PMLevyCOLPEm Resource

From: Wilkins, Tillie [tillie.wilkins@pgnmail.com]
Sent: Tuesday, September 20, 2011 1:46 PM
To: 'osvaldo.collazo@usace.army.mil'; 'gordon.a.hambrick@usace.army.mil'; Bruner, Douglas; 'gagliano.paul@epa.gov'; 'DavidA Pritchett'
Cc: Snead, Paul
Subject: Progress Energy Response #1 to 6/23/11 USACE Letter
Attachments: NPD-MISC-2011-014 - Signed Letter without att.pdf

Please see the attachment for Progress Energy's initial set of responses to the June 23, 2011 letter from USACE concerning the Levy Nuclear Plant. Note that due to file size, the attachments are not included with this advance distribution. Hard copy distribution will include the CD with the attachments.

Tillie Wilkins
Nuclear Plant Licensing
New Generation Programs & Projects
Progress Energy
VNet: 770-6754
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Subject: Progress Energy Response #1 to 6/23/11 USACE Letter
Sent Date: 9/20/2011 1:45:52 PM
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From: Wilkins, Tillie

Created By: tillie.wilkins@pgnmail.com

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Options
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Return Notification: No
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Progress Energy

Serial: NPD-MISC-2011-014
September 20, 2011

Mr. Osvaldo Collazo
Chief, North Permits Branch
Department of the Army
Jacksonville District Corps of Engineers
Panama City Regulatory Office
1002 West 23rd Street, Suite 350
Panama City, Florida 32405-3648

Levy Nuclear Plant/PEF
SAJ-2008-00490 (IP-GAH)
Response #1 to Corps Position Letter dated June 23, 2011

References:
1. Letter from Osvaldo Collazo (USACE) to John Elnitsky (PEF), dated June 23, 2011, Reference: SAJ-2008-00490 (IP-GAH)
2. Letter from John Elnitsky (PEF) to Osvaldo Collazo (USACE), dated July 22, 2011, Reference: Levy Nuclear Plant/PEF, SAJ-2008-00490 (IP-GAH), Serial: NPD-MISC-2011-010

Dear Mr. Collazo:

The purpose of this letter is to provide the first set of responses to your letter dated June 23, 2011 (Reference 1) regarding positions, comments, and requests for information concerning a requested CWA § 404 permit associated with construction of the Progress Energy Florida (PEF) Levy Nuclear Plant (LNP) and various associated integral projects. As stated in our letter dated July 22, 2011 (Reference 2), PEF is working on responses to your requests, and as materials become available, we will provide them to you. Accordingly, a response to seven of the USACE requests is addressed in the enclosure to this letter. We expect all responses to be complete and submitted to your office no later than November 18, 2011.

If you have any questions regarding this letter, or need additional information, please contact me at (919) 546-6992 or Paul Snead at (919) 546-2836.

Sincerely,

Robert Kitchen
Manager, Nuclear Plant Licensing
New Generation Programs & Projects

Enclosure / Attachments (on attached CD)

Progress Energy Florida, Inc.
P.O. Box 14042
St. Petersburg, FL 33733

cc: Gordon Donald Hambrick, USACE
Douglas Bruner, USNRC
David Pritchett, EPA
Paul Gagliano, EPA

Levy Nuclear Plant Units 1 and 2
Response #1 to Corps Position Letter for USACE-SAJ-2008-00490, dated June 23, 2011

RAI #	PEF RAI #	Progress Energy Response
EPA #1	L-0960	Response enclosed – see following pages
EPA #2	L-0961	Response enclosed – see following pages
EPA #3	L-0962	Response enclosed – see following pages
EPA #4	L-0976	Response pending in a future submittal
EPA #5	L-0975	Response pending in a future submittal
EPA #6	L-0980	Response pending in a future submittal
EPA #7	L-0978	Response pending in a future submittal
EPA #8	L-0968	Response pending in a future submittal
EPA #9	L-0981	Response pending in a future submittal
EPA #10	L-0963	Response enclosed – see following pages
EPA #11	L-0969	Response pending in a future submittal
EPA #12	L-0984	Response pending in a future submittal
EPA #13	L-0979	Response pending in a future submittal
NMFS EFH #1/Corps NMFS #1	L-0970	Response pending in a future submittal
NMFS EFH #2/Corps NMFS #1	L-0971	Response pending in a future submittal
NMFS EFH #3/Corps NMFS #2	L-0972	Response pending in a future submittal
NMFS EFH #4/Corps NMFS #3	L-0973	Response pending in a future submittal
NMFS EFH #5	L-0974	Response pending in a future submittal
LEDPA – CORPS #1	L-0964	Response enclosed – see following pages
LEDPA – CORPS #2	L-0985	Pending resolution of USACE GW modeling
LEDPA – CORPS #3	L-0965	Response enclosed – see following pages
LEDPA – CORPS #4	L-0966	Response enclosed – see following pages
CORPS – OTHER #1	L-0967	Response pending in a future submittal
CORPS – OTHER #2	L-0977	Response pending in a future submittal
CORPS – OTHER #3	L-0982	Response pending in a future submittal
CORPS – OTHER #4	L-0952	July 22, 2011; Serial NPD-MISC-2011-010
CORPS – OTHER #5	L-0983	Response pending in a future submittal

USACE Letter No.: Corps Position Letter USACE-SAJ-2008-00490(IP-GAH)

USACE Letter Date: June 23, 2011

USACE RAI #: EPA-1

Text of USACE RAI:

Provide an analysis of alternatives to avoid and minimize impacts to high quality wetlands, associated with the installation of pipelines, including alternatives such as tunneling or horizontal directional drilling.

PGN RAI ID #: L-0960

PGN Response to USACE RAI:

As part of the ongoing efforts to minimize project wetland impacts, Progress Energy Florida (PEF) conducted a detailed analysis of the right-of-way (ROW) location and construction techniques associated with the installation of cooling tower makeup water and blowdown pipelines, and raw water supply pipelines. Collocating the ROW with existing disturbed linear facilities such as existing roadways, the Cross Florida Barge Canal (CFBC), and transmission lines limits the creation of a new ROW and minimizes impacts. South of CFBC, the blowdown pipeline ROW was relocated to avoid impacting 4.5 acres of estuarine emergent marsh. The use of previously disturbed area is maximized by siting the blowdown pipeline through an upland spoils area created from the original excavation of the CFBC, and then through an active mining area. On the LNP property, pipelines will be installed adjacent to the heavy haul road in order to minimize impacts to adjacent wetlands. The elimination of the estuarine emergent marsh from the blowdown pipeline ROW has eliminated the impacts to these high quality wetlands. The remaining wetlands to be impacted by the project have been previously impacted for decades by silviculture and mining activities. A more detailed analysis of avoidance and minimization is further addressed in a forthcoming response to USACE RAI #: Other #2.

Review of Construction Techniques

Most of the pipeline is located in uplands or adjacent to existing linear facilities such as roads, canals, or power line corridors. In these areas, below-grade pipeline installation was determined to be preferable to abovegrade or at-grade installation due to the operational disadvantages of the exposed piping installation options, such as degradation of plastic pipes due to UV (sunlight) exposure, or rusting of metal pipes due to weather exposure, pipe rack requirements at crossings, etc.

Below-grade technologies evaluated were those generally employed for pipeline installation and included pipe ramming, horizontal directional drilling (HDD), microtunneling, jack and bore, and trenching. Because trenching with a trench box is a continuous process with land restoration occurring as the pipeline is installed, impacts to the area and the amount of time the area is disturbed by the construction are minimized, compared with methods such as HDD or tunneling. The construction of one trench to install the six large-diameter pipelines simultaneously will be significantly faster and less costly than these other methods, in which one pipe is installed at a time by underground drilling or tunneling technologies. In addition, because of the friction associated with the installation of larger diameter pipes such as the makeup and blowdown pipelines, the maximum length of each run before the next pipe exit/re-

entry pit is required could be as short as 1,000 to 2,000 feet, which requires a land use footprint at that interval for the entire length of the pipeline installation. Direct-trench installation also allows for more adjustment and correction of pipeline azimuth and elevation during the backfilling process than other methods. For these reasons, trenching is the preferred technology for this project.

Trenching will be conducted using trench boxes or sheet-piling. Dewatering will be performed during pipeline installation via a well point system. The groundwater that is collected will be disposed of in accordance with applicable State of Florida regulations, or recirculated into the ground on the site. Excavated topsoil will be stockpiled and reused to restore the site. Excavated spoils will be stockpiled in the blowdown pipeline ROW, and hauled off for use as general fill during plant construction. Wetlands protection measures such as turbidity barriers, berms, discharge water settling basins, and upland treated discharge will be implemented to minimize pipeline construction impacts. The technical document provided in response to USACE RAI #: EPA-10 discusses measures implemented to avoid or minimize impacts to wetlands that are adjacent to construction areas and pipelines. Trenching technology is applicable for all of the pipelines to be installed, including the onsite raw (fresh) water supply pipelines, makeup pipelines, and blowdown pipelines.

An additional evaluation of pipeline installation technology alternatives was conducted for the installation of the two 54-inch diameter high-density polyethylene (HDPE) pipes under the CFBC. The CFBC crossing distance is approximately 330 feet. Technologies evaluated for this pipeline segment include trenching, and several “trenchless” technologies such as HDD/auger boring, tunneling by jack and bore, ramming, and microtunneling. Other trenchless technologies such as impact moling are not applicable for this large size (54-inch diameter) pipe. Below is a summary of the assessment of technologies evaluated.

Aside from cost, technical aspects of the project that determine the applicability of specific methods include:

1. Site geology (sand vs. clay vs. rock, wet conditions, salt water conditions).
2. Physical impacts on surrounding land from equipment staging and use.
3. Environmental impacts (generation of waste cuttings to dewater, store, and dispose; turbidity generation in surface waters; noise pollution; land disturbance; dewatering impacts on wetlands, etc.).
4. Engineering limitations of the pipeline material (rigid vs. flexible steel, HDPE, ductile iron, corrosion resistance, physical strength, etc.).

Trenching – Below-grade pipeline installation by trenching will be required to maintain the navigability of the CFBC and to ensure that the pipeline is not subject to damage from shipping or potential future channel maintenance operations. The blowdown pipelines will be buried a minimum of 3 feet below the CFBC design bottom, with an average trench excavation depth of 10 feet below grade and a total trench excavation estimated width of 35 feet. The trenching will be conducted using trench boxes, dams, or sheet-piling and pumps and/or well points to isolate the work area and provide a suitably dry work environment. The State of Florida Conditions of Certification (COCs) (Section A. General Conditions XXVII A. 1 through 3, B. 1 through 9 and C. 1 and 2) require that controls be used to limit potential impacts to water quality and also that implementable measures be in place to protect aquatic wildlife. Sediment and water generated by dredging will be disposed of in an environmentally appropriate manner. Trenching will be conducted in segments to maintain navigability and to ensure the protection of protected species such as the Florida manatee. The LNP site COCs (Section C. Plant Specific Conditions III 7. a through f) require that all in-water construction be conducted in compliance with

Florida's Standard Manatee Conditions for In-Water Work (Florida Fish and Wildlife Conservation Commission [FWC], 2011). Sediment and water management plans associated with trenching in the CFBC are discussed in the attached Technical Memorandum (338884-TMEM-129) entitled *Evaluation and Management of Materials Dredged from the Cross Florida Barge Canal for the Construction of Barge Slip, Intake Structure, and Pipeline Facilities Associated with the Levy Nuclear Plant, Florida*. Excavated sediment will be stockpiled, dewatered, and beneficially reused to restore the site or as general fill during plant construction.

Pipe Ramming – This technology involves using a pneumatic hammer system to drive the pipe into the ground. The technology works best for shorter distances and shallower depths, and is not applicable for rocky conditions. This technology requires steel or concrete pipe, as it is physically driven to the end point and minimum collapse/crush strengths are above that of the HDPE pipe that will be used on this project. Pipe ramming also requires linear entry and exit pits, a minimum of 5 feet of cover, removal of spoils in pipe by jetting or augering, and is most effective in unconsolidated soils. This technology is not applicable to this project because pipe ramming is not effective in rock subsurface environments like that present at the project site.

HDD/Guided Boring –HDD uses a drilling rig with a steerable drill bit and drill rods to advance a subsurface pilot boring to the end point. A back reamer is then attached and pulled back through the boring to ream it to the final diameter. Borehole tracking is accomplished with a radio sonde contained within the drill bit housing. The pipe is then attached and pulled back through the boring to the start point. Limitations are that HDD is not as effective or feasible for pipe diameters greater than 48 inches, water heads above the boring should not exceed 3 vertical feet, and recirculating drilling air or foams are required to remove rock cuttings. A long linear laydown area is required for drilling and pulling the piping, and the length of boring runs decreases as pipe diameter increases. This technology has limited applicability for this project due to the added time/equipment needed for drilling in rock, water depths at the CFBC crossing, land requirements, and pipeline diameter limitations.

Pipe Jacking, Jack and Bore, Microtunneling – Pipe jacking or jack and bore installation uses a system of hydraulic jacks below grade to push sections of steel or concrete pipe into the subsurface. A cutting head can be run at the head of the pipe to remove soils or to cut rock. This method is applicable for installing pipes greater than 42 inches in diameter, as personnel are required inside the boring during construction to run the cutting head and remove spoil. Limitations of this technique include requiring a relatively straight boring alignment, personnel inside the boring to run the equipment and remove soils, installing the pipe into the jacking bore in sections using a crane, and launch and runout pits for the product pipe. Microtunneling is a variation of this technology which uses a remotely operated, laser-guided steerable tunneling head system with slurry cutting transport, eliminating the need for personnel in the boring and allowing tunneling in rock. Limitations of microtunneling include that the product pipe is installed inside the steel or concrete tunnel pipe; a staging and laydown area is required for the product pipe and the tunneling pipe; settling basins are required for the excavated slurry; and pits are required for product pipe installation. While potentially applicable for this project, pipe jacking technologies require impacts to large areas of land on both banks of the CFBC, and also generate additional spoil quantities.

The results of an analysis of pipeline installation technologies found that trenching was preferable to the tunneling technologies, ramming, or directional drilling for the installation of blowdown pipelines under the CFBC. Trenching is a proven technology that requires a smaller staging area footprint than either HDD or tunneling technologies. The latter technologies are also poorly suited to the type of geological matrix present in the area, are more costly, and, in the case of tunneling, generate additional waste materials that must be managed.

Reference: FWC. 2011 (latest edition). *Standard Manatee Conditions for In-Water Work*.

Attachment:

338884-TMEM-129, *Evaluation and Management of Materials Dredged from the Cross Florida Barge Canal for the Construction of Barge Slip, Intake Structure, and Pipeline Facilities Associated with the Levy Nuclear Plant, Florida*, Revision 2 (on attached CD)

USACE Letter No.: Corps Position Letter USACE-SAJ-2008-00490(IP-GAH)

USACE Letter Date: June 23, 2011

USACE RAI #: EPA-2

Text of USACE RAI:

Provide more specific information on the wetland functions and values that would be impacted at the non-preferred alternative site locations. It is difficult to determine the quality of wetland impacts associated with the alternative sites when a reasonable wetland functional analysis has not occurred.

Corps's Note: Subsequent to receipt of the EPA's comments to the DEIS, representatives of the EPA, NRC and the Corps met at the EPA's Atlanta offices on April 6, 2011 to discuss EPA's comments. The Corps agreed with the EPA that inclusion of an evaluation of the relative quality of wetlands among the alternative sites, as a review factor, should be included in the alternative sites analysis. The EPA agreed with the Corps that it would be satisfactory for PEF to use a combination of Florida Land Use, Cover, and Forms Classification System (FLUCCS) data with aerial photography as the basis of the evaluation. The EPA and the Corps also agreed that for purposes of the comparison of wetlands acreages among the alternative sites, that the use of FLUCCS data along with land use information, soil maps, and historical and current photography, as described in *Levy Nuclear Plant Units 1 and 2 (LNP) Section 404(b)(1) Alternatives Analysis, June 2010*, is acceptable.

PGN RAI ID #: L-0961

PGN Response to USACE RAI:

Progress Energy Florida (PEF) conducted an evaluation of wetland functions that would be impacted at the non-preferred alternative site locations and the LNP site, using FLUCCS data and other resources in accordance with protocols approved by the USACE and EPA. The results of the wetland functional evaluation are presented in 338884-TMEM-130.

The results showed that of the four alternative sites, the Highlands wetlands had the lowest relative functional ranking, followed (in order of increasing functional quality) by wetlands at LNP, Dixie 1, and Putnam 3. These results, when combined with the Least Environmentally Damaging Practicable Alternative (LEDPA) scores (as revised by the USACE), do not change the findings of the LNP site as the LEDPA. LNP is followed in the final LEDPA rankings by Dixie 1, Highlands, and finally Putnam 3.

Attachments:

338884-TMEM-130, *Functional Evaluation of Wetlands for the Alternative Sites, Levy Nuclear Plant, Florida*, Revision 1 (on attached CD)

USACE Letter No.: Corps Position Letter USACE-SAJ-2008-00490(IP-GAH)

USACE Letter Date: June 23, 2011

USACE RAI #: EPA-3

Text of USACE RAI:

The EPA requests that PEF submit a CFBC and Withlacoochee River Survey and Monitoring Plan to the EPA for review prior to initiation of formal monitoring. EPA may have specific monitoring recommendations and/or requirements.

Corps's Note: By cover letter dated February 15, 2011, NRC provided a copy of PEF's *Cross Florida Barge Canal and Withlacoochee River Survey and Monitoring Plan – Levy Nuclear Plant (November 2010)* to the EPA. The EPA may have subsequent comments after its review of this document, which may require additional correspondence and coordination amongst the EPA, NRC, PEF and the Corps.

PGN RAI ID #: L-0962

PGN Response to USACE RAI:

As noted by the USACE, the NRC has provided EPA with PEF's *Cross Florida Barge Canal and Withlacoochee River Survey and Monitoring Plan – Levy Nuclear Plant (November 2010)*. In accordance with the LNP site's Conditions of Certification, PEF negotiated this plan with the Florida Fish and Wildlife Conservation Commission and the State has determined that this plan fully meets the requirements of the State.

Attachments:

None.

USACE Letter No.: Corps Position Letter USACE-SAJ-2008-00490(IP-GAH)

USACE Letter Date: June 23, 2011

USACE RAI #: EPA-10

Text of USACE RAI:

The DEIS states temporary dewatering of wetlands may occur in order to install the blowdown pipelines and other structures over a 2 to 4 year period, but that *no* long-term effects on adjacent wetlands are anticipated. EPA recommends that a wetland functional analysis be conducted on the adjacent wetlands and any adverse wetland impacts that are identified due to dewatering be mitigated.

PGN RAI ID #: L-0963

PGN Response to USACE RAI:

Progress Energy Florida (PEF) has conducted functional analyses on wetlands that have potential to be affected by construction dewatering; however, no permanent impacts to these wetlands are expected from construction dewatering. PEF has also conducted groundwater modeling to evaluate the potential effects of construction dewatering on adjacent wetlands. Through the use of best management practices, and based on the results of groundwater modeling, groundwater levels in adjacent wetlands will recover after construction dewatering ceases. The period of groundwater drawdown is within normal seasonal variability for the wetlands. Groundwater monitoring infiltration trenches may be used to rehydrate adjacent wetlands during construction dewatering, further reducing the potential for adverse impacts.

Refer to 338884-TMEM-131 for a discussion of construction dewatering and wetlands.

Attachments:

338884-TMEM-131, *Effects of Temporary Dewatering on Wetlands for the Construction of the Levy Nuclear Plant, Levy County, Florida*, Revision 1 (on attached CD)

USACE Letter No.: Corps Position Letter USACE-SAJ-2008-00490(IP-GAH)

USACE Letter Date: June 23, 2011

USACE RAI #: LEDPA – CORPS #1

Text of USACE RAI:

Wetland Delineations among the Alternative Sites:

As stated in the Corps's June 17, 2010 letter to PEF, "On the Levy site there is a large difference between the areal extent of wetlands, as determined from ground-truthed wetland delineations, in comparison to the areal extent of wetlands, as determined by use of FLUCCS data. The difference is that almost 80% more wetlands have been delineated, than identified by FLUCCS on the Levy site ..... the alternative sites should be reviewed using other data, such as aerial photography and soils survey maps, along with FLUCCS data, in order to more accurately identify the extent of wetlands on the alternative sites in comparison with the Levy site. PEF should provide supporting information, which shows that the comparison of the areal extent of wetlands on all of the alternative sites is reasonable and defensible." As indicated above in the EPA comments, #2 on page 2, EPA and the Corps agreed that for purposes of the comparison of wetlands acreages among the alternative sites, that the use of FLUCCS data along with land use information, soil maps, and historical and current photography, as described in *Levy Nuclear Plant Units 1 and 2 (LNP) Section 404(b)(1) Alternatives Analysis, June 2010*, is acceptable. However, delineation of wetlands in compliance with the Corps's current wetland delineation manual and manual supplement is required for evaluation of minimization of wetland impacts on the site (including all ancillary components, such as the transmission line corridors) found to be the LEDPA. The Corps is working with PEF in finalizing approved wetland delineations associated with the LNP alternative.

PGN RAI ID #: L-0964

PGN Response to USACE RAI:

Progress Energy Florida (PEF) has received an approved wetland jurisdictional determination from the USACE and is anticipating a formal jurisdictional determination from the FDEP in late 2011 at the LNP site. As noted in the response to USACE RAI #: EPA-2, a functional evaluation of wetlands at the non-preferred alternative sites was conducted using FLUCCS data and other resources in accordance with the accepted USACE and EPA approach. The results of the wetland functional evaluation are presented in 338884-TMEM-130, and show the Highlands wetlands to have the lowest relative functional ranking, followed (in order of increasing functional quality) by wetlands at LNP, Dixie 1, and Putnam 3. When combined with the Least Environmentally Damaging Practicable Alternative (LEDPA) scores (as revised by the USACE), these results do not change the findings of LNP as the LEDPA. LNP is followed in the final LEDPA rankings by Dixie 1, Highlands, and finally Putnam 3.

Attachments:

338884-TMEM-130, *Functional Evaluation of Wetlands for the Alternative Sites, Levy Nuclear Plant, Florida*, Revision 1 (on attached CD)

USACE Letter No.: Corps Position Letter USACE-SAJ-2008-00490(IP-GAH)

USACE Letter Date: June 23, 2011

USACE RAI #: LEDPA – CORPS #3

Text of USACE RAI:

Alternative Sites Ranking Methodology:

The Corps does not support the use of quartiles in the ranking of the alternative sites for most of the specific criteria measured by quantifiable data, because quartiles can result in too large a range of impacts to be grouped together within any one level of ranking. The Corps supports the use of a decile ranking scale for specific criteria, which are evaluated using quantifiable data. The Corps can accept the use of quartiles for the ranking of the more subjective, qualitatively assessed specific criteria. The decile rankings can be adjusted, as will be demonstrated in the comments below, to use with the quartile rankings to determine the consolidated scores. Attached is a copy of Table 5.0-1 with Corps changes in regard to rankings, calculation of consolidated scores, and total scores (Enclosure 4).

PGN RAI ID #: L-0965

PGN Response to USACE RAI:

PEF has reviewed the rankings and scores revised by the USACE as presented in Table 5.0-1, and has no further comment**.**

Attachments:

None.

USACE Letter No.: Corps Position Letter USACE-SAJ-2008-00490(IP-GAH)

USACE Letter Date: June 23, 2011

USACE RAI #: LEDPA – CORPS #4

Text of USACE RAI:

On pages 11 through 20 of the Corps Position letter, the Corps provided comments in regard to review factors and specific criteria, as referenced and discussed in the *Revised Section 404 Alternatives Analysis*.

PGN RAI ID #: L-0966

PGN Response to USACE RAI:

Progress Energy Florida (PEF) has reviewed the USACE comments and has no further comment on the USACE adjustments and rankings.

Attachments:

None.