

# REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251  
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SUBJECT: Comments on DES for steam generator repair. Strict monitoring of radioactivity in marine preserves recommended to insure against permanent increases in activity due to repairs.

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# United States Department of the Interior

OFFICE OF THE SECRETARY  
WASHINGTON, D.C. 20240

ER 81/1

FEB 20 1981

Mr. Steven A. Varga  
Chief, Operating Reactors  
Branch #1  
Division of Licensing  
Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Varga:

The Department of the Interior has reviewed the draft environmental statement for Steam Generator Repair at Turkey Point Plant, Units 3 and 4, Dade County, Florida. We have the following comments and recommendations.

The Turkey Point Plant is located less than 1/2 mile west of Biscayne National Park, less than 1/2 mile northwest of Key Largo Coral Reef National Marine Sanctuary, 5 miles northwest of John Pennkamp Coral Reef State Park, 10 miles north of the American Crocodile National Wildlife Refuge, and 13 miles east of Everglades National Park. All these areas are protected, nationally significant resources many of which contain species on the Rare and Endangered Species List and are dependent on an uncontaminated fresh and salt water environment.

There is a definite connection between the water of Biscayne Bay and Card Sound with the water flowing through Turkey Point Plant's 168 miles of cooling canals. Although this is not direct because the canal system is closed off by earthen dams, there still exists an exchange of water through the porous Miami Oolite Rock into which the canals were dug. The canals were not lined to prevent this exchange, which is most noticeable when the tide levels change and the water in the canals rises and falls accordingly.

With this in mind, we are concerned that the increased level of radioactive water in the canal system will increase the amount of radioactivity in the surrounding waters of the marine parks, sanctuary, and refuge mentioned above. In addition to this, there will be radioactive gases emitted that could contaminate water and land resources through rainfall. We, therefore, recommend strict monitoring of radioactivity in these marine preserves to insure against any permanent increases in current radioactivity levels due to the repairs.

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It is anticipated in the Draft Environmental Impact Statement that the fossil-fuel burning Units 1 and 2 will have to be used more during this repair. With this increased use, air quality in the area will decrease. Everglades National Park is designated a Class I air quality area and Biscayne National Park has been nominated as a potential Class I area.

This requires maintaining a high level of air quality in these national parks. All businesses, government bodies, and others are to insure that their actions are not reducing the standard of air quality established for Class I areas. The Nuclear Regulatory Commission should insure that the Turkey Point Plant repairs do not cause the lowering of air quality for Everglades National Park and Biscayne National Park. Approved pollution control devices should be in place and functional in the exhaust stacks of Units 1 and 2.

The water transportation route for moving each of the six generators was not specifically defined in the Draft Environmental Impact Statement. The generators will contain an amount of radioactivity and are scheduled for six separate barge trips. No matter what route is to be used, the generators will have to pass through the center of Biscayne Bay and Biscayne National Park. It is preferred that the route used should be northeast along the Turkey Point access channel then north along the Intercoastal Waterway, then east through Biscayne Channel (south of Cape Florida), to the Atlantic Ocean. This would bypass the live coral reefs, which are protected in John Pennekamp Coral Reef State Park and Biscayne National Park.

Coordination through a Memorandum of Agreement should be established among the Nuclear Regulatory Commission, our National Park Service, the U.S. Coast Guard, and the State of Florida to clear the area of boat traffic through Biscayne Bay to the Atlantic Ocean, during transport of contaminated generators by barge. In addition, barge movements should occur only during good wave and weather conditions and only after receiving clearance from the U.S. Coast Guard.

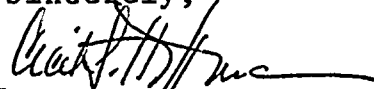
We also recommend that the casing around the generators provide adequate shielding from radiation exposure to the resources of Biscayne National Park and that barges to be used are inspected and certified for seaworthiness prior to use.

The Department's National Park Service contact for further coordination and preparation of a Memorandum of Agreement is Regional Director, Southeast Region, (Attention: Dr. Jay Gogue, Chief Scientist) 75 Spring Street, S.W., Atlanta, Georgia 30303, telephone (404) 221-3643, FTS: 242-3643.



We hope this will be of assistance to your effort.

Sincerely,



CECIL S. HOFFMANN  
Special Assistant to  
~~Assistant~~ SECRETARY

