the nuclear power will crowd out dramatically energy-efficient competition from decentralized co-generation such as the 21 megawatt plant that provides the entire campus at Massachusetts Institute of Technology with electricity, heating, and cooling by extracting twice as much useful energy and using half as much fuel as a conventional power plant. (**0001-13-8** [Smilan, Stan])

Comment: In light of the recent Gulf oil spill, which upsets me very much, do you think it's a good idea of taking more risks with new technologies? I don't and that's why I'm here today. Why risk so much when there is other, better technologies such as solar? Energy efficiency and clean renewable energy should be our main focus right now. It will save money in the long term so that future generations have a chance. (0001-19-4 [Ryan, Megan])

Response: The evaluation of potential health impacts of operating additional nuclear plants on the Turkey Point site will presented in Chapter 5 of the EIS. In addition, the applicant's safety assessment for the proposed licensing action was provided as part of the application. The NRC is in the process of developing an SER that analyzes all aspects of construction and operational safety. The NRC will only issue a license if it can conclude that there is reasonable assurance that (1) the activities authorized by the license can be conducted without endangering public health and safety, and (2) such activities will be conducted in compliance with the rules and regulations of the NRC. In addition, energy efficiency and renewable energy alternatives to the proposed action will be evaluated in Chapter 9 of the EIS.

Comment: When comparing energy types -- when comparing types of energy generation, nuclear power has higher rates of both water withdrawal and consumption than coal and natural gas and far more than renewable energy sources, such as wind and solar. The 2010 report I mentioned earlier by Georgia Tech and Duke University examined the energy efficiency in the South and it illustrated ways to substantially reduce energy needs, while simultaneously

reducing water consumption. According to the report: In the North American Electric Reliability Council regions in the South, 8.6 billion gallons of freshwater could be conserved in 2020, which is 56 percent of the projected growth in cooling needs. And in 2030 this could grow to 20.1 billion gallons of conserved water, which is 45 percent of projected growth. Instead, we see FP&L projected figures for water demand in 2025 to include a 35 percent increase for public and commercial needs and a whopping 3,224 percent increase for thermoelectric power generation. The NRC needs to fully evaluate less water- intensive energy alternatives -- efficiency and renewables -- including using a combination of these energy sources. The NRC also needs to analyze the impacts such a drastic increase in water demand from the power sector could cause to this area. (0001-14-7 [Hancock, Mandy])

Comment: As a mayor who has signed on the U.S. Conference of Mayors Climate Protection Agreement, I am committed to, as we all are -- we have major sustainable and clean energy initiatives that we are going forward with. But we don't see the cost benefit analysis that you are to do as one that could in any way sustain or support an additional nuclear power infrastructure being placed. We would love to see, as other speakers have said, additional solar manufacturing. We've got the land throughout South Florida to do the manufacturing of the solar panels, to see Florida Power and Light do what they've done in Arcadia, and put in more solar fields. But the adverse impact of the potential for bringing in additional nuclear power plants would interfere with residential, and commercial, and environmental interest to a significant degree. (0001-21-5 [Lerner, Cindy])

Comment: Wouldn't any energy technology create jobs? Developing solar and wind energy systems would involve construction and permanent jobs. FP&L's job creation theme is an emotional ploy at best. Is enticement of jobs in trying economic times a good enough reason for expansion? We need direction from something much smarter and more thoughtful. That takes us to "greener" than coal fired plants. (0029-2 [Guendelsberger, Debra])

Response: Alternative energy sources, including coal, natural gas, energy conservation, and renewable-energy sources, will be considered in Chapter 9 of the EIS. The impact of consumptive water losses on the sustainability of both the local and regional water resources will be presented in Chapters 4, 5, and 7 for building and operation, respectively.

Comment: I ask you to include the true costs of nuclear plants throughout their entire life cycle in your environmental calculations, including the diversion of resources from the desperately-needed development of truly safe and sustainable energy technologies. (**0021-20** [Wilansky, Laura])

Response: The assumptions of reactor life span and costs used in this analysis will be provided in Section 10 of the EIS. Costs for all phases of reactor building and maintenance will be discussed. The license period for a combined license is 40 years. A licensee can request renewal for an additional 20 years. The benefit-cost analysis is done for the license period of 40

years. It would not be appropriate to assume additional cost or benefit for an additional 20 years of license renewal when that action has not been requested or approved.

Comment: As was said, we're referring to Units 6 and 7, because there are five operating units at the site. There are three fossil units and there's two nuclear units. So FPL has a well balance of fuel diversity but it's important that we increase, from a diversity standpoint, our reliance on nuclear energy and renewables. FPL currently is the largest generator of electricity from wind in the United States, and we have the largest solar power facility in the country. We're the third largest generator of electricity from nuclear in the United States currently today, without the addition of Units 6 and 7. (0001-3-3 [Kiley, Mike])

Response: This comment expresses support for the applicant's COL application. It does not provide specific information relating to the environmental effects of the proposed action and will not be evaluated in the EIS. It is listed to compile a complete record of comments received.

Comment: [T]he estimated cost of thirty billion dollars or more which the public is expected to prepay, would be much better spent on creating and/or subsidizing an alternative energy industry. This industry will create many thousands of permanent jobs, as opposed to the relatively few which would be created by establishing new nuclear power plants. (0012-15 [Payne, Nkenga])

Comment: The article [in the "Free Press"] mentioned that the nuclear plants rely almost 50% on natural gas – my question to you, Mayor, is why not go in the more green direction of natural gas for all future energy needs -which is abundant and cheap – I believe we are not even considering other alternatives because of the following: Big Business, FPL, and its well-trodden path of making the American people more and more electricity-, dependent (prices never going down or stabilizing to benefit the American people, even though FPL grows bigger and bigger every year) – and then – influencing our government by threatening loss of jobs = two ways coercing the American people/government into "feeding" this greedy monster AND IS NOT THE WAY TO GO IN THE 21ST CENTURY. (**0028-3** [DiNuzzo, Laura])

Comment: Regarding the coercing of the American people and our government by suggesting that thousands of jobs would be lost if the nuclear plants were not constructed, I propose the following green outlook: If, for instance, your office, Mayor, turned its back on FPL and our government refused to allow this typical example of Big Business 20th Century greed and inconsideration for the American people, and decided that America needs to be more self-sufficient and its individual homes more self-efficient – I can promise you with millions of homes proceeding in this Green Direction, thousands if no millions of jobs would be created by: Independent American-home generators, Independent American-home solar panels, Independent American-home, cistern-like water supplies. Thereby creating endless jobs in manufacturing, sales, installations, maintenances, repairs, and so many other job-related ramifications therewith – making Americans more dependent upon each other rather than big

business and the world for our needs, and more importantly, moving in the right green direction to protect this planet from any further exploitation by big business. As far as fossil fuels are concerned: It is not the fossil fuels that have caused so many problems, it is Big Business Greed that has gotten out of control and must be stopped in the 21st Century. (**0028-4** [DiNuzzo, Laura])

Response: The NRC does not establish public policy regarding electric power supply alternatives nor does it promote the use of nuclear power as a preferred energy alternative. Decisions regarding which generation sources and alternatives to generation to deploy are made by the applicant through least-cost planning and integrated resource plans. Additional regulatory purview is provided by bodies such as State energy planning agencies and commissions. However, the discussion of various alternatives to the proposed project is pertinent to the extent that an energy alternative must reasonably be expected to replace the base load energy supplied by the proposed project, whether individually or in combination. The alternatives must be technically viable, feasible, and competitive. Chapter 9 of the EIS will include the no-action alternative (energy efficiency and demand-side management), new generation alternatives, purchased electrical power, alternative energy technologies (including renewable energy such as wind and solar), and the combination of alternatives. For acceptable alternatives, the potential for environmental and economic impacts will be assessed against the proposed project. If one of the potentially viable alternatives is environmentally preferable to the proposed action, economic impacts will also be compared.

Comment: YOU HAVE THE OPTIONS OF DECIDING TO PUT TP 6&7 SOMEWHERE ELSE AND/OR TO SUGGEST THE USE OF ALTERNATIVE (AND DECENTRALIZED) ENERGY SOURCES AND PRODUCTION. FOR THE SAKE OF OUR GRANDCHILDREN, CHOOSE ONE OF THOSE OPTIONS. (0016-12 [White, Barry])

Response: The NRC staff carefully reviews each application it receives by using an acceptance review process to ensure all required components are provided by the applicant. Each application then receives additional scrutiny during the safety and environmental review processes. Examining alternative energy sources and alternative sites is a function of the environmental review process and these topics will be discussed in Chapter 9 of the EIS.

24. Comments Concerning Alternatives – System Design

Comment: Application fails to provide an alternative analysis for routing of the proposed reuse pipeline. Please provide an alternatives analysis that considers and compares the benefits and impacts of all feasible alternative routes for this pipeline, including but not limited to wetland impacts, impacts to state and federally protected species, impacts to existing water

management features. Alternatives evaluated should include but not be limited to options that minimize wetland impacts. (0023-1-25 [LaFerrier, Marc])

Comment: Application fails to provide an alternatives analysis for the proposed access road network, both for construction access to the plant and access to the transmission line corridors, and to adequately demonstrate that impacts to resources are minimized and avoided. Please provide an analysis of alternatives for the access roads that considers and compares the benefits and impacts of all feasible alternative routes for ingress-egress, and demonstrates minimization and avoidance of impacts including but not limited to wetlands, impacts to state and federally protected species, impacts to existing water management features, impacts to Environmentally Endangered Lands projects, Natural Forest Communities, and tree resources protected by Chapter 24, Miami-Dade Code. Alternatives evaluated for ingress-egress to Turkey Point should include but not be limited to utilization of the existing Palm Drive (SW 344 Street) corridor with and without shift change modifications, and alternative construction entrances including but not limited to utilizing the existing plant entrance with shift change modifications or making improvements to the L-31 E borrow canal. (**0023-2-7** [LaFerrier, Marc])

Comment: Should the NPS decided to acquire FPL's property within ENP and not exchange lands, it is assumed that FPL would not abandon its objective to obtain a western route from Turkey Point to the Levee substation. FPL would, therefore, likely resume investigation of alternate route(s). These new route(s) could affect the local socioeconomic environment including people, property values, employment, and construction-related expenditures in Miami-Dade County. These impacts should be evaluated in the EIS. (**0025-3-47** [Kimball, Dan] [Lewis, Mark])

Response:

The potential impacts of building and operating proposed Turkey Point Units 6 and 7 and ancillary facilities and corridors on wetlands, Federally and State-listed species, and other terrestrially important resources will be discussed in Chapters 4 and 5 of the EIS, based on the affected environment described in Chapter 2. However, alternatives to the roads, pipelines, and transmission corridors proposed by FPL will not be considered in the NRC staff's analysis in the EIS because they are not alternatives to the proposed action (issuance of combined licenses) before the NRC. However, the Corps of Engineers, and perhaps the National Park Service, will be cooperating with the NRC on the EIS. To the extent that a cooperating agency addresses such alternatives for its NEPA analysis, those alternatives would likely be included in this EIS in order to support the cooperating agency's environmental review.

Comment: Given the value of utilizing the treated reclaimed water as a part of the cooling process, it seems beneficial to store or reroute this by-passed water for beneficial use rather

than disposal. Where possible, recycling/reuse efforts should be utilized to maximize the use of the reclaimed waters to supplement operations that have traditionally utilized other surface water or groundwater as sources for cooling and/or for environmental enhancement. (0023-3-48 [LaFerrier, Marc])

Comment: Hence, underground injection is not a proven, reliable method of wastewater disposal in southern Miami-Dade County, most likely due to differences in regional geology. Therefore, FPL should investigate alternative methods of cooling water blowdown and wastewater disposal. What is FPL's contingency should FDEP not approve a Class I underground injection control permit for Units 6&7 operation? A feasibility analysis of treating wastewater for the benefit of the Biscayne Bay Coastal Wetlands/CERP project should be performed. (0025-3-22 [Kimball, Dan] [Lewis, Mark])

Response: A description of the site layout, the reactor type, and the cooling-water systems will be included in Chapter 3 of the EIS. Alternatives to the proposed method of disposal of wastewater will be presented in Chapter 9.

Comment: [T]he foregoing discussion, the NPS recommends that the EIS identify and evaluate alternative Western Transmission Corridors outside the existing boundary of Everglades National Park and connecting wetland habitats. The National Environmental Policy Act mandates that reasonable alternatives to a proposed action be evaluated. Consistent with this requirement, the EIS should evaluate other corridors that could be considered as reasonable alternatives to the segments of the West Preferred and West Secondary Corridors that run through Everglades National Park (and Water Conservation Area 3B). The NPS recommends this analysis focus on the zone between Krome Avenue and the Miami-Dade County Urban Development Boundary in order to identify potential corridors that would avoid and minimize adverse impacts to people, wildlife in the Everglades ecosystem, special status species and other natural and cultural resources. (0025-2-12 [Kimball, Dan] [Lewis, Mark])

Response: The potential impacts from building and operating transmission lines associated with proposed Turkey Point Units 6 and 7 will be addressed in the Chapters 4, 5, and 7 of the EIS. However, alternatives to the roads, pipelines, and transmission corridors proposed by FPL will not be considered in the NRC staff's analysis in the EIS because they are not alternatives to the proposed action (issuance of combined licenses) before the NRC. However, the Corps of Engineers, and perhaps the National Park Service, will be cooperating with the NRC on the EIS. To the extent that a cooperating agency addresses such alternatives for its NEPA analysis, those alternatives would likely be included in this EIS in order to support the cooperating agency's environmental review.

Comment: What alternatives are being investigated to avoid use of radial collector wells, even as a backup system? In particular, we recommend that the applicant address the ability of the project to use reclaimed water technology either in part or in full. (**0018-14** [Poole, Mary Ann])

Comment: What contingency plans are considered for alternative water sources if fish and wildlife resources demonstrate negative responses to this technology? We would expect FPL to provide for a contingency plan in their Conditions-of-Certification, should monitoring indicate that this technology is counter-productive to the recovery of Biscayne Bay. (**0018-9** [Poole, Mary Ann])

Comment: Please provide a more detailed justification (including all supporting data and assumptions) in selecting the Biscayne Aquifer Radial Collector Well alternative instead of the Floridan Aquifer and offshore (marine surface) water alternatives as secondary. (**0023-1-49** [LaFerrier, Marc])

Response: These comment are directed at the applicant and refer specifically to the SCA submitted to the State of Florida by FPL, but they indicate an interest in the cooling-water supply for proposed Turkey Point Units 6 and 7. The cooling-water source for the proposed units will be described in Chapter 3 of the EIS. Alternative water supplies will be considered in Chapter 9.

25. Comments Concerning Alternatives – Sites

Comment: We are not opposed to nuclear energy but we don't support additional reactors next to the national parks that we're trying to restore and preserve. (**0001-15-1** [Cornick, Lance])

Comment: My next concern is the risk of building nuclear reactors so close to Miami and the Everglades. (0001-19-3 [Ryan, Megan])

Comment: I understand there are alternate locations that are being looked at and considered. So I would implore the Regulatory Commission to come back with a recommendation that an alternate site that doesn't have the fragile environmental community that Turkey Point is faced with and all of the adverse impacts, take it somewhere else. (**0001-21-6** [Lerner, Cindy])

Comment: If they're sending this power north -- and somebody said we need this power here in Florida City. My God, we don't need two nuclear plants worth of power in Florida City. And if the power lines are going north, why don't they just leave them go up there and build a power plant up north instead of putting it down here? (**0001-6-9** [Miller, Lloyd])

Comment: Turkey Point is probably the most environmentally unlikely nuclear installation in the nation. If we had to do it all over again, would we really put a massive power plant complex on the border of a national park in the middle of sensitive wetlands and then convert thousands of acres of coastal mangroves into a giant radiator for two nuclear reactors? We may not have the chance to do it over, but we can certainly think better about making things worse. The environmental review of an expanding nuclear facility abutting a national park, in the middle of wetlands, that the Federal, State, and local governments have spent millions working to restore and protect, deserves extra scrutiny. (0002-1-1 [Sorenson, Katy])

Comment: The EIS should include a comprehensive evaluation of the potential impacts of constructing and operating two nuclear power plants and related facilities at the four alternate sites located in Glades, Martin, Okeechobee and St. Lucie Counties. This analysis will enable the applicant, stakeholders, decisionmakers and the general public to identify the environmentally preferable alternative and if there is an obviously superior site for the construction and operation of the proposed facilities. (0025-1-10 [Kimball, Dan] [Lewis, Mark])

Comment: A review of the Florida Power & Light Company Project Bluegrass Nuclear Power Plant Site Selection Study Report (summarized in COL Environmental Report, Section 9.3), leads the National Park Service (NPS) to question the adequacy of the site selection study. Please note that only excerpts from the site selection study report referenced above were included as pat1 of Section 9.3 of the COL Environmental Report. For instance, the Cooling Water Supply Criterion, PI, is based on an ocean intake water source (to avoid Biscayne Bay) approximately seven miles offshore as a back-up water supply source (Pages B-3, B-4, C- 93, and C-99). Therefore, it appears that the RCWs, proposed for use as a water source in the COL, may not have been evaluated as part of the site selection process. (**0025-1-6** [Kimball, Dan] [Lewis, Mark])

Comment: [T]he land use rating issued to Turkey Point was the highest (most favorable) among the eight site locations evaluated even though ecologically sensitive habitats were identified. The Report simply assumed that the Biscayne National Park would not be affected by the plant since land is owned by FPL and existing power plants/nuclear units are located there now (Page C-95). However, the RCW operation and use of the area for the CERP Biscayne Bay Coastal Wetlands project was not considered during that analysis. Furthermore, the Turkey Point location was issued the highest possible index score for possible risk of groundwater contamination, compared to the other locations evaluated (Page C-51). The Ecology/Federal RTE Species Criterion, P5, identified Turkey Point as having the highest number of threatened and endangered (T&E) species (Page B-19). The evaluation of disruption to important species was based on the Federally protected species list (22 aquatic and terrestrial species); this review did not consider State of Florida T&E species. If the NPS is to be a cooperating agency on the EIS, then impacts to state-listed and locally-listed species would need to be evaluated in this document as well (NPS Management Policies 2006 sec. 4.4.2.3). Moreover, the Wetlands Criterion, P6, did not include estuarine, marine, riverine, or freshwater pond wetland acreage in the evaluation (page B-21), all of which are required to be considered due to the potential impacts associated with the RCW operation. (0025-1-7 [Kimball, Dan] [Lewis, Mark])

Comment: Of particular concern is the fact that the Turkey Point location received an average score during the initial screening site selection evaluation (Page 16), yet that score was changed to the highest favorable score in the final general criteria evaluation (Page 23). The reason for the increase in favorability is unclear. It appears that the Turkey Point location was

given additional weight based on non-quantified socioeconomic factors. (**0025-1-8** [Kimball, Dan] [Lewis, Mark])

Comment: [T]he NPS recommends that the site selection process be re-evaluated, reflect the actual proposed features of the COL application, and consist of a more detailed and accurate comprehensive analysis that accounts for the RCW operation, state and federal T &E listed species and their habitats, conflicts with CERP Biscayne Bay Coastal Wetlands projects, and a quantifiable socioeconomic analysis. It is important that these factors be carefully considered in the process because they could significantly affect the results. (**0025-1-9** [Kimball, Dan] [Lewis, Mark])

Comment: It's location and proximity to Everglades National Park, Biscayne National Park, John Pennekamp Coral Reef State Park, and the Florida Keys National Marine Sanctuary makes it an eyesore on the coastline and a drain on the environment, not to mention the potentially catastrophic damage that would occur if there should be a radioactive release. (**0027-2** [Moses, Dorothy])

Response: The alternative site-selection process will be reviewed to determine whether it is systematic, employs reasonable selection criteria, and constitutes an acceptable number of reasonable sites for consideration. The alternative sites will be compared against the proposed site to determine whether any of the alternative sites are environmentally preferable to the proposed site. The process and results will be provided in Chapter 9 of the EIS.

Comment: The Mayors from our surrounding cities gathered and together put forth information about their concerns on the environmental impact, not just the site of the reactors, but also the transmission lines. I'm here this evening just so I can add my voice to their concerns. (0002-2-1 [Meerbott, Tim])

Response: The impacts of building proposed Turkey Point Units 6 and 7 and transmission lines will be considered in Chapter 4 of the EIS, and the impacts of operating the units and transmission lines will be considered in Chapter 5.

26. Comments Concerning Benefit-Cost Balance

Comment: The NRC should be aware that FPL's ratepayers aren't happy about the tens of millions they have already been forced to pay in advance given the pre-payment scheme in place to finance new reactors in Florida. And FP&L is asking again the troubled Florida Public Service Commission for tens of millions more with hearings set for the end of August. (0001-14-2 [Hancock, Mandy])

Comment: The FP&L has garnered several hundred millions from its ratepayers at this early stage through the Florida's Early Cost Recovery Program awarded by the Public Service

Commission. Under the program, FP&L could conceivably recoup the cost of -- the entire cost of the plant, estimated to be between 14 and 30 billion, and may not actually be required to ever build that plant. (0001-16-6 [Showen, Steve])

Comment: Determine how public investment costs will be equitably shared by all FPL rate holders, no matter what delivery system is ultimately constructed. (**0019-11** [Hamilton, Karen])

Comment: Outrageous monetary costs to rate payers. FPL is now collecting \$18 billion from its 4.5 million customers to provide nuclear electricity for 750,000 homes. (**0031-4** [De Villiers, Elena])

Response: The costs of power generation are passed on to customers. The NRC's responsibility is to regulate the nuclear industry to protect the public health and safety within existing policy. The NRC is not involved in establishing the rates paid by customers; therefore, these comments are outside the scope of the NRC's authority and will not be evaluated further.

Comment: This should be our choice, the ratepayers. Me, my family, my neighbors, we have already seen an increase in our bills to start paying for these reactors. These risky projects have a history of going over budget and taking longer than promised. (**0001-19-5** [Ryan, Megan])

Comment: Are you aware that Wall Street will not finance nuclear power plants? TP will cost around \$35,000,000,000. Divided by 4.4 million homes, that is \$8,000 per home, and then FPL will own them and we will pay 10.5% annually on FPL's free asset until they are depreciated. No wonder they want to build them, on the public's money. It will more than triple their market cap. And before I will do that, I will put in solar and go off the grid and reduce my FPL bill to about \$40 per month, and if enough people do that, who will pay for those carbuncles on the bay? Power companies have gone bankrupt. Or would Uncle Sam have to bail them out too? (**0016-7** [White, Barry])

Response: Issues related to costs associated with previous projects are outside the scope of the proposed action and will not be addressed in the EIS. The estimated overall costs and environmental impacts of the proposed project will be addressed in Chapter 10 of the EIS. The benefit-cost balance for the project will rely on the best available estimate of project timing and duration, while noting possible uncertainties that may affect those estimates.

Comment: In reality, nuclear energy is a dinosaur that would be extinct if left to market forces except for its resuscitation by huge infusions of public cash. Wall Street considers nuke power too risky to invest in and nuclear energy is the most expensive form of energy. It can't make it on its own. Hence, we see the political influence of the industry in the halls of government. (**0001-16-5** [Showen, Steve])

Comment: If nuclear energy was truly sustainable, cost-effective and truly a profitable business, the companies trying to build new nuclear plants would not have to keep going back to Congress for loan guarantees, liability insurance and tax breaks. The fact that this industry cannot obtain operating insurance by any means other than Congressional action is extremely telling! Nuclear plants are uninsurable!!!! Does that sound like an environmentally safe, economically sound business to you?! It surely doesn't to me! (**0021-15** [Wilansky, Laura])

Response: The NRC is not involved in establishing energy policy. Rather, it regulates the nuclear industry to protect the public health and safety and the environment within existing policy. Determining whether nuclear power should be subsidized is outside of the NRC's mission and authority and will not be addressed in the EIS.

Comment: I ask you to include the true costs of nuclear plants throughout their entire life cycle in your environmental calculations, including the guaranteed damage to Florida's environment. (**0021-18** [Wilansky, Laura])

Response: The benefit-cost balance for proposed Turkey Point Units 6 and 7 will rely on the best available estimate of project timing and duration, with uncertainties noted. The estimated overall costs and environmental impacts of the proposed project during both building and the 40-year operations period will be discussed in Chapter 10 of the EIS.

Comment: I am disheartened to see that a new facility can cost 10's of billions of dollars to build but we have sat around for the past 30 years so we must do something. (**0004-2** [Singer, Craig])

Response: The costs and benefits of building and operating proposed Turkey Point Units 6 and 7 will be addressed in Chapter 10 of the EIS.

Comment: I would like to first address the issue of jobs. If, in fact, the 15 to \$30 billion that Steve mentioned were manna from heaven that we would only get if we built these power plants, then I think it's worthwhile to consider, in isolation, the construction jobs and the 800 jobs that would be ongoing. If not -- and of course it's not manna from heaven -- we have to compare what 15 to \$30 billion could do spent in other ways. So I suggest that it's very much in scope to consider a cost benefit analysis that compares other ways of spending that money. (**0001-24-1** [Harum-Alvarez, Albert])

Comment: And so I would like to propose that the NRC include a cost benefit analysis that compares this proposed expansion of Turkey Point to distributed generation because, of course, that would get around the whole issue of transmission lines completely, including distribution of small nukes; building efficiency, which would create the largest number of jobs across the region; and finally, a no-build option which I suggest should always be in your comparisons because, of course, if we got to keep the 15 to \$30 billion ourselves, we would find some way to

spend it or invest it, and that would have an economic impact as well. Could very well give us our own efficiency by having us work on our houses individually. (**0001-24-3** [Harum-Alvarez, Albert])

Response: Job creation during the building and operation of proposed Turkey Point Units 6 and 7 will be discussed in the socioeconomic sections of Chapters 4 and 5 of the EIS. The benefit-cost balance for the project will rely on the best available estimate of project timing and duration, while noting possible uncertainties that may affect those estimates. The NRC benefit-cost analysis in Chapter 10 is confined to an analysis of the as-proposed facilities at the proposed location. Alternatives will be considered in Chapter 9.

Comment: The new reactors are too costly and will require too much water. (**0017-1** [Troner, Susannah])

Response: This comment expresses opposition to the cost of the project. An evaluation of the benefit-cost balance of building proposed Turkey Point Units 6 and 7 will be discussed in Chapter 10 of the EIS. Water usage will be discussed in the hydrology sections of Chapters 4 and 5.

Comment: [CASE submitted an article titled, "Proposed Turkey Point Nuclear Reactor Units 6 & 7 -Financially Prudent?" by George Cavros, Esq. The article expressed concerns about the benefit/cost balance of building nuclear reactors.] (**0003-2-2** [White, Barry])

Comment: The applicant should consider both monetary and societal costs when making decisions about infrastructure location and technology. Special attention should be given to limiting environmental, health, economic and social impacts to the surrounding communities. (**0019-8** [Hamilton, Karen])

Response: The benefit-cost balance will be discussed in Chapter 10 of the EIS and will include environmental, health, social, and monetary costs along with benefits.

Comment: [T]he two additional nuclear power plants: will take ten to fifteen years to become operational, which will make them technologically obsolete before completion. (**0012-14** [Payne, Nkenga])

Response: The long-term benefits associated with the cost of building proposed Turkey Point Units 6 and 7 will be presented in Chapter 10 of the EIS.

Comment: Please state the life-cycle costs of the water management feature(s). (**0022-3-16** [Reynolds, Laura])

Response: Hydrology will be discussed in Chapters 4 and 5 of the EIS. The costs and benefits of building and operating proposed Turkey Point Units 6 and 7 will be addressed in Chapter 10.

Comment: 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 (0022-2-10 [Reynolds, Laura])

Response: Class I injection wells are used to inject wastewater below the lowermost underground source of drinking water and have been proposed for disposal of cooling-system blowdown water by FPL. The proposed system will be presented in Chapter 3 of the EIS. Alternatives for wastewater disposal will be presented in Chapter 9. Benefit-cost analysis for the proposed units will be presented in Chapter 10.

Comment: Everglades Restoration, Biscayne Bay Restoration, is about restoring that area for its economic value, for its environmental value, and that has to be considered. This is two National Parks. Two National Parks that could be impacted by this. Biscayne Bay, and for the transmission siting aspect of it, Everglades National Park. Again, not one, but two National Parks that we're spending billions of dollars to restore because of their economic value, and the economic value of restoring them. So, again, that negative economic cost has to be considered in your analysis. (0002-6-8 [Grosso, Richard])

Response: Impacts on Biscayne National Park and Everglades National Park from building and operating proposed Turkey Point Units 6 and 7 will be discussed in Chapters 4, 5, and 7 of the EIS. The costs and benefits of the proposed project will be presented in Chapter 10.

27. General Comments in Support of the Licensing Action

Comment: I'm here to speak on behalf of the Florida City Commission in support of the construction of Units 6 and 7 at the Turkey Point location. My City Commission has previously passed a resolution in support of this particular application. (**0001-1-1** [Wallace, Otis])

Comment: And that's why my council, by a unanimous vote, supports the building of these two reactors at Turkey Point. We think it's the right thing to do and, again, let's stop talking about future energy needs and our reliance on fossil fuels and let's do something about it. Today is the time; Turkey Point is the place. (**0001-1-6** [Wallace, Otis])

Comment: We need to make sure that we're safe in regards to what we do and we need to take those threats seriously. But at the end of the day you have to understand it is about your children, giving them the hope for the future. So I want to let you know that if nothing else, you can look and you can say: At least there goes a young man who has lived at the foot of a nuclear site, whose generations of his family have lived at the foot of a nuclear site, and we're all okay. (0001-17-3 [Diggs, Bill])

Comment: I'm here to support FP&L in the construction of the two new reactors. (0001-18-1 [Landeta, Hector])

Comment: Currently, FP&L brings business to our community and we will certainly would like to see more. That is why Value Place Hotel believes strongly in the importance of this project and its positive effect to our community. (0001-18-6 [Landeta, Hector])

Comment: By expanding this plant, by capitalizing on their 30-year safety record, we end up with a situation where they will probably become the number one employer at the end of this development or at the end of this expansion. The number one employer in South Dade with the Homestead Air Reserve Base being a close second by the time this is all complete. So there are two fundamental pillars that will exist here throughout our lifetimes and our children's lifetimes. And if we want Homestead to continue to be a good place for our kids to work, go to school, and live and raise families, we need fundamental pillars like FP&L, like the reactor, the plant, and the Homestead Air Reserve Base. (0001-20-3 [Daley, Dennis])

Comment: The Economic Development Council supported a resolution in December of `07, for the addition of the nuclear reactors, number 6 and 7, at Turkey Point. (**0001-25-1** [Horton, Richard])

Comment: I'm here on behalf of the Chairman of the Board of County Commissioners in Miami-Dade County to support for FPL's application before the U.S. Nuclear Regulatory Commission to expand Turkey Point, (**0001-26-1** [Gustave, Unito])

Comment: I am therefore stating for the record that I am in full support of their request to expand the nuclear power plant at Turkey Point site. (**0001-26-5** [Gustave, Unito])

Comment: Turkey Point provides employment for this community. As a resident I support what they intend to do with the request that they have before your Board. I hope you consider it as well. (0001-27-1 [Garcia, Maria])

Comment: I know that if they build these Units 6 and 7 they'll diminish our run and they'll be good for the economy and good for the environment. I'm a Simulator Software Engineer at Turkey Point and have been with the company a year-and-a-half, and it's a very professional organization and well run. (**0001-28-2** [Fessler, Greg])

Comment: Our Chamber supports this project and thinks it's in the best interest of everyone who calls South Florida Home. (**0001-5-5** [Johnson, Barry])

Comment: Florida Carpenter's Regional Council are in support of construction and operation of Units 6 and 7 at the nuclear plant facility. (**0001-8-1** [Johnson, Michael])

Comment: We, at CASE Energy, are in favor of 6 and 7. (0001-9-4 [Martinelli, Tom])

Comment: But we believe that economically it would be a very, very good project, and we would like to state here that we agree and support the project. (**0002-10-5** [Alexander, William])

Comment: I don't see how we can survive without it. (0002-12-11 [McHugh, John])

Comment: I think that they're an asset to the community and I hope that you'll support them to be built. (**0002-13-8** [Simpson, Roce])

Comment: In my position with the Chamber, we've had resolutions from our Board of Directors and our membership over and over again for the past ten years or more in favor of what Turkey Point needs to do in their expansion. (0002-15-2 [Finlan, Mary])

Comment: I thank you for listening to my story. I ask that you please help create new stories by supporting the expansion of Turkey Point Nuclear Plant. (**0002-4-3** [del Cid, Victor])

Comment: So it goes without saying that CASE Energy's in favor of Reactors 6 and 7. (**0002-9-4** [Martinelli, Tom])

Comment: I and this committee wish that the Nuclear Regulatory Commission proceeds with this project, as its benefits far outweigh the risks. (**0003-4-6** [Accursio, James])

Comment: I am in favor of expansion at turkey point. (0004-4 [Singer, Craig])

Comment: 1st I am not opposed to expanding capacity at an existing facility. Expanding current locations has less overall impact than building a new plant (**0008-1** [Garcia, Preston])

Response: These comments provide general information in support of proposed Turkey Point Units 6 and 7 COLs. They do not provide any specific information related to the environmental effects of the proposed action and will not be evaluated in the EIS.

28. General Comments in Support of the Licensing Process

Comment: And as Americans, we are very fortunate to have a process like the one that we're having here today whereby we get watchdogs who watch over industries to ensure that they're doing what they are supposed to be doing, and also giving the American people a chance to talk about things that are important to them from their point of view. (**0001-5-1** [Johnson, Barry])

Comment: EPA Region 4 appreciates the recent invitation conveyed by NRC Project Manager Ms. Tomeka L. Terry to allow EPA Health Physicist Rick Button to attend the NRC's Site Audit, held-on June 7-10, 2010 at the Turkey Point site. We also appreciate the recent invitation extended by Ms. Terry to EPA Environmental Scientist Ron Miedema (from our Region 4 Water Protection Division's South Florida Office) to attend the NRC's Environmental Scoping Meeting

held on July 15, 2010 at the Homestead, FL YMCA. Both of these events were very helpful to EPA staff in understanding this large and complex project. (**0014-1** [Mueller, Heinz])

Comment: EPA concurs with the NRC's stated EIS-scoping goals of accomplishing the following tasks: Define the proposed action that is to be the subject of the EIS; Determine the scope of the EIS and identify the significant issues to be analyzed in depth; Identify and eliminate from detailed study those issues that are peripheral or that are not significant; Identify any environmental assessments and other EISs that are being or will be prepared that are related to but are not part of the scope of the EIS being considered; Identify other environmental review and consultation requirements related to the proposed action; Identify parties consulting with the NRC under the NHPA, as set forth in 36 CFR 800.8(c)(1)(i); Indicate the relationship between the timing of the preparation of the environmental analyses and the Commission's tentative planning and decision-making schedule; Identify any cooperating agencies and, as appropriate, allocate assignments for preparation and schedules for completing the EIS to the NRC and any cooperating agencies; Describe how the EIS will be prepared, including any contractor assistance to be used. (0014-2 [Mueller, Heinz])

Comment: The South Florida Regional Planning Council appreciates the opportunity to ensure the project's consistency with the Strategic Regional Policy Plan for South Florida. (**0019-14** [Hamilton, Karen])

Response: These comments provide general information in support of the NRC COL process. They do not provide any specific information related to the environmental effects of the proposed action and will not be evaluated in the EIS.

Comment: 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. (**0015-1** [Espinosa, Carlos])

Response: These comments provide general information in support of FPL's goal to provide safe reliable power and will not be evaluated further. The NRC will carefully review the Turkey Point Units 6 and 7 application against its regulations, which are intended to protect public health and safety and the environment.

29. General Comments in Support of Nuclear Power

Comment: But with regard to our particular community, the issue of safety we're comfortable with. The nuclear reactors we've had there for years have always been very professionally run with the oversight of the NRC. But another factor that's very important is we constantly, throughout the country, talk about lessening our dependence on fossil fuels. Everybody agrees that we should do that, but there are times when we have to act and not just talk about it. We

have an opportunity right now to meet the future power needs of this community while at the same time being sensitive to our need to get away from the Middle East-type fuels. We've got to do it; we can't simply talk about it. And I think this is an excellent opportunity to put up or shut up. (**0001-1-4** [Wallace, Otis])

Comment: Where we're talking also mainly today about the environmental, these are some numbers. The average nuclear plant avoids the emission of approximately 10,000 tons of nitrogen oxides and 32,000 tons of sulfur dioxide each year. Those are very important for us right now. (**0001-18-4** [Landeta, Hector])

Comment: Nuclear power in the long term is the most efficient form of power. Yes, the first cost is high, but the cost of fuel is low. So in the long run it's the most economic and clean fuel that we have today. Nobody has talked about the benefits of nuclear power. They haven't talked about the air and other pollutions that are derived from fossil fuels. For example, 7 million tons of CO2 per year would be generated by a fossil fuel plant. That takes 1.3 million cars off of the road. I think that's a lot of pollution that we all deal with on a daily basis. (0001-25-3 [Horton, Richard])

Comment: The use of nuclear energy is important in order to reduce our dependence on foreign oil and not of fossil fuels. (0001-26-2 [Gustave, Unito])

Comment: Number one priority for us is safety; next is to be environmentally sound; and then pretty much remind folks like you about the pros, like how efficient and how economical -- the economic impact of nuclear energy. (**0001-9-1** [Martinelli, Tom])

Comment: Nuclear power is one of the most cleanest and efficient methods of producing power we have in this country. And I know that these plants aren't going to be any different. (**0002-13-6** [Simpson, Roce])

Comment: But what I really want to express tonight is my absolute admiration of the fact that we have, with the addition of the proposed two new reactors, the opportunity to avoid the emission of over 255 million tons of CO2 into the air over a 40 year period. I just think that's an awesome figure. (**0002-15-3** [Finlan, Mary])

Comment: But right now nuclear power is the way to go. It's inexpensive, it's clean, and it's safe. And I think that the equivalent of 46 million cars off the road in 40 years is an amazing thing. And in annual terms that's 6.7 million tons of CO2 and a million cars every year. I think we need to look at that. We need to say this is a win-win situation for the environment, it's a win-win situation for Turkey Point and its employees and for the people of Miami-Dade County. I just really believe it's safe. (0002-15-5 [Finlan, Mary])

Comment: I'd like to agree with the lady from the Chamber of Commerce on the CO2 omissions. I live about two miles right now from a Florida Power and Light power plant. It's the Port Everglades power plant off of Fort Lauderdale. If you fly into Fort Lauderdale you'll see three smokestacks that generate CO2 emissions. (0002-17-1 [Eney, Douglas])

Comment: I think nuclear energy's very important in the United States. When I visit my family in Germany and France, they're heavy into nuclear power, and so is Japan, for us to be competitive. We have to make sure that nuclear power is safe in the United States if we do deploy it. We have to make sure that it will work well. (0002-17-3 [Eney, Douglas])

Comment: Unit 6 and 7, when constructed, when in operation, they will offset the carbon dioxide generation of 1.3 million cars per year. Per year, 1.3 million cars. (**0002-5-2** [Kiley, Mike])

Comment: Now, you've heard the reference to Unit 6 and 7. That is because there are five operating units there. There's three fossil units and there's two operating nuclear units. So it's important that we continue to diversify our electrical supply in this country, and we continue to reduce the reliance on fossil fuels and reduce our carbon footprint. (**0002-5-3** [Kiley, Mike])

Comment: I'm for nuclear power. It is one of the cleanest, safest, most cost effective ways of making power. If you look across the boards nuclear power costs about two-and-a-half to three cents a kilowatt to make. (0002-7-1 [Snelson, Richard])

Comment: Nuclear energy emits minuscule amounts of radiation and meets the highest regulatory standards of any industry. We'd also like to remind folks that nuclear energy is very clean. No greenhouse gases are emitted from nuclear power plants, no controlled air pollutants are emitted by the nuclear power plants, and the life cycle emissions of nuclear energy are lower than coal, natural gas, hydro power and solar energies. (**0002-9-1** [Martinelli, Tom])

Comment: Nuclear energy also helps obtain cleaner air and improve the quality of life and health for all Americans. Nuclear energy is also stable, affordable, and efficient. It's the only energy that runs 24 hours, 7 days a week, 365 days a year. It's the most cost effective energy solution and they run at about 90 percent efficiency. (**0002-9-2** [Martinelli, Tom])

Comment: As a resident of the Homestead/Florida City Area since 1955 and a person who regularly swam and fished in Biscayne Bay; over the course of 50 years I have never noticed even the slightest degree of damage as a result of the nuclear power plant. I can only imagine the amount of damage that would've been made had we used fossil fuels to supply our area with the needed electricity. (0003-4-1 [Accursio, James])

Comment: As it stands, nuclear power is a far cleaner alternative to fossil fuels or conventional coal-powered plants. The preventive measures taken to veil the public from radioactive materials used in nuclear fission is far greater than with oil, as we can plainly see with the crisis

happening in the Gulf at this moment. South Florida can prevent upwards of 6,500,000 gallons of C02 emissions a year by utilizing nuclear power plants and in the process save over \$2,000,000,000.00 a year from the tremendous efficiency that comes standard with this type of power source. (**0003-4-3** [Accursio, James])

Comment: I think it's a great idea to expand the role of nuclear power not only at Turkey Point in Florida, but nationwide. I think that the technology can support it safely, it will lessen greenhouse gasses, and it will decrease our dependence on foreign oil. (**0004-1** [Singer, Craig])

Comment: If built properly, a nuclear energy plant is a clean, safe, and efficient way for our energy needs to be met – or at least lower the need for fossil fuels to meet our needs. (0005-1 [Bass, Ken])

Comment: I am all for the any proposed nuclear powered power plants and any expansion of existing ones. We need to reduce our oil dependence and this is the one of the best ways to do it. (0006-1 [Weins, Brian])

Comment: Instead of being held hostage to the economic and political fluctuation in petroleum and natural gas markets we can choose to invest now to have stable and reliable energy cost for the future. (0006-3 [Weins, Brian])

Response: These comments provide general information in support of nuclear power. They do not provide any specific information relating to the environmental effects of the proposed action and will not be evaluated in the EIS.

30. General Comments in Support of the Existing Plant or the Applicant

Comment: As one of the two cities most closely located to the Turkey Point site, I sleep very well at night, given the tremendous safety record of Florida Power and Light and the concurrent monitoring day-to-day of the operations by the NRC. Florida Power and Light's safety record is simply excellent. (**0001-1-2** [Wallace, Otis])

Comment: I would just like to comment on the fabulous safety record that's been existing at Turkey Point. It's a 30-year record of safety and security. It's only gotten tighter and better since 9/11. And as the former Installation Commander at the Base, I can personally attest to the fact that security is paramount in their existence out there as well as safety practices. And often at the Base we looked at practices that FP&L used there to govern our organization and operate our organization. (**0001-20-1** [Daley, Dennis])

Comment: For somebody who has had the opportunity over the last 22 years to work various outages at the nuclear power plant, ladies and gentlemen, I assure you it's one of the safest

areas that we have in our town, and in the State of Florida. A worker, a construction worker who is trained, who goes out to work at that facility, the accountability with his training are held to the highest regard every single minute of every single day he's in that plant. Public safety is the utmost importance for FPL. They assure us daily of our responsibility in public safety. (0001-8-2 [Johnson, Michael])

Comment: The Turkey Point plant has been relatively safe over the last years. It's had its few problems, but every plant does. But the impact -- what is our alternative? (**0002-12-3** [McHugh, John])

Comment: I enrolled in the Miami-Dade College FPL Professional Training Pipeline. The program offered a new and exciting opportunity. I could hone my math and science skills and apply them to a technical industry working with electricity. Although I had some reservations concerning health and the safety of working in a nuclear power plant, I soon discovered that my worries were unfounded. From day one the focus of our training was around personal and public safety. As I immersed myself in the training I realized the great measures used to ensure that the power plant is operated safely and efficiently. One year into my school I began a paid summer internship with FPL at the Turkey Point Nuclear Plant. I continued my classroom studies while working hands on in the field with qualified and experienced craft workers. I was astounded by the attention of detail and the amount of attention to safety that they put into everything that they did, every aspect of the job all the time. (0002-4-1 [del Cid, Victor])

Response: These comments express support for the Turkey Point safety and security record. They do not provide any specific information relating to the environmental effects of the proposed action and will not be addressed in the EIS.

Comment: One is that FP&L is a pillar of the community here. There's several pillars that support our economic prosperity here in Florida City, Homestead and the surrounding communities. One is the Homestead Air Reserve Base; one is FP&L, as a large employer; and then one is private industry down here. Private industry suffers quite a bit due to economic crises, or it swings up and down. But the Base and FP&L have always been very consistent employers. (0001-20-2 [Daley, Dennis])

Comment: They have been a good neighbor. They've been a good neighbor to the community, to the base. After events like in 2005, with Katrina and Wilma, where they came back, we had a marvelous recovery in this local area. After Andrew we all know what they did. Of course, that's a long time gone now. But the most recent events we have to really acknowledge the fact that FP&L is one of our best community partners that we have here. (**0001-20-4** [Daley, Dennis])

Comment: Early on they talked about citations. To me citations are a testimony to the rules of safety that are provided in an oversight regulatory procedure. The key is that FPL is a

responsible community partner and has the resolve to deal with the environmental impacts, the safety, and the sustainability concerns, as well as the prudent and open dialog about the transmission lines which we've heard about here today from our smaller communities and our mayors about where the transmission lines were going. Those lines are going to be there whether it's a nuclear power plant or it's a fossil fuel plant. And I'm sure that FP&L has shown us in the past, and has today, have an open dialog with those communities and us, as citizens, to do the right thing. Everybody will have their say just like in a forum we have here right here today to speak their opinion. And I'm sure that Florida Power and Light wants to do the right thing. (0001-25-4 [Horton, Richard])

Comment: FPL has been a good provider of electrical services in our community over the years and has done a lot to be good stewards of the environment. They have acquired, for conservation purposes, large sections of environmental sensitive land in South Dade and have provided an excellent habitat for crocodiles in the ponds surrounding their facilities. (0001-26-4 [Gustave, Unito])

Comment: I'm sure that they will adhere to all of the requirements imposed on them by the Regulatory Commission. Further, I fully expect FPL to have a safety-first philosophy in order to protect their employees and the community as they embark upon expanding their nuclear power capabilities if approved. (**0001-26-6** [Gustave, Unito])

Comment: I work for FPL at Turkey Point Unit 3 and 4 Nuclear. That's the best place I have ever worked at, FPL is the best employer I've ever worked for. (**0001-28-1** [Fessler, Greg])

Comment: All 104 reactors in the country are audited by an internal group called the Institute of Nuclear Power Operations. They rank the plants. All of the eight reactors currently operated by our company are all ranked as either excellent or exemplary in performance. (**0001-3-4** [Kiley, Mike])

Comment: I'm really pleased to be here to speak in support of Florida Power and Light and the college's successful ongoing partnership, specifically with Turkey Point. We have established a professional training pipeline which certainly supports the economic growth in our local community, and also develops and retains local talent in Miami-Dade County. (**0001-4-1** [Jacobs, Jeanne])

Comment: We, representing the group of Hispanic entrepreneurs and as representatives of that sector, we applaud the efforts by FPL to give us a low cost product that will be the best product possible. (0002-10-2 [Alexander, William])

Comment: We represent thousands of working men and women through South Florida and their families. Over a period of years we have had a long-standing relationship with Florida Power and Light. During that period of time we share a common interest in the utility industry as

well as Florida Power and Light's interest in the betterment of the residents of South Florida, Metro-Dade County, as well as the end user or the consumer, their safety and their best interest. (**0002-13-1** [Simpson, Roce])

Comment: In addition to all of those items there are small issues that may come up from time to time in the process of approving these plants and building them. But history says that -- our history with FP&L says that they look at those problems, they are sensitive to the environment, they're sensitive to the consumer, they're certainly sensitive to the working men and women of South Florida, and they're going to do whatever is necessary to make sure that they satisfy the interest of each of these groups, and history says that will happen. (**0002-13-2** [Simpson, Roce])

Comment: have been working with FPL for one year and continue to receive a world-class education and training, that compliments the years that I spent at Miami-Dade College. My wife, two sons, daughter and I, now call Homestead our home. We are proud to be a part of this community and look forward to staying here while I pursue a long and fruitful career with FPL. (**002-4-2** [del Cid, Victor])

Comment: But one of the things that you'll see when you come to the site is our long-standing commitment to environmental stewardship. So that is an unwavering commitment that we owe this community. (**0002-5-1** [Kiley, Mike])

Comment: And all the nuclear reactors that we operate throughout the country, all of them are given a rating of exemplary or excellent by an independent oversight group that oversees the operation of all the nuclear power plants in the United States. (**0002-5-5** [Kiley, Mike])

Comment: In my experience with FPL, I can only commend them for their hard work and their interest in the customer's finances seeing as how they went through the trouble of examining my restaurant's power consumption on site and providing comprehensive advisement on how to save electricity and money. Since the FPL staff visited my restaurant, our savings have been substantial. (0003-4-2 [Accursio, James])

Response: These comments express support for FPL or the existing units at the Turkey Point site. They do not provide any specific information relating to the environmental effects of the proposed action and will not be addressed in the EIS.

Comment: I worked at the plant in different capacities for the last 40 years. I worked there as an Apprentice Electrician, I worked there as an Electrician, and then recently I was employed by Florida Power and Light as a Maintenance Trainer. I can tell you that the people down there are the most conscientious and the most -- it's like a family, that's all I can tell you. The people are -- number one is the plant safety which goes back to public safety. That is number one in that plant and every person down there. To the extreme, that we have human performance training, to the extreme, that we have multiple testing for every person there, and this isn't just lightly

testing. These maintenance people that are down there have to achieve 80's on every exam. So that means that they have to know what they're doing. It's just not a hit or miss. (**0002-12-2** [McHugh, John])

Comment: I feel every confidence in Turkey Point and its safety. And I am content here with my family here. I trust it. I am an old tree hugger from way back. I fought Arm and Hammer and Hooker Chemical back in the day at Love Canal. I've been part of a lot of those issues over the years. I don't think that's an issue here. I really don't believe it is. (0002-15-1 [Finlan, Mary])

Response: These comments express support for the Turkey Point safety record. They do not provide any specific information relating to the environmental effects of the proposed action and will not be addressed in the EIS.

31. General Comments in Opposition to the Licensing Action

Comment: If anything the oil spill has taught us is that safety and human error are always a factor. Right now they don't know what to do and they don't know how to solve it because it's unprecedented for them. If these two plants were to be approved, you would be in the same kind of philosophical environmental situation. (**0001-11-2** [Amor, Valerie])

Comment: So this solution is not a solution. So when the NRC wonders what their response to this should be, it should be No. (**0001-11-9** [Amor, Valerie])

Comment: I was born in South Florida, in Plantation. I live in Boynton Beach. I've lived there my whole life. I now attend the University of Central Florida and I'm a member of IDEAS, Intellectual Decisions on Environmental Awareness Solutions, and we are opposed to these two nuclear reactors at Turkey Point. (0001-19-1 [Ryan, Megan])

Comment: What are we going to do without clean water, without natural ecosystems, and without jobs? This doesn't create enough jobs; it's too much of a risk; and in order for me, and my friends, and my generation to stay in South Florida, we want clean jobs, clean energy jobs, solar power, energy efficiency. Let's focus on that and not go forward with these reactors. (0001-19-11 [Ryan, Megan])

Comment: We strongly oppose the construction of the nuclear plants at Turkey Point. Turkey Point is an unsafe situation. (**0001-2-1** [Harris, Walter])

Comment: So at the end of the day the Fish and Wildlife Service is going to write a biological opinion, and, by the way, they never turn down the building of projects in South Florida, but this one they're going turn down. (0002-14-12 [Schwartz, Matthew])

Comment: Environmentally, Turkey Point is possibly the worst place on the planet to put a power plant, let alone a nuclear power plant. It is located between two national parks, on top of the water supply for the entire Florida Keys and most of southern Miami-Dade County, in a hurricane, flood and storm surge zone, at or below sea level, next to 65,000 acres of agricultural land and 187,000 people within 10 miles on a spit of usable land less than twenty miles wide. (**0016-1** [White, Barry])

Comment: DO NOT LICENSE TP 6&7 AT TURKEY POINT (0016-13 [White, Barry])

Comment: I am not in favor of the proposal to construct two new nuclear reactors at Turkey Point in Miami- Dade County. (**0017-4** [Troner, Susannah])

Comment: I respectfully request that you conclude that the environmental risks posed by building Turkey Point 6 and 7 are unnecessary and too great. (**0021-17** [Wilansky, Laura])

Comment: You must stop Florida Power and Light's new nuclear reactor project at Turkey Point. (**0031-1** [De Villiers, Elena])

Response: These comments express general opposition to FPL's proposed Turkey Point Units 6 and 7 and will not be evaluated further. The NRC will carefully review the application against its regulations that are intended to protect public health and safety and the environment.

Comment: The only thing that I have in any hope whatsoever is that Secretary of Interior Ken Salazar will do what Secretary of Interior Stewart Udall did and take this mess to Federal Court so that we don't lose Biscayne Bay and all that it means to all of us. (**0001-6-11** [Miller, Lloyd])

Comment: These proposed plants are located in environmentally-sensitive and vulnerable areas. (**0021-1** [Wilansky, Laura])

Comment: I am actually quite horrified at the potential environmental impact of these reactors. Turkey Points' existing impact is already a problem. I would have thought that Turkey Point would be better suited for decommissioning rather than expansion. (**0027-1** [Moses, Dorothy])

Comment: Not only will there be a huge impact from the construction of the site and the destruction of natural lands to do so, but the ripple effects of operating the plant will be massive. More energy will encourage more development in Florida which is already over developed, destroying even more natural lands and putting more pressure on the water supply, wildlife and national parks. (0027-4 [Moses, Dorothy])

Comment: Please be an advocate for me, my community and the environment and refuse this application. (**0027-9** [Moses, Dorothy])

Comment: FP&L touts the creation of jobs and greener than coal-fired plants as reasons for nuclear expansion. It appears that for FP&L, issues related to Turkey Point plant safety, salt water intrusion into the aquifer and degradation of the area's specialized ecosystem hardly hold water. (**0029-1** [Guendelsberger, Debra])

Comment: Surely enough issues relating to the sighting of Florida Power and Light's Turkey Point nuclear generating plants 6 and 7 have been raised by many concerned entities from not only the general public, but other county, state and federal agencies as well as a host of non-governmental agencies, to give pause while examining FPL's application for these plants. It is the Nuclear Regulatory Commission's and the Army Corps of Engineers duty to protect not only the citizens of south Florida, but the future sustainability of its changing environment in the coming face of global climate change. Please deny the application. (**0034-6** [Kipnis, Daniel])

Response: These comments provide general information in opposition to the proposed licensing action. They do not provide specific information related to the environmental effects of the proposed action and will not be evaluated in the EIS. The NRC will carefully review the application against its regulations that are intended to protect public health and safety and the environment.

32. General Comments in Opposition to Nuclear Power

Comment: There is a reason why we've had no nuclear power plants since 1973. Because they're proven not safe. (**0001-11-1** [Amor, Valerie])

Comment: In light of the ongoing, devastating BP oil disaster, the last thing Florida and this country needs is to approve another risky energy technology such as the proposed Turkey Point reactors. We demand the utilities utilize technologies to create an energy system that does not threaten public health and devour -- and safety, nor devour economic, environmental, and water resources. The inherent power in the Earth's environmental systems, along with measures to reduce overall energy demand, can provide the energy needed without degrading ecosystems and depleting life-necessary resources. There is an opportunity to do things in different non-radioactive ways. (0001-14-13 [Hancock, Mandy])

Comment: Other people have spoken very eloquently about other issues of water usage, sea level rise, waste storage, terror attacks, and the safety of the AP1000 design. These factors are sufficient to say the precautionary principal has been exceeded many times over by nuclear power. (**0001-16-2** [Showen, Steve])

Comment: We, the public, must scope out all the factors in choosing our energy future, and that choice should be ours, not that of an entrenched powerful industry attempting to foist a costly, dangerous, and anachronistic technology upon us. (**0001-16-9** [Showen, Steve])

Comment: We need solutions fast in order to become less dependent on foreign oil and oil in general. We see how many issues it's causing. National security, the Gulf. Where are we going to draw the line? I would much rather see my rates go up for secure, safe energy such as solar than be paying for nuclear in Turkey Point. My generation and future generations deserve a life without risks, without water consumption issues, and without high energy bills. (**0001-19-6** [Ryan, Megan])

Comment: I don't think the environmental risks and safety risks are worth this project. Do our generation a favor and create us safe jobs, not ones that continue to hurt our environment and risk the safety of South Florida. With BP we saw, we're all human, we all make mistakes. That should be reason alone to not go forward with these risky nuclear reactors. (**0001-19-9** [Ryan, Megan])

Comment: We have serious concerns about the push to pursue new nuclear reactors at Turkey Point, and in the rest of the country, obviously. (**0002-18-1** [Hancock, Mandy])

Comment: [Case submittal an article titled, "Nuclear Power: The Most Expensive Form of Electricity," by Jerry B. Brown, Ph.D., Florida International University December 10, 2009. The article expresses opposition to nuclear.] (**0003-2-3** [White, Barry])

Comment: I disagree to the nuclear expansion (0009-1 [Hogsed, Daniel])

Comment: Nuclear power heats the water, leaves behind nuclear waste, and might have something to do with global warming. (**0009-3** [Hogsed, Daniel])

Comment: The City of South Miami Commission has adopted Resolution No. 141-10-13175 expressing their opposition to all plans for construction of any new nuclear power facilities and the expansion of existing nuclear power plants at FP&L Nuclear Power facility at Turkey Point, Homestead Florida. (**0012-1** [Payne, Nkenga])

Comment: If we don't have the ability to totally control oil wells in the ocean, I would say we should be humble enough to admit that we don't have the ability to totally control nuclear energy. (**0017-2** [Troner, Susannah])

Comment: Even Wall Street won't invest in nuclear power, and they'll invest in just about anything, no matter how risky! Anything except new nuclear plants! (**0021-13** [Wilansky, Laura])

Comment: After all the years of just taking the word of oil companies when they told us risk of such a gigantic oil spill was negligible, only to be proven horribly, devastatingly wrong, it's time to stop taking the word of nuclear utilities when they tell us the risks of nuclear environmental disasters, accidents and sabotage are negligible. The risks are far from negligible – in fact nuclear plants, both operating and decommissioned, put us at risk all the time. For example,

radiation from the Chernobyl meltdown decades ago is now very close to being spread by wildfires in a whole new contamination cycle. (**0021-7** [Wilansky, Laura])

Comment: No Nuclear Reactors – This is not the kind of green and enlightened direction our government should even consider – as the oil spill represents – where the government turned its head and allowed Big Business to think of profits before safety. This is no different – Big Business FPL is encouraging our government to turn its head to the disasters that are imminent in the future with nuclear power plants. (**0028-1** [DiNuzzo, Laura])

Comment: Nuclear power is unsafe and the United States imports almost all of its uranium. Nuclear power does not give us energy independence. (**0031-5** [De Villiers, Elena])

Response: These comments express general opposition to nuclear power. They do not provide any specific information relating to the environmental effects of the proposed action and will not be evaluated in the EIS.

33. General Comments in Opposition to the Existing Plant or the Applicant

Comment: Turkey Point has a long history of infractions with the NRC, including three violations in its storage of radioactive nuclear waste just last month. With vast amounts of radioactive waste already on site, allowing more reactors to be built that will generate more waste, is irresponsible when FP&L cannot safely manage what has already been produced. Despite the NRC's Waste Confidence Rule, communities in South Florida do not have confidence in FP&L's ability to manage this toxic waste. (**0001-14-1** [Hancock, Mandy])

Comment: [I]n 1968, President Lyndon Johnson signed a bill creating the Biscayne National Monument. That's why you have a nice place out here to go fishing, boating, and just plain lovely place to be. Shortly thereafter, FPL put its first oil-fired generator on the line using cooling water from the Bay and dumping used water back into the Bay. We were assured no harm would come from that. In a short time, that water had killed all life in a half square mile of bay bottom; sponges were dead three-quarters a mile away. (**0001-6-1** [Miller, Lloyd])

Comment: We've heard a lot about Turkey Point's safety, history and everything. Just last week the NRC fined Turkey Point for three infractions concerning the storage of their waste. With vast amounts of radioactive waste already onsite, allowing more reactors to be built, will generate more waste. That is irresponsible as FP&L cannot safely manage the waste that has already been produced. Despite the NRC's Waste Confidence Rule, communities in South Florida do not have confidence in FP&L's ability to manage this toxic waste. (0002-18-2 [Hancock, Mandy])

Comment: [T]he elected officials of South Miami whose job it is to protect the City's residents, strongly oppose FP&L's plans to build two additional nuclear power plants at Turkey Point, Homestead, Florida. (**0012-16** [Payne, Nkenga])

Comment: The City of South Miami is opposed to all plans for construction of new nuclear power facilities and the expansion of existing nuclear power plants at the FP&L Nuclear Power facility at Turkey Point. (0012-17 [Payne, Nkenga])

Comment: FPL has already been cited for numerous safety violations and radiation leaks in their existing plants at Turkey Point, and is already storing massive amounts of nuclear waste on site. There is NO safe amount of radiation, and the existing plants at Turkey Point have already endangered our health and safety. (**0021-8** [Wilansky, Laura])

Response: These comments express opposition to the existing units at the Turkey Point site or to FPL. They do not provide new information related to the environmental review for the proposed action and will not be evaluated in the EIS.

34. Comments Concerning Issues Outside Scope – Emergency Preparedness

Comment: This concern, coupled with the high population density of the region, should be fully evaluated by the NRC. This is especially urgent in light of FPL's accident analysis scenarios, which assume that 95 percent of the population will be evacuated if an accident occurs. In such a highly populated area, it seems unlikely that 95 percent of the population could be evacuated in a timely enough manner to avoid exposure in the event of a severe accident. Would this be possible if a serious storm or hurricane were threatening the area at the same time? I think not. (**0001-14-11** [Hancock, Mandy])

Comment: Within the 50 miles of Chernobyl lived 200,000 people, 50,000 of which have died -- and this can be documented. They never publically admitted it, but 50,000 people passed away in Chernobyl. They happened to live within 50 miles of the Chernobyl plant. Within 50 miles of Turkey Point are 3 million people. The safety precautions right now Florida Power and Light has imposed is at Florida International University there are lots of little capsules of iodine. The actual emergency procedure will be everybody must gather up their animals and leave, get out of within 50 miles which, in case you don't know, is a physical impossibility because there are no routes out of South Florida. (**0001-2-5** [Harris, Walter])

Comment: We can't get out of Miami on any given 5:00 rush hour, particularly Friday. We can't get out of Miami with four days notice of a hurricane. (**0002-11-7** [Roff, Rhonda])

Comment: [T]he safety of more than three million residents who reside within fifty miles of Turkey Point, Homestead, is being compromised with no possible evacuation plan nor

countywide emergency medical plan in the event of a natural or manmade disaster at Turkey Point. (**0012-11** [Payne, Nkenga])

Comment: In the event of a nuclear emergency, 187,000 people will attempt to evacuate in one direction, north, on three roads. The OEM estimates that this will take 7 to 8 hours; good luck. Look at what happened during the evacuation before Hurricane Rita. Panic. Loss of Life. And they had 360 degrees in which to escape; Turkey Point only has 30. Approving TP 6&7, added to two aging reactors would be a formula for disaster in such an emergency even if the local government has misguidedly said they have planned for one; right. (**0016-4** [White, Barry])

Comment: These proposed plants are located in an area which, due to its geography, absolutely does not allow for safe and timely evacuations, as we've seen during numerous hurricanes. (**0021-2** [Wilansky, Laura])

Response: Evacuation procedures and routes are an emergency planning issue and are outside the scope of the environmental review. As part of its site safety review, the NRC staff will determine, after consultation with Department of Homeland Security (DHS) and Federal Emergency Management Agency (FEMA), whether emergency plans submitted by the applicant are acceptable.

Comment: Please state the amount of sea level rise in combination with hurricane activity that would cause any uncontrolled releases of radioactivity to offsite areas. (**0022-4-18** [Reynolds, Laura])

Comment: 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. (**0022-4-20** [Reynolds, Laura])

Comment: 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. (**0022-4-21** [Reynolds, Laura])

Comment: 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. (0022-4-9 [Reynolds, Laura])

Comment: I live down wind and downstream from this plant. I used to get a brochure every year for evacuating in case of a radioactive release. Over the years the circle of danger has gotten smaller and smaller so that I no longer am included in the evacuation at all. Is that due to

successful lobbying on the part of FPL? Does radiation not travel as far as it used to? Is the industry now regulating itself? (**0027-8** [Moses, Dorothy])

Response: The radiological impacts of normal operations on the public and radiological monitoring will be addressed in Chapter 5 of the EIS. Emergency preparedness and safety design features will be addressed in the NRC staff's SER and will not be addressed in the EIS.

Comment: 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. (**0022-3-15** [Reynolds, Laura])

Comment: 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. (0022-3-19 [Reynolds, Laura])

Comment: 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. (0022-4-22 [Reynolds, Laura])

Comment: 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. (**0022-4-23** [Reynolds, Laura])

Comment: Due to the coastal location of the Turkey Point site, flooding due to severe storm events should be given special consideration. Extreme flooding could cause significant flushing of contaminants into Biscayne Bay from the Cooling Canal system due to its lower elevation (i.e., I to 3 feet above sea level). NPS does not believe the COL sufficiently analyzes or evaluates these hydrological and estuarine issues. (**0025-2-2** [Kimball, Dan] [Lewis, Mark])

Response: Management plans proposed by FPL for use while building and operating proposed Turkey Point Units 6 and 7 will be identified in Chapters 4 and 5 of the EIS, respectively. Emergency plans are outside the scope of the environmental review. As part of its site safety review, the NRC staff will determine, after consultation with the DHS and FEMA, whether emergency plans submitted by the applicant are acceptable.

Comment: 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. (**0022-4-19** [Reynolds, Laura])

Response: This comment refers to Hurricane Andrew impacts on existing Units 3 and 4. It provides no new information relevant to the environmental review of the COL application and therefore will not be evaluated further.

35. Comments Concerning Issues Outside Scope – Miscellaneous

Comment: There is growing evidence that the thousands of acres of cooling canals designed for Turkey Point 3 and 4 are exacerbating saltwater intrusion in the area, and is believed to be impeding the flow of groundwater to Biscayne National Park. If no solutions to these impacts are addressed in this application review, then you will have contributed to the degradation of our national parks and our quality of life in Miami-Dade. (**0002-1-3** [Sorenson, Katy])

Response: The purpose of the EIS is to disclose the environmental impacts of proposed Turkey Point Units 6 and 7. This comment addresses the impact of the existing power plants on the Turkey Point site which is outside the scope of the environmental review. The cumulative impact of the proposed action when added to the impact of past, present, and reasonably foreseeable future actions discussed in Chapter 7 of the EIS will consider the impact of the existing units on resources affected by the proposed units.

Comment: Because the Public Service Commission did not rule favorably for the FP&L this last time around, a shakeup in the PSC Board has ensued, raising questions about the long reach of FP&L's political influence. In addition, tens of billions of the climate bill have been earmarked for the nuclear industry. (0001-16-7 [Showen, Steve])

Comment: Florida has a very unusual political backdrop for siting power plants. It's a regulated utility state, which means that the regulated investor owned utilities make their money building power plants. We get something for that. We get safe, reliable power at the most affordable cost. But the incentive to conserve and the incentive to provide renewable, particularly distributed renewable power generation is very, very small. (**0002-11-2** [Roff, Rhonda])

Response: The NRC's responsibility is to regulate the nuclear industry to protect the public health and safety within existing policy. The NRC is not involved in establishing and administering energy policy; therefore, these comments will not be addressed in the EIS.

Comment: There will be no environmental concern from Miami-Dade County officialdom and there will be no official condemnation from the many people who have been influenced in Washington. (**0001-6-2** [Miller, Lloyd])

Comment: There are allegations -- I have no idea if they're true or not -- of collusion between our Public Service Commission and Florida Power and Light, and perhaps other utility

companies' cozy relationships. I know that a proposal for a 20-plus billion dollar power plant is enough to keep them in business for a while, and I'm glad that they're a big employer of the State. (0002-11-3 [Roff, Rhonda])

Comment: And, by the way, FP&L could lease that roof space, commercial space, government space, pay them a fee and put the solar panels up there. This is going to preclude that from happening. We don't have the money to do this ourselves. People don't have the money to take out of their pocket and put up solar roof panels, but FP&L does. And they're making a decision for all of the people in their service area that this is the way we're going to produce electricity for you. It's going to be nuclear power. (**0002-14-5** [Schwartz, Matthew])

Comment: [O]ne other thing that I experienced recently was FP&L coming into my city, the City of Fort Lauderdale, and demanding that our city sign a 30 year renewal agreement with them to be the provider of energy. And they said, if you don't we're going to take away your franchise agreement, your franchise tax that we collect for you. That's just a tax. And the city said, oh my god, we don't want to lose that. They can collect that tax themselves. They said, we don't want to lose that, we're going to sign a 30 year agreement. Now we're locked into 30 years with FP&L. (**0002-14-6** [Schwartz, Matthew])

Response: These comments relate to the applicant's business practices. The NRC's authority to regulate the applicant's business practices is limited to activities affecting nuclear safety. The comments do not implicate nuclear safety and will not be evaluated in the EIS. They are listed to compile a complete record of comments received.

Comment: Now, that reminds me of another agency which recently changed its name, the Minerals Management Service. I can't remember its new name right now, but it's the Bureau of Ocean, something, which is also funded in large part by industry-user fees. (**0002-11-5** [Roff, Rhonda])

Comment: And these plants will be located where they will be extremely vulnerable to oil spills like the BP oil eruption in the Gulf. (**0021-5** [Wilansky, Laura])

Response: These comments provide no new information relevant to the environmental review of the COL application and therefore, will not be evaluated further.

Comment: Very good people at Florida Power and Light assisted my family in the building of our house. We have a house that -- we didn't call it the Green House but they started to call it that and we've rolled with it. It's in Kendall, close to Dadeland. And our energy bills are 75 percent lower than comparable houses in the neighborhood. Folks in FPL's Demand Department were very, very helpful to us in building the house. And thanks to them, our bill last month was \$96 for a family of five. Our bill in February was \$35. (**0001-24-2** [Harum-Alvarez, Albert])

Comment: I would make one big request that maybe the NRC consider when they do this environmental impact study, and that is to ensure on a long term basis for consumers that sell electricity back to the power plant via solar power or wind energy, that through that reverse process -- it can happen with their electric meter -- that they get a significant reduction in their power plant, or the power plant at least buys that electricity back at the same rate that they sell electricity to consumers. I think that would be a very good offset, and I think it's a very important thing as far as the environmental impact. (0002-17-5 [Eney, Douglas])

Response: The environmental review focuses on significant issues related to a proposed action. Having a defined scope for the environmental review allows the NRC to concentrate on the essential issues for actions under consideration rather than on issues that may have been or are being evaluated through different regulatory review processes. The issues raised in these comments are outside the scope of the environmental review process and will not be addressed in the EIS.

Comment: In 1973 EPA issued the original NPDES permit for the Turkey Point cooling canal system. The permit contained water quality monitoring requirements for the cooling canal system. The permit was reissued by EPA and then by FDEP after the delegation of the NPDES program. The existing NPDES permit expired on May 5, 2010. Any issues associated with the reissuance of this NPDES permit (FL000 1562) should be discussed in the Draft EIS. (**0014-9** [Mueller, Heinz])

Response: The methods and results of the evaluation of water-quality impacts from building and operating proposed Turkey Point Units 6 and 7 will be described in Chapters 4 and 5 of the EIS. The impacts of the existing units are outside the scope of this review except for where they contribute to a cumulative impact when added to the impacts of the proposed action. Cumulative impacts will be presented in Chapter 7. The status of National Pollutant Discharge Elimination System permit will be identified in Chapter 5. The EIS will include citations for documents used in its preparation.

Comment: A recent study was conducted by a number of international scientists with expertise in climate modeling, risk management, policy and economics. The associated report, Ranking of the Worlds' Cities Most Exposed to Coastal Flooding Today and in the Future, by the Organization for Economic Co-operation and Development, lists the metropolitan area of Miami as the number one most vulnerable worldwide in terms of assets exposed if a 1 in 100 year surge- induced flood event were to happen today and predicts dramatic economic loss estimated at roughly \$416 billion. Economic losses are estimated to increase to \$3.5 trillion by 2070 for this type of catastrophic event. When considering climate change and projected sea level rise, the report lists Miami as one of the top ten cities worldwide for population exposure related to coastal flooding for present day conditions. Another study published in November 2007 by Tufts University, Florida and Climate Change: the Costs of Inaction, projects annual costs of inaction totaling \$92 billion by 2050 and \$345 billion by 2100, figures that constitute
2.8 percent and 5.0 percent of the state's projected Gross State Product respectively. These estimates only include economic costs from loss of tourism revenue, increased hurricane damages, at-risk residential real estate, and increased electricity costs and would be even larger if they included other sectors like agriculture, fisheries, insurances, transportation, water systems, and ecosystem damages. (0016-10 [White, Barry])

Response: Weather-related impacts on Miami are outside the scope of the EIS; therefore, the comment will not be evaluated further. The cumulative environmental impacts of building and operating proposed Turkey Point Units 6 and 7 will be discussed in Chapter 7 of the EIS.

Comment: The potential impacts from sea level rise are continuing to be a prime focus for FKAA. In South Florida, these impacts will be significant. Impacts to the water resources may accompany any large development or existing operation. The existing cooling canals at Turkey Point will have a direct response from sea level rise. As these canals are within close proximity to the Biscayne Aquifer, the rise in the sea level and the accompanying water surface rise in these canals will exacerbate the effect of sea level rise in the adjacent aquifer. EIS should take these phenomena into consideration and identify what can be done to minimize impacts from the existing canals prior to making a larger footprint; using future resources could also lead to a heightened impact from sea level rise. (0024-7 [Walker, Tom])

Response: The impacts of sea level rise on the existing units are outside the scope of this review. Cumulative impacts of building and operating the proposed units when added to the impacts of other past, present, and reasonably foreseeable actions will be presented in Chapter 7 of the EIS. To the extent that sea level rise and the existing cooling canals contribute to a cumulative impact with the proposed action, that issue will be discussed in Chapter 7.

Comment: Providing a surface water sample as a surrogate for groundwater data is inappropriate. (**0023-1-45** [LaFerrier, Marc])

Comment: The application proposes to comingle multiple wastewater streams and dispose of them via deep-well injection. It is acknowledged that, due to volume and/or water quality characteristics, it may be inappropriate to dispose of blowdown water to the County sewer system, as required by Code. The applicant shall provide sufficient information to demonstrate the project meets the requirements of Chapter 24, including but not limited to justification for why all other wastewater streams cannot be conveyed to the public sewer system. Deals with disposal of waste streams other than blowdown. (**0023-1-5** [LaFerrier, Marc])

Comment: It is acknowledged in the application that sanitary sewer connection is required unless a variance to Chapter 24, Miami-Dade Code is granted. The application, however, proposes to forego connection to the sanitary sewer, even though the facility is within feasible distance under Chapter 24. The application does not contain sufficient information to evaluate whether or not a variance to Chapter 24 can be granted. (**0023-1-57** [LaFerrier, Marc])

Comment: The application proposes the construction of an on-site sewage treatment plant (STP) in lieu of connecting to the nearest public sanitary sewer line, which is prohibited under Chapter 24 unless a variance is granted. Pursuant to Condition 6 of Z-56-07, FPL shall justify potential variances to Chapter 24. (**0023-1-58** [LaFerrier, Marc])

Comment: The disposal of the waters utilized in the cooling water system (CWS) are proposed to be combined with other sources of wastewater from the site (not including stormwater) and is to be collected in a lined sump and discharged via the proposed deep injection well system. (**0023-1-6** [LaFerrier, Marc])

Comment: The application does not contain sufficient information to demonstrate that the proposed alternatives adequately minimize and avoid adverse environmental impacts. (**0023-3-49** [LaFerrier, Marc])

Comment: For those mitigation projects proposing hydrologic enhancements, such as the S20A/L-31 E, Card Sound Road Plug, Model Lands Enhancements, and EMP seepage management, detailed information on the acreage associated with the functional lift must be provided. (**0023-3-55** [LaFerrier, Marc])

Comment: How was the risk score determined with the hydrologic improvement mitigation projects? What is the estimated uncertainty in the hydrologic improvements and ecosystem response? (**0023-3-56** [LaFerrier, Marc])

Comment: Information on costs associated with required best technologies, including the cost of liners is not provided. (**0023-3-58** [LaFerrier, Marc])

Comment: Insufficient information has been provided to determine whether the rock mine would require a variance to Chapter 24, Miami-Dade Code, and/or applicable water quality standards. (**0023-3-61** [LaFerrier, Marc])

Comment: Please submit updated U.M.A.M. and W.A.T.E.R. scores for any assessments that were performed more than one year ago. Please submit all data, field sheets, field reports and all associated information related to the preparation of the U.M.A.M. and W.A.T.E.R. analysis. (**0023-3-68** [LaFerrier, Marc])

Comment: The application does not provide information on how the proposed project will address the conditions of Zoning Resolutions #4-ZAB-559-71 and #CZAB15-11-99. Please provide this information. (**0023-4-17** [LaFerrier, Marc])

Comment: Is FPL aware that the County has a project in design very similar in function and location to the Card Sound Road Weir? Please coordinate with Miami-Dade DERM to determine

if the proposed mitigation project will be necessary or beneficial, or whether the calculated lift needs to be adjusted. (**0023-4-4** [LaFerrier, Marc])

Response: These comments are directed at the applicant and refer specifically to the SCA submitted to the State of Florida by FPL. They are so specific to that application that they do not provide information to help establish the scope of the NRC review and will not be considered further.

Comment: 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. (0022-1-10 [Reynolds, Laura])

Comment: 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. (**0022-1-11** [Reynolds, Laura])

Comment: 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 (**0022-1-12** [Reynolds, Laura])

Response: The application submitted by FPL for proposed Turkey Point Units 6 and 7 does not indicate that any water will be withdrawn from the Upper Floridan Aquifer, the Lower Floridan Aquifer, or from the remnant canal intake for building or operating the proposed units. Therefore, these comments are out of scope and will not be addressed in the EIS.

36. Comments Concerning Issues Outside Scope – NRC Oversight

Comment: I will also echo some of the concerns raised earlier by our elected officials and certainly by our mayor -- or Chairman; I'm sorry -- of the Commission, Commissioner Moss. That as long as they pay attention to the safety. I know nothing about nuclear power. I'm one that, like my family, put our hands on you and we trust that you are going to do the right thing in protecting us. And that's a lot to say, but we know that this institution, that this company provides jobs in our community. The economy is bad right now. So whatever you can do to ensure that they get the request, one, to continue providing jobs in these tough times in our

community, one; and second, to continue to ensure that the safety of the citizens is first in their mind. (0001-27-2 [Garcia, Maria])

Comment: I also know that the Nuclear Regulatory Commission is funded primarily through industry-user fees. (**0002-11-4** [Roff, Rhonda])

Comment: Now, I'm on a lot of NRC mailing lists. It seems to me -- and it's painful to read the interminable detail they go into in monitoring the safety of the facilities; Indian Point, Turkey Point, Crystal River, in Florida. But there must be something pretty dangerous going on in there for them to do that level of constant review. I'm glad they're on the task. But I believe that the Minerals Management Service was on that same task regarding offshore drilling. So my question is, how can we public, we the public, the residents of Homestead visiting this YMCA, how can we -- how can you, NRC, convince us that the safety of this new facility will be assured? (0002-11-6 [Roff, Rhonda])

Comment: The reality is, nuclear power can be safe if it's run right and managed properly. But that's the reason I expect the NRC to do its job. I'm glad there's employees on staff at NRC that are monitoring these plants at the plants. (0002-17-4 [Eney, Douglas])

Response: The NRC takes seriously its responsibility under the Atomic Energy Act of 1954 to protect public health and safety and the environment in regulating the U.S. nuclear power industry. More information on the NRC's roles and responsibilities is available on the NRC's website at http://www.nrc.gov/about-nrc.html. While the Atomic Energy Act previously defined a role for the Atomic Energy Commission in formulating a national energy policy, the Act, as amended in 1974 by the Energy Reorganization Act created the NRC from the Atomic Energy Commission's regulatory division to regulate the nuclear power industry. The Energy Reorganization Act segregated the Atomic Energy Commission's national policy role in the Energy Research and Development Administration, which later became DOE. The NRC has no role in promoting nuclear power. Rather, the Congress and the President establish the energy policy of the United States, and DOE implements that policy at the direction of the President. The NRC was created by Congress and designed so that it would not report to the same part of the government that was in charge of setting energy policy (any current Administration). The public has been given the opportunity to participate in the rulemaking process that established the regulations that govern its review process. These comments did not provide new information relevant to this EIS and will not be evaluated further.

37. Comments Concerning Issues Outside Scope – Safety

Comment: There is -- even when I read the literature it talked about the safety measures that they've had since 2011 -- since 2001. But the reality is, it was still based on human factors. There was no new technology; there was no new way to deal with this. It's not a matter of when

the accident will -- or if the accident will happen; it's a matter of when the accident will happen. (**0001-11-6** [Amor, Valerie])

Comment: Can they guarantee that an accident will never occur? Let's remember that the oil disaster Gulf communities are now grappling with was also supposed to be a very unlikely event. A recent technical report by Mr. Arnold Gundersen, a nuclear engineer with decades of industry experience, raises serious concerns about the safety of the AP1000 reactor design, concluding that the containment vessel is less safe than current reactors that have had a history of containment failures. (0001-14-10 [Hancock, Mandy])

Comment: A 1982 Congressional report estimated that if a meltdown occurred at just one of the existing Turkey Point reactors it could cause 29,000 peak early fatalities -- that's 29,000 deaths in one year, and that's based on 1982 population numbers -- and \$48.6 billion in property damage, also based in 1982 money. It's a lot more now. (**0001-14-12** [Hancock, Mandy])

Comment: In light of the recent BP Gulf disasters, I am reminded of what can go terribly wrong in a system where the potential for catastrophe is inherent within it. Chernobyl and Three Mile Island are testament to that, notwithstanding technical improvements since then as is the elaborate safety precautions, around-the-clock operational monitoring, and agency oversight required to protect us from the failures of nuclear power. And should the unspeakable happen, unlike in the case with BP, the U.S. Government is responsible for the financial losses. That's you and I, John Q. Public. (0001-16-1 [Showen, Steve])

Comment: Turkey Point is an unsafe situation. And I have here information which is printed out and been researched. Since 1972 and `73, when the two plants, 3 and 4, went online, there have been 50 citations and problems serious enough that in 1988 the NRC threatened to close the nuclear power plants completely. Florida Power and Light seemed to have gotten their act together during the `90s. However, since 2002, there have been 19 major citations; since 2008, there have been 12; and last year, 2009, there were 8 major citations. Florida Power and Light was fined \$25 million by the State last year, which seems like a lot. And although that seemed like a lot, it was just the price of doing business for Florida Power and Light. (**0001-2-2** [Harris, Walter])

Comment: My son plays baseball in the field right behind us. So it's extremely important that we operate these facilities safe and reliably. The ownership we have is for ourselves, our families, our community, and really the infrastructure of the United States. (**0001-3-2** [Kiley, Mike])

Comment: Can we really know for sure that we will never have a radiological release that will require evacuation? Can we know that? I need to know that before I would ever put my seal of approval on this plant. Can we know that? Can we be assured of that? You may say the answer is, yes. But if you do, I have to look back to MMS and the Deep Water Horizon and say, can I believe it? I know everybody's doing the best job they can, but is it good enough to assure

that we will never, ever have a problem? Because a problem would be so devastating to the people in the area. (**0002-11-8** [Roff, Rhonda])

Comment: I'm going to close with one statement about the dangers, the general dangers. I guess we would call this a low probability-high impact activity -- event if something went wrong at Turkey Point. And, by the way, Turkey Point does have a track record; numerous safety violations in addition to the one I told you about with the storage of nuclear fuel; numerous security problems. But we've become used to these low probability-high impact events, because we're going through one right now. And we were told that this couldn't take place. (0002-14-11 [Schwartz, Matthew])

Comment: [T]he International. Atomic Energy Commission has stated that little can be done to protect nuclear-facilities such as Turkey Point from an airborne terrorist attack or an attack on spent fuel. (0012-12 [Payne, Nkenga])

Comment: [S]ince 1972 FP&L's Turkey Point nuclear reactors have had a history of safety issues resulting in more than fifty citations from the Nuclear Regulatory Commission and other environmental and safety problems, including more than twenty citations and safety issues since 2008. (**0012-3** [Payne, Nkenga])

Comment: [M]ore than two million pounds of nuclear waste are stored at Turkey Point. (**0012-4** [Payne, Nkenga])

Comment: The Draft EIS should address safety concerns as it relates to protection of the surrounding communities and storage of waste material. (**0014-19** [Mueller, Heinz])

Comment: And one more thing: one little nuclear incident – whether caused by equipment malfunction, operator error or terrorist attack – could literally mean the end of ALL life on earth. If you think it can't happen, think about that little O ring on the Challenger. We in Florida haven't forgotten the Challenger tragedy, have you? We humans are not infallible, and neither is anything we produce. This means that nuclear plants cannot, simply cannot be guaranteed to be safe. And when it comes to nuclear materials, anything less than 100% safety is just not good enough. (**0021-16** [Wilansky, Laura])

Response: Safety issues are outside the scope of the environmental review and will not be addressed in the EIS. The applicant's safety assessment for the proposed licensing action was provided as part of proposed Turkey Point Units 6 and 7 COL application. The NRC is developing an SER that analyzes all aspects of reactor and operational safety.

Comment: Sea level rise changes the nature of all of those impacts, exacerbates the nature of all of those impacts. The idea of putting major nuclear reactors in an area this susceptible to sea level rise and is susceptible to hurricanes, should be very troubling from a safety and from

an ecological environmental standpoint. This is basically Ground Zero in the United States of America for hurricanes, in terms of frequency and in terms of impacts. That has to factor into the environmental analysis of this project. (0002-6-6 [Grosso, Richard])

Comment: [G]lobal warming and rising sea levels are a real danger to Turkey Point which was only five feet above sea level in 1972, and Turkey Point is in a hurricane and storm surge zone. (**0012-5** [Payne, Nkenga])

Comment: The Draft EIS should discuss hurricane design considerations and how sea level change might be incorporated into the project. EPA recommends a "risk based" analysis be performed for each alternative based on low, intermediate and high rates. Local mean- sea level trends may be higher than the rate of eustatic mean sea-level rise. (**0014-13** [Mueller, Heinz])

Comment: 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. (**0022-1-2** [Reynolds, Laura])

Comment: 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. (**0022-1-3** [Reynolds, Laura])

Comment: The Report does not provide flood information for the 100-year, 3-day storm event, which is part of the evaluation of the local requirements for flood protection for all building floor elevations. (0023-1-12 [LaFerrier, Marc])

Comment: The flooding analyses should account for the implementation of all CERP project features, which may enhance flooding in the vicinity of the Turkey Point facility. 2. A thorough review of Hurricane Andrew site specific data should be performed, including storm tide level. 3. Hurricane Andrew data were not reported in the Peak Water Levels history, Tables 2.4.2, Part 2, FSAR. Data for Hurricane Andrew should be included in this analysis. 4. Rapid groundwater table seepage during storm events is inherent to this region due to high infiltration rates. The flooding analyses should be verified and be based on local hydrogeology. (**0025-3-23** [Kimball, Dan] [Lewis, Mark])

Response: Safety issues related to weather, hurricane, and sea level rise impacts to existing units and proposed Turkey Point Units 6 and 7 are outside the scope of the environmental review and will not be addressed in the EIS. However, the NRC is developing an SER that analyzes all aspects of reactor and operational safety. In addition, the environmental impacts of

the operation of proposed Turkey Point Units 6 and 7 will be presented in Chapter 5 of the EIS. The EIS will include citations for documents used in its preparation.

Comment: One thing I think they didn't mention on the environmental lines was, what will happen with one or two or three feet of sea level rise? Where will this plant be? Will it be an island? Is this a wise place to put it? Will that sea water and with the increasing storm intensity under the worse scenarios of climate change, will the containment structure actually hold? (**0002-11-1** [Roff, Rhonda])

Comment: The Draft EIS should discuss any remaining design issues with the AP 1000 reactor, which we understand received design certification from the NRC in 2006. EPA understands that Westinghouse has submitted revisions to the certified design for purposes of reducing cost and financial risk to buyers, affording extra protection against large aircraft crashes, improving instrumentation & control, and improving pipe layouts. It was later reported to EPA that in October 2009 the NRC would require Westinghouse to perform a corrective design on the AP1000 reactor shield building. (**0014-11** [Mueller, Heinz])

Response: These comments express concern about the design of proposed Turkey Point Units 6 and 7. The EIS is concerned with the potential effects of building and operating the proposed units on the environment. Therefore, these comments are not within the scope of the environmental review and will not be addressed further. The SER will address reactor design and construction in detail. The NRC staff will monitor the construction of the proposed units if COL licenses are issued.

38. Comments Concerning Issues Outside Scope – Security and Terrorism

Comment: I'm a resident of Palm Beach County in Southeast Florida, where we currently have 80 percent of Florida's nuclear power plants. Remarkably, we can't buy insurance to protect ourselves from a nuclear disaster. Ironically, the electric utility requires 100 percent loan guarantees from the Federal Government to shield it from risks of a terrorist attack if it builds new reactors for a nuclear power plant down here. (**0001-13-1** [Smilan, Stan])

Comment: We concede that Florida Power and Light can operate a safe nuclear power plant. That is not the issue and that is not the way to frame the issue. The way to frame the issue is this: That Florida Power and Light and the NRC have a reckless disregard for the heightened risk of a terrorist attack in Southeast Florida. (0001-13-10 [Smilan, Stan])

Comment: my reason for appearing here this afternoon is to object to an inadequate environmental report submitted in the FPL application in this licensing proceeding. As a resident and as a citizen in this democracy, I appeal to the NRC that they should require an

environmental impact statement that provides a comprehensive assessment of the consequences that would result from a terrorist attack at this proposed nuclear power plant. (**0001-13-2** [Smilan, Stan])

Comment: The Union of Concerned Scientists contends that a terrorist attack on such a facility and its on-site storage of nuclear waste in the cooling ponds could result in the release 20 to 30 times the amount of radioactive material as measured in curies that was released into the atmosphere at Chernobyl in 1986. Now, it's noted on page 154 of the Barnes and Nobles edition of the Official 9/11 Commission Report that the initial conceptualization of the Al-Qaeda plot was to highjack 10 to 11 airplanes and crash some of them into nuclear power plants in addition to the national symbols that Al-Qaeda attacked on 9/11. Also, the 9/11 Commission Report states that Mohammad Atta was considering a nuclear power plant just north of the World Trade Center as his secondary target. Now, these pieces of information are sufficient cause for concern, especially so when coupled with the site-specific facts that prior to 9/11, Mohamad Atta, a member of the Muslim Brotherhood Jihadists, was living in Delray Beach and shared apartments with other members of the Al-Qaeda terrorist group. Mohamad Atta was the lead pilot who crashed one of my airline's airplanes into the World Trade Center. The NRC should be made aware that the Delray Beach is situated in the midpoint equal distance between St. Lucie and Turkey Point nuclear reactors. St. Lucie and Turkey Point are 135 miles apart. (0001-13-3 [Smilan, Stan])

Comment: Now, of most significance and very alarming is the fact that the second largest Jewish population in the United States is concentrated in the tri-county area consisting of Miami Dade, Broward, and Palm Beach Counties, and that's between these two nuclear power plant sites. A cascading effect of a terrorist attack on the nuclear plants would've been transgenerational genocidal events due to the unleashing of ionizing radiation from radioactive fallout causing irreversible genetic damage and genetic mutations that manifest into cancer over a long latency period. (0001-13-4 [Smilan, Stan])

Comment: Additionally, it should be noted that all major roads pass through the 10 mile evacuation zones of St. Lucie and Turkey Point. In a worst case scenario of simultaneous attacks on St. Lucie and Turkey Point, that disrupted the water supply in the cooling ponds, the human population could be subjected to lengthy exposure periods that would increase total body absorption to ionizing radiation. Such attacks could be launched by relatively small aircraft evacuating from the Caribbean in advance of an impending hurricane, and manned by suicide bombers functioning as Kamikaze pilots. (0001-13-5 [Smilan, Stan])

Comment: Now, whereas the Department of Energy has a legitimate role in promoting atomic energy, the NRC is tasked solely with the regulation of safe practices for the use of nuclear materials. However, it appears that the NRC has overstepped its authority and is illegally and actively engaging in promotion of nuclear power by obfuscating and omitting from environmental impact statements, the true risks and consequences of a terrorist attack on a nuclear power

plant. Now, the perception is this: That the NRC is on an unauthorized rescue mission to provide the electric utilities with a profitable means to survive as a monopolistic growth industry. Nuclear power is three times more profitable for the electric utility industry than conventional power plants. (0001-13-7 [Smilan, Stan])

Comment: I urge the NRC to include in the EIS a comprehensive assessment of the environmental impacts of a terrorist attack. There is a greater probability of a terrorist attack than an accident at a nuclear power plant in Southeast Florida. (**0001-13-9** [Smilan, Stan])

Comment: I am submitting this article and the comments on it as my public statement. [The commenter submitted an article titled, "Nuc Plant Terriorist Safety Plan: You will not believe this story," by Geniusofdespair. This article expresses concerns about terriorist attacks on nuclear plants.] (**0010-1** [Lee, Nancy])

Response: Comments related to security and terrorism are safety issues that are not within the scope of the environmental review. The NRC is devoting substantial time and attention to terrorism-related matters, including coordination with the DHS. As part of its mission to protect public health and safety and the common defense and security pursuant to the Atomic Energy Act of 1954, the NRC staff is conducting vulnerability assessments for the domestic use of radioactive material. Since the events of September 11, 2001, the NRC has identified the need for license holders to implement compensatory measures and has issued several orders to license holders imposing enhanced security requirements. Finally, the NRC has taken actions to ensure that applicants and license holders maintain vigilance and a high degree of security awareness. Consequently, the NRC will continue to consider measures to prevent and mitigate the consequences of acts of terrorism in fulfilling its safety mission. Additional information about the NRC staff's actions regarding physical security since September 11, 2001, can be found on the NRC's public website (www.nrc.gov).

Summary

By letter dated June 30, 2009, FPL submitted to the NRC an application for COLs for Turkey Point Units 6 and 7 to be located at the Turkey Point site in Miami-Dade County, Florida.

On June 15, 2010, in accordance with 10 CFR 51.26, the NRC initiated the scoping process by publishing a Notice of Intent to Prepare an Environmental Impact Statement and Conduct Scoping Process in the *Federal Register* (75 FR 33851). The Notice of Intent notified the public of the staff's intent to prepare an EIS and conduct scoping for the COL application. Through the notice, the NRC also invited the applicant; Federal, Tribal, State, and local government agencies; local organizations; and individuals to participate in the scoping process by providing oral comments at the public meetings and/or submitting written suggestions and comments no later than August 16, 2010. Public scoping meetings were held at the Homestead YMCA located at 1034 Northeast 8th Street, Homestead, Florida, on July 15, 2010. Comments were consolidated and categorized according to topic within the EIS or according to the general topic if outside the scope of the EIS. The comments, along with the responses prepared by NRC staff, are presented in this Scoping Summary Report.

The draft EIS for FPL's COL application will address the relevant environmental issues raised during the scoping process. The draft EIS will be made available for public comment. Interested Federal, Tribal, State, and local government agencies; local organizations; and members of the public will be given the opportunity to provide comments on the draft EIS. The review team will consider these comments during the development of the final EIS.