

TurkeyPoint34SLREISCEm Resource

From: rm@everyactioncustom.com on behalf of Ross McCluney
<rm@everyactioncustom.com>
Sent: Thursday, June 14, 2018 6:33 PM
To: TurkeyPoint34SLREIS Resource
Subject: [External_Sender] Comments RE: Docket ID NRC-2018-0101 (License Renewal for FPL's Turkey Point)

Dear NRC Staff,

Prior to the approval for construction of FPL's nuclear reactors at Turkey Point, while I was pursuing my doctorate in physics at the University of Miami, I was asked by Florida Audubon Society to comment on the draft Environmental Impact Statement for the project.

I composed my statement and wrote by hand a cover sheet in ink as a member of the Board of Tropical Audubon Society. My copy has a stamp that it was received by the State Planning and Development Clearinghouse in Tallahassee on 2 April 1972.

I warned of the effects of interruption of overland and subsurface flow of fresh water into Biscayne Bay and Card Sound, mentioning that some species are dependent on gradual salinity gradients and that major aquatic species to a degree are abundant because they have free access to whatever proportions of the salt gradient they need at different times in their life cycles.

I mentioned that water passing through units 3 and 4 will be subjected to low-level nuclear radiation, with the time of exposure being quite low, so not expected to pick up significant radioactivity in the water on its own. However, certain biological and mineral deposits tend to accumulate on the surfaces of the cooling tubes and are therefore subjected to longer radiation exposure times. Some of this material eventually becomes detached and can enter the cooling water.

Thinking back on it now, I realize that some of the water in the cooling canals can seep into the ground water and might produce an elevation of the subsurface radioactive background. In my statement, I urged the powers that be to consider the environmental effects of this pathway carefully.

I mentioned that due to evaporation, the salinity of water in the recirculating cooling system will be continually increasing and that provisions were made in the agreement by FPL for reducing this salinity by discharging some highly saline water and drawing in water of lower salinity from Card Sound.

I warned that a condition might inadvertently occur whereby the cooling water salinity might increase faster than it could legally be reduced by dilution and flushing. Such a salinity runaway of the cooling system could eventually threaten the continuing operation of the plant and would therefore constitute an emergency subject to waiver provisions of the agreement, leaving the company free to discharge unlimited amounts of highly saline water into the Sound at whatever temperature is permitted by local or state laws. I mentioned the potential for catastrophic and permanent damage to the ecology of the Sound and lower Biscayne Bay.

I have heard more recently that many of my warnings have come to pass and that subsurface drinking water supplies in the area, including the City of Homestead are threatened or already partially contaminated, to a degree.

As a Florida resident, I am very concerned about the operation of Turkey Point until the early 2050s, especially since the plant is already contaminating nearby resources such as Biscayne Bay National Park and threatening our region's drinking water resources.

I urge the NRC independently to evaluate the pollution leaking from the cooling canal system and study alternative cooling technologies that could protect the environment, such as the installation of cooling towers, which are already used for the natural gas plant onsite (Unit 5) and were approved by the NRC for use at the proposed new Turkey Point reactors (Units 6 & 7) that seem unlikely ever to be built.

The NRC needs to be aware that Turkey Point and the area around it has already experienced the negative effects of sea level rise and storm surges. The NRC needs to study a range of sea level rise projections and consider those impacts on the plant, the cooling canal system, and the surrounding community, including for emergency evacuation procedures and planning.

Thank you.

Sincerely,
Ross McCluney
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Federal Register Notice: 83FR23726
Comment Number: 36

Mail Envelope Properties (20180614223317.1.9DA3E76FF8AE95EF)

Subject: [External_Sender] Comments RE: Docket ID NRC-2018-0101 (License Renewal for FPL's Turkey Point)

Sent Date: 6/14/2018 6:33:17 PM

Received Date: 6/14/2018 6:33:19 PM

From: rm@everyactioncustom.com

Created By: rm@everyactioncustom.com

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Files	Size	Date & Time
MESSAGE	4001	6/14/2018 6:33:19 PM

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Priority: Standard

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Sensitivity: Normal

Expiration Date:

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