

PMTurkeyCOLPEm Resource

From: Williamson, Alicia
Sent: Wednesday, March 14, 2012 5:02 PM
To: Orthen, Richard
Cc: TurkeyCOL Resource; 'Bryce, Robert W'; Laurenson, James; Fringer, John; McInturff, Sandi M
Subject: Draft RAI 6350 regarding non-radiological health
Attachments: RAI 6350 draft.docx

Rick
Attached is the draft RAI on non-radiological health.
Let's have a call early next week to discuss.
Any question, let me know.
Thanx
Alicia

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Turkey Point Units 6 and 7
Florida P and L
Docket No. 52-040 and 52-041
SRP Section: EIS 5.8.1 - Etiological Agents
Application Section: ER 5.3.4

QUESTIONS for Environmental Projects Branch 1 (RAP1)

EIS 5.8.1-1

Provide the results of analyses of etiological agents in the water that will be used for cooling, including both the reclaimed water and the radial collector well water, and for the proposed and alternative sites, using pilot study or similar data.

Full Text: The FPL response to the original RAI (FPL Response to NRC RAI No. 5.8.1-3, RAI 5594, L-2011-158 Attachment 3, Letter #1103091, dated 4/25/11) notes that FPL has not conducted analyses of etiological agents in cooling water. FPL emphasizes that the additional treatment of the reclaimed water will reduce the presence of etiological agents. FPL, however, did not provide specifics on its planned treatment (e.g., the proposed reclaimed water treatment facility) or how that facility would be effective at treating etiological agents and to what levels. NRC notes that pilot treatment studies and/or analyses of other cooling water uses of the same source waters do exist (Miami-Dade Water and Sewer Department (MDWASD) pilot study referred to by FPL in "Site Certification Application; Plant and Associated Non-Transmission Facilities, 2nd Round Completeness Responses, Part B," July 2010, pdf p. 173) and the results are now available in the form of the Biscayne Bay Coastal Wetlands Rehydration Project (BBCWRP) Pilot Plant Closeout Report, September 2011. These studies could be used to provide an indication of the treatment train that FPL expects to implement with its associated constituent treatment targets, and thus an analysis of the etiological agents in the water that will be used for cooling.

EIS 5.8.1-2

Provide the correct citation for claims that microconstituents are not anticipated to be associated with any human health issues, or provide other evidence regarding whether and to what extent any human health impacts can be anticipated from the use of the reclaimed water.

Full Text: The FPL response to the original RAI (FPL Response to NRC RAI No. 5.8.1-3, RAI 5594, L-2011-158 Attachment 3, Letter #1103091, dated 4/25/11) provides qualitative statements to argue that etiologic and chemical agents in additionally treated reclaimed water will be safe for workers and the public. Regarding chemical agents, FPL states that "these microconstituents...are expected to be orders of magnitude less than concentrations that are needed for a therapeutic or pharmaceutical dose and, therefore, are not anticipated to be associated with any human health issues," citing FDEP, 2008 (Florida Department of Environmental Protection (FDEP), December 2008, Emerging Substances of Concern, Division of Environmental Assessment and Restoration,

Tallahassee, Florida). This conclusion, however, could not be found in this reference nor is the use of the therapeutic or pharmaceutical dose the appropriate test for human health issues.

DRAFT