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Georgia Power

*the southern electric system*

D. O. Foster  
Vice President and Project  
General Manager  
Vogtle Project

February 8, 1985

Director of Nuclear Reactor Regulation  
Attention: Ms. Elinor G. Adensam, Chief  
Licensing Branch #4  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

File: X8BE03  
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NRC DOCKET NUMBERS 50-424 AND 50-425  
CONSTRUCTION PERMIT NUMBERS CPPR-108 AND CPPR-109  
VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 AND 2  
RESPONSE TO COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Denton:

Attachment I is Georgia Power Company's response to the comments of Federal and State agencies and other interested parties on the Draft Environmental Impact Statement related to the operation of Vogtle Electric Generating Plant, Units 1 and 2 forwarded by Elinor G. Adensam's letter of January 30, 1985. The attached responses are organized according to the individual comments received.

Attachment II is a report by Dr. Morton I. Goldman of NUS Corporation on VEGP cooling tower drift. This document replaces earlier estimates provided by Georgia Power Company which bounded the expected cooling tower drift estimate at 0.7 to 17 pounds/acre/year onsite and 8 to 15 pounds/acre/year offsite. This document provides a definitive description of cooling tower drift from the VEGP cooling towers and calculates the site-specific drift deposition patterns, a realistic maximum estimate of about 0.1 pounds/acre/year and a conservative maximum estimate of less than 2 pounds/acre/year, both onsite and offsite. This document further substantiates our position that a drift deposition monitoring program is not needed as we stated in the general comments on the DEIS contained in my letter of January 4, 1985.

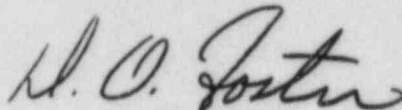
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Director of Nuclear Reactor Regulation  
February 8, 1985  
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If you have any questions concerning the attached comments please contact us.

Yours very truly,



D. O. Foster

DOF/DHW/sro  
Attachments  
wbdfrnc

cc: M. A. Miller  
R. A. Thomas  
J. A. Bailey  
L. T. Gucwa  
G. F. Trowbridge, Esquire  
G. Bockhold, Jr.  
J. E. Joiner  
L. Fowler  
C. A. Stangler

Response to Comments on Vogtle Draft Environmental Statement forwarded by  
Elinor G. Adensam's letter of January 30, 1985

Educational Campaign for a Prosperous Georgia Letter Dated January 4, 1985

Page 9, paragraph 5:

The City of Augusta, Georgia has proposed to construct a 12 MW hydroelectric facility on the existing canal which parallels the Savannah River in the vicinity of Augusta. This hydroelectric facility will only divert a portion of the river flow through the turbines and return it to the river. This activity will be above the existing navigation lock and dam which controls water levels in the vicinity of Augusta. This proposal will have no impact on water levels or flows in the vicinity of VEGP.

Page 16, paragraph 2:

Cumulative impacts of Vogtle and the SRP including the proposed operation of the L-Reactor were addressed by the Department of Energy in the L-Reactor Final Environmental Impact Statement Section 5.2.

Page 16, paragraph 3:

The DES provides a description of the applicant's pre-operational radiological monitoring program. The operational radiological monitoring program will be specified in the Radiological Effluent Technical Specifications.

Page 16, paragraph 4:

The DES has addressed the impacts of transmission lines on Ebenezer Creek, endangered species, and health and safety of the public (Sections 4.2.7, 4.3.4, 4.3.5, 5.6, 5.2.2, and 5.5.1.2).

Page 16, paragraph 5:

Modification of the multiport discharge structure was prompted by the U.S. Corps of Engineers' review of the design (D.G. Eisenhut's letter to D. Dutton of January 29, 1982). Georgia Power Company proposed and was granted a modification of the original multiport design that would substitute a single-port design. This design (a) met COE criteria for maintaining navigation; (b) represented an environmental improvement over the original design in that it reduced the potential of maintenance and operational problems due to biofouling by Asiatic clams which are present in the Savannah River; and (c) most importantly, resulted in a plant discharge having a smaller predicted chemical and thermal plume than predicted for the original design.

Page 16, paragraph 7:

As shown in the DES, doses due to liquid effluents during the operation of Vogtle would be less than the Appendix I design objectives. The L-Reactor FEIS (Section 5.2), prepared by the Department of Energy, addresses the cumulative effects of SRP and VEGP.

Page 16, paragraph 8:

As noted in the response to NRC staff question E290.11 (OL-ER page QE290.11-1), persistent trillium, hairy rattleweed and the green pitcher plant are not known to occur in any county within the State of Georgia occupied by the VEGP or its associated transmission lines. D. O. Foster's letter to E. G. Adensam (September 14, 1984) addressed the occurrence of the woodstork, bald eagle and red-cockaded woodpecker at the VEGP site and along the associated transmission lines. Neither the woodstork nor the bald eagle nests within 10 to 15 miles from the site or transmission lines. Surveys for the red-cockaded woodpecker (also see Applicant's general comments on the DES, D. O. Foster's letter to H. R. Denton, January 4, 1985) identified no suitable habitat or colonies. In the geographic range of the eastern indigo snake, (a threatened species) no evidence of the eastern indigo snake was found during surveys of the transmission line rights-of-way (See D. O. Foster's letter to H. R. Denton, January 4, 1985). The Bachman's Warbler is probably extinct and was not observed during the surveys. The Florida panther is known to occur only in southern Florida. The American alligator has been sighted at VEGP in the two sediment retention basins and Mallard's Pond. If anything, the construction of the sediment basins has increased suitable habitat for the alligator. Construction and operation of VEGP has not and will not adversely impact Mallard's Pond or any other alligator habitat and does not pose a threat to the species. The biological assessment of the potential impact of the VEGP on the shortnose sturgeon is presented in DES Section 5.6.2 and is complete, accurate and considers a range of conditions. The DES has been reviewed by the applicable federal and state regulatory agencies responsible for protecting and managing threatened and endangered species. No comments have been submitted indicating that VEGP and its associated transmission facilities will have a significant adverse impact on any threatened or endangered species.

Page 17, paragraph 1:

Potential fogging or other weather impacts due to the cooling towers were addressed in the Construction Permit - FES. As noted in Georgia Power Company's comments on the DES (D. O. Foster's letter of January 4, 1985), heavy fogging in the area occurs a very small percentage of the time.

Page 17, paragraph 5:

Potential impacts on the plant of dam failure of dams up-river from the plant are addressed in the FSAR Section 2.4.

Page 17, paragraph 6:

The DES appropriately notes that evaluations concerning the impact of transmission lines on historical and cultural resources are being conducted in conjunction with the State Historical Preservation Officer. Specific information concerning Francis Plantation is being developed for the State Historical Preservation Officer's review. Following that review, this information will be provided to the NRC. This is in accordance with the requirements of 36 CFR 800.

Educational Campaign for a Prosperous Georgia Letter Dated January 7, 1985

Responses to William Lawless' comments are included herein. Responses to Judith E. Gordon's comments were provided by D. O. Foster's letter of January 30, 1985.

U. S. Environmental Protection Agency Letter Dated January 10, 1985

Wetlands:

Georgia Power Company has committed to following the best management practices and complying with the conditions for performance of activities associated with the VEGP transmission lines in wetlands pursuant to the requirements of 30 CFR 330. In addition to meeting these best management practices and conditions, any permanent sloughs and water channels will be crossed by bridging or open bottom type culverts adequately sized to accommodate the natural flow. As noted in the DES Section 5.2.2, the existing logging road is being used for access to the tower location at Station 124.00. Also, as noted in the DES, any maintenance activities within the Ebenezer Creek Swamp National Natural Landmark will be conducted by hand cutting.

Water Quality, page 2, item 1:

It should be noted that there are two startup ponds, one to be utilized for chemical cleaning wastes and the other one to be utilized for other washes or flushes as necessary. These wastes are distinguished consistent with EPA's comment; i.e. chemical metal cleaning waste are those resulting from cleanings using chemicals such as acids, alkaline phosphate solution, etc.

Water Quality, page 2, item 2:

The response to NRC staff question E291.21 describes the dechlorination system which would be used during the time of continuous chlorination for the control of Asiatic clams.

Noise, paragraph 2:

EPA's comment relative to mitigation measures for the off-site residents in proximity to the transmission line is based on information contained in the DES. Information provided in our comments (D. O. Foster's letter of January 4, 1985) demonstrate that the information in the DES should be modified and that a mitigation program should not be considered.

William Lawless' Letter Dated January 11, 1985

Page 1, paragraph 1:

The DES is not the appropriate vehicle for describing in detail the monitoring devices or methods utilized for gaseous and liquid effluents. The NPDES permit specifies sampling frequencies, techniques, and analysis methods to be used in determining compliance with the NPDES permit for non-radioactive effluents. The Radiological Effluent Technical Specifications will provide details of monitoring for liquid and gaseous radioactive effluents.

Page 13, item 10:

The effluent release to the Savannah River will be within the pH criteria (6.0 - 9.0) specified in the NPDES permit.

Page 17, paragraph 1:

Cumulative effects of the SRP and VEGP are addressed in the L-Reactor FEIS Section 5.2.

Page 17, paragraph 2:

Appendix B to the DES provides concentrations of airborne releases from the VEGP.

U. S. Department of Interior Letter Dated January 22, 1985

Paragraph 2:

The discrepancy between the average ground water use rate was corrected in the Applicant's comments on the DES (D. O. Foster's letter to E. G. Adensam, January 4, 1985).

Paragraph 3:

The potential for reversal of the hydraulic gradient in the Tuscaloosa Aquifer caused by ground water withdrawals at Plant Vogtle is highly improbable. A small percentage of the total ground water capacity of the Tuscaloosa Aquifer is currently being extracted. Plant Vogtle will not significantly alter the demand on the aquifer. The capacity of the Tuscaloosa Aquifer in the Plant Vogtle area is discussed in Section 2.4.13.1.3.1 of the Vogtle FSAR.

Presently, within a radius of 30 miles of the plant site, the major extractions are at the Savannah River plant and in the city of Augusta, with each area extracting less than 5000 gpm. A study by McCollom, M. J. and Counts, H. B., 1964, in USGS Water Supply Paper 1613-D, of the capability and yield of the Tuscaloosa Aquifer in the coastal plain has estimated the safe yield to be 5 billion gallons per day. It is generally accepted that the Tuscaloosa Aquifer

is full and ground water is discharging to the Savannah River. Therefore, it is evident that the ground water extractions from the Tuscaloosa Aquifer may be increased several fold without exceeding the estimated safe yield. Therefore, the possibility of any reversal of the hydraulic gradient caused by ground water withdrawals at Plant Vogtle is highly improbable.

Paragraph 4:

Water levels in the confined aquifer will be monitored at regular intervals as part of plant operation. At this time nine observation wells are used to monitor ground water conditions in the confined aquifer.