

May 10, 2011

L-2011-182 10 CFR 50.4 EPP 3.2.2

U. S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, DC 20555

Re: St. Lucie Units 1 and 2 Docket Nos. 50-335 and 50-389 Environmental Protection Plan Report <u>316(b) Related Documentation</u>

Pursuant to section 3.2.2 of the St. Lucie Environmental Protection Plan, FPL is forwarding the attached copy of 316(b) related documentation. The matter pertains to request for information (RFI #1) response to the St. Lucie Ambient Monitoring Report Feasibility Study required by the revised St. Lucie Plant Industrial Wastewater Facility (IWWF) Permit No. FL0002208 and Condition 14 of the Administrative Order (AO) AO022TL.

Please contact Vince Munne at (772) 467-7453 if there are any questions on this matter.

Sincerely,

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Eric S. Katzman Licensing Manager St. Lucie Plant

ESK/tlt

Attachment



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May 10, 2011

Marc Harris, P.E. Supervisor, Power Plant NPDES Permitting Industrial Wastewater Section Florida Department of Environmental Protection 2600 Blair Stone Road, MS 3545 Tallahassee, Florida 32399-2400 CERTIFIED MAIL RETURN RECIEPT REQUESTED 7006 3450 0003 0174 4219

Florida Power & Light Company, 6501 S. Ocean Drive, Jensen Beach, FL 34957

RE: St. Lucie Plant - State IWWF Permit No. FL0002208 Response to Request for Additional Information (RFI No. 1) - Ambient Monitoring Report

Dear Mr. Harris:

Please find three (3) enclosed copies of Florida Power & Light Company's (FPL) response to the Florida Department of Environmental Protection's (FDEP) Request for Additional Information, RFI No. 1, Ambient Monitoring Report, Comments 1 and 2.

FPL is not requesting that the FDEP approve the Ambient Monitoring Report (AMR) at this time. Instead, FPL is again seeking the Department's approval to incorporate the collection of ambient temperature data into the Heated Water Plan of Study (HWPOS), in lieu of permanently sting thermometers in the Atlantic Ocean. The need for installing permanent ambient temperature sensors in the Atlantic Ocean can be revisited once the ambient temperature data obtained during the HWPOS has been analyzed and compared to the St. Lucie Plant's current method of monitoring the temperature of the influent.

Please contact Ron Hix at (561) 691-7641 if you need additional information on this matter.

Sincerely,

Richard L. Anderson

Site Vice President St. Lucie Plant

VPPSL012

Enclosure

cc: FDEP – SE District – Linda Brien, FDEP – PSL Office – Terry Davis FDEP – Tallahassee - Siting Office – Mike Halpin

an FPL Group company

St. Lucie Units 1 and 2

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Enclosure

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Ambient Monitoring Report

 On page 4, Golder Associates commented that the modeling results predict the thermal plume can extend out to about 5 miles in any general direction from the outfall diffuser ports, but stays confined to the upper 5 to 10 feet of the water column. Golder Associates suggests a vertical array of temperature sensors at a monitoring site within the five mile radius of the thermal plume, yet at a distance far enough away from the diffusers and nearer to the intake where ambient conditions supersede.

The Department believes this is a reasonable approach provided the ambient monitoring station measures temperatures of the thermal plume under certain conditions. As there are no data available to assess if and when these conditions occur, the monitoring site will need to be deployed for a sufficient period of time in order to interpret and filter the data signals. Another condition in the Administrative Order that requires model verification of the thermal plume should provide other needed information to assist with data interpretation from the ambient temperature monitoring site.

Response:

FPL letter LIC-PSL-2011-018, dated March 18, 2011, requested the Department's approval to incorporate ambient temperature monitoring for the St. Lucie Plant into the Heated Water Plan of Study (HWPOS), in lieu of permanently siting remote thermometers in the Atlantic Ocean as specified in AO022TL, Condition 14.

Specifically, as part of the HWPOS (AO022TL, Condition 17), FPL is proposing to install ambient temperature sensors in the same locations in the Atlantic Ocean that have been described in the Ambient Monitoring Report (AMR). The HWPOS will be conducted for a minimum of 24 months, a time period which FPL believes will be sufficient to obtain representative ambient temperature data.

The HWPOS will be submitted to the Department for review and approval by June 21, 2011.

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Ambient Monitoring Report

2. The last comment on page 19, "In the event of data interruption it is proposed that the ambient temperature of the RBW for regulatory purposes will be determined at the Plant intake structure within the intake canal (INT-1; NPDES permit number FL0002208) until the ambient monitoring station can be repaired or replaced" requires clarification. It is our understanding that INT -1 will be operationally maintained in conjunction with the ambient temperature monitoring site. In this way, the Department can compare data to determine if INT-1 is a good representative site for ambient temperature measurements in the future.

Response:

In lieu of installing a permanent ambient monitoring station in the Atlantic Ocean as described in AO022TL, Condition 14 and the AMR, FPL has proposed to continue to implement IWWF Permit FL0002208, Condition 1A, using the temperature sensor currently designated as INT-1, which will be operationally maintained.

The need for installing permanent ambient temperature sensors in the Atlantic Ocean can be revisited once the ambient temperature data obtained during the HWPOS has been analyzed and compared to the data obtained from INT-1.