

PMTurkeyCOLPEm Resource

From: Williamson, Alicia
Sent: Tuesday, January 12, 2016 1:57 PM
To: Orthen, Richard (Richard.Orthen@fpl.com)
Subject: Supplemental Site Audit Plan
Attachments: 011216 Supplemental Site Audit Plan Turkey Point Jan 2016 final.pdf

Rick

Attached is the site audit plan for the upcoming audit. The document will be publicly available today. Please let me know if you have any questions.

Thanx

Alicia

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**January 2016 Execution Plan for the
Turkey Point Units 6 & 7 COL
Supplemental Environmental Site Audit**

January 26-27, 2016



_____/RA/_____
Environmental Project Manager

1/12/16 _____
Date

_____/RA/_____
DNRL Manager

1/12/16 _____
Date

1. Project Description

The combined license (COL) application for construction and operation of two AP1000 reactors at Turkey Point site near Homestead, Florida was submitted by Florida Power & Light Company (FPL) to the NRC on June 30, 2009. As part of the review of the COL application, the NRC is preparing an environmental impact statement (EIS). The U.S. Army Corps of Engineers, Jacksonville District, Miami Field Office (USACE) and the National Park Service (Biscayne Bay and Everglades) are cooperating agencies with the NRC in preparing the EIS. The draft EIS was published in February 2015 and the staff anticipates the final EIS will be published in October 2016.

2. Audit Basis

Section 102 of the National Environmental Policy Act (NEPA) of 1969, as amended (42 USC 4321 et seq.) directs that an EIS be prepared for major Federal actions that significantly affect the quality of human environment. The NRC implements Section 102 of NEPA through its regulations in 10 CFR Part 51. Further, in 10 CFR 51.20, the NRC has determined that the issuance of a COL under 10 CFR Part 52 is an action that requires an EIS. As part of the review of this COL application, the NRC staff is preparing an EIS. This supplemental audit will assist the staff in determining whether new required mitigation measures put in place by local regulatory agencies are significant new circumstances bearing on proposed Units 6 and 7 or their impacts, which are described in the staff's draft EIS, published in February 2015 (ADAM accession number ML15055A103 and ML15055A109). In addition, the audit will assist the staff in responding to stakeholder comments on the draft EIS regarding the mitigation.

Audit Scope and Objectives

During the summer of 2014, the Turkey Point Units 3 & 4 cooling canal system (CCS) experienced an algal bloom as well as an increase in water temperature and increases in other significant parameters (e.g., salinity, nitrogen concentration). These changes are thought to stem from below average rainfall in the area. As a result, FPL applied for and was granted several emergency permits from the Florida Department of Environmental Protection (FDEP) to eliminate the algae bloom, reduce the CCS temperatures, as well as improve water quality of the CCS. The NRC also granted FPL's request for an amendment associated with these matters. As part of these emergency actions, FPL proffered several permanent mitigation measures to "freshen" the CCS and reduce the risk of this type of event from occurring again. In addition, on December 23, 2014, FDEP issued an administrative order requiring FPL to reduce and maintain the salinity at or below an annual average salinity of the CCS to 34 psu (practical salinity units). Furthermore, on October 6, 2015, FPL signed a Consent Agreement with Miami-Dade County through its Department of Regulatory and Economic Resources, Division of Environmental Resources Management (DERM) to undertake a number of activities that would address the water quality impacts associated with the CCS adjacent to the Turkey Point site. These new mitigation measures to reduce the salinity could change the existing environment described in Section 2.3.1 of the staff's draft EIS for Units 6 & 7. Therefore, the staff considers this information to be new and potentially significant.

As a result, the staff needs to review and evaluate hydrology, water quality, and aquatic and terrestrial biological resources to determine if additional information is needed to complete its

environmental review and/or if these required new measures could alter conclusions documented in staff's draft EIS.

3. Information and Other Materials Necessary for the Audit

NRC staff and contractors should review the following documentation prior to the audit

- Review applicable Environmental Standard Review Plan (ESRP) sections
- Review December 23, 2014 Florida Department of Environmental Protection Administrative Order to FPL regarding submittal of a Cooling Canal System Salinity Management Plan (Accession No. ML15026A548)
- Review October 6, 2015 Consent Agreement between FPL and Miami-Dade County's DERM regarding CCS Salinity Management (Accession No. ML16004A241)

Team Assignments

Audit Area	Staff
Project Management	Alicia Williamson- NRC Bob Bryce – PNNL Sandi McInturff - PNNL
Hydrology	Mohammad Haque – NRC Dan Barnhurst – NRC Lance Vail – PNNL Paul Thorne – PNNL
Ecology	Michael Masnik
USACE	Megan Clouser
NPS	Sarah Bellmund Joan Lawrence

5. Sites Audit Schedule

The audit schedule is attached to this plan in Appendix A.

6. Deliverables

The primary deliverable for this audit will be a site audit summary. If the need for additional information is determined, it will be documented in the site audit summary.

7. Product

The staff will issue a site audit summary. If any additional information is necessary or docketed as a result of the audit, the staff will incorporate the information in its EIS as appropriate.

APPENDIX A

Turkey Point January 2015 Supplemental Audit Schedule

Monday, January 25, 2016

Travel Day to Miami, FL

Tuesday, January 26, 2016

9:00 a.m. – 1:00 p.m. Meeting with Miami-Dade County

1:00 p.m. – 3:00 p.m. Lunch and Travel to Everglades National Park

Wednesday, January 27, 2016

9:00 a.m. – 12:00 p.m. Travel to Turkey Point Site to Land Utilization Building
Meet with FPL on Audit Information Needs

12:30 p.m. – 1:00 p.m. Summary and Conclude Discussion

1:00 p.m. – 3:00 p.m. Lunch and Travel Back to Hotel

Thursday, January 28, 2016

Travel Day

APPENDIX B

Audit Information Needs

**Information Needs for January 2016
Supplemental Turkey Point Site Audit**

1. Have a subject matter expert familiar with the development of the consent agreement available who can discuss the communication FPL has had with agencies regarding the consent agreement.
2. Have a subject matter expert available who can describe the range of possible approaches considered to achieve the outcome the county seeks through the consent agreement (pumping hypersaline plume, etc).
3. Have a subject matter expert available who can discuss any completed or ongoing modeling efforts being performed to support implementation of the consent agreement.
4. Have a subject matter expert available who can describe any adaptation plans relative to achieving the objectives of the consent agreement (will there be measures for detection of pre-determined environmental conditions that would cause FPL to revise the mitigation plans).
5. Have a subject matter expert available who can discuss the current water quality conditions in cooling canal system and ongoing salinity mitigation plans (independent of consent agreement).
6. Have a subject matter expert available who is prepared to answer questions on the content of the December RAI response related to how the recent changes in the operation of the cooling canals may change the environmental baseline of the affected environment in the vicinity of Units 6 and 7.