

September 7, 2017

Mr. Stan Austin, Regional Director  
United States Department of Interior  
National Park Service  
Southeast Regional Office  
Atlanta Federal Center  
1924 Building  
100 Alabama Street, S.W.  
Atlanta, Georgia 30303

Dear Mr. Austin:

The U.S. Nuclear Regulatory Commission (NRC) is in receipt of your letter dated December 19, 2016 regarding the final environmental impact statement (EIS) prepared in support of the environmental review of the Florida Power & Light Company (FPL) combined license (COL) application for Turkey Point Units 6 and 7 located near Homestead, Florida. The NRC staff published the final EIS in October 2016 and published a supplement to the final EIS in December 2016. The final EIS documents the NRC staff evaluation of the potential environmental impacts of the construction and operation of two new nuclear plants at the Turkey Point site. The evaluation was conducted in accordance with the National Environmental Policy Act of 1969, as amended (NEPA), Title 10 of the Code of Federal Regulations, Part 51, and the NRC's Environmental Standard Review Plan, NUREG-1555 (ESRP). The National Park Service (NPS) is a cooperating agency on the environmental review along with the U.S. Army Corps of Engineers-Jacksonville District (USACE or Corps). The NPS's participation in the environmental review was primarily centered on gathering data and sharing information regarding the environment in and around the Biscayne and Everglades National Parks and does not imply concurrence with the NRC staff's conclusions in the EIS. The NRC staff sincerely appreciates the NPS's participation as a cooperating agency throughout the environmental review process.

All of the comments received over the course of the review, either through the formal comment periods or through internal cooperating agency communications, were reviewed by the NRC staff and given serious consideration. Furthermore, the final EIS addressed comments received on the draft EIS, and the responses to those comments can be found in the final EIS in Appendix E (Volume 4). The high level of coordination with the NPS as well as other Federal, State, and local agencies regarding the environmental sensitivities in and around the proposed new units, including the National Parks, is evidenced by the level of detail addressed in the final EIS. In our view, all of this effort has resulted in an in-depth and complete analysis of the potential environmental impacts from construction and operation of Turkey Point Units 6 & 7. This letter addresses the concerns outlined in your letter at a high level. The primary concerns or topics included in your letter and addressed below include alternative sites, ground and surface water hydrology, hurricanes and flooding, transmission lines, and chemicals of emerging concern (CECs). The final EIS itself addresses the details identified in your letter in connection with these primary topics, and this letter does not repeat those details.

Your letter identified concerns regarding the EIS's analysis for several resource areas within the final EIS. This included the staff's analysis of alternative sites. Section 9.3 of the final EIS documents how the staff considered locating the proposed reactors at four alternative sites identified in the EIS. Staff's evaluation considered all the factors listed in the NPS's letter, except for those unrelated to the construction and operation of the new units. The staff evaluated the potential environmental impacts at proposed and alternatives sites in accordance with the guidance in NUREG-1555, the ESRP, and concluded that none of the alternative sites was environmentally preferable to the proposed Turkey Point site (Section 9.3). Additionally, in Section 9.2 of the final EIS, the approach used to evaluate energy alternatives is also based on the NRC ESRP and allows for a direct comparison.

Another resource area with which your letter identified concerns was the staff's analysis of the industrial waste facility (IWF) and potential impacts to the Biscayne National Park, as well as adjacent sensitive hydrological resources, including wetlands. Specifically, the letter expresses a concern with how the construction of Turkey Point Units 6 & 7, which would be surrounded by the IWF, would impact the surrounding area if a hurricane or major storm surge event were to occur. The IWF (or cooling canals) is used to support Turkey Point Units 3 and 4 and would not be used as a cooling water source for the new units. However, the staff did consider the impacts of the IWF in its cumulative impacts analysis (Section 7.3 of the final EIS). Additionally, in response to comments received on the draft EIS, the staff performed further groundwater modeling to assess the potential effects the hypersaline plume and operation of the radial collector wells could have on the surrounding hydrological environment (Sections 5.2 and G.3.2 of the final EIS), specifically those resources outlined in your letter. The additional analysis performed in support of the final EIS concluded that surface and groundwater impacts of the proposed plant would remain small. Additionally, the staff's Safety Evaluation Report (Agencywide Documents Access and Management System Accession No. ML16264A045) provided a detailed safety analysis and findings that the Turkey Point Units 6 & 7 would meet all of NRC's regulatory requirements related to hurricanes and potential storm damage. The staff's safety findings regarding hurricanes and flooding were also reviewed and deemed acceptable by the NRC independent Advisory Committee on Reactor Safeguards in September 2016.

Regarding your concerns related to transmission lines, the NRC staff believes the analysis is reasonable even in light of the April 20, 2016, Third District Court of Appeals of Florida decision regarding the Florida Siting Board's Final Order on Conditions of Certification, issued on May 19, 2014. The final EIS acknowledges the Florida's Siting Board decision (final EIS Section 4.1.2) and various sections of the analysis were adjusted in the final EIS based on that information. These adjustments include specific mitigation measures to protect terrestrial ecological resources, including wetlands and threatened and endangered species. The staff determined that, based on the Court of Appeals of Florida's decision, it is reasonable to expect that Conditions of Certification similar to or no less effective than those originally issued will be in place before construction and operation of the proposed units begins. Therefore, the staff concludes the original determination of a moderate impact is still appropriate. Additionally, although transmission lines are not regulated by the NRC, the impacts of building and operating new transmission lines were considered (final EIS Section 4.1.2). The final EIS analyzed the two routes FPL proposed for the western transmission line route, documents the transmission line impacts and considers mitigation. Lastly, regarding CECs, the staff disclosed the existence of CECs in the final EIS and performed a conservative analysis. Details regarding the staff analysis can found in final EIS Section 5.2 and Appendix E.

In closing, the staff believes that all of the issues raised in letters that the NRC received from the NPS have been adequately addressed and meet the applicable regulations. The NRC reiterates its appreciation of the interaction and dialogue with the NPS and Department of Interior over the course of the environmental review. If you have any additional questions, please contact Ms. Alicia Williamson, Environmental Project Manager, at 301-415-1878 or via e-mail to [Alicia.Williamson@nrc.gov](mailto:Alicia.Williamson@nrc.gov).

Sincerely,

*/RA/*

Francis M. Akstulewicz, Director  
Division of New Reactor Licensing  
Office of New Reactors

Docket Nos.: 52-040  
52-041

LETTER TO MR. S. AUSTIN SUBJECT: FINAL ENVIRONMENTAL IMPACT STATEMENT (EIS) PREPARED IN SUPPORT OF THE ENVIRONMENTAL REVIEW OF THE FLORIDA POWER & LIGHT COMPANY DATED SEPTEMBER 7, 2017

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