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Notice of Receipt and Availability of Application for a Combined License

**Comment On:** NRC-2009-0337-0020

Combined License Application for Turkey Point Nuclear Plant, Unit Nos. 6 and 7; Draft Environmental Impact Statement

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Comment on FR Doc # 2015-05099

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145

## General Comment

Florida Power & Light argues that its new nuclear project is environmentally friendly, that it will benefit us economically, and that its future plans at Turkey Point are safe. Unfortunately, none of these claims are accurate.

FPLs project would reduce the availability of fresh water for our communities, it would commit South Florida to antiquated and expensive nuclear technology from the last century, and it would render our electric system vulnerable to storm surges from rising seas.

Nuclear plants consume vast amounts of water to keep reactors cool. FPL currently accounts for less than 1 percent of the water used in Miami-Dade County, but a nuclear expansion would raise that to 10 percent of water usage. In two decades, the demands on our limited water supply are already projected to skyrocket. FPL emphasizes that the primary cooling system will use reclaimed wastewater. But it ignores the inconvenient fact that its backup cooling system will also draw over 7 billion gallons of water a year from Biscayne Bay and the Biscayne Aquifer, our only source of drinking water, threatening the coastal Everglades, Biscayne National Park, and South Dade well fields. Given the anticipated demands on our shrinking water supply, FPLs water grab is an irresponsible use of resources. In addition, on May 19th, 2015, FPL had to obtain an emergency permit from the South Florida Water Management District to pump more water into the Turkey Point cooling canals as a result of a cooling problem with the existing nuclear reactors that FPL has been dealing with for over

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a year.

FPLs project commits us to expensive nuclear power for the next 60 years without fairly evaluating more cost-effective energy that does not require local storage of radioactive waste. The cheapest, cleanest and safest way to meet our energy needs is through energy conservation and efficiency. Conservation is one-fifth the cost of nuclear generation, yet FPL opposes conservation standards and presses for nuclear, the most expensive and risky investment available..

Florida law allows FPL to charge its customers for the licensing and construction costs for this project. In the past three years, FPL has charged us \$209 million. Even if FPL never completes the new reactors, it keeps our money. These charges include new transmission lines in Everglades National Park and the heart of Miami-Dades dense commercial and residential neighborhoods. Massive 105-foot tall towers along Dixie Highway would cut through Pinecrest, South Miami, Coral Gables, Coconut Grove, and then Brickell, on their way into downtown Miami, carving tens of millions annually from the countys tax base and killing thousands of jobs in the process. The proposed transmission lines will not be built to Florida hurricane safety standards. If a tower buckles during a storm, it could destroy the Metrorail and surrounding homes.

The original decision to build nuclear reactors at Turkey Point, on a hurricane-swept coastline vulnerable to storm surge, was made a half a century before we understood climate change and sea-level rise. FPLs new reactors would operate until 2080, during which, the National Oceanic and Atmospheric Administration (NOAA) recommends that power plants account for three feet to 6.6 feet of sea-level rise. FPLs application accounts for only one foot of sea-level rise for that period, clearly unrealistic given the five inches of sea-level rise measured locally in the past five years.

Even one foot of sea-level rise will inundate the area surrounding Turkey Point and turn the power plant into a remote island. A difference of two feet of sea-level rise will dramatically affect the height of future storm surges. FPLs assertion that new reactors will be safe from a storm surge because they are 26-feet above sea level, overlooks the facts that FPLs sea level standard is 27 years old; and the project does not properly account for realistic storm surge projections. FPL ignores these facts to double down on a dangerous position based on yesterdays science.

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