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Southwest Florida Water Management District

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July 2, 2008

Mike Halpin, Director
Florida Department of Environmental Protection
Siting Coordination Office
2600 Blair Stone Road MS-48
Tallahassee, Florida 32399-2400

Re: Site Certification Application No. PA08-51/DOAH Case No. 08-2727
Progress Energy Florida – Levy County Nuclear Power Plant

Dear Mr. Halpin:

The Southwest Florida Water Management District staff has completed its initial review of the above-referenced application for site certification in accordance with Section 403.5066 of the Florida Electrical Power Plant Siting Act. District staff has determined that the application is not complete at this time.

Attached is a list of additional information items requested by District staff in order to make the application complete for review.

If you have any questions concerning the enclosed, you may contact me at the District's Brooksville headquarters at extension 4660. You may also contact Paul Williams, Water Use Manager, at the District's Brooksville Regulation Department if you require more detailed discussion concerning the proposed consumptive water use.

Sincerely,

Martha A. Moore
Senior Attorney

Enclosure

cc: R. Owen B. Lue P. Williams L. Bartos R. Jaques
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Attached service list

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SOUTHWEST FLORIDA WATER MANAGEMENT DISTRICT
COMPLETENESS COMMENTS
Progress Energy Florida – Levy County Nuclear Power Plant
Site Certification Application No. PA08-51
DOAH Case No. 08-2727
July 2, 2008

I. WATER RESOURCE AND CONSUMPTIVE USE ISSUES

Hydrologic Analysis

Drawdown Impact Modeling was submitted by the Applicant in support of the above referenced site certification application. The ground-water flow model MODFLOW was used to evaluate drawdown impacts from the proposed withdrawals. In order to evaluate the modeling the MODFLOW input and output data files will be needed. If a model preprocessor was used, such as Visual Modflow or Groundwater Vistas, the files created by those programs should also be submitted. In addition, an analysis of the cumulative impacts of all withdrawals within the model should be performed.

1. In order to assess the hydrologic impacts associated with proposed water use from all sources, the applicant must perform analyses that demonstrate the extent of the water-level drawdown in the surficial and Floridan aquifers, showing related lake level and spring flow impacts (where applicable) as a result of cumulative withdrawals. Please provide model-simulation results that illustrate the above mentioned concerns, and provide maps to document models and display results at the appropriate scale(s). Please show the cumulative predicted drawdown associated with the currently permitted withdrawals for all users, and the cumulative predicted drawdown associated with the requested withdrawals. Please submit all model input and output files (raw MODFLOW or Groundwater Vistas) in digital format and sign and seal all reports describing the results of the model-simulation results. Reference Rule 40D-2.301(1), F.A.C.
2. Please compare and discuss the differences between the calibrated model transmissivity and the aquifer transmissivity determined from on-site pumping tests. In addition, please provide all surficial and Floridan aquifer pumping test data and analyses.

Environmental Evaluation

The proposed site is located within a known area of karst topography and groundwater recharge. Strict adherence to the engineering standards for stormwater facilities and maintenance of existing floodplains will be required.

According to the information contained within Attachment B (Groundwater Modeling) of Volume 5, the impact evaluation to wetlands was addressed utilizing the minimum flows and levels (MFLs) criteria in Chapter 40D-8, F.A.C.

3. MFLs have not yet been established within or adjacent to the site certification assessment area. Therefore, please provide an impact evaluation of the water resources utilizing the Performance Standards in Section 4 of the Basis of Review, Chapter 40D-2, F.A.C.

The groundwater modeling graphic presented in Attachment B of Volume 5 is difficult to interpret due to the large size of the assessment area and the numerous interior contours.

4. Please show the specific wetlands expected to be directly impacted due to construction related activities on the site.
5. Attachment B of Volume 5 contains a table labeled "Summary of Wetland Areas with 1.0 ft or Greater Drawdown in Surficial Aquifer." In order to accurately assess the potential for adverse wetland impacts according to habitat type, please include within the table, wetland acreages based upon FLUCCS codes. Reference Sections 40D-2.101 and 40D-2.301, F.A.C.
6. The groundwater modeling assessment stated that 138 acres of wetlands would be impacted by 1 foot or more drawdown from the normal operation of the groundwater pumping wells. What actions are proposed to prevent these drawdowns from adversely impacting these wetlands?

Requested Quantities

The application requests a peak month quantity of 5,850,000 gallons per day (gpd). The purpose and time frame for using this quantity of water is unclear.

7. Please discuss the need for the requested peak month quantity. When will this quantity of water be needed and for how long?
8. Please explain the difference between the Normal Demineralized Water Makeup Rate of 350 gallons per minute (gpm) listed in Table 3.3-2 and the Annualized Cycle Average Makeup Source Rate of 44.6 gpm provided by Westinghouse in Table 3.3-1.
9. Please discuss the alternative technologies evaluated to minimize the consumptive use associated with evaporation from the Service Water System cooling towers?
10. Was the use of re-cycled storm water evaluated to reduce the amount of groundwater to be used? Please discuss other alternative water sources that have been considered to reduce groundwater use?

Barge Canal Withdrawals

CEMEX's Inglis Mine is located approximately four miles southwest of the proposed intake location. Elevated levels of chlorides and other constituents are currently showing up in some of the monitoring wells at the site. It is stated in the application that during normal operations, water in the barge canal will essentially be sea water from the Gulf of Mexico, effectively changing the normal conditions within the canal.

11. What effect will the increase in salinity in the barge canal have on the water quality of the Inglis Mine and surrounding area?
12. How will the withdrawal of water from the barge canal affect the ecology and water quality of the Withlacoochee River downstream of the Inglis dam, within the barge canal, the adjacent estuary, and designated Outstanding Florida Waters (OFW) areas, during various stream flow regimes and barge canal withdrawal regimes?

Dewatering During Construction

Dewatering will be required during construction of the two units. A dewatering plan was not included in the application.

13. Please describe the construction related dewatering activities and the expected drawdown.
14. How much water will be pumped during dewatering activities and where will the water be discharged?
15. What will be the duration of the dewatering activities at each unit construction site?

Boring and Well Information

Logs of borings A-10 and A-17 were provided with the application. It is unclear where these borings are located in relation to the proposed plant sites. Also, boring logs, well construction details, water quality data, water levels, and geophysical logs for all monitoring wells and test wells were not provided with the application.

16. Please provide copies of boring logs, well construction details, geophysical logs (if available), water levels, and water quality data for all borings, monitoring wells, and test wells completed at the site and provide a map showing the locations.

II. DISTRICT LAND RESOURCES

Transmission Line Corridors

This proposed transmission corridor crosses and potentially impacts seven District land resources: Halpata Tastanaki Preserve, Two Mile Prairie, Lake Panasoffkee, Annutteliga Hammock, Upper Hillsborough FDA, Lower Hillsborough FDA, and Brooker Creek Preserve. As stated in the application, the proposed corridor co-locates with existing transmission line corridors that vary in width. If acquisition of easements or other property interests becomes necessary to secure any right of way on or through District properties, additional information will be necessary, to include independent appraisals, certified boundary surveys and detailed surveys of natural resources and archaeological information within proposed new corridors on District lands. There are some generic questions that apply to all corridors that may be sited on District lands that were not clearly addressed in the application. They are as follows:

1. District Acquisition Purpose: Explain how compensation will be given to the District for disturbance and alteration of wetlands on District owned conservation lands that were acquired for water resource protection.
2. Public Use: Given the length and connectivity of these power line corridors, explain whether PEF will allow expanded corridors to be utilized as connector recreation trails to enhance public use opportunities.
3. Land Management: Explain how the District's prescribed burning practices on adjoining District lands will be affected by the expanded power lines. Explain how PEF will maintain exotic vegetation in the expanded areas to prevent infestation of adjoining lands.

Specific Property Concerns

Specific concerns per property are listed below:

Halpata Tastanaki Preserve – Marion County

A current corridor in Sections 18 and 19 in Township/Range 17/20 and STR 24/17/19 in southern Marion County is also part of the LPN proposed corridor. The current 420 foot wide easement granted to Florida Power through District-owned Halpata Tastanaki Preserve may be adequate for the LPN Corridor. Widening the corridor would impact property purchased for conservation purposes.

4.. Please identify and address any compatibility issues between the purposes for acquisition and the proposed power line corridor.

Two Mile Prairie – Citrus County

A current corridor in Sections 25, 26, 34 and 35 in Township/Range 17/19 in northern Citrus County is also part of the LPN proposed corridor. This corridor runs through District-owned Two Mile Prairie. However, a partial release of easement recorded in Book 1164/Page 0455 of the official records of Citrus County was granted in December, 1996. This partial release of easement removed Florida Power's right to utilize the entire portion of this corridor lying within Two Mile Prairie. District staff is not able to locate any instruments authorizing such land use on this property subsequent to this recording. The granting of additional interests in this property may be required to proceed. Widening the corridor beyond the footprint of the 420 foot wide easement released in 1996 would impact property purchased for conservation purposes. Two Mile Prairie is jointly owned by the Board of Trustees of the Internal Improvement Fund and the District but managed by the Department of Forestry under a management agreement between the District and DOF.

5. Please identify and address any compatibility issues between the purposes for acquisition and the proposed power line corridor.

Lake Panasoffkee – Sumter County

Near Sections 32, 33, 34 and 35 in Township/Range 18/22 and Sections 3, 4, 5 and 10 in Township/Range 19/22, the proposed corridor lies north of Route 44 and West of Interstate 75 resulting in no impacts to District lands. If the corridor is expanded south of 44 and/or east of 75 in this area, the Lake Panasoffkee Tract may be affected. The Lake Panasoffkee Tract was purchased for conservation purposes.

6. Please identify and address any compatibility issues between the purposes for acquisition and the proposed power line corridor.

Annutteliga Hammock – Hernando County

In Sections 15, 22, 27 and 34 in Township/Range 21/18, the proposed corridor runs through an existing power line corridor none of which the District owns. The existing corridor is contiguous with several District-owned parcels that were purchased as part of the Annutteliga Hammock project. If the proposed facilities remain within the existing 295 foot wide corridor, District Lands will not be affected. If the corridor is widened, several District-owned parcels will be affected. Annutteliga Hammock was purchased for conservation purposes.

7. Please identify and address any compatibility issues between the purposes for acquisition and the proposed power line corridor.

Upper Hillsborough – Polk County - PEF proposes to collocate with an existing power line corridor at this point (see map). This new corridor will impact the conservation easement held by the District over parcel 13-508-103C totaling 7,000 acres. The conservation easement was purchased by the District for preservation and protection of water quality protection, flood protection and natural systems. As stated in the application, new easements will be needed from the fee simple and easement owners. The added widening and clearing of the existing corridors will impact existing natural areas and wildlife which is contrary to the purposes for acquisition and the conservation easement.

8. Please identify and address any compatibility issues between the conservation easement and the proposed power line corridor.

Lower Hillsborough FDA – Hillsborough County - PEF proposes to collocate with an existing transmission corridor. This property was purchased for preservation and protection of water quality protection, flood protection and natural systems. The initial purchases were to support construction of the Four River Basins flood control project a partnership project with US Army Corps of Engineers. The public purpose of this property as a flood control project should not be affected by the public purpose of the power line corridor. The entire western portion of the property has a man-made levy to keep floodwaters from the Hillsborough River in the river flood basin. As stated in the application new easements will be needed from the fee simple owner. As a Four River Basins flood control project this is a certified recreation area. A partnership agreement with the Corps and Hillsborough County has been in place since the early 1970's and resulted in the construction of several park sites within a 16,000 acre tract of conservation land. The parks are considered premier sites for Hillsborough County and additional widening and clearing of the existing corridors will impact existing natural areas and wildlife and likely impact the parks which is contrary to the purposes for acquisition.

9. Please identify and address any compatibility issues between the Four River Basins flood control project purpose, the regional recreation use on the property and the District's purposes for acquisition.

Brooker Creek Headwaters Preserve – Pinellas County - PEF proposes to collocate with an existing transmission corridor. This property was purchased for preservation and protection of water quality protection, flood protection and natural systems. Pinellas County manages the property as a part of its land holdings adjoining District lands. This is one of the remaining natural areas in Pinellas County and considered a premier regional recreation area and environmental education site. Additional widening and clearing of the existing corridors will impact existing natural areas and wildlife and likely impact the park which is contrary to the purposes for acquisition.

10. Please identify and address any compatibility issues between the regional recreation use on the property, the District's purposes for acquisition and the proposed power line corridor.

III. REGIONAL WATER SUPPLY PLANNING

1. Lake Rousseau is not listed in Part 3 of the applicant's Environmental Report. Please provide additional information specifically addressing potential impacts to this water body, which has been identified as a potential water supply source by the District and by the Withlacoochee Regional Water Supply Authority.
2. Attachment E of the application does not include information on the new plant designs for water conservation. The applicant is proposing a Westinghouse AP1000 pressurized water reactor for this site. The District will require that the applicant use the lowest water quality available for the proposed use. Please provide additional information describing any water-conserving plant designs and anticipated conservation to be achieved from such designs.

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