

# PUBLIC SUBMISSION

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**Docket:** NRC-2009-0337

Notice of Receipt and Availability of Application for a Combined License

**Comment On:** NRC-2009-0337-0092

Combined License Application for Turkey Point Nuclear Plant, Units 6 and 7; Reopening of Comment Period

**Document:** NRC-2009-0337-DRAFT-0267

Comment on FR Doc # 2015-12935

## Submitter Information

**Name:** Richard Orthen

*3/15/2015*  
*80 FR 12043*

## General Comment

Cindy K. Bladey, Chief  
 Rules, Announcements, and Directives Branch (RADB)  
 Division of Administrative Services  
 Office of Administration, Mail Stop OWFN-12-H08  
 U.S. Nuclear Regulatory Commission  
 Washington, D.C. 20555-0001  
 Re: Docket ID NRC-2009-0337 / NUREG-2176  
 Combined License Application for Turkey Point Nuclear Plant Unit Nos. 6 and 7  
 Draft Environmental Impact Statement Comments

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**References:**

1. NUREG-2176, Environmental Impact Statement for Combined Licenses (COLs) for Turkey Point Nuclear Plant Units 6 and 7; Draft Report for Comment, February 2015
2. Volume 80 Federal Register (FR) 1204312044 dated March 5, 2015, Combined License Application for Turkey Point Nuclear Plant, Unit Nos. 6 and 7, Draft Environmental Impact Statement; Request for Comment
3. Volume 80 FR 3050130502 dated May 28, 2015, Combined License Application for Turkey Point Nuclear Plant, Units 6 and 7, Draft Environmental Impact Statement; Request for Comment; Reopening of Comment Period

Dear Ms. Bladey:

Florida Power & Light Company (FPL) provides, as the attachment to this letter, its comments on the draft environmental impact statement (DEIS; Reference 1) for the proposed Turkey Point Units 6 & 7 COLs

*E-RTDS = ADM-013*  
*Cell = A. Williamson (ARWI)*

*SONSI Review Complete*  
*Template = ADM 013*

(Docket Nos. 52-040 and 52-041). These comments are provided in response to the DEIS being issued for public comment by the U. S. Nuclear Regulatory Commission (NRC) and the U. S. Army Corps of Engineers, Jacksonville District (References 2 and 3).

FPL appreciates the opportunity to review and provide comments on the DEIS to assist the Commission and U. S. Army Corps of Engineers in disclosing an accurate and complete evaluation of potential impacts in the final EIS (FEIS).

FPL recommends that the inconsistencies identified in the attached comments be reconciled in the FEIS. Many comments can be categorized as (1) significant overestimation of environmental impacts (such as the statement that FPL seeks approval to discharge fill into 1,000 acres of federal jurisdictional wetlands or describing impacts to the entirety of a pipeline or transmission corridor, when only a relatively narrow right-of-way would ultimately be affected), (2) minor discrepancies between values in the DEIS and the values in the cited references, and (3) overlooking updates to FPLs application documents, many of which result from binding Conditions of Certification recently imposed under the Florida Power Plant Siting Act process.

Given the NRCs delayed comment closing deadline of July 17, FPL hopes sufficient, timely resources are engaged to address all comments and maintain the NRCs Phase 3 milestone of February 2016 for publication of the FEIS, since publication of the FEIS is a prerequisite for permitting activities required before FPL can proceed with the project.

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## **Attachments**

L-2015-157 Dated 07-17-15 Docket ID NRC-2009-0337 NUREG-2176 DEIS Comments



L-2015-157

July 17, 2015

Cindy K. Bladey, Chief  
Rules, Announcements, and Directives Branch (RADB)  
Division of Administrative Services  
Office of Administration, Mail Stop OWFN-12-H08  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Re: Docket ID NRC-2009-0337 / NUREG-2176  
Combined License Application for Turkey Point Nuclear Plant Unit Nos. 6 and 7  
Draft Environmental Impact Statement Comments

References:

1. NUREG-2176, Environmental Impact Statement for Combined Licenses (COLs) for Turkey Point Nuclear Plant Units 6 and 7; Draft Report for Comment, February 2015
2. Volume 80 Federal Register (FR) 12043–12044 dated March 5, 2015, Combined License Application for Turkey Point Nuclear Plant, Unit Nos. 6 and 7, Draft Environmental Impact Statement; Request for Comment
3. Volume 80 FR 30501–30502 dated May 28, 2015, Combined License Application for Turkey Point Nuclear Plant, Units 6 and 7, Draft Environmental Impact Statement; Request for Comment; Reopening of Comment Period

Dear Ms. Bladey:

Florida Power & Light Company (FPL) provides, as the attachment to this letter, its comments on the draft environmental impact statement (DEIS; Reference 1) for the proposed Turkey Point Units 6 & 7 COLs (Docket Nos. 52-040 and 52-041). These comments are provided in response to the DEIS being issued for public comment by the U. S. Nuclear Regulatory Commission (NRC) and the U. S. Army Corps of Engineers, Jacksonville District (References 2 and 3).

FPL appreciates the opportunity to review and provide comments on the DEIS to assist the Commission and U. S. Army Corps of Engineers in disclosing an accurate and complete evaluation of potential impacts in the final EIS (FEIS).

FPL recommends that the inconsistencies identified in the attached comments be reconciled in the FEIS. Many comments can be categorized as (1) significant overestimation of environmental impacts (such as the statement that FPL seeks approval to discharge fill into 1,000 acres of federal jurisdictional wetlands or describing impacts to the entirety of a pipeline or transmission corridor, when only a relatively narrow right-of-way would ultimately be affected), (2) minor discrepancies between values in the DEIS and the values in the cited references, and (3) overlooking updates to FPL's application documents, many of which result from binding Conditions of Certification recently imposed under the Florida Power Plant Siting Act process.

Given the NRC's delayed comment closing deadline of July 17, FPL hopes sufficient, timely resources are engaged to address all comments and maintain the NRC's Phase 3 milestone of February 2016 for publication of the FEIS, since publication of the FEIS is a prerequisite for permitting activities required before FPL can proceed with the project.

If you have any questions, or need additional information, please contact me at 561-691-7490.

Sincerely,



William Maher  
Senior Licensing Director – New Nuclear Projects

WDM/RFO

Attachment: Docket ID NRC-2009-0337 / NUREG-2176 Turkey Point Nuclear Plant Unit  
Nos. 6 and 7 DEIS Comments

cc:

PTN 6 & 7 Project Manager, AP1000 Projects Branch 1, USNRC DNRL/NRO  
Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, Turkey Point Plant 3 & 4

Global

1. The DEIS on Pages 1-2 and 10-2 states that the “*applicant proposes to discharge fill material into approximately 1,000 acres of jurisdictional wetlands to construct the proposed project.*” The correct number for the direct wetland impacts for the project is 710 acres. This corrected information was supplied to the Corps in FPL’s May 7, 2010 letter to Paul Kruger modifying the federal dredge and fill permit application (FPLNNP-10-0151), as well as the July 2011 Turkey Point Units 6 & 7 Mitigation Plan Rev.2 and August 2012 Mitigation Plan Rev. 2 (USACE Supplement). As specified in the Table 1-1 of the Mitigation Plan Rev. 2 (USACE Supplement), the generating units and non-transmission facilities impact 402 wetland acres, while either of the transmission corridors is estimated to have no more than 308 acres of potential wetland impact thus totaling 710 acres of direct wetland impact.
2. There are a few instances in the DEIS text where the DEIS either states that Revision 6 of Florida Power & Light’s (FPL) Environmental Report (ER) (FPL 2014-TN4058) incorporated Revision 19 of the Westinghouse AP1000 Design Control Document (DCD) or that the FPL application refers to Revision 17 of the AP1000 reactor certified design. Revision 19 of the AP1000 DCD was incorporated as early as Revision 3 of the Units 6 & 7 COLA, DEIS reference (FPL 2011-TN127). Instances in the DEIS include:
  - a. DEIS Section 5.9, Page 5-97, Lines 36-41.
  - b. DEIS Section 5.11, Page 5-131, Lines 10-11.
3. In a letter dated March 17, 2014, DEIS reference (FPL 2014-TN3569), FPL removed the FPL-owned fill source from the application; however, there remain instances in the DEIS where the FPL-owned fill source is referenced. Instances in the DEIS include:
  - a. DEIS Subsection 2.7.2, Page 2-197, Line 11.
  - b. DEIS Subsection 4.3.1.3, Page 4-60, Line 22.
  - c. DEIS Subsection 4.5.1.1, Page 4-120, Line 30.
  - d. DEIS Subsection 4.8.1.1, Page 4-129, Lines 34-35.
  - e. DEIS Appendix F-2, Section 4.7, Page 4-6, Lines 3-4.
  - f. DEIS Appendix F-2, Section 4.8, Page 4-6, Lines 31-32.
  - g. DEIS Appendix F-3, Section 2.0, Page 2-1, Line 28.
  - h. DEIS Appendix F-3, Subsection 3.1.2, Page 3-7, Line 31.
4. In early 2015, FPL announced the change of the commercial operation dates (CODs) for Units 6 & 7 from 2022 and 2023 to 2027 and 2028, respectively. A

new and significant information review was conducted by FPL where it was concluded that there would not be an impact to any significance level or conclusion drawn in the ER with respect to the change in CODs. There are instances in the DEIS, however, where references to CODs differ from the newly announced CODs. Instances in the DEIS include:

- a. DEIS Subsection 4.4.3.1, Page 4-107, Lines 2-5: In DEIS Subsection 4.4.3.1, the commercial operations dates are mentioned in relation to economic analysis: "The impacts of building the proposed units on the local and regional economy...For this analysis, FPL assumed site preparation activities would begin in 2016 and commercial operation dates would be 2025 for Unit 6 and 2026 for Unit 7."
- b. DEIS Subsection 5.4.2, Page 5-66, Line 22: In DEIS Subsection 5.4.2, the commercial operations dates are mentioned in relation to demographic analysis: "For analytical purposes, Unit 6 is scheduled to start operation by 2025 and Unit 7 by 2026."
- c. DEIS Section 9.2, Page 9-3, Lines 4-12: In DEIS Section 9.2, the in-service dates, along with the impact of extending those dates, are mentioned: "The review team's analysis is based on an in-service date for Unit 6 of 2022 and Unit 7 of 2023 based on FPL's 2014 Ten-Year Plan (FPL 2014-TN3360). Even if the actual in-service date were to slip by a few years, the NRC staff would not expect such a change to affect the overall conclusions regarding energy alternatives for two reasons. First, the projections by FPL and by the U.S. Department of Energy, Energy Information Administration (DOE/EIA) that the NRC staff has used in its analyses do not change appreciably in the later years and are generally consistent with the data used for 2023. Second, the environmental impacts of the feasible alternatives are not likely to change appreciably, so the NRC staff's conclusions regarding environmental preferability are unlikely to change."
- d. DEIS Appendix I, Section I.2, Page I-2, Lines 32-42: In DEIS Appendix I.2, the DEIS states: "Florida Power and Light Company (FPL) has indicated that, if the COLs are granted, it expects to initiate commercial operations in the third quarter of 2022 and third quarter of 2023 for Units 6 and 7, respectively (FPL 2014-TN4058)... The review team considers use of GCRP impacts report projections for the 2071-2099 period under a continued increasing emissions scenario to be a conservative proxy for likely future conditions encompassing the licensing action, and for assessing the effects of climate change on the resource area impact levels presented in this EIS."

5. On December 11, 2014, the U.S. Fish and Wildlife Service published a final rule classifying the rufa subspecies of the red knot as threatened. A new and significant information review was conducted by FPL where it was concluded that there would not be an impact to any significance level or conclusion drawn in the ER with respect to the change in status of the rufa subspecies of the red knot.

With respect to this change of designation, there remain instances in the DEIS where it states that the red knot is **proposed** as a Federally threatened/endangered species (emphasis added):

- a. DEIS Subsection 2.4.1.3, Page 2-89, Lines 3-4: The DEIS states: "Red Knot (*Calidris canutus rufa*). The red knot is **proposed as a Federally threatened species** (78 FR 60024) (TN3199)."
- b. DEIS Subsection 2.4.1.3, Page 2-80, Table 2-13: DEIS Table 2-13 lists the "Rufa red knot" as "PT" (**Federally proposed threatened**).
- c. DEIS Subsection 9.3.2.3, Page 9-60, Table 9-8: DEIS Table 9-8 lists the "Federal Status" for the "Red knot" as "**Proposed Threatened**".
- d. DEIS Subsection 9.3.3.3, Page 9-115, Table 9-13: DEIS Table 9-13 lists the "Federal Status" for the "Red knot" as "**Proposed Threatened**".
- e. DEIS Subsection 9.3.4.3, Page 9-165, Table 9-18: DEIS Table 9-18 lists the "Federal Status" for the "Red knot" as "**Proposed Threatened**".
- f. DEIS Subsection 9.3.5.3, Page 9-211, Table 9-23: DEIS Table 9-23 lists the "Federal Status" for the "Red knot" as "**Proposed Endangered**".

There are, however, two instances in the DEIS that list the rufa red knot as threatened (emphasis added):

- a. DEIS Subsection 4.3.1.3, Page 4-55, Line 19: The DEIS states: "Red Knot (*Calidris canutus rufa*) – Threatened."
- b. DEIS Subsection 7.3.1.1, Page 7-20, Lines 10-13: The DEIS states: "Listed wildlife that could likely be affected by building proposed Units 6 and 7 facilities include the eastern indigo snake (threatened; *Drymarchon corais couperi*),...red knot (**threatened**; *Calidris canutus*),..."

Additionally, in two instances of the DEIS, the red knot is characterized as "not known to occur on the Turkey Point Property (emphasis added):

- a. DEIS Subsection 2.4.1.3, Page 2-89, Lines 4-18: The DEIS states: "As of 2008, the *rufa* subspecies is thought to have three biogeographically distinct populations, one of which winters in the Southeast United States including Georgia, South Carolina, and Florida (FWS 2013-TN3202)... **red knots**

**have not been observed and are not known to occur on the Turkey Point property** or along the Atlantic Coast of Miami-Dade County.”

- b. DEIS Subsection 4.3:1.3, Page 4-55, Lines 21-23: The DEIS states: “... **No record of red knots occurring on the Turkey Point** site has been found. However, suitable habitat exists on the site that would be affected by the proposed action...”

However, ER Table 2.4-1 lists the “Red knot” as being observed during the late winter 2009 avian surveys—one Red knot was observed.

The DEIS supports FPL’s conclusion that there would not be an impact to any significance level or conclusion drawn in the ER. Specifically, in DEIS Subsection 4.3.1.3, pages 4-55 (lines 30-31), and 4-65 (lines 18-19), and in DEIS Subsection 5.3.1.3, page 5-41 (lines 16-20), the NRC discusses its impact evaluation—in each instance the review team “expects that impacts would be minimal” in relation to the potential that the Red knot “could be expected to occasionally occur in small numbers at the Turkey Point site”.

6. There are instances in the DEIS where, due to the timing of events with respect to drafting the DEIS, specified dates, or future actions, indicated in the DEIS have passed. Instances in the DEIS include (emphasis added):
  - a. DEIS Section 4.6, Page 4-124, Lines 31-33 and DEIS Section 5.6, Page 5-82, Lines 2-3: The DEIS (Section 4.6) states: “(3) **if consultation with the Florida SHPO concluded with a finding of no historic properties affected...** (FDHR 2010-TN1455; FPL 2014-TN4058, Appendix 2.5A)...” Similarly, The DEIS (Section 5.6) states: “(4) **if consultation with the Florida SHPO concluded with a finding of no historic properties affected...**” However, as indicated in DEIS Section 4.6, ER Subsection 4.1.3.1, and ER Subsection 5.1.3, the work plan was submitted and Florida SHPO concurred. DEIS Section 4.6, page 4-123, lines 34-36 states: “The **Florida SHPO concurred** with FPL’s informal determination of “no historic properties affected” (Appendix 2.5A in FPL 2014-TN4058).” ER Subsection 4.1.3.1, states: “The survey identified no newly or previously recorded archaeological sites or historic resources...The Work Plan was submitted to **SHPO and concurrence** with the recommendation was received by FPL (FDOS Jul. 2009a).” And, ER Subsection 5.1.3, states: “Based on the findings contained in these two reports...no further surveys or investigations are warranted at the plant or associated non-linear facilities due to the lack of any cultural resources in these areas. The **SHPO has concurred** with these recommendations (FDOS Jul 2009a).”



- b. DEIS Subsection 7.11.2, Page 7-41, Lines 23-26: The DEIS states: "The Tunnel Access Improvement project is located about 26 mi northeast of the Turkey Point site, but it is unlikely construction of the two projects would overlap because the tunnel improvement project **is scheduled to be complete in 2014...**" This project **was completed in 2014.**
  - c. DEIS Appendix F-2, Section 1.0, Page 1-1, Lines 22-25: Appendix F-2 states: "A **proposed** Conditions of Certification dated **May 24, 2013**, was issued to FPL authorizing construction, operation, and maintenance of Turkey Point Units 6 and 7 and associated facilities subject to the requirements listed (FDEP 2013-TN2629)." On **May 19, 2014**, the Governor and Cabinet issued the Site Certification Order with the **final** Conditions of Certification (State of Florida 2014-TN3637).
  - d. DEIS Appendix F-2, Section 2.1, Page 2-4, Lines 11-12 and DEIS Appendix F-2 Subsection 3.1.3, Page 3-6, Lines 26-30: Appendix F-2 (Section 2.1) states: "FPL has proposed **an original location and an alternative location for the RWTF** and both are on the Turkey Point site." Similarly, USFWS (Section 3.1.3) states: "Land cover **at the alternate location** is mostly Australian pine established on upland spoil, canals, and ditches with some sawgrass marsh, dwarf mangroves, and Australian pine wetlands (FPL 2014-TN4058)." ER Section 3.9 "Preconstruction and Construction Activities", Figure 3.9-1 "Construction Utilization Plan", does not include the original location, only what used to be the called the "alternate" location.
  - e. DEIS Appendix F-2, Subsection 3.1.1, Page 3-4, Lines 29-31: Appendix F-2 states with regards to dredging in the turning basin for the equipment barge unloading area improvement: "**FPL would submit an application to USACE for a permit to dredge under the CWA, Section 404(b)(1) "Guidelines for Specification of Disposal Sites for Dredged or Fill Material" (40 CFR 230) (TN427), as described in ER Revision 6 (FPL 2014-TN4058)." The 404 permit application submitted to ACOE on June 30, 2009 includes dredging in the turning basin.**
  - f. DEIS Appendix F-2, Section 6.1, Page 6-2, Lines 10-11: Appendix F-2 states: "**Conversion of Units 1 and 2 to synchronous condenser mode would** reduce onsite vehicular traffic attributable to these two existing units." Unit 2 already operates in synchronous condenser mode as stated on Page 6-1, lines 19-20 of this document, which states: "In January 2013, **Unit 2 was converted to operate in synchronous condenser mode...**"
7. There are a few instances where the references to DEIS Appendix I (The Effect of Climate Change on the Evaluation of Environmental Impacts) and DEIS

Appendix J (Greenhouse Gas Footprint Estimates for a Reference 1,000 MW(E) Light-Water Reactor) appear to be reversed. Instances in the DEIS include:

- a. DEIS Subsection 6.1.3, Page 6-8, Lines 20-21.
- b. DEIS Section 6.3, Page 6-39, Lines 40-41.

Additionally, the title of Appendix J, "Carbon Dioxide Footprint Estimates for a 1,000 MW(e) Reference Reactor", listed in DEIS Subsection 1.6, page 1-12, line 27, is not consistent with the Table of Contents or Appendix J, "Greenhouse Gas Footprint Estimates for a Reference 1,000 MW(E) Light-Water Reactor".

8. There are instances in the DEIS where the reclaimed water pipeline is not correctly illustrated. Instances in the DEIS include:
  - a. DEIS Subsection 2.2.2.1, Page 2-16, Figure 2-5: DEIS Figure 2-5 contains the following inconsistencies:
    - i. A reclaimed water pipeline route is illustrated that does not take into account the width of the corridor for the northern section of the pipeline as it approaches the Miami-Dade County WASD. ER Figure 2.2-5 shows the pipeline corridor in this section to be 1 mile wide.
    - ii. The reclaimed water pipeline route is illustrated following the transmission line corridor as it approaches the Turkey Point site. ER Figure 2.2-3 shows the pipeline route following the L-31E canal south until it enters the RWTF.
  - b. DEIS Subsection 3.2.2, Page 3-7, Figure 3-4: DEIS Figure 3-4 has the reclaimed water pipeline exiting the Reclaimed Water Treatment Facility but also has a reclaimed water pipeline along 344th St. ER Figure 2.2-3 illustrates the current configuration of the reclaimed water pipeline route which does not include the routing along 344th Street.
  - c. DEIS Appendix F-3, Section 3.1.1, Page 3-4, Figure 3-3: Appendix F-3 Figure 3-3, illustrates the reclaimed water pipeline as it approaches the RWTF from the north and is not shown correctly. ER Figure 2.2-3 shows the pipeline following the L-31E canal south until it enters the RWTF.
9. There are instances in the DEIS where the DEIS characterizes the stormwater would be "discharged" into the industrial wastewater facility (IWF). FPL's ER uses the terms "routed" or "released" due to FPL's National Pollutant Discharge Elimination Permit. For example ER Subsection 3.6.3.2 states: "Stormwater would be **routed** to the industrial wastewater facility." Additionally, ER Subsection 4.2.1.1.3 states, "During construction, surface water runoff would be **released** to the industrial wastewater facility. Instances in the DEIS include (emphasis added):

- a. Appendix F-2, Section 2.1, Page 2-2, Lines 1-2: Appendix F-2: "Eventually, stormwater would be **discharged** into nearby canals of the existing industrial wastewater facility (IWF)."
  - b. DEIS Appendix F-3, Section 2.0, Page 2-1, Line 23: Appendix F-3 states: "Stormwater would then be collected and **discharged** into nearby cooling canals of the existing industrial wastewater facility (IWF)."
  - c. DEIS Appendix F-3, Subsection 4.1.1.2, Page 4-3, Lines 7-8: Appendix F-3 states "Water or effluent associated with RCW construction would be **discharged** into the IWF and not directly released into nearshore areas."
  - d. DEIS Appendix F-3, Subsection 4.1.1.2, Page 4-3, Lines 14-15: NFMS BA states, "This water, and other effluents or stormwater associated with construction activities, would be **discharged** into the IWF."
10. In Revision 1 of the "FPL Turkey Point Units 6 & 7 Threatened and Endangered Species Evaluation and Management Plan", DEIS reference, (FPL 2011-TN1283), FPL updated the plan to incorporate the final location of the Reclaimed Wastewater-Treatment Facility (RWTF), **revising the number of wildlife underpasses from 4 to 3**. There remain instances in the DEIS where the wildlife underpasses were not updated. Instances in the DEIS include (emphasis added):
- a. DEIS Subsection 4.3.2.1, Page 4-82, Lines 17-22: The DEIS states: "To mitigate the hazards associated with the increased traffic...FPL is proposing to install a system of **wildlife underpasses** to allow crocodiles to move safely under the primary access road...and associated freshwater ponds on the berms to the north, including the area known as the moat." As illustrated in DEIS Section 3.1, page 3-3, Figure 3-1, **the moat is the location of the RWTF**, underpasses are no longer proposed at that location.
  - b. DEIS Subsection 4.3.2.3, Page 4-94, Lines 13-16 and DEIS Subsection 4.3.2.5, Page 4-98, Lines 23-26: The DEIS (Subsection 4.3.2.3) states: "As described in its **2009** Threatened and Endangered Species Evaluation and Management Plan, FPL has proposed to install **three wildlife** underpasses on the road between the northern end of the IWF and **test canals to the west of the IWF** to mitigate collision hazards (FPL 2010-TN170)." Similarly, the DEIS states (4.3.2.5): "To mitigate hazards related to vehicle collision, FPL...proposed a series of wildlife underpasses on the road between the northern end of the IWF and **test canals to the west of the IWF** (FPL 2014-TN4058; FPL 2010-TN170)." Additionally, with respect to the location of the test canals, ER Subsection 4.3.1.1.4 states: "The FPL reclaimed water

treatment facility would be built on a parcel by the **test canals...(immediately north of the industrial wastewater facility).**"

11. The DEIS text refers to the "**9,640 ac** Turkey Point site". The reference listed in the DEIS is FPL 2014-TN4058, FPL's ER. The ER text denotes this same area as the "approximately **9400-ac** Turkey Point plant property". (emphasis added)  
Instances in the DEIS include:

- a. DEIS Section 1.0, Page 1-1, Line 12.
- b. DEIS Section 2.1, Page 2-1, Line 23.
- c. DEIS Section 3.1, Page 3-1, Line 30.
- d. DEIS Section 10.0, Page 10-1, Line 12.
- e. DEIS Appendix F-3, Section 1.0, Page 1-2, Line 10.

References to the approximate **9400-ac** Turkey Point plant property in the ER include (emphasis added):

- a. ER Subsection 1.1.2.2.
- b. ER Section 2.1.
- c. ER Subsection 2.2.1.1.1.
- d. ER Table 2.2-1 which lists **9459.94** acres as total land for Turkey Point Property.

12. There are instances in the DEIS where a reference is either incorrectly cited, corrupt in ADAMS, or not consistent with the information referenced. Instances in the DEIS include:
- a. DEIS Subsection 2.6.1.2, Page 2-186, Table 2-54: DEIS Table 2-54 lists the source as (USCB 2009-TN1462). The file in ADAMS, Accession No. ML14287A731, for the DEIS reference (USCB 2009-TN1462) is corrupt.
  - b. DEIS Subsection 6.2.2, Page 6-27, Lines 15-16: The DEIS references Addendum 1 to NUREG-1437 as the 2013 Revision 1 of the GEIS (NRC 2013-TN2654). The correct reference for Addendum 1 of the GEIS is DEIS reference (NRC 1999-TN289).
  - c. DEIS Subsection 8.1.1, Page 8-2, Line 37: The DEIS cites "(TenYrPlan2014)" as the reference. The reference should be cited as (FPL 2014-TN3360).
  - d. DEIS Subsection 10.6.1.2, Page 10-20, Line 31: The DEIS references Section 5.4.3.1 for additional information about the economic impacts of constructing and operating Units 6 & 7. DEIS Section 5.4.3.1 references FPL 2011-TN435 which is "Personal Communications with Miccosukee Tribe of Indians of Florida, Metro Miami Action Plan Trust and Miami-Dade Office of Community Advocacy." The reference should be a U.S. Bureau of

Economic Analysis reference: BEA 2012-TN1569; BEA 2012-TN4074; or BEA 2014-TN4075.

- e. DEIS Subsection 11.0, Page 11-43, Lines 36-37: The DEIS reference cited, (FPL 2011-TN303), refers to FPL's "Stormwater Management Plan and Calculations" with an Accession No. ML12192A226. This Accession No. is linked to a SANDIA National Laboratories document, "RADCAT 2.3 User Guide" in ADAMS.
  - f. DEIS Appendix F-2, Section 2.1, Page 2-4/2-5, Line 43/2: Appendix F-2 states: "A new substation...would also be necessary (**Error! Reference source not found.** Figure 2-3)."
  - g. DEIS Appendix F-2, Section 4.10, Page 4-7, Lines 27-28: Appendix F-2 states: "As discussed in FPL's Ten-Year Power Plant Site Plan (FPL 2013-TN2630), population estimates...1,000 to 2,000 individuals." The reference cited, (FPL 2013-TN2630), is FPL's Ten Year Power Plant Site Plan 2013-2022. This document does not provide information about crocodile populations. The correct reference is the FPL Threatened & Endangered Species Management Plan, Rev 1 (FPL 2011-TN1283). Page 12, paragraph 3, which states, "Ogden (1978a) estimated that between 1,000 and 2,000 American crocodiles existed in south Florida in the early 20<sup>th</sup> century..."
  - h. DEIS Appendix F-2, Subsection 5.10.5, Page 5-9, Lines 31-34: Appendix F-2 states: "The 2014 death involved an adult crocodile...not attributed to plant operations (NRC 2014-TN3718)." The reference listed could not be verified. The DEIS reference cited (NRC 2014-TN3718) refers to NRC's Event Notification Report: Offsite Notification due to Deceased American Crocodile, July 25, 2014 with an accession No. ML14338A556. This Accession No. is linked to the Appendix F-2 . (emphasis added)
13. There are instances in the DEIS where the impacts are characterized as affecting an entire transmission or pipeline corridor, when in reality, only a small percentage of the corridor will be impacted. Instances in the DEIS include (emphasis added):
- a. DEIS Subsection 2.4.1.2, Page 2-79, Lines 10-13: The DEIS states: "Access near the L-31 Canal **would occur** over or through dikes, levees, and canals **as well as 5 ac of wetlands**. An access road near NW 88th Street **would occupy...**" Acreages presented in the ER, along with the corresponding documents, are on a corridor basis; the actual area disturbed will be less than the total within the corridor.
  - b. DEIS Subsection 4.3.1.2, Page 4-45, Lines 3-4: The DEIS states: "Land cover that **would be affected** by installation of the pipeline totals

approximately 326 ac (Table 4-3)...” All acreage within potable water pipeline corridor is identified as “affected area”, when actually only a small percentage of the corridor will be used to install the pipeline.

- c. DEIS Subsection 4.3.1.2, Page 4-45, Lines 15-17: The DEIS states: “Approximately **1,886 ac** of upland, forested, and wetland habitats...**would be affected** by installation of the reclaimed water pipeline (Table 4-3).” Only small percentage of total will actually be temporarily impacted during pipeline installation.
- d. DEIS Subsection 4.3.1.2, Page 4-50, Lines 7-16: The DEIS states: “Combined, the two new access roads for the West Preferred corridor **would affect 365 ac** (Table 4-6). The Krome Avenue access road **would result in** habitat loss or alteration...The four access roads necessary for the West Consensus corridor **would affect** a combined **110 ac**...A variety of wetlands **would be lost**...” Corridors are wider than necessary to allow for impact avoidance during final roadway alignment design. Only a small percentage of habitats within the corridor would be affected.
- e. DEIS Subsection 4.3.1.3, Page 4-68, Lines 21-23: The DEIS states: “The proposed reclaimed water pipeline **would affect** almost **450 ac** of wetlands, including...” The DEIS is presenting all acreage within a corridor (from DEIS Table 4-3) as impact area, when only a small percentage of the corridor would be affected. For comparison, from DEIS reference (FPL2011-TN1012)—Turkey Point Units 6 & 7 Mitigation Plan, the total acreage of temporary wetland impact associated with reclaimed water pipeline is **43.6 ac**.
- f. DEIS Subsection 4.3.1.7, Page 4-72, Lines 29-31: The DEIS states: “Pipelines that would be built...**would affect an additional area of approximately 2,211 ac**...” Corridors are wider than necessary to allow for impact avoidance during final design. Only a small percentage of habitats within the corridor would be affected.
- g. DEIS Subsection 7.3.1.1, Page 7-19, Lines 31-33: The DEIS states: “An additional **2,203 ac** of terrestrial habitats **would be affected** by the installation of potable and reclaimed water-supply systems...” FPL’s response to NRC RAI Letter No. 1103093 (eRAI 5561), ML11192A042, dated July 7, 2011 states: “The land disturbance for each type of vicinity and region linear feature - transmission, pipeline, road - represents a corridor in which each feature will be located. The actual land disturbance for each feature are expected to be less, based on the requirements of that feature... Additionally, the pipeline disturbances are considered temporary.

That is, the land disturbance will be restored to its original land use upon completion of construction/installation activities."

- h. DEIS Appendix F-2, Subsection 3.1.2, Page 3-6, Lines 3-4 and DEIS Appendix F-2, Subsection 3.1.2, Page 3-6, Lines 11-12: Appendix F-2 (lines 3-4) states: "Development of the East corridor would disturb approximately 1,635 ac of land." Appendix F-2 (lines 11-12) also states: "The route referred to as the "West Preferred corridor" occupies approximately 3,280 ac of land." This information does not take into account that the acreage listed is for a corridor, not the final right of way. The corridor will not be developed; the ROW within the corridor will be developed (ER Subsection 4.3.2.4). In addition in some locations the new facilities will be co-located with existing facilities (ER Subsection 2.2.2.2). ER Subsection 4.3.2.4 states: "The western and eastern transmission corridors represent the maximum extent of land presented for certification as part of the Site Certification Application (SCA) state process. The actual required right-of-ways will be determined post-certification, as will the location and amount of actual land requirements/disturbances necessary for transmission line construction. Therefore, the end-use land cover for these transmission corridors cannot be determined at this time." ER Subsection 2.2.2.2 states: "The Clear Sky-Davis portion of the East Preferred Corridor would use an existing, 19-mile-long, multicircuit FPL transmission line right-of-way. This right-of-way has the ability to accommodate the proposed single-circuit 230 kV line without the need for additional right-of-way. However, for a portion of the Davis to Miami corridor, new rights-of-way would be required, but much of the proposed corridor includes existing transportation rights-of-way (e.g., U.S. Route 1, Metrorail)" and "In some portions of the proposed Davis-Miami transmission line section, it would be collocated with other transmission lines on the existing right-of-way."
- i. DEIS Appendix F-2, Subsection 3.1.4, Page 3-6/3-7, Lines 40/2: Appendix F-2 states, with regard to the potable pipeline corridor: "...for the purposes of this BA, it is assumed the entire corridor would be disturbed. More than 184 ac of wetlands would be disturbed." The DEIS is presenting all acreage within the corridor as impact area, when only a small percentage of the corridor would be affected. COLA Rev 6 section 4.1.2.4 states, "Because of the commonality of the (potable) pipeline route with previous disturbance and/or new disturbance already expected to occur resulting from construction of other Units 6 & 7 project facilities (e.g., roadway improvements), construction of the underground pipelines would have minimal additional environmental impacts." In addition, the language does

not state that these are temporary impacts. ER Subsection 4.1.2.4 states: "As described in Section 4.3,...and, **upon completion, the disturbed portions of the corridor would be graded to the contours of the surrounding landscape and revegetated or returned to previous land uses.**"

- j. DEIS Appendix F-2, Section 5.1, Page 5-1, Lines 5-8: Appendix F-2 states: "Development of lands within the Turkey Point site, including...**would result in the removal of more than 1,300 trees, including almost 550 trees of various palm species** (FPL 2011-TN1471)." Condition of Certification, Section B "Specific Conditions – Power Plant and Associated Facilities (Excluding Transmission Lines)", Subsection VII "Miami-Dade County", Item O. 13, page 89 states: "Prior to commencement of work within each segment of linear facilities (roads or pipelines), FPL shall revise the tree survey previously submitted in response to MDC completeness question 5-MDC-D-11 (July 2011). The revised tree survey will show all upland trees proposed to be removed, as well as a tree planting plan to mitigate for the tree canopy to be removed as required by Section 24-49 of Miami-Dade County Code." The tree survey was a baseline conducted to identify existing trees per MDC requirements. It does not indicate what trees would be removed.

14. There are instances in the DEIS with respect to the presented land use values in their respective tables, which are inconsistent with the cited source or not current with the most recent documentation/reference. Instances in the DEIS include (emphasis added):

- a. DEIS Subsection 2.2.2.1, Page 2-15, Table 2-4: In DEIS Table 2-4 contains acreages for the existing and proposed transmission corridors. The following inconsistencies are noted with the cited source for DEIS Table 2-4, (FPL 2014-TN4058) (areas where the data is inconsistent with the most current reference are also indicated):
- i. Information for the West Secondary Corridor is included, while information for the West Consensus Corridor is not included. The West Secondary Corridor was removed from consideration in 2013 at the time the West Consensus Corridor was adopted. [DEIS Reference (FPL 2013-TN2941)].
  - ii. The acreage for the proposed "Clear Sky-Levee Leg 1"/ "Clear Sky-Pennsuco Leg 1" is listed as **1378.9**. ER Table 2.2-3 and DEIS Table 2-5 lists the total acreage, **1365.43**, for the same route. (Note the total acreages for mentioned corridors are accordingly inconsistent.)



- iii. The total length of the "Clear Sky-Levee" is listed as **44** miles. ER Subsection 2.2.2.2 lists the total length as **43** miles.
  - iv. The intermediary lengths for the co-located legs of "Clear Sky-Levee" and "Clear Sky –Pennsuco" is listed as 27.5, 13, and 4.5 for Leg 1, Leg 2, and Leg 3, respectively, and gives the total of these three legs as **44**. ER Subsection 2.2.2.2 lists the total length as **43** miles and no intermediary lengths are provided in the ER.
- b. DEIS Subsection 2.2.2.1, Page 2-18, Table 2-5: In DEIS Table 2-5 contains total acres of transmission line corridors and access roads by major FLUCFCS code. The following inconsistencies are noted with the cited sources for DEIS Table 2-5, [(FPL 2014-TN4058) and (FPL 2013-TN2941)]:
- i. Listed under "West Consensus Access Roads" are 11 different segments. As stated in DEIS Section 2.2.2.1, Transmission-Line Corridors, and DEIS reference (FPL 2013-TN2941), only four proposed access road corridors for the West Consensus corridor have been designated: NW 12th Street, Tamiami Trail, L-31 Canal and Levee, and SW 88th Street.
  - ii. The acreage listed for FLUCFCS code 600 under "West Consensus Access Corridor", segment for the L-31 Canal is **4.2 ac**. DEIS reference (FPL 2013-TN2941) Table 1 lists this entry as **4.7 ac**.
  - iii. The presented summation of the acreage for FLUCFCS code 800 listed for both the "West Preferred Corridor" and "West Consensus Corridor", segments for the Levee to Pennsuco is **24.8 ac**. ER Table 2.2-3 provides the individual acreage by FLUCS code subcategory. For code 800, under the Levee to Pennsuco route, the sum is **34.8 ac**.
- c. DEIS Subsection 2.2.2.3, Page 2-20, Table 2-6: DEIS Table 2-6 contains total acres of reclaimed water pipeline and the potable water pipeline by major FLUCFCS land-use categories. The following inconsistencies are noted with the source cited for DEIS Table 2-6, (FPL 2014-TN4058):
- i. Four of the values for the reclaimed water pipeline are inconsistent with the ER. DEIS Table 2-6 for codes 200, 500, 600, and 800 lists 496.64, 74.89, 447.80, and 672.05, respectively, while the summation of the values listed on ER Table 2.2-6 for codes 200, 500, 600, and 800 are 496.65, 78.06, 457.75, and 669.29, respectively.
  - ii. Four of the values for the potable water pipeline are inconsistent with the ER. DEIS Table 2-6 for codes 400, 500, 600, and 800 lists 7.69, 24.75, 159.95, and 39.21, respectively, while the summation of the values listed on ER Table 2.2-6 for codes 400, 500, 600, and 800 are 7.65, 24.72, 158.95, and 39.19, respectively.

- d. DEIS Subsection 2.2.3, Page 2-23, Table 2-7: DEIS Table 2-7 reports the acres within the 50 mile region using FLUCFCS. The following inconsistency is noted with the source cited for DEIS Table 2-7 (FPL 2014-TN4058):
  - i. Two of the values, for codes 600 and 800, listed as **1,409,912** and **42,570**, respectively, are inconsistent with ER Table 2.2-8. The summation provided in ER Table 2.2-8 for codes 600 and 800, are **1,416,931** and **42,588**, respectively.
- e. DEIS Subsection 2.4.1.2, Page 2-78, Table 2-12: DEIS Table 2-12 contains the land use coverage acreages for the pipeline corridors by classification. The following inconsistencies are noted with the source cited for DEIS Table 2-12, (FPL 2014-TN4058, Table 2.2-6) (areas where the data is inconsistent with the most current reference are also indicated):
  - i. The "Potable Water Pipeline Corridor" acreages for the "Forest (ac)", "Open Water (ac)", "Wetlands (ac)", and "Infrastructure (ac)" classifications are consistent with an earlier revision of FPL's ER but are inconsistent with FPL's ER Revision 6. The acreages listed in DEIS Table 2-12 for the "Forest (ac)", "Open Water (ac)", "Wetlands (ac)", and "Infrastructure (ac)" classifications are 7.69, 24.75, 159.95, and 39.21, respectively. In contrast, the summation of the acreages in ER Table 2.2-6, Revision 6, for the same major classifications are 7.65, 24.72, 158.95, and 39.19, respectively.
  - ii. The "Reclaimed Water Pipeline Corridor" acreages for the "Uplands (ac)" and "Wetlands (ac)" classifications are inconsistent with ER Revision 6. The acreages listed in DEIS Table 2-12 for the "Uplands (ac)" and "Wetlands (ac)" classifications are 101.34 and 457.8, respectively. In contrast, the summation of the acreages in ER Table 2.2-6, Revision 6, for the same major classifications are 99.28 and 457.75, respectively.
  - iii. For both the "Potable Water Pipeline Corridor" and "Reclaimed Water Pipeline Corridor" the acreage for the "Developed (ac)" classification is not consistent with ER Revision 6. The acreages listed in DEIS Table 2-12 for the "Developed (ac)" classification are 58.9 and 720.7 for the "Potable Water Pipeline Corridor" and "Reclaimed Water Pipeline Corridor", respectively. In contrast, the summation of the acreages in ER Table 2.2-6, Revision 6, for the "Developed (ac)" classification are 51.36 and 19.67 for the "Potable Water Pipeline Corridor" and "Reclaimed Water Pipeline Corridor", respectively.

- iv. For both the "Potable Water Pipeline Corridor" and "Reclaimed Water Pipeline Corridor" the summation of the acreages do not equate to the values listed under the "Total Acres" in DEIS Table 2-12. Additionally, for the "Potable Water Pipeline Corridor", the value listed for the "Total Acres" is not consistent with ER Revision 6.
- f. DEIS Subsection 4.1.1.1, Pages 4-5 and 4-6, Table 4-1: DEIS Table 4-1 reports the disturbed area acreage for the Turkey Point Site. The following acreage values do not reflect the values in ER Table 4.3-1 Revision 6, but rather reflects those of ER Table 4.3-1 Revision 4 prior to the relocation of the FPL Reclaimed Wastewater-Treatment Facility:
  - i. The following "FPL Reclaimed Wastewater-Treatment Facility" FLUCFCS codes and associated acreages are reported (612B: 42.82 acres; 617: 0.78 acres; and 814: 0.31 acres). ER Table 4.3-1, Revision 6, reports the same facility with FLUCFCS codes and associated acreages as (437: 7.79 acres; 510: 3.07 acres; 511: 0.30 acres; 612-B: 19.80 acres; 619: 0.61 acres; 619-AP: 0.16 acres; 6411: 11.93 acres; and 814: 0.26 acres).
  - ii. Additionally, FLUCFCS land-use codes and acreages are reported in DEIS Table 4-1 for disturbed areas for the "Treated Reclaimed Delivery Pipelines" category. Per note in ER Table 4.3-1, Revision 6: "The treated reclaimed water supply pipeline is now fully within the heavy haul road disturbed area and is not separately considered".
- g. DEIS Subsection 4.1.1.1, Page 4-7, Table 4-2: DEIS Table 4-2 contains acreages for the project elements by major FLUCFCS codes. The following inconsistencies with the cited source, DEIS Table 4-1, and/or the corresponding source for DEIS Table 4-1, ER Table 4.3-1, are noted:
  - i. The "Heavy Haul Roads" project element, under code 500, 0.30 acres is listed; and under code 700, 0.21 acres is listed. DEIS Table 4-1 and ER Table 4.3-1 both report 0.15 acres under code 500. The summed values for code 700 listed in both DEIS Table 4-1 and ER Table 4.3-1 is 0.22 acres for the same project element.
  - ii. The "Equipment Barge-Unloading Area" project element, under code 600, 0.73 acres is listed. Both DEIS Table 4-1 and ER Table 4.3-1 reports this acreage under code 800 not 600.
  - iii. The "Radial Collector Well Delivery Pipeline" project element does not have acreage listed under code 700, while both DEIS Table 4-1 and ER Table 4.3-1, report 9.21 acres under code 700 for the same project element.

- iv. The acreages for the “FPL Reclaimed Wastewater Treatment Facility” and “Treated Wastewater Delivery Pipelines” project elements do not reflect the revised location of the FPL Reclaimed Water Treatment Facility detailed in ER Table 4.3-1, Revision 6.
- h. DEIS Subsection 4.1.1.3, Pages 4-10 and 4-11, Table 4-3: DEIS Table 4-3 contains acreage values by FLUCFCS codes for the reclaimed water and potable water pipelines. The following inconsistencies are noted with the source cited for DEIS Table 4-3, (FPL 2014-TN4058):
  - i. The acreages for the “Reclaimed Wastewater Pipeline” do not reflect the revised location of the FPL Reclaimed Water Treatment Facility detailed in ER Table 4.3-1, Revision 6, but rather reflect those of the initial location with the acreages and percentages matching ER Table 4.3-1, Revision 4.
  - ii. The acreages for the “Potable Water Pipeline” do not reflect the values in ER Table 4.3-1 Revision 6, but rather reflects those of ER Table 4.3-1 Revision 4.
- i. DEIS Subsection 4.1.1.3, Pages 4-12 and 4-13, Table 4-4: DEIS Table 4-4 reports acreage values by FLUCFCS codes for the access roads. The following inconsistency is noted with the source cited for DEIS Table 4-4, (FPL 2014-TN4058):
  - i. For “SW 359<sup>th</sup> Ave. East”, DEIS Table 4-4 does not list FLUCFCS code 534 “Reservoirs Less Than 10 Acres (4 Hectares) Which Are Dominant Features” and its corresponding acreage and percent total. However, ER Revision 6 Table 2.2-7, lists FLUCFCS code 534, under the “SW 359<sup>th</sup> Ave. East” area with a corresponding acreage and percent total of 0.06 and 0.13, respectively.
- j. DEIS Subsection 4.1.2.1, Page 4-16 through 4-19, Table 4-5: DEIS Table 4-5 contains acreages for the transmission line routes by FLUCFCS codes. The following inconsistencies with the source cited in the text for DEIS Table 4-5, (FPL 2014-TN4058) are noted:
  - i. DEIS Table 4-5 contains information listed as “Clear Sky to Levee 2<sup>nd</sup> Leg (Consensus Corridor).” From ER Table 2.2-3, these acreages are actually acreages from “Clear Sky to Levee 2<sup>nd</sup> Leg (Secondary Corridor).” The West Secondary Corridor was removed from consideration in 2013. [DEIS Reference (FPL 2013-TN2941)]. Acreages should be provided for the West Consensus Corridor, which are found in DEIS reference (FPL2013-TN2941).
  - ii. DEIS Table 4-5 lists the total acres for the proposed Clear Sky to Levee 1<sup>st</sup> Leg as **1378.9**. ER Table 2.2-3 and DEIS Table 2-5 list the

- correct total acreage, **1365.43**, for the same route. Seven of the values for the Clear Sky to Levee 1<sup>st</sup> Leg are inconsistent with the ER, which is cited as the reference. DEIS Table 4-5 for codes 437, 510, 511, 612-B, 619, 6411, and 814 lists 0.84, 219.01, 0.92, 73.16, 57.07, 11.47 and 12.27 respectively, while the values listed on ER Table 2.2-3 for codes 437, 510, 511, 612-B, 619, 6411, and 814 are 0.08, 218.11, 0.67, 63.96, 56.46, 9.97, and 12.03, respectively. (emphasis added)
    - iii. DEIS Table 4-5 contains information listed as “Clear Sky to Levee 2<sup>nd</sup> Leg (Preferred Option). There is one category missing—category 619, Exotic Wetlands Hardwood, which should be listed with an acreage value of 74.62 acres.[ ER Table 2.2-3, DEIS reference (FPL2014-TN4058)].
    - iv. DEIS Table 4-5 does not contain acreages for the Clear Sky to Levee 3<sup>rd</sup> Leg (Consensus Corridor) per DEIS Reference (FPL 2013-TN2941).
  - k. DEIS Subsection 4.3.1.1, Page 4-40, Table 4-7: DEIS Table 4-7 contains acreage values for the Turkey Point Site by cover types and FLUCFCS code. The following inconsistencies with the source cited for DEIS Table 4-7, (FPL 2014-TN4058) are noted:
    - i. DEIS Table 4-7 lists FLUCFCS code 617 “Mixed Wetland Hardwoods” with a permanent impact acreage of 1.2. However, ER Table 4.3-1 does not list FLUCFCS code 617 or a corresponding acreage and percent total but rather list FLUCFCS code 619 “Exotic Hardwoods” with a corresponding disturbed acreage of 0.61.
    - ii. DEIS Table 4-7 characterizes all of the disturbed acreage as “permanent”.
  - l. DEIS Subsection 4.3.1.1, Page 4-43: DEIS Table 4-8, “Permanent Habitat Loss on the FPL Turkey Point Property Attributed to Building Units 6 and 7 Facilities”, contains total acreage and wetland acreage values attributed to constructing Units 6 & 7. The following inconsistencies with the source (adapted) cited for DEIS Table 4-8, (FPL 2014-TN4058, Table 4.3-1 of Revision 6) are noted:
    - i. The following acreage values do not reflect the values in ER Table 4.3-1, Revision 6, but rather reflects those of ER Table 4.3-1, Revision 4, prior to the relocation of the FPL Reclaimed Wastewater-Treatment Facility: the acreages for the “FPL Reclaimed Water-Treatment Facility (alternate location)”, “Spoils Area B”, and “Spoils Area C”.
    - ii. The wetland acreage value for the “FPL Reclaimed Water-Treatment Facility (alternate location)” include FLUCFCS code 437 Australian

Pine; however, footnote b for DEIS Table 4-8 indicates that "all 500 and 600 series FLUCFCS codes and 743W are considered in this analysis to be wetlands".

- iii. Acreages are included for the "Treated Reclaimed Water Delivery Pipelines"; however, as noted in the table note for ER Table 4.3-1, Revision 6, "The treated reclaimed water supply pipeline is now fully within the heavy haul road disturbed area and is not separately considered".
  - iv. The "Nuclear Administration Parking" should be titled "Nuclear Administration Building" as described in ER Table 4.3-1, Revision 6.
  - v. DEIS Table 4-8 reports the total wetland acreage as **328.12 ac**. A summation of reconciled acreage values indicates that this number should be **316.16 ac**. Also note, there are locations in the DEIS text that will require reconciliation. For example, DEIS Subsection 7.3.1.1, page 7-19, Lines 28-31.
- m. DEIS Subsection 4.3.1, Page 4-44, Table 4-9: DEIS Table 4-9 contains acreage values for the Turkey Point Site by wetland FLUCFCS code. The following inconsistencies with the source (adapted) cited for DEIS Table 4-9, (FPL 2014-TN4058, Table 4.3-1 of Revision 6) are noted:
- i. The acreage listed under code 612-B is **40.4 ac**. The summation provided in ER Table 4.3-1 for code 612-B is **36.98 ac**.
  - ii. The acreage listed under code 510 is **12.9 ac**. The summation provided in ER Table 4.3-1 for code 510 is **12.45 ac**. Additionally, in DEIS Table 4-7, the acreage listed under code 510 is **12.5 ac**.
  - iii. DEIS Table 4-9 lists FLUCFCS code 617 "Mixed Wetland Hardwoods" with a permanent impact acreage value of 0.4. However, ER Table 4.3-1, does not list FLUCFCS code 617 or a corresponding acreage.
  - iv. There are no numerical FLUCFCS codes listed for the corresponding FLUCFCS code descriptions: "Sawgrass Marsh", "Australian Pine", "Exotic Wetland Hardwoods", "Exotic Wetland Hardwoods-Australian Pine", and "Disturbed Land".
  - v. The acreage in this table is characterized as permanent acreage but the table includes areas of temporary wetland impact.
15. There are instances in the DEIS where there are inconsistencies and/or discrepancies relating to authorizations, permitting and certifications. Instances in the DEIS include (emphasis added):
- a. DEIS Subsection 4.1.2.1, Page 4-20, Lines 5-7: The DEIS states: "The State certification review process also includes a determination of land-use

consistency with local land-use plans and zoning ordinances (Fla. Stat. 29-403.50665 -TN1470).” However, under the Power Plant Siting Act, land use consistency determination does not apply to transmission lines. The land use consistency determination made was for the site and associated facilities that constitute development under state law. Transmission lines are not “development” under Florida law and, therefore, local government land use and zoning ordinances are not applicable. See 403.50665 and 380.04 Fla. Stat.

- b. DEIS Section 4.2, Page 4-25, Lines 39-40 and DEIS Section 5.2, Page 5-6, Lines 38-39: In both instances, the DEIS states: “Consumptive use of surface water and groundwater would require a permit from the FDEP or the water-management district.” The consumptive use authorizations are part of the Conditions of Certification.
- c. DEIS Section 4.6, Page 4-124, Lines 12-16: The DEIS states: “In addition, the **USACE**, the Florida SHPO (FPL 2014-TN4058, Appendix 2.5A), and the Miami-Dade County Office of Historic and Archaeological Resources (NRC 2010-TN1458) **have required FPL to conduct surveys and other studies of offsite areas** and, if practicable, avoid National Register-eligible sites or mitigate effects in an acceptable manner, as determined through consultation with these agencies.” The USACE permit has not been issued and there are no USACE requirements in the Conditions of Certification.
- d. DEIS Subsection 5.1.1.1, Page 5-3, Lines 28-29: The DEIS states: “The applicant would be required to obtain a Coastal Zone Consistency Determination from the State of Florida prior to initiating work.” As noted in the Conditions of Certification issued by the State of Florida Department of Environmental Protection, Section A, Subsection XXIII: “Pursuant to Sections 373.428 and 403.511, F.S., certification of the Certified Facilities constitutes the State’s concurrence that the licensed activity or use is consistent with the federally approved program under the Florida Coastal Management Act.”
- e. DEIS Subsection 5.2.3.1, Page 5-26, Lines 19-20: The DEIS states: “Wastewater from the sanitary and potable water systems would be **discharged to the municipal sewer system.**” However, wastewater from these facilities will be discharged to the Boulder Zone via deep injection wells as described in ER Section 3.3: “This water would also be the source for potable water, the demineralized water system, fire protection, and miscellaneous water users. Effluents would be **discharged to the Boulder Zone via deep injection wells** permitted by the Florida Department of Environmental Protection (FDEP) underground injection control program.”

- f. DEIS Section 5.6, Page 5-81, Lines 33-40: The DEIS states: "All work within a **100-meter radius would be halted** while the appropriate specialist consults with the Florida SHPO and USACE Project Manager, **per the Special Conditions of the DA permit, if one is issued**... Any ground-disturbing activity that impacts a historic property that is potentially eligible, eligible to the NRHP, or contains human remains, all **ground disturbing activities shall halt within 100-meter radius buffer** of the site, and the USACE Project Manager and SHPO notified. Work shall not commence without written notice from both the USACE and SHPO." FPL has not included nor has SHPO required a specific "work halting radius" in the work plans.
- g. DEIS Appendix F-2, Section 1.0, Page 1-1, Lines 19-20 and DEIS Appendix F-3, Section 1.0, Page 1-1, Line 27-28: Appendix F-2 states: "The SCA process provides a certification that **encompasses all licenses** needed for appropriate Florida State, regional, and local agencies." (Nearly identical language is found in Appendix F-3 as cited). ER Section 1.2 states: "\*Pursuant to the Florida Electrical Power Plant Siting Act (PPSA) all state, regional and local permits, **except for certain local land use and zoning approvals and certain state issued licenses required under federally delegated or approved permit programs**, are covered under a single "Certification"."
- h. DEIS Appendix F-3, Subsection 3.1.1.1, Page 3-5, Line 24 and DEIS Appendix F-4, Subsection 2.3.4, Page 2-10, Lines 13-14: Appendix F-3 states: "FPL **has proposed that** RCW use would be limited to 60 days per year (FPL 2012-TN2688)." (Nearly identical language is found in Appendix F-4 as cited). Condition of Certification, Section B. VI. C.2.b.i.(3) states, "**Licensee shall be authorized** to operate the RCW system up to sixty (60) days and withdraw a maximum volume of 7,465 MG in any consecutive twelve (12) month period [equivalent to sixty (60) days at full capacity of 124.416 MGD]."
- i. DEIS Appendix H, Table H-1: Appendix H, Table H-1 does not include the USACE Section 408 permit. However, ER Table 1.2-1 lists the USACE Section 408 permit (3<sup>rd</sup> item in the ER Table 1.2-1).
- j. DEIS Appendix H, Page H-5 to H-8, Table H-1: Appendix H, Table H-1: Federal, State and Local Environmental Permits and Authorizations, under "Description of Requirement" states the following were issued May 19, 2014 under Final Conditions of Certification:
  - i. NPDES storm water operations permit for industrial activities
  - ii. Exploratory well construction permit



- iii. UIC well construction permit (allows for the construction and operational testing of additional injection and dual zone monitoring wells).
- iv. Class I well operation permit
- v. Prevention of significant deterioration construction permit
- vi. Modification of Industrial Wastewater Treatment Facility permit
- vii. NPDES construction stormwater permit
- viii. Operation of Class V, Group 3 domestic wastewater injection (gravity flow) well
- ix. Title V Operations Permit – 0250003-010-AV
- x. Title V Operations Permit – 0250003-21-AV
- xi. Well Construction Permit

ER Table 1.2-1, Authorizations for Turkey Point Units 6 & 7, states: “Pursuant to the Florida Electrical Power Plant Siting Act (PPSA) all state, regional and local permits, **except for certain local land use and zoning approvals and certain state issued licenses required under federally delegated or approved permit programs**, are covered under a single “Certification”. Because the Certification is the sole license of the state and any agency required for construction and operation of the proposed electrical power plant, it is not necessary to apply for permits individually.” **These permits are not issued as part of the Site Certification.**

- 16. The DEIS identifies FPL as “Florida Power and Light Company” and the ER identifies FPL as “Florida Power & Light Company”. The correct legal name is “Florida Power & Light Company”.
- 17. Table 1, below, details instances in the DEIS text where the DEIS cited reference is (FPL 2014-TN4058), Revision 6 of FPL’s ER; however, the numerical values are not consistent with those represented in the cited reference—(FPL 2014-TN4058). (Note, for a given inconsistency, if there is a citation within the DEIS which provides an additional reference, it is also included.) (Bold text provided in Table 1 is provided for emphasis)

Table 1. Inconsistencies Identified in DEIS and Environmental Report, Revision 6

Item No.	Location in DEIS	Citation from DEIS Text that Includes Numerical Value	Corresponding ER Section	Citation from (FPL 2014-TN4058) that Includes Numerical Value
a.	Section 2.1, Page 2-1, Lines 35-36	"The location for the proposed Units 6 and 7 is within portions of Sections 33 and 34 of Township <b>58S</b> Range 40E (FPL 2014-TN4058)"	ER Section 2.1	"The Units 6 & 7 plant area would be located in portions of Sections 33 and 34 of Township <b>57S</b> , Range 40E."
b.	Subsection 2.3.2.1, Page 2-58, Lines 4-8	"For the local area, <b>32 permitted surface-water users</b> ...include landscaping, agriculture, industrial, and ... (a golf course) (FPL 2014-TN4058). Landscape...largest number (31) of permitted users..."	ER Table 2.3-25	ER Table 2.3-25 lists <b>34 surface water permits</b> (31 landscape, 1 agriculture, 1 industrial, 1 golf course).
c.	Subsection 2.3.4.2, Page 2-71, Lines 10-12	"Each pair included a well completed in the Miami Limestone/Key Largo Limestone at depths...from <b>14 to 28 ft</b> and a well completed in the Fort Thompson Formation at depths...from <b>85 to 110 ft</b> ..."	ER Subsection 2.3.1.2.1.4	"Ten observation well pairs...completed to depths...from <b>24 to 110 feet bgs</b> ... installed in the Miami Limestone/Key Largo Limestone and the Fort Thompson Formation."
d.	Subsection 2.5.2.6, Page 2-179, Lines 27-29	"There are <b>35 colleges</b> or universities that are accredited.... that offer professional and paraprofessional training (FPL 2014-TN4058)."	ER Subsection 2.5.2.8.3 ER Table 2.5-43	"There are <b>12 colleges</b> or universities that are accredited... that offer professional and paraprofessional training within 50 miles..." ER Table 2.5-43 also identifies <b>12 colleges</b> .
e.	Subsection 2.9.4, Page 2-210,	"... backup meteorological tower is located about <b>0.4 mi northwest</b> of...proposed Units 6 and 7."	ER Subsection 6.4.2.2	"... the LU tower is currently approximately <b>0.30 miles northwest</b> of Units 6 & 7..."

Item No.	Location in DEIS	Citation from DEIS Text that Includes Numerical Value	Corresponding ER Section	Citation from (FPL 2014-TN4058) that Includes Numerical Value
	Lines 8-9			
f.	Subsection 3.2.2.3, Page 3-18, Table 3-2	The total length of the "Clear Sky-Turkey Point" route for the East Corridor is listed as <b>0.4 miles</b> .	ER Subsection 3.7.2	In the first paragraph of ER Subsection 3.7.2, the length of the "Clear Sky-Turkey Point (230 kV)" transmission line is characterized as <b>0.5 miles</b> .
g.	Subsection 4.4.2, Page 4-104, Lines 8-11  Subsection 4.4.2, Page 4-105, Lines 37-38	On page 4-104: "...assessment of population impacts is based on FPL's estimated peak project workforce analysis (FPL 2014-TN4058). The proposed project schedule assumes 10 years— <b>36 months for preconstruction</b> activities and 84 months for NRC-authorized construction—to build both units...."  On page 4-105: "Also shown is the <b>36 months of preconstruction</b> activities."	ER Subsection 3.10.1.1  ER Table 3.9-1 ER Table 3.10-2 DEIS Figure 4-6 ER Figure 3.10-1 ER Figure 3.10-3	"As described in Section 3.9, preconstruction activities could occur <b>39 months (start of 2<sup>nd</sup> quarter 2013 through end of 2nd quarter 2016)</b> ... before the start of safety-related construction for Units 6 & 7."  ER Tables 3.9-1 and 3.10-2 project <b>39 months for preconstruction</b> activities prior to safety related construction. (Note DEIS Figure 4-6 and ER Figures 3.10-1 and 3.10-3 also illustrate 39 months for preconstruction activities.)
h.	Subsection 4.4.4.5 Page 4-118 through 4-119 Lines 39 through 3	On page 4-118 and 4-119: "... <b>15.4 percent</b> of students in Miami-Dade County... attend private schools (FPL 2014-TN4058)... <b>Fifteen point four percent</b> of in-migrating students..."  Similarly, on page 5-77 "... <b>15.4 percent</b> of students County... attend private	ER Subsection 4.4.2.2.8.3  ER Subsection 5.8.2.2.8.3	"... assumption... percentage of in-migrating... private school... ( <b>15 percent</b> )... The assumption... percentage of in-migrating... private schools... attending private schools in Miami-Dade County ( <b>15 percent</b> )."  (This percentage, <b>15 percent</b> , is also

Item No.	Location in DEIS	Citation from DEIS Text that Includes Numerical Value	Corresponding ER Section	Citation from (FPL 2014-TN4058) that Includes Numerical Value
	Subsection 5.4.4.5, Page 5-77, Lines 9-10	schools (FPL 2014-TN4058)."		consistent with ER Subsection 5.8.2.2.8.3)
i.	Subsection 4.8.1.2, Page 4-130, Lines 31-33	"The resulting estimates are an annual average of <b>89</b> (based on U.S. data) and <b>96</b> (based on Florida data) recordable cases and a peak 12-month amount (months 34 to 45) of <b>162</b> (U.S.) and <b>174</b> (Florida) recordable cases."	ER Table 4.8-1	ER Table 4.8-1 indicates: the Incidence at US Rate annual average as <b>86</b> ; TRC Incidence at FL Rate annual average as <b>93</b> ; TRC Incidence at US Rate Peak 12-month period as <b>161</b> ; and TRC Incidence at FL Rate 12-month period as <b>173</b> . (DEIS values are consistent with an earlier revision for the source.)
j.	Subsection 4.9.2, Page 4-138, Lines 5-7	"FPL estimated a <b>total body dose</b> from Unit 6 of... <b>5.5 mrem/yr</b> based on a worker occupancy...2,080 hours annually (FPL 2014-TN4058)."	ER Table 4.5-4	ER Table 4.5-4 shows the <b>total body dose</b> of <b>5.2 mrem</b> from Unit 6 and the total effective dose equivalent ( <b>TEDE</b> ) of <b>5.5 mrem</b> from Unit 6.
k.	Subsection 10.4.2, Page 10-15, Lines 28-33	"FPL states in Table 10.2-1 of its ER that construction of the...two new units at Turkey Point would involve... <b>22,000 tons of rebar</b> .... (FPL 2014-TN4058). Construction would also use <b>large quantities</b> of aluminum, copper... and quarry materials (nuclear and construction grade fill material, aggregate, sand, etc.)."	ER Table 10.2-1	ER Table 10.2-1 lists <b>20,000 tons of rebar</b> and states, " <b>Small quantities</b> " related to aluminum, boron, titanium, tungsten, and other natural resources.
l.	Appendix F-4,	"FPL's application states that <b>preconstruction activities</b> , which	ER Subsection 1.1.2.7	"No site preparation activities would occur...and the required U.S. Army

Item No.	Location in DEIS	Citation from DEIS Text that Includes Numerical Value	Corresponding ER Section	Citation from (FPL 2014-TN4058) that Includes Numerical Value
	Section 2.0, Page 2-1, Lines 30-33	include activities the USACE denotes as "construction," are <b>expected to occur for 60 months</b> and construction activities, as defined by the NRC... to occur for 66 months (FPL 2014-TN4058)."	ER Section 3.9 ER Table 3.9-1	Corps of Engineers permits are obtained. The project schedule assumes <b>a 69-month duration for preconstruction activities.</b> " (ER Section 3.9 and Table 3.9-1 also indicate a 69-month duration for preconstruction activities.)
m.	Appendix G Subsection G.2.4.3, Page G-16, Line 33-35	"For dose calculation purposes, the average location of the Unit 7 worker was assumed to be at the center of Unit 7 reactor. Table 3.10-2 from the ER (FPL 2014-TN4058) estimates the maximum workforce for Unit 7 during any month to be <b>3,950 people.</b> "	ER Table 3.10-2 ER Subsection 4.5.3.3  DEIS Table G-16.	ER Table 3.10-2 reports the maximum construction workforce as <b>3,950 people.</b> (The maximum construction workforce after fuel load is <b>2800 people.</b> )  Table G-16 defines footnote '(c)' and refers to a maximum Unit 7 worker population of <b>2800 people</b>

18. Table 2 details instances in the DEIS where numerical values are not consistent with other sections of the DEIS (Note, for a given inconsistency, if there is a citation within FPL's ER which provides an additional reference, it is also included. **Bold text provided in Table 2 is provided for emphasis.**).

Table 2. Numerical Value Inconsistencies Within DEIS

Item No.	Location in DEIS	Citation from DEIS Text that Includes Numerical Value	Corresponding DEIS Location	Citation from DEIS Text that Includes Alternate Numerical Value
a.	Subsection 2.4.1.1, Page 2-74, Lines 28-31	"Terrestrial land cover on the Turkey Point site is presented in Table 2-2. Land on the Turkey Point site is used primarily for electric power facilities, and facilities for existing Turkey Point Units 1-5 occupy approximately <b>5,672 ac</b> , composing almost half of the Turkey Point site"	DEIS Table 2-2  ER Table 2.2-1	The referenced table, DEIS Table 2-2, indicates that land use characterized as electric power, FLUCFCS code 831, totals <b>5,682.84 ac</b> .  ER Table 2.2-1 also indicates land use characterized as electric power, FLUCFCS code 831, as <b>5,682.84 ac</b> .
b.	Subsection 2.10.1.2, Page 2-212, Lines 36-39	"As seen in Table 2-57, rates of injuries and illnesses per 100 full-time workers for years 2003-2010 in the <b>heavy and civil engineering construction sector</b> – an important sector baseline for assessing building impacts (Chapter 4) – ranged from 3.8 to 5.9 for the United States and <b>2.4</b> to 7.0 for Florida."	DEIS Subsection 4.8.1.2, Page 4-130, Lines 21-23  DEIS Table 2-57	"As noted in Section 2.10, the total recordable cases rate published by the BLS for 2010 for <b>heavy and civil engineering construction</b> was 3.8 per 100 full-time workers in the United States overall and <b>3.4</b> per 100 full-time workers in Florida."  DEIS Table 2-57 indicates, for the heavy and civil engineering construction sector for Florida, the range is <b>3.4</b> to 7.0 per 100 full-time workers in Florida.
c.	Subsection 2.10.1.2, Page 2-214, Lines 15-16	"As seen in Table 2-58, fatal injury rates for utility operations ranged from 3.6 to <b>6.1</b> per 100,000 workers."	DEIS Table 2-58	DEIS Table 2-58 indicates the range is 3.6 to <b>6.3</b> .
d.	Subsection 4.1.2.2,	"The affected land comprises... <b>1.81 ac of existing electric power facility land</b>	DEIS Subsection 4.3.1.2	DEIS Section 4.3.1.2: "Approximately <b>1.81 ac...is classified as exotic</b>

Item No.	Location in DEIS	Citation from DEIS Text that Includes Numerical Value	Corresponding DEIS Location	Citation from DEIS Text that Includes Alternate Numerical Value
	Page 4-23, Lines 7-10	(FLUCFCS Code 831)...plus... <b>0.52 ac of adjoining land designated as exotic wetland hardwoods</b> (FLUCFCS Code 619)."	Page 4-50, Lines 29-31  ER Table 2.2-5	<b>wetland hardwoods</b> , and the remaining <b>0.52 ac is existing electric power facilities</b> (FPL 2014-TN4058)."  ER Table 2.2-5 lists the Levee Substation acreage for FLUCCS code 619, <b>Exotic Wetland Hardwoods, as 1.81 ac</b> , and for FLUCCS code 831, <b>Electric Power Facilities as 0.52 ac</b> .
	DEIS Subsection 4.3.1.3, Page 4-58, Lines 38-39	" <u>Limpkin</u> . More than <b>100 ac of mangrove habitat</b> would be permanently lost, although only 28 ac of the affected areas are high-quality mangrove habitat."	DEIS Table 4-7 DEIS Table 4-9  ER Table 4.3-1	DEIS Table 4-7 presents this acreage as <b>77.4 ac</b> , and DEIS Table 4-9 presents this acreage as <b>80.8 ac</b> .  ER Table 4.3-1 presents this acreage as <b>77.39 ac</b>
e.	Subsection 5.9.3.2, Page 5-107, Lines 22-25	"...the estimated collective <b>whole body dose</b> to the population living within 50 mi of the Turkey Point Units 6 and 7 is <b>9.4 person-rem/yr...</b> "	Subsection 5.9.3.2 Page 5-10 Lines 10-12  ER Table 5.4-10	DEIS Subsection 5.9.3.2: "In ER Table 5.4-10 (FPL 2014-TN4058), FPL estimated...collective <b>total body dose</b> within a 50 mi radius... <b>8.0 person-rem/yr...</b> "  ER Table 5.4-10 reports <b>8.0 person-rem/yr</b> as the collective dose for Turkey Point Units 6 and 7.
f	Appendix F-2, Section 2.1,	"Two potential routes were proposed for the West corridor—the preferred and consensus routes. Each route would	DEIS Table 2-4	DEIS Table 2-4 indicates that this length is <b>52 miles</b> .



Item No.	Location in DEIS	Citation from DEIS Text that Includes Numerical Value	Corresponding DEIS Location	Citation from DEIS Text that Includes Alternate Numerical Value
	Page 2-4, Lines 40-43	eventually be about <b>89 mi</b> long..." (Reference for statement was corrupt.)	ER Subsection 3.7.2	In the first paragraph of ER Subsection 3.7.2, the length of the West corridor "Clear Sky – Pennsuco (230 kV)" is characterized as <b>52 miles</b> .
g.	Appendix F-2, Section 2.3.2, Page 2-9, Lines 16-18	"Approximately 89 mi of corridors are being proposed; approximately 52 mi of the corridor would be associated with either of the two West corridor routes, and approximately <b>36 mi</b> would be associated with the East corridor."	DEIS Table 2-4  ER Subsection 3.7.2	DEIS Table 2-4 indicates that this length is <b>37 miles</b> .  In the first paragraph of ER Subsection 3.7.2, the length of the East Corridor comprised of Clear Sky to Davis (19 miles) plus Davis to Miami (18 miles) results in a total of <b>37 miles</b> .
h.	Appendix F-2, Section 5.6, Page 5-4, Lines 35-36	"The construction of Units 6 and 7 could permanently eliminate <b>182 ac</b> of mudflat suitable as piping plover ( <i>Charadrius melodus</i> ) wintering habitat."	DEIS Subsection 4.3.2.1, Page 4-77, Lines 33-35  DEIS Appendix F-2, Subsection 3.1.1, Page 3-3, Lines 14-17	"As described in ER Revision 6 (FPL 2014-TN4058) wetland and aquatic habitats within the proposed Units 6 and 7 plant area and adjacent laydown areas include the following: <ul style="list-style-type: none"> <li>▪ 187.5 ac of mudflats..."</li> </ul> Similarly, Appendix F-2: "Wetland and aquatic habitats within the proposed Units 6 and 7 plant area and adjacent laydown areas total approximately 270 ac and include the following land-cover classes: <ul style="list-style-type: none"> <li>• 187.5 ac of mudflats..."</li> </ul>

Item No.	Location in DEIS	Citation from DEIS Text that Includes Numerical Value	Corresponding DEIS Location	Citation from DEIS Text that Includes Alternate Numerical Value
			ER Section 2.4	ER Section 2.4: "Wetland habitats within the Units 6 & 7 plant area and the adjacent laydown area include mudflats (187.5 acres)..."

### Executive Summary

19. Executive Summary, Page xxxv, Table ES-1: In DEIS Table ES-1, the DEIS indicates:
  - a. For the "Land Use" Resource Category, that the **operation environmental impact** level is "MODERATE (NRC authorized **construction impact** level is SMALL.)" (emphasis added).
  - b. For the "Socioeconomic Physical Impacts" Category, that the construction environmental impact level is "**SMALL.**" This is not consistent with DEIS Section 4.12, page 4-148, Table 4-19 and DEIS Subsection 10.2.1, page 10-7, Table 10-1, where this impact level is listed as "**SMALL (adverse) to MODERATE (beneficial)** (NRC authorized construction impact level is SMALL)."
  
20. Executive Summary, Page xl, Table ES-4: In DEIS Table ES-4, "Summary of Environmental Impacts of Construction and Operation of New Nuclear, Coal-Fired, and Natural-Gas-Fired Generating Units and a Combination of Alternatives", for the Socioeconomics impact category, the environmental impact levels for coal, natural gas, and combination of alternatives are inconsistent with their corresponding impact levels in DEIS Subsection 9.2.2.1, page 9-15, Table 9-1; Subsection 9.2.2.2, page 9-21, Table 9-2; Subsection 9.2.4, page 9-29, Table 9-3; and Subsection 9.2.5, Page 9-30, Table 9-4. In the case of natural gas, the impact level is listed as "MODERATE (beneficial)" in DEIS Table 9-2 and "SMALL (beneficial)" in DEIS Table ES-4. For the combination of alternatives, the impact levels for beneficial and adverse are reversed. For coal, both beneficial and adverse are MODERATE in DEIS Table 9-1; however, in DEIS Table ES-4, the impact level for beneficial is listed as "SMALL (beneficial)".

### Chapter 1.0 Introduction

21. DEIS Section 1.3, Page 1-9, Lines 25-28: The DEIS states: "The purpose and need of the NRC proposed action—NRC authorization of the construction and operation of two AP1000 units at the Turkey Point site—is to provide additional baseload electrical generation capacity for use in the FPL service territory." ER Subsection 1.1.1, Purpose and Need, states: "FPL's purpose is to provide additional baseload generation to maintain system reliability, increase fuel diversity, and allow progress toward meaningful CO<sub>2</sub> emissions reductions."
  
22. DEIS Section 1.4, Page 1-10, Lines 27-28: The DEIS states: "Using this process, FPL reviewed multiple sites and identified **23 candidate sites**...from which the alternative sites were selected." This is not consistent with page 9-37 of the DEIS, Subsection 9.3.1.3, Selection of **Potential Sites**, which states: "Through this process, FPL identified 6 additional greenfield sites to consider as potential sites for a total of **21 potential sites** as identified on Figure 9-4." In both instances, the DEIS cites FPL 2014-TN4058, FPL's ER. The evaluation in FPL's ER is based on the reference: Florida Power & Light Company Turkey Point 6 & 7, New

Nuclear Power Generation (Formerly Project Bluegrass) Augmented Site Selection Study Report, August 2011. Section 4.0, Identification of Potential Sites, of this reference, states: "Cumulatively, a total of **21 potential sites** were identified". (emphasis added)

#### Chapter 2.0 Affected Environment

23. DEIS Subsection 2.2.1.6, Page 2-14, Lines 12-13: The DEIS states: "Agricultural land composes approximately **9 percent (3,500 ac)** of land use within the 6 mi vicinity of the Turkey Point site (Figure 2-4; **Table 2-2**)." DEIS Subsection 2.2.1.6, page 2-8, Table 2-2 details the acreage related to the Turkey Point site, where no agricultural land use is designated, rather than the 6 mi vicinity. DEIS Subsection 2.2.1.6, page 2-8/2-10, **Table 2-3**, contains the agricultural land acreage within the 6 mi vicinity. However, the total land use acreage depicted in DEIS Table 2-3 and ER Table 2.2-1 is 62,941.15 acres; 9 percent of 62,941.15 acres is approximately 5,665 acres not 3,500 acres (3,500 acres is approximately 5.6 percent). From DEIS Table 2-3 and ER Table 2.2-1, agricultural land composes approximately **4.5 percent (2,850 ac)**. (emphasis added)
24. DEIS Subsection 2.2.2.3, Page 2-20, Lines 12-15: The DEIS states: "The reclaimed wastewater pipelines from the FPL RWTF would be routed south along the eastern side of the cooling canals to the makeup-water reservoir, **traversing a mangrove forest...**" The Turkey Point Units 6 & 7 Mitigation Plan, Revision 2, DEIS Reference (FPL 2011-TN1012), Section 2.3.2 states: "The treated reclaimed water pipeline between the FPL reclaimed water treatment facility potential alternative location and the Site would be **installed within construction access roadways**, avoiding additional wetland impact." (emphasis added)
25. DEIS Subsection 2.2.2.3, Page 2-20, Lines 25-27: The DEIS states: "Existing land uses in the area to be disturbed by the potable water pipelines would be approximately **20 percent** agricultural land, **19 percent** urban or built-up land, and approximately **30 percent** marsh and wetland (FPL 2014-TN4058)." The cited reference in the DEIS text, (FPL 2014-TN4058), is FPL's ER Revision 6. Taking into consideration the acreages in DEIS Subsection 2.2.3, page 2-20, Table 2-6 and ER Table 2.2-6, the percentages are approximately **21 percent** for agricultural land; **6 percent** for urban or build-up; and **49 percent** for marsh and wetland. (emphasis added)
26. DEIS Subsection 2.2.3.2, Page 2-25, Lines 9-11: The DEIS states: "Most of this land is wetland... urban or built-up lands account for approximately **15 percent** (FPL 2014-TN4058)." Taking into consideration the acreages in DEIS Subsection 2.2.3, page 2-23, Table 2-7 and ER Table 2.2-8, the percentage for urban or build-up is approximately **13 percent**. (emphasis added)
27. DEIS Subsection 2.4.1.1, Page 2-74, Line 35-38: The DEIS states: "Most of the plant area comprises mudflats that are inundated annually for **3 to 4 months** and are sparsely vegetated

- with saltwort (*Batis maritime*)...(FPL 2014-TN4058)." The cited reference in the DEIS text, (FPL 2014-TN4058), is FPL's ER Revision 6. The timeframe, 3 to 4 months, is consistent with an earlier revision of FPL's ER but does not reflect the timeframe given in FPL's ER Revision 6. ER, Revision 6, Section 2.4 states: "...the sparsely vegetated mudflats are typically inundated by water **7 to 8 months** out of the year and a few hardy plant species that can tolerate these conditions persist, including saltwort (*Batis maritima*)..." (emphasis added)
28. DEIS Subsection 2.4.1.1, Page 2-76, Lines 3-6: DEIS Section 2.4.1.1 states: "**Wetland spoil areas** totaling about **9 ac** occur adjacent to remnant canals...(FPL 2014-TN4058)." The cited reference in the DEIS text, (FPL 2014-TN4058) is FPL's ER Revision 6. ER Section 2.4 states: "Wetland habitats within the Units 6 & 7 plant area and adjacent laydown area include...and **wetland spoil areas (10 acres)**. (emphasis added)
29. DEIS Subsection 2.4.1.1, Page 2-76, Lines 8-12: The DEIS states: "The raised fill areas contain maintained grasses as well as...and **melaleuca (*Melaleuca quinquinervia*)** (FPL 2014-TN4058)." The cited reference in the DEIS text, (FPL 2014-TN4058), is FPL's ER Revision 6. ER Section 2.4 includes a similar discussion of vegetation in these areas but does not include melaleuca (*Melaleuca quinquinervia*) (emphasis added)
30. DEIS Subsection 2.4.1.1, Page 2-77, Lines 6-14: The DEIS states: "During April 2009, surveys were also conducted to determine...reptile presence and relative abundance...(FPL 2009-TN1444)...**Reptiles were observed, including the American alligator (*Alligator mississippiensis*)**..." The cited DEIS reference, (FPL 2009-TN1444), is the "Mammal Trapping and Herpetology Report Turkey Point Property Associated with Units 6 & 7, April 13-16, 2009". The referenced report does not indicate that the American alligator was observed during April 2009 surveys. Nor is this species listed in ER Table 2.4-2 which presents results of April 2009 (and earlier) surveys. (emphasis added)
31. DEIS Subsection 2.4.1.4, Page 2-108, Lines 36-40: The DEIS states: "The **eastern indigo snake** is a...threatened species (FWS 2012-TN117; FNAI 2014-TN3668)... **None were observed** during recent surveys of the **transmission line corridors** (FPL 2014-TN4058)." The cited reference in the DEIS text, (FPL 2014-TN4058), is FPL's ER Revision 6. ER Subsection 2.4.1.2 states: "**Indigo snakes have been observed**...and at two locations in the Eastern Preferred **transmission line corridor** (in 2011)." (emphasis added)
32. DEIS Subsection 2.4.2.1, Page 2-119, Lines 2-4 and DEIS Subsection 2.4.2.1, Page 2-121, Table 2-18: The DEIS (Page 2-119) states: "onsite surface-water habitats **exclusive of the IWF** include hypersaline mudflats, remnant canals...and areas of open water". The onsite surface-water habitats listed are **inclusive of the IWF**. Further, the sentences that follow describe data taken from sampling locations that are located **within the permitted IWF**. Similarly, DEIS Table 2-18, "Fish Species Present in Surface-Water Habitats **Exclusive of the IWF** on Turkey Point Site in Summer 2009", includes observations from locations **within**

**the permitted IWF**; all listed observation points in this table are located within the IWF as described in DEIS reference FPL 2009-TN201. The statement and Title of Table 2-18 should reflect that the onsite surface-water habitats and surface water sampling are “inclusive of the IWF”. (emphasis added)

33. DEIS Subsection 2.4.2.4, Page 2-154, Lines 38-40: The DEIS states: “Because modifications to the existing equipment barge-unloading area were expected... a survey of seagrass presence in that area was conducted during the summer of 2008 (**EAI 2009-TN153**).” The correct reference for the seagrass survey of the equipment barge unloading area is: (**FPL 2010-TN272**). (emphasis added)
34. DEIS Subsection 2.7.1, Page 2-195, Lines 1-2: The DEIS states: “Lake Okeechobee and Everglades regions, and **Fort Davis**...became a base of operations.” The name should be **Fort Dallas** as indicated in Cultural Resource Assessment Survey for the Turkey Point Units 6 & 7 Site, Associated Non-Linear Facilities, and Spoils Areas on Plant Property [Enclosure 1 of FPL’s response to NRC RAI No. 2.7-1 (eRAI 5480), DEIS reference (FPL2011-TN1512)]. (emphasis added)
35. DEIS Subsection 2.7.3, Page 2-198, Lines 30-36: The DEIS states, “The indirect-effects APE... **has been set at 500 ft on either side** of the centerline of the alignment...(FPL 2009-TN1513; FPL 2009-TN1515; FPL 2011-TN95; FPL 2013-TN2941).” One of the cited references, (FPL 2009-TN1515), “Cultural Resource Assessment Survey Work Plan for the Turkey Point Units 6 & 7 Associated Linear Facilities”, states: “For the purposes of this preliminary analysis, Janus Research defined the areas of potential effects (APE) **as 100 feet from each side** of the East Preferred Corridor ...In addition, a review of previously recorded historic resources within 500 feet of each side of corridors, pipelines, roads, and bridges was conducted.” The final APE **will be established in consultation** with the Florida Department of State, Division of Historical Resources and State Historic Preservation Office (DHR/SHPO).” (emphasis added)
36. DEIS Subsection 2.7.3, Page 2-199, Lines 25-28: The DEIS states: “In addition to the desktop research for the transmission line APE, FPL also conducted a search of the National Register and Florida SHPO site files for a distance of 1.2 mi from the eastern and western transmission line corridors. The research for the offsite linear facilities identified 359 resources and 16 resource groups located with 1.2 mi of these facilities.” The cited reference (FPL 2009-TN1513) “Cultural Resource Assessment Survey Work Plan for the Turkey Point Units 6 & 7 Site and Associated Non-Linear Facilities” did not contain information regarding a search of the National Register and Florida SHPO site files for a distance of 1.2 mi., nor did FPL conduct a search of the National Register and Florida SHPO site files for a distance of 1.2 mi from the eastern and western transmission line corridors.

### Chapter 3.0 Site Layout and Plant Description

37. DEIS Subsection 3.2.2.1, Page 3-8, Lines 21-22 and DEIS Subsection 3.3.1.1, Page 3-23, Lines 19-20: The DEIS (Subsection 3.2.2.1) states: "The proposed stormwater-discharge locations for the main plant area, laydown area, and administration/training/parking area are shown on Figure 3-4." Additionally, the DEIS (Subsection 3.3.1.1) states: "EIS Section 3.2.2.1 provides a description of the drainage system and Figure 3-4 shows the stormwater outfall locations." The text indicates that stormwater discharge locations and stormwater outfall locations are shown on Figure 3-4. However, neither the stormwater discharge locations nor the stormwater outfall locations are shown on this figure.
38. DEIS Subsection 3.2.2.2, Page 3-10, Lines 13-14; Appendix F-3, Subsection 3.1.1.1, Page 3-5, Lines 34-35; and Appendix F-4, Subsection 2.3.4, Pages 2-9/2-10, Lines 40/1: DEIS (Subsection 3.2.2.2) states: "A typical injection well steel casing would be lined with...**with grout in the annulus...**" Similar descriptions occur in Appendix F-3 (Subsection 3.1.1.1) and Appendix F-4 (Subsection 2.3.4). In contrast, in a letter dated April 22, 2014, FPL submitted a supplemental response to NRC Request for Additional Information Letter No. 72 (eRAI 6985), ML14113A411, which states: "The **annular space...** will be filled with a non-hazardous corrosion inhibitor (e.g., **one percent Baracor 100 solution**)..." This supplemental response indicates that the annular space will be lined with a non-hazardous corrosion inhibitor. Additionally, ER Figure 3.4-3 illustrates that the annular space is filled with "**1% Baracor 100 solution**". (emphasis added)
39. DEIS Subsection 3.2.2.3, Page 3-16, Lines 23-25: The DEIS states: "FPL plans to build...It would be sized to serve the operational workforce of both units (approximately **500 workers**)...workforce expected to be onsite during an **outage (approximately 1,000 workers)**." The operational workforce and outage workforce numbers should reflect the values indicated in the supporting documentation. ER Subsection 3.10.3 states: "... it is estimated that the onsite operations workforce would be 403 personnel for each unit, or **806 personnel**..." Additionally, ER Subsection 5.8.2 states: "Refueling outages for each unit would occur every 18 months, last approximately 30 days, and require **the addition of approximately 600–1000 temporary workers**." (emphasis added)
40. DEIS Subsection 3.4.4.2, Page 3-38/3-39, Table 3-5: DEIS Table 3-5 reflect constituents' concentrations (or stated value in the case of conductivity) that are not consistent with those reported in ER Table 3.6-3 for saltwater. These include: Nitrate as N; Total Organic Compounds, Total Dissolved Solids; Barium; Copper; Silica as SiO<sub>2</sub>; and conductivity. The listed sources for DEIS Table 3-5 are: FPL 2014-TN4058 (ER Revision 6) and FPL 2012-TN263 (FPL response to RAI No. 4.2-2). The listed constituents' concentrations (or stated value in the case of conductivity) are consistent with DEIS reference FPL 2012-TN263.

However, subsequent to the submission of RAI response 4.2-2, the values were revised as reflected in ER Revision 6.

41. DEIS Subsection 3.4.4.3, Page 3-39, Lines 4-7: The DEIS states: "Based on four operating hours per month for each engine, the estimated annual emissions...and **24,004 lb of hydrocarbons and nitrogen oxides** (FPL 2014-TN4058)." ER Table 3.6-4 lists 11.83 tons/year which is equivalent to **23,660 lbs.** (11.83 tons x 2000 lbs/tons = 23,660 lbs.). (emphasis added)

#### Chapter 4.0 Construction Impacts at the Turkey Point Site

42. DEIS Subsection 4.1.2.1, Page 4-21, Table 4-6: DEIS Table 4-6 contains the header "**L-31 Canal (West Consensus)**". DEIS reference, (FPL2013-TN2941), refers to this transmission line access corridor as "**L-31N Canal and Levee**". (emphasis added)
43. DEIS Subsection 4.2.1: There are inconsistencies in the DEIS regarding the duration of dewatering activities:
- DEIS Subsection 4.2.1.1, Page 4-27, Lines 37-41: The DEIS states: "...the expected dewatering flow rate into the IWF would be 1,000 gpm for 13 weeks, followed by 1,200 gpm for 13 weeks, followed by an extended period at 200 gpm. However, taking a conservative approach, FPL assumed that the maximum dewatering flows would be 1,200 gpm for 1 year followed by 200 gpm for a period of about 24 months."
  - DEIS Subsection 4.2.1.2, Page 4-29, Lines 26-29: The DEIS states: "FPL (2014-TN4058) estimated that a maximum of 1,000 gpm of groundwater would be pumped for up to 13 weeks at each of the two deep excavation pits during the initial excavation and grouting phase, followed by a 24-month period of pumping at up to 200 gpm.";
  - DEIS Subsection 4.2.1.4, Page 4-33, Lines 17-19: The DEIS states: "The 1,200 gpm (1.7 Mgd) discharge that could occur over the course of a year..."

The following explanation can be used to reconcile each of these inconsistencies: Because the start of the plant excavation would be staggered, the expected total maximum dewatering flow rate into the IWF would be 1,000 gpm for 6 months, followed by 1,200 gpm for 6 months, followed by 400 gpm for 18 months and then 200 gpm for 6 months. However, taking a conservative approach, FPL assumed that the maximum dewatering flows would be 1,200 gpm for 1 year followed by 400 gpm for a period of about 24 months.

44. DEIS Subsection 4.3.1.1, Page 4-42, Lines 11-16: The DEIS states "Loss of mangrove stands...This extent of permanent mangrove cover loss...is a noticeable impact. However, **some of the lost mangrove cover** is from remnant stands in tidal creeks that **have been isolated from Biscayne Bay by cooling canals.**" ER Subsection 2.2.1.1.2, states: "Mangrove heads, remnants of the original tidal creeks, contain...**The connection between these creeks and Biscayne Bay were severed during construction** of the industrial



wastewater facility.” **All of the mangrove areas** proposed for permanent impact **are isolated** from Biscayne Bay by cooling canals, roads, and other existing plant-related development. (emphasis added)

45. DEIS Subsection 4.3.1.1, Page 4-43/4-44, Lines 21/5: The DEIS states: “FPL has accounted for **secondary impacts on wetlands** at all proposed wetland fill locations associated with temporary road improvement for construction access as well as other non-linear facilities by calculating the acreage of a 25 ft buffer of those proposed fill locations. Secondary impacts on wetlands would also be mitigated per State of Florida regulations (State of Florida 2014-TN3637), but FPL has proposed to do so **at a reduced level equal to 60 percent of direct impacts** (FPL 2011-TN1012).” There is no specific FDEP guidance on mitigation for secondary impacts, which are potential impacts to wetlands adjacent to where the facilities will be located (direct impacts). FPL has proposed a very conservative mitigation approach by providing 60 percent of the mitigation required had the wetlands impacts been direct impacts. This is consistent with the mitigation approach approved by FDEP for previous FPL projects. (emphasis added)
46. DEIS Subsection 4.3.1.1, Page 4-44, Lines 21-23: The DEIS states: “Spoils would be deposited mostly on previously filled areas but would also **fill in additional canal acreage classed as streams and waterways.**” ER Section 2.4 states: “Spoils from the Units 6 & 7 plant area, FPL reclaimed water treatment facility, and other construction locations would be deposited on three areas (total approximately 211 acres) within the industrial wastewater facility. Two of these areas would be located on wide berms on either side of Grand Canal, the primary north-south canal in the center of the facility. The third would be along a strip of land below the southern end of the industrial wastewater facility. **All three areas have been used historically for spoil deposition** and contain scattered patches of early succession vegetation (grasses, low shrubs, etc.).” (emphasis added)
47. DEIS Subsection 4.3.1.2, Page 4-49, Lines 14-15: The DEIS states: “Adjacent wetlands **would also be affected** by siltation and runoff.” FPL has committed to utilizing BMPs to prevent erosion/sedimentation impacts. (emphasis added)
48. DEIS Subsection 4.3.1.6, Page 4-70, Lines 17-21: The DEIS states: “FPL proposes to remove or control exotic vegetation...FPL also proposes to maintain and monitor vegetation **for 3 years after mitigation** activities...” The DEIS reference, (FPL 2011-TN1012), “Turkey Point Units 6 & 7 Mitigation Plan”, states: “Success criteria, to be negotiated in consultation with the FDEP, USACE, and DERM, will likely...include 5% or less cover by exotic species...for a period **of at least 3 years following** initiation of mitigation activities.” (emphasis added)
49. DEIS Subsection 4.3.1.6, Page 4-71, Table 4-11: DEIS Table 4-11 contains the following inconsistencies with DEIS reference, (FPL 2011-TN1012), “Turkey Point Units 6 & 7 Mitigation Plan”:

- a. In the "W.A.T.E.R. Debits" category, the "Reclaimed Water-Treatment Facility (W.A.T.E.R.)" site should list the currently proposed values rather than the originally proposed. The current proposed values are as follows: "Impact (ac)" = 39.5, and "Wetland Functional Change (Mitigation Units)" = -33
  - b. The "West Preferred Transmission Line" site should be included under "UMAM Debits", not "W.A.T.E.R. Debits".
  - c. In the "UMAM Debits" category, the "Reclaimed Water Pipeline (UMAM)" site is referencing values associated with the Treated Reclaimed Water Pipeline from the originally-proposed location. The revised values for the "Reclaimed Water Pipeline (UMAM)" are as follows: "Impact (ac)" = 43.6 ac, and "Wetland Functional Change (Mitigation Units)" = -4.8 Mitigation Units.
  - d. In the "UMAM Debits" category, the "Construction Access Road (UMAM)" "Impact (ac)" should be 81.6 ac., not 45.0 ac.
  - e. After reconciliation, the "Subtotals" should be revised as follows: "W.A.T.E.R. Debits"; "Impact (ac)" = 315.86, "Wetland Functional Change (Mitigation Units)" = 201.35; "UMAM Debits"; "Impact (ac)" = 433.4, "Wetland Functional Change (Mitigation Units)" = 326.24; and "UMAM Credits"; "Wetland Functional Change (Mitigation Units)" = 333.5.
  - f. After reconciliation, the "Net difference in Wetland Function (Credits)" = 7.21.
  - g. The "Overall Net Mitigation Ratio (credit basis)" should be presented on an acreage basis rather than credit basis.
  - h. Temporary wetland impacts (pipelines) should be separated from permanent wetland impacts.
50. DEIS Subsection 4.3.2.1, Page 4-78, Lines 31-32: The DEIS states: "The RWTF would be built on approximately 44 ac of land immediately north and east of the IWF near SW 360th Streets (Figure 3-1)." The RWTF is located north and west, as illustrated on DEIS Figure 3-1. (emphasis added)
51. DEIS Subsection 4.3.2.3, Page 4-93, Lines 39-41: The DEIS states: "The **American crocodile** is currently listed as **Federally endangered** and **State threatened**..." As of 2007, the **American crocodile is Federally threatened**. As of 2010, all Federally listed species that occur in Florida are now included on Florida's list as Federally-designated Endangered or Federally-designated Threatened species. (emphasis added)
52. DEIS Subsection 4.3.2.3, Page 4-95, Lines 5-7 and DEIS Subsection 4.3.2.5, Page 4-98, Lines 16-17: The DEIS (Subsection 4.3.2.3) states: "As shown in **Figures 2-30 and 2-31**, surveys conducted by FPL from 1978 to 2013 have shown that only **a few nests have been observed in areas where muck disposal would occur**." Additionally, the DEIS (Subsection 4.3.2.5) states: "**Nests** have also been documented **along the IWF Grand Canal where muck disposal is planned**." Reference should be to DEIS **Figure 2-31**, "Locations of

Crocodile Nests in the Turkey Point IWF, 1978–2010”, and DEIS **Figure 2-32**, “Locations of Crocodile Nests in the Turkey Point IWF, 2011-2013.” Additionally, **neither figure shows nests located upon the spoils disposal areas.** (emphasis added)

53. DEIS Section 4.8, Page 4-129, Lines 12-13: The DEIS states: “The area south and southwest of the site consists primarily of marshland and glades, and contains no resident human population.” However, ER Table 2.5-1 shows 2,249 people living to the south (ranging from 5 to 30 miles) and 15 people living to the southwest (ranging from 40 to 50 miles).
54. DEIS Section 4.8, Page 4-129, Lines 14-16: The DEIS states: “Extrapolating from data in the ER (FPL 2014-TN4058), in 2010 approximately **87,000 people** lived within 10 mi of the site and approximately **50,000 others** are estimated to have worked or visited within this radius...” The DEIS references the ER for this data; however, ER Table 2.5-1 and FSAR Subsection 2.1.3.1 show **192,594 combined residents and transients** within 10 miles of Turkey Point. FSAR Subsection 2.1.3.3 indicates that 53,547 of these people are transients. Subtracting yields **139,047 residents, not 87,000.** (emphasis added)
55. DEIS Subsection 4.8.2, Page 4-132, Lines 21-32: The DEIS states: “Similarly, the nearest residences at Homestead Bayfront Park (2.7 mi from the proposed units)...which would be close to the measured **background** noise levels of 49.4 dBA for the daytime and **47.3 dBA for the nighttime**...The day-care facility (2 mi from the proposed units), would experience a maximum noise level during the site preparation and construction phase of about **49.6 dBA during the daytime** and **51.1 dBA during the nighttime**...” The data in this paragraph references the noise study in the Site Certification Application (SCA). However, Table 5.7.4-3 (and Table 5.7.4-5) of the SCA reports the **background nighttime** sound pressure level for site S7 (Homestead Bayfront Park) value to be **47.2 dBA**. Additionally, the maximum sound pressure level for site S6 (day-care facility) during pre-construction and construction as reported from the noise study in the Site Certification Application (SCA), Table 5.7.4-4 of the SCA, are **50.2 dBA for daytime** and **50.4 dBA for nighttime for preconstruction**. And, Table 5.7.4-6 on **construction** reports **49.2 dBA for daytime** and **49.5 dBA for nighttime**. The DEIS is reporting values for site S5 (the northern FPL boundary). (emphasis added)
56. DEIS Subsection 4.9.1, Page 4-137, Lines 18-20 and Appendix G, Section G.2.4.4, Page G-16, Line 27: The DEIS (Subsection 4.9.1) states: “...FPL calculated an annual dose to the construction worker of **0.009 mrem** (FPL 2014-TN4058)” and references the ER. Similar language appears in Appendix G (Subsection G.2.4.4). The ISFSI dose was subsequently revised to **0.013 mrem** in the response to RAI 12.4.1.9.3-1 (eRAI 5430), L-2014-322, dated October 22, 2014, ML14297A026. (emphasis added)
57. DEIS Section 4.11, Page 4-146, Table 4-18: In DEIS Table 4-18, in the “Aquatic Ecosystems” impact category, the DEIS states: “FPL would follow the guidance provided by the National

Marine Fisheries Service (NMFS) to protect sea turtles and Smalltooth Sawfish during nearshore construction activities.” The reference is a December 19, 2006 letter from Shelley Norton (NMFS) to Harriet Nash (NRC). The “Reasonable and Prudent Measures” outlined by NMFS represent a significant commitment for FPL. Among the documents reviewed (ER, SCA, RAIs), there is no record that FPL has committed to these actions. In-water work is limited to 0.1 acres of dredging within the existing turning basin; this area will be isolated from adjacent waters and manatee observers will be utilized in accordance with the FWC Standard Manatee Conditions for In-Water Work. These protective measures would also minimize the potential for impact to smalltooth sawfish or sea turtles if they were to occur within the project area.

#### Chapter 5.0 Operational Impacts at the Turkey Point Site

58. DEIS Subsection 5.3.1.1, Page 5-36, Lines 38-39: The DEIS states: “The extent of the effects of road improvement on wildlife is **contingent upon the decision to restore roads to the preexisting condition** and traffic levels.” FPL has **committed to remove construction access roads within 2 years following construction of Units 6 & 7** as documented in the Conditions of Certification issued by the State of Florida Department of Environmental Protection, Section B, Subsection VII-B-2-a and condition number 4 of the “Standard Amendments to the Comprehensive Development Master Plan for Miami-Dade County” issued by the Board of County Commissioners on April 28, 2010, which states “Within 2 years following the construction of Turkey Point Units 6 & 7 (a) all temporary roadway improvements on publicly owned rights-of-way will be returned to the status of the roadway(s) prior to the commencement of construction of the temporary roadways and roadway improvements, and, (b) any privately owned roadway will be returned to the minimum roadway width required to provide maintenance to FPL facilities and shall not be more than two lanes;” (emphasis added)
59. DEIS Subsection 5.3.1.4, Page 5-50, Lines 17-20: The DEIS states: “FPL would **monitor** for the possible loss of wood stork foraging habitat within the designated wood stork core foraging areas in accordance with a methodology approved by the FWS (FPL 2011-TN1283).” **No monitoring** of wood stork foraging habitat is proposed in the cited reference (FPL 2011-TN1283), but the possible **loss will be quantified and mitigated in accordance with USFWS guidelines.** (emphasis added)
60. DEIS Subsection 5.9.1, Page 5-98, Lines 23-26: The DEIS states: “For the gaseous effluent release pathway, FPL considered the following exposure pathways in evaluating the dose to the maximally exposed individual (MEI): ...ingestion of **goat milk...**” ER Subsection 5.4.1.2 states: “The input parameters for the gaseous effluent exposure pathway are presented in Table 5.4-5”, and Table 5.4-5 includes “**Milk cows**” and does not include “goat milk”. (emphasis added)

61. DEIS Subsection 5.9.1, Page 5-98, Lines 27-28: The DEIS states: "For population doses from the gaseous effluents, FPL used the same exposure pathways as those used for the individual dose assessment." The FPL analysis included cow milk in population doses but not in MEI doses.

Chapter 6.0 Fuel Cycle, Transportation, and Decommissioning

62. DEIS Section 6.1, Page 6-2, Table 6-1: In DEIS Table 6-1, "Table S-3 from 10 CFR 51.51(b), Table of Uranium Fuel-Cycle Environmental Data", portions of Table S-3 have been omitted. The complete table is found in Table S-3 of 10 CFR 51.51 and ER Table 5.7-1. The omissions in Table 6-1 occur under the subheading "Effluents – Chemical (MT)" following the entry for "Particulates" at the bottom of page 6-2. **Following "Particulates", there are omissions for "Other Gases," F and HCl,** and the associated notes regarding those emissions. The "Other Gases" entries should be followed by the subheading "Liquids" and entries for  $\text{SO}_4^-$ ,  $\text{NO}_3^-$ , and Fluoride. Notes from Table S-3 in 10 CFR 51.51(b) documenting various assumptions about how the reference reactor values were derived and regarding the likely dilution requirements for liquid chemical constituents have also been omitted. (emphasis added)
63. DEIS Subsection 6.2.1.1, Page 6-21, Table 6-4: In DEIS Table 6-4, the parameter, "Dose rate at 1 m from vehicle, **mrem/hr**", is reported as 0.1. In ER Table 5.7-6, the same parameter, with a different unit, "Dose rate at 1 meter from vehicle, **person-rem per hour**" is reported as 0.1." (emphasis added)
64. DEIS Subsection 6.2.1.1, Page 6-23, Lines 20-21 and Subsection 6.2.1.1, Page 6-23, Lines 27-29: The DEIS (Subsection 6.2.1.1, Lines 20-21) states: "The following discussion **applies to unirradiated fuel shipments...**" Additionally, the DEIS (Subsection 6.2.1.1, Lines 27-29) states: "**In all cases in this EIS,** the NRC staff assumed that the dose rate from the shipping containers would be 10 mrem/hr at a distance 2 m (6.6 ft) from the side of the transport vehicle." This transport dose rate assumption (equivalent to 14 mrem/hr at 1 m) greatly exceeds that presented in DEIS Table 6-4 (0.1 mrem/hr at 1 m for **unirradiated fuel shipments**). Recommend replacing "In all cases in this EIS..." with "In all irradiated fuel cases in this EIS..." (emphasis added)
65. DEIS Subsection 6.2.2.2, Page 6-34, Table 6-10: In DEIS Table 6-10 footnote (a) indicates the radionuclide inventory in DEIS Table 6-10 was obtained from ER Table 7.4-3. ER Table 7.4-1 contains the radionuclide inventories found in DEIS Table 6-10 with the exception of Kr-85—this exception should be noted in the DEIS Table 6-10.
66. DEIS Subsection 6.2.2.2, Page 6-36, Table 6-11: In DEIS Table 6-11 includes an incorrect footnote (a). Values in the table are reported in person-rem/year, not person-Sv/yr. Footnote

(a) should provide the conversion from person-rem to person-Sv as in DEIS Subsection 6.2.1.1, page 6-22, Table 6-5 and DEIS Subsection 6.2.2.1, page 6-31, Table 6-9.

67. DEIS Subsection 6.2.2.2, Page 6-36, Lines 8-10: The DEIS states: "This risk is very small compared to the  $4.5 \times 10^{-5}$  person-rem/yr that the same population would incur annually...Turkey Point site to Yucca Mountain from exposure to natural sources of radiation." The DEIS Subsection 6.2.2.1, Page 6-33, Lines 10-12 correctly states: "This dose is very small compared to the estimated  $4.5 \times 10^5$  person-rem that the same population...Turkey Point site to Yucca Mountain would incur annually from exposure to natural sources of radiation." (emphasis added)

#### Chapter 7.0 Cumulative Impacts

68. DEIS Section 7.0, Page 7-3, Table 7-1: In DEIS Table 7.1 under the subheading "Energy Projects" the first project listed is "Turkey Point Units 1-4". This should be changed to "Turkey Point Units 1-5" as stated in DEIS Section 7.1, Page 7-9, Line 5.
69. DEIS Subsection 7.2.2.2, Page 7-15, Lines 17-19: The DEIS states: "FPL determined that adding the requested **2,000 gpm** of brackish water would increase the water level of the canals by 0.25 ft (Tetra Tech 2014-TN4126) and eventually reduce salinity to approximately that of Biscayne Bay." The reference states: "The first model configuration, called the *unconstrained* model, predicted water levels in the CCS considering the addition of **14 mgd** of Floridan water. This model was used to determine the increase in canal stage that would likely result from the added inflow: an average of 0.25 ft due to the Floridan-based inflow". The 14 mgd stated in the reference is equivalent to 9722 gpm, which is inconsistent with the 2000 gpm stated in the DEIS. (emphasis added)
70. DEIS Subsection 7.3.1.1, Page 7-19, Lines 10-12: The DEIS states: "**The West Preferred Corridor within the eastern boundary of Everglades National Park** could be counterproductive to future CERP goals..." ER Subsection 2.2.2.2 states that the **West Preferred Corridor (preferred option) "runs along" the eastern boundary of Everglades National Park**, while the West Secondary Corridor (secondary option) runs through the Park. Further, ER Figure 2.2-5 shows both routes in relation to the Park boundary. Therefore, the West Preferred Corridor/preferred option does not present a barrier to surficial flow to eastern Everglades National Park as it is associated with the eastern boundary of the Park. (emphasis added)
71. DEIS Subsection 7.11.2, Page 7-43, Lines 3-7 and Subsection 7.11.2, Page 7-43, Lines 10-12: The DEIS (Subsection 7.11.2, Lines 3-7) states: ".....the NRC staff considers to be acceptable for the **1,000 MW(e) reference reactor**." Similarly, lines 10-12 refer to a 1,000 MW(e) reference reactor. Impacts presented in Table S-4 are based on an **1100 MWe reference reactor** evaluated in the reference WASH-1238. (emphasis added)

#### Chapter 8.0 Need for Power

72. DEIS Subsection 8.1.1, Page 8-2, Lines 35-36: The DEIS states: "FPL is **interconnected with 21** municipal and rural electric cooperative systems (FPL 2014- TN4058)." ER Revision 6 indicates **19 external connections** as illustrated in ER Figure 8.1-3. (emphasis added)
73. DEIS Subsection 8.1.1, Pages 8-3/8-4, Lines 4/5: The DEIS states: "FPL relies on **two measures of reliability** in its resource planning..." However, in FPL's 2014 Ten Year Power Plant Site Plan (DEIS reference [(FPL2014-TN3360)], **FPL introduced a third criterion:** "Therefore, FPL is implementing a new reliability criterion of a 10% GRM in its resource planning work to complement its other two reliability criteria: a 20% total reserve margin criterion for Summer and Winter, and an annual 0.1 day/year loss-of-load-probability (LOLP) criterion." (emphasis added)
74. DEIS Subsection 8.1.1, Page 8-4, Table 8-1: DEIS Table 8-1 cites (FPL 2014-TN3360), "Ten Year Power Plant Site Plan 2014–2023", as the reference. However, only the Industrial values can be verified per Schedules 2.1 and 2.2 (pages 37-38) from the Ten Year Power Plant Site Plan 2014-2023.

#### Chapter 9.0 Environmental Impacts of Alternatives

75. DEIS Subsection 9.3.1.3, Page 9-37, Lines 2-3: The DEIS states: "...an internal FPL team was canvassed to identify known available sites **within the 16 candidate areas.**" ER Subsection 9.3.2.3.1 states: "Functionally, the canvassing was conducted at an August 2006 meeting...The committee was polled to identify the full spectrum of known existing and available sites...**within or near the FPL service territory.**" (emphasis added)
76. DEIS Subsection 9.3.1.4, Page 9-38, Line 3 and DEIS Subsection 9.3.1.4, Page 9-39, Lines 6-7: On page 9-38 of the DEIS, the DEIS section title is "Selection of **Candidate Sites**". On page 9-39, the DEIS states: "The resulting 10 **candidate sites** were: ..." In both instances, the term "Candidate Sites" should be changed to "**Primary Sites**" consistent with ER Subsection 9.3.2.4, Identification of Primary Sites. (emphasis added)
77. DEIS Subsection 9.3.1.5, Page 9-39, Lines 18-28: The DEIS section title is "Selection of **Alternative Sites**". Further, the DEIS states: "The resulting five **alternative sites** proposed by FPL..." In both instances, the term "Alternative Sites" should be changed to "**Candidate Sites**" consistent with ER Subsection 9.3.2.5, Identification of Candidate Sites, and terminology in NUREG-1555 where candidate sites include the proposed and alternative sites. (emphasis added)
78. DEIS Subsection 9.3.1.7, Pages 9-40 through 9-43, general comment: The DEIS discusses the alternative water supply scenarios analyzed by FPL for the three inland sites. Among the water supply features considered were a 3,000 acre reservoir to retain excess flow from the

Kissimmee River/Lake Okeechobee system and a reverse osmosis groundwater treatment system to reduce cooling tower drift salinity to protect sensitive plant and animal communities from salt drift. On page 9-42, the DEIS states that the review team was “unable to confirm” (based solely on drift rates provided for the Units 6 & 7 cooling towers) that salt deposition would be sufficiently adverse to preclude the use of groundwater without reverse osmosis. This is inconsistent with FPL’s analysis of salt drift impacts presented in the Turkey Point Units 6 & 7 Section 404(b)(1) Alternatives Analysis (DEIS Reference FPL 2011-TN1374 at 63-64), particularly the differences in susceptibility of plant species in coastal compared to inland areas. Additionally, the DEIS review team assumed that increased groundwater use “could reduce or eliminate the requirement for a surface-water reservoir” and thus performed a water supply analysis configured without a surface-water reservoir or a reverse osmosis groundwater treatment system, and concluded the inland sites are not environmentally preferable to Turkey Point. FPL maintains, based on its consultation with the South Florida Water Management District (SFWMD) and its experience with the practicability of siting, permitting, and operating power plants in Florida, that these features would be required for these sites.

FPL nonetheless recognizes that the DEIS analysis is conservative for the purpose of NEPA alternative sites analysis because its assumptions tend to underestimate the environmental impacts of the inland alternatives compared to the Turkey Point site. The DEIS also recognizes that the NEPA analysis performed by the NRC is “necessarily imprecise” and that any evaluation of a particular alternative site “must have a wide range of uncertainty” (page 9-243). Therefore, FPL does not object to the DEIS excluding the reverse osmosis groundwater treatment facility and reservoir water supply impact assumptions. However, as the DEIS explains on page 9-43, there is significant uncertainty regarding whether a power plant could be sited at one of these three sites without surface water supply features. In light of other independent regulatory actions, the EIS should clarify that the assumptions regarding reverse osmosis groundwater treatment and onsite reservoirs are based on a reconnaissance-level NEPA review and do not represent a regulatory determination on their practicability.

79. DEIS Subsection 9.3.4.5, Page 9-179, Lines 5-7: The DEIS states, “... after widening of **SR-710**.” “SR-710” should be changed to “**SR 70**” consistent with ER Subsection 9.3.3.3.6.5 which states: “To facilitate the additional traffic, a portion of **SR 70** could be widened to a four-lane highway...” (emphasis added)
80. DEIS Subsection 9.3.6.2, Page 9-247, Lines 12-19: The DEIS states, “The **impacts of traffic** at the Martin site are MODERATE to LARGE (depending on the timing of other projects in the area), while the impacts at the Turkey Point site are MODERATE **because of visual impacts along the eastern corridor**, while the impacts at the Martin site are SMALL **because the new transmission lines** are expected to follow the path of existing lines. Finally, impacts on **cultural and historic resources** at the Turkey Point site are MODERATE because of **visual impacts along the eastern corridor**, while the impacts at the Martin site are SMALL



**because the new transmission lines** are expected to follow the path of existing lines.”  
These sentences appear to conflate the discussion of traffic, transmission, visual, and cultural/historic impacts. (emphasis added)

Chapter 10.0 Conclusions and Recommendations

No comments

Appendix A – Contributors To the Environmental Impact Statement

No comments

Appendix B – Organizations Contacted

No comments

Appendix C – NRC and USACE Environmental Review Correspondence

No comments

Appendix D – Scoping Comments and Responses

No comments

Appendix E – Draft Environmental Impact Statement Comments and Responses

No comments

Appendix F – Key Consultation Correspondence

Appendix F includes the following documents:

Appendix F-2: Biological Assessment for the U.S. Fish and Wildlife Service (USFWS BA);

Appendix F-3, Biological Assessment National Marine Fisheries Service (NMFS BA);

Appendix F-4, Essential Fish Habitat Assessment National Marine Fisheries Service (NMFS EFH)

81. DEIS Appendix F-2, Section 2.1, Page 2-4, Lines 3-4: USFWS BA states: “**Each unit** would have a **mechanical draft cooling tower** for the circulating-water system...” ER Subsection 3.1.2 states: “**For each unit**, the closed-cycle circulating water system (CWS) would consist of **three mechanical draft cooling towers...**” (emphasis added)

82. DEIS Appendix F-2, Section 2.1, Page 2-4, Lines 34-36 and DEIS Appendix F-2 Subsection 3.1.1, Page 3-4, Lines 6-8: USFWS BA (Section 2.1) states: “The review staff assumes water contained in the muck would drain primarily into the IWF; **the spoil pile at the southern end of the site may dewater into Card Sound.**” Similarly the USFWS BA (Subsection 3.1.1)

states: "There is also concern that the disturbance and relocation of the muck from the plant site to the cooling-canal berms **may adversely affect the water quality of the IWF and possibly Card Sound as the muck dewaterers.**" Condition of Certification, Section B "Specific Conditions – Power Plant and Associated Facilities (Excluding Transmission Lines)", Subsection VII "Miami-Dade County", Item C.2, page 78 states: "To the greatest extent practicable FPL shall use proposed Spoil Areas A and C, located along the east and west berms of the Grand Canal. If spoils are placed on Area B, FPL shall implement Best Management Practices to **limit to the extent practicable, runoff from the spoils entering the wetlands areas to the south of the Industrial Wastewater Facility.**" (emphasis added)

83. DEIS Appendix F-2, Section 2.2, Page 2-6, Lines 21-24: USFWS BA states: "Freshwater marsh is the predominant natural land cover on the site; it occupies almost 18 percent of the entire property and almost 40 percent of the undeveloped land area. **An additional 9 percent is mixed wetland hardwoods.**" The following language can be used for clarification: "**An additional 9 percent of the undeveloped land is mixed wetland hardwoods.**" (emphasis added)
84. DEIS Appendix F-2, Section 2.2, Page 2-7, Lines 6-9: USFWS BA states: "Field reconnaissance surveys for threatened or endangered wildlife within existing and proposed new transmission-line corridors as well as a proposed reclaimed water pipeline corridor **consisted of a single vehicular driving survey during 2008 along the corridors** (FPL 2011-TN94)." ER Table 2.4-1 lists results of wildlife surveys and observations along the proposed transmission corridors from **1972 to 2011.** (emphasis added)
85. DEIS Appendix F-2, Section 2.2, Page 2-7, Lines 12-13: USFWS BA states, "Avian surveys were also conducted at selected locations on the Turkey Point site over a 2-day span during **June 2009.**" In addition to the survey conducted on **June 23-24, 2009,** another survey was conducted on **March 24-25, 2009.** The survey report is included in the DEIS reference (FPL2009-TN1334), however, it is not referred to in the USFWS BA. (emphasis added)
86. DEIS Appendix F-2, Subsection 3.1.1, Page 3-3, Lines 5-10: USFWS BA states: "Land clearing, grubbing, grading, and placement of fill would occur on approximately **591 ac** of the Turkey Point site (FPL 2014-TN4058). Excluding cover classes supporting existing development, approximately **577 ac** of intact terrestrial habitat would be lost. Approximately **328 ac** of wetlands on the Turkey Point site would be permanently altered by filling and grading, clearing of vegetation, dewatering, erosion, sedimentation, and other alterations of the existing hydrology such as road construction and culvert installation." The cited source in the text is FPL's ER Revision 6. ER Table 4.3-1, Revision 6, includes revised acreage values that will result in different acreage values—this includes the removal of the treated reclaimed water supply line as this line is now fully within the heavy haul road disturbed area and is no longer separately considered. Additionally, the 577 ac value number includes the spoils area and, as described in ER Section 2.4, the spoils area is not "intact terrestrial habitat." ER

Section 2.4 states: "**All three areas have been used historically for spoil deposition** and contain scattered patches of early succession vegetation (grasses, low shrubs, etc.)." (emphasis added)

87. DEIS Appendix F-2, Subsection 3.1.1, Page 3-3, Lines 23-25: USFWS BA states: "Almost **40 percent** of the affected land area has been filled during previous land-development activities. Another **30 percent** of the affected land, including the entire Units 6 and 7 plant area, is classified as non-vegetated wetland (FPL 2014-TN4058)." ER Section 2.4: Total property acreage is approximately 9400 ac; cooling canals acreage = 5900 ac (open water = 4400 ac); and Units 1-5 = 340 ac. Total filled areas is [(5900 ac-4400 ac) + 340 ac] =1840 ac or **20%**. (emphasis added)
88. There are instances in DEIS Appendix F-2 that describe potential impacts to the American crocodile due to the location of the spoils piles. For example, the USFWS BA (Subsection 3.1.1) states: "Potential impacts on American crocodile include the permanent loss of approximately 270 ac of designated critical habitat to accommodate proposed Units 6 and 7 and the associated infrastructure, and **adverse effects to approximately 211 ac of habitat related to the relocation of material not suitable for reuse...**" Whereas, DEIS reference, (FPL2012-TN1618), Section 5.1, page 5-2 states: "Areas designated for placement of spoil materials excavated from the Units 6 & 7 Site were specifically selected due to **their lack of suitable nesting substrate for the American crocodile and lack of recorded crocodile nesting** in these areas." Also, DEIS reference (FPL2011-TN1283), Section 7.2.1 "American Crocodile", page 59 states: "These spoils areas do not contain suitable nesting habitat, nor do they contain any freshwater refugia for juvenile crocodiles; therefore, **no adverse impacts to the breeding population are anticipated.**" (emphasis added) Instances in the DEIS Appendix F-2 include:
- DEIS Appendix F-2, Subsection 3.1.1, Page 3-4, Lines 1-6.
  - DEIS Appendix F-2, Section 5.10, Page 5-6, Lines 29-32.
  - DEIS Appendix F-2, Subsection 5.10.2, Page 5-7, Lines 42-43.
  - DEIS Appendix F-2, Section 6.6, Page 6-7, Lines 20-23.
  - DEIS Appendix F-2, Section 7.0, Page 7-1 Lines 15-17.
89. DEIS Appendix F-2, Subsection 3.1.3, Pages 3-6, Line 30: USFWS BA states, "The reclaimed water pipeline **corridor would be 75 ft wide** by 9 mi long." DEIS reference (FPL2012-TN1618), "Turkey Point Units 6 & 7 Federal Biological Assessment for Six Listed Species", Section 2.3 states, "Pipeline installation will require **temporary disturbance of an approximately 75-ft-wide** right-of-way within of the pipeline corridor to facilitate trench excavation. Areas of temporary impact will be restored following pipeline construction."
90. DEIS Appendix F-2, Subsection 3.1.3, Page 3-6, Lines 35-37: USFWS BA states, "Although the exact location of the pipeline has not been determined within the corridor, burying the reclaimed water pipeline is expected to temporarily disturb approximately **327 ac** of the **1,876**

ac corridor.” The area of temporary disturbance associated with installation of the reclaimed water pipeline is approximately 75 feet wide by 9 miles long (see comment 89, above), equating approximately **82 acres**. ER Subsection 4.1.2.4 states: “The current land use of the **1886 acres** within this corridor, some smaller portion of which could be impacted with the construction of the pipelines and right-of-way.” DEIS Subsection 4.3.1.2, page 4-45, line 15 states: “Approximately **1,886 ac** of upland, forested, and wetland habitats as well as previously developed or disturbed lands would be affected by installation of the reclaimed water pipeline (Table 4-3).” (emphasis added)

91. DEIS Appendix F-2, Subsection 3.2.1, Page 3-8, Lines 5-6: USFWS BA states: “The circulating-water system flow and heat rejection rates compared to the service-water system would be about **44 times larger** respectively.” ER Table 3.4-1 lists the service water flow rate for normal operation as 10,500 gpm and the heat transferred as  $103 \times 10^6$  Btu/hr. ER Subsection 3.4.1.1.1 lists the circulating water pumps flow rate at 660,100 gpm and the heat load as  $7628 \times 10^6$  BTU/hr. Using these values, the circulating-water system flow and heat rejection rates compared to the service-water system are **62.9 and 74.1, respectively**. (Note all the values listed are on a per unit basis.)
92. DEIS Appendix F-2, Subsection 3.2.1, Page 3-11, Table 3-1 and Appendix F-3, Subsection 4.2.1, Page 4-7, Table 4-1: The following inconsistencies were identified in comparing USFWS BA Table 3-1 and DEIS Table 5-1 on page 5-11.
- The listed concentration for “Triclosan” in USFWS BA Table 3-1 and NMFS BA Table 4-1 differs from the concentration for the same chemical; in the referenced DEIS Subsection 5.2.1.1, Table 5-1, page 5-11.
  - “Ciprofloxacin” in USFWS BA Table 3-1 and NMFS BA Table 4-1 is not listed in the referenced DEIS table, Subsection 5.2.1.1, Table 5-1, page 5-11.
  - The header for the values reads “**Annual Average Drift – Deposition Rates**”; however, the units are shown as (g/m<sup>2</sup>-month) in USFWS BA Table 3-1 and NMFS BA Table 4-1. (emphasis added)
  - Estimated values in USFWS BA Table 3-1 and NMFS BA Table 4-1 for “HCHB” and “Phenanthrene” differs from the values in the referenced DEIS Subsection 5.2.1.1, Table 5-1, page 5-11.
93. DEIS Appendix F-2, Subsection 3.2.1.1, Pages 3-13/3-14, Lines 18-26/1-2: USFWS BA states: “NRC EIS, NUREG-2176 Section 3.2.2.1 discusses stormwater drainage for the plant area...According to Table 2-10 of the NRC EIS, NUREG-2176, the average annual runoff for the plant area prior to building for the period from 2000 to 2010 is...annual average precipitation depth of **56.10 in**...The annual average runoff after building decreases largely due to the removal of the makeup-water reservoir as a contributing area. The maximum annual precipitation during the period was 71.53 in. during 2005, which produces 1,428 ac-ft

of runoff after building compared to **1,646 ac-ft** (NRC EIS, NUREG-2176 Table 2-10) prior to building." There are some inconsistencies with the DEIS (emphasis added):

- a. DEIS Subsection 2.3.1.1 states "The review team estimated an average annual precipitation of **57.10 in.** and maximum annual precipitation of 71.53 in. during the period from 2001 through 2010."
- b. DEIS Table 2-10 reports the maximum total annual runoff for the plant area prior to building for the period from 2000 to 2010 (2001 to 2010) as **1,715 ac-ft.**

94. DEIS Appendix F-2, Section 4.10, Pages 4-9 through 4-12, Lines 17-20 (for text inconsistencies): USFWS BA states: "Recent crocodile monitoring data provided by FPL from 2000 to **2012** are summarized in Table 4-1. The number of successful nests observed from 2000 to **2012** has ranged from a low of 14 in 2001 to a high of 28 in 2008; the number of hatchlings captured has ranged from 134 in 2004 to 548 in 2009." Table 4-1 also includes **2013** data. Also, Figure 4-4 is entitled "Crocodile Nests Observed in 2011 and 2012: The nests shown in this figure do not match the nests shown for the same time period in the FPL Annual American Crocodile Report for 2011 and for 2012. Figure 4-4 also includes 2013 data. USFWS BA Figure 4.4 is consistent with the DEIS Figure 2-32. (emphasis added)
95. DEIS Appendix F-2, Section 4.18, Page 4-15, Lines 27-29: USFWS BA states: "Pineland habitat at the **Gold Coast Railroad Museum Park that borders the proposed East transmission-line corridor** for approximately 700 m is also designated critical habitat for the Florida brickell-bush." The **East Corridor does not border the Gold Coast Railroad Museum Park.** The location of the Gulf Coast railroad Museum is adjacent to Zoo Miami on the north side. The address is 12450 SW 152<sup>nd</sup> St, Miami, FL 33177, <http://www.gcrm.org/> (emphasis added)
96. DEIS Appendix F-2, Section 5.2, Page 5-2, Lines 10-12: USFWS BA states: "Mitigation has also been **proposed** for 1,030 habitat units after applying the FWS mitigation ratio of 2.5:1 for panther habitat." The reference provided in the USFWS BA is (FPL 2011-TN1283). However, Attachment D of this document "Estimated Impacts to Florida Panther Habitats (BDA, 2009)", Page 3 states: "The number of PHUs that the USFWS may require for mitigation for the direct and temporary losses of panther habitat due to improvements to roads accessing the Site was **estimated.** FPL will work with the USFWS, ACOE, and other appropriate agencies to determine mitigation recommendations for the loss of panther habitats after a final design for project features has been achieved consistent with the conditions of site certification."
97. DEIS Appendix F-2, Section 5.7, Page 5-5: This section refers to FPL 2011-TN1283 "FPL Turkey Point Units 6 & 7 Threatened and Endangered Species Evaluation and Management Plan, Rev 1" when describing several wood stork requirements imposed by FFWCC on FPL. The correct reference is (FPL2014-TN3637), "Final Order on Certification, In Re: Florida Power and Light Company Turkey Point Units 6 & 7 Power Plant Siting Application No. PA 03-45A3,"

which contains the FFWCC Conditions of Certification. The Threatened and Endangered Species Plan does not include Conditions of Certification.

98. DEIS Appendix F-2, Section 5.7, Page 5-5, Lines 8-11: USFWS BA states: "Offsite activities would also affect storks, because the installation of a portion of the proposed transmission lines would occur within **1 mi of two active wood stork colonies and within 3 mi of two other colonies**. The transmission lines would also bisect the 18.6 mi CFA of nine wood stork colonies." The language is correct for the West Preferred Corridor; however, it **does not reflect the location of the West Consensus Corridor (MDLPA 2 Corridor)** which is located outside the recommended management zones. DEIS reference, (FPL2013-TN2941), Section "Threatened and Endangered Species", page 9 states: "However, use of the MDLPA 2 Corridor reduces the probability of potential impacts to the federally endangered wood stork (*Mycteria americana*) and Everglade snail kite (*Rostrhamus sociabilis plumbeus*). The wood stork is known to nest in four colonies both south and north of Tamiami Trail and west of the West Preferred Corridor. These colonies have been well documented for years and are known as the Tamiami East 1 and 2, Tamiami West, and 3B Mud East colonies [South Florida Water Management District (SFWMD), 2013]. The **MDLPA 2 Corridor is located east of all these known colonies, and the closest colony (Tamiami East 1) is 0.86 mile away**. This distance falls outside the recommended primary (500-1500') and secondary (2500') management zones ..." (emphasis added)
99. DEIS Appendix F-2, Section 5.7, Page 5-5, Lines 14-16: USFWS BA states: "The FFWCC requires FPL to conduct flight surveys of the two known wood stork nesting colonies to determine the flight corridors of fledging wood storks before and after transmission-line installation (FPL 2011-TN1283)." The reference is incorrect in this section. FPL 2011-TN1283 references the "FPL Turkey Point Units 6 & 7 Threatened and Endangered Species Evaluation and Management Plan". The correct reference is the Conditions of Certification (**State of Florida 2014-TN3637**). (emphasis added)
100. DEIS Appendix F-2, Section 5.7, Page 5-5, Lines 14 - 25: USFWS BA states, "The FFWCC requires FPL to conduct flight surveys of the two known wood stork nesting colonies to determine the flight corridors of fledging wood storks before and after transmission-line installation (FPL 2011-TN1283)." Line 23 states: "FPL would also have to conduct post-building monitoring during the breeding season after transmission-line installation near wood stork colonies." FFWCC Conditions of Certification states: "The FFWCC requires FPL to conduct flight surveys of the two known wood stork nesting colonies to determine the flight corridors of fledging wood storks before transmission-line installation. **For the West Preferred Corridor**, FFWCC also requires FPL to conduct flight surveys of the two known wood stork nesting colonies **after** transmission-line installation." In addition, "FPL would also have to conduct post-building monitoring during the breeding season after transmission-line installation **within 0.5 mi of wood stork colonies**." (FPL 2011-TN1283)." (emphasis added)

101. DEIS Appendix F-2, Section 5.14, Page 5-13, Lines 23-25: USFWS BA states: "Almost 62 ac of land were classified as Brazilian pepper within the second leg of the preferred route of the West transmission-line corridor that would span between the Clear Sky and Levee substations." For consistency in this section, also include the **Brazilian pepper acreage** in the 2nd leg of Clear Sky to levee for the West Consensus Corridor. From the Proposed Turkey Point, Units 6 & 7 "Supplemental Transmission Corridor Information for the Combined License Application Part 3 – Environmental Report"; DEIS reference (FPL2013-TN2941), Section "Land Use", Table 2 "Major Land Use Acreages Along the Entire West Consensus Corridor", page 6 shows: **44.82 acres (approximately 45 acres)**. (emphasis added)
102. DEIS Appendix F-2, Section 6.1, Page 6-2, Lines 20-22: USFWS BA states: "As previously noted, this sanctuary would be located **south and west** of the existing IWF in an area adjacent to the Sea Dade Canal (FPL 2012-TN1618)." Turkey Point Units 6 & 7, Transmittal of Federal Biological Assessment for Six Listed Species dated November 2012, DEIS reference (FPL 2012-TN1618), Subsection 6.2.1.5 "Units 6 & 7 Crocodile Conservation and Monitoring Plan", page 77 states: "...and construction of an additional crocodile nesting and foraging sanctuary (Sea Dade Canal Crocodile Sanctuary) **south** of the industrial wastewater facility within the EMB." (emphasis added)
103. DEIS Appendix F-2, Section 6.1, Page 6-2, Lines 26-28, 31: USFWS BA states: "FPL predicted that the increase in capacity derived from the NRC-approved uprate of Units 3 and 4 (77 FR 20059) (TN1001) would increase water temperatures within the cooling canals by **2°F** and increase salinity by **2–3 ppt** (FPL 2014-TN4058)." ER Section 5.11.2.1, states: "The uprated Units 3 & 4 would have an increased thermal discharge into the cooling canals of a **maximum of 2.5°F** and would increase salinity by **6 percent**." Two different temperatures are referred to—one within the cooling canals and one for the discharge into the cooling canals. (emphasis added)
104. DEIS Appendix F-2, Section 6.1, Page 6-2, Lines 40-41: USFWS BA states: "Unit 5 also uses **freshwater** mechanical draft cooling towers to dissipate heat." ER Rev. 6, Subsection 2.3.1.2.2.4 "Hydrogeochemical Characteristics", page 2.3-35 states: "Although the Upper Floridan aquifer is a major source of potable groundwater in much of Florida, water withdrawn from the unit in southeastern Florida, including Miami-Dade County, **is brackish and variable with chloride and dissolved solid concentrations greater than 1000 mg/L**. Groundwater samples from the Upper Floridan aquifer production wells at Unit 5 (Table 2.3-22) show an average chloride concentration of **2900 mg/L**." (emphasis added)
105. DEIS Appendix F-3, Subsection 3.1.1.2, Page 3-6, Line 14-16: NMFS BA states, "These pipelines would be routed from the Turkey Point peninsula along the existing berm east of the plant area, **and be situated above ground** (Figure 3-3)." ER Subsection 3.9.1.7 states: "The pipelines from the radial collector wells would require excavation on the Turkey Point

peninsula and the existing berm east of the plant area, **but would be above ground on the plant area.**" (emphasis added)

106. DEIS Appendix F-3, Subsection 4.1.2.2, Page 4-4, Lines 15-19 and Appendix F-4, Section 5.3, Page 5-6, Lines 24-26: NFMS BA states, "the current deliveries will likely decrease significantly, but during the 6-year construction period, **approximately 80 additional deliveries of construction equipment and modules would occur** (FPL 2014-TN4058)." Similar language is found in Appendix F-4. ER Subsection 4.3.2.2.1 states: "The number of weekly shipments of fuel oil would not be expected to change; however, during the 6-year construction period, there would be approximately 80 additional barge trips for delivery of construction equipment and modules **per unit.**" (emphasis added)
107. DEIS Appendix F-3, Subsection 4.2.1, Page 4-6, Lines 31-33: NMFS BA states "With the exception of TDS, calculated depositional rates were very low, ranging from  $7.5 \times 10^{-10}$  to  $2 \times 10^{-7}$  g/m<sup>2</sup>-month." NMFS BA calculated depositional rates in Table 4-1 range from  $3.5 \times 10^{-10}$  to  $8.4 \times 10^{-7}$  g/m<sup>2</sup>-month. (emphasis added)
108. There are instances in DEIS Appendix F-3 that describe the possible impacts to aquatic species through impingement and entrainment if flow pathways occur through fracturing. For example DEIS Appendix F-3, Page 4-87, Line 5 states: "Operation of the RCW system to supply cooling water to proposed Units 6 and 7 could affect aquatic T&E species or their prey through impingement or entrainment if preferential flow pathways through the limestone above the well lateral occur through fracturing (i.e., frac-out)..." However, Conditions of Certification **require a reverse-flow scenario that will maintain control of the drilling water within the drill bore and within the caisson minimizing the potential for frac-outs.** "Should fracturing occur...FPL shall mitigate for adverse impacts to Biscayne Bay Aquatic Preserve and its aquatic resources that have been caused by the fracturing event." (emphasis added) Instances in the DEIS include:
- a. DEIS Appendix F-3, Subsection 4.2.2, Page 4-7, Lines 5-9
  - b. DEIS Appendix F-3, Subsection 4.2.2, Page 4-8, Lines 17-20
  - c. DEIS Appendix F-3, Subsection 4.2.2, Page 4-9, Lines 29-32
109. DEIS Appendix F-4, Subsection 2.3.1, Page 2-8, Lines 28-29 and Appendix F-4, Subsection 5.1.1, Page 5-2, Line 15-16: NMFS EFH (Subsection 2.3.1) states, "The RWTF would be located **west of the proposed units...**" Similar language is found in Appendix F-4 (Subsection 5.1.1). However, NMFS EFH Figure 2-2 shows the RWTF will be located **northwest of the proposed units.** (emphasis added)
110. DEIS Appendix F-4, Subsection 2.3.2, Page 2-9, Line 5: NMFS EFH states, "The maximum saltwater makeup-water rate under normal operating conditions would be approximately **43,200 gpm**, assuming 1.5 cycles of concentration in the cooling towers." ER Subsection



3.4.1.1.1 states, "The maximum saltwater makeup rate to the circulating water system would be approximately **43,200 gpm per unit.**" (emphasis added)

Appendix G – Supporting Documentation

111. DEIS Appendix G, Subsection G.2.1.4, Page G-7, Table G-3: DEIS Appendix G Table G-3 incorrectly states that the driller doses in ER Table 5.4-3 are for an **adult**. They are for a **child**, as indicated in the last paragraph of ER Subsection 5.4.1.1. The lower doses calculated by the Staff are for an adult, leading to the differences noted in Table G-3.(emphasis added)
112. DEIS Appendix G, Subsection G.2.2.4, Tables G-8 and G-9, Page G-12: DEIS Table G-8 lists **values** for the "FPL and NRC Staff Skin Dose (mrem/yr)" for Inhalation, Vegetable, and Meat. ER Table 5.4-7 reports "**0**" for each of the corresponding doses. Additionally, the "Total MEI Dose" via the Skin pathway by Inhalation reported in the DEIS for an adult is **0.0622 mrem/year** and is **0 mrem/year** in ER Table 5.4-7. This discrepancy also appears in DEIS Table G-9 in the 5th row. **DEIS Table G-9 reports** a Skin dose of **0.04 mrem/year for a child** via the Inhalation pathway, whereas the **ER reports 0 mrem/year for a child.**
113. DEIS Appendix G, Subsection G.2.2.6, Page G-14, Table G-11: DEIS Table G-11, "Calculated Doses to the Population Within 50 mi of the Turkey Point Site from Gaseous and Liquid Pathways (Two AP1000 Units)", contains calculated whole body doses by various pathways and reports the "FPL Estimate" for each cited pathway. The "FPL Estimate" contains a footnote which cites (FPL 2014-TN4058), FPL's ER Revision 6. However, the listed doses by pathway in Table G-11 that are attributed to the ER do not appear in the ER.
114. DEIS Appendix G, Subsection G.2.4.4, Page G-17, Table G-15: DEIS Table G-15, "Comparison of FPL and NRC Staff Estimated Gaseous Effluent Doses to Unit 7 Construction Workers," compares annual dose values by source. There are instances where the doses attributed to FPL are inconsistent with ER Table 4.5-4:
- a. For the "Units 3 and 4" source, the "Skin Dose" reported for FPL is **0.0022** mrem/yr. ER Table 4.5-4 reports this same dose as **0.0031** mrem/yr.
  - b. For the "Units 3 and 4" source, the "TEDE" reported for FPL is **0.0022** mrem/yr. ER Table 4.5-4 reports this same dose as **0.0023** mrem/yr.
115. DEIS Appendix G, Subsection G.2.5.3, Page G-19, Table G-18: DEIS Table G-18, "NRC Staff Estimate of Non-Human Biota Doses for Proposed Turkey Point Units 6 and 7 for One Unit", presents estimates of non-human biota doses expressed as annual absorbed dose. For consistency with DEIS Table G-19, these doses should be expressed as daily absorbed dose.
116. DEIS Appendix G, Section G.3.1, Page G-22, Paragraph 2: The DEIS states: "FPL completed the pumped well on the Turkey Point peninsula as an open borehole **from 22 to 46 ft** below ground surface and with cemented casing above that depth. They also completed **five**

**observation wells** with the top of the **open interval at a depth of 22 ft in each well**, and the bottom of the **open interval at depths varying between 41 and 46 ft.**" This discussion of the monitoring wells used in the aquifer pumping test is inconsistent with the description in the ER Subsection 2.3.1.2.2.3, page 2.3-30 and the cited reference (FPL 2009-TN1263). **ER 2.3.1.2.2.3 states 7 observation wells** at distances of **925 ft to 2704 ft away** from the pumped well.

117. DEIS Appendix G, Subsection G.3.2.1, Page G-28: Subsection "Model Results-Radial Collector Wells": There are instances in this subsection where the values, which describe the results presented in the FSAR Table 2CC-211, are consistent with an earlier revision of FPL's FSAR Table 2CC-211 but are inconsistent with FPL's FSAR Table 2CC-211 Revision. These instances include (emphasis added):
- The DEIS states: "Only **0.3 percent** of the water produced was predicted by the base case model..." The FSAR reports base case percentage as **0.2 percent**.
  - The DEIS states: "This "worst-case" analysis predicted that **1.5 percent**...from the Biscayne aquifer." The FSAR reports worst case percentage as **1.4 percent**.
  - The DEIS states: "The base case model predicted that **1.9 percent**...A "worst" case of **3.3 percent** of the extracted water coming from the industrial wastewater facility..." The FSAR reports base case percentage as **2.0 percent** and the worst percentage is **3.2 percent**.
118. Appendix G, Subsection G.3.2.1, Page G-29: Subsection "Assessment – Radial Collector Wells": Page G-29, 2nd to last paragraph, first line: The DEIS states: "FPL's base case model predicted that **1.9 percent** of the water extracted by the RCW would come from the industrial wastewater facility." FSAR Table 2CC-211 reports the percentage as of RCW flow originating from the industrial waste facility as **2.0 percent**.(emphasis added)
119. Appendix G, Subsection G.3.2.1, Page G-30: Subsection "Model Results-Inflow to Power Block Excavations": The DEIS states: "The FPL model predicted that pumping rates of **140 and 136 gpm** would be necessary for dewatering the excavations at Units 6 and 7, respectively." These values have been updated. Revision 6 of the ER, Subsection 4.2.1.1.1, and FSAR Appendix 2CC Section 9.0, states the excavation dewatering pumping rates as **96 gpm** for each of the two units. (emphasis added)
120. Appendix G, Subsection G.3.2.2, Page G-33: Subsection "Numerical Modeling": The DEIS states (last paragraph of page G-33): "...the total RCW pumping rate was set to **470,965** cubic meters per day ( $m^3/d$ ) (**86,400 gpm**)..." However, according to cited reference, USGS document "Estimated Effects of Proposed Radial Collector Well Pumpage Near Turkey Point Nuclear Facility, Miami-Dade County, Florida. (NRC 2014-TN3078, page 9): "The total rate of pumping...is **490,536**  $m^3/d$  or approximately **90,000 gallons per minute (gal/min)**." These values should be reconciled for consistency. (emphasis added)

121. Appendix G, Subsection G.3.3.2, Page G-49, Lines 6-7: The DEIS states: "...using the maximum MCU hydraulic conductivity from the range of values shown in Table G-25..." Table G-25 only shows one value for hydraulic conductivity. Table G-24 contains hydraulic conductivity values for the MCU.

Appendix H – Authorizations, Permits and Certifications

No comments

Appendix I – The Effect of Climate Change on the Evaluation Environmental Impacts

No comments

Appendix J – Greenhouse Gas Footprint Estimates For a Reference 1,000 MW(E) Light-Water  
Reactor

No comments