

1 speak tonight, make sure that, you know, we want to  
2 make sure that what you say is exactly what you want  
3 us to hear.

4 So, with that, I would like to introduce  
5 our first speaker, I picked him as our first speaker  
6 for several reasons.

7 Number one, he is an official from the  
8 area here and, therefore, he is -- should be  
9 accorded some sort of special consideration.

10 And, second of all, he asked because  
11 he's got to go catch the ferry.

12 So, at this time, I would like to  
13 introduce Sanford Wanner.

14 MR. WANNER: Wanner.

15 MR. MUSSATTI: Wanner, who is your  
16 interim Surry County Administrator.

17 MR. WANNER: Yes, sir.

18 Do you wish me to face the audience or -  
19 -

20 MR. MUSSATTI: Yes, well, it doesn't  
21 matter which you face because you're going to be  
22 speaking into the microphone, but you need to stand  
23 on that, remember.

24 MR. WANNER: Good evening, my name is

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1 Sanford D. Wanner. I am the interim County  
2 Administrator of Surry County, Virginia.

3 And, I want to thank you for this  
4 opportunity to provide comments on Dominion Energy's  
5 application to renew the licenses of the two units  
6 at the Surry Power Station for a second 20-year  
7 term.

8 As the interim County Administrator of  
9 Surry, it has been my privilege to work with the  
10 power station because they have been a good  
11 neighbor. They have been environmentally  
12 responsible, particularly in the area of groundwater  
13 protection for a groundwater dependent community.

14 They have been forthcoming in providing  
15 public information. Their location is compatible  
16 with our storage resources and our storage sites.  
17 And, they are a vital component of the Surry County  
18 economy and that of our neighboring communities in  
19 Hampton Roads.

20 Your support of this application would  
21 be appreciated.

22 Thank you.

23 MR. MUSSATTI: Thank you.

24 Would you like to submit that in writing

SPS-1-1

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1 as well?

2 MR. WANNER: I'll clean it up.

3 MR. MUSSATTI: Okay, thank you.

4 Next up would be Fred Mladen, he's from  
5 Dominion and on deck will be Erica Gray, you'll be  
6 next.

7 MR. MLADEN: All right, good evening.  
8 My name is Fred Mladen, last name is M-L-A-D-E-N.  
9 And I'm the Second Vice President of the Surry Power  
10 Station.

11 I've been an employee of Dominion Energy  
12 for 34 years, all of them in nuclear.

13 I'd like to thank the U.S. Nuclear  
14 Regulatory Commission for holding this important  
15 meeting to accept public comments on Dominion  
16 Energy's application for renewal of licenses for the  
17 two Surry units for a second 20-year term.

18 Nuclear energy is by far the largest  
19 source of carbon-free energy both in Virginia and  
20 the nation.

21 It's key aspect of any reasonable clean  
22 energy strategy and operation of not only Surry  
23 Power Station but all the nuclear power stations  
24 which produce no greenhouse gases and is critical

SPS-2-1

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1 for the further build out of zero carbon renewables  
2 which generate power but intermittently.

SPS-2-1

3 Surry Power Station is one of the top  
4 performing stations in the United States as measured  
5 by the NRC and the nuclear industry.

6 The two units at Surry produce about 15  
7 percent of the electricity that's utilized in the  
8 State of Virginia.

9 In addition, the station has an economic  
10 edge for the Hampton Roads area.

SPS-2-2

11 We take great pride that our station  
12 provides safe, reliable and affordable energy that  
13 is vital to the economic growth of the Commonwealth  
14 and provides well-paying jobs for more than 800  
15 employees.

16 In addition to the millions of dollars  
17 of tax revenue for Surry County, taxes paid by the  
18 station support schools and important public  
19 services and the salaries earned by our colleagues  
20 who work at the station go directly to the purchase  
21 of goods and services in the local economy.

22 Surry Power Station has maintained  
23 excellent compliance with environmental health  
24 standards, research and permitting. The

SPS-2-3a

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1 environmental monitoring is continuous,  
2 consultations with the National Historical Resource  
3 Agencies are ongoing in support of subsequent  
4 license renewal and we continue to report  
5 environmental results in keeping with not only  
6 regulatory requirements, but Dominion Energy's  
7 environmental stewardship policy.

SPS-2-3b

8 We're not about doing what's the minimum  
9 required, we're about doing right for the  
10 environment.

11 And one of the examples is, we work in  
12 concert with the neighboring Virginia Department of  
13 Game and Inland Fisheries on the Hog Island Wildlife  
14 Management area.

15 The subsequent license renewal for Surry  
16 Power Station, its current licenses for Units 1 and  
17 2 will expire in 2032 and '33 respectively, will  
18 ensure that that facility will continue to provide  
19 not only electricity to our customers into the mid-  
20 century, but employment for the people who supports  
21 the operation.

SPS-2-4

22 Renewing the licenses for Units 1 and 2  
23 will mean that the units may continue to provide  
24 safe, reliable and affordable electricity through

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1 2052 and 2053 respectively.

2 As the NRC staff will discuss tonight  
3 and has discussed, license renewal is a very  
4 thorough process governed by federal regulations and  
5 backed by significant research into the effects of  
6 aging of equipment along with rigorous program of  
7 tests and inspections.

8 Effectiveness of our ability to manage  
9 the long term operation of these units is  
10 demonstrated by the fact that after more than 45  
11 years of operation, our reactors at Surry are  
12 performing at very high levels in terms of safety  
13 and reliability.

14 Moreover, Electric Power Research  
15 Institute and the United States Department of Energy  
16 conducted extensive scientific research to  
17 understand the technical aspects associated with the  
18 safe, long term operation of nuclear power plants.

19 This research has shown that there are  
20 no generic technical issues that would prevent a  
21 well-maintained nuclear plant such as Surry from  
22 operating safely during the subsequent license  
23 renewal period.

24 Dominion Energy has performed extensive

SPS-2-5a

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1 technical evaluations using insights from various  
2 industry research groups as well as the NRC  
3 regulations and guidance documents.

4 We demonstrate in our application  
5 submittal that Surry Power Station can safely  
6 operation for an additional 20 years.

7 Again, Dominion Energy is committed to  
8 safe and reliable operation today and every day.  
9 Appreciate the opportunity to speak to you tonight  
10 in support of the Surry operating for an additional  
11 20 years.

12 MR. MUSSATTI: All right, thank you.

13 And, you are Erica?

14 MS. GRAY: Hello, my name is Erica Gray.  
15 I came over here from Henrico, Virginia.

16 I have been following mostly the North  
17 Anna and its license and have not had too many  
18 opportunities to come over here to Surry.

19 Of course, it peaked my attention when I  
20 saw that Surry is actually going forward with its  
21 subsequent license first before North Anna which  
22 they are in the queue.

23 Following behind, I guess I have to  
24 mention from the last commenter is if nuclear fuel

SPS-2-5

SPS-3-1

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1 could actually jump into the reactors by themselves,  
2 it would be carbon-free.

3 But, actually, the whole process of the  
4 nuclear fuel chain is extensively carbon. It is  
5 carbon intensive and highly toxic and another 20  
6 years added on to this last license renewal will get  
7 us many more metric tons of highly radioactive fuel,  
8 spent fuel that will be radioactive and toxic for  
9 eternity, which there really is no solution.

SPS-3-1

10 So, I had to add that.

11 As it goes forth with this license  
12 renewal, I have many questions and I guess we can  
13 start with, first of all, I was told that Dominion  
14 expects, or the NRC expects that after 18 months of  
15 review, they will get this license renewal.

SPS-3-2

16 Eighteen months is a short period of  
17 time to review thousands of documents, if this is to  
18 be a thorough investigation or review or whatever  
19 you want to call it.

SPS-3-3a

20 I guess, for the most part, the goal is  
21 generic but I think we need to look at site  
22 specific.

23 When it comes to safety, I'm sure that  
24 the NRC as well as Dominion want to run safe plants.

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1 But, I wanted to mention that also Surry happens to  
2 be one of the plants that's had the most nuclear  
3 accidents and fatalities.

4 There are nine people have died at  
5 Surry, more than any other commercial nuclear  
6 facility.

7 In 1972, two men were killed when a  
8 steam valve malfunctioned.

9 In October of '83, a different steam  
10 pipe burst, killing one worker and severely injuring  
11 another.

12 In 1984, two men were electrocuted.

13 In 1986, four were killed when 3,000  
14 gallons of super heated water in Unit 2 ruptured.

15 Since Surry opened in 1973, the walls of  
16 the pipes which is expected to last for 40 years  
17 life of the reactor have in some spots gone from  
18 one-half inch thick to thinner than a credit card  
19 and no one knows why.

20 Sorry, I've got lots of miscellaneous  
21 notes.

22 Tests on corresponding pipes at Surry on  
23 the other unit reveals similar erosion.

24 Clearly, as this plant gets older, we

SPS-3-3b

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1 need to become more diligent.

2 So, that's specifically talking about  
3 just the past. I mean, this reactor, we're already  
4 into the second -- well the first license renewal by  
5 seven years.

6 From looking through the documents,  
7 there's still a lot of commitments that I'm not even  
8 sure have been met for the first license renewal and  
9 we're already seven years in.

10 The EMDA report, the expanded materials  
11 degradation assessment, basically it has also  
12 instructed licensees an order they must resolve  
13 issues related to reactor pressure vessel  
14 embrittlement irradiation. This is stress  
15 corrosion, cracking of the reactor internals, on and  
16 on.

17 I don't think that if we're just going  
18 to be looking at the GAL as a generic, it's got to  
19 be more specific on Surry and tests need to be  
20 performed, not just commitments before we move  
21 forward.

22 MR. MUSSATTI: Erica, can I suggest that  
23 what we do is give you an opportunity to speak one  
24 more time later on after other people have spoken

SPS-3-4a

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1 and that will give you a chance to look through your  
2 notes a little bit more.

3 I really think it's important for you to  
4 speak because we don't have very many people here  
5 that are speaking from a non-pro nuclear stance.

6 So, I'd like to give you chance to, you  
7 know, sit down, go over your notes a little bit and  
8 arrange your thoughts a little bit while we go  
9 through a few more speakers.

10 MS. GRAY: Well, we can do that. I can  
11 do that, too. But, I guess let me just kind of  
12 really point out something in particular.

13 MR. MUSSATTI: Okay, you've got one  
14 minute.

15 MS. GRAY: I think the -- well, I'm  
16 looking for my major notes here.

17 I think that the NRC needs to look at  
18 all the maintenance reports, the replacement parts,  
19 items that actually -- and the event reports because  
20 there's always lots of those but a lot of those  
21 don't actually make events because they get shifted  
22 over into a different category which is a corrective  
23 action plan. So, the public really doesn't get to  
24 see those.

SPS-3-4b

1                   We need real examinations. All  
2                   pertinent information from the manufacturers should  
3                   be looked at because in 2016, with the whole problem  
4                   with Creusot Forge where there was falsifying the  
5                   documentation.

6                   We know that both North Anna and Surry  
7                   have had different components from those different  
8                   companies.

9                   All the data should be compiled, all the  
10                  exemptions, relief requests, amendments, there has  
11                  been so many over the years, there's no way you can  
12                  go off just a regular GALL generic report because  
13                  when the reactor started up 47 years ago, it had  
14                  requirements, it had codes. And a lot of that has  
15                  changed over time. There's been laws and amendments  
16                  and changes.

17                 So, for a full investigation, all that  
18                 needs to be looked at.

19                 Also, when it comes to all the  
20                 differences in fuels, all the fuel burnups have  
21                 changed over the years. I mean, all the chemistry  
22                 in the reactors, I mean, all that needs to be looked  
23                 at, it can't just be generic.

24                 And so, I think, for the most part, it

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1 can't just be generic, it's going to have to be more  
2 thorough. We're only seven years into the first and  
3 I don't see where there's going to be a difference  
4 between a first license renewal and then a  
5 subsequent license renewal.

6 We can't just take the papers and copy  
7 and paste and put them over. We actually need to  
8 have the tests.

9 And, one last thought here, when I talk  
10 about exemptions and reliefs, Dominion doesn't plan  
11 on actually looking at the pressure reactor vessel,  
12 they, instead, when they were supposed to do it in  
13 2013 and '14, they're not going to do it until 2022,  
14 2023.

15 Now how are we going to assess if this  
16 plant is safe if we don't actually have to do the  
17 inspections? If we put off these inspections until  
18 after they get the license? That's ridiculous.

19 MR. MUSSATTI: Okay, thank you, Erica.

20 Once again, if you want to try and  
21 rearrange your notes and at the end right before we  
22 stop, you know, bring up something that is new, then  
23 we can do that.

24 At this time, I would like to ask Ray

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1 Phelps to come forward.

2 MR. PHELPS: Good evening, thank you,  
3 sir.

4 My name is Ray Phelps, I'm the Emergency  
5 Services Coordinator for Surry County.

6 And, I would like to take this  
7 opportunity to thank you guys for coming down and  
8 updating the citizens of Surry County on the future  
9 of Dominion Energy.

10 Also, Surry County has had a long  
11 outstanding history with Dominion Power and we  
12 appreciate everything that Dominion Power has done  
13 for Surry County and we look forward to a much  
14 longer interest in place.

15 MR. MUSSATTI: Okay, thank you.

16 At this time, I would like to ask, India,  
17 is there anybody that has indicated on the phone  
18 that they would like to make a comment?

19 INDIA: Currently, no one has asked to  
20 make a comment. But, if you would like to have a  
21 comment or question and you're just now joining us,  
22 please press star, one and record your name when  
23 prompted.

24 Thank you.

SPS-4-1

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1 MR. MUSSATTI: Okay, thank you, India.

2 How many people do we have on the line?

3 INDIA: One.

4 MR. MUSSATTI: One? One person on the  
5 phone?

6 INDIA: Yes.

7 MR. MUSSATTI: Okay, thank you.

8 All right then, we will move on to  
9 Jennifer Gwaltney who is our next speaker. And she  
10 is - I'm not sure the exact name of it, but she's  
11 with the Surry School and other things.

12 MS. GWALTNEY: Good evening. Thank you  
13 for allowing us to come before you tonight.

14 My name is Jennifer Gwaltney spelled G-  
15 W-A-L-T-N-E-Y.

16 I am a licensed teacher here in the  
17 county for Surry County Public Schools. I'm also a  
18 20-year EMT volunteer firefighter and currently  
19 chief of the Surry Volunteer Rescue Squad and a life  
20 long resident here in the county.

21 I'm happy to be allowed to speak tonight  
22 regarding this application for Surry Units 1 and 2,  
23 subsequent license renewal.

24 Dominion Energy has operated here for

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1 nearly 50 years from its construction phase to  
2 present and I'm about the same age as of Thursday.

3 Being born and raised here, this plant  
4 as we've come to know it, has always been here and I  
5 fear nothing from it.

6 It has always been an absolute partner  
7 to the county and environmentally responsible.

8 For 20 years, I lived along the James  
9 River and could see the domes of Unit 1 and 2 from  
10 most rooms in my home. We always ate fish and have  
11 recreational activities free of any fear that was  
12 any environmental impact.

13 It's a part of life that benefits Surry  
14 County in many ways, and of course, the taxes  
15 contributed to our county is one of the biggest.

16 But, that's not all. Dominion Energy  
17 has become an embedded thread in Surry offering more  
18 than just their tax money. It offers employment  
19 opportunities to the citizens of our county and  
20 these jobs allow people to be able to stay here  
21 locally with their families while earning good  
22 wages.

23 Many of our own family -- my own family  
24 and friends have careers here at Dominion Energy and

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1 have for years.

2           These employees don't just work at  
3 Dominion, they're encouraged to and do give back to  
4 their community, either through their employment  
5 contributions to local, civic and volunteer  
6 organizations and groups or simply by volunteering  
7 their own time in those organizations.

8           Volunteering in community projects,  
9 constructing playground equipment at our local  
10 school just here recently.

11           Dominion Energy offers educational  
12 opportunities through its learning center with free  
13 programs to students as well as educators on energy  
14 sources, electricity and nuclear power.

15           Our elementary school fourth graders  
16 visit there each year and take advantage of seeing  
17 the models of the nuclear reactors and learn to  
18 generate their own power. They learn about the  
19 nuclear path from the beginning of mining of uranium  
20 to the responsibilities that it takes to produce  
21 clean and safe energy to the environment.

22           Surry school staff has participated in  
23 trainings that were free. We received free teaching  
24 materials that we can then use in our own classroom

SPS-5-1

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1 and we consider them great educational partners.

2 Dominion Energy has been a safety  
3 conscious workforce for many years. To my  
4 knowledge, there have been no large-scale  
5 emergencies causing any public safety or  
6 environmental concerns.

7 Being involved with the EMS at Surry  
8 Volunteer Rescue Squad member, past and present  
9 chief, I have worked closely on drill practices from  
10 radiological contaminations to medical emergencies  
11 as well as hostile actions which has been  
12 coordinated with local, state and governmental  
13 agencies.

14 The diligence that I have seen by  
15 Dominion Power to redesign, re-plan, to take into  
16 consideration new technologies and practices  
17 throughout the years has been impressive.

18 Dominion Energy works closely with Surry  
19 County's Emergency Management and those of  
20 surrounding areas as well as the individual fire and  
21 rescue departments to offer us trainings and  
22 planning for any and all emergencies.

23 Through all of my experiences, Dominion  
24 Energy continues to plan and evaluate and to follow

SPS-5-1

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1 its safety plan to the highest scrutiny and to take  
2 any and all corrective measures that they may have  
3 found or any advances that come along to plan in a  
4 very fluid manner for the future.

SPS-5-1

5 I personally have worked with and  
6 collaborated over the years with Dominion employees  
7 through and I feel confident and trust that they are  
8 the best at what they do and that they have the  
9 knowledge and expertise that is invaluable to the  
10 continuation of its safe and viable operation here  
11 in Surry County.

12 I ask for you to consider in favor of  
13 the subsequent 20-year renewal of Units 1 and 2.

14 MR. MUSSATTI: Thank you very much.

15 Okay, at this time, I would like to ask  
16 Helen Eggleston if she would like to come and make a  
17 comment?

18 MS. EGGLESTON: Yes, sir. I'd like to  
19 thank you guys for coming down and giving us an  
20 opportunity to speak concerning the renewal of  
21 license for Surry Nuclear.

SPS-6-1

22 I don't think I can improve on any of  
23 the positive comments that have been made. Every  
24 one of them is certainly true and I agree with them

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1 wholeheartedly.

2                   Surry Nuclear has employed members of my  
3 family, friends, neighbors and I know that they are  
4 very much approving of what has gone on and the  
5 safety issues that are there are not as great as  
6 some would believe.

SPS-6-1

7                   Concerning a previous speaker talking  
8 about the accidents that has happened at Surry  
9 Nuclear in times past, those types of accidents have  
10 happened in every, shall I say, industrial setting.  
11 It's a fact of life that unfortunate things happen,  
12 that accident happen, but it is by no means an  
13 indication that Surry Nuclear has been negligent in  
14 their training and their safety programs and the  
15 things that they have done to protect their  
16 employees and the environment and the people of this  
17 county.

SPS-6-2

18                   I am very much in favor of Surry Nuclear  
19 having their license extended for another 20 years.  
20 I think that Surry Nuclear has been a wonderful  
21 neighbor to this county and it has done everything  
22 it could to prevent accidents.

23                   I will hope that the Surry or the  
24 Nuclear Regulatory Commission will extend their

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1 license.

2 Thank you.

3 MR. MUSSATTI: Okay, thank you very  
4 much.

5 Back to the phones, India, is anybody  
6 interested in talking?

7 (NO RESPONSE)

8 MR. MUSSATTI: India?

9 (NO RESPONSE)

10 MR. MUSSATTI: I'll take that as a no.

11 Okay, Erica, would you like to speak  
12 again?

13 MS. GRAY: Sure.

14 MR. MUSSATTI: Please remember that this  
15 is an environmental meeting, every one of the points  
16 that you have brought up so far is a safety side  
17 issue and they won't -- nothing can be addressed in  
18 our environmental side from what you've got.

19 Have you got any environmental issues  
20 that you'd like to bring out?

21 MS. GRAY: Well, I'm not really sure how  
22 you can separate out environmental and safety  
23 particularly, but I just want to mention to this  
24 lady here, I don't believe that Dominion would want

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1       their employees to be hurt.

2                   I believe the NRC wants everybody to be  
3       safe, that was not my point. I was simply  
4       mentioning what has happened at Surry over time and  
5       the degradation of the plant because of aging.

SPS-3-5

6                   And, basically, the reason why this is  
7       all being looked at is because of the aging issue.  
8       This plant has been around for a long time, so some  
9       of this aging, they know the embrittlement is taking  
10      place, this has nothing to do with the employees not  
11      doing a good a job or Dominion trying to be careful.

12                  But, in particular, the pressure reactor  
13      vessel is old and the cracking that's taking place  
14      and they really don't know how to look at it. The  
15      specimens that they've put in the reactor were eight  
16      when they started. By the time it's over, they  
17      might have one. I don't know they need to come up  
18      with new methodology and new ways to be able to  
19      check for safety.

20                  Otherwise, we're riding in the dark.  
21      There's no way to really look at these parts.

22                  And a reactor vessel, you can't just  
23      replace. You can't climb inside and fix it. So, I  
24      have nothing against the employees. I'm glad their

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1 good neighbors here.

2 My problem is we can't just go by a  
3 generic GAL, we have to go by the numbers and  
4 Dominion should be allowed to get this extension  
5 without actually having to do the reviews, the  
6 inspections. That needs to be done.

7 And I don't see how you can separate out  
8 that to the environmental because, if we have a  
9 through wall crack, it will become an environmental  
10 issue very quickly.

11 Thank you.

12 MR. MUSSATTI: Okay, thank you for that  
13 clarification.

14 We do have one more speaker in the  
15 audience that had signed up, that's Michael  
16 Eggleston.

17 MR. EGGLESTON: That's spelled E-G-G-L-  
18 E-S-T-O-N.

19 Having worked previously in the industry  
20 and the service, what she was referring to on the  
21 erosion of pipe is called impingement and it's from  
22 moisture trapped in high pressure steam and it most  
23 likely occurs at the elbow, just to correct the  
24 record.

SPS-3-5

SPS-7-1

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1           Most nuclear power plants use ultrasound  
2           and continuously examines pipe thickness to prevent  
3           such things as this.

SPS-7-1

4           The nuclear power industry, you can't  
5           just take quotes for the nuclear power industry  
6           without looking at high pressure steam plants  
7           elsewhere. They both use high pressure steam. So,  
8           you need to use both of them in context, not just  
9           separate and have nuclear power.

10           I lived in Surry County when the power  
11           plant was -- the reactors were being brought up from  
12           the river, so I've been here every since they began.

13           Nuclear power is the most reliable and  
14           less carbon intensive. I don't know where you're  
15           getting the statement that it's highly carbon  
16           intensive.

SPS-7-2a

17           If you take away the government  
18           subsidies for the other power, wind and solar, they  
19           are no longer that cheap. So I'm in favor of the  
20           Surry Nuclear continuing on because they replace  
21           reactor heads, they've replaced control rod  
22           assemblies, they've replaced steam generators.

SPS-7-2b

23           To come in here without knowing the  
24           actual history of what's been replaced from

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1 something you read online really doesn't cut it.

2 Thank you.

3 MR. MUSSATTI: Okay, thank you, sir.

4 And, as we were starting out this  
5 meeting, I noticed that a number of people had come  
6 in late. There's nothing wrong with that, you can  
7 come in late. Did you sign up, first of all, on the  
8 sign up sheet that's outside? If you haven't, on  
9 your way out, please do so, so we can have an  
10 accurate record of who was here.

11 And is anybody in the room have the  
12 spirit move them to the point where they would like  
13 to speak and hadn't signed up on a yellow card?

14 Okay.

15 MS. LITTLE: Do I need to come up?

16 MR. MUSSATTI: Yes, ma'am, you do. You  
17 missed the part where I said that we had these two  
18 microphones aimed here to be able to speak  
19 effectively.

20 MS. LITTLE: Good evening. My name's  
21 Judy Little and I'm an elected official here in  
22 Surry County.

23 And, actually, the power plant is in my  
24 district. So, I represent Dominion Power in that.

SPS-8-1

1                   But, Dominion Power has been a wonderful  
2 partner, a wonderful neighbor.

3                   We haven't had any problems as I know  
4 that have been identified as something that is  
5 unsafe. And I want you all to know that Surry  
6 County appreciates you being here.

7                   And, I also know that they are also  
8 looking into other safe ways of providing power for  
9 Surry and other places.

10                  And so, I think it's a great thing that  
11 Surry has such a privilege to be called the home of  
12 Dominion Power.

13                  Thank you.

14                  MR. MUSSATTI: Thank you very much.

15                  If there aren't any more comments here,  
16 we're going to move on to the closing of this  
17 meeting because everybody's got important things to  
18 do.

19                  One last chance, anybody in the room who  
20 would like to speak?

21                  I'll give you three more minutes. This  
22 is Erica, again.

23                  MS. GRAY: I just want to make a  
24 clarification.

SPS-8-1

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1 I agree with what you're saying about  
2 the elbows and whatnot, but what I'm talking about,  
3 I'm talking about embrittlement of the reactor  
4 itself, the part that's not replaceable.

5 MR. EGGLESTON: That's a non-starter.

6 MS. GRAY: It might be a non-started,  
7 but these guys know the documents I'm talking about.  
8 I attend the other meetings. I'm talking about the  
9 documents I'm coming from are not just off the  
10 internet, I attend the meetings. Roger is very  
11 familiar with me. I'm in contact.

12 I'm not reading all the stuff off the  
13 internet, sir, I am actually reading documents from  
14 Dominion and from the NRC and have been involved for  
15 many years.

16 So, I'm not just making up stuff.

17 MR. EGGLESTON: Do you ever work in the  
18 industry?

19 MS. GRAY: No, I do not work in the  
20 industry and I don't get paid for what I do either.  
21 This is simply a hobby of mine as it goes for  
22 energy. I do want clean, safe energy but I'm saying  
23 that the biggest issue I have with Surry as well as  
24 North Anna is we need a program to make sure these

Comment is  
intended for  
other  
commenters, not  
NRC. The staff  
does not  
respond to this  
comment.

SPS-3-6

SPS-3-6

1 reactors are safe because of the aging problems.

2 The industry is very familiar with and  
3 the NRC, that's why they're looking at these issues  
4 of embrittlement and the other erosion issues.

5 That's all I have to say.

6 Thank you.

7 MR. MUSSATTI: All right, thank you,  
8 again.

9 All right, one more time to the phones.  
10 India, is there anybody on the phone that would like  
11 to make a comment?

12 (NO RESPONSE)

13 MR. MUSSATTI: Okay, before I trip over  
14 a cords and hurt myself, I'm going to begin with the  
15 closing comments and then I'm going to introduce Ben  
16 Beaseley in a second so that he can come forward and  
17 officially close the meeting.

18 But, before I -- we get to that point, I  
19 want to remind you that if you haven't signed in,  
20 please do so. We need to have that done.

21 We're always looking to improve the way  
22 that we do our meetings, the way that it's set up,  
23 the way that we, you know, the order that we do  
24 things and all of that.

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## PUBLIC SUBMISSION

SUNSI Review Complete  
Template = ADM-013  
E-RIDS=ADM-03  
ADD=Eric Oesterle, Tam  
Tran, Barbara Hayes

COMMENT (5)  
PUBLICATION DATE:  
12/20/2018  
CITATION 83 FR 65367

As of: 1/25/19 8:21 AM  
Received: January 20, 2019  
Status: Pending Post  
Tracking No. 1k3-97sn-ycb1  
Comments Due: January 22, 2019  
Submission Type: Web

Docket: NRC-2018-0280

Virginia Electric and Power Company; Dominion Energy Virginia: Surry Power Station, Unit Nos. 1 and 2

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-0005

Comment on FR Doc # 2018-27547

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### Submitter Information

Name: DAVID MARTIN

Address:

12225 Robertson st

Chester, VA, 23831

Email: dmartin402@aol.com

---

### General Comment

Pushing Surry Nuclear Power Stations Permit out to 80 years Will Never Be Safe or a good Idea

SPS-9-1

David S Martin

**From:** [Frank](#)  
**To:** [Tran, Tam](#)  
**Subject:** [External\_Sender] Surry  
**Date:** Sunday, January 13, 2019 1:06:47 PM

---

The Upper Mattaponi Tribe has no questions at this time about the renewal of permits for the Surry plant

W. Frank Adams  
Chief  
Upper Mattaponi Indian Tribe  
PO Box 184  
King William, Virginia 23086  
(804) 769-0041

SUNSI Review Complete  
Template = ADM-013  
E-RIDS=ADM-03  
ADD=Eric Oesterle, Tam Tran, Barbara  
Hayes

COMMENT (9)  
PUBLICATION DATE: 12/20/2018  
CITATION 83 FR 65367

SPS-10:  
Commenter has  
no comment.  
The staff does  
not respond to  
this item.

SUNSI Review Complete  
Template = ADM-013  
E-RIDS=ADM-03  
ADD=Eric Oesterle, Tam  
Tran, Barbara Hayes

## PUBLIC SUBMISSION

COMMENT (2)  
PUBLICATION DATE:  
12/20/2018  
CITATION 83 FR 65367

As of: 1/16/19 9:11 AM  
Received: January 14, 2019  
Status: Pending Post  
Tracking No. 1k3-97od-zdpx  
Comments Due: January 22, 2019  
Submission Type: Web

Docket: NRC-2018-0280

Virginia Electric and Power Company; Dominion Energy Virginia: Surry Power Station, Unit Nos. 1 and 2

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-0002

Comment on FR Doc # 2018-27547

---

### Submitter Information

Name: Scott Burger

Address:

612 S. Laurel Street  
Richmond, VA, 23220

Email: scottburger@mac.com

---

### General Comment

I am very much against renewing this license. I don't think its safe. I don't know evacuation plans if there is an emergency. This facility will likely become even more vulnerable to sea level rise and storms in the future. It's already a terrorist target. I am concerned about the wastes that are being produced. Distributed solar and wind energy offer better, safer, and cleaner alternatives.

SPS-11-1

SUNSI Review Complete  
 Template = ADM-013  
 E-RIDS=ADM-03  
 ADD=Eric Oesterie, Tam  
 Tran, Barbara Hayes

## PUBLIC SUBMISSION

COMMENT (3)  
 PUBLICATION DATE:  
 12/20/2018  
 CITATION 83 FR 65367

As of: 1/16/19 9:12 AM  
 Received: January 14, 2019  
 Status: Pending Post  
 Tracking No. 1k3-97og-1i0s  
 Comments Due: January 22, 2019  
 Submission Type: Web

Docket: NRC-2018-0280

Virginia Electric and Power Company; Dominion Energy Virginia: Surry Power Station, Unit Nos. 1 and 2

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-0003

Comment on FR Doc # 2018-27547

### Submitter Information

Name: Kay Patrick

### General Comment

Docket ID NRC-2018-0280

The thought of having the Surry reactors certified for another twenty years frightens me. This seems totally irresponsible and perhaps is just a formality to underwrite Dominion's stock performance instead of an honest scientific assessment. As we are only into seven years of the current twenty year renewal, this seems premature and highly speculative.

SPS-12-1

As I understand it, the required physical on site tests to support this extension till 2032 are still unfinished. Obviously your Generic Lessons Learned Report (GALL) is a useful tool, but no replacement for any site specific inspection or testing of materials.

SPS-12-2

I am not a nuclear scientist and must rely on your experts to make these assessments, but it is clear in your documents, this is not happening in a timely manner. The Surry NPP is one of many unique installations with its own challenges. As a citizen observer, there are many questions I have about the situation of this facility and how they are being addressed.

Surry is situated on an island of marsh land in a confluence of brackish water, highly exposed to harsh weather conditions and a constantly evolving shoreline in an area that has seen drastic change over a short period of time. It is hard to imagine it is different there from the more populated points that are being subsumed periodically and some permanently. When projecting thirty two years into the future, that the site will remain up on dry land seems highly speculative.

SPS-12-3

Also the matter of corrosive brackish water could be a factor in the wearing of parts. Metals oxidize, concrete

SPs-12-4

absorbs moisture and releases it changing its character yearly, insulated wires and hoses subject to temperature extremes, moisture and rodents; so many things to evaluate constantly, but to project a safe future projected thirty years forward on extrapolation seems highly suspect. There is no way to do this, it is not reasonable to anticipate that data now will be consistent with real time change.

SPS-12-4

The biggest concern is the quality of the reactor vessel. This was engineered to have a life of forty years. When it was made, there was no data on how the metal would react to the stress of heat and corrosion in the presence of nuclear fuels. I understand there are samples that are pulled and inspected periodically. This would be a linear observation, but is there assurance there is not an exponential degradation that would create a danger of failure in doubling the length of service? This guess that it will remain sound for twice the length of prescribed time into the future is questionable.

Pre-qualifying this NPP for such a drastic period at this time seems irresponsible, and I would prefer any extension of service be delayed till there are more site specific physical inspections and testing over time.

Matthew J. Strickler  
Secretary of Natural Resources

Clyde E. Cristman  
Director



COMMONWEALTH of VIRGINIA  
DEPARTMENT OF CONSERVATION AND RECREATION

Rochelle Altholz  
Deputy Director of  
Administration and Finance

Russell W. Baxter  
Deputy Director of  
Dam Safety & Floodplain  
Management and Soil & Water  
Conservation

Thomas L. Smith  
Deputy Director of Operations

January 16, 2019

Tam Tran  
Nuclear Regulatory Commission  
Office of Nuclear Reactor Regulation  
Washington, DC 20555

Re: NRC-2018-0280, Surry Power Station Units 1 and 2 License Renewal

Dear Mr. Tran:

The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

According to the information currently in our files, the Atlantic sturgeon (*Acipenser oxyrinchus*, G3/S2/LE/LE) has been documented adjacent to the project site and the Ohio River shrimp (*Macrobrachium ohione*, G4/S1/NL/NL) has been historically documented adjacent to the project site. The Atlantic sturgeon is a large fish that reaches a maximum length of about 4.3 meters and may live for several decades. The adults migrate between fresh water spawning areas and salt water non-spawning areas. They feed primarily on benthic invertebrates and small fishes as available.

Stocks on the Atlantic slope have been severely reduced by overfishing (mainly late 1800s and early 1900s), pollution, sedimentation, and blockage of access to spawning areas by dams (Gilbert 1989, Burkhead and Jenkins 1991, Marine and Coastal Species Information System 1996). In Chesapeake Bay and elsewhere in the range, hypoxic events have increased and may degrade nursery habitat for Atlantic sturgeon (Secor and Gunderson 1997). Habitat loss due to dam construction and water pollution are thought to be major factors impeding full recovery of populations (Smith 1985, cited by Johnson et al. 1997; Gilbert 1989). A late maturation age and use of estuaries, coastal bays, and upstream areas of rivers for spawning and juvenile development make stocks vulnerable to habitat alterations in many areas (NatureServe 2012). Please note that this species is currently classified as endangered by the National Oceanic and Atmospheric Administration National Marine Fisheries Service (NOAA Fisheries) and by the Virginia Department of Game and Inland Fisheries (VDGIF).

The Ohio River shrimp is known from large rivers of the Mississippi River drainage, and the James River (NatureServe, 2009). It occurs in lower salinity and tidal freshwater areas that have low velocity water (Conaway and Hrabik, 1997). They prefer borders of main channels especially when the borders are flooded and plant and animal material are available for foraging (Truesdale and Mermilliod, 1979). Ohio River shrimp occupy low visibility physical habitats that are also occupied by predatory fishes such as Catfish (Barko and Herzog, 2003) and use flooded terrestrial habitats for reproduction (Hobbs, 2001).

SPS-13-1

SPS-13-2

600 East Main Street, 24<sup>th</sup> Floor | Richmond, Virginia 23219 | 804-786-6124

State Parks • Soil and Water Conservation • Outdoor Recreation Planning  
Natural Heritage • Dam Safety and Floodplain Management • Land Conservation



Threats to this species include waterway channelization, habitat and wetland loss, changes in river physiography, and reduced connectivity to floodplains (Logsdon, 1993; Hobbs, 2001; Barko and Herzog, 2003).

SPS-13-3

Due to the legal status of the Atlantic sturgeon, DCR recommends coordination with NOAA Fisheries and Virginia's regulatory authority for the management and protection of this species, the VDGIF, to ensure compliance with protected species legislation.

SPS-13-4a

Please note this project is within a section of the James River that has been designated as a scenic river in the state of Virginia. Due to this designation, DCR recommends you contact Lynn Crump of the DCR-Division of Planning and Recreational Resources at 804-786-5054 or [Lynn.Crump@dcr.virginia.gov](mailto:Lynn.Crump@dcr.virginia.gov).

SPS-13-4b

Due to the legal status of the Atlantic sturgeon, DCR recommends coordination with NOAA Fisheries and Virginia's regulatory authority for the management and protection of this species, the VDGIF, to ensure compliance with protected species legislation.

SPS-13-5

There are no State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the DCR, DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. The current activity will not affect any documented state-listed plants or insects.

SPS-13-6

New and updated information is continually added to Biotics. Please re-submit project information and map for an update on this natural heritage information if the scope of the project changes and/or six months has passed before it is utilized.

The VDGIF maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in this letter. Their database may be accessed from <http://vafwis.org/fwis/> or contact Ernie Aschenbach at 804-367-2733 or [Ernie.Aschenbach@dgif.virginia.gov](mailto:Ernie.Aschenbach@dgif.virginia.gov). This project is located within 2 miles of a documented occurrence of a state listed animal. Therefore, DCR recommends coordination with the VDGIF, Virginia's regulatory authority for the management and protection of this species to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 - 570).

Should you have any questions or concerns, please contact me at 804-225-2429. Thank you for the opportunity to comment on this project.

Sincerely,



Tyler Meader  
Natural Heritage Locality Liaison

CC: Christine Vaccaro, NOAA Fisheries-Protected Species Division  
Amy Ewing, VDGIF  
Lynn Crump, DCR-DPRR

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My name is Fred Mladen, the site vice president at Surry Power Station. I would like to thank the U.S. Nuclear Regulatory Commission for holding this important meeting to accept public comments on Dominion Energy's application to renew the licenses of the two Surry units for a second 20-year term.

Nuclear energy is by far the largest source of carbon free energy both in Virginia and the nation. It is a key aspect of any reasonable clean energy strategy. Operation of Surry Power Station and other nuclear stations – which produce no greenhouse gasses – is critical for the further build-out of zero-carbon renewables, which generate power, but intermittently.

Surry Power Station is one of the top performing stations in the United States, as measured by the NRC and the nuclear industry. The two nuclear units at Surry produce about 15 percent of the electricity Dominion Energy provides to its customers in Virginia. In addition, the station is an economic engine in the Hampton Roads area.

We take great pride that our station provides safe, reliable and affordable energy that is vital to the economic growth of the Commonwealth, and provides well-paying jobs for more than 800

SPS-14-1

SPS-14-2

employees, and millions of dollars in taxes to Surry County. Taxes paid by the station support schools and important public services, and the salaries earned by our colleagues who work at the station go directly to the purchase of goods and services in the local economy.

SPS-14-2

Surry Power Station has maintained excellent compliance with environmental standards, research, and permitting. In addition,, we work in concert with the neighboring Virginia Department of Game & Inland Fisheries' on the Hog Island Wildlife Management Area. Environmental monitoring is continuous, consultations with natural and historical resources agencies are ongoing in support of subsequent license renewal, and we continue to report environmental results in keeping with regulatory requirements and Dominion Energy's Environmental Stewardship Policy.

SPS-14-3a

SPS-14-3b

The subsequent license renewal of Surry Power Station, whose current licenses for units 1 and 2 will expire in 2032 and 2033, respectively, will ensure that the facility will continue to provide not only electricity to our customers into the mid-century, but employment for the people who support its operation. Renewed licenses for Units 1 and 2 will mean that the units may continue to provide safe, reliable and affordable electricity to 2052 and 2053, respectively.

SPS-14-4

As the NRC staff will discuss tonight, License renewal is a very thorough process governed by federal regulations and backed by significant research into the effects of aging on equipment, along with a rigorous program of tests and inspections. The effectiveness of our ability to manage the long term operation of these units is demonstrated by the fact that after more than 45 years of operation, our reactors at Surry are performing at very high levels of safety and reliability.

SPS-14-5

Moreover, The Electric Power Research Institute and the U.S. Department of energy have conducted extensive scientific research to understand the technical aspects associated with the safe, long-term operation of nuclear power plants. This research has shown that there are no generic technical issues that would prevent a well-maintained nuclear power plant, such as Surry, from operating safely during the subsequent license renewal period.

Dominion Energy has performed extensive technical evaluations - using the insights of the various industry research groups as well as NRC regulations and guidance documents – to demonstrate in our application submittal that Surry Power Station can be operated safely for 20 additional years.

Again, Dominion Energy is committed to safe and reliable operation today and every day.

I appreciate the opportunity to speak to you tonight in support of Surry operating for 20 additional years.

SPS-14-5



Franklin-Southampton Area  
Chamber of Commerce  
*Serving the community since 1954*  
P.O. Box 531  
Franklin, VA 23851

January 7, 2019

To: Whom It May Concern  
U.S. NRC

On behalf of the Franklin-Southampton Area Chamber of Commerce Board of Directors we echo the remarks made by Bryan Stephens, President and CEO of the Hampton Roads Chamber.

As a neighboring community and as a member of the Hampton Roads Chamber Alliance we strongly support Dominion's application to operate its two nuclear reactors at Surry Power Station for an additional 20 years. The energy generated at this facility supplies customers throughout our region. The availability of this clean energy is of the utmost importance when recruiting businesses to locate or expand in our community.

We appreciate your consideration of this request and ask that this application be approved.

Sincerely,

Teresa B. Beale, IOM  
Executive Director

SPS-15-1



Means Business

500 East Main Street,  
Suite 700, Norfolk, VA 23510  
757.622.2312  
HamptonRoadsChamber.com

**Proposed Remarks for Hampton Roads Chamber of Commerce  
U.S. NRC Public Meeting – Surry SLR  
Tuesday, January 8, 2019 (DRAFT 1-3-2019)**

Thank you for the opportunity to express the Hampton Roads Chamber's strong support for Dominion Energy's application to operate its two nuclear reactors at Surry Power Station for an additional 20 years.

The Chamber works hard to build a stronger economy for the Hampton Roads localities and provide new opportunities for the men and women of our communities. And we believe Surry Power Station – if it is allowed to continue to operate – will play a key role in building that stronger Hampton Roads economy into the middle of the 21<sup>st</sup> Century.

I believe I can sum up Surry's benefits for our region in three words: energy, economy and environment. Please allow me to take a few moments to explain.

First, energy.

A very large portion of the electricity that Dominion Energy provides to customers in the Hampton Roads area is generated at Surry Power Station. That's been the case for many decades. In fact, statistics that I've seen show that as much as one-third of the energy delivered to customers by Dominion Energy in the Commonwealth is generated by nuclear power, at the Surry plant and also at the North Anna facility in Louisa County.

Since it began operation in the 1970s, Surry has built an admirable record of operations and has been consistently recognized as one of the best-run nuclear facilities in the U.S....with the recognition coming from the NRC, publications that cover the nuclear industry, and organizations within the industry itself. Outside of periods of maintenance, it operates on a 24/7 basis.

SPS-16-1

The people and businesses of Hampton Roads can be confident its energy is there when they need it. And given the recent closure of some older, coal-fired plants in the Hampton Roads area, Surry's role in assuring sufficient power supplies for our region is more important than ever. The Skiffes Creek transmission project crossing the James River is evidence of this importance. The Skiffes Creek line will provide a new, direct link to carry power from Surry to the Peninsula, with its huge concentration of military bases, shipyards and defense contractors.

The assurance of energy security is a critical decision-making point for industries and businesses thinking of relocating to Hampton Roads or expanding their operations. It's very difficult to see how that high level of energy reliability can be maintained without Surry. The Chamber believes it must keep operating.

Our second point centers on the word "economy" – specifically, the major role Surry already plays in the economic life of Hampton Roads.

The Surry Power Station has been called an "economic engine" for the Hampton Roads area, and I believe that's no overstatement. The plant provides employment to hundreds of highly-skilled men and women, with an annual payroll of more than \$80 million. In and of itself, that's a very impressive figure. But the wages have even more impact on the Hampton Roads area as the workers spend their earnings, boosting many other business sectors and operations such as retail stores and service providers.

With the approval of Dominion Energy's application, the "economic engine" of Surry would continue running – and boosting the Hampton Roads economy – for years to come.

Our final point focuses on the word "environment."

In short, Surry Power Station is good for the environment...for the quality of the air we breathe in Hampton Roads...and for our region's continued movement to a lower-carbon environment and economy.

It's been said many times that nuclear power is the largest existing source of clean energy for the Commonwealth. Surry and its sister facility at North Anna produce no air emissions. Of course, that includes producing no greenhouse gas emissions. Obviously, that promotes better air quality, not only for Hampton Roads but for all of Virginia...and beyond. If we're truly committed to clean air, nuclear energy -- including Surry -- must continue to play a major role in power generation.

Surry's continued operation is also vital to the continued expansion of renewable resources -- including solar and wind power -- to generate electricity. Virginia has made great strides in putting these renewable forms of energy to work. And even bigger things are expected in the future -- for example, the possible development of very large wind farms just off our coastline.

But, as has been noted many times, these units need support. Obviously, they cannot operate all the time. They are not available on a 24/7 basis...the sun obviously does not shine at night and at times the wind fails to blow.

SPS-16-2



But when these units are idled, Surry will be able to step in and provide the power that homes and businesses need to keep going. For our renewable sector to continue to develop and grow, the continued operation of Surry is indispensable.

For all these reasons, the Hampton Roads Chamber respectfully asks the Commission to approve Dominion Energy's application. Surry has served our communities well in the past. And we are sure it can continue to do so for decades into the future. Thank you.



Bryan K. Stephens  
President and CEO  
Hampton Roads Chamber

STRATEGIC PARTNERS

ABNB • ADP • Bank of America • BB&T • Bon Secours Virginia Health System • Chesapeake Regional Healthcare • Clark Nexsen • Cox Communications • Dominion Energy • GEICO • Hampton Roads Workforce Council • Langley Federal Credit Union • Norfolk Southern Corp. • Norfolk State University • Old Dominion University • Old Point National Bank • Optima Health • Verizon • Virginia Media • Sentara Healthcare Southern Bank • STHL • SunTrust • The Port of Virginia • TowneBank • Walmart Stores, Inc. • Wells Fargo



phone 757 627 2315  
toll-free 800 423 5050  
fax 757 623 3081  
url hreda.com

Friday, January 4, 2019

RE: U.S. Nuclear Regulatory Commission Public Meeting – Surry Subsequent Relicensing

To Whom It May Concern:

The Hampton Roads Economic Development Alliance represents and partners with our region's localities, businesses and other institutions to promote the growth and expansion of the Hampton Roads economy and create new job opportunities for the people of our communities.

As Interim President & CEO of the Alliance I would like to express our strong support for Dominion Energy's application for an additional 20 years of operation for both of its nuclear units at Surry Power Station.

In order to grow and thrive, Hampton Roads must have secure, reliable, affordable and environmentally sound sources of energy. We are very fortunate to have a facility that meets this description just a few miles away – Surry Power Station. For many years its electric output has helped ensure that the Hampton Roads communities have the energy they need, whenever they need it.

Surry's operating record over the decades has been outstanding. In fact, it is rated as one of the top performers in the U.S. nuclear industry, as measured by both the NRC and organizations within the nuclear energy industry.

And its role in supplying the homes and businesses of Hampton Roads – as well as the many vital defense facilities that form so important a part of our communities – will be even greater in the future. Its importance is magnified by the fact that several large generating facilities powered by coal have been shut down for environmental reasons in the last few years. That makes Surry an even more crucial part of the Hampton Roads energy picture. In fact, the construction of the Skiffes Creek transmission line across the James River will help ensure that the Peninsula – with its critical defense facilities and contractors – will have new, direct access to the power supplied by Surry.

Additionally, we can't overestimate the role the station itself plays in the Hampton Roads economy. It employs hundreds of skilled workers and has an annual payroll of about \$80 million – money that goes directly into the regional economy and supports a wide variety of businesses and services.

SPS-17-1



phone 757 627 2315  
toll-free 800 423 5068  
fax 757 623 3081  
uri hreda.com

To attract new businesses and industries in this century, Hampton Roads needs more than reliable and affordable energy.

It needs clean energy as well.

Surry will play a tremendous role in making sure the Hampton Roads energy supply fits that description.

First, it's already the largest source of clean energy in the region. It produces zero emissions – including zero carbon emissions. If we are continuing our transition to a lower carbon environment, we must keep Surry and other nuclear facilities operating.

Second, it will support development of generation powered by renewable resources, such as the sun and wind. They will play a huge role in supplying energy to Hampton Roads in the future. But their output is intermittent – they can't operate all the time.

And when they can't produce, other sources of clean power must be available. And for Hampton Roads, the best source of clean energy available on a 24/7 basis is undoubtedly Surry.

So, for all these reasons, the Alliance supports Dominion Energy's application. We urge the Commission to approve it, and we appreciate the opportunity to share our views with you.

Sincerely,

Robert S. Herbert  
Interim President & CEO

SPS-17-1

SPS-17-2



KENNETH C. ALEXANDER, CHAIR · DONNIE R. TUCK, VICE-CHAIR · SHEILA S. WILSON, TREASURER

CRAIG R. QUIGLEY, EXECUTIVE DIRECTOR · RICHARD E. DWYER, SECRETARY

January 8, 2019

**TO WHOM IT MAY CONCERN**

**Subj: Extension of Operating License for the Surry Power Station**

On behalf of the Hampton Roads Military and Federal Facilities Alliance, I would like to voice my organization's strong support for Dominion Energy's application to operate its two nuclear units at Surry Power Station for an additional 20 years. This extension would ensure that Surry continues to provide clean, reliable and affordable supplies of energy to the many Federal facilities and military installations in the Hampton Roads area into the second half of the 21<sup>st</sup> Century.

My organization is dedicated to doing all that we can to preserve these Federal installations that are so important to Hampton Roads - and to our nation's defense and security, as well as the regional and Commonwealth economies.

We strongly believe that a reliable supply of electricity is a key ingredient for maintaining and retaining these vital facilities, and for promoting the health and growth of the entire Hampton Roads economy. Surry Power Station has played a major role in ensuring a high level of energy reliability for these installations for many years. It's no overstatement to say that much of our national defense and security depends on Surry.

No one can deny that the station's track record has been impressive. I understand that one-third of the power that Dominion Energy provides to its customers here in Virginia is produced using nuclear energy, at Surry and also at the North Anna Power Station in Louisa County.

Surry is also one of the top-performing nuclear stations in the United States, according to the Nuclear Regulatory Commission and to organizations that monitor the nuclear industry. And studies by the Electric Power Research Institute, the U.S. Department of Energy, and Dominion Energy itself indicate this well-maintained station can continue to operate safely and efficiently for decades to come.

All the evidence suggests that Surry will play an even greater role in providing Hampton Roads and its military bases with clean, reliable power in the future.

SPS-18-1



723 Woodlake Drive · Chesapeake, Virginia 23320 · Office (757) 644-6324 · Fax (757) 523-4881

Surry's output has become more important than ever with the closure of some of the older, fossil-fueled generating plants in our region. In fact, one of the main purposes of the Skiffes Creek transmission line across the James River is to make Surry's output more available to the Peninsula, home of many important Federal installations and contractors.

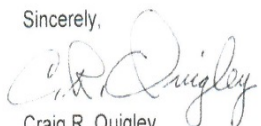
The Alliance is also well aware of the Department of Defense's commitment to the environment, and to the development of "greener" sources of energy. Continuing to operate Surry is completely consistent with those goals.

- First, it produces zero emissions as it generates electricity. This important source of electricity must be maintained as Virginia and our nation move into a lower carbon future.
- Second, Surry will provide vital support for the development of power generation based on renewable energy, such as solar energy and offshore wind. As clean and valuable as these resources are, they cannot produce electricity around the clock. When these sources of renewable energy can't operate, Surry will be there to back them up and meet our region's energy needs. I don't think it's an exaggeration to say that the continued development of renewable resources in Virginia depends in large part on Surry's continued operation.

SPS-18-2

On behalf of the Alliance, I ask the Commission to favorably consider Dominion Energy's application for Surry's subsequent license renewal.

Sincerely,



Craig R. Quigley  
Rear Admiral, U.S. Navy (Ret.)  
Executive Director



SUNSI Review Complete  
 Template = ADM-013  
 E-RIDS=ADM-03  
 ADD=Eric Oesterie, Tam  
 Tran, Barbara Hayes

COMMENT (1)  
 PUBLICATION DATE:  
 12/20/2018  
 CITATION 83 FR 65367

## PUBLIC SUBMISSION

As of: 1/16/19 9:07 AM  
 Received: January 12, 2019  
 Status: Pending Post  
 Tracking No. 1k3-97n7-c3em  
 Comments Due: January 22, 2019  
 Submission Type: Web

**Docket:** NRC-2018-0280

Virginia Electric and Power Company; Dominion Energy Virginia: Surry Power Station, Unit Nos. 1 and 2

**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-0001

Comment on FR Doc # 2018-27547

### Submitter Information

**Name:** Erica Gray

**Address:**

406 Glendale Dr

Henrico, VA, 23229

**Email:** veggielady@yahoo.com

### General Comment

NRC-2018-0280

Re: Scoping of the Surry Power Station Environmental Review.

The environmental review can not be separated from the safety review. They are inextricably connected. For example: The dominant and expected type of change in the reactor pressure vessel is embrittlement under neutron irradiation of the RPV, especially in the core (beltline) area. If the embrittled RPV was to have a flaw of critical size and certain transients were to occur, the flaw could propagate very rapidly through the vessel, possibly resulting in a through wall crack and challenging the integrity of the RPV.

Thus becoming an environment issue.

As Surry NPP gets older, there is an increased probability of malfunctions and serious accidents occurring. The NRC and the nuclear power industry are aware of reactor pressure vessel embrittlement, irradiation assisted stress corrosion cracking of reactor internals, concrete structures and containment degradation and other components such as cables and buried piping, all associated with ageing.

Yet over the years the NRC has approved many relief requests, exemptions, amendments and changes to the original license for Dominion's operation of Surry unit 1 and 2.

All of this information must be compiled, reviewed and made public.

SPS-19-1

Furthermore, the subsequent license renewal of Surry NPP needs to be based on thorough site specific inspections and validated tests, not just by using the Generic Lessons Learned Report (GALL)

Site specific data and corresponding tests that were done years ago are not adequate in considering an additional 20 years license extension. After all, Dominion is only 7 years into their first license renewal that expires in 2032/2033.

Also It appears that commitments made for the 1st license renewal still have not been completed and or fully met.

Yet the NRC has stated they expect to approve of subsequent license renewal for Surry NPP in 18 months. This is not acceptable.

This document just represents one relief request, out of many:

April 25, 2012

VIRGINIA ELECTRIC AND POWER COMPANY (DOMINION)  
SURRY POWER STATION UNITS 1 AND 2  
ASME SECTION XI INSERVICE INSPECTION (ISI) PROGRAM  
REQUEST FOR ALTERNATIVE - IMPLEMENTATION OF EXTENDED  
REACTOR VESSEL INSERVICE INSPECTION INTERVAL  
RELIEF REQUESTS CMP-007 AND CMP-009

Dominion proposes to perform the fourth 10-year ISI interval examination of the Surry Units 1 and 2 RVs in 2023 and 2024 in lieu of 2013 and 2014, respectively. To support the alternate RV inspection interval of 20 years for Surry Units 1 and 2, Dominion requests approval of Relief Requests CMP-007 and CMP-009 by May 30, 2013.  
<https://www.nrc.gov/docs/ML1213/ML12130A217.pdf>

The NRC needs to verify and validate that all the commitments made by Dominion for their current/1st license renewal are completed and that new inspections and tests are done to ensure the soundness and safety of both units prior to moving forward with a review for a subsequent license renewal.

Thank you,

Erica Gray

SPS-19-1

SUNSI Review Complete  
 Template = ADM-013  
 E-RIDS=ADM-03  
 ADD=Eric Oesterle, Tam  
 Tran, Barbara Hayes

## PUBLIC SUBMISSION

COMMENT (6)  
 PUBLICATION DATE:  
 12/20/2018  
 CITATION 83 FR 65367

As of: 1/25/19 8:23 AM  
 Received: January 21, 2019  
 Status: Pending\_Post  
 Tracking No. 1k3-97t5-6dfa  
 Comments Due: January 22, 2019  
 Submission Type: Web

Docket: NRC-2018-0280

Virginia Electric and Power Company; Dominion Energy Virginia: Surry Power Station, Unit Nos. 1 and 2

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-0006

Comment on FR Doc # 2018-27547

### Submitter Information

Name: Glen Besa

Address:

4896 Burnham Rd

North Chesterfield, 23234

Email: glenbesa@gmail.com

### General Comment

I am objecting to the relicensing of the Surry 1 and 2 as premature.

The Surry nuclear plant's two reactors were first licensed for 40 years in 1972 and 1973, due to expire in 2012-2013. In 2003 Dominion secured a 20 year license renewal through 2033 and 2034.

Right now, only 5 years into its new license and 15 years prior to that renewed license expiration, Dominion is already seeking a second 20 year renewal from the Nuclear Regulatory Commission (NRC). I also understand that critical tests that are needed to as the integrity of Surry 1 and 2, in particular related to the pressure vessel have been delayed.

Any consideration of a second renewal period should be delayed until the fitness of the reactors can be assessed further into its first renewal period.

Thank you,  
 Glen Besa

SPS-20-1



SUNSI Review Complete  
 Template = ADM-013  
 E-RIDS=ADM-03  
 ADD=Eric Oesterle, Tam  
 Tran, Barbara Hayes

## PUBLIC SUBMISSION

COMMENT (7)  
 PUBLICATION DATE:  
 12/20/2018  
 CITATION 83 FR 65367

As of: 1/25/19 8:27 AM  
 Received: January 22, 2019  
 Status: Pending Post  
 Tracking No. 1k3-97tv-g6va  
 Comments Due: January 22, 2019  
 Submission Type: Web

Docket: NRC-2018-0280

Virginia Electric and Power Company; Dominion Energy Virginia: Surry Power Station, Unit Nos. 1 and 2

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-0007

Comment on FR Doc # 2018-27547

### Submitter Information

Name: Scott Price

Organization: Alliance for a Progressive Virginia

### General Comment

The Alliance for a Progressive Virginia strongly opposes a further extension of the license of the Surry NPP.

It is clear that these reactors were never designed to remain in operation for such long periods of time. The NRC is aware of the issues concerning aging facilities including reactor vessel embrittlement, irradiation assisted stress-corrosion cracking of reactor internals and degradation of concrete structures, electrical cables and buried pipes. We are deeply concerned that the NRC is using a one size fits all approach to relicensing Surry NPP for an additional 20 years. We believe it is extremely premature to initiate this process 13 years before the first license extensions end in 2032 and 2033.

SPS-21-1a

SPS-21-2

Furthermore, we note with alarm that documents exist that appear to show the NRC granted Dominion requests for relief and exemptions prior to Dominion submitting their application for subsequent license renewal. This seems to demonstrate a deeply problematic and potentially inappropriately close relationship between regulators and industry. With this in mind we are further concerned at the number and frequency of postponed inspections, tests and examinations that did not meet 100% coverage. At the least these tests need to be fully completed and all of the results made publicly available prior to any further review.

SPS-21-1b

APV believes further steps must first be taken before any relicensing at Surry NPP proceeds. There is NO need to rush forward, instead the public needs a full accounting based on good science and free of industry bias.



## 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

*An Agency of the Natural Resources Secretariat*

[www.nrc.virginia.gov](http://www.nrc.virginia.gov)

Telephone (757) 247-2200 (757) 247-2292 V/TDD Information and Emergency Hotline 1-800-541-4646 V/TDD

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.

SPS-22-1

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.

SPS-22-2

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](mailto:randy.owen@mrc.virginia.gov). Thank you for the opportunity to comment.

Sincerely,



Randal D. Owen  
Deputy Chief, Habitat Management

RDO/lrp  
HM



## COMMONWEALTH of VIRGINIA

### DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219

Mailing address: P.O. Box 1105, Richmond, Virginia 23218

[www.deq.virginia.gov](http://www.deq.virginia.gov)

Matthew J. Strickler  
Secretary of Natural Resources

David K. Paylor  
Director

December 20, 2018

(804) 698-4000  
1-800-592-5482

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, DC 20426

RE: Surry Power Station, Unit Nos. 1 and 2 Relicensing  
Docket ID NRC-2018-0280  
Surry, Virginia

Dear Secretary Bose:

This letter is in response to the scoping request for the above-referenced project.

As you may know, the Department of Environmental Quality, through its Office of Environmental Impact Review (DEQ-OEIR), is responsible for coordinating Virginia's review of federal environmental documents prepared pursuant to the National Environmental Policy Act (NEPA) and responding to appropriate federal officials on behalf of the Commonwealth. Similarly, DEQ-OEIR coordinates Virginia's review of federal consistency documents prepared pursuant to the Coastal Zone Management Act which applies to all federal activities which are reasonably likely to affect any land or water use or natural resources of Virginia's designated coastal resources management area must be consistent with the enforceable policies Virginia Coastal Zone Management (CZM) Program.

#### DOCUMENT SUBMISSIONS

In order to ensure an effective coordinated review of the NEPA document and federal consistency documentation, notification of the NEPA document and federal consistency documentation should be sent directly to OEIR. We request that you submit one electronic to [eir@deq.virginia.gov](mailto:eir@deq.virginia.gov) (25 MB maximum) or make the documents available for download at a website, file transfer protocol (ftp) site or the VITA LFT file share system (Requires an "invitation" for access. An invitation request should be sent to [eir@deq.virginia.gov](mailto:eir@deq.virginia.gov)). We request that the review of these two documents be done concurrently, if possible.

The NEPA document and the federal consistency documentation (if applicable) should include U.S. Geological Survey topographic maps as part of their information. We strongly encourage you to issue shape files with the NEPA document. In addition, project details should be adequately described for the benefit of the reviewers.

SPS-23-1

## ENVIRONMENTAL REVIEW UNDER THE NATIONAL ENVIRONMENTAL POLICY ACT: PROJECT SCOPING AND AGENCY INVOLVEMENT

As you may know, NEPA (PL 91-190, 1969) and its implementing regulations (Title 40, *Code of Federal Regulations*, Parts 1500-1508) requires a draft and final Environmental Impact Statement (EIS) for federal activities or undertakings that are federally licensed or federally funded which will or may give rise to significant impacts upon the human environment. An EIS carries more stringent public participation requirements than an Environmental Assessment (EA) and provides more time and detail for comments and public decision-making. The possibility that an EIS may be required for the proposed project should not be overlooked in your planning for this project. Accordingly, we refer to "NEPA document" in the remainder of this letter.

While this Office does not participate in scoping efforts beyond the advice given herein, other agencies are free to provide scoping comments concerning the preparation of the NEPA document. Accordingly, we are providing notice of your scoping request to several state agencies and those localities and Planning District Commissions, including but not limited to:

- Department of Environmental Quality:
  - o DEQ Regional Office\*
  - o Air Division\*
  - o Office of Wetlands and Stream Protection\*
  - o Office of Local Government Programs\*
  - o Division of Land Protection and Revitalization
  - o Office of Stormwater Management\*
- Department of Conservation and Recreation
- Department of Health\*
- Department of Agriculture and Consumer Services
- Department of Game and Inland Fisheries\*
- Virginia Marine Resources Commission\*
- Department of Historic Resources
- Department of Mines, Minerals, and Energy
- Department of Forestry
- Department of Transportation

Note: The agencies noted with a star (\*) administer one or more of the enforceable policies of the Virginia CZM Program.

## FEDERAL CONSISTENCY UNDER THE COASTAL ZONE MANAGEMENT ACT

Pursuant to the federal Coastal Zone Management Act of 1972, as amended, and its implementing regulations in Title 15, *Code of Federal Regulations*, Part 930, federal activities, including permits, licenses, and federally funded projects, located in Virginia's Coastal Management Zone or those that can have reasonably foreseeable effects on Virginia's coastal uses or coastal resources must be conducted in a manner which is consistent, to the maximum extent practicable, with the Virginia CZM Program.

Additional information on the Virginia's review for federal consistency documents can be found online at  
<http://www.deq.virginia.gov/Programs/EnvironmentalImpactReview/FederalConsistencyReviews.aspx>

SPS-23-2

## DATA BASE ASSISTANCE

Below is a list of databases that may assist you in the preparation of a NEPA document:

- DEQ Online Database: Virginia Environmental Geographic Information Systems

Information on Permitted Solid Waste Management Facilities, Impaired Waters, Petroleum Releases, Registered Petroleum Facilities, Permitted Discharge (Virginia Pollution Discharge Elimination System Permits) Facilities, Resource Conservation and Recovery Act (RCRA) Sites, Water Monitoring Stations, National Wetlands Inventory:

- [www.deq.virginia.gov/ConnectWithDEQ/VEGIS.aspx](http://www.deq.virginia.gov/ConnectWithDEQ/VEGIS.aspx)

- DEQ Virginia Coastal Geospatial and Educational Mapping System (GEMS)

Virginia's coastal resource data and maps; coastal laws and policies; facts on coastal resource values; and direct links to collaborating agencies responsible for current data:

- <http://128.172.160.131/gems2/>

- MARCO Mid-Atlantic Ocean Data Portal

The Mid-Atlantic Ocean Data Portal is a publicly available online toolkit and resource center that consolidates available data and enables users to visualize and analyze ocean resources and human use information such as fishing grounds, recreational areas, shipping lanes, habitat areas, and energy sites, among others.

<http://portal.midatlanticocean.org/visualize/#x=-73.24&y=38.93&z=7&logo=true&controls=true&basemap=Ocean&tab=data&legends=false&layers=true>

- DHR Data Sharing System

Survey records in the DHR inventory:

- [www.dhr.virginia.gov/archives/data\\_sharing\\_sys.htm](http://www.dhr.virginia.gov/archives/data_sharing_sys.htm)

- DCR Natural Heritage Search

Produces lists of resources that occur in specific counties, watersheds or physiographic regions:

- [www.dcr.virginia.gov/natural\\_heritage/dbsearchtool.shtml](http://www.dcr.virginia.gov/natural_heritage/dbsearchtool.shtml)

- DGIF Fish and Wildlife Information Service

Information about Virginia's Wildlife resources:

- <http://vafwis.org/fwis/>

- Total Maximum Daily Loads Approved Reports

- <https://www.deq.virginia.gov/programs/water/waterqualityinformationtmdls/tmdl/tmdldeveloment/approvedtmdlreports.aspx>

Publicly  
available  
information or  
references.



- Virginia Outdoors Foundation: Identify VOF-protected land
  - <http://vof.maps.arcgis.com/home/index.html>
- Environmental Protection Agency (EPA) Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) Database: Superfund Information Systems

Information on hazardous waste sites, potentially hazardous waste sites and remedial activities across the nation, including sites that are on the National Priorities List (NPL) or being considered for the NPL:

- [www.epa.gov/superfund/sites/cersites/index.htm](http://www.epa.gov/superfund/sites/cersites/index.htm)

- EPA RCRAInfo Search

Information on hazardous waste facilities:

- [www.epa.gov/enviro/facts/rcrainfo/search.html](http://www.epa.gov/enviro/facts/rcrainfo/search.html)

- EPA Envirofacts Database

EPA Environmental Information, including EPA-Regulated Facilities and Toxics Release Inventory Reports:

- [www.epa.gov/enviro/index.html](http://www.epa.gov/enviro/index.html)

- EPA NEPAassist Database

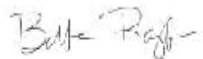
Facilitates the environmental review process and project planning:

<http://nepaassisttool.epa.gov/nepaassist/entry.aspx>

If you have questions about the environmental review process and/or the federal consistency review process, please feel free to contact me (telephone (804) 698-4204 or e-mail [bettina.rayfield@deq.virginia.gov](mailto:bettina.rayfield@deq.virginia.gov)).

I hope this information is helpful to you.

Sincerely,



Bettina Rayfield, Program Manager  
Environmental Impact Review and  
Long-Range Priorities

**Subject:** FW: Surry Relicensing, Scoping Comments: NRC-2018-0280 (ESSLog# 38468)  
**Date:** Thursday, February 14, 2019 11:50:35 AM

SUNSI Review Complete  
Template = ADM-013  
E-RIDS=ADM-03  
ADD=Eric Oesterle, Tam Tran, Barbara Hayes

**From:** Ewing, Amy <amy.ewing@dgif.virginia.gov>  
**Sent:** Thursday, February 14, 2019 11:38 AM  
**To:** Castellon, Krupskaya <Krupskaya.Castellon@nrc.gov>  
**Subject:** [External\_Sender] Surry Relicensing, Scoping Comments: NRC-2018-0280 (ESSLog# 38468)

COMMENT (11)  
PUBLICATION DATE: 12/20/2018  
CITATION 83 FR 65367

I apologize if these comments are late. I hope they are still useful.

We have reviewed the information available for the subject project, relicensing of Surry Power Station (SPS) Units 1 and 2, located at Surry Power Station in Surry County, adjacent to Hog Island Wildlife Management Area, owned and managed by the Virginia Department of Game and Inland Fisheries. We note that the applicant, Dominion Energy, reached out to us for information about wildlife resources under our jurisdiction that are known from the project area, and have, therefore, been provided this same information as has the Virginia Department of Environmental Quality's Office of Environmental Impact Review.

Since SPS was licensed and began operation, Atlantic sturgeon, in addition to other wildlife native to VA, have been federally listed as an Endangered Species. Therefore, the James River has been designated a Threatened and Endangered Species Water due to presence of Atlantic sturgeon. These fish are known from the river year-round, and to engage in both spring and fall migration and spawning in this reach of the river. These fish also are known to congregate in the James River from Hog Island downstream. In addition, this stretch of the James River, and Lawnes Creek, have been designated Anadromous Fish Use Areas because of the presence of alewife herring, blueback herring, American shad, striped bass, yellow perch, and hickory shad. The applicant stated in their coastal consistency determination that with relicensing and continued operation of SPS, "aquatic organisms would continue to be impinged and entrained at the intake structure, but these impacts were determined to be SMALL." To protect resident aquatic species including federally Endangered Atlantic sturgeon and other anadromous fishes from impingement and entrainment, we recommend that the applicant consider redesign/retrofitting of the cooling water intake on the James River to take advantage of currently best technology available (BTA). In addition, we are concerned about potential impacts of cooling water discharge upon Atlantic sturgeon. Furthermore, we understand that it is necessary for the applicant to periodically dredge the canal that diverts water from the James River to the cooling water intake, an activity which also may impact sturgeon. We note that NRC may engage in consultation with the U.S. Fish and Wildlife Service to address potential impacts of this project on Atlantic sturgeon, and that USFWS has expressed interest in our input to that process. We gladly would participate in such discussions, and believe such consultation may offer the best path toward determination of appropriate measures, if any, that are needed to ensure continued protection of Atlantic sturgeon and other resident aquatic species. Such measures could include intake screen mesh or design, intake velocity restrictions, or time-of-year restrictions on certain dredging or instream construction activities. Though we would anticipate mutual agreement among the agencies regarding any measures that may be appropriate, until such issues are resolved, we cannot determine the likely impacts of relicensing and continued operations on these fishery resources. We also recommend that NOAA Fisheries Service be included in these discussions, as a cognizant federal agency.

SPS-24-1

Regarding other fish and wildlife resources under our jurisdiction, we offer the following additional comments:



(1) We recommend coordination with the USFWS regarding potential impacts upon federally Threatened northern long-eared bats associated with any tree removal associated with upland development on site.

(2) We document state Endangered peregrine falcons from the project area. Based on the information we currently have, we do not believe this project is likely to result in adverse impacts upon peregrine falcons. However, we recommend the applicant consider this species as one that may be encountered onsite, especially as they could be impacted by future site development.

(3) We document bald eagle nests, roosts, and the James River Bald Eagle Concentration Zone from the project area. Significant habitat alteration, location of water-dependent facilities within concentration zones and/or near nests, or other recreational and commercial activities may result in adverse impacts upon eagles. Therefore, we recommend that the applicant ensure that this project is consistent with state and federal guidelines for protection of bald eagles; and that they coordinate as appropriate with the U.S. Fish and Wildlife Service regarding possible impacts upon bald eagles or the need for a federal bald eagle incidental take permit. We recommend referencing the Center for Conservation Biology's [Eagle Nest Locator](#) to determine if any recently active nests are on site.

(4) We document colonial waterbird colonies from the project area. To best protect these resource associated with upland development at SPS, we recommend that any colonies located on site be mapped and that an undisturbed, naturally vegetated buffer of 500ft be maintained around each colony. We recommend that any significant construction activities within 0.25 mile of any colony adhere to a time-of-year restriction from February 15 through June 15 of any year.

(5) This project is located within 2 miles of a documented occurrence of a state or federal threatened or endangered plant or insect species and/or other Natural Heritage coordination species. Therefore, we recommend coordination with VDCR-DNH regarding the protection of these resources.

SPS-24-2

Thank you for this opportunity to review this project; we look forward to resolving these issues through consultation with the appropriate federal and state agencies, as is indicated in the applicant's request for our input.

Thanks,  
Amy

**Amy Ewing**

*Environmental Services Biologist  
Manager, Fish and Wildlife Information Services*

P 804.367.2211

**Virginia Department of Game & Inland Fisheries**

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