



DANIELLA LEVINE CAVA
MIAMI-DADE COUNTY COMMISSIONER
DISTRICT 8

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RULES AND DIRECTIVES
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USNRC

May 20, 2015

Mr. Mark Satorius, Executive Director for Operations
C/O Cindy Bladey
Office of Administration
Mail Stop: OWFN 12 H8
U.S. Nuclear Regulatory Commission
Washington, DC 20555

3/5/2015
80FR 12043

Re: Draft EIS for NRC-2009-0337

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Dear Mr. Satorius:

FPL has petitioned NRC to expand the nuclear power plant at Turkey Point. This location was chosen because of the existence of multiple power plants at the same site, including two currently operating nuclear reactors. The convenience and logistical advantages for this site are counterbalanced by the detrimental effect the existing plants are having on the ecology and water supply for Miami-Dade. This location is exceedingly vulnerable to sea level rise from climate change. Additionally, the operation of the existing reactors interferes with the National objectives of Everglades Restoration and further development of this site should incorporate the Federal projects intended to flood the land where the Turkey Point plants are located in order to restore Biscayne National Park's shoreline to estuary conditions.

The Nuclear Regulatory Commission draft Environmental Impact Statement needs to incorporate recent data showing the negative impact caused by the "uprate" for Turkey Point nuclear power units 3 & 4 into the final analysis. Miami-Dade environmental regulators have opined that the NRC approved increase in energy output and increased temperature for the cooling canals and are causing an acceleration of hypersaline conditions which is accelerating saltwater intrusion into Miami-Dade's drinking water aquifer.

Prior environmental impact statements conducted by the NRC indicated that the uprate project would have minimal environmental impact, yet just months after Florida Power and Light initiated the increased power output at the plants, the water temperature in the cooling canal system spiked to unacceptable levels. To mitigate the impact that the NRC had previously determined was not going to happen, FPL petitioned to draw up to 100 million gallons of water per day that would otherwise flow to Biscayne National Park in order to try to cool down the

SUNSE Review complete

E-RIDS = ADM-03

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overheated canals. According to the Miami Herald, in just 7 months, over one billion gallons of water had been diverted to the power plant during that emergency period. FPL has requested to continue this emergency draw from the South Florida Water Management District for another two years in an attempt to control the excessive temperature that continues to plague the existing system.

The NRC review should not separate the new reactor impacts from the persistent damage being caused by the existing reactor operations. The continued damage to Biscayne National Park must not be allowed to continue as it runs counter to the National Parks mission and the Nation's promise to its citizens that the Park and its biological resources be protected for current and future generations.

The NRC should, through the EIS process, identify opportunities to limit or remove environmental damage already being caused by the presence of Turkey Point 3 & 4. Clearly the 1960's "technology" of thousands of miles of cooling canals is no longer a pragmatic or functional solution to the demands of the existing power plants and has been shown to have significant deleterious impacts on the immediate environment and is damaging the ecological health of Biscayne National Park. Even if two years of water diverted from the National Park temporarily cools the Turkey Point canal system, it is evident that the hyper-saline conditions were present before the recent uprate and are largely responsible for accelerating salt water intrusion into the Biscayne Aquifer – Miami-Dade's only drinking water source. That same water source that is being impacted by Turkey Point 3 & 4 is the planned "backup" water for Units 6 & 7, further impacting the availability of fresh water flows to the National Park.

Not effectively addressing the ongoing environmental degradation as part of the NRC's environmental review of the proposed additional nuclear power plants would be a disservice to the residents of Miami-Dade County, the rate-payers of the State of Florida, and Nation. Please ensure that the environmental review for Turkey Point 6 & 7 evaluates the cumulative impact and use this opportunity to correct the problems as they exist now.

Sincerely,

A handwritten signature in cursive script that reads "Daniella Levine Cava".

Daniella Levine Cava
Miami-Dade County Commissioner,
District 8