



SUNSI Review Complete

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November 28, 2018

May Ma, Director, Program Management
Announcements and Editing Branch
Office of Administration
Mailstop: TWFN-7A60M
US Nuclear Regulatory Commission
Washington, D.C. 20555-0001

RE: **DOCKET ID NRC-2018-0101**

Florida Power and Light Application for Renewal

**Facility Operating License No. DPR-31 and DPR-41 AND Power & Light
(FPL)**

Permit No. 0193232-182, Everglades Mitigation

Bank Phase II

Modification and Credit Release from the Miami-Dade County

Division of Environmental Resources Management (DERM).

Dear Ms. Ma,

The Greater Key West Chamber of Commerce would like to express its deepest concerns about Florida Power and Light (FPL)'s Turkey Point facility. Recently, we have been informed by our Florida Keys Aqueduct Authority (FKAA) of very serious issues impacting our water supply. We are aware of three (3) issues the FKAA, Monroe County and the Ocean Reef Community Association (ORCA) have brought to our community's attention: 1. FPL's failure to comply with its consent order as it pertains to Turkey Point; 2) FPL's application to the Nuclear Regulatory Commission (NRC) for a second twenty-year license renewal at the Turkey Point facility; and 3) FPL's permit modification with FDEP to lower the surface water elevation at Structure L-31, contrary to the 2015 Consent Agreement with Miami Dade Department of Environmental Resource Management (DERM).

The Chamber is beyond disconcerted in FPL's blatant disregard for its obligations under the Consent Order and the safety of our water supply. We ask the NRC and FDEP to deny any and all permit applications/modifications by FPL under the current terms. FPL should be required to immediately decommission its cooling canal system and remediate the existing hypersaline plume threatening our water supply.

We are aware that, for more than a decade, FPL has been out of compliance with operating requirements of its cooling canal system (CCS). The salinity values in the CCS have risen to concentrations significantly higher than found in seawater. A hypersaline plume has migrated more than two miles beyond FPL's property and contaminated a large portion of the Biscayne Aquifer. This hypersaline plume has also forced the freshwater-saltwater interface within the Biscayne Aquifer as much as four miles westward, which is farther than would otherwise naturally occur. This condition, which FPL has been ignoring for decades, is now starting to threaten critical drinking water supplies for south Miami-Dade, as well as all FCAA customers in Monroe County. **If the FCAA drinking water wellfield, which is located approximately ten miles from the Turkey Point Facility, becomes contaminated by the hypersaline plume created by FPL, the primary drinking water supply to Monroe County is lost.**

The State of Florida and Miami-Dade County have both found FPL in violation of their operating conditions and filed regulatory and permit violations against FPL. The Consent Orders FPL entered into, instead of challenging the violations, allow FPL to develop and implement a remediation strategy to reduce the artificially high salinities in the Biscayne Aquifer resulting from uncontrolled leakage from its CCS. They have not done so.

Actual data gathered from the FCAA's wellfield monitoring program indicate that the current FPL remediation strategy is:

1. Not effective in first halting and then retracting the migration of the existing hypersaline plume, and
2. Continued use of the CCS is only exacerbating the migration of the existing hypersaline plume.

Past and current operational practices by FPL have led to the environmental degradation of the Biscayne Aquifer and FPL has shown little interest in dealing with these unpermitted consequences of its operation until enforcement action was taken. Even with two Consent Orders in place, there is no clear evidence that FPL can or will resolve the issues caused by continued use of its CCS.

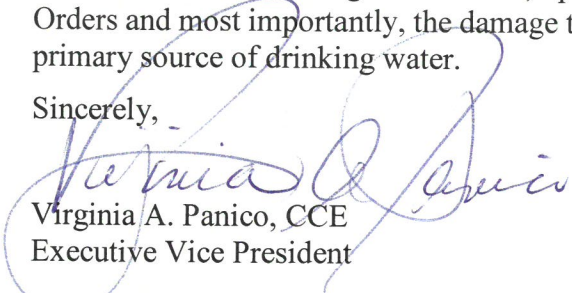
We agree with the FCAA that the existing damage to the local environment must be fully remediated before FPL is granted an extension to operate. We also agree that the NRC should require cooling towers to be built for use with the existing operation and the closure of the existing CCS.

To make matters worse, we are informed that FDEP recently issued an unsolicited permit change allowing FPL to lower the surface water elevation at Structure L-31E to 1.8 ft, which is in direct opposition to the operating strategy agreed to in their 2015 Consent Agreement with Miami Dade Department of Environmental Resource Management (DERM). Lowered headwater elevations in this canal will negatively impact the remediation and restoration efforts by allowing the hypersaline plume in the Biscayne Aquifer to travel further to the west as well as impact the surface waters of the L-31E canal, which up until recently, was a freshwater canal system. The Chamber fully supports FCAA's challenge to this permit modification.

The Chamber encourages the Monroe County Board of County Commissioners to participate in the NRC hearings requested by Southern Alliance for Clean Energy (SACE) as "interested governmental participants" as requested by ORCA. Further, we ask that FPL's application to the NRC with regard to Turkey Point be conditioned upon FPL immediately remediating the existing hypersaline plume, decommissioning the CCS and replacing the canal system with new cooling towers.

FPL should not be allowed to ignore the law, applicable regulations, its obligations under the Consent Orders and most importantly, the damage they have caused and threat they pose Monroe County's primary source of drinking water.

Sincerely,



Virginia A. Panico, CCE
Executive Vice President

CC: Teri Johnston, Mayor City of Key West
Jimmy Weekley, City Commissioner District I
Samuel Kaufman, City Commissioner District II
Billy Wardlow, City Commissioner District III
Gregory Davila, City Commissioner District IV
Mary Lou Hoover, City Commissioner District V
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Michelle Coldiron, County Commissioner District II
Heather Carruthers County Commissioner District III
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Holly Raschein, State Representative
Anitere Flores, Senator
Rick Scott, Governor
Carlos Curbelo, US Representative
J. Robert Dean, Chairman, District III
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Jim Scholl, City Manager
Cheri Smith, City Clerk
Shawn Smith, City Attorney
Roman Gastesi, County Administrator
Bob Shillinger, County Attorney
Kevin Maddox, County Clerk
Lea Crandall, Clerk of the Department, Office of the Attorney General
Timothy Rach, Program Administrator, Fla Dept of Environmental Protection
Lee Hefty, Director, Miami Dade County Division of Environmental Resources
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