

## **PMTurkeyCOLPEm Resource**

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**From:** Williamson, Alicia  
**Sent:** Friday, October 23, 2015 12:29 PM  
**To:** Orthen, Richard (Richard.Orthen@fpl.com)  
**Subject:** Draft RAIs to support TP final EIS  
**Attachments:** 102315 Final TP Aquatic RAIs.docx; 102315 Turkey Point Draft RAI-hydro.docx; 102315 draft RAI terrestrial.docx

Rick

Attached are the draft RAI's as promised. The next step is to set up clarification calls to discuss.

I'll send you a couple of date and times the staff is available.

Thanx

Alicia

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"Orthen, Richard (Richard.Orthen@fpl.com)" <Richard.Orthen@fpl.com>  
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MESSAGE	407	10/23/2015 12:28:00 PM
102315 Final TP Aquatic RAIs.docx	23750	
102315 Turkey Point Draft RAI-hydro.docx	21879	
102315 draft RAI terrestrial.docx	21892	

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<i>Item Number</i>	<i>ESRP/ER Section</i>	<i>RAI</i>	<i>Full Text (Supporting Information)</i>
<b>Aquatic Ecology (AE)</b>			
<b>fAE-1</b>	ESRP 2.4.2  10 CFR 51.71(d)	Provide information on the results of a benthic habitat (including seagrass) and species survey for the marine environment around the proposed RCW installation and operation area. Please include a copy of the "Land-Based Mesocosm Project to Evaluate Potential Radial Collector Well Impacts to Seagrass, Atkins, April 2013" study that was reference in the DEIS DOI EPA Comment Letters Observations, Attachment 1 Page 71 of 92.	Staff requires this information to characterize the baseline conditions that exist for seagrass and benthic species populations living in the marine environment adjacent to the Turkey Point property in the area of the proposed RCW.
<b>fAE-2</b>	ESRP 5.3.2  10 CFR 51.71(d)	Provide additional information on the placement and management of excavated muck to be placed on the IWF berms. Include information on methods for preparation prior to placement such as trenching to a specified depth, use of containment such as a liner, and management of stacked muck to prevent erosion, access for nesting by American crocodiles, or displacement of muck into the IWF canals.	Staff requires this information to assess changing environmental conditions to the protected American crocodile following placement of excavated muck.

## Turkey Point Draft RAI-Hydrology

1. The NRC staff needs to understand how the recent changes in the operation of the IWF (Industrial Wastewater Facility) may change the environmental baseline of the affected environment in the vicinity of Units 6 and 7.

Though the staff understands that the annual Extended Power Uprate Monitoring report will not be submitted to the Florida Department of Environmental Protection until spring 2016, the staff requests currently available data of recent conditions of the IWF and associated monitoring wells, including water levels, water temperature, salinity, water quality parameters, tritium concentration, and turbidity, since May 31, 2014. Provide the existing data on past pumpage rates from various sources, including the freshwater canals and wells in the Biscayne or Upper Floridan aquifers associated with the IWF. Further, please provide a reasonable range of future pumpage rates from these sources. Also, provide flowrates and temperature changes at the intakes and discharges in the IWF since May 2014. Please include any data from before June 2014 that had not been included in the 2014 report.

The staff is requesting this information under the authority of 10 CFR 51.41 in order to fulfill the NRC's responsibilities under the National Environmental Policy Act of 1969 and to inform the final environmental impact statement.

## Turkey Point Draft RAIs-Terrestrial Ecology

1. Findings of Fact #187 of the Conditions of Certification issued by the Siting Board on 5/19/14 states development of roads and pipeline corridors would impact 69 acres of Florida panther habitat within the USFWS Panther Focus Area with a value of 297 Panther Habitat Units. Habitat loss, degradation, and fragmentation have been identified in the USFWS Florida Panther Recovery Plan (3rd revision dated 1 November, 2008) as the greatest threat to panther survival. Findings of Fact 605 of the same Conditions of Certification states “any loss of wood stork foraging habitat will be fully mitigated”. Section C: Specific Conditions – Transmission Lines within the Conditions of Certification issued by the Siting Board on 5/19/14 requires the Licensee provide a calculation of wood stork foraging habitat loss based on the application of the USFWS Habitat Assessment Foraging Model and a mitigation plan (pg. 717). Although the use of the West Consensus corridor may reduce impacts to stork foraging habitat, it does not eliminate them. As the ER Rev. 6 states the west transmission corridors occur within the core foraging areas of 9 wood stork colonies (pg 4.3-14). Please provide a draft or final wildlife habitat mitigation plans that accounts for impacts to wildlife habitat (Florida panther, wood stork foraging, and migratory birds) from the proposed Units 6 & 7 construction, operation, and maintenance.
2. Please provide an estimate of actual impact extent using Level III FLUCFCS codes within each proposed offsite transmission line, access road, and pipeline corridor. Please include a quantification of temporary and permanent impacts and describe the timeframe that FPL is using to define “temporary.”
3. Please provide a wetland functional loss assessment (including acreage data and UMAM scores) for each wetland cover type within the West Consensus transmission corridor by segment (1A, 1B, 1C, 1D, 2, 3A, 3B, 3C, 4, 5A, 5B, 6) and within the Tamiami Trail and Krome Ave access road corridors. Currently wetland acreage is presented only as a sum, and UMAM scores are presented only as averages within Table 2-5 of the Turkey Point Units 6 & 7 Mitigation Plan Rev. 2 dated July 2011 (093-87652).
4. Please provide a wetland functional assessment (including acreage data and UMAM scores) for the reclaimed water pipeline restoration areas depicted in Figure 2.2-3 of the Environmental Report Revision 6.
5. Please provide a description of specific measures (i.e. best management practices) that would be employed during the construction and operation of the West Transmission Line to minimize impacts to federally listed species and their habitats within the King’s Highway Rockland.
6. Please provide any bird use survey methods and results conducted on the Units 6&7 Plant area Mud Island, including presence and abundance of red knots.
7. Please provide any proposed plans for maintenance or restoration of the main construction access road once the proposed facilities are constructed.