

TurkeyPoint34SLREISCEm Resource

From: Steven Schoedinger <schoedingerconsulting@aol.com>
Sent: Thursday, June 21, 2018 11:36 PM
To: TurkeyPoint34SLREIS Resource
Cc: Burton, William
Subject: [External_Sender] Docket NRC-2018-0101 - Scoping Comments on Florida Power & Light's Subsequent License Renewal Application for Turkey Point Nuclear Generating Station's Reactor Units 3 & 4
Attachments: FL Keys Press- FKAAs Opp to TPP CCS Pollution.pdf; Mia Herald TPP IRMA Article, Feb 2018.pdf

Dear Ms. Ma and Mr. Burton:

Attached for U.S. Nuclear Regulatory Commission staff review and consideration are 2 PDFs comprising factual articles published since 2016 by respected South Florida and national news agencies chronicling the operating and water pollution issues at the FPL TPP plant site and 46 year old open canal cooling water system for existing reactors #3 and #4.

These attached newspaper articles demonstrate (1) a 40+year pattern by FPL of negligent, unreliable and unsafe operation and maintenance of the 6000 acre open canal system for cooling the water from the nuclear reactors and non-compliance with local, state and national environmental regulations, and (2) contain information pertinent to Docket # NRC-2018-0101 Scoping Comments Phase of the Florida Power & Light's Subsequent License Renewal Application for Turkey Point Nuclear Generating Station's Reactor Units 3 & 4.

Sincerely,

Steven R Schoedinger, P.E.
Member, Environmental Committee
Ocean Reef Community Association
58 Anchor Drive, Unit B
Key Largo, FL 33037

Federal Register Notice: 83FR23726
Comment Number: 104

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Reactors

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the Biscayne Aquifer.

"If our wells, which are located approximately 10 miles from the FPL plant, are contaminated by the FPL created high salinity plume, the entire water supply to the Florida Keys is gone," FKAA Executive Director Kirk Zuelch wrote on behalf of the FKAA board. "Past and current operational issues caused by FPL have led to the environmental degradation of sole-source aquifer and Biscayne Bay."

The Florida Department Environmental Protection has found FPL in violation of its permits and of state rules. DEP and the FPL have worked out a settlement agreement that calls on FPL to reverse the westward flow of the plume and eradicate it.

The plan, if successful at all, could take 10 years to complete.

"FPL has shown little interest in dealing with these unpermitted consequences of its operation until enforcement action was taken," Zuelch wrote. "Even with consent orders in place, there is no clear evidence that FPL can resolve the issues they have caused by using the cooling canal system over many years, nor can they prove that the canal cooling system is still a viable option to handle thermal loads from the existing nuclear reactors."

"FKAA believes that the existing damage to the local environment must be

fully reversed before FPL is granted any additional increase to thermal load capacity at its Turkey Point power plant. It makes no sense to allow this expansion when FPL has such a poor track record operating the existing system."

FPL wants to place two new reactors at the plant and expand its energy supply capabilities. Part of the case could be decided by the Florida Supreme Court.

FPL sent a legal brief to the state's highest court asking the court to rule on whether it has to place some of its power lines underground. That part of the project is currently being challenged in court by Miami-Dade County, the cities of Miami, South Miami and Pinecrest.

The Nuclear Regulatory Commission could take months to rule on the new reactors.

tohara@keysnews.com

FKAA seeks denial of nuclear reactors

BY TIMOTHY O'HARA
Free Press Staff

MONROE COUNTY — The Florida Keys Aqueduct Authority has asked federal nuclear regulators to not grant Florida Power & Light's request for two new reactors at Turkey Point, citing FPL's "poor track record."

The FKAA sent a letter to

the U.S. Nuclear Regulatory Commission late last month that was extremely critical of FPL's operations at the nuclear power plant at the top of the Florida Keys.

The plant's cooling canal system has created a large underground saltwater plume that could jeopardize the Keys' water supply,

See **REACTORS**, page 3A

Florida Nuke Plant Did Not Meet Fed Safety Guidelines as Irma Roared

By

Update | Operators of a nuclear power plant in the path of Hurricane Irma kept one reactor operating during the cyclone, although the plant had not finished meeting stricter federal safety requirements implemented after Japan's Fukushima accident.

The Turkey Point nuclear plant in Homestead, along the southeast Florida coast, experienced an unrelated failure in one reactor's cooling system during the storm. A part called the steam generator's feed regulating valve failed on Sunday night, prompting engineers to shut down the reactor.

The cooling system malfunction did not cause any radiation leakage, according to the Nuclear Regulatory Commission.

The failure of the valve at Turkey Point was unrelated to larger, federally mandated improvements that are still pending, including improving seals on exterior doors and improving floodwater drainage mechanisms near "key" cooling pumps, according to a flood- and hurricane-preparedness report the power plant sent to the Nuclear Regulatory Commission in June — a requirement of post-Fukushima regulations.

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Poor seals on exterior doors could lead to "substantial leakage" in a hurricane, the report also said.

At Turkey Point, the rooms that hold the cooling pumps "do not have a roof and

are exposed to the rainfall," the report read. In the event of flooding, operators of the plant would drain the rooms with pumps that run on diesel fuel. A spokesman for the plant said the facility always has a week's worth of fuel on hand in case of a power outage — but he did not say how the pumps are refueled during a crisis.

Scott Burnell, a spokesman for the Nuclear Regulatory Commission, said commission staff had not signed off on Turkey Point's proposals to meet federal guidelines, but an initial review "concluded the plant's analyses are acceptable."

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But critics of the plant say further delay could be dangerous.

"The pump room is Turkey Point's Achilles heel," said David Lochbaum, director of the Nuclear Safety Project for the Union of Concerned Scientists.

"Without Component Cooling Water during an accident, workers must deploy backup to backup systems," he added. "At Fukushima, workers were unable to accomplish this task in time to prevent three reactor cores from overheating."

Power failures, which are common during hurricanes, are another concern to nuclear watchdogs. The risk of a serious accident rises significantly in a power outage, according to the Nuclear Regulatory Commission.

Turkey Point did keep one of its two reactors operating as the storm approached, only taking it offline after the valve malfunctioned.

"When there's a possibility to lose power, why would you take the risk of increasing that?" Maggie Gundersen, founder of Fairewinds Energy Education and former nuclear industry employee, told *Newsweek*.

"It's just absolute hubris and a huge risk to the population."

The most likely problem for a nuclear power plant in a hurricane, added Henry Sokolski, executive director of the Nonproliferation Policy Education Center, "is a loss of power to the plants."

“Most people don’t understand this, but you need electricity going into a power plant — two sources of it generally to be on the safe side — to make sure that the electric motors that control things like safety control rods are running,” he added.

But the Nuclear Regulatory Commission spokesman Burnell said Turkey Point's response to Irma was "entirely acceptable."

"There was no reasonable concern that the storm would challenge plant safety from a flooding perspective," Burnell said.

Story was updated to provide more context about the plant's preparedness.