

# PUBLIC SUBMISSION

<b>As of:</b> 5/27/15 12:48 PM
<b>Received:</b> May 22, 2015
<b>Status:</b> Pending_Post
<b>Tracking No.</b> 1jz-8izx-weov
<b>Comments Due:</b> May 22, 2015
<b>Submission Type:</b> Web

**Docket:** NRC-2009-0337

Notice of Receipt and Availability of Application for a Combined License

**Comment On:** NRC-2009-0337-0020

Combined License Application for Turkey Point Nuclear Plant, Unit Nos. 6 and 7; Draft Environmental Impact Statement

**Document:** NRC-2009-0337-DRAFT-0205

Comment on FR Doc # 2015-05099

## Submitter Information

**Name:** Alfred Malefatto

**Address:**

515 North Flagler Drive  
Suite 1500

West Palm Beach, FL, 33401

**Email:** amalefatto@llw-law.com

**Submitter's Representative:** Alfred Malefatto, Esq.

**Organization:** Atlantic Civil, Inc.

*3/15/2015*  
*FR 12043*  
*210*

RECEIVED

2015 MAY 27 PM 1:04

RULES AND DIRECTIVES  
BRANCH  
USNRC

## General Comment

See attached file(s)

## Attachments

00503097

SUNSI Review Complete

Template = ADM - 013

E-RIDS= ADM-03 .

Add= *A. Williams (AEWI)*



Alfred J. Malefatto  
[amalefatto@llw-law.com](mailto:amalefatto@llw-law.com)

*Reply To:*  
*West Palm Beach Office*

**VIA ELECTRONIC AND REGULAR MAIL**

May 22, 2015

Ms. Cindy Bladey  
Office of Administration  
Mail Stop: OWFN 12 H8  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**RE: Atlantic Civil, Inc.  
Comments on Draft Environmental Impact Statement (“EIS”) for Combined  
Licenses (COLs) for Turkey Point Nuclear Plant Units 6 and 7**

Dear Ms. Bladey:

Our firm represents Atlantic Civil, Inc., (“ACI”) a property and business owner in close proximity to the Florida Power & Light Company’s (“FPL”) Turkey Point electric generating facility in Miami-Dade County, Florida. This letter provides ACI’s comments on the draft EIS for FPL’s application for issuance of COL’s for two new nuclear power reactor units (Units 6 & 7) at the Turkey Point facility.

1. Our principal concern is the ongoing westward migration of hypersaline groundwater through the aquifer in the vicinity of the Turkey Point facility. FPL should implement a plan to address the saline groundwater contamination emanating from its Cooling Canal System (“CCS”) at Turkey Point. Groundwater modelling can be very subjective due to uncertainty caused by limited model assumptions and characterization data. It is very important that the results from both the USGS and the FPL groundwater models be carefully analyzed to address the impacts of migration of hypersaline groundwater from the Turkey Point CCS.

---

*See Things Differently®*

TAMPA BAY  
101 Riverfront Boulevard  
Suite 620  
Bradenton, Florida 34205

p | 941-708-4040 • f | 941-708-4024

JACKSONVILLE  
245 Riverside Avenue  
Suite 150  
Jacksonville, Florida 32202

p | 904-353-6410 • f | 904-353-7619

TALLAHASSEE  
315 South Calhoun Street  
Suite 830  
Tallahassee, Florida 32301

p | 850-222-5702 • f | 850-224-9242

WEST PALM BEACH  
515 North Flagler Drive  
Suite 1500  
West Palm Beach, Florida 33401

p | 561-640-0820 • f | 561-640-8202

Ms. Cindy Bladey  
May 22, 2015  
Page 2

2. There is need for further hydrological studies to show how the increase in temperature from the Turkey Point facility will affect the plant's cooling system, as well as the adjacent surface and groundwater. In addition, proper reporting and evaluation of present and forecasted climatological changes and how they might affect the power plant operations is of critical importance.

ACI appreciates your consideration of the foregoing comments, and we look forward to the final EIS adequately addressing the issues raised.

Sincerely,



Alfred J. Malefatto