(3) 11/2/10
75 FR 67406

Based on some of the comments at the scoping meetings held at the Victoria Community Center Dome in Victoria, Texas on December 2, 2010, I am submitting my comments on the Exelon Nuclear Texas Holdings, LLC; Victoria County Station Early Site Permit Application submitted March 25, 2010. This is also being submitted by the Federal register Vol.75, No 211, November 2, 2010 / Notices page 67407.

SEEPAGE FROM THE COLLING WATER PONDS

In the application there is wording about seepage. Will any of this seepage eventually flow into the Gulf Coast Aquifer?

SOIL CONDITIONS AT THE SITE

There has been reported, one I have personal knowledge about in my lifetime, within about 5 miles of the proposed Exelon site, that a drilling rig and all the equipment was totally lost in a quick sand strata due to vibration during drilling operation. I recall it was also pointed out at the afternoon hearing on December 2, 2010 held at the Victoria Community Center that a similar event occurred losing equipment on the proposed site during a drilling operation. With our soil conditions, will the weight of the reactors and even minor vibrations cause the reactors to sink after being on line for a relatively short period of time?

GROUND WATER

It is my understanding that no one or organization has determined how the Gulf Coast Aquifer recharges. I believe it is generally known that Salt Water intrusion can and has occurred when draw down has been great in dry years. Besides Cities in and around the surrounding counties of Victoria, local industries use this water for some of their operations. In the application by Exelon some of this water is projected to be used for the plant operation. With the current activity of drilling and fracturing to produce Natural Gas in adjacent counties to and near Victoria County, unknown additional quantities of the Gulf Coast Aquifer water will be used for fracturing and not accounted for by the local Ground Water District. It is my understanding that the reason for this is that the Railroad Commission of Texas when granting a well drilling permit also grants and gives the right to as much water as is required for the drilling and operation of the well. The Railroad Commission of Texas rules DO NOT REQUIRE APPROVAL from the local ground water district!

In view of the above how will this impact on the suitability of this site?

SURFACE WATER

Like with groundwater there is only historical data on availability. There is no guarantee of future volumes. In fact within the next 20 years (permit time limit on this early site permit), there will be mandated environmental flows by the State of Texas. Currently there is a proceeding underway to determine the minimum environmental flows from the Guadalupe and San Antonio Rivers to keep the Bays and Estuaries Alive!

While this early site application does not seem to cover any water for cooling except by the use of surface and rainwater one would think alternatives would be addressed. With the shortage of fresh water and hence it's higher cost other proposals would have been proposed in the early site application. Since a large number of BTU's must be removed by the cooling ponds could and should these be removed in the process of desalinating brackish and/or seawater in the process of cooling? This water could then replace the groundwater required for the production of steam as well as having left over water for sale!

I respectfully submit my comments for consideration.

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