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 James

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# PUBLIC SUBMISSION

COMMENT (8)  
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**Docket:** NRC-2018-0101  
 Turkey Point Nuclear Plant Units 3 and 4

**Comment On:** NRC-2018-0101-0034  
 Florida Power & Light Company; Turkey Point Nuclear Generating Unit Nos. 3 and 4

**Document:** NRC-2018-0101-DRAFT-0041  
 Comment on FR Doc # 2019-06612

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## Submitter Information

**Name:** Albert Gomez  
**Address:**  
 Miami, FL, 33133  
**Email:** albert@icassemblies.com

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## General Comment

My name is Albert Gomez, I am a resident of the City of Miami, live within the 50 mile evacuation radius of Turkey Point and am a former City of Miami Sea Level Rise Committee Member. I am a founding member of the Miami Climate Alliance and a current steering committee member of the Biscayne Bay Marine Health Summit, a convening event supported by both Miami-Dade County board of commissioners and the City of Miami Commission focused on advancing policies, research, and best practices that advance Biscayne Bay Health.

Primary comment: the NRC should enable more time for individuals to share research and data related to Turkey Point.

There are evolving environmental issues at Turkey point. The public should be allowed to submit new information not weighted within the current SEIS. The May 20th deadline does not give sufficient time for this information, research and media to be shared with the NRC given the file upload constraints.

With more time, the NRC and associated regulatory agencies can review new information on:

- 1- New fresh water well contaminations that occurred since the SEIS was completed
- 2- New dead zones just east of Turkey Point in Biscayne Bay National Park
- 3- Scientific pier reviewed research on massive sea grass die offs with nutrient signatures related to Turkey Point just east of Turkey Point and the associated cooling canals

- 4- Documented illegal salt dumping south of Turkey Point which has created contaminated ground water, more dead zones and is in violation of environmental regulations
- 5- Negatively cascading water quality within the cooling canals
- 6- Radioactive high salinity pollution plumes continuing to advance and seep from cooling canals into our water supply in violation of several federal, state and county regulations with no validated clean up methodology to recapture the increasing polluted water
- 7- Ongoing and concurrent consent decrees between the EPA, FL DEP, DERM and Miami-Dade county within Miami-Dade County mandating the county improve water quality, which is below standard and behind the stated schedule for clean up and nutrient reduction. Turkey Point is negatively impacting water quality and nutrient load through the ongoing operation of Turkey Point Reactor 3 & 4 and associated polluting cooling canals, and in so will further delay adherence to the consent decree and associated guidelines
- 8- FPL and the NRC have not applied the Process for Ongoing Assessment of Natural Hazard Information (POANHI) within the SEIS and if so considered, it has not been accurately applied given the inaccurate modeling standards within the sea level rise projections, compounded storm surge modeling and potential rain event totals and in so are not accurately addressing the actual threats and vulnerabilities Turkey Point is currently exposed to today.
- 9- FPL operates within Miami-Dade County and has currently entered into a clean up agreement with DERM over the increasing and advancing radioactive high salinity pollution plume. This clean up agreement has not been fulfilled or validated, in fact varying scientific institutions have reviewed FPL's pollution plume clean up methodology and have concluded that it will fail to clean up the pollution plume, therefore advancing more pollution through continued operation of Turkey Point Reactor 3 & 4 will place FPL in breach of the clean up agreement. Re-licensing Turkey Point ahead of the clean up would usurp DERM's authority to regulate and protect our clean drinking water supply.
- 10- I have video showcasing the ultra green, high turbidity cooling canals. The video was taken after the FPL fresh water recharge events within the cooling canals. The poor condition of the water quality showcases that the water recharge methodology is not a permanent solution. Furthermore the recharging simply pushes down the hyper saline plume via ionization transfer and pressure into our water supply further contaminating our ground water and advancing the radioactive hyper saline pollution plume.
- 11- Since Miami-Dade county is within a Consent Decree with the EPA, FL DEP and DERM, the NRC should allow DERM and related agencies to weigh in on the NRC's decision to re-license Turkey Point Reactor 3 & 4. Right now, DERM and related agencies are not considered in the SEIS review process. Also, the NRC is currently adjusting the environmental review framework for ground water standards. The NRC should not re-license while relevant frameworks are in flux.
- 12- Miami-Dade County is currently within the SE FL Climate Change Regional Compact. Compliance with compact affects financial bond ratings. FPL is currently utilizing lower sea level rise models than what has been agreed to within the compact based on "conservatism". This is fundamentally at odds with the counties operating principals.

All the above assertions can be supported with factual research and media. Please allow more time for supportive facts to be shared. Videos available.