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T. C. NICHOLS, JR.  
VICE PRESIDENT AND GROUP EXECUTIVE  
NUCLEAR OPERATIONS

DISTRIBUTION SERVICES  
SECTION

November 12, 1980

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: Virgil C. Summer Nuclear Station  
Docket No. 50/395

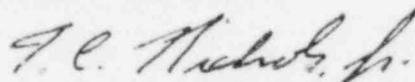
Dear Mr. Denton:

South Carolina Electric and Gas Company, acting for itself and as agent for South Carolina Public Service Authority, provides forty-five (45) copies of comments related to the Draft Environmental Statement for the Virgil C. Summer Nuclear Station.

These comments are being furnished by Dr. D. A. Rayner to further support comments made in our letter of August 17, 1979, to Mr. Don E. Gells.

If you have any questions, please let us know.

Very truly yours,



T. C. Nichols, Jr.

TCN:gm

cc: V. C. Summer  
G. H. Fischer  
T. C. Nichols, Jr.  
E. H. Crews, Jr.  
O. S. Bradham  
O. W. Dixon, Jr.  
R. B. Clary  
W. A. Williams, Jr.  
B. A. Bursey  
J. B. Knotts  
B. Kane  
D. A. Nauman  
NPCF/Whitaker  
File

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*South Carolina  
Wildlife & Marine  
Resources Department*

James A. Timmerman, Jr., Ph.D.  
Executive Director  
Jefferson C. Fuller, Jr.  
Director of  
Wildlife and Freshwater Fisheries

October 21, 1980

Mark B. Whitaker, Jr.  
Group Manager  
Nuclear Engineering and Licensing  
S.C.E. & G. Company  
P. O. Box 764  
Columbia, SC 29218

Re: NUREG-0534, Draft Environmental Statement by the U.S. Nuclear Regulatory Commission Office of Nuclear Reactor Regulation related to operation of Virgil C. Summer Nuclear Station proposed by S.C.E. and G. Company Docket No. 50-395

I have the following comments concerning section 2.5.1.1 Plants. I have examined the S.C. Heritage Program's site records for endangered and threatened plants, and none are found in close proximity to the transmission corridors associated with this project. The S.C.E. & G. Company has map overlays indicating the locations of all of our species of concern and has utilized them in this project. However, our records only represent where botanists have sampled and do not reflect all the occurrences of endangered, threatened, or otherwise rare plants within the project area.

Only two plants presently are listed as Federally endangered in South Carolina, Trillium persistens and Sagittaria fasciculata. Neither of these plants is likely to occur in the project area.

Many of the species listed in Table 2.8 also are not likely to occur in the project area. I recently completed a survey of granite outcrops in South Carolina; none were found within the transmission corridors of this project. Thus, Draba aprica, Amphianthus pusillus, Arenaria uniflora, Sedum pusillum, Quercus georgiana, Isoetes melanospora, and Panicum lithophilum need no longer be considered as possibly occurring in the project area.

Hymenocallis coronaria is found only in rocky shoals in the piedmont, usually near the fall line.

Sarracenia jonesii is found only in the mountains of South Carolina.

Ribes echinellum is known from a single site in McCormick County. Its habitat is quite specialized (steep north bluffs) and is not likely within the project area.

Panax quinquefolius and Platanthera flava are not considered

species of national concern by the S.C. Heritage Program.

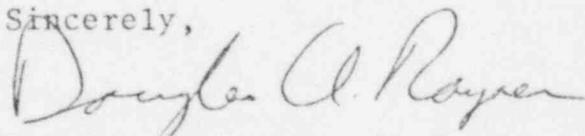
The following species may be within the project area: Rhus michauxii, Ptilimnium nodosum, Echinacea laevigata, Helianthus sch-einitzii, Quercus oglethorpensis, Myriophyllum laxum, Sporobolus teretifolius, Lysimachia asperulaefolia, Waldsteinia lobata, and Nestronia umbellula. Since the transmission corridors were cleared several years ago, any potential negative impact from those operations has already occurred. The only activities that could negatively affect any endangered species that occur in the transmission corridor are maintenance related. And, of the routine maintenance procedures used by the S.C.E. & G. Company, application of herbicides is the only procedure likely to impact any endangered species. If the transmission corridors were to be maintained without using herbicides, I would see no real need for a survey to determine if any endangered or threatened species are present. S.C.E. & G. Company officials might argue that it is not economically feasible to maintain transmission corridors using mowing procedures only, but Duke Power Company maintains that it is actually cheaper to mow rather than apply herbicides.

It is noted on page 2-17 that there is no Federal mandate requiring that species proposed for listing be treated as if they were listed. However, most, if not all, Federal agencies do consider proposed species in their planning activities as if they were listed. This is done to avoid any future conflicts with a proposed species that is later listed.

The S.C.E. & G. Company has the following options: (1) do a complete floristic survey of transmission corridors in question; (2) change maintenance procedures from mowing and herbicide application to mowing only or; (3) do nothing--don't treat proposed species as if they were listed.

Since the transmission corridors have already been cleared, I would recommend option (2). I trust that, as a public spirited organization, the S.C.E. & G. Company will give this option serious consideration.

Sincerely,



Douglas A. Rayner, Ph.D.  
Botanist  
S.C. Heritage Program

DAR/mlld

cc: Malcolm Leaphart  
Frank Hill  
Labruce Alexander  
Dr. Richard Porcher  
Bob Gale