

From: "Rick Parrish" <rparrish@selcva.org>
To: <North_Anna_comments@nrc.gov>
Date: Tue, Sep 12, 2006 3:39 PM
Subject: comments on North Anna Supplemental Draft EIS

The attached comments, with enclosures, are submitted on behalf of Public Citizen, Nuclear Information and Resource Service and the Blue Ridge Environmental Defense League. Thank you.

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September 12, 2006

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Re: Comments on North Anna Supplemental DEIS
NUREG-1811, Supplement 1

To Whom It May Concern:

We appreciate the opportunity to submit these comments on behalf of Public Citizen, Nuclear Information and Resource Service and the Blue Ridge Environmental Defense League, intervenors in the Early Site Permit proceeding for the Dominion Nuclear North Anna ESP application. These comments should be read to supplement comments we submitted on the Draft EIS on March 1, 2005, as well as comments submitted then and now by the individual organizations and their members.

The modifications to the cooling system design for Unit 3 reflected in the Supplemental Draft EIS substantially address concerns dealing with release or discharge of heated water to Lake Anna. However, evaporative loss of cooling water from the cooling towers remains a significant concern, especially in the North Anna and Pamunkey Rivers downstream from the Lake during periods of drought. The Second Affidavit of Shawn Young, prepared for the contested portion of the ESP proceeding and a copy of which is submitted with these comments, spells out additional data and analysis that is needed to ensure that reduced downstream flows do not harm striped bass and other fish. Comments we submitted to the Virginia Department of Environmental Quality on September 8, 2006 regarding potential impacts of additional reactors on the coastal zone, copy also submitted herewith, expand upon these concerns. In particular, the NRC should explain how its analysis concludes that low flows downstream of Lake Anna, represented by a release from the dam of 20 cfs, will be present 11% of the time, compared to Dominion's calculation of 7%, both increased from 5.2% figure for current operation of Units 1 and 2. Compare Supp. DEIS at 5-11 with Dominion ER at 3-5-14, 16.

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In addition, the Supplemental Draft EIS acknowledges that several communities along the North Anna and Pamunkey Rivers are contemplating using the rivers as a source of drinking water. This could create a conflict between water uses, with evaporative loss at the North Anna nuclear plant interfering with downstream communities' ability to rely on North Anna and Pamunkey Rivers for drinking water. While the ultimate resolution of this potential conflict may be up to the Commonwealth of Virginia, the NRC is obligated to fully evaluate the potential for such a conflict in the final EIS.

The final EIS should answer these and other questions about potential impact of reduced flows downstream of Lake Anna and steps that could be taken to reduce or eliminate such impacts. We look forward to a resolution of these concerns.

Sincerely,



Richard A. Parrish
Senior Attorney

Counsel for Public Citizen, NIRS and BREDL

cc: Counsel for Dominion
Counsel for NRC Staff