



September 28, 2017

L-2017-173
10 CFR 50.4
10 CFR 50.36.b
EPP 4.1

U.S. Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

RE: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Environmental Protection Plan Report
Event Date: September 11, 2017
Unusual or Important Environmental Event - Turtle Mortality

On September 11, 2017 a dead juvenile green sea turtle (*Chelonia mydas*) and a loggerhead sub-adult (*Caretta caretta*) were recovered from the east side of the St. Lucie Plant Intake cooling canal five-inch barrier net. Necropsies were not performed due to limited access to veterinary services immediately following Hurricane Irma. The determination by staff biologists is that both mortalities were causal due to forced submersion.

The attached report is being submitted pursuant to the requirements of Section 4.1 of the St. Lucie Units 1 and 2 Environmental Protection Plans to provide the description of reportable sea turtle mortalities that were causal to plant operations at the St. Lucie Plant.

Sincerely,

A handwritten signature in black ink that reads "Michael J. Snyder".

Michael J. Snyder
Licensing Manager
St. Lucie Plant

MJS/rcs

Attachment

cc: FDEP Siting Office

IE77
NRR

DESCRIPTION OF THE EVENT

On September 11, 2017 two sea turtles were recovered from the east side of the 5-inch turtle net; a green juvenile (chelonian mydas) and a loggerhead sub-adult (*Caretta caretta*). The discovery occurred the morning after Hurricane Irma impacted the St. Lucie Plant. The loss of electricity and lack of ice as well as the unavailability of a veterinarian precluded preserving the turtles for necropsy.

The resident biologists determined that the mortalities were most likely due to forced submersion, thus causal to plant operations.

The limits for sea turtle injuries and mortalities resulting from plant operations were set by the National Marine Fisheries Incidental Take Statement, issued by the NRC in 2016. These limits have not been exceeded.

CAUSE OF EVENT

The most probable cause of these mortalities is that Hurricane Irma conditions within the confines of the intake canal contributed to the turtle mortalities.

CORRECTIVE ACTION

The five-inch turtle net was inspected and cleaned as soon as weather conditions allowed safe access to the net. Monitoring and capture activities were increased to reduce the number of resident sea turtles in the intake canal immediately following Hurricane Irma. Hourly inspections of the five-inch net are performed during daylight hours, as well as constant surveillance of the two tangle nets.

ACTIONS TO PRECLUDE FUTURE EVENTS

Aggressive turtle monitoring and removal protocols remain in place; hourly inspections of the five-inch net and constant observations on the tangle nets occur during daylight hours. When visibility allows, staff biologists perform hand and dip net turtle captures in an effort to minimize turtle residence time. Restoring net cleanliness and performing a net inspection by divers immediately after a hurricane event is a top priority.

AGENCIES NOTIFIED

The Florida Fish and Wildlife Conservation Commission was notified on September 11, 2017, in accordance with Marine Turtle Permit MTP-125 and the Site Environmental Protection Plan. A notification was also made to the NRC on September 11, 2017, per the requirements of 10 CFR 50.72(b) (2) (xi).