

SURRY POWER STATION LICENSE RENEWAL COMMENTS
TO THE U.S. NUCLEAR REGULATORY COMMISSION
MAY 29, 2002

GOOD AFTERNOON,

THANK YOU FOR THE OPPORTUNITY TO ADDRESS YOU TODAY IN SUPPORT OF THE SURRY POWER STATION'S LICENSE RENEWAL. MY NAME IS LAVERNE DANIELS AND I AM SUPERINTENDENT OF SURRY COUNTY PUBLIC SCHOOLS.

DURING MY FOUR-YEAR TENURE HERE, WHEN THE TOPIC OF LICENSE RENEWAL HAS COME UP I'VE OFTEN ASKED CITIZENS, "WHAT WOULD IT BE LIKE IF THE POWER PLANT WERE NOT HERE?" THEY ALWAYS SHAKE THEIR HEADS AND SAY, "YOU DON'T WANT TO KNOW AND WE DON'T EVEN WANT TO THINK ABOUT IT. WE DON'T WANT TO GO BACK TO THE WAY WE WERE BEFORE THE POWER PLANT WAS BUILT."

TO PREPARE MY COMMENTS FOR YOU TODAY I ASKED MY OFFICE STAFF TO RESPOND TO THE TOPIC "WHAT THE DOMINION POWER PLANT IN SURRY MEANS TO ME." THREE MAJOR THEMES EMERGED FROM THEIR

COMMENTS: COUNTY REVENUE, HOUSEHOLD INCOME, AND CORPORATE CITIZENSHIP.

THE SIGNIFICANT AMOUNT OF MONEY IN PROPERTY TAXES PAID BY DOMINION PROVIDE A GREAT SOURCE OF ASSURANCE THAT THE COUNTY WILL BE ABLE TO MEET THE NEEDS OF THE COMMUNITY.

OUR SCHOOLS HAVE BEEN REVITALIZED BECAUSE OF OUR NUMBER ONE SOURCE OF TAX REVENUE -- THE POWER PLANT. WE NOW HAVE MODERN, UP-TO-DATE SCHOOLS OF WHICH EVERYONE CAN BE PROUD. BECAUSE OF THE POWER PLANT OUR CHILDREN HAVE THE LEARNING ENVIRONMENT THEY DESERVE.

THE POWER STATION PROVIDES EMPLOYMENT OPPORTUNITIES, THEREBY GIVING HOUSEHOLD INCOME TO MANY RESIDENTS OF THE COUNTY WHO, IN TURN, CONTRIBUTE TO THE LOCAL ECONOMY.

THE POWER STATION'S LOCAL INVOLVEMENT IS AN EXAMPLE OF THEIR GOOD CORPORATE CITIZENSHIP. MANY COUNTY ORGANIZATIONS

AND CHARITIES HAVE RECEIVED MONETARY SUPPORT FROM THE POWER STATION AND VOLUNTEER SUPPORT FROM PLANT EMPLOYEES. MY STAFF AND I RECENTLY WORKED WITH DOMINION'S CORPORATE SERVICES STAFF AND RECEIVED A GENEROUS CHECK TO PURCHASE A MATH/SCIENCE COMPUTER LAB AND TO PURCHASE ADDITIONAL COMPUTERS FOR THE SCIENCE DEPARTMENT AT OUR HIGH SCHOOL. WE ARE NOW WORKING TOWARD GETTING SOME OF OUR STUDENTS INTO THE NUCLEAR OPERATORS TRAINING PROGRAM. THE POWER STATION IS AN OUTSTANDING EDUCATIONAL PARTNER.

WE KNOW THAT THE POWER PLANT HAS AN EXCELLENT SAFETY RECORD. THEREFORE, THE CITIZENS AREN'T WORRIED ABOUT THE EFFECTS OF **HAVING** THE NUCLEAR POWER PLANT; THEY'RE WORRIED ABOUT THE EFFECTS OF **NOT HAVING** THE NUCLEAR POWER PLANT.

M. LaVerne Daniels, Ph.D.
Superintendent
Surry County Public Schools

Toby Sowers
Director, Operations and Maintenance-Surry Power Station
NRC Public Meeting
Surry Power Station License renewal
May 29, 2002

Good evening. My name is Toby Sowers – the Director of Operations and Maintenance at Surry Power Station. I would like to thank the Nuclear Regulatory Commission for holding this important meeting to receive public comment on the NRC's Supplemental Environmental Impact Statement related to Dominion's license renewal application for Surry Power Station. I'm honored to represent the Station, as I believe that we at Dominion, Surry County and other local communities all have a stake in the future of Surry Power Station.

As an employee of Dominion, I am excited about license renewal. A renewed license is not only important for Surry County and Virginia, but also for more than 850 other fulltime Surry employees whose livelihood depends on providing safe and reliable electricity to customers in this state – not to mention future employees that will be required to continue safe operation of the station well into this century. Surry Power Station generates about 15 percent of the power used in Virginia and has done so for the past 30 years. A renewed license will provide assurance that the local economy will continue to reap the benefit of having a large employer in the area and that Surry County will continue to receive tax revenue from the Station's operations.

I'd like to take a moment to tell you a little about myself, and my association with Surry Power Station. My background is fairly typical of many of the members of our site leadership team. I began my career in 1967 with a 6-year enlistment in the US Navy as a nuclear submarine operator. I later worked for Stone & Webster Engineering as an associate engineer, providing design and operational engineering support to several operating nuclear plants, including Surry. I completed my degree in Engineering and obtained my Professional Engineer license in the state of Virginia, while working for Stone and Webster. I moved to Surry in 1978 as a construction engineer for Stone and Webster and joined Dominion in 1983 as the site design engineering supervisor. I obtained my commercial senior reactor operator certification during my tenure as site engineering manager. In 1999 I became Director of Station Safety and Licensing, and 2000, was promoted to Plant Manager.

Surry has a long history of safe and efficient operation. We're consistently ranked among the most efficient producers of nuclear-generated electricity in the United States. The station also has achieved high levels of performance in nuclear safety and plant security as measured by the Nuclear Regulatory Commission.

The Nuclear Regulator Commission – in its Systematic Assessment of Licensee Performance during the period spanning 1992-1998 gave the Station high marks for safety, with an average score of 1.2, which is defined as having superior safety performance in all station functional areas. Under the NRC's revised oversight process, Surry continues to fully meet all NRC safety cornerstone objectives. The Institute of Nuclear Power Operations, also, has consistently given Surry high marks for nuclear safety and operational performance in addition to fully accrediting all of our training programs.

Our commitment to environmental stewardship dates back to the construction days of 1960s and 1970s. We believe our proximity to the Hog Island wildlife preserve fits hand-in-glove with efforts to maintain operations that have a minimal impact on the local environment. We feel blessed to have bald eagles and ospreys nesting and soaring over our property. We treasure the beauty of the pelicans, egrets and herons that perch on the banks of our intake and discharge canals. As you approach the plant entrance you'll see our Station Goals posted on roadside signs. One of those goals is to have no environmental violations (a repeat of the successful 2001 goal).

We don't put oil or other contaminants into the ground or waterways. If we have a piece of equipment leak oil we have a spill prevention and cleanup procedure we invoke and we document the leak in our Corrective Action System where we track what, how, and why it happened and what we will do to prevent reoccurrence.

One of the things that we took a look at when we considered whether to apply to renew Surry's license was the cost of replacing the plant. Surry generates more than 1,600 megawatts of electricity, or enough power to light up about 400,000 homes. The station was relatively inexpensive to build, costing about \$400 million. When you consider the cost of building new baseload electric generating units in today's economy, that's a bargain. In the future, more electricity, not less, will be required to meet growing customer demand. Because of Surry's low production costs, overall safety performance and minimal impact on the environment, we believe that re-licensing the station is the best option for meeting the future electricity needs of Virginians.

Finally, I would like to thank those of you from the State and Local governments on behalf of Dominion for allowing us to do business in Surry County. We strive to be a good corporate citizen and have enjoyed the

professional, supportive working relationship we have with the State and Local officials. Dominion has a long-standing tradition of investing in the communities we serve through volunteer and philanthropic activities. Our employees demonstrate their commitment to their community by participating in Adopt-a-Highway programs, Holiday baskets for the needy, contributing to the United Way, Blood Drives, supporting area scouting programs and many other community activities. We consider community partnership as an important component of the Dominion equation and environmental stewardship as a core component of that partnership.

I appreciate the opportunity to talk about our license renewal plan and would now like to introduce Dr. Jud White, our Manager of Environmental Policy and Compliance, to talk about the environmental specifics of our operations.

Thank you.

Comments by Jud White, Dominion
NRC Public Comment Meeting – May 29, 2002
Draft Supplemental Environmental Impact Statement (SEIS)
Surry Power Station

- My name is Jud White and I'm an environmental manager for Dominion with responsibilities related to water and waste compliance activities at all of our generating facilities, including Surry Power Station. I have about 27 years experience with Dominion; my academic degrees include a Masters in Biology and a Ph.D. in Environmental Policy. I am very proud of Dominion's environmental performance throughout the years I've been employed.
- I was directly involved with the Dominion nuclear team that prepared the license renewal application for Surry Power Station and, in particular, I helped develop our environmental report to the NRC and coordinated with federal and state environmental agencies.
- Dominion commends the NRC in developing a high-quality and professional draft Supplemental Environmental Impact Statement associated with license renewal for Surry Power Station. The Supplemental Environmental Impact Statement is a thorough and accurate scientific assessment of the potential environmental impacts associated with the proposed action.
- Dominion supports and agrees with the conclusion of NRC staff that renewing the Surry Power Station operating license is a reasonable option that will not result in any noticeable impact to the environment. The draft Supplemental Environmental Impact Statement states, "the adverse environmental impacts of license renewal for Surry Power Station, Units 1 and 2, are not so great that preserving the option of license renewal for energy-planning decisionmakers would be unreasonable." Basically this means that for Dominion the license renewal option is preserved or acceptable for Surry Power Station in order to meet future system generating needs of the company.

- The environmental impacts associated with potential alternative sources of electricity, in lieu of license renewal, are considered greater than preserving the option of license renewal for Surry Power Station. This is an important finding in the draft Supplemental Environmental Impact Statement.
- Dominion prepared (over a several year period) and submitted an extensive Environmental Report to NRC for license renewal that was part of the information used by NRC to develop this Supplemental Environmental Impact Statement and its recommendation. In other words, the NRC didn't just rely on our work. They independently validated our conclusions through the use of additional resources, including; their Generic Environmental Impact Statement for License Renewal for Nuclear Plants, extensive consultation with federal, state, and local environmental agencies, independent review by NRC staff and national laboratory consultants, and the consideration of public comment during the scoping process last September.
- Of particular note relative to information sources, Dominion proactively engaged in discussions and meetings with key state and federal environmental agency staffs very early in the license renewal process to help ensure all issues were identified and appropriately addressed in the Environmental Report submitted to the NRC. Dominion also proactively communicated with environmental and other pertinent stakeholders about license renewal. This helped considerably in the development of a thorough and accurate report.
- Potential environmental impacts to fish, shellfish, aquatic macroinvertebrates and threatened and endangered species are discussed in detail in the report. In fact extensive studies of the environmental impacts began in 1969, before the station was operational. Based on the station's cooling water intake and discharge design (water intake screening results in high survivability, heated water is dispersed and cools rapidly) and its location in the tidal transition zone (biota more abundant upstream and downstream of the plant site), the NRC concluded that potential impacts to aquatic biota from operation are small and that additional mitigation is not warranted. The NRC has also preliminarily determined that the continued operation of Surry Power Station and its associated transmission lines will not adversely affect any threatened or endangered species, including the bald eagle, which has

thrived in the area for many years. Dominion agrees with these scientific findings of NRC.

- With respect to historic resources, Dominion has coordinated closely with Virginia's Department of Historic Resources during the license renewal process. This department has concluded that "there are no recorded historic districts, structures or archaeological sites located within the ... facility." The staff concluded though that there is a moderate to high potential for undiscovered historical and archaeological resources to be present on the undeveloped portions of the property; but by limiting future access to the property, it was determined that continued operation of the Surry Power Station would have a beneficial, protective effect on undiscovered historical or archaeological resources located in the undisturbed portion of the site, for the duration of the license renewal period.
- To assist NRC in evaluating the current applicability of the Generic Environmental Impact Statement information as it pertained to the generic issues classified as needing no further review, Dominion developed an internal procedure to identify any new and significant information related to these issues that could potentially change the determinations. No information was identified that would change the conclusions in the Generic Environmental Impact Statement. This activity is considered very important in all license renewal projects for verification of the findings in the Generic Environmental Impact Statement.
- Dominion also agrees with the NRC that the potential environmental impacts of license renewal for the remaining environmental issues evaluated separately in the Supplemental Environmental Impact Statement are small. A significant consideration for this determination was the fact that no new major construction or land-disturbing activity is to take place in order to proceed with license renewal, nor are there any new or increased environmental emissions as a result of this action. In essence, current measures to mitigate environmental impacts associated with operations were found to be adequate.
- Dominion takes pride in its environmental performance and its positive relationships with regulatory agencies, environmental organizations, the general public, and our community neighbors. All of this takes time to

foster and develop as well as a major commitment by management to openness and candor. In this license renewal process we want to ensure that we continue on this path and that nothing adversely impacts our future performance or relationships.

- Dominion believes that our obligation to provide safe and reliable energy from nuclear power extends well beyond this license renewal milestone. Federal, state and local oversight will continue to test and challenge, just as it does today, our standard of environmental excellence and the conduct of our daily business.
- Dominion welcomes all comments on the contents of this Supplemental Environmental Impact Statement during the required public comment period and we look forward to working constructively with NRC staff.