

September 23, 1985

Docket Nos: 50-424
and 50-425

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Mr. Donald O. Foster
Vice President and General Manager
Georgia Power Company
Box 299A, Route 2
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Dear Mr. Foster:

Subject: Transmittal of Letters Commenting on the Vogtle FES and the
Shortnose Sturgeon

Enclosed are two letters for your information. The first is from Region IV
of the Environmental Protection Agency transmitting its comments on two areas
of the Vogtle FES: water quality/wetlands and noise. The second letter is
from the National Marine Fisheries Service and provides comments on the
shortnose sturgeon in the Savannah River.

Sincerely,

Elinor G. Adensam, Chief
Licensing Branch No. 4
Division of Licensing

Enclosures:
As stated

cc: See next page

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

MAY 15 1985

4PM-EA/CH

Ms. Melanie Miller
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Ms. Miller:

Pursuant to Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) entitled "Final Environmental Statement related to the operation of Vogtle Electric Generating Plant, Units 1 and 2" (EPA Log No. F-NRC-E00004-GA). Our review of this project has primarily concentrated on water quality, noise, wetlands, and air quality. We encourage you to also coordinate with other agencies regarding any new or remaining environmental or non-environmental factors.

As you recall, EPA's main concerns expressed in our comment letter on the Draft Environmental Impact Statement (DEIS) dated January 10, 1985, involved water quality and noise impacts.

WATER QUALITY/WETLANDS

Our comments regarding plant water quality (e.g., discharge; chlorination) have been adequately addressed in the FEIS. We appreciate your response efforts.

Regarding wetlands and water quality, EPA would like to emphasize the need to minimize wetland construction impacts in areas in or adjacent to the Ebenezer Creek Swamp, especially since the Swamp is designated by the National Park Service as a National Natural Landmark and as a state scenic river by the State of Georgia. Best Management Practices such as erosion control should be implemented with supervision and maintenance to reduce impacts on the water quality of wetlands. Access roads for construction should avoid filling wetland areas. Use of any fill should be minimized and coordinated through the Savannah District of the U.S. Army Corps of Engineers relative to the need for Section 404 permits. Any permanent sloughs and water channels should be crossed by bridging or open-bottom culverts adequately sized to accommodate the natural flow. Silt curtains should be employed at waterway crossings during construction. To minimize additional clearing, existing logging roads should be used whenever possible for access roads. In addition, for areas in or adjacent to the Swamp, we would prefer mechanical means used for any necessary right-of-way

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maintenance. Any herbicides used should be EPA approved and applied in accordance with label directions. If herbicides are anticipated, the FEIS could have been improved by including the specific herbicides that will be used (e.g., X chemical, a registered herbicide, will be used at X lbs. active ingredient per acre/roadway mile for plant control).

EPA believes that the modified plan for routing the high voltage transmission line through Ebenezer Creek Swamp utilizing taller transmission line towers should minimize the impact on the Swamp compared to the original alternative to clear-cut a 150-foot corridor. We encourage the use of a helicopter/crane to install towers in wetland areas to reduce access clearing, as indicated for the tower at Station 124.00 on page 5-3 of the FEIS.

NOISE

In our comments at the DEIS stage, EPA recommended that feasible mitigation measures for an off-site residence be considered by the applicant and the U.S. Nuclear Regulatory Commission (NRC) since the residence is predicted to be elevated 12 to 20 dBA by the transmission line. Although we acknowledge that the FEIS (pg. xi) states that "The application will be required to report annually in the Environmental Protection Plan any noise complaints received related to the high voltage line and their resolutions," EPA remains concerned about noise mitigation for this home site since no mitigation measures are listed for implementation (methods for resolving general complaints are also not presented). We believe the expected 12 to 20 dBA elevation is significant, despite the fact that the resultant noise level is a moderate 49 dBA L₁₀ (however, this is equivalent to 58 dBA in terms of intrusion and annoyance when evaluated against standard criteria, according to page 5-70 of the FEIS). Although we recognize that noise mitigation can be difficult and expensive, that only one receptor is involved and that noise levels are usually worst during precipitation periods and shortly thereafter, some relief should ultimately be provided (unless the resident does not wish any mitigation). In our view, such relief should be initiated by the applicant and/or the NRC (even if no formal complaint is received) and should be mutually acceptable to the resident and applicant/NRC. If a barrier wall is not feasible or functional, then receptor acquisition, receptor insulation (if noise levels within the residences have increased by 10 dBA or more), installation of central air conditioning in the residence (if not already so equipped), noise source reduction, or innovative methods should be considered.

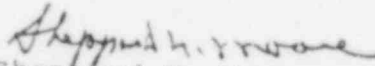
In addition to requesting noise mitigation, we offer the following noise comments:

- o Since noise from transmission lines is associated with wet periods, the FEIS could have been improved through the addition of an estimate for the number of days in a year such periods exist locally.

- o Assessment of the noise impact of the transmission line could probably be improved, since Figure 5.22 and 5.24 indicate that the nearest ambient monitoring stations are rather distant from the above-mentioned home site. We recommend that additional ambient noise measurements be made along the transmission line (particularly near the home site) to predict noise impacts to this and possibly other receptors. Determining the need for noise mitigation depends on such measurements.
- o We recommend that on-site noise monitoring measurements be made after implementation of noise mitigation methods to assure noise attenuation.

We were pleased to review the FEIS. With the exception of the remaining noise comments and request for noise mitigation, we believe the FEIS is generally a well developed document. We will look forward to your comments and request that they (at least comments regarding noise mitigation) be referenced in the Record of Decision. Should you have questions, my staff contact for this project is Chris Hoberg who is available at FTS/257-7901 or commercial 404/881-7901.

Sincerely yours,


Sheppard N. Moore, Chief
NEPA Review Staff
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cc: Mr. W. Thomas Brown
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National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE

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July 24, 1985

F/SER23:PWR:jm

Elinor Adensam
Chief, Licensing Branch No. 4
Division of Licensing
Nuclear Regulatory Commission
Washington, D.C. 20555

50-424
50-425

Dear Ms. Adensam,

This responds to your June 20, 1985, letter regarding the proposed operation of the Vogtle Electric Generating Plant, Units 1 and 2, and its potential effects on the endangered shortnose sturgeon (Acipenser brevirostrum) in the Savannah River. Pursuant to Section 7 of the Endangered Species Act (ESA) of 1973, the U.S. Nuclear Regulatory Commission (NRC) prepared a biological assessment (BA) regarding the potential impacts of the Vogtle units. This BA was transmitted to our office via the Vogtle DES on March 6, 1985; whereby, specific concerns regarding potential thermal and chemical effects surfaced. These concerns were transmitted in our March 15, 1985, letter and discussed with Ms. Melanie Miller and Dr. Charles Billups in a conference call on March 15, 1985. Your June 20, 1985, letter contains specific responses to our questions regarding cumulative, thermal, and chemical effects of the Vogtle Plant (i.e. cumulative effects with the nearby Savannah River Plant - SRP). The NRC staff involved in this consultation should be commended for the completeness and detail of their responses.

We have reviewed the BA and supplement documents and conclude, based on the information provided, that populations of endangered/threatened species under our purview would not be adversely affected by the proposed action.

We continue to remain apprehensive, however, regarding thermal and chemical discharges in the Savannah River and how these pollutants may affect the shortnose sturgeon. There continues to be a lack of data on the abundance, distribution, life history, and ecology of the shortnose sturgeon in the Savannah (particularly the effects of pollutants on the life stages of sturgeon). We therefore would recommend and encourage any continued research on the cumulative impacts of chemical and thermal discharges (such as the SRP study). In addition, studies that would assess the shortnose sturgeon population in the Savannah River would help us meet our Section 7 responsibilities. We are available to assist the NRC, SRP, or Vogtle staff in designing any studies that may be incorporated to further assess shortnose sturgeon.

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Regarding the review of SRP's thermal study results and Mr. Pat Whitfield's invitation to participate in an interagency meeting, we appreciate the opportunity to review the research. We are particularly interested in being notified if any sturgeon (and/or larvae) were collected in the impingement screens, sampling gear, etc. Due to our current situation with travel restrictions we will not be able to attend the meeting, but would welcome the proceedings and a draft copy of the study results.

This concludes consultation responsibilities under Section 7 of the ESA. However, consultation should be reinitiated if new information reveals impacts of the identified activity that may affect listed species or their critical habitat, a new species is listed, the identified activity is subsequently modified or critical habitat determined that may be affected by the proposed activity. If you have any questions, please contact Mr. Paul Raymond, Fishery Biologist, at FTS 826-3366.

Sincerely yours,



Charles A. Oravetz
Chief, Protected Species Branch

cc: F/M412
F/SER11