## TurkeyPointCEm Resource

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**Sent:** Friday, July 17, 2015 2:16 PM

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Morton; Joanne Delaney - NOAA Affiliate

Subject: [External\_Sender] Submitted Comments for Docket ID-NRC-2009-0337; Turkey Point

Nuclear Plant

**Attachments:** FPL-TurkeyPoint FKNMS comments-7-17-17.pdf

Megan and Alicia~

Thank you for the opportunity to review and comment on the draft EIS for the Combined Licenses for Turkey Point Nuclear Power Plant Units 6 and 7.

Comments on behalf of Florida Keys National Marine Sanctuary have been uploaded to the <u>regulations.gov</u> site and are also attached here for your reference.

Regards, Beth

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**Federal Register Notice**: 80FR12043 **Comment Number**: 10474

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## UNITED STATES DEPARTMENT OF COMMERCE National Oceanic and Atmospheric Administration NATIONAL OCEAN SERVICE

Florida Keys National Marine Sanctuary 33 East Quay Road Key West, FL 33040

July 17, 2015

Memorandum for:

Colonel Alan Dodd, Commander

U.S. Army Corps of Engineers, Jacksonville District

Miami Permits Section

9900 Southwest 107th Avenue, Suite 203

Miami, Florida 33176

Jennifer Dixon-Herrity,

Chief U.S. Nuclear Regulatory Commission Division of New Nuclear Reactor Licensing

Mail Stop: TWFN 6C32 Washington, D.C. 20555-001

Attention:

Megan Clouser and Alicia Williamson

From:

Sean Morton

Superintendent

2. There year Morton Florida Keys National Marine Sanctuary

Subject:

Docket ID NRC-2009-0337: Combined Licenses (COLs) for Turkey Point

Nuclear Plant Units 6 and 7

Thank you for the opportunity to review and comment on the draft Environmental Impact Statement (EIS) for the Combined Licenses (COLs) for Turkey Point Nuclear Plant Units 6 and 7, dated February 2015, prepared by the Nuclear Regulatory Commission (NRC). This document describes plans by the Florida Power and Light Company (FPL) to build and operate two new 1,100- megawatt nuclear generating units referred to as Units 6 and 7 at the Turkey Point Nuclear Plant adjacent to Biscayne Bay in Miami-Dade County. While the project location falls outside the boundary of the Florida Keys National Marine Sanctuary (FKNMS), the southern portion of Turkey Point is adjacent to FKNMS and activities associated with this project could have adverse impacts on the resources of FKNMS. The following comments and additional information are provided pursuant to NOAA authority under the National Marine Sanctuaries Act (16 USC §1431 et seq.), Florida Keys National Marine Sanctuary and Protection Act (PL 101-605), and associated regulations (15 CFR 922 Subpart P).

The project components most relevant to FKNMS include the filling of 1,000 acres of wetlands for construction of the Units 6 and 7 and related infrastructure, the location and materials placed in Spoils Area B, and the impacts of building and operating radial collector wells. Impacts from these project components may include sediment and nutrient run-off and hypersaline and hyperthermal water quality conditions. These adverse impacts will most directly affect the aquatic resources and water quality of Biscayne Bay, Card Sound and vicinity; however,



there could be downstream impact on FKNMS resources. FKNMS regulations (15 CFR 922.163(a)(4)(ii)) prohibit discharging or depositing, from beyond the boundary of the Sanctuary, any material or other matter that subsequently enters the Sanctuary and injures a Sanctuary resource or quality. Therefore, FKNMS recommends reviewing these project components to ensure that impacts to aquatic resources and water quality are adequately addressed.

FKNMS concurs with National Marine Fisheries Service comments (submitted May 22, 2015) requesting development of a biological monitoring and adaptive management plan to assess ecological impacts of the project at construction, implementation, and operation phase to continue throughout the life of the project. FKNMS welcomes the opportunity to contribute to development of this plan and requests that results and outputs from any biological monitoring be shared with FKNMS. FKNMS conducts water quality monitoring and special studies through its long-standing Water Quality Protection Program (WQPP). Administered by the Florida Denartment of Environmental Protection and U.S. Environmental Protection Agency, the WQPP is a collaborative effort dedicated to protecting and improving water quality, coral reefs, seagrasses, fisheries and recreational opportunities within the FKNMS. The WQPP has supported and funded long-term research and monitoring programs that track water quality, coral reef and seagrass communities; results from monitoring and research studies have been instrumental in decision-making and in determining what actions are needed to sustain a healthy ecosystem. As such the WQPP could help inform the design of a water quality and biological monitoring program for this project that includes potential impacts to downstream aquatic ecosystems.

cc:

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