



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE

Southeast Regional Office
263 13th Avenue South
St. Petersburg, Florida 33701-5505
(727) 824-5317; FAX (727) 824-5300
<http://sero.nmfs.noaa.gov/>

May 18, 2012

F/SER4:BH/pw

(Sent via Electronic Mail)

Andrew S. Imboden, Chief
Environmental Review and Guidance Update Branch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Mr. Imboden:

NOAA's National Marine Fisheries Service (NMFS) reviewed the Nuclear Regulatory Commission's (NRC) essential fish habitat (EFH) assessment dated March 20, 2012, for the proposed changes to reactor operations that would require discharging warmer water than currently occurs from St. Lucie Plant Units 1 and 2 (TAC No. ME5091) on Hutchinson Island, St. Lucie County, Florida. NRC's initial determination is the proposed changes to reactor operations would not adversely impact EFH or federally managed fishery species. As the nation's federal trustee for the conservation and management of marine, estuarine, and anadromous fishery resources, the following comments and recommendations are provided pursuant to authorities of the Fish and Wildlife Coordination Act and the Magnuson-Stevens Fishery Conservation and Management Act.

Project Description

The revised reactor operations would increase the temperature of cooling waters leaving the plant's two units yielding a maximum temperature of 119° F at the two discharge outfalls. This increase in temperature would require the addition of 6,896 cubic feet to the allowable mixing zone. The northern outfall pipe is 1,500 feet offshore, while the southern outfall is 1,900 feet offshore. Both outfalls lie in approximately 23 feet of water in areas devoid of corals and hardbottom.

Project Area Habitat and Fishery Species

While NMFS agrees with NRC's identifications of EFH present near the outfalls, NMFS believes Table 3 of the EFH assessment excludes species present in the project area that should have been included in Section 4 of the EFH assessment. These species are Spanish mackerel (*Scomberomorus maculatus*), cobia (*Rachycentron canadum*), king mackerel (*Scomberomorus cavalla*), and spiny lobster (*Panulirus argus*). However, NMFS does not believe this omission has changed the overall evaluation of the proposed changes to reactor operations.

Conclusion

NRC has received a National Pollution Discharge Elimination System (NPDES) permit from the Florida Department of Environmental Protection (FDEP) and an Industrial Wastewater Facility Permit from St. Lucie County. The proposed cooling water discharges would not exceed thresholds identified in those permits for water temperature at the edge of the allowed mixing zone. Florida Power and Light (FPL)



will conduct a baseline assessment prior to and during the upgrade to Unit 1. The assessment will study important fishery species and water quality parameters within the affected area. Post-operational monitoring will begin once Unit 2 is completed and will continue for two years. As a result of these studies, FDEP could require mitigation measures should unanticipated impacts occur.

Based on the above discussion of impacts likely to result from the proposed project, NMFS agrees with the NRC's determination that the proposed project would not have a substantial adverse impact on EFH.

We appreciate the opportunity to provide these comments. Questions should be directed to the attention of Mr. Brandon Howard in our West Palm Beach Field Office, which is co-located with the US Environmental Protection Agency at USEPA, 400 North Congress Avenue, Suite 120, West Palm Beach, FL 33401. He also may be reached by telephone at (561) 616-8880 extension 210, or by email at Brandon.Howard@noaa.gov.

Sincerely,



/ for

Virginia M. Fay
Assistant Regional Administrator
Habitat Conservation Division

cc:

NRC, Andy.Imboden@nrc.gov
NRC, Dennis.Logan@nrc.gov
F/SER4
F/SER47, Karazsia, Howard