



## SOUTH FLORIDA WATER MANAGEMENT DISTRICT

June 29, 2012

Alicia Williamson  
Environmental Project Manager  
United States Nuclear Regulatory Commission  
MS-T7E18  
11545 Rockville Pike  
Rockville, MD 20852

Dear Ms. Williamson:

**Subject: Florida Power and Light Combined License Application for Turkey Point Units 6 & 7 - Water Availability at Alternative Sites**

Thank you for meeting with the South Florida Water Management District (District) staff on June 6, 2012. We appreciate the opportunity to discuss the comments the District provided in its February 23, 2012 letter regarding water availability for the alternative sites proposed by Florida Power and Light (FPL) in the Combined License Application for Turkey Point Units 6 & 7.

To summarize our discussion, surface water availability from Lake Okeechobee for any of the proposed sites is limited by the District's Restricted Allocation Area rule. This rule was adopted in 2008 and applies to new uses within the Lake Okeechobee Basin. Specifically, this rule restricts use of water from Lake Okeechobee, and the surface waters hydraulically connected to Lake Okeechobee in the integrated conveyance systems, to those uses which have historically occurred, the base condition water use. In 2006, when FPL completed their alternative sites study, the District did not have specific criteria "capping" water availability from the Lake Okeechobee Basin. As presented in the 2006 alternative sites study, the consumptive uses proposed by FPL could potentially meet the water use regulatory criteria in place at the time.

It is important to note that, while surface and ground water availability for the three inland alternative sites may currently be limited, the Restricted Allocation Area rule allows for allocation of water to new projects through several, potential sources. One example discussed at our meeting was water supply made available through the termination of existing water rights. This could be accomplished by purchasing farmland currently served by Lake Okeechobee supplies, terminating the water use associated with the existing agricultural operations, and applying for an allocation to meet the consumptive use needs of the new power plant. In addition, alternative water supplies would be viable should any of the alternative sites be considered. Examples of alternative water supply sources include reclaimed water, storage of excess stormwater runoff in reservoirs, and deep saline aquifers. Should FPL choose any of these inland

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sites, there is a path forward for obtaining a reliable and sustainable source of water for cooling water. As discussed in our meeting, although terminating existing water rights and implementation of alternative sources may present engineering and regulatory challenges, there are mechanisms in place through the District's water use regulatory program for FPL to assemble the available, permittable surface and groundwater sources and meet the water needs of the power plant.

Thank you for forwarding the draft meeting summary notes and providing us with an opportunity to comment. The District's consumptive use regulatory structure is complex and, in many ways, reflects water resource considerations that are unique to our area. Florida's wet and dry seasons, flat topography, geologic formations, and flooding concerns combine to create an unusual regulatory framework that, in general, seeks to provide opportunities to sustainably use water from all available sources. We appreciate the opportunity to explain the details of this program and better enable the NRC to evaluate FPL's alternative sites. Please revise the summary to reflect the District's technical input and staff attendance.

If you have any questions concerning the above, please contact John Morgan, Lead Policy & Planning Analyst, at (561) 682-2288 or [jmorganj@sfwmd.gov](mailto:jmorganj@sfwmd.gov).

Sincerely,



Rod A. Braun, Director  
Office of Intergovernmental Programs  
South Florida Water Management District

c: Terrie Bates  
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