

## PMLevyCOLPEm Resource

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**From:** Habib, Donald  
**Sent:** Tuesday, February 23, 2016 8:14 AM  
**To:** PMLevyCOLPEm Resource  
**Subject:** FW: New Pipeline near Levy  
**Attachments:** NPD-MISC-2014-009.pdf

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**From:** Kitchen, Robert H [mailto:Robert.Kitchen@duke-energy.com]  
**Sent:** Tuesday, February 23, 2016 8:08 AM  
**To:** Habib, Donald <Donald.Habib@nrc.gov>  
**Cc:** Snead, Paul <Paul.Snead@duke-energy.com>; Cross-Dial, Andrea <Andrea.Cross-Dial@duke-energy.com>  
**Subject:** [External\_Sender] New Pipeline near Levy

Don – You asked about the gas line that is planned near the Levy site. We reviewed this as part of our New & Significant process in support of Levy FEIS and discussed with NRC Environmental auditors during the audit on 2/10/16. See attached letter to the Corps from 2014 where we discussed the proposed Sabal Trail gas pipeline to the Citrus Combined Cycle plant near Crystal River site. See yellow highlighted section that notes that this pipeline will be 7 to 8 miles away from the Levy site.

There are 3 natural gas pipelines located within 5-miles distance of the Levy site. Those pipelines are described and evaluated as potential offsite hazards to Levy Safety Related structures in Levy FSAR 2.2.2.3. Regulatory Guide 1.206 Section C.I.2.2 requires “all facilities and activities within 5 miles (8.05 km)... and include facilities and activities at greater distances as appropriate based on their significance.” Since 3 natural gas pipelines are described as located within 5-miles (actual distance evaluated is just over 1 mile), there is no need to discuss other pipelines beyond 5-miles.

Let us know if you have additional questions.

**Levy Nuclear Plant Units 1 and 2  
COL Application  
Part 2, Final Safety Analysis Report**

**2.2.2.3 Description of Pipelines**

Based on information from the EDR, no petroleum pipelines are present within the 8-km (5-mi.) radius of the LNP site ([Reference 2.2-208](#)). Three underground natural gas pipelines are located on the eastern side of U.S. Highway 19 alongside the remaining rail bed from the abandoned railroad track. The pipelines run parallel to U.S. Highway 19, approximately 1769 m (5803 ft.) to the west-northwest of the LNP site.

The three natural gas pipelines consist of 20.3-centimeter (cm) (8-inch [in.]), 76.2-cm (30-in.) and 91.4-cm (36-in.) diameter pipe, which are owned by FGT. The 20.3-cm (8-in.) pipeline is buried to a minimum of 0.9 meters (m) (3 feet [ft.]) below ground surface (bgs), and is 2123 m (6966 ft.) west of the LNP site. The pipeline has a maximum pressure of 912 pounds per square inch (psi). The 76.2-cm (30-in.) pipeline is buried a minimum of 0.9 m (3 ft.) bgs. The pipeline has a maximum pressure of 1200 psi and is located 1769 m (5803 ft.) west-northwest of the LNP site. The 91.4-cm (36-in.) pipeline is buried a minimum of 0.9 m (3 ft.) bgs. The pipeline has a maximum pressure of 1333 psi and is located 1757 m (5763 ft.) west-northwest of the LNP site. There are no plans to carry any other product in the pipelines except for natural gas. The locations of the 20.3-cm (8-in.), 76.2-cm (30-in.), and 91.4-cm (36-in.) pipelines with respect to the safety-related structures of the LNP are shown in [Figure 2.2.2-202](#).

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**Email Number:** 1319

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**Received Date:** 2/23/2016 8:13:39 AM  
**From:** Habib, Donald

**Created By:** Donald.Habib@nrc.gov

**Recipients:**  
"PMLevyCOLPEm Resource" <PMLevyCOLPEm.Resource@nrc.gov>  
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COL Application  
Part 2, Final Safety Analysis Report**

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Serial: NPD-MISC-2014-009  
June 24, 2014

Mr. Gordon Hambrick  
Senior Project Manager  
Department of the Army  
Jacksonville District Corps of Engineers  
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Panama City, FL 32405

**LEVY NUCLEAR PLANT, UNITS 1 and 2/DUKE ENERGY  
SAJ-2008-00490 (IP-GAH)**

**RESPONSE REGARDING CUMULATIVE IMPACTS FROM LEVY FEIS**

Dear Mr. Hambrick:

At our meeting on March 18, 2014, you requested that Duke Energy Florida (DEF) provide updates and revised analyses for cumulative impacts taking into consideration:

- the decommissioning of Crystal River Unit 3,
- the construction and operation of a new natural gas-fueled generating plant adjacent to the existing Crystal River Energy Complex (CREC), and
- a natural gas pipeline to be licensed, constructed, and operated by Sabal Trail Transmission to serve the new plant.

The attached response focuses on these and also includes consideration of related changes to energy projects that have been identified since the publication of the Final Environmental Impact Statement (FEIS), such as the decision to retire Crystal River coal-fired units 1 and 2 earlier than planned. The attachment summarizes the impacts of these new and changed energy projects on the cumulative impacts analyses discussed in FEIS Chapter 7 including those sections of particular interest to the Corps. The attached analysis shows that inclusion of the above changes in nearby energy projects does not alter the conclusions of the cumulative impacts analyses presented in FEIS Chapter 7.

If you have any questions regarding this response, please contact Paul Shead at 980-373-2854.

Sincerely,

Robert Kitchen  
Director – Nuclear Licensing  
Nuclear Development

Attachment: Response to Corps Request Regarding Cumulative Impacts from FEIS

cc: Osvaldo Collazo, USACE  
Mallecia Sutton, USNRC

bc: Christopher Fallon, VP- Nuclear Development  
Robert Kitchen, Director, Nuclear Development Licensing  
Tillie Wilkins, ND-Licensing  
John Thrasher, Director - Nuclear Development Engineering  
Paul Snead, Manager – Siting and Licensing Support  
Amy Dierolf, Siting and Licensing Support  
Frank Matthews – Hopping, Green & Sams  
Jim Wells, Associate General Counsel, Duke Energy  
Kate Nolan, Associate General Counsel, Duke Energy  
ND Document Inbox (File & Records)

### **Response to Corps Request Regarding Cumulative Impacts from FEIS**

Since the Final Environmental Impact Statement for Combined Licenses (COLs) for Levy Nuclear Plant Units 1 and 2 (NUREG-1941) was published in April 2012 some changes in the present and reasonably foreseeable future energy projects in the vicinity of the Levy site have occurred that do not directly significantly impact the Levy Project. Duke Energy Florida (DEF) reviews these and other changes to determine if they pose potential significant information associated with the Final Environmental Impact Statement (FEIS) that could possibly affect the conclusions in the FEIS. No such change has been deemed to pose significant information that could possibly affect the FEIS conclusions.

The Corps noted that the cumulative impacts chapter of the FEIS:

- 1) assumed CREC 3 to be back on-line, and thus does not address CREC 3 shutdown,
- 2) does not address a new gas-plant at CREC, and
- 3) does not address the Citrus County gas pipeline.

To address the Corps' request, DEF provides the following updates and discussion of the analyses for cumulative impacts taking into consideration the decommissioning of CREC 3, the construction/operation of a new natural gas-fueled generating plant near CREC, and the proposed gas pipeline to CREC. This also provides an update of DEF's intent to retire Crystal River coal-fired Units 1 & 2 when the new combined-cycle plant becomes operational.

#### Shutdown of Crystal River Nuclear Plant Unit 3 and Coal Units 1 & 2

On February 5, 2013, DEF announced that it was going to retire the Crystal River Nuclear Plant (CR3). The plant had been shut down since late 2009, when delamination in the outer layer of the containment building's concrete wall occurred during a maintenance outage. The process of repairing the damage and restoring the unit to service resulted in additional delamination in other sections of the containment structure in 2011. During the ensuing months, DEF evaluated the ability to successfully repair the unit, the risks associated with any repair and the repair scope as well as the likely costs and schedule. A report completed in late 2012 confirmed that repairing the plant was a viable option but that the nature and potential scope of repairs brought increased risks that could raise the cost dramatically and extend the schedule. Ultimately, DEF decided that retiring CR3 was in the best overall interests of its customers, investors, and the state of Florida. The license renewal and uprate of CREC nuclear Unit 3 have been cancelled due to the unit's decommissioning.

On May 13, 2014, DEF announced its intent to also retire Crystal River coal-fired Units 1 and 2 (Crystal River Units 1 and 2) due to changing federal environmental regulations. The promulgation of the Mercury and Air Toxics Standards (MATS) by EPA in April of 2012 presented new environmental requirements for the DEF units at Crystal River. Crystal River Units 1 and 2 are not capable of meeting the emissions requirements for MATS in their current configuration and using the current fuel. In addition, under the terms of the revised air permit, in accordance with the State Implementation Plan for compliance with the requirements of the Clean Air Visible Haze Rule, these units are required to cease coal fired operation by the end of 2020 unless scrubbers are installed prior to the end of 2018. DEF has received a one year extension of the deadline to comply with MATS for Crystal River Units 1 and 2 from the Florida Department of Environmental Protection. This extension was granted to provide DEF sufficient time to complete projects necessary to enable interim operation of those units in compliance



with MATS during the 2016 – 2020 period. DEF anticipates burning MATS compliant coals in Crystal River Units 1 and 2 beginning no later than April 2016. Although specific dates have not been finalized, DEF anticipates retiring the Crystal River Units 1 and 2 in 2018 in coordination with the proposed 2018 Citrus Combined Cycle operations.

The shutdown of Crystal River Nuclear Plant Unit 3 and the anticipated shutdown of coal Units 1 and 2 does not change any of the cumulative impact conclusions reached in the Final Environmental Impact Statement. Cumulative impacts may result when the environmental effects associated with the proposed action are compounded with temporary or permanent effects associated with past, present, and reasonably foreseeable future projects. The shutdown of Unit 3 and the forecast for shutdown of Units 1 and 2 generally reduce environmental impacts when coupled with the construction and operation of LNP.

The major impact anticipated would be to changes in the dilution calculations for LNP effluent blowdown into the CREC discharge canal. DEF developed analyses to evaluate impacts to the environment and determine if prior analyses supporting the LNP Combined Operating License application are still bounding considering the current and eventual shutdown of the CREC units. DEF simulated the changes to the salinity and temperature characteristics of the discharge plume resulting from two scenarios, the decommissioning of CR3 only and the decommissioning of CREC Units 1, 2, and 3. The newly simulated salinity and temperature distributions in the Gulf of Mexico are used to evaluate impacts to the environment, and whether previous analyses are still bounding considering the decommissioning of CREC Unit 3. DEF also evaluated the impact of a change in the dilution factor used to calculate radiological impacts due to radioactive liquid waste pathway releases during normal operation. The decreased dilution factor, based on the elimination of dilution flows resulting from the decommissioning of CREC Units 1, 2, and 3, is used in analyses to assess compliance with regulatory requirements, specifically 10 CFR 50 Appendix I and 40 CFR 190. These DEF analyses were submitted to the US Nuclear Regulatory Commission by letter dated December 20, 2013 with serial number NPD-NRC-2013-045. These analyses concluded that a supplement to the FEIS does not appear necessary under 10 CFR 51.92 because the change in discharge salinity and temperature does not significantly change the results of the environmental review and because the change in dilution factor does not significantly change the results of the environmental review.

On December 2, 2013, DEF submitted a Post-Shutdown Decommissioning Activities Report (PSDAR) to the Nuclear Regulatory Commission concerning the Crystal River Nuclear Unit 3 shutdown. This PSDAR includes a discussion that provides the basis for concluding that the environmental impacts associated with decommissioning activities will be bounded by appropriate, previously issued, environmental impact statements. The discussion is based on two previously issued environmental impact statements:

1. NUREG-0586, "Final Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities: Supplement 1, Regarding the Decommissioning of Nuclear Power Reactors," Final Report (Referred to as the GEIS).
2. NUREG-1496, "Generic Environmental Impact Statement in Support of Rulemaking on Radiological Criteria for License Termination of NRC-Licensed Nuclear Facilities".

In evaluating whether the impacts in these previously issued environmental impact statements are bounding, information from NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants, Supplement 44, Regarding Crystal River Unit 3 Nuclear Generating Plant," Draft Report for Comment (Referred to as the DSEIS) was also considered. For each environmental impact standard in the GEIS, DEF concluded that the GEIS analysis bounds the impacts of decommissioning Crystal River Unit 3 on that standard. There were no unique site-specific features or unique aspects of the planned decommissioning identified that were not evaluated in the GEIS.

Since the environmental impacts associated with the site-specific decommissioning activities for Crystal River Unit 3 will be bounded by appropriate previously issued environmental impact statements, it is reasonable to conclude that the cumulative impacts from the decommissioning of CR Unit 3 associated with the LNP site will be no greater than those already evaluated by the FEIS with regard to the operation of the CR Unit 3. Also, the LNP FEIS had previously considered the eventual decommissioning of Crystal River Units 1 and 2 such that their accelerated decommissioning schedule does not significantly change the cumulative impacts considered in the FEIS.

FEIS Section 7.2, Water Use and Quality, considers the cumulative impacts of the existing CREC units, a planned uprate of Unit 3 and the potential decommissioning of CREC Units 1 and 2. As noted earlier, Unit 3 will not be operating in the future such that the planned uprate will not exist. The surface water impacts discussed in Section 7.2.1.1 will not be impacted due to a lesser draw on the unlimited supply of water from the Gulf of Mexico. Groundwater Use discussed in Section 7.2.1.2 would not be impacted due to the lesser volumes of groundwater needed by the site without Units 1, 2, and 3. Section 7.2.2.1, Surface-Water-Quality Impacts, would not be increased to any significant level. As noted in the FEIS, the discharge of LNP waters into the Gulf of Mexico would be permitted under new and existing NPDES permits and best management practices such that cumulative impacts would be acceptable. As discussed earlier, analyses of the impacts on salinity, temperature, and radioactive liquid releases have concluded that changes due to loss of dilution flow from Units 1, 2, and 3 would not be significant. The MODERATE surface-water-quality impacts from the CREC evaluated in the FEIS would be reduced due to the lesser surface water demands of fewer units at the complex and the incremental impacts from LNP would continue to be SMALL. The decommissioning of the three CREC units will lessen the potential for Groundwater-Quality impacts discussed in Section 7.2.2.2 and the cumulative impacts discussed in the FEIS would remain SMALL.

FEIS Section 7.3, Ecology, addresses the cumulative impacts on terrestrial and aquatic ecological resources. The decommissioning of the three CREC units would only reduce the potential for ecological impacts. The reduced reliance on once-through cooling flow due to the decommissioning of Units 1, 2, and 3 will improve the survivability of sea turtles in the intake canal and aquatic species due to reduced impingement and entrainment. The cumulative ecology impacts discussed in the FEIS will not be increased and will remain bounding.

FEIS Section 7.4, evaluates Socioeconomics and Environmental Justice cumulative impacts. Section 7.4.1 considers socioeconomic issues. Decommissioning of the CREC units and especially Unit 3 is expected to result in negative socioeconomic impacts. As the units transition from operating plants to shutdown plants and into the different phases of decommissioning, an overall decrease in plant staff will occur. The lost wages of these plant staff will result in decreases in revenues available to support the local economy and local tax authorities. Some laid-off workers may relocate, thus potentially impacting the local cost of housing and availability

of public services. The GEIS considered in the PSDAR concluded that socioeconomic impacts are neither detectable nor destabilizing and that mitigation measures are not warranted. DEF determined that the socioeconomic impacts of the shutdown of Unit 3 are bounded by the previously issued GEIS. Section 7.4.2 considers Environmental Justice issues. The FEIS notes that there are no disproportionately high and adverse impacts on minority and low-income populations. The decommissioning of the CREC units will affect the region equally such that no changes to the conclusions of the FEIS are needed.

FEIS Section 7.5, Historic and Cultural Resources, notes that historic and cultural resource impacts would be small and that mitigation may be warranted only in the event of an unanticipated discovery during any ground-disturbing activities associated with construction or maintenance of the operating facility. These actions would be determined by DEF in consultation with the Florida State Historic Preservation Office (SHPO). DEF's cultural resource management procedures would be followed if it encountered cultural resources during building and operation. These procedures apply to all of Duke Energy and would also be employed in the decommissioning of Crystal River Units 1, 2, and 3. Consequently, there would be no change to the cumulative impacts associated with historic and cultural resources described in the FEIS.

FEIS Section 7.6, Air Quality, already addresses the planned decommissioning of Crystal River Units 1 and 2 and the expected improvement in air quality from their decommissioning. Crystal River Unit 3 has minimal impact on air quality, such that the cumulative impact conclusions reached in the FEIS would not change.

FEIS Section 7.11.2, Transportation, expected that the decommissioning of Crystal River Units 1 and 2 would be after operation of the LNP and thus would not overlap with the construction of LNP. Since the decommissioning of the three Crystal River units is happening before LNP construction, there will still be no overlap such that the conclusions in the FEIS are still valid. The transportation impacts of decommissioning of Crystal River Nuclear Unit 3 were addressed in the PSDAR and are bounded by the previously issued GEIS. As noted in FEIS Section 7.11.3, Decommissioning, "the cumulative impacts of decommissioning the LNP site and CREC Unit 3 would be SMALL, and further mitigation would not be warranted."

#### New Natural Gas-fueled Generating Plant at CREC

In response to the projected retirement of Crystal River Units 1, 2, and 3, DEF is planning to develop the Citrus Combined Cycle (CCC) Project on 400 acres adjacent to the existing CREC. If all regulatory approvals are received, construction is expected to start on the new plant in early 2016. The plant's first 820 megawatts are expected to come online in spring 2018, and the second 820 megawatts are expected to be available by December 2018. DEF issued a Request for Proposal (RFP) on October 8, 2013 to seek competitive alternatives to the 2018 Citrus Combined Cycle project: bids to this RFP were closed on December 9, 2013. The purpose of the RFP was to solicit competitive proposals for supply-side alternatives to DEF's next planned generating unit. DEF's intent is to select resources that offer the maximum value, based on price and non-price attributes, to the Company's customers. During its normal course of business, DEF regularly evaluates resource alternatives to fulfill its need for long-term system resources. On May 13, 2014, DEF announced it had selected the self-build option as the most cost-effective option for customers that provides system-wide reliability, ensures regulatory compliance, and meets DEF's needed 2018 in-service construction timeline.

A summary of the proposed CCC project is:

<b>Project Name</b>	<b>Summary of Project</b>	<b>Location</b>	<b>Status</b>
Citrus Combined Cycle Generating Plant	DEF has proposed building a natural gas-fired combined-cycle plant with a capacity of approximately 1640 MW.	East of the existing CREC Units 4 and 5 about 9 mi southwest of the LNP site	Proposed. If regulatory approvals are received, expected to be in service in 2018. Submittal of permit applications is pending.

The permitting of the CCC plant will require site certification by the State under the Florida Power Plant Siting Act (PPSA) as well as a determination of need from the Florida Public Service Commission. Other major permits or approvals which will need to be obtained or modified include:

- Air Construction / Prevention of Significant Deterioration (PSD)
- National Pollutant Discharge Elimination System (NPDES) wastewater discharge and stormwater permits
- Site Certification under the PSPA is in lieu of separate state, regional, and local permits (Environmental Resource Permit, Water Use permit, etc.)
- Army Corps of Engineers permit for work impacting the discharge canal and the impact of wetlands under the jurisdiction of the Clean Water Act
- Land Use Approval from Citrus County

With the decommissioning of Crystal River Units 1, 2, and 3, 1730 MW of generating capacity would be removed from the Crystal River Energy Complex, but the CCC will add 1640 MW of generating capacity to effectively replace the lost capacity. There are advantages to construction and operation of the CCC, such as the replacement of two older coal-fired units with the cleaner natural gas fired combustion turbines of the CCC which will improve air quality. The CCC will also allow reuse of some of the existing infrastructure at the site. Also the three Crystal River units being retired are once-through cooling plants whereas the CCC will rely on closed cycle cooling reducing the demands on surface water use, and improving water quality

**FEIS Section 7.2, Water Use and Quality:** The CCC would have closed-cycle cooling, using cooling towers as opposed to the once-through cooling units being decommissioned at Crystal River. As such it would require many times less surface water during operation than the units they are replacing. Not only will less surface water use improve water quality, but all discharges from the CCC will be in accordance with the NPDES permit requirement ensuring acceptable water quality standards. Furthermore, the CCC will not require more groundwater resources than what is already permitted at the Crystal River Energy Complex. Consequently, the water use and quality impacts evaluated in the FEIS bound the impacts that will be evident from the CCC when it replaces the Crystal River units.

**FEIS Section 7.3, Ecology,** addresses the cumulative impacts on terrestrial and aquatic ecological resources. Terrestrial ecology surveys of the CCC construction site will ensure that impacts are avoided or minimized. An eagle's nest is already identified on the property and planning is underway to avoid any impact to it. The reduced reliance on surface water flow for the CCC will improve the survivability of sea turtles in the intake canal and aquatic species due

to reduced impingement and entrainment relative to the once-through cooling units that are being retired. The cumulative ecology impacts discussed in the FEIS will not be increased and will remain bounding.

FEIS Section 7.4, evaluates Socioeconomics and Environmental Justice cumulative impacts. The construction and operation of the CCC will have a positive socioeconomic impact. The construction of the CCC will provide jobs and require services for the construction workforce. Although the staffing for maintenance and operation of the CCC will not replace all the jobs lost due to the decommissioning of the three Crystal River units, it will be help in offsetting the decreases in revenues available to support the local economy and local tax authorities. Section 7.4.2 considers Environmental Justice issues. The FEIS notes that there are no disproportionately high and adverse impacts on minority and low-income populations. The benefits of the CCC will affect the region similarly such that no changes to the conclusions of the FEIS are needed.

FEIS Section 7.5, Historic and Cultural Resources, notes that historic and cultural resource impacts would be small and that mitigation may be warranted only in the event of an unanticipated discovery during any ground-disturbing activities associated with construction or maintenance of the operating facility. This would be true of the CCC where cultural resource surveys will be performed before construction. Any actions to avoid cultural resource impacts would be determined by DEF in consultation with the Florida State Historic Preservation Office (SHPO). DEF's cultural resource management procedures would be followed if it encountered cultural resources during building and operation. Consequently, there would be no change to the cumulative impacts associated with historic and cultural resources described in the FEIS due to the CCC.

FEIS Section 7.6, Air Quality: The replacement of two older coal-fired units with the cleaner natural gas fired CCC plant will improve air quality relatively. The CCC will have to meet air quality standards such that the cumulative impact conclusions reached in the FEIS would not change.

FEIS Section 7.11.2, Transportation: The construction of the CCC could have temporary impacts to traffic short-term, but the long term transportation impact from the operation and maintenance of the CCC is bounded by the impacts of the operation and maintenance of the Crystal River units that are being decommissioned but were already considered in the cumulative impacts of the FEIS.

### **Proposed Gas Pipeline to CREC**

Sabal Trail Transmission, LLC (Sabal Trail), a joint venture of Spectra Energy Corp and NextEra Energy, Inc., has been awarded a 474-mile interstate natural gas pipeline project by Florida Power & Light Company (FPL) to provide transportation services for their power generation needs beginning in May 2017. The Federal Energy Regulatory Commission (FERC) is the lead agency in reviewing the Project and has approved Sabal Trail to start a series of activities prior to filing a formal application for Project approval. This process is called the "Pre-file" process and the Project has been assigned a docket number of PF 14-1-000. Additional pipeline infrastructure will also benefit the Southeast region of the United States by making available additional supplies and new energy infrastructure to support other regional power generators and the growing demand for clean-burning natural gas. Sabal Trail will increase energy

diversity, security and reliability to these Southeast markets. The project includes construction of approximately 24 miles of 24-inch-diameter natural gas pipeline in Marion and Citrus Counties, Florida lateral from the mainline to provide natural gas to the new combined cycle project. The pipeline will be permitted, constructed, and operated by Sabal Trail.

A summary of the proposed gas pipeline to CREC is:

Project Name	Summary of Project	Location	Status
Sabal Trail Gas Pipeline into Citrus County	Sabal Trail Transmission, LLC has proposed building a lateral off its planned interstate natural gas-pipeline project that could supply needs for the CCC.	Approximately 7-8 mi south of the LNP site	Proposed. If built, expected to be in service in 2017 or later. Submittal of permit applications is pending.

The construction of the underground gas pipeline lateral would be of short duration, would be in conformance with regulatory and industry standards, and temporary in nature. The operation and maintenance of the pipeline would have minimal impact. Consequently there are no foreseeable cumulative impacts in FEIS Chapter 7 that would change due to the consideration of this gas pipeline lateral.