



Florida Keys Aqueduct Authority

1100 Kennedy Drive
Key West, Florida 33040
Telephone (305) 296-2454
www.fkaa.com



J. Robert Dean
Chairman
District 3

Richard J. Toppino
Vice-Chairman
District 2

David C. Ritz
Secretary/Treasurer
District 5

Antoinette M. Appell
District 4

Cara Higgins
District 1

Kirk C. Zuelch
Executive Director

June 7, 2018

May Ma, Director, Program Management,
Announcements and Editing Branch
Office of Administration
Mailstop: TWFN-7A60M,
US Nuclear Regulatory Commission
Washington, D.C. 20555-0001

SUNSI Review Complete
Template = ADM-013
E-RIDS=ADM-03
ADD= Yvonne Edmonds, Eric
Oesterie, LaShawna Lewis,
Benjamin Beasley

RE: **DOCKET ID NRC-2018-0101**
Florida Power and Light Application for Renewal
Facility Operating License No. DPR-31 and DPR-41

COMMENT (28)
PUBLICATION DATE:
5/22/2018
CITATION # 83 FR 23726

Dear Director Ma:

This letter is in follow-up to a presentation the Florida Keys Aqueduct Authority (FKAA) made on May 31, 2018 at the NRC Public Hearing in Homestead Florida, re: Docket ID NRC-2018-0101, Application by Florida Power and Light (FPL) for Renewal of Facility Operating License Numbers DPR-31 and DPR-41. The Florida Keys Aqueduct Authority is an Independent Special District of the State of Florida with the responsibility of supplying the entirety of Monroe County, consisting of the group of islands known as the Florida Keys, with drinking water from the Class I Biscayne Aquifer located in southeast Miami-Dade County. Our Board of Directors is appointed by the Governor of the State of Florida and has directed staff to prepare this letter regarding the FPL Renewal of Facility Operating License No. DPR-31 and DPR-41.

For more than a decade, FPL has been out of compliance with operating requirements of its cooling canal system (CCS). The salinity values in the CCS have risen to concentrations significantly higher than found in seawater. The FPL interceptor canal originally intended to contain hypersaline water from the CCS from migrating offsite is not effective and as a result, a hypersaline plume has migrated more than two miles beyond FPL's property and contaminated a large portion of the Biscayne Aquifer. This hypersaline plume has also forced the freshwater-saltwater interface within the Biscayne Aquifer as much as four miles westward, which is farther than would otherwise naturally occur. This condition, which FPL has been ignoring for decades, is now starting to threaten critical drinking water supplies for south Miami-Dade, as well as all FKAA customers in Monroe County. **If the FKAA drinking water wellfield, which is located approximately ten miles from the Turkey Point Facility, becomes contaminated by the hypersaline plume created by FPL, the primary drinking water supply to Monroe County is lost.**

The State of Florida and Miami-Dade County have both found FPL in violation of their operating conditions and filed regulatory and permit violations against FPL. FPL entered Consent Orders with both entities rather than contest these violations in court. The primary element of both orders is to allow FPL to develop and implement a remediation strategy to reduce the artificially high salinities in the Biscayne Aquifer resulting from uncontrolled leakage from its CCS.

Contrary to groundwater modeling results performed by FPL in development of their remediation strategy to comply with both Consent Orders, actual data gathered to date from our wellfield monitoring program indicate that the current FPL remediation strategy is:

- 1) Not effective in first halting and then retracting the migration of the existing hypersaline plume, and
- 2) Continued use of the CCS is only exacerbating the migration of the existing hypersaline plume.

Past and current operational practices by FPL have led to the environmental degradation of the Biscayne Aquifer and FPL had shown little interest in dealing with these unpermitted consequences of its operation until enforcement action was taken. Even with two Consent Orders in place, there is no clear evidence that FPL can or will resolve the issues caused by continued use of its CCS.

FKAA believes that the existing damage to the local environment must be fully remediated before FPL is granted an extension to operate Units 3 and 4 at its Turkey Point facility. It makes no sense to allow this extension when FPL has such a poor track record operating the existing system.

FKAA also requests the NRC to require cooling towers be built for use with the existing operation and the closure of the existing CCS. Once built, the towers would alleviate further contamination of the Biscayne Aquifer with proven technology consistent with current industry design standards.

We appreciate the opportunity to provide these comments to your Commission. If there are any questions please contact me.

Sincerely,


Kirk C. Zuceloh
Executive Director

cc: J. Robert Dean, FKAA Board of Directors
Richard J. Toppino, FKAA Board of Directors
David C. Ritz, FKAA Board of Directors
Antoinette M. Appell, FKAA Board of Directors
Cara Higgins, FKAA Board of Directors

George Neugent, Monroe County Commissioner
David Rice, Monroe County Commissioner
Danny Kollhage, Monroe County Commissioner
Heather Carruthers, Monroe County Commissioner
Sylvia Murphy, Monroe County Commissioner
Roman Gastesi, Monroe County Administrator
Bob Shillinger, Monroe County Attorney