

Table A-3. SNC's Comments and Staff Responses

No. ^(a)	Page ^(b)	Line Nos.	Comment	SNC's Proposed Resolution	Disposition
I04	1-9	Table 1-1, 7 to 16	Some permits include "state" in the requirement column description. To clarify that the permits are state and not federal, SNC recommends adding the word "state" to the items described. Also add the identified words for clarification.	Requirement Column: <u>State</u> air quality <u>State drinking</u> water quality <u>State</u> storm water discharge State <u>NPDES</u> discharge permit <u>State</u> solid waste landfill	Clarified as suggested
I05	2-4	Figure 2-3	HNP revised permit and added two wells for irrigation of ornamental plants after ER was written. This change in the application was communicated to the staff by letter dated December 15, 2000.	See the revised Figure 2-3 attached which identifies the location of wells 4 and 5.	Updated number of wells; replaced figure
I06	2-11	32 and 34	SNC recommends clarification of description of mixed waste and hazardous waste.	HNP also provides for <u>accumulation and</u> temporary onsite storage of mixed wastes, which contain both radioactive and chemically hazardous waste. Storage of radioactive material is regulated by the NRC under the Atomic Energy Act of 1954 (AEA), and <u>accumulation and temporary</u> storage of hazardous wastes is regulated by the U.S. Environmental Protection Agency (EPA) under the Resource Conservation and Recovery Act of 1976 (RCRA).	Clarified as suggested
I07	2-12	1	A copy of the ODCM is only included if the ODCM was revised during the year.	Includes the ODCM as an appendix <u>if it is revised during the year covered by the report</u> (Southern Company 2000a).	Corrected to reflect actual practice
I08	2-14	1	From review of preceding text and review of plant drawings, the off-gas recombiner building should be included in this description.	The major system components are located in the turbine building, <u>off-gas recombiner building</u> , and in the waste gas treatment building.	Clarified as suggested

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109	2-14	34 to 36	Per our review of HNP FSAR and year 2000 49 CFR, it appears that 171 through 185 would apply to HNP.	Solid waste is packaged in containers to meet the U.S. Department of Transportation requirements in 49 CFR Parts 171 through 177-185 . Disposal and transportation are performed in accordance with the applicable requirements of 10 CFR Part 61, and Part 71, and 49 CFR Parts 171 –185 respectively.	Reference changed to 49 CFR Parts 171 to 180; Parts 181 to 185 are not used
110	2-15	1	Please add text to clarify that number is for disposed waste.	From year to year, the volume of radioactive contaminated waste generated will vary. The average value of <u>disposed waste</u> at HNP over the past 5 years is about 320 m ³ (11,300 ft ³).	Clarified as suggested
111	2-20	6	Permit has been revised since application to allow a change in monthly average. This change in the application was communicated to the staff by letter dated December 15, 2000.	SNC is permitted (Georgia Department of Natural Resources [GADNR] Permit 001-0690-01) to withdraw a monthly average of up to 273,000 m³/d (72 million gpd) <u>322,292 m³/d (85 million gpd)</u> with a maximum 24-hour rate of up to 392,000 m ³ /d (104 million gpd). As a condition of this permit, SNC is required to monitor and report withdrawals.	Revised to reflect change, with the metric number rounded to 323,000 m ³ /d

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I12	2-20	31	HNP revised permit and added two wells for irrigation of ornamental plants after ER was written. This change in the application was communicated to the staff by letter dated December 15, 2000.	Although the current permit indicates four <u>six</u> onsite wells, there are actually only three wells providing groundwater for domestic and process use. <u>Wells four and five provide water for irrigation of ornamental vegetation.</u> The fourth <u>sixth</u> well was intended to provide makeup water for a wildlife habitat pond that was not completed; therefore, the well has not been installed.	Corrected
I13	2-21	4	HNP revised permit and added two wells for irrigation of ornamental plants after ER was written. This change in the application was communicated to the staff by letter dated December 15, 2000.	Change "three" to "five"	Updated
I14	2-21	37	SEIS states that HNP is located in western Georgia. Various other references to HNP location state south central Georgia.	Change "western" to "south-central".	Corrected
I15	2-28	15	Drinking water samples are not included in the REMP	Shoreline sediment and water samples from the Altamaha River, and drinking water samples .	Corrected

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116	2-28	30	For clarification between ODCM results and REMP make the following changes.	<p>Southern Company reported the following estimated whole body doses to the most limiting member of the public for 1999:</p> <ul style="list-style-type: none"> • approximately 0.00064 mSv/yr (0.064 mrem/yr) based on vegetation, fish, and sediment results from the HNP environmental monitoring program (Southern Company 2000b). • approximately 0.00074 mSv/yr (0.074 mrem/yr) based on gaseous and liquid effluent releases (Southern Company 2000a). <p><u>For 1999, dose estimates were also calculated based on radioactivity detected in the environment and attributed to plant operations as part of the REMP.</u></p> <p><u>Southern Company reported the following potential whole body doses to the most limiting member of the public for 1999:</u></p> <ul style="list-style-type: none"> • <u>approximately 0.00046mSv/yr (0.046 mrem/yr) based on vegetation, 0.00013 mSv (0.013 mrem/yr) based on fish, and 0.000049 mSv/yr (0.0049 mrem/yr) based on sediment (Southern Company 2000b).</u> 	Clarified and corrected as suggested

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117	2-33	21	States that the US 1 widening project is expected to be "undertaken" within 5 years. However, the reference document states that this project is anticipated to "begin" within 5 years. "Undertaken" implies that it will be completed in that time frame.	Change the wording "expected" to "anticipated" and "undertaken" to "begin".	Clarified as suggested
118	2-38	21	In Table 2-13 the last number in the 30-40 Miles column is incorrect.	Change this number from 82,270 to 87,270.	Corrected as suggested
119	2-42	24	The text refers to one "historical site" known to exist on the HNP site, the Bell Cemetery. While the phrase "historical site" is not defined, its use within the section entitled "Historic and Archaeological Resources at HNP" can suggest an unintended meaning. This is because related regulations define "site" as a location of a significant event, activity, or structure [36 CFR 60.3(l)] and "historic property" as something included in, or eligible for inclusion in, the National Register [36 CFR 800.2(e)]. NRC does not seem to suggest that the Bell Cemetery has historical significance and, in fact, cemeteries or even graves of historical figures ordinarily are not considered eligible for inclusion in the National Register (36 CFR 60.4). As communicated in SNC letter, dated August 11, 2000, Plant Hatch is required by "Georgia Power's Human Remains Policy" to protect any known or discovered cemeteries or burial grounds whether it is a historical site or not.	Only one unrecorded historical site is known to exist on the HNP. This is the Bell Cemetery is indicated...	Slight modification to wording
120	4-26	25	See comment for Page 2-42, Line 24	Delete the word "historic"	"Historic" removed

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121	4-26	32 to 35	<p>The text seems to suggest that SNC would have to perform a formal study to determine the likelihood of cultural resources being present before, for example, logging. A requirement for performing cultural resource evaluations has not been required of previous license renewal applicants. For HNP and the previous plants, NRC indicated that studies in the area found cultural resources and NRC imposed on the applicants only the standard of care. There is no apparent basis for treating HNP differently and the discussion on an evaluation should be deleted.</p>	<p>Such activities may include not only operation of the plant itself but also land management-related actions such as ground disturbance. Since the plant site has not been subjected to an intensive cultural resources field survey to identify and record all cultural resources, and landscape modification or ground disturbance of previously undisturbed areas should be preceded by a cultural resource evaluation to fulfill obligations under the National Historic Preservation Act of 1966 and implementing regulations.</p>	<p>Text modified to better reflect how the potential for future disturbance should be managed</p>

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I22	4-31	16, 18	HNP revised permit and added two wells for irrigation of ornamental plants after ER was written. This change in the application was communicated to the staff by letter dated December 15, 2000.	Change "yield" to "use" Add to end of paragraph: Two smaller wells for irrigation of ornamental vegetation were placed in service in early 2000. Those wells typically draw 9000 GPD each and are used as needed.	Clarified as suggested
I23	4-32	10	HNP revised permit and added two wells for irrigation of ornamental plants after ER was written. This change in the application was communicated to the staff by letter dated December 15, 2000.	Add to end of paragraph: Irrigation wells four and five are also located in the Floridan Aquifer. A sixth well has been permitted in the Miocene Aquifer but has not been constructed.	Additional information included as suggested
I24	4-34	33	Clarify text to edit description of shortnose sturgeon. As written the text could imply differences from other shortnose sturgeon	Thus, an additional 20 years of operation of HNP should not affect the viability of the Altamaha River shortnose sturgeon or result in any population decline.	Wording clarified

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125	4-34	35	<p>Section 7(2) of the Endangered Species Act reads as follows: "Each Federal agency shall, in consultation with and with the assistance of the Secretary {of Interior}, insure that any action authorized, funded, or carried out by such agency...is not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or modification of habitat of such species...which is determined..to be critical, unless such agency has been granted an exemption for such action. In fulfilling the requirements of this paragraph each agency shall use the best scientific and commercial data available." Both the NRC and SNC biological assessments for the shortnose sturgeon are based on the "best scientific and commercial data available" and indicate that the impact would be small. The conclusion at the end implies that this is potentially an open item. SNC recommends that preliminary be deleted.</p>	<p>Based on the <u>results of the NRC</u> biological assessment, it is the staff's preliminary conclusion that the impact to the shortnose sturgeon is SMALL and that mitigation is not needed.</p>	<p>The staff agrees and has clarified this position</p>

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I26	6-2	16 to 20	Table 6-1 appears to contain an incomplete listing of GEIS Sections.	Add Section 6.6 to the GEIS Sections column in Table 6-1.	References added
I27	8-3	34	There are currently no known or identified Historic and Archaeological resources on the Plant Hatch site. Text implies that there are currently "known" resources and implies that the Visitors Center is one of them. These resources should be included in the socioeconomic paragraph and not under a heading titled "Historic and Archaeological Resources. SNC also recommends revising conclusion as stated in the General Comments section.	<p><u>Historic and Archaeological Resources:</u> The potential for future adverse impacts to known or unrecorded cultural-historic and archaeological resources at the HNP <u>site</u> following decommissioning will depend on the future use of the site land. Known resources and activities include the current Visitors Center and associated interpretative efforts that are funded and maintained by SNC. Eventual sale or transfer of the land within the plant site could result in adverse impacts on these resources should the land-use pattern change dramatically.</p>	Slight changes in wording to clarify

(a) Comment numbers I01 through I03 are from SNC's letter (p.A-124) to which this table was attached.

(b) Page numbers refer to pages in the draft SEIS.