

TurkeyPoint34SLREISCEm Resource

From: PStoddard@everyactioncustom.com on behalf of Philip Stoddard
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Sent: Thursday, June 21, 2018 1:34 PM
To: TurkeyPoint34SLREIS Resource
Subject: [External_Sender] City of South Miami comments RE: Docket ID NRC-2018-0101
(License Renewal for FPL's Turkey Point 3&4)

Dear NRC Staff,

FPL's proposal to extend the operating license on TPN 3&4 is subject to the same forces of nature that shaped FPL's COLA for TPN 6&7. The City of South Miami focusses here on storm surge.

The Industrial Wastewater Facility (IWF) doubles as a cooling structure for TPN 3&4, and receives many forms of low-toxicity waste that are nonetheless inappropriate for release directly into Biscayne Bay. The canal banks of the IWF are sufficiently low that they are overtopped by storms today, whereupon all this wastewater is flushed into Biscayne Bay. Only a small increase in sea level further compromises the IWF system, and allows for more frequently release of IWF contaminants.

In the COLA for TPN 6&7, FPL determined that in order to be safe from storm surge while accommodating one foot of sea level rise, TPN 6&7 had to be constructed at a base elevation of 26 feet. By FPL's own analysis, one foot less, 25 feet base elevation, would be necessary to operate a nuclear plant safely at today's sea level.

The reactor and spent fuel pools for TPN 3&4 were constructed at 20 feet base elevation, with some supporting buildings at lower elevations. Disregarding future increase in sea level, FPL's own analysis indicates that TPN 3&4 are already five feet lower than prudent for storm surge protection. Including realistic sea level increases projected by NOAA, the Army Corps of Engineers, and the IPCC, the risk increases significantly.

Damage from storm surge, including a failure in the cooling system, could compromise containment of nuclear fuel. A leak of nuclear fuel would produce extreme environmental damage affecting either or both of the two National Parks in the immediate region, Everglades National Park and Biscayne National Park, as well as areas of Biscayne Bay and residential areas situated outside the two National Park systems.

The City of South Miami believes the current 20' elevation of TPN 3&4 constitutes a significant and growing hazard to the environment. Given the storm risks that FPL documented for this site in the FPL COLA for TPN 6&7, and given that TPN 3&4 do not meet the risk mitigation standards established and accepted by the NRC in the TPN 6&7 COLA, a license renewal or extension for TPN 3&4 would unreasonably expose the region to significant environmental hazards.

Sincerely,
Philip Stoddard
City Of South Miami 6130 Sunset Dr South Miami, FL 33143

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