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June 24, 2008

Mr. Mike Halpin, PE.
Florida Energy & Siting Coordination Office
Department of Environmental Protection
2600 Blair Stone Road MS-48
Tallahassee, Florida 32399-2400

SUBJECT: Completeness Statement for Progress Energy Florida's Levy Nuclear Plant Units 1 and 2 Site Certification Application

Dear Mr. Halpin:

Withlacoochee Regional Planning Council (WRPC) staff has examined the above-referenced document as it relates to the region: Citrus, Hernando, Levy, Marion and Sumter Counties. This application will require close evaluation to determine its consistency with the region's Strategic Regional Policy Plan (SRPP). Pursuant to the requirements of Section 403.5066 of the Florida Statutes, WRPC staff finds the information submitted in the application to date should allow for such a determination, except where indicated as follows:

1. Section 4.5 the Site Certification Application (SCA) generally discusses plant water use, including anticipated aquifer groundwater withdrawals. It references Section 3.3 of the Environmental Report (ER), and Section 6.3 of that same document outlines how hydrological monitoring would occur during plant construction and operation. Per the scale of projected groundwater use cited in Section 4.5.3 of the SCA, between 1.3 million and 5.8 million gallons daily, staff requests the applicant define and address fully in the site certification application the range of potential local to regional aquifer and connected natural systems impacts. Then, having established freshwater use impacts, how might current plans be adapted to promote conservation or reuse of groundwater resources?
2. Sections 4.7.2, 6.4.1 and 6.4.2 of the SCA cover on-site hazardous waste generation and off-site disposal. Section 3.8 of the ER identifies truck transport as the preferred mode for radioactive waste disposal. What analysis or decision-making criteria support this mode choice for hazardous and radioactive waste removal? What are the benefits of alternative mode choices? Specify what procedures and safeguards would apply to the transportation of all solid waste both to and from the plant site. Would the proposed program of radiological monitoring encompass routes utilized for hazardous and radioactive waste transport?

3. Section 4.4.2 of the SCA addresses the emission of particulate matter from mechanical draft cooling towers, but Section 6.6.2 states that no air quality monitoring shall occur on-site. The SCA identifies this phenomenon as the primary source of gaseous emissions resulting from construction of the proposed plant. Are there opportunities to measure air quality as part of other monitoring activities? If no monitoring will occur, what surplus control technologies might be utilized to further reduce particulate matter release beyond best available technology?
4. Section 4.5 of the ER describes radiological impacts during plant construction. Section 3.5 of that document explains the Levy Nuclear Plant's waste management system, and it clarifies how the liquid and gaseous waste management system elements conduct radioactive effluent and emission release. Chapter 5 of the ER relates potential radiological impacts of plant operation including: exposure pathways, waste hazards, and other aspects of plant operation. In Chapter 6, the ER details the applicant's intended program of radiological monitoring. Of all the measures controlling radiological impacts of plant construction and operation, what action has the applicant voluntarily undertaken above that minimum necessary to obtain required plant licensing and permit approvals?
5. Section 4.11 of the SCA states that an Emergency Preparedness Disaster Plan would be created and submitted to the Florida Department of Community Affairs for review. When would this occur? What categories of risk and hazard would that plan generally identify, and which would be addressed elsewhere? Which existing public emergency planning documents may need to be modified as a result of project development? Would other new plans be required? In what documents would emergency evacuation routes be identified, and how would the public be made better aware of vital emergency planning information? Through partnership as well as direct support at the county and municipal levels, does the applicant intend to enhance local government emergency management capacity to increase level of response preparedness?
6. Chapter 6 of the SCA refers the reader to Chapter 5 of the ER for explanation of water use impacts stemming from plant operation. Section 4.2.1.5 of the ER discusses impacts to wetlands during construction, and 5.2.1.5 discusses the impact of plant operations on wetlands. ER Section 5.2.2.3 discusses the impacts of groundwater use and mentions potential for adverse effects to wetlands, owing to groundwater consumption. What scale of impact could result to wetlands on-site and in the vicinity as a result of proposed groundwater extraction? How could this impact planned wetland mitigation efforts during construction and plant operations phases? What long-term impacts exist?
7. Section 4.5.1.1 of the SCA discusses the system to manage residual heat output from the plant. The ER's Section 5.3.2 specifically discusses cumulative impacts to the aquatic ecosystem owing to increased heat and chemical discharge due to plant operation. As outlined in Chapter 6, the ER gives details of a thermal monitoring program. What additional control technologies could yield extra mitigation of impact to regionally significant waters, fisheries, and aquatic ecosystems?

8. Section 4.5.1.4 of the SCA discusses organism removal from the cooling water intake system. What provisions has the applicant made to obviate adverse impact to marine life, especially endangered West Indian (Florida) Manatee and sea turtle species, which have been known to inhabit the Cross Florida Barge Canal? What other measures could the applicant voluntarily pursue to reduce potential conflicts between wildlife and proposed plant operations?
9. Section 5.0 of the SCA cites Section 4 of the ER to expound impacts related to project construction. ER Section 4.1.1.2.1 states that the plant site will be filled and graded to a general elevation of between 47' to 50'.
Oppositely, Figure 3.1.2 (Sheets 2, 3, and 4), contained in the ER, appears to show plant site elevation and building height indexed from a grade elevation of 100'. Correspondingly, the subterranean *basemat* is then correctly depicted at an elevation of 60.5'. ER Section 4.2.1.5 evidences this interpretation of Figure 3.1.2; as it describes *basemat* placed to a depth of 39.5' feet. Yet this same section also mentions excavation may reach as much as 75' from *ground surface* for some structural elements.

While in all cases it is understood that filling would happen to elevate cooling towers and reactors above the 100-year floodplain, this presentation makes it unclear the depths to which excavation may occur on-site. Uniformly referencing a standard measure—such as mean sea level—would help clarify the scope of excavation and therefore any impacts to the subject location and vicinity. With proposed excavation activity defined, what potential aquifer impacts could result?

10. Section 5.2.2 of the SCA directs the reader to Chapter 6 of the ER for exposition of project impact monitoring. Section 6.1 of the ER identifies where the plant's residual thermal output could impact existing conditions in water bodies around the subject location, and it outlines supporting methodology for a program of vicinity water temperature monitoring. In so doing, this section extensively references Tables 6.1.1 through 6.1.3, which contain no data. Whereas in many cases data would not exist until a future point of collection, will background water temperature data now available be made publicly accessible? Likewise, to what extent will pre-application monitoring data be available as it pertains to current aquatic ecosystems and other categories of background conditions? Generally, how are the monitoring process and supporting methodologies—covered in ER Section 6.0—structured to recognize impacts directly attributable to project development as an independent variable?
11. Section 7 of the SCA discusses the economic impacts of the Levy Nuclear Plant. Has the applicant considered what other types of economic uses might benefit from co-location either on-site or in proximity to the Levy Nuclear Plant and Crystal River Energy Complex?
12. Electrical transmission facilities would require the construction of new substations and other associated infrastructure. What actions can the applicant take to minimize the total amount of new impervious surface area created as a result of these improvements?

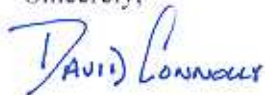
13. If options exist for transmission facility placement within individual corridors, what criteria would cause a decision to cross land having designated conservation status or traverse a route in close proximity to transportation rights-of-way?
14. All first and second magnitude natural springs in a study area county or counties should be noted on maps identifying major water bodies and resource features. Specifically, how could best practices limit total impact to springs during transmission facility construction and maintenance phases?
15. Construction of electrical transmission facilities would require clearing of areas in preparation for use as right-of-way. Maintenance of right-of-way would impose additional limitations and conditions on natural systems. Understanding that the applicant intends to minimize impacts on water bodies, wildlife and the landform, what specific mitigation actions would follow the clearing of wetlands and uplands or the crossing of freshwater bodies and identified habitat areas?

Withlacoochee Regional Planning Council staff recommends the applicant make specific response to the preceding comments and questions; and, until that time, agency staff cannot determine the application to be complete. If the applicant maintains information currently submitted is sufficient to address a given concern, then please reference exactly where in the existing documentation such answers are provided. If an answer may be deduced from information already submitted, staff would still ask the applicant to provide explanation of all necessary facts.

Staff appreciates the opportunity to comment and looks forward to continuing to participate in this process.

Thank you.

Sincerely,



David Connolly
Principal Planner

Cc: Mr. Paul Darst, Department of Community Affairs (DCA)
Mr. Kevin Smith, Citrus County Planning Department
Mr. Ron Pianta, Hernando County Planning Department
Ms. Shenley Neely, Levy County Planning Department
Mr. Dwight Ganoe, Marion County Planning Department
Mr. Brad Cornelius, Sumter County Planning Department
Mr. Norm Fugate, City Attorney for the City of Inglis
Ms. Jerri A. Blair, City Attorney for the City of Wildwood
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Ms. Cyndi Mulkey, Siting Coordination Office
Ms. Ann Seiler, Siting Coordination Office