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DESCRIPTION:
Ltr re our 4-23-73 ltr...furnishing comments on Draft Enviro Statement.....

ENCLOSURES:

ACKNOWLEDGED DO NOT REMOVE

PLANT NAME: H. B. Robinson, Unit # 2

FOR ACTION/INFORMATION 6-25-73 fod

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FEDERAL POWER COMMISSION
WASHINGTON, D.C. 20426

IN REPLY REFER TO:

50-261

JUN 21 1973

Mr. Daniel R. Muller
Assistant Director for
Environmental Projects
Directorate of Licensing
U. S. Atomic Energy Commission
Washington, D. C. 20545

Dear Mr. Muller:

This is in response to your letter dated April 23, 1973, requesting comments on the AEC Draft Environmental Statement relating to the continuation of the Facility Operating License DPR-23 for Carolina Power and Light Company's H. B. Robinson Steam Electric Station Unit No. 2 (Docket No. 50-261).

The following comments review the need for the 700-megawatt, nuclear H. B. Robinson Unit No. 2 in regard to the adequacy and reliability of the affected power systems and matters related thereto, and are made in compliance with the National Environmental Policy Act of 1969 and the April 23, 1971, Guidelines of the Council on Environmental Quality.

In preparation of these comments, the Federal Power Commission's Bureau of Power staff has considered the AEC Draft Environmental Statement; the Applicant's Environmental Report and Supplement thereto; related reports made in response to the Commission's Statement of Policy on Reliability and Adequacy of Electric Service (Docket R-362); and the staff's analysis of these documents, together with related information from other FPC reports. The staff generally bases its evaluation on the need for a specific bulk power facility upon long-term considerations as well as upon the load-supply situation for the peak period immediately following the availability of the new facility. It should be noted that the useful life of the H. B. Robinson unit is expected to be 30 years or more. During that period the unit will make a significant contribution to the reliability and adequacy of electric power supply in the Carolina Power and Light Company's service area.

The Carolina Power and Light Company is one of several utility systems located in the Virginia-Carolinas (VACAR) area of the Southeastern Electric Reliability Council (SERC). Although the Applicant's system is interconnected with other neighboring utility systems located in the VACAR area, and with the Tennessee Valley Authority, no formal pooling arrangement exists in the VACAR area; each system operates independently. The Applicant is a member of SERC, which to some extent coordinates the planning and operation of the members' bulk power supply facilities. The VACAR area systems have experienced high rates of growth of load which, despite continuing construction of new generating facilities, have resulted in lower than desired reserve margins during recent summer peak load periods.

The H. B. Robinson Unit 2 has been in commercial operation since March 1971, and had provided over 7 billion kilowatt-hours of net electrical output by the end of 1972. A recent study by this Commission for the 1973 summer peak load period shows the unit will represent 13.3 percent of the net capacity resources of 5,504 megawatts on the Applicant's system, including the 720-megawatt Roxboro Unit No. 3 placed in commercial service in March 1973. A reserve margin of 738 megawatts is forecast, or 15.5 percent of the estimated peak load of 4,766 megawatts. The 730-megawatt "stretch" capacity of the H. B. Robinson Unit 2 represents 99 percent of total capacity reserves available to the Applicant. Unavailability of the unit during this period would result in capacity barely sufficient to meet the projected loads with no reserve for meeting operating contingencies. It is probable that voltage reductions or interruptions of electric service to customers would occur if emergency power were not available during most days during the summer.

In the 1974 summer period, the effect of the unavailability of this nuclear unit would be no less severe. The Applicant has planned for installation of 630 megawatts (summer rating) of new internal combustion turbine generating units to be available March 1974, since the 821-megawatt Brunswick Units 1 and 2 which were scheduled for commercial service in March 1975 and March 1974 respectively, are rescheduled now for December of these years. The 1974 system reserves without the H. B. Robinson unit would total 89 megawatts.

The need for the capacity of the H. B. Robinson Unit 2 to provide baseload capacity to meet system loads will continue during the expected 30-year or longer life of the plant. The Applicant's substantial capital investments in this unit, and others under construction, were made to acquire baseload units to fulfill system capacity requirements needed to meet the escalating system loads. In generating over 7 billion kilowatt-hours of output by the end of 1972, the Robinson nuclear unit produced electric energy which, if obtained by the consumption of alternate fuels, would have required about 70 billion cubic feet of natural gas or 500 million gallons of fuel oil.

Alternatives to the nuclear unit and transmission lines associated with the plant are discussed adequately in the Draft Environmental Statement.

The H. B. Robinson Unit 2 is currently in operation and the impacts of the plant's construction and initial operation have already occurred. Since the need for the plant's capacity will continue for the foreseeable future, the only alternative would be the construction of a plant on a new site which would impose the environmental effects of construction and operation on the area of the new site.

In view of the serious consequences of an inadequate supply of electric power, the staff considers it prudent that a full-term license be issued to the Carolina Power and Light Company for the continued operation of the H. B. Robinson Steam Electric Plant Unit 2.

Very truly yours,

T. A. Phillips
Chief, Bureau of Power

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