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Docket Nos. 50-338

50-339

Mr. Bernard C. Rusche, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. B. J. Youngblood, Chief
Environmental Projects Branch 2
Division of Site Safety and
Environmental Analysis

Dear Mr. Rusche:

North Anna-Gordonsville
230 kV Transmission Line

Attached as Enclosures 1 and 2 are answers to the questions transmitted by your letter of August 20, 1976.

Some additional information is also included.

Enclosure 3 is a copy of a report prepared for Vepco by Enviro Audits entitled The Management of Transmission Line Rights of Way, July, 1976.

Enclosure 4 is a copy of page 64 of the 1975 Virginia Weed Control Guide, Control Series 1, published by the Extension Division, Virginia Polytechnic Institute and State University.

Enclosure 5 is a booklet published by the Dow Chemical Company entitled A Closer Look At The Pesticide Question For Those Who Want The Facts.

Please let us know if more information is needed for your review.

Very truly yours,

W. L. Proffitt

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Enclosures

bc: Messrs. L. D. Johnson, III
E. A. Baum
Wadsworth Bugg, Jr.
R. R. Brooks
M. W. Maupin

THIS COPY FOR

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ANSWERS TO
QUESTIONS CONCERNING THE NORTH ANNA-GORDONSVILLE
TRANSMISSION LINE ADDITION

Q 1. Describe any alternatives to the use of herbicides and the reason for rejection of the alternatives. Who will apply the herbicides? Are they licensed and State approved? How often will herbicides be applied? What measures for control of run-off will be used?

Ans. There are several alternatives to the use of herbicides, none of which have been rejected by Vepco. The primary alternatives are machine mowing and hand cutting. Vepco maintains 36,000 acres of brush with a balanced program consisting of all three methods based on economic and environmental criteria. Historically on a system wide basis herbicide treatment has been less expensive than machine mowing or hand cutting. In 1975 however, bids for machine mowing were slightly cheaper than ground spraying. Consequently during 1975, approximately 1,800 acres received herbicide treatment, 7,800 acres were machine mowed and 6,000 acres were hand cut. The lower prices for machine mowing are largely the result of previous herbicide treatments which reduce brush density and composition, thereby reducing the amount of work necessary in a cutting or mowing operation. Rights-of-way that have not received a herbicide treatment cost approximately three times as much to maintain by cutting. Actual costs in 1975 were \$40 per acre for herbicide ground application and \$38 per acre for machine mowing, but for areas without previous herbicide treatment machine mowing was \$100 to \$125 per acre. Other factors such as terrain, access and land use are important in determining the type of maintenance treatment. Herbicides are an important and environmentally acceptable tool for managing brush along with other methods.

Herbicides are applied by Vepco contractors, some with twenty years experience in chemical brush control. These herbicides, applied to Vepco specifications, are registered with the U.S. Environmental Protection Agency and Virginia Department of Agriculture. They are applied in accordance with label instructions and according to recommendations of the Agricultural Extension Service of Virginia Polytechnic Institute and State University. Commercial applicators will be required by Virginia state law to be licensed and certified beginning October, 1977. In order to be certified, personnel will be required to complete written tests and demonstrate proficiency in the field of woody brush control.

It is proposed in areas where herbicides are used, to alternate herbicide applications and cutting applications. Generally speaking, herbicides would be applied two times in a ten year period. The rates of application will not exceed eight pounds an acre during any application.

The herbicide applications proposed by Vepco are known as foliar applications. This type application wets the leaves of target broad leaf plants. The foliar application requires less herbicide per acre than a stem or trunk application. The foliar spray is applied in

amounts not to exceed fifty gallons of mixture per acre. Direct run-off from this application has not been observed during Vepco spraying or from research conducted by the U. S. Forest Service. Vepco specifications and label instructions prohibit the spraying of lakes, streams, ponds, and ditch banks.

Q 2. What is the alternative to burning of right-of-way debris? Describe the considerations which lead to the choice of the methods which will be used.

Ans. The principal alternative to burning would be to pile debris at the edge of the right-of-way. Other alternatives are chipping or hauling away. Whole tree chipping is extremely expensive because of the massive special machinery required. Hauling is not practicable because disposal sites are not available.

Vepco prefers to dispose of unmerchantable debris on rolling and fiat terrain by burning. This leaves a considerable area open for pasture land, crop land, or game food plots, eliminating an unsightly condition with logs and limbs lying on the right-of-way. The open area also helps to reduce maintenance costs for machine mowing or mobile chemical applications. Vepco has found that property owners prefer a clean right-of-way free of limbs and logs, and wish to avoid the resulting problems associated with this debris, such as possible fire danger, increased amount of insects, and reduced usable land. All burning operations are conducted in accordance with local and state air pollution laws. A public hearing is required in certain areas prior to any authorization to burn on the right-of-way. Since 1972 six public hearings have been held on Vepco proposals to burn right-of-way debris and no opposition has been received.

Q 3. Will it be necessary to relocate residences with either proposed or alternative routes?

Ans. No

Q 4. Are there areas along the proposed or alternate routes with particular aesthetic impacts? (e.g., observation towers, residential areas or parks).

Ans. No

Q 5. Will the use of the railroad right-of-way interfere with communication?

Ans. No

Q 6. Are there alternate types of transmission line towers available (e.g., wood, low profile)? What considerations lead to the choice of the proposed towers?

Ans. Alternate types of transmission structures given consideration were: wood and concrete "H" frames and single pole concrete. Single pole steel structures are being used for the line at the request of the Louisa County Board of Supervisors. The steel poles are more expensive than any of the three alternate type structures but were considered to be more aesthetically acceptable.

Q 7. Are underground lines feasible for all or part of the route? **193**

Ans. Underground lines were not considered because of the following factors: (1) the area is predominantly rural with a low residential density, (2) excessive cost of underground lines and (3) no critical environmental areas which warrant underground lines.

Q 8. Are there any current objections by any Federal, State or local agency or individual to all or part of the line? What is the response from notified agencies (e.g., county supervisors)?

Ans. The following State agencies were notified and written replies stating no objection have been received:

- (1) Virginia Commission of Historic Landmarks
- (2) Virginia Commission of Outdoor Recreation
- (3) Virginia Department of Highways and Transportation
 - (a) Utilities Section
 - (b) Environmental Control Section
- (4) Virginia Department of Conservation and Economic Development

The county supervisors made several suggestions which have been incorporated into the proposed route. Alternates B and D were rejected at the suggestions of the Louisa County officials. The proposed route does not conflict with the county's comprehensive plan.

The proposed facility was publicly advertised as required by the State Corporation Commission of Virginia and no objections or comments were received. The State Corporation Commission issued a certificate of convenience and necessity for the facility after considering the need and the environmental effects.

We do not know of any current objections to any part or all of the line.

Q 9. Are there State or Federal endangered or threatened species in the area?

Ans. There are no known official State classifications of endangered or threatened species in any category. No mammals, fish, reptiles, or amphibians officially listed as endangered or threatened, or under consideration by the Federal government for these lists, are known to occur in or near the area of the proposed transmission line route or alternate routes.

Q 10. What is the extent of loss of agricultural productivity from the proposed and alternate rights-of-way?

Attached as Enclosure 2 is a chart showing the Land use acreage for the proposed route and the 4 alternate routes. The total acres are for the entire route comprising the appropriate segments for the alternates.

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Q 11. Describe any historical, cultural, and archeological sites or natural landmarks which are located within one mile of proposed or alternate routes.

The Virginia Commission of Historic Landmarks has reviewed the the proposed line route and approved its location. They have eight surveyed residential locations within one mile of the proposed and alternate routes. None of the eight sites have been recommended for registration with the National Historic Landmarks Register. Two of the residences are unoccupied. No significant architectural features were indicated for any of the sites.

The Virginia Research Center for Archaeology has reviewed the line for possible archeological sites. They report that there are no known archeological sites in the vicinity of the proposed or alternate transmission routes.

LAND USE ACREAGE

NORTH ANNA-LOUISA 230KV LINE

	PROPOSED	ALTERNATE A	ALTERNATE B	ALTERNATE C	ALTERNATE D
Wooded Lands	136.0	157.0	125.0	160.0	125.0
Cultivated Lands	0.6	0.6	0.6	0.0	0.6
Pasture Lands	0.7	0.7	0.7	0.7	0.7
*Open Lands	0.3	0.0	4.7	2.6	2.0
Totals	137.6	158.3	130.0	163.3	128.3

*As shown on Quadrangle maps

FAS
8/30/76