

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE SECRETARY

	)	
In the Matter of	)	
Florida Power and Light Company	)	Docket Nos. 50-250/251 – SLR
Turkey Point Units 3 and 4	)	
	)	

**MONROE COUNTY, FLORIDA’S REQUEST TO  
PARTICIPATE AS INTERESTED GOVERNMENTAL PARTICIPANT**

Pursuant to 10 C.F.R. § 2.315(c) and the hearing notice published by the U.S. Nuclear Regulatory Commission (“NRC” or “Commission”) at 83 Fed. Reg. 19,304 (May 2, 2018), Monroe County, Florida hereby requests leave to participate in this proceeding as an Interested Governmental Participant (IGP).

**Interests of Monroe County**

The Turkey Point nuclear power plant operated by Florida Power and Light (FPL) is located in southeast Miami-Dade County, adjacent to Biscayne Bay. Monroe County borders Miami-Dade County to the South. It comprises the “fabulous” but fragile Florida Keys, an island chain that stretches from the Florida Everglades to the Dry Tortugas and encompasses the Florida Keys National Marine Sanctuary, three national parks (Biscayne National Park, Everglades National Park, Dry Tortugas National Park), four National Wildlife Refuges, and three State Aquatic Preserves. Monroe County has also been designated as an Area of Critical State Concern by the Florida Legislature.

The primary concern of Monroe County relates to FPL’s operation of the cooling canal system (CCS) to cool the reactors for Units 3 and 4, and the hypersaline plume that has developed in the Biscayne Aquifer and is migrating westward. Monroe County depends on the Biscayne

Aquifer as the source of its drinking water, which is supplied by the Florida Keys Aqueduct Authority (FKAA). Contaminants in the plume and the groundwater generated by the Turkey Point plant include phosphorous, ammonia, TKN, total nitrogen, radioactive tritium, and chlorophyll *a*. The plume has migrated more than two miles beyond FPL's property and contaminated a larger portion of the Biscayne Aquifer. The 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. As reported by the FKAA in the agency's June 7, 2018, letter to the NRC, "[i]f 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."

Monroe County is also concerned about the impacts of the Turkey Point plant on the environmentally sensitive Biscayne Bay, a portion of which falls within the jurisdictional limits of the County. As reported by the National Park Service (NPS) in its June 22, 2018, letter to the NRC, "groundwater tritium data and subsurface conductivity confirms that the CCS . . . is not a closed system and has: 1) connectivity with the Biscayne Bay and nearby wetlands, and 2) a subterranean hyper-saline plume that underlies both the Turkey Point facility and Biscayne NP." The environmental impacts to Biscayne Bay, which shares ecological connections with other waters and resources of the Florida Keys, threaten the tourism and fishing industries on which Monroe County's identity and economy are based.

#### **Designation of Single Representative**

The County's representative for purposes of this proceeding is the Monroe County Board of County Commissioners.

**Identification of Contentions on Which the County Will Participate**

Monroe County seeks to participate on the two contentions raised by the Southern Alliance for Clean Energy in its Request for Hearing and Petition to Intervene, which include (1) that the FPL Environmental Report fails to adequately discuss the environmental impacts of using the CCS in violation of the National Environmental Policy Act (NEPA) and NRC implementing regulation 10 C.F.R. § 51.53(c); and, (2) that FPL has failed to consider the reasonable alternative of cooling the Turkey Point Units 3 and 4 reactors with mechanical draft cooling towers in violation of NEPA and 10 C.F.R. § 51.53(c)(2).

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that on September 20, 2018, I posted copies of the foregoing Monroe County, Florida's Request to Participate as Interested Governmental Participant on the NRC's Electronic Information Exchange System.

/s/ Derek V. Howard  
Derek V. Howard  
Assistant Monroe County Attorney