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Comment On: NRC-2018-0280-0001
Virginia Electric and Power Company; Dominion Energy Virginia: Surry Power Station, Unit Nos. 1 and 2

Document: NRC-2018-0280-DRAFT-0008
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Submitter Information

Name: Randal Owen

General Comment

See attached file(s)

Attachments

VMRC_Surry Power Final

COMMONWEALTH of VIRGINIA

Marine Resources Commission
2600 Washington Avenue
Third Floor
Newport News, Virginia 23607

Matthew J. Strickler
Secretary of Natural Resources

Steven G. Bowman
Commissioner

January 22, 2019

Office of Administration
Mail Stop TWFN-7-A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Virginia Electric and Power Company;
Dominion Energy Virginia: Surry Power Station,
Unit Nos. 1 and 2
Docket ID NRC-2018-0280

Dear NRC staff:

This will respond to the request for comments regarding the Nuclear Regulation Commission's (NRC) intention to conduct scoping and prepare an environmental impact statement (EIS) for the subsequent license renewal of the operating licenses for Surry Power Station, Unit Nos. 1 and 2 in Surry County, Virginia. Specifically, on October 15, 2018, Dominion Energy Virginia submitted to the NRC an application for subsequent license renewal of Facility Operating License Nos. DPR-32 and DPR-37 for an additional 20 years of operation at Surry Power Station, Unit Nos. 1 and 2. The Surry units are pressurized water reactors designed by Westinghouse. The current renewed operating license for Unit 1 expires at midnight on May 25, 2032, and the current renewed operating license for Unit 2 expires at midnight on January 29, 2033.

Please be advised that the Virginia Marine Resources Commission (Commission) serves as the stewards of Virginia's marine and aquatic resources, and protectors of its tidal waters and homelands, for present and future generations. We manage saltwater fishing, both recreational and commercial, to maintain sustainable fisheries for the benefit of all anglers and the ecosystem. Additionally, the Commission manages the state's submerged bottom lands in public trust for the citizens of the Commonwealth, and its tidal wetlands, sand dunes and beaches in order to preserve and protect Virginia's natural resources and the habitat our saltwater fisheries depend on.

In a letter to the Commission, dated August 3, 2017, Dominion Energy stated the company does not anticipate any refurbishment as a result of the technical and aging management program information that will be submitted in accordance with the NRC license

renewal process. Since the construction of the Surry Plant's cooling water intake structures, the EPA implemented its new rule, in response to Section 316(b) of the Clean Water Act, which requires that EPA ensure water intake structures reflect the best technology available to protect aquatic organisms from being killed or injured by impingement (being pinned against screens or other parts of a cooling water intake structure) or entrainment (being drawn into cooling water systems and subjected to thermal, physical or chemical stresses).

Accordingly, the Commission recommends that the draft EIS comprehensively evaluate the alternatives required to ensure compliance with current 316(b) requirements and any renewal permit issued by NRC and DEQ contain the appropriate cooling water intake structure requirements, monitoring conditions, recordkeeping and reporting requirements in accordance with 40 CFR Part 125.98.

Lastly, the Commission would like to point out that the Commonwealth is seeing an increased number of requests for new raw water intakes in the tidal and tidal freshwater reaches of the Chesapeake Bay tributaries. To date, the Commonwealth does not know how much the collective impacts from these intakes contribute to the mortality of anadromous fishes. These species continue to experience depleted stocks nationally. Virginia's contribution to the mortality of these migratory finfish species is considered annually by the Atlantic States Marine Fisheries Commission and the Mid-Atlantic Fisheries Management Council. This consideration may lead to additional management actions required of Virginia to reduce mortality.

As such, the Commission requests that in addition to the aforementioned recommendations, the EIS should identify mitigation strategies to offset past and anticipated future mortalities of anadromous and resident fishes resulting from Surry Power Stations' continued operation of their intake structures. This is in keeping with mitigation recently required by the Commission's permits issued for municipal raw water intakes in the Chickahominy and Pamunkey Rivers.

Should you have any questions please contact me at (757) 247- 2251 or by email at randy.owen@mrc.virginia.gov. Thank you for the opportunity to comment.

Sincerely,

Randal D. Owen
Deputy Chief, Habitat Management

RDO/lrp
HM