From: bonnie rippingille <rippdinger@aol.com>
Sent: Monday, May 20, 2019 5:24 PM
To: TurkeyPoint34SLREIS Resource
Cc: Drucker, David
Subject: [External_Sender] FPL SLRA Docket ID NRC-2018-0101, ORCA EIS Comments
Attachments: winmail.dat; ATT00001.htm; NRC EIS OR ltr-FPL SLRA Docket ID NRC-2018-0101.pdf; ATT00002.htm

Dear Mr. Drucker:

We are sending this email and letter below with our comments on the 2019 draft EIS for the FPL TPP again to the correct email address. Please confirm receipt by email if you can to me.

Bonnie Rippingille, Esq.
Ocean Reef Community Association

Begin forwarded message:

From: Katherine Jackson <kjackson@orcareef.com>
Subject: RE: FPL SLRA Docket ID NRC-2018-0101
Date: May 20, 2019 at 4:46:07 PM EDT
To: "'TurkeyPoint34SLREIS.Reesource@nrc.gov'" <TurkeyPoint34SLREIS.Reesource@nrc.gov>
Cc: "'david.drucker@nrc.gov'" <david.drucker@nrc.gov>, "'Bonnie Rippingille-Schoedinger (rippdinger@aol.com)'" <rippdinger@aol.com>, "'Steve Schoedinger (schoedingerconsulting@aol.com)'" <schoedingerconsulting@aol.com>

Good Afternoon,

Attached please find a letter in reference to FPL SLRA Docket ID NRC-2018-0101.

Best,

Katherine Jackson
Administrative Specialist
Ocean Reef Community Association
Office: 305-367-7324
Email: kjackson@orcareef.com
[cid:image001.png@01D50F29.5C3B8CE0]

Federal Register Notice: 84FR13322
Comment Number: 4980

Mail Envelope Properties (9773265B-D3BB-471F-A6FF-78674B65B7FE)

Subject: [External_Sender] FPL SLRA Docket ID NRC-2018-0101, ORCA EIS Comments
Sent Date: 5/20/2019 5:24:10 PM
Received Date: 5/20/2019 5:24:18 PM
From: bonnie rippingille

Created By: rippdinger@aol.com

Recipients:

Post Office: aol.com

Files	**Size**	**Date & Time**
MESSAGE	1426	5/20/2019 5:24:18 PM
winmail.dat	259674	
ATT00001.htm	914	
NRC EIS OR ltr-FPL SLRA Docket ID NRC-2018-0101.pdf	219154	
ATT00002.htm	853	

Options
Priority: Standard
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Ocean Reef Community Association

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May 20, 2019

David Drucker
Senior Project Manager
Nuclear Regulatory Commission

RE: FPL SLRA Docket ID NRC-2018-0101

Dear Mr. Drucker:

Ocean Reef is located approximately 5.5 miles from the TPPP plant and we have more than 2,000 Ocean Reef members/residents that are affected by the operation of the TPPP.

FPL is applying to the NRC for a 20-year extension to their nuclear plant operating licensing from 2032 to 2052. This will make it amongst the oldest nuclear power plants in the world and the first in the US to operate for 80 years if the SLRA is granted. The reactors were designed for 40 years of use and the license has already been extended to 60 years. FPL is now asking for another 20-year license extension, for a total of 80 years of operation.

Management problems with aging plants include: irradiated structural steel reactor pressure vessel supports, concrete containment pre-stressed tendons and buried and underground piping, which are all current issues at TPPP. According to the May 9th letter we received from the NRC, a Safety Evaluation Report on these three review topics will be left open for resolution and closed sometime in June 2019, with an update final report issued. We are requesting a copy of this report.

We hope that you are not engaging in reducing standards on the maintenance and operations of this plant and will not fail to enforce the current regulations. Accommodations significantly undermine safety — and plant aging moves the reactors closer to an accident that could harm the public, jeopardize the future of nuclear power in the United States and/or destroy our community in Ocean Reef and South Florida. We have read articles about nuclear plant issues where when valves leaked, more leakage was allowed — up to 20 times the original limit. When rampant cracking caused radioactive leaks from steam generator tubing, an easier test of the tubes was devised, so plants could meet standards. Failed cables, busted seals, broken nozzles, clogged screens, cracked concrete, dented containers, corroded metals and rusty underground pipes — all of these and thousands of other problems are linked to aging plants, and were uncovered in the Associated Press year long investigation. All of these could escalate dangers in the event of an accident and we do not want this to happen here.

The TP plant was designed in the 60s with a unique cooling system of approximately 10 square miles of open, unlined cooling canals which use water to cool the reactors. The TPP site and cooling canal system are adjacent to the surficial Biscayne Aquifer, our designated sole source drinking water aquifer and situated between the Everglades National Park, the designated Outstanding Federal Waters of the US, the Biscayne National Park and Card Sound. The open cooling canal system (CCS) was an experiment and is an antiquated system that has not worked as designed for approximately 30 years. The unlined

cooling canals are licensed by the State of Florida as an industrial wastewater site. The hyper saline plume created by the FPL operation of the cooling canal system was caused by the 40 mgd of evaporation of water from the open canals which left millions of gallons of heavier salt behind in the bottom of the canals. The hot polluted hyper saline water (3 times saltier than seawater) in the cooling canals has caused the sea grass to die in the canals, which leaving a polluted mix of nutrients and decaying organic matter in the CCS that has interfered with the ability of the water to cool the reactors during periods of intense heat. Now, the system cannot be operated safely without the infusion of 30 million gallons of brackish water daily from our secondary aquifer, the Floridan, to freshen and dilute the salt concentration in the CCS. The CCS water is still hypersaline although the level of salinity has been reduced.

Over the course of approximately 35 years, starting in about 1982; FPL has tried five times to resolve the issues caused by the cooling canals, but none of these proposed solutions have worked. At the present time, FPL is attempting a 6th fix which is a line of 10 extraction wells, along the western side of the 5 mile length of the canal system, to attempt to pull back the polluted hyper saline water *after it leaks into the aquifer* and to *stop and pull back the hyper saline plume which extends out more than 4 miles in all directions from the cooling canals. The hypersaline plume is still moving towards Monroe County water well field to the West of the TPPP.* Now into the second year of operation , there is no evidence that the hyper saline plume has been stopped. Recently, FKAA scientist Kirk Martin provided us with monitoring well reports demonstrating that the hyper saline plume is still moving westward.

The renewal of the FPL TPPP NRC license according to the NRC environmental impact statement (EIS) is also premised on the agreement with Miami Dade WASD to build a RO reclaimed water plant for the purpose of providing FPL with the massive amounts of water required to operate the cooling canal system safely and effectively. In the interim, FPL has been permitted by the SFWMD to withdraw this water from the L31 canal and the brackish water of the Floridan, of which supply is limited because it is recharged by rainfall and artesian wells from Northern Florida and Georgia. This use of the Floridan in large quantities for this purpose adversely affects taxpayer funded Everglades Restoration projects in the area by diverting our limited water supply to the cooling canal system. If FPL is allowed to continue to use the cooling canal system, the reclaimed RO water produced by the plant will continue to leak from the canals and into the aquifer and bay. DERM and WASD are requiring the cleaning of the reclaimed water to non-degradation standards to avoid further impairment of the bay. This water quality standard and the 40mgd a day that evaporates yearly from the canals make this an extremely costly process. FDEP has recognized southern Biscayne Bay is already impaired on their official list of impaired water bodies, which is why DERM is requiring the non-degradation standard. Because of the cost of cleaning the wastewater to non degradation standards, there has been no agreement to date reached between FPL and WASD for the RO reclaimed water plant. We believe that approval of the proposed permit and the application for license renewal would be premature until the RO reclaimed water plant issues are resolved between Miami Dade County/DERM and FPL.

FPL is also seeking a new NPDES permit from the Florida Department of Environmental Protection which will allow FPL to continue discharging polluted hyper saline water from the (CCS)into the Biscayne Aquifer, our primary source of drinking water, and into the bay through the groundwater and porous limestone under the aquifer. FPL is not allowed to discharge into the navigable waters of the United States either directly or indirectly under its current FDEP pollution permit and FPL has been discharging for 35 years in violation of this permit. We understand that they will be required to have this permit as a condition of granting the SLRA and have asked that it be deferred or not issued until the extent of the damage caused by the operation of the CCS to the bay is assessed.

What happens if this 6th fix fails and FPL devises a new plan for the 7th time which has all they have been required to do by the regulatory authorities for the last 35 years. Our aquifer and our drinking water supply as well as our bay continues at risk. The last time FPL had a live pollution permit was in 2005 and it was not extended because FPL have not provided a solution that works to date. Although the existing permit and the Clean Water Act prohibits discharging any "pollutants" directly and indirectly into a "water of the United States," the cooling canals have been leaking into the aquifer and the bay for decades, which is why FPL was cited by DERM and FDEP with violations several years ago. Why would the FDEP issue the new permit before FPL demonstrates that the current plan is successful? Under the Florida

Administrative Code back sliding is not permitted where there have been violations by the holder of the NPDES permit so the issuance of a less restrictive permit under these circumstances violates FDEP's own rules and is subject to legal challenge. If the FPL proposed changes to this permit are approved without the cooling towers, it appears that the current polluted water leakage from the groundwater/ cooling canals into the aquifer, bay and Card Sound will continue.

The CCS at TPPP, which lies almost at sea level along the bay, is also at risk of being toppled during storm surges and hurricanes. Rising seas due to changing climate conditions also threaten the cooling canal system going forward. Serious safety concerns are presented by these issues.

For all of these reasons, we are asking that NRC require FPL to upgrade the TPPP by requiring one of the recognized new alternative options be installed, all of which include mechanical draft cooling towers, which have been recognized as the best available cooling technology for nuclear reactors for many years, and that FDEP require FPL to cease operations of the cooling canals because of the ongoing pollution to the bay and our sole source aquifer unless the remediation required in the Consent Decree is successful in the next four years.

We have also requested that the Governor and FDEP defer the issuance of the FDEP NPDES permit until the issues we have raised are resolved and we are currently engaging in meetings with FDEP on the draft permit.

Thank you for your consideration.

Sincerely,

Gary List, Chairman
Ocean Reef Community Association