

# **Generic Environmental Impact Statement for License Renewal of Nuclear Plants**

## **Supplement 15, Second Renewal**

### **Regarding Subsequent License Renewal of Virgil C. Summer Nuclear Station, Unit 1**

Draft Report for Comment

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United States Nuclear Regulatory Commission

*Protecting People and the Environment*

NUREG-1437  
Supplement 15  
Second Renewal

# **Generic Environmental Impact Statement for License Renewal of Nuclear Plants**

## **Supplement 15, Second Renewal**

### **Regarding Subsequent License Renewal of Virgil C. Summer Nuclear Station, Unit 1**

Draft Report for Comment

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## COMMENTS ON DRAFT REPORT

2 **Proposed Action** Issuance of subsequent renewed facility operating license NPF-12 for  
3 Virgil C. Summer Nuclear Station, Unit 1, located in Jenkinsville, South  
4 Carolina

5  
6 **Type of Statement** Draft Supplemental Environmental Impact Statement

7  
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14  
15 **Comments:**

16 Any interested party may submit comments on this draft supplemental environmental impact  
17 statement (SEIS). Please specify "NUREG-1437, Supplement 15, Second Renewal, draft," in  
18 the subject or title line for your comments. Comments on this draft SEIS should be filed no later  
19 than 45 days after the date on which the U.S. Environmental Protection Agency notice, stating  
20 that this draft SEIS has been filed with the U.S. Environmental Protection Agency, is published  
21 in the *Federal Register*. Comments received after the expiration of the comment period will be  
22 considered if it is practical to do so, but assurance of consideration of late comments cannot be  
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2 **Responsible Agency:** U.S. Nuclear Regulatory Commission, Office of Nuclear Material Safety  
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7 Report for Comment (NUREG-1437). Virgil C. Summer Nuclear Station is located in  
8 Jenkinsville, South Carolina.

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## ABSTRACT

18 The U.S. Nuclear Regulatory Commission (NRC) prepared this draft supplemental  
19 environmental impact statement in response to an application submitted by Dominion Energy  
20 South Carolina, Inc. (Dominion) to renew the operating license for Virgil C. Summer Nuclear  
21 Station, Unit 1 (V.C. Summer), for an additional 20 years. This supplemental environmental  
22 impact statement evaluates the environmental impacts of the proposed action and alternatives  
23 to the proposed action. Alternatives considered include: (1) natural gas; (2) new nuclear (small  
24 modular reactor); (3) natural gas and solar combination; (4) new nuclear and solar combination;  
25 and (5) not renewing the operating license (the no-action alternative).

26 Based on the evaluation of environmental impacts in this draft supplemental environmental  
27 impact statement, the NRC staff's preliminary recommendation is that the adverse  
28 environmental impacts of subsequent license renewal for V.C. Summer are not so great that  
29 preserving the option of subsequent license renewal for energy-planning decision-makers would  
30 be unreasonable. The NRC staff based its preliminary recommendation on the following:

- 31 • the analysis and findings in NUREG-1437, *Generic Environmental Impact Statement for*  
32 *License Renewal of Nuclear Plants*
- 33 • the environmental report submitted by the applicant
- 34 • the NRC staff's consultation with Federal, State, Tribal, and local agencies
- 35 • the NRC staff's independent environmental review
- 36 • the NRC staff's consideration of public comments received during the scoping process



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## **Background**

By letter dated August 17, 2023, Dominion Energy South Carolina, Inc. (Dominion) submitted to the U.S. Nuclear Regulatory Commission (NRC) an application requesting subsequent license renewal (SLR) for the Virgil C. Summer Nuclear Station, Unit 1 (V.C. Summer) operating license (2023-TN10387). The V.C. Summer renewed facility operating license for Unit 1 (NPF-12) expires at midnight on August 6, 2042. In its application, Dominion requested a subsequent renewed operating license for a period of 20 years beyond the current renewed license expiration date, which would extend the expiration date to August 6, 2062.

Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 51.20(b)(2) (TN10253), the renewal of a power reactor operating license requires preparation of an environmental impact statement (EIS) or a supplement to an existing EIS. In addition, 10 CFR 51.95(c) (TN10253) states that, in connection with the renewal of an operating license, the NRC shall prepare an EIS, which is a supplement to the Commission’s NUREG-1437, Revision 2, *Generic Environmental Impact Statement for License Renewal of Nuclear Plants, Final Report*, dated August 2024 (LR GEIS) (NRC 2024-TN10161).

Dominion submitted an environmental report (ER) of the impacts of continued operations of V.C. Summer during the SLR period (2023-TN10387). The report addressed, on a site-specific basis, each environmental issue, including issues that were previously dispositioned as Category 1 issues in the 2013 LR GEIS (NRC 2013-TN2654). On November 3, 2023, the NRC staff published a notice of its intent to conduct a scoping process and to prepare an EIS for the V.C. Summer SLR (88 FR 75627-TN10388). In preparation for this supplemental environmental impact statement (SEIS) for V.C. Summer, the NRC staff performed the following:

- conducted two public scoping meetings: one held virtually on November 9, 2023, and one held in-person on November 14, 2023, in Blair, South Carolina
- conducted virtual and onsite audits during the weeks of May 14, 2024, and May 21, 2024
- reviewed Dominion’s ER (2023-TN10387) and identified site-specific issues that were not analyzed in the LR GEIS
- consulted with Federal, State, Tribal, and local agencies
- conducted an analysis of environmental impacts following the guidance set forth in NUREG-1555, Supplement 1, Revision 2, *Standard Review Plans for Environmental Reviews for Nuclear Power Plants: Operating License Renewal, Final Report*, dated August 2024 (NRC 2024-TN10251)
- considered public comments received during the scoping comment period

## **Proposed Federal Action**

The proposed Federal action was initiated by Dominion’s submittal of an SLR application. The current renewed V.C. Summer operating license is set to expire at midnight on August 6, 2042. The NRC’s Federal action is to determine whether to renew the V.C. Summer operating license for an additional 20 years. If the NRC renews the operating license, Dominion would be authorized to operate V.C. Summer until August 6, 2062.

1 **Purpose and Need for Action**

2 The purpose and need for the proposed Federal action (subsequent renewal of an operating  
3 license) is to provide an option that allows for power generation capability beyond the term of a  
4 current nuclear power plant operating license to meet future system generating needs. Such  
5 needs may be determined by energy-planning decision-makers, such as State regulators, utility  
6 owners, and, where authorized, Federal agencies other than the NRC. This definition of purpose  
7 and need reflects the Commission’s recognition that, absent findings in the safety review  
8 required by the Atomic Energy Act of 1954 (TN663), as amended, or in the environmental  
9 review required by the National Environmental Policy Act of 1969 (TN661), as amended, that  
10 would lead the NRC to reject a license renewal application, the NRC has no role in the energy-  
11 planning decisions of power plant owners, State regulators, system operators, and, in some  
12 cases, other Federal agencies as to whether a particular nuclear power plant should continue to  
13 operate (61 FR 28467-TN4491).

14 **Environmental Impacts of Subsequent License Renewal**

15 This SEIS evaluates the potential environmental impacts of the proposed action. The  
16 environmental impacts of the proposed action are designated as SMALL, MODERATE, or  
17 LARGE per definitions in Table B-1 in Appendix B to Subpart A of 10 CFR Part 51 (TN10253).  
18 The definitions are listed below:

- 19 • **SMALL:** Environmental effects are not detectable or are so minor that they will neither  
20 destabilize nor noticeably alter any important attribute of the resource.
- 21 • **MODERATE:** Environmental effects are sufficient to alter noticeably, but not to destabilize,  
22 important attributes of the resource.
- 23 • **LARGE:** Environmental effects are clearly noticeable and are sufficient to destabilize  
24 important attributes of the resource.

25 Resource-specific effects or impact definitions from applicable environmental laws and  
26 executive orders, other than SMALL, MODERATE, and LARGE, are used where appropriate.  
27 The LR GEIS evaluates 80 environmental issues related to plant operation and classifies each  
28 issue as either a Category 1 issue (generic to all or a distinct subset of nuclear power plants as  
29 described below), or a Category 2 issue (specific to individual power plants). Category 1 issues  
30 are those that meet all the following criteria:

- 31 • The environmental impacts associated with the issue have been determined to apply either  
32 to all plants or, for some issues, to plants having a specific type of cooling system or other  
33 specified plant or site characteristic.
- 34 • A single significance level has been assigned to the impacts (except for offsite radiological  
35 impacts of spent nuclear fuel and high-level waste disposal and offsite radiological impacts—  
36 collective impacts from other than the disposal of spent fuel and high-level waste).
- 37 • Mitigation of adverse impacts associated with the issue is considered in the analysis, and it  
38 has been determined that additional plant-specific mitigation measures are not likely to be  
39 sufficiently beneficial to warrant implementation.

40 For Category 1 issues, no additional nuclear plant-specific (i.e., plant-specific) analysis is  
41 required in this SEIS unless new and significant information is identified. Category 2 issues are  
42 plant-specific issues that do not meet one or more of the criteria for Category 1 issues;  
43 therefore, an additional plant-specific review for the non-generic issues is required, and the  
44 results are documented in this SEIS. Chapter 3 of this SEIS presents the process for identifying  
45 new and significant information.

1 On August 6, 2024, the NRC published a final rule (89 FR 64166-TN10321) revising its  
 2 environmental protection regulations in 10 CFR Part 51, “Environmental Protection Regulations  
 3 for Domestic Licensing and Related Regulatory Functions.” Specifically, the final rule updated  
 4 the potential environmental impacts associated with the renewal of an operating license for a  
 5 nuclear power plant for up to an additional 20 years, which could either be an initial license  
 6 renewal or a subsequent license renewal. The LR GEIS was also revised (NRC 2024-TN10161)  
 7 as an update to the 2013 LR GEIS (NRC 2013-TN2654) and provides the technical basis for the  
 8 final rule. The revised LR GEIS supports the updated list of environmental issues and  
 9 associated environmental impact findings contained in Table B-1 in Appendix B to Subpart A of  
 10 the revised 10 CFR Part 51 for both initial license renewals and for one period of SLR.

11 The final rule became effective 30 days after its publication in the *Federal Register* (i.e., on  
 12 September 5, 2024), and the NRC staff must now consider the new and modified issues, as  
 13 applicable, in its license renewal EISs. Accordingly, on October 1, 2024, the NRC staff noticed  
 14 its intent to prepare a site-specific supplement to the LR GEIS for the V.C. Summer SLR  
 15 application (89 FR 79975-TN10601). The SEIS will rely on the LR GEIS determinations for  
 16 Category 1 (generic) issues that apply to all or a distinct subset of nuclear power plants. Plant-  
 17 specific information will be considered only for Category 2 (plant-specific) issues and will be  
 18 screened for new and significant information on Category 1 issues.

19 Neither V.C. Summer nor the NRC identified information that is both new and significant related  
 20 to Category 1 issues that would call into question the conclusions in the LR GEIS. This  
 21 conclusion is supported by the NRC staff’s review of Dominion’s ER and other documentation  
 22 relevant to Dominion’s activities, the public scoping process, and the findings from the site  
 23 audits conducted by the NRC staff. Therefore, the NRC staff relied upon the conclusions in the  
 24 LR GEIS for all Category 1 issues applicable to V.C. Summer.

25 Table ES-1 summarizes the Category 2 issues relevant to V.C. Summer and the NRC staff’s  
 26 findings related to those issues. If the NRC staff determined that there were no Category 2  
 27 issues applicable for a particular resource area, the findings in the LR GEIS, as documented in  
 28 Appendix B to Subpart A of 10 CFR Part 51 (TN10253), are incorporated for that resource area.

29 **Table ES-1 Summary of NRC Conclusions Relating to Plant-Specific Impacts of**  
 30 **Subsequent License Renewal at Virgil C. Summer Nuclear Station, Unit 1**

Resource Area	Relevant Category 2 Issue	Impact
Surface Water Resources	Surface water use conflicts (plants with cooling ponds or cooling towers using makeup water from a river)	SMALL
Groundwater Resources	Groundwater use conflicts (plants with closed-cycle cooling systems that withdraw makeup water from a river)	SMALL
Groundwater Resources	Groundwater quality degradation (plants with cooling ponds)	SMALL
Groundwater Resources	Radionuclides released to groundwater	SMALL
Terrestrial Resources	Non-cooling system impacts on terrestrial resources	SMALL
Terrestrial Resources	Water use conflicts with terrestrial resources (plants with cooling ponds or cooling towers using makeup water from a river)	SMALL

1 **Table ES-1 Summary of NRC Conclusions Relating to Plant-Specific Impacts of**  
 2 **Subsequent License Renewal at Virgil C. Summer Nuclear Station, Unit 1**  
 3 **(Continued)**

Resource Area	Relevant Category 2 Issue	Impact
Aquatic Resources	Impingement mortality and entrainment of aquatic organisms (plants with once-through cooling systems or cooling ponds)	SMALL
Aquatic Resources	Effects of thermal effluents on aquatic organisms (plants with once-through cooling systems or cooling ponds)	SMALL
Aquatic Resources	Water use conflicts with aquatic resources (plants with cooling ponds or cooling towers using makeup water from a river)	SMALL
Federally Protected Ecological Resources	Endangered Species Act: federally listed species and critical habitats under U.S. Fish and Wildlife Service jurisdiction	May affect but is not likely to adversely affect tricolored bat and monarch butterfly
Historic and Cultural Resources	Historic and cultural resources	No adverse effect to historic properties
Human Health	Microbiological hazards to the public	SMALL
Human Health	Electromagnetic fields (EMFs) <sup>(a)</sup>	Uncategorized (Uncertain impact)
Human Health	Electric shock hazards	SMALL
Environmental Justice	Impacts on minority populations, low-income populations, and Indian Tribes	No disproportionate and adverse human health and environmental effects on minority and low-income populations
Greenhouse Gas Emissions and Climate Change	Climate change impacts on environmental resources	See Section 3.15.3 of this SEIS.
Cumulative Effects	Cumulative effects	See Section 3.16 of this SEIS.

DPS = distinct population segment; EMF = electromagnetic field.

(a) This issue was not designated as Category 1 or Category 2 and is discussed in Section 3.11.6.2 of this SEIS.

4 **Alternatives to the Proposed Action**

5 As part of its environmental review, the NRC is required to consider alternatives to SLR and  
 6 evaluate the environmental impacts associated with each alternative. These alternatives can  
 7 include other methods of power generation (i.e., replacement power alternatives), as well as not  
 8 renewing the V.C. Summer operating license (i.e., the no-action alternative).

9 The NRC staff considered 17 alternatives to the proposed action and eliminated 13 from  
 10 detailed study due to technical, resource availability, or commercial limitations that are likely to  
 11 exist when the V.C. Summer operating license expires. Four replacement power alternatives  
 12 were determined to be commercially viable:

- 13 • natural gas
- 14 • new nuclear (small modular reactor)
- 15 • natural gas and solar combination
- 16 • new nuclear and solar combination



1 These alternatives, along with the no-action alternative, are evaluated in detail in this SEIS.

2 **Preliminary Recommendation**

3 The NRC staff's preliminary recommendation is that the adverse environmental impacts of SLR  
4 for V.C. Summer are not so great that preserving the option of SLR for energy-planning  
5 decision-makers would be unreasonable. This preliminary recommendation is based on the  
6 following:

- 7 • the analysis and findings in the LR GEIS
- 8 • the ER submitted by the applicant
- 9 • the NRC staff's consultation with Federal, State, Tribal, and local agencies
- 10 • the NRC staff's independent environmental review
- 11 • the NRC staff's consideration of public comments



## ABBREVIATIONS AND ACRONYMS

1

2	ac	acre(s)
3	AD	Anno Domini
4	ADAMS	Agencywide Documents Access and Management System
5	AEA	Atomic Energy Act of 1954, as amended
6	ALARA	as low as reasonably achievable
7	APE	area of potential effect
8	AREOR	Annual Radiological Environmental Operating Report
9	AQCR	air quality control region
10		
11	BC	Before Christ
12	bgs	below ground surface
13	BMP	best management practice
14	BP	before present
15	BTA	best technology available
16		
17	CAA	Clean Air Act of 1970
18	CDF	core damage frequency
19	CEQ	Council on Environmental Quality
20	CFR	<i>Code of Federal Regulations</i>
21	cfs	cubic foot/feet per second
22	CH <sub>4</sub>	methane
23	cm	centimeter(s)
24	CO	carbon monoxide
25	CO <sub>2</sub>	carbon dioxide
26	CO <sub>2</sub> eq	CO <sub>2</sub> equivalents
27	COL	combined licenses
28	CSP	concentrating solar power
29	CWA	Clean Water Act of 1972, as amended
30	CWIS	cooling water intake system
31		
32	dB	decibel(s)
33	dBA	A-weighted decibel(s)
34	DBA	design-basis accident
35	DMR	Discharge Monitoring Report

1	DOE	U.S. Department of Energy
2	Dominion	Dominion Energy South Carolina, Inc.
3		
4	EFH	essential fish habitat
5	EIA	U.S. Energy Information Administration
6	EIS	environmental impact statement
7	ELF	extremely low frequency
8	EMF	electromagnetic field
9	EO	Executive Order
10	EPA	U.S. Environmental Protection Agency
11	EPRI	Electric Power Research Institute
12	ER	environmental report
13	ESA	Endangered Species Act of 1973, as amended
14		
15	FERC	Federal Energy Regulatory Commission
16	fps	feet (foot) per second
17	ft	foot (feet)
18	ft <sup>3</sup>	cubic foot (feet)
19	FWS	U.S. Fish and Wildlife Service
20		
21	GEIS	generic environmental impact statement
22	GHG	greenhouse gas
23	gpm	gallon(s) per minute
24	GWPP	Groundwater Protection Program
25		
26	ha	hectare(s)
27	HWC	Hazardous Waste Contingency Plan
28	Hz	hertz
29		
30	IM	impingement mortality
31	IPCC	Intergovernmental Panel on Climate Change
32	ISFSI	independent spent fuel storage installation
33		
34	km	kilometer(s)
35	kV	kilovolt(s)
36	kW	kilowatt(s)
37		

1	lb	pound(s)
2	LLRW	low-level radioactive waste
3	LR	license renewal
4	LR GEIS	<i>Generic Environmental Impact Statement for License Renewal of Nuclear</i>
5		<i>Power Plants</i>
6	LWPS	liquid waste processing system
7		
8	m	meter(s)
9	m <sup>3</sup>	cubic meter(s)
10	m <sup>3</sup> /s	cubic meter(s) per second
11	Ma	million years
12	MBTA	Migratory Bird Treaty Act
13	MCL	maximum contaminant level
14	MDCT	mechanical draft cooling tower
15	MET	meteorological evaluation tower
16	MGD	million gallons per day
17	MGM	million gallons per month
18	MGY	million gallons per year
19	MHz	megahertz
20	mi	mile(s)
21	mi <sup>2</sup>	square mile(s)
22	MSA	Magnuson–Stevens Fishery Conservation and Management Act
23	MSL	mean sea level
24	MT	metric ton(s)
25	MW	megawatt(s)
26	MWe	megawatt(s) electric
27	MWh	megawatt-hour
28	MWt	megawatt(s) thermal
29		
30	NAAQS	National Ambient Air Quality Standards
31	NEI	Nuclear Energy Institute
32	NEPA	National Environmental Policy Act of 1969
33	NGCC	natural gas-fired combined-cycle
34	NHPA	National Historic Preservation Act of 1966
35	NMFS	National Marine Fisheries Service
36	NMSA	National Marine Sanctuaries Act
37	NOAA	National Oceanic and Atmospheric Administration

1	NOV	notice of violation
2	NO <sub>x</sub>	nitrogen oxides
3	NPDES	National Pollutant Discharge Elimination System
4	NRC	U.S. Nuclear Regulatory Commission
5	NRHP	National Register of Historic Places
6		
7	ODCM	Offsite Dose Calculation Manual
8	OSHA	Occupational Safety and Health Administration
9	OWS	offsite water treatment facility
10		
11	pCi/L	picocurie(s) per liter
12	pH	potential of hydrogen
13	PM	particulate matter
14	ppb	parts per billion
15	PV	photovoltaic
16		
17	RAI	request for additional information
18	RCP	representative concentration pathway
19	rem	roentgen equivalent man
20	REMP	Radiological Environmental Monitoring Program
21	ROI	region of influence
22	ROW	right-of-way
23		
24	SAMA	severe accident mitigation alternatives
25	SC 176	South Carolina Highway 176
26	SC 213	South Carolina Highway 213
27	SC 215	South Carolina Highway 215
28	SCDAH	South Carolina Department of Archives and History
29	SCDES	South Carolina Department of Environmental Services
30	SCDHEC	South Carolina Department of Health and Environmental Control
31	SCDNR	South Carolina Department of Natural Resources
32	SCE&G	South Carolina Electric and Gas
33	SEIS	supplemental environmental impact statement
34	SER	safety evaluation report
35	SGCN	State species of greatest conservation need
36	SHPO	State Historic Preservation Officer
37	SLR	subsequent license renewal

1	SMR	small modular reactor
2	SO <sub>2</sub>	sulfur dioxide
3	SPUT	special purpose utility (permit)
4	SSC	systems, structures, and components
5	SSP	socioeconomic pathway
6	SU	standard units
7	Sv	sieverts
8	SWAP	State Wildlife Action Plan
9	SWP	service water pond
10	SWPPP	Stormwater Pollution Prevention Plan
11		
12	TEDE	total effective dose equivalent
13	TMDL	total maximum daily load
14	TRC	total residual chlorine
15	TSS	total suspended solid
16		
17	USACE	U.S. Army Corps of Engineers
18	USCB	U.S. Census Bureau
19	U.S.C.	<i>United States Code</i>
20	USGCRP	United States Global Change Research Program
21		
22	V.C. Summer	Virgil C. Summer Nuclear Station, Unit 1





# 1 INTRODUCTION AND GENERAL DISCUSSION

2 The U.S. Nuclear Regulatory Commission’s (NRC’s) environmental protection regulations in  
3 Title 10 of the *Code of Federal Regulations* (10 CFR) Part 51 (TN10253), “Environmental  
4 Protection Regulations for Domestic Licensing and Related Regulatory Functions,” implement  
5 the National Environmental Policy Act of 1969 (NEPA), as amended (42 *United States Code*  
6 [U.S.C.] 4321 et seq.; TN661). The regulations specified in 10 CFR Part 51 (TN10253) require,  
7 in part, that the NRC staff prepare an environmental impact statement (EIS) for issuance or  
8 renewal of a nuclear power plant operating license. This EIS is a supplement to the  
9 Commission’s NUREG-1437, Revision 2, *Generic Environmental Impact Statement for License  
10 Renewal of Nuclear Plants, Final Report*, dated August 2024 (LR GEIS) (NRC 2024-TN10161).

11 The Atomic Energy Act of 1954 (AEA), as amended (42 U.S.C. 2011 et seq.-TN663), specifies  
12 that licenses for commercial nuclear power reactors can be granted for up to 40 years. The  
13 initial licensing period of 40 years was based on economic and antitrust considerations rather  
14 than on technical limitations of the nuclear facility. The NRC regulations permit these licenses to  
15 be renewed beyond the initial 40-year term for an additional period of time, limited to 20-year  
16 increments per renewal. Neither the AEA nor the NRC regulations restrict the number of times a  
17 license may be renewed.

18 The decision to seek a subsequent license renewal (SLR) rests entirely with nuclear power plant  
19 owners and, typically, is based on the power plant’s economic viability and the investment  
20 necessary to continue to meet all safety and environmental requirements. The NRC makes the  
21 decision to grant or deny SLR based on whether the applicant has demonstrated reasonable  
22 assurance that it can meet the environmental and safety requirements in the agency’s  
23 regulations during the period of extended operation.

24 On March 27, 2008, South Carolina Electric & Gas Company submitted an application for  
25 10 CFR Part 52 combined licenses (COLs) for two AP1000 advanced passive pressurized water  
26 reactors for the Virgil C. Summer Nuclear Station, Units 2 and 3. Following earlier abandonment  
27 and termination of construction activities, on January 29, 2019, both owners of Virgil C. Summer  
28 Nuclear Station agreed to terminate the COLs for Units 2 and 3 (Santee Cooper 2019-TN10389)  
29 and on March 6, 2019, the COLs were terminated (NRC 2019-TN10390).

## 30 **1.1 Proposed Federal Action**

31 Dominion Energy South Carolina, Inc. (Dominion) initiated the proposed Federal action by  
32 submitting its SLR application to the NRC. The initial renewed Virgil C. Summer Nuclear Station,  
33 Unit 1 (V.C. Summer) operating license is set to expire at midnight on August 6, 2042 (License  
34 No. NPF-12). The NRC’s Federal action is to decide whether to renew the license authorizing  
35 an additional 20 years of operation.

## 36 **1.2 Purpose and Need for the Proposed Action**

37 The purpose and need for the proposed action (subsequent renewal of an operating license) is  
38 to provide an option that allows for power generation capability beyond the term of a current  
39 nuclear power plant operating license to meet future system generating needs, as such needs  
40 may be determined by energy-planning decision-makers, such as State regulators, utility  
41 owners, and, where authorized, Federal agencies other than the NRC. The definition of purpose  
42 and need reflects the Commission’s recognition that, absent findings in the safety review

1 required by the AEA or in the NEPA environmental analysis that would lead the NRC to reject a  
2 license renewal (LR) application, the NRC has no role in the energy planning decisions as to  
3 whether a nuclear power plant should continue to operate (61 FR 28467-TN4491).

### 4 **1.3 Major Environmental Review Milestones**

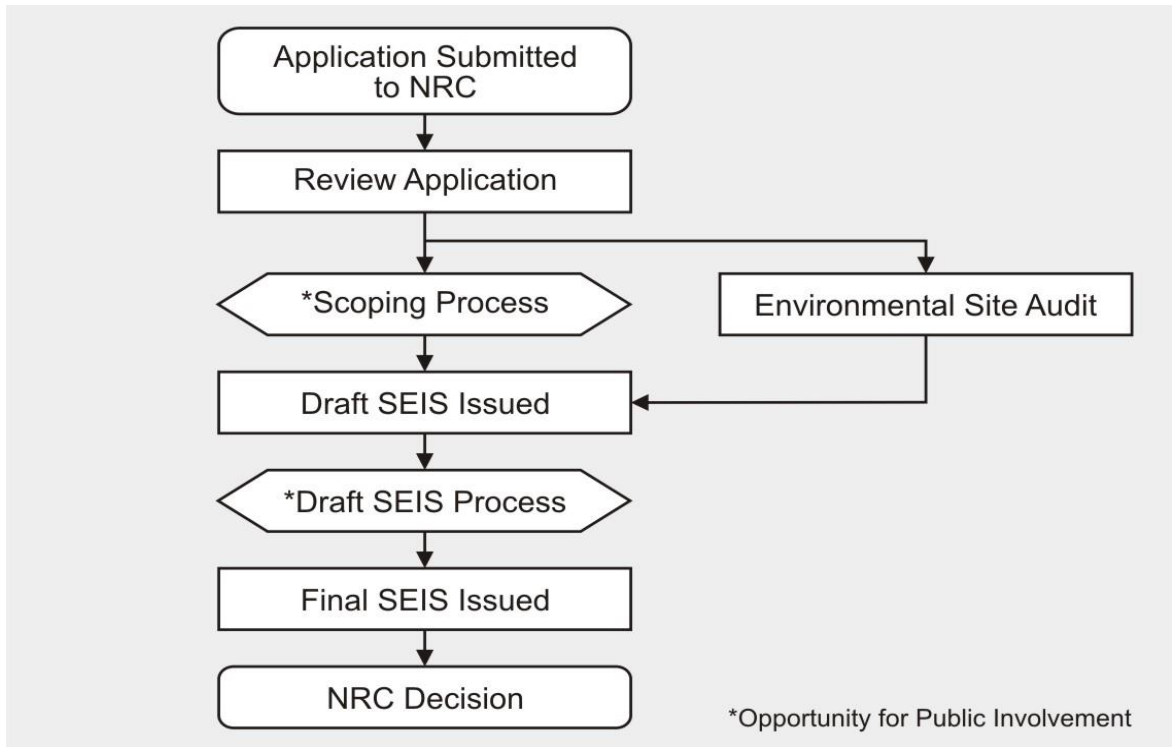
5 The NRC has established a LR review process that can be completed in a reasonable period of  
6 time with clear requirements to ensure safe nuclear power plant operation for up to an additional  
7 20 years, pursuant to 10 CFR Part 54. The safety and environmental reviews are conducted  
8 simultaneously. The findings of the safety review are documented in a safety evaluation report  
9 (SER) and the findings of the environmental review in a supplemental environmental impact  
10 statement (SEIS). The findings in the SER and SEIS are both factors in the NRC's decision to  
11 either grant or deny the renewed operating license. The SER and SEIS schedules for the V.C.  
12 Summer SLR are provided on the project website:  
13 [https://publish.nrc.gov/reactors/operating/licensing/renewal/applications/virgil-summer-](https://publish.nrc.gov/reactors/operating/licensing/renewal/applications/virgil-summer-subsequent.html)  
14 [subsequent.html](https://publish.nrc.gov/reactors/operating/licensing/renewal/applications/virgil-summer-subsequent.html)

15 By letter dated August 17, 2023, Dominion submitted an SLR application to the NRC for V.C.  
16 Summer, which included an environmental report (ER) (2023-TN10387). On October 16, 2023,  
17 after reviewing the SLR application and ER for sufficiency, the NRC staff published a notice of  
18 acceptance for docketing and opportunity to request a hearing in Volume 88 of the *Federal*  
19 *Register*, page 71384 (88 FR 71384-TN10867). On November 3, 2023, the NRC staff published  
20 a notice in the FR 88 FR 75627-TN10388) informing the public of the staff's intent to conduct an  
21 environmental scoping process, which began a 30-day scoping comment period, and to prepare  
22 an EIS.

23 The NRC staff held a virtual public scoping meeting on November 9, 2023, followed by an  
24 in-person public scoping meeting on November 14, 2023, in Blair, South Carolina. On  
25 November 8, 2024, the NRC staff issued a scoping summary report for the V.C. Summer SLR  
26 application environmental review (NRC 2024-TN10831), which included the comments received  
27 during the scoping process (Appendix A to this SEIS).

28 To independently verify information provided in the ER, the NRC staff conducted a hybrid  
29 environmental site audit related to the V.C. Summer SLR application May 2024. During the  
30 audit, the NRC staff held meetings with nuclear power plant personnel and reviewed  
31 site-specific documentation and photos. The NRC staff summarized the audit by letter dated  
32 July 5, 2024 (NRC 2024-TN10551).

33 Upon the completion of the scoping period and site audits, the NRC staff compiled its  
34 assessments and initial findings in this draft SEIS. This document is made available for public  
35 comment for 45 days. During that time, the NRC staff will host public meetings and collect public  
36 comments. Based on the information gathered, the NRC staff will amend the draft SEIS  
37 findings, as necessary, and publish a final SEIS. Figure 1-1 shows the major milestones of the  
38 NRC's LR environmental review process.



1  
2 **Figure 1-1 Environmental Review Process for Nuclear Power Plants**

3 **1.4 Major Environmental Review Milestones**

4 The NRC has established a license renewal (LR) review process that can be completed in a  
5 reasonable period of time with clear requirements to ensure safe nuclear power plant operation  
6 for up to an additional 20 years, pursuant to 10 CFR Part 54. The safety and environmental  
7 reviews are conducted simultaneously. The findings of the safety review are documented in a  
8 safety evaluation report (SER) and the findings of the environmental review in a supplemental  
9 environmental impact statement (SEIS). The findings in the SER and SEIS are both factors in  
10 the NRC's decision to either grant or deny the renewed operating license. The SER and SEIS  
11 schedules are provided on the project website:

12 [https://publish.nrc.gov/reactors/operating/licensing/renewal/applications/virgil-summer-](https://publish.nrc.gov/reactors/operating/licensing/renewal/applications/virgil-summer-subsequent.html)  
13 [subsequent.html](https://publish.nrc.gov/reactors/operating/licensing/renewal/applications/virgil-summer-subsequent.html)

14 **1.5 Generic Environmental Impact Statement**

15 To improve the efficiency of its LR review process, the NRC staff performed a generic  
16 assessment of the environmental impacts associated with LR. The LR GEIS (NRC 2024-  
17 TN10161) documents the results of the NRC's systematic approach to evaluating the  
18 environmental consequences of renewing the licenses of individual nuclear power plants and  
19 operating them for an additional 20 years. In the LR GEIS, the staff analyzed in detail and  
20 determined the impact of those environmental issues that could be resolved generically.

21 The LR GEIS establishes separate environmental issues for the NRC staff to independently  
22 evaluate in LR environmental reviews. Of these issues, the NRC staff determined that some  
23 issues are generic to all plants or a specific subset of plants (Category 1). Other issues do not  
24 lend themselves to generic consideration and are nuclear plant-specific (i.e., plant-specific)  
25 (Category 2 or uncategorized). The NRC staff evaluates these issues in a supplement to the LR

1 GEIS. Table B–1 in Appendix B to Subpart A of 10 CFR Part 51 (TN10253) provides a summary  
2 of the NRC staff’s findings for environmental issues for LR of nuclear power plants that were  
3 evaluated in the LR GEIS.

4 On August 6, 2024, the NRC published a final rule (89 FR 64166-TN10321) revising its  
5 environmental protection regulations in 10 CFR Part 51, “Environmental Protection Regulations  
6 for Domestic Licensing and Related Regulatory Functions.” Specifically, the final rule updated  
7 the potential environmental impacts associated with the renewal of an operating license for a  
8 nuclear power plant for up to an additional 20 years, which could either be an initial LR or SLR.  
9 The LR GEIS was revised (NRC 2024-TN10161) as an update to the 2013 LR GEIS (NRC  
10 2013-TN2654) and provides the technical basis for the final rule. The LR GEIS specifically  
11 supports the revised list of environmental issues and associated environmental impact findings  
12 for LR contained in Table B–1 in Appendix B to Subpart A of the revised 10 CFR Part 51. The  
13 LR GEIS and final rule reflect lessons learned, knowledge gained, and experience from LR  
14 environmental reviews performed since the development of the 2013 LR GEIS; consider  
15 changes to applicable laws and regulations; and factor in new scientific data and methodology  
16 with respect to the assessment of potential environmental impacts of a nuclear power plant LR.  
17 The LR GEIS and final rule identify 80 environmental issues (i.e., 59 Category 1, 20 Category 2,  
18 and 1 issue that remains uncategorized) that may be associated with nuclear power plant  
19 operation and refurbishment during the renewal term.

20 The final rule became effective 30 days after its publication in the *Federal Register* in August  
21 2024, and the NRC staff must now consider the new and modified issues, as applicable, in its  
22 LR SEISs. Compliance with the final rule by LR applicants is not required until 1 year from the  
23 date of publication in the *Federal Register* (i.e., LR environmental reports submitted later than  
24 1 year after publication must be compliant with the new rule).

25 For each potential environmental issue addressed in the LR GEIS, the NRC staff:

- 26 • describes the activity that affects the environment
- 27 • identifies the population or resource that is affected
- 28 • assesses the nature and magnitude of the impact on the affected population or resource
- 29 • characterizes the significance of the effect for both beneficial and adverse effects
- 30 • determines whether the results of the analysis apply to all plants
- 31 • considers whether additional mitigation measures would be warranted for impacts that  
32 would have the same significance level for all plants

33 The environmental impacts of the proposed action are designated as SMALL, MODERATE, or  
34 LARGE per definitions in Table B-1 in Appendix B to Subpart A of 10 CFR Part 51 (TN10253).  
35 The definitions of these terms are listed below.

36 **SMALL:** Environmental effects are not detectable or are so minor that they will  
37 neither destabilize nor noticeably alter any important attribute of the resource.  
38 For the purposes of assessing radiological impacts, the Commission has  
39 concluded that those impacts that do not exceed permissible levels in the  
40 Commission’s regulations are considered SMALL.

41 **MODERATE:** Environmental effects are sufficient to alter noticeably, but not to  
42 destabilize, important attributes of the resource.

1           **LARGE:** Environmental effects are clearly noticeable and are sufficient to  
2           destabilize important attributes of the resource.

3           These levels are used for describing the environmental impacts of the proposed action as well  
4           as for the impacts of a range of reasonable alternatives to the proposed action.  
5           Resource-specific effects or impact definitions from applicable environmental laws and  
6           executive orders, other than SMALL, MODERATE, and LARGE, are used where appropriate.

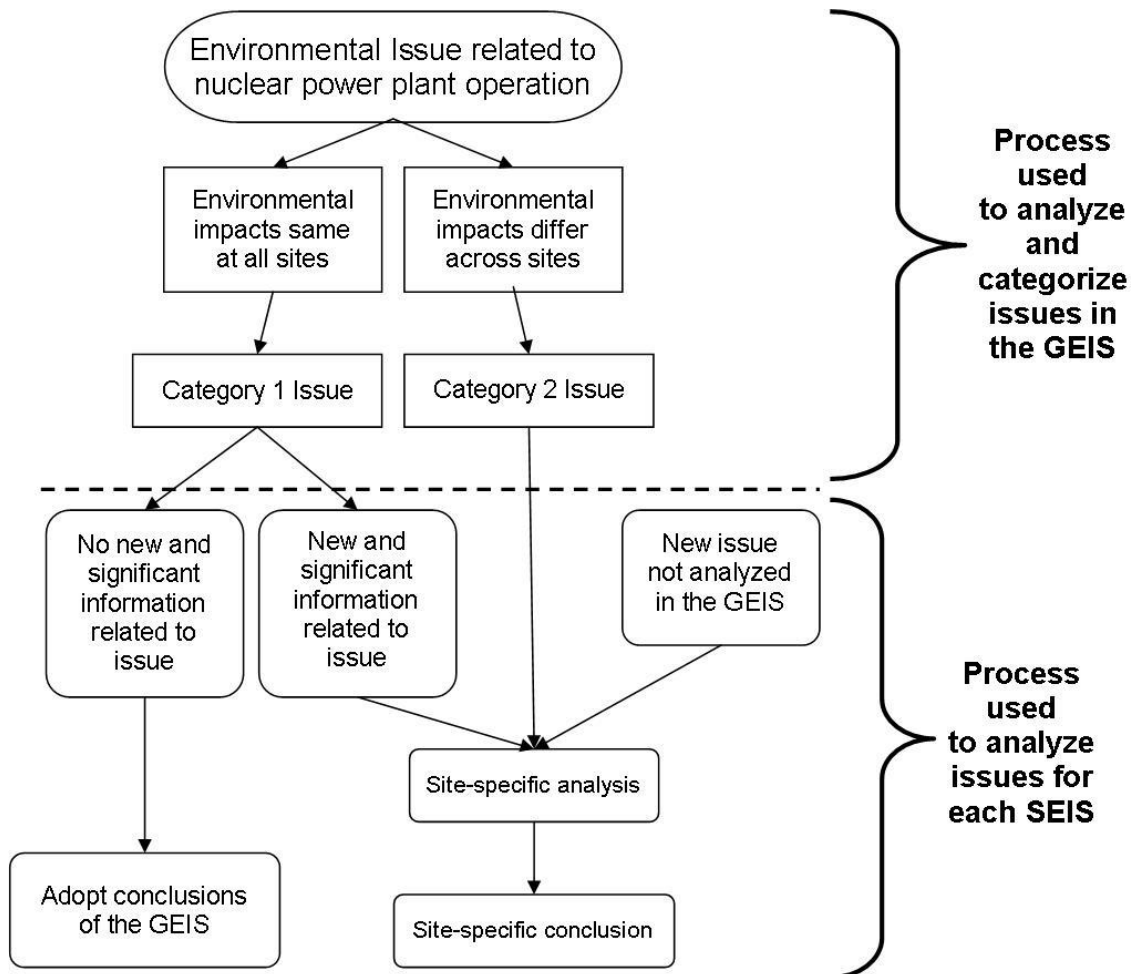
7           The LR GEIS includes a determination of whether the analysis of the environmental issue could  
8           be applied to all plants and whether additional mitigation measures would be warranted  
9           (Figure 1-2). Issues are assigned a Category 1 or Category 2 designation. As set forth in the  
10          LR GEIS, Category 1 issues are those that meet the following criteria:

- 11          • The environmental impacts associated with the issue have been determined to apply either  
12          to all nuclear power plants or, for some issues, to nuclear power plants having a specific  
13          type of cooling system or other specified plant or site characteristics.
- 14          • A single significance level (i.e., SMALL, MODERATE, or LARGE) has been assigned to the  
15          impacts (except for collective offsite radiological impacts of spent nuclear fuel and from the  
16          fuel cycle and for high-level waste and spent fuel disposal and offsite radiological impacts—  
17          collective impacts from other than the disposal of spent fuel and high-level waste).
- 18          • Mitigation of adverse impacts associated with the issue has been considered in the analysis,  
19          and it has been determined that additional plant-specific mitigation measures are not likely  
20          to be sufficiently beneficial to warrant implementation.

21          For generic issues (Category 1), no additional plant-specific analysis is required in the SEIS  
22          unless new and significant information is identified. The process for identifying new and  
23          significant information is presented in Chapter 3 of this SEIS. Plant-specific issues (Category 2)  
24          are those that do not meet one or more of the criteria of Category 1 issues; therefore, additional  
25          plant-specific review for these issues is required. The results of that plant-specific review are  
26          documented in the SEIS.

27          **New information** can be identified from many sources, including the applicant, the NRC, other  
28          agencies, or public comments. If a new issue is revealed, it is first analyzed to determine  
29          whether it is within the scope of the LR environmental evaluation. If the new issue is not  
30          addressed in the LR GEIS, the NRC staff would determine the significance of the issue and  
31          document the analysis in the SEIS.

32          **New and significant information** either identifies a significant environmental issue that was  
33          not covered in the LR GEIS, or was not considered in the analysis in the LR GEIS and leads to  
34          an impact finding that is different from the finding presented in the LR GEIS.



1  
2 The LR GEIS evaluated 80 issues. Nuclear plant-specific analysis is required for 20 of those 80 issues.

3 **Figure 1-2 Environmental Issues Evaluated for License Renewal of Nuclear Power**  
4 **Plants**

5 **1.6 Supplemental Environmental Impact Statement**

6 This SEIS presents an analysis that considers the environmental effects of the continued  
7 operation of V.C. Summer during the SLR term, alternatives to subsequent license renewal, and  
8 mitigation measures for minimizing adverse environmental impacts. Chapter 2 of this SEIS  
9 includes an analysis of reasonable alternatives. Chapter 3 of this SEIS contains analysis and  
10 comparison of the potential environmental impacts from the proposed action and alternatives to  
11 the proposed action. Chapter 4 of this SEIS presents the preliminary recommendation of the  
12 NRC staff on whether the adverse environmental impacts of SLR for V.C. Summer are so great  
13 that preserving the option of SLR would be unreasonable. The final recommendation will be  
14 made after consideration of comments received on the draft SEIS during the public comment  
15 period.

16 The NRC staff based its preliminary recommendation on:

- 17 • the analysis and findings in the LR GEIS
- 18 • the ER submitted by the applicant
- 19 • the NRC staff's consultation with Federal, State, Tribal, and local agencies

- 1 • the NRC staff's independent environmental review
- 2 • the NRC staff's consideration of public comments received from the scoping period

### 3 **1.7 Decision to Be Supported by the SEIS**

4 The decision to be supported by the SEIS is whether to renew the operating license for  
5 V.C. Summer for an additional 20 years. The regulation at 10 CFR 51.103(a)(5) (TN10253)  
6 specifies the NRC's decision standard as follows:

7 In making a final decision on a license renewal action pursuant to Part 54 of this  
8 chapter, the Commission shall determine whether or not the adverse  
9 environmental impacts of license renewal are so great that preserving the option  
10 of license renewal for energy planning decisionmakers would be unreasonable.

11 There are many factors that the NRC staff takes into consideration when deciding whether to  
12 renew the operating license of a nuclear power plant. The analysis of environmental impacts in  
13 this SEIS will provide the NRC's decision-makers (the Commission) with important  
14 environmental information for consideration in deciding whether to renew the V.C. Summer  
15 operating license.

### 16 **1.8 Cooperating Agencies**

17 During the scoping process, the NRC staff did not identify any Federal, State, Tribal, or local  
18 agencies as cooperating agencies for this SEIS.

### 19 **1.9 Consultations**

20 Certain Federal environmental statutes require Federal agencies to consult with other agencies,  
21 Tribes, and organizations before taking an action that may affect protected environmental  
22 resources, such as endangered species, habitat of managed fisheries, and historical and  
23 cultural resources. The Endangered Species Act of 1973, as amended (ESA) (16 U.S.C. 1531  
24 et seq. [TN1010]); the Magnuson–Stevens Fishery Conservation and Management Act of 1976,  
25 as amended (16 U.S.C. 1801 et seq. [TN9966]); and the National Historic Preservation Act of  
26 1966, as amended (16 U.S.C. 470 et seq. [TN4157]), require Federal agencies to consult  
27 with applicable State and Federal agencies and groups before taking an action that may  
28 affect endangered species, fisheries, or historic and archaeological resources, respectively.  
29 Appendix C to this SEIS contains a list of the agencies and groups with which the NRC staff  
30 consulted.

### 31 **1.10 Correspondence**

32 During the course of the environmental review, the NRC staff corresponded with the applicant,  
33 as listed in Appendix D to this SEIS

### 34 **1.11 Status of Compliance**

35 Dominion is responsible for complying with all NRC regulations and other applicable Federal,  
36 State, and local requirements. Appendix F to the LR GEIS, "Laws, Regulations, and Other  
37 Requirements," describes some of the major applicable Federal statutes (NRC 2024-TN10161).  
38 Numerous permits and licenses are issued by Federal, State, and local authorities for activities  
39 at V.C. Summer. Appendix B to this SEIS contains further information regarding Dominion's  
40 status of compliance.

1 **1.12 Related State and Federal Activities**

2 The NRC staff reviewed the possibility that activities (projects) of other Federal agencies might  
3 impact the renewal of the operating license for V.C. Summer. Any such activities could result in  
4 cumulative environmental impacts and the possible need for the Federal agency to become a  
5 cooperating agency for preparing this SEIS. The NRC staff has determined that there are no  
6 Federal projects that would make it necessary for another Federal agency to become a  
7 cooperating agency in the preparation of this SEIS (10 CFR 51.10(b)(2) [TN10253]). Projects  
8 and actions considered in the cumulative impacts analysis are provided in Section 3.16 of this  
9 SEIS.

10 The NRC is required under Section 102(2)(C) of NEPA (TN661) to consult with and obtain  
11 comments from any Federal agency that has jurisdiction by law or special expertise with respect  
12 to any environmental impact involved in the subject matter of the EISs. For example, during the  
13 preparation of this SEIS, the NRC consulted with the South Carolina Office of Historic  
14 Preservation, among others. Appendix C to this SEIS provides a list of key consultation  
15 correspondence.



## 2 ALTERNATIVES INCLUDING THE PROPOSED ACTION

Although the NRC’s decision-making authority in SLR is limited to deciding whether to renew a nuclear power plant’s operating license, the agency’s implementation of NEPA (42 U.S.C. 4321 et seq.-TN661) requires consideration of the environmental impacts of that action, as well as the impacts of reasonable alternatives to renewing a nuclear power plant’s operating license. Although the ultimate decision about which alternative (or proposed action) to implement falls on the operator, State, or other non-NRC Federal officials, comparing the impacts of renewing the operating license to the environmental impacts of alternatives allows the NRC to determine whether the environmental impacts of an SLR are so great that preserving the option of an SLR for energy-planning decision-makers would be unreasonable (10 CFR 51.95(c)(4)) (TN10253).

Energy-planning decision-makers and power plant owners ultimately decide whether the nuclear power plant will continue to operate, and economic and environmental considerations play roles in this decision. In general, the NRC’s responsibility is to ensure the safe operation of nuclear power facilities, not to formulate energy policy or promote nuclear power, or encourage or discourage the development of alternative power generation. The NRC does not engage in energy-planning decisions, and it makes no judgment as to which replacement power alternatives would be the most likely alternative selected in any given case.

This chapter of the SEIS describes (1) the V.C. Summer site and its operation, (2) the proposed action (subsequent renewal of the V.C. Summer operating license), (3) reasonable alternatives to the proposed action (including the no-action alternative), and (4) alternatives eliminated from detailed study.

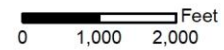
### **2.1 Description of Nuclear Power Plant Facility and Operation**

V.C. Summer is located on the southern shore of the Monticello Reservoir in Fairfield County, South Carolina (Figure 2-1). The V.C. Summer site is approximately 3 miles (mi) (4.8 kilometers [km]) northwest of Jenkinsville, the nearest community, and 14 mi (22.5 km) southwest of the county seat of Winnsboro (Figure 2-2). The nearest population center and State capital is Columbia, South Carolina, which is located approximately 26 mi (41.8 km) southeast of V.C. Summer (Figure 2-3). The V.C. Summer site occupies approximately 2,200 acres (ac) (890 hectares [ha]) and includes southern portions of the Monticello Reservoir and the Fairfield Pumped Storage Facility.

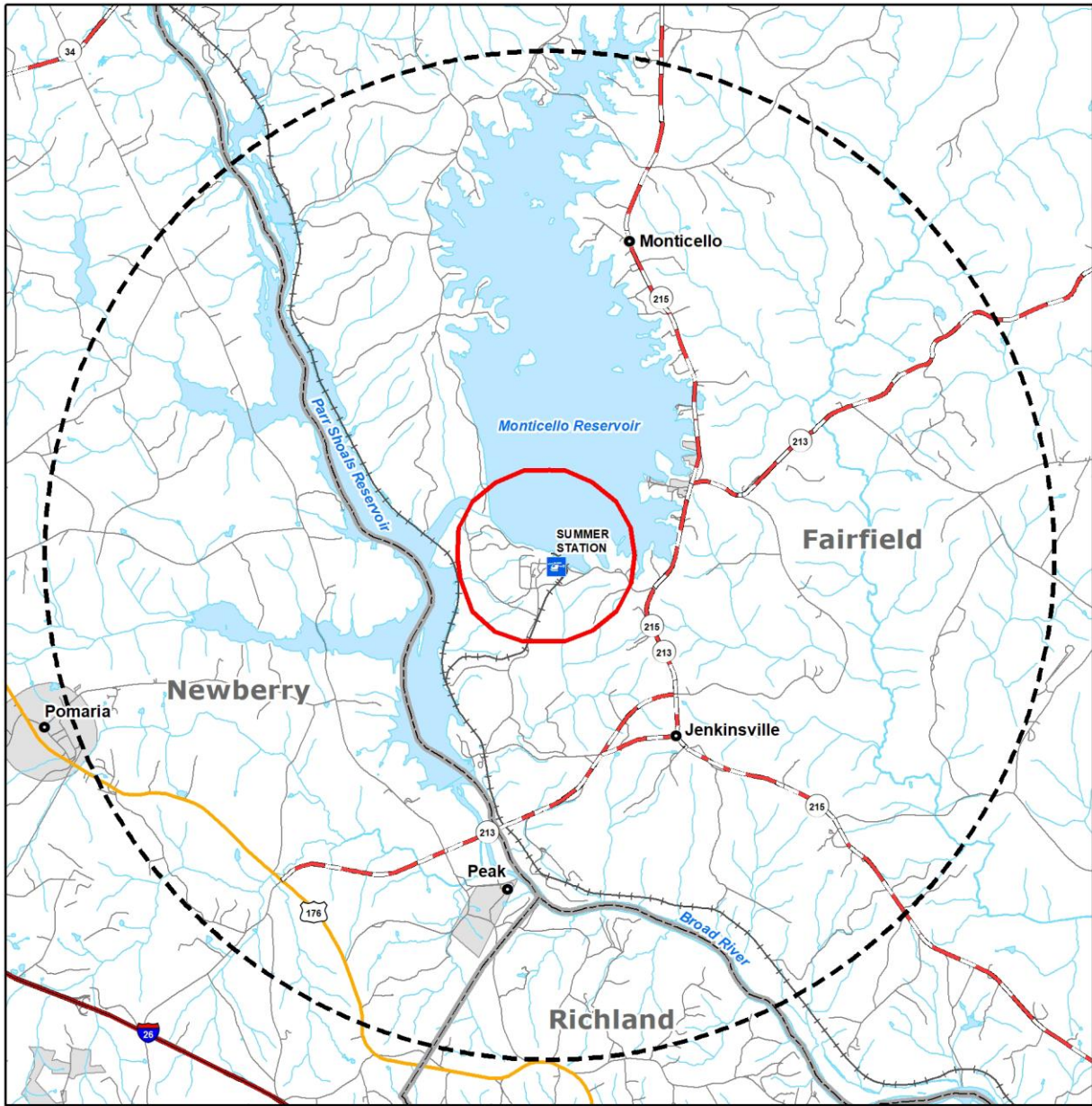
The principal structures at V.C. Summer are the nuclear island structures within the protected area fence (i.e., the Reactor Building, Auxiliary Building, Fuel Handling Building, Intermediate Building, Control Building, Service Building, Turbine Building, Diesel Generator Building, independent spent fuel storage installation [ISFSI], Service Water Intake Structure, and Circulating Water Intake Structure) and the potable water supply (e.g., Offsite Water Supply) (Dominion 2023-TN10387).



- Legend**
- - - Protected Area Fence
  - ++ Railroad
  - Building/Structure
  - Site Boundary/Exclusion Area Boundary



1  
2 **Figure 2-1 Virgil C. Summer Nuclear Station Plant Layout. Source: Dominion 2023-**  
3 **TN10387.**



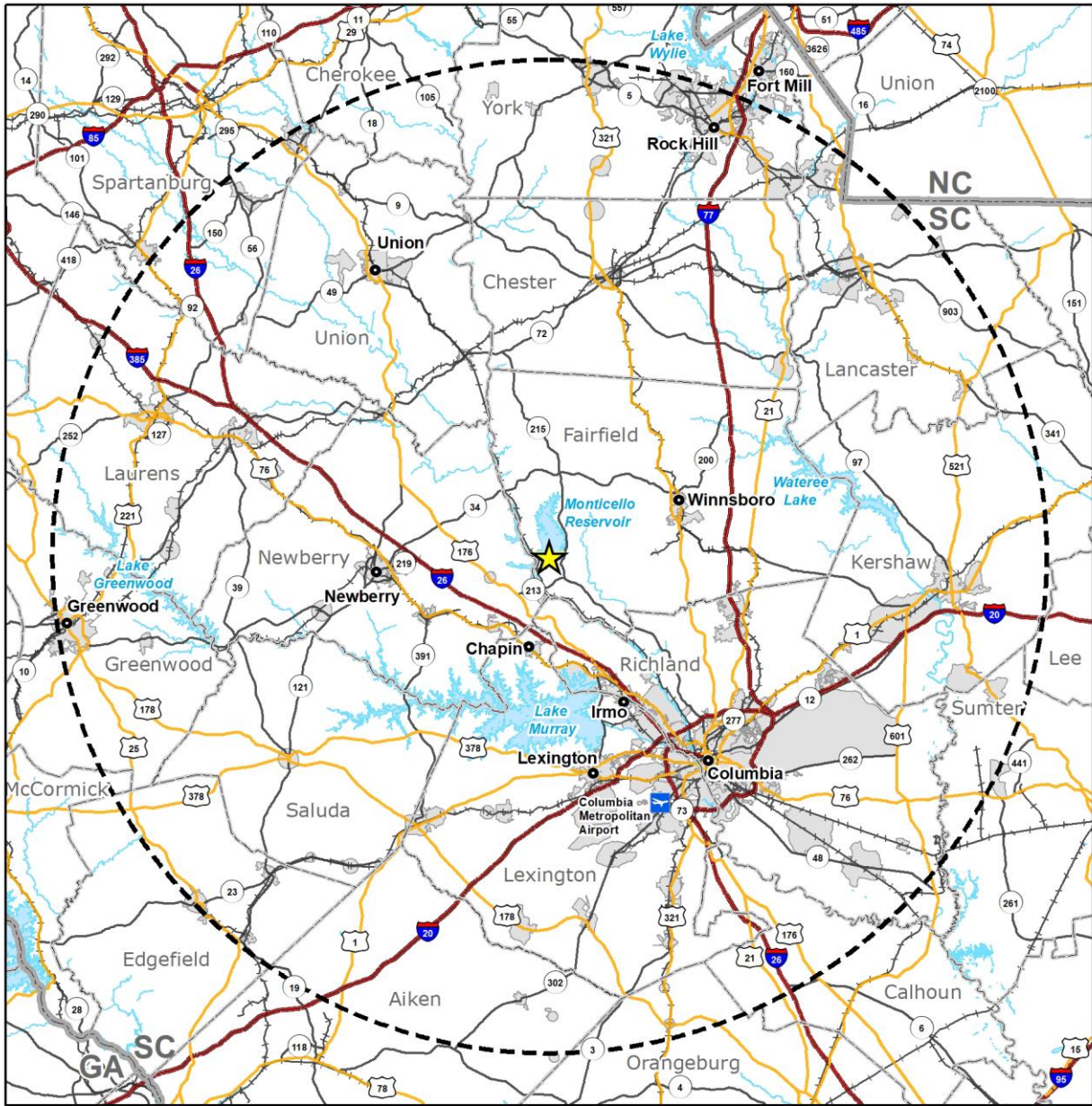
**Legend**

- Community
- Interstate
- U.S. Route
- State Highway
- Local Road
- ++ Railroad
- ✈ Heliport
- ☁ Surface Water
- ▭ VCSNS Site Boundary
- ⊞ 6-Mile Radius
- ▭ County
- ▭ Place



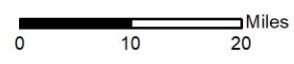
1  
2  
3

**Figure 2-2 Virgil C. Summer Nuclear Station 6 mi (10 km) Radius Map.**  
**Source: Dominion 2023-TN10387.**



**Legend**

- ★ VCSNS
- Community
- ✈ Airport
- ☪ Surface Water
- ⬜ 50-Mile Radius
- Interstate
- U.S. Route
- State Highway
- +++ Railroad
- ▭ Place
- ▭ County
- ▭ State



1  
2  
3

**Figure 2-3 Virgil C. Summer Nuclear Station 50 mi (80 km) Radius Map.**  
**Source: Dominion 2023-TN10387.**

1    **2.1.1 External Appearance and Setting**

2    The domed reactor building is the tallest structure at V.C. Summer. It is surrounded by the  
3    auxiliary buildings, control building, turbine building, and diesel generator building. There are  
4    facilities for fuel handling and related support shops, warehouses, and storage. Service water  
5    pond dams extend into Monticello Reservoir to the east, as do the discharge bay and canal. The  
6    intake structure is located north of the station. A wastewater treatment area and the substation  
7    are located to the south. The Fairfield Pumped Storage Facility is about ½ mi (0.8 km) to the  
8    west. The entire nuclear station and support facilities are not easily visible from adjacent  
9    communities because of the topography and forested cover. The station can be viewed from  
10   South Carolina Highway 215 (SC 215) and lands along the eastern shore of Monticello  
11   Reservoir.

12   **2.1.2 Reactor and Containment Systems**

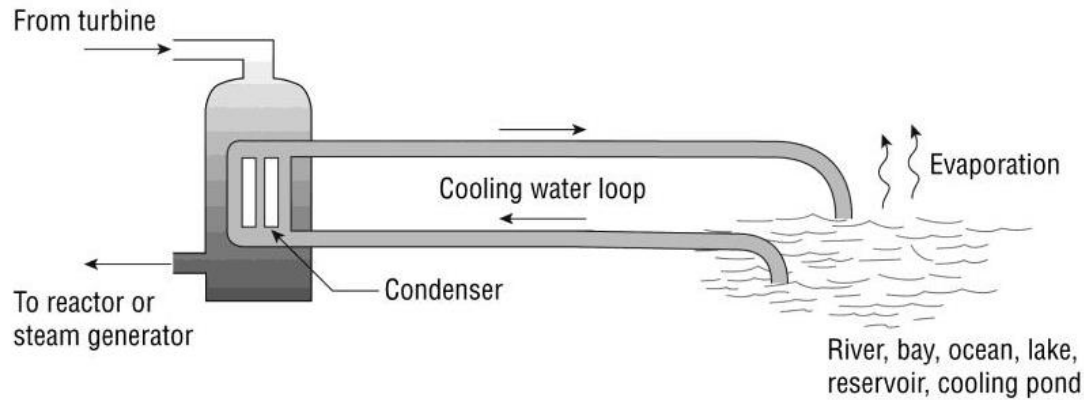
13   V.C. Summer is a single-unit plant with a domed concrete containment building. The station  
14   includes a pressurized light-water reactor nuclear steam supply system designed and furnished  
15   by Westinghouse Electric Company and a turbine generator manufactured by General Electric  
16   Corporation. The unit was designed for an output of 2,775 megawatts thermal (MWt) with  
17   corresponding net electrical output of approximately 900 megawatts electric (MWe). It achieved  
18   initial criticality in October 1982 and began commercial operation in January 1983 (Dominion  
19   2023-TN10387).

20   In 1996, then-operator South Carolina Electric and Gas (SCE&G) sought approval from the  
21   NRC to upgrade performance to a core power output of 2900 MWt with a net electrical output of  
22   945 MWe. In August 1997, instrument changes improving measurement accuracy resulted in a  
23   9 megawatt (MW) increase in indicated electrical power output, to 954 MWe. In the spring of  
24   1999, a more efficient high-pressure turbine rotor increased the net electrical output to  
25   966 MWe (Dominion 2023-TN10387).

26   **2.1.3 Cooling and Auxiliary Water Systems**

27   Section 2.1.3 of NUREG-1437, Supplement 15, *Generic Environmental Impact Statement for*  
28   *License Renewal of Nuclear Plants: Regarding Virgil C. Summer Nuclear Station*, describes the  
29   operation of the nuclear power plant’s cooling and auxiliary water systems, including the  
30   withdrawal of water from the Monticello Reservoir and the return flow of heated water to the  
31   reservoir (NRC 2004-TN7262). Section E2.2.3 of Dominion’s ER, submitted as part of its SLR  
32   application, provides an expanded description of V.C. Summer’s cooling and auxiliary water  
33   systems, including the circulating water system, turbine building closed-cycle cooling water  
34   system, service water system and ultimate heat sink, component cooling water system,  
35   demineralized water makeup system, condensate storage facilities, and fire protection and  
36   domestic water supply systems (Dominion 2023-TN10387). The NRC staff incorporates this  
37   information here by reference and summarizes key information in the following subsections  
38   (Dominion 2023-TN10387).

39   V.C. Summer operates as a once-through cooling plant that withdraws from, and discharges to,  
40   a cooling pond, Monticello Reservoir. Monticello Reservoir was built to supply cooling water to  
41   the station and to provide an upper reservoir for the Fairfield Pumped Storage Facility located  
42   on Parr Reservoir.



1  
 2 **Figure 2-4 Schematic Diagram of Once-Through Cooling Water System with Reservoir**  
 3 **Water in a Nuclear Power Plant. Source: LR GEIS (NRC 2024-TN10161).**

4 *2.1.3.1 Cooling Water Intake and Discharge*

5 The main cooling system at V.C. Summer is the circulating water system. It is designed to  
 6 remove  $6.67 \times 10^9$  British thermal units per hour ( $1.95 \times 10^3$  MWh) of heat from the main and  
 7 auxiliary condensers, as well as from the turbine auxiliaries. Cooling water is drawn from the  
 8 plant's cooling pond, Monticello Reservoir, at a rate of approximately 769 million gallons per day  
 9 ( $1,190$  cubic feet per second [cfs]), passed through the condensers once, and ultimately  
 10 returned to Monticello Reservoir. The intake structure, located along the south shoreline of the  
 11 Reservoir, has three pump bays, each with two entrances. Each entrance is 13 feet wide and  
 12 25.5 feet high, extending from the bottom of the Pump House to the bottom of the skimmer wall.  
 13 The entrances are each equipped with vertical traveling screens (mesh size  $0.4 \times 3.5$  inches)  
 14 and two sets of trash racks of conventional design (Dominion 2023-TN10387).

15 *2.1.3.2 Turbine Building Closed-Cycle Cooling Water System*

16 The Turbine Building closed-cycle cooling water system provides cooling water to components  
 17 associated with the steam and power conversion system. The source of water is Monticello  
 18 Reservoir via the raw water system. System components include a wet surface industrial  
 19 cooling tower, two 100-percent-capacity tower spray pumps, four cooling tower fans, two  
 20 100-percent-capacity closed-cycle cooling pumps, two 100-percent-capacity closed-cycle  
 21 cooling booster pumps, various equipment coolers, and a head tank. Chemical injection and  
 22 blowdown are provided to maintain the quality of the spray water. The blowdown is directed to  
 23 the Monticello Reservoir through the circulating water discharge canal. Under normal operation,  
 24 one of the two cooling water pumps circulates treated water through the cooling tower coils,  
 25 transferring the heat removed from the various components to the spray water, and then to the  
 26 atmosphere by evaporation of the spray water in the air stream produced by cooling tower fans  
 27 (Dominion 2023-TN10387).

28 *2.1.3.3 Potable and Sanitary Water Systems*

29 V.C. Summer pumps and treats raw water from the Monticello Reservoir at the offsite water  
 30 treatment facility (OWS), producing both potable water for use at V.C. Summer, and filter  
 31 process water for Unit 1 which is not connected to a municipal system. The OWS is located on  
 32 site along the plant's access road. The facility has separate treatment trains for the potable  
 33 water supply and filter process water but shares the same raw water intake and pumping

1 system and waste stream discharge system. Treatment processes for sanitary water are by  
2 flocculation and ultrafiltration. Treatment for the potable water consists of pretreatment by  
3 flocculation, followed by ultrafiltration and reverse osmosis membranes, and then  
4 remineralization and potential of hydrogen (pH) control treatment. The process water handling  
5 and disposal is through gravity in a retention basin with the supernatant discharged to  
6 Monticello Reservoir, and the accumulated solids in the basin are sent offsite for disposal, as  
7 necessary. Discharges are made back to Monticello Reservoir at the OWS Discharge located  
8 approximately 600 feet north of the OWS under National Pollutant Discharge Elimination  
9 System (NPDES) General Permit for Water Treatment Plant Dischargers, SCG646000  
10 (Dominion 2023-TN10387).

#### 11 2.1.3.4 *Fire Protection System*

12 The water for portions of V.C. Summer's fire protection system is supplied by an underground  
13 yard fire main loop installed around V.C. Summer. The supply source of the water in the system  
14 is the Monticello Reservoir. The fire service piping is separate from most domestic and sanitary  
15 water service piping so that the fire main loop is independent from these other water services  
16 and does not impact, and is not impacted, by these other systems. The 100-percent-capacity  
17 electric fire pump, or 100-percent-capacity diesel engine driven fire pump, is designed to  
18 provide sufficient flow and pressure to the largest fire protection system demand plus  
19 1,000 gallons per minute (gpm) for hose streams for some areas of V.C. Summer (Dominion  
20 2023-TN10387).

#### 21 **2.1.4 Radioactive Waste Management Systems**

22 The NRC licenses nuclear power plants with the expectation that they will release a limited  
23 amount of radioactive material to both the air and water during normal operations.

24 V.C. Summer uses liquid, gaseous, and solid waste processing systems to collect and treat,  
25 as needed, radioactive materials produced as a byproduct of nuclear power plant operations.  
26 Section E2.2.6 of the Dominion ER, submitted as part of its SLR application, provides an  
27 expanded description of V.C. Summer's radioactive waste management systems (2023-  
28 TN10387: Appendix E, Section E2.2.6, E-2-15 to E-2-22). The NRC staff discusses the  
29 radioactive waste management systems in Section 3.13.1 of this SEIS.

#### 30 **2.1.5 Nonradioactive Waste Management Systems**

31 V.C. Summer generates nonradioactive waste as a result of nuclear power plant maintenance,  
32 cleaning, and operational processes. V.C. Summer manages nonradioactive wastes in  
33 accordance with applicable Federal and State regulations, as implemented through its corporate  
34 procedures. Section E2.2.7 of the Dominion ER, submitted as part of its SLR application,  
35 provides an expanded description of V.C. Summer's nonradioactive waste management  
36 systems (2023-TN10387: Appendix E, Section E2.2.7, p. E-2-22). The NRC staff discusses the  
37 nonradioactive waste management systems in Section 3.13.2 of this SEIS.

#### 38 **2.1.6 Utility and Transportation Infrastructure**

39 The utility and transportation infrastructure at nuclear power plants typically interfaces with  
40 public infrastructure systems available in the region. Such infrastructure includes utilities, such  
41 as suppliers of electricity, fuel, and water, as well as roads and railroads that provide access to  
42 the site. The following sections briefly describe the existing utility and transportation

1 infrastructure at V.C. Summer. Plant-specific information in this section is primarily derived from  
2 Dominion's ER (2023-TN10387), unless otherwise cited.

3 *2.1.6.1 Electricity*

4 Nuclear power plants generate electricity for other users; however, they also use electricity to  
5 operate. Offsite power sources provide power to engineered safety features and emergency  
6 equipment in the event of a malfunction or interruption of power generation at the nuclear power  
7 plant. Planned independent backup power sources provide power, if power from both the  
8 nuclear power plant itself and offsite power sources is interrupted.

9 *2.1.6.2 Fuel*

10 V.C. Summer utilizes low-enriched uranium dioxide fuel with enrichments below 5 percent by  
11 weight of uranium-235, with peak fuel-rod burn-up levels less than 62,000 megawatt-days per  
12 metric ton of uranium. The reactor is refueled on an 18-month cycle with approximately  
13 30 percent of the fuel being replaced during each refueling outage. V.C. Summer stores spent  
14 fuel in the spent fuel pool located in the reactor building, or in dry cask storage containers at the  
15 onsite ISFSI (Dominion 2023-TN10387).

16 *2.1.6.3 Water*

17 Surface water withdrawn from Monticello Reservoir is the sole source of water for V.C. Summer  
18 operations. In this SEIS, Section 2.1.3 describes the V.C. Summer industrial water systems.

19 *2.1.6.4 Transportation Systems*

20 Nuclear power plants are served by controlled access roads that are connected to U.S.  
21 highways and Interstate highways. In addition to roads, many nuclear power plants also have  
22 railroad connections for moving heavy equipment and other materials. Nuclear power plants  
23 located on navigable waters may have facilities to receive and ship loads on barges.  
24 Section 3.10.6 of this SEIS describes the V.C. Summer transportation systems.

25 *2.1.6.5 Power Transmission Systems*

26 For LR actions, the NRC staff evaluates, as part of the proposed action, the continued operation  
27 of those power transmission lines that connect to the substation where it feeds electricity into  
28 the regional power distribution system. The transmission lines that are in scope for the  
29 V.C. Summer SLR environmental review include the lines from the Turbine Building to the  
30 230 kilovolt (kV) switchyard, as well as a 115 kV line that extends to the Parr Generating  
31 Complex. The area between the Turbine Building and the 230 kV switchyard is within the site's  
32 exclusion area, as shown in Figure E2.2-1 of the ER (Dominion 2023-TN10387 and Dominion  
33 2024-TN10391), and is therefore, not publicly accessible. The Parr 115 kV transmission corridor  
34 continues past the site boundary of the V.C. Summer plant site. This transmission corridor  
35 access is controlled by Dominion, so although it is outside the site boundary, it is not accessible  
36 to the public (Dominion 2024-TN10391). The NRC staff also considers, as part of the proposed  
37 action, environmental impacts from the continued operation of the transmission lines that supply  
38 outside power to the nuclear plant from the grid. Section 3.11.4 of this SEIS describes these  
39 transmission lines.



1 **2.1.7 Nuclear Power Plant Operations and Maintenance**

2 Maintenance activities conducted at V.C. Summer include inspection, testing, and surveillance  
3 to maintain the current licensing basis of the facility and to ensure compliance with  
4 environmental and safety requirements (Dominion 2023-TN10387). These activities include  
5 in-service inspections of safety-related structures, systems, and components; quality assurance  
6 and fire protection programs; and radioactive and nonradioactive water chemistry monitoring.

7 Dominion implements additional programs to meet technical specification surveillance  
8 requirements and in response to NRC generic communications. Such additional programs  
9 include various periodic maintenance, testing, and inspection procedures necessary to manage  
10 the effects of aging on structures and components. Certain program activities are performed  
11 during the operation of the units, whereas others are performed during scheduled refueling  
12 outages (Dominion 2023-TN10387).

13 **2.2 Proposed Action**

14 As stated in Section 1.1 of this SEIS, the NRC’s Federal action is to determine whether to renew  
15 the V.C. Summer operating license for an additional 20 years. Section 2.2.1 of this SEIS  
16 describes normal nuclear power plant operations during the SLR term.

17 **2.2.1 Nuclear Power Plant Operations during the Subsequent License Renewal Term**

18 Nuclear power plant operation activities during the SLR term would be the same as, or similar  
19 to, those occurring during the current license term. Section 2.1 of this SEIS describes the  
20 general types of activities carried out during nuclear power plant operations. These include the  
21 following:

- 22 • reactor operation
- 23 • waste management
- 24 • cooling water intake and discharge
- 25 • nuclear fuel receipt and storage
- 26 • spent fuel storage security
- 27 • office and clerical work; possible laboratory analysis
- 28 • surveillance, monitoring, and maintenance
- 29 • refueling and other outages

30 As part of its SLR application, Dominion submitted an ER stating that V.C. Summer will continue  
31 to operate during the SLR term in the same manner as it would during the current license term  
32 except for additional aging management programs, as necessary (2023-TN10387). Such  
33 programs would address structure and component aging in accordance with 10 CFR Part 54  
34 (TN4878), “Requirements for Renewal of Operating Licenses for Nuclear Power Plants.”

35 **2.2.2 Refurbishment and Other Activities Associated with Subsequent License**  
36 **Renewal**

37 Refurbishment activities include replacement and repair of major structures, systems, and  
38 components. Most major refurbishment activities are actions that would typically take place only  
39 once in the life of a nuclear power plant, if at all. Refurbishment activities may have an impact  
40 on the environment beyond those that occur during normal operations and may require  
41 evaluation, depending on the type of action and the nuclear power plant-specific design.

1 In preparation for its SLR application, Dominion evaluated major structures, systems, and  
2 components in accordance with 10 CFR 54.21 (TN4878), “Contents of Application—Technical  
3 Information,” to identify major refurbishment activities necessary for the continued operation of  
4 V.C. Summer during the proposed 20-year period of extended operation (2023-TN10387).  
5 Dominion did not identify any major refurbishment or replacement activities necessary for the  
6 continued operation of V.C. Summer beyond the end of the current renewed operating license  
7 period (2023-TN10387).

### 8 **2.2.3 Termination of Nuclear Power Plant Operations and Decommissioning after the** 9 **License Renewal Term**

10 NUREG-0586, Supplement 1, Volumes 1 and 2, *Final Generic Environmental Impact Statement*  
11 *on Decommissioning of Nuclear Facilities: Regarding the Decommissioning of Nuclear Power*  
12 *Reactors* (the decommissioning GEIS) (NRC 2002-TN665), describes the environmental  
13 impacts of decommissioning. The majority of nuclear power plant operation activities would  
14 cease with reactor shutdown. Some activities (e.g., security and oversight of spent nuclear fuel)  
15 would remain unchanged, whereas others (e.g., waste management, administrative work,  
16 laboratory analysis, surveillance, monitoring, and maintenance) would continue at reduced or  
17 altered levels. Systems dedicated to reactor operations would cease. However, if these systems  
18 are not removed from the site after reactor shutdown, their physical presence may continue to  
19 impact the environment. Impacts associated with dedicated systems that remain in place, or  
20 with shared systems that continue to operate at normal capacities, could remain unchanged.

21 Decommissioning will occur whether V.C. Summer is shut down at the end of its current  
22 renewed operating license or at the end of a SLR period of extended operation 20 years later.

## 23 **2.3 Alternatives**

24 As stated above, NEPA requires the NRC to consider reasonable alternatives to the proposed  
25 action of renewing the V.C. Summer operating license. For a replacement power alternative to  
26 be considered reasonable, it must be either (1) commercially viable on a utility scale and  
27 operational before the reactor’s operating license expires, or (2) expected to become  
28 commercially viable on a utility scale and operational before the reactor’s operating license  
29 expires.

30 The first alternative to the proposed action of renewing the V.C. Summer operating license is for  
31 the NRC to not renew the license. This is called the no-action alternative and is described in  
32 Section 2.3.1 of this SEIS. In addition to the no-action alternative, this section identifies four  
33 reasonable replacement power alternatives for detailed study. As described in Section 2.3.2 of  
34 this SEIS, these alternatives would seek to replace V.C. Summer’s generating capacity by  
35 meeting the region’s energy needs through other means or sources.

### 36 **2.3.1 No-Action Alternative**

37 At some point, all operating nuclear power plants will permanently cease operations and  
38 undergo decommissioning. Under the no-action alternative, the NRC would not renew the  
39 V.C. Summer operating license, and the reactor unit would be shut down on or before the  
40 expiration of the current renewed license. The LR GEIS (NRC 2024-TN10161) describes the  
41 environmental impacts that arise directly from permanent plant shutdown. The NRC staff  
42 expects the impacts to be relatively similar, whether they occur at the end of the current

1 renewed license term (i.e., after 60 years of operation) or at the end of a subsequent renewed  
2 license term (i.e., after 80 or more years of operation).

3 After permanent reactor shutdown, nuclear power plant operators will initiate decommissioning  
4 in accordance with 10 CFR 50.82, "Termination of License" (TN249). The decommissioning  
5 GEIS (NUREG-0586) (NRC 2002-TN665) describes the environmental impacts from  
6 decommissioning a nuclear power plant and related activities. The analysis in the  
7 decommissioning GEIS bounds the environmental impacts of decommissioning when Dominion  
8 terminates reactor operations at V.C. Summer. A licensee in decommissioning must assess in  
9 its post-shutdown decommissioning activities report submitted to the NRC, whether there are  
10 planned decommissioning activities with reasonably foreseeable environmental impacts that are  
11 not bounded in previous EISs. Section 2.2.3 of this SEIS describes the incremental  
12 environmental impacts of SLR on decommissioning activities.

13 Termination of reactor operations would result in the total cessation of electrical power  
14 production at V.C. Summer. Unlike the replacement power alternatives described in  
15 Section 2.3.2 of this SEIS, the no-action alternative does not meet the purpose and need of the  
16 proposed action, as described in Section 2.3.1, because the no-action alternative does not  
17 provide a means of delivering baseload power to meet future electric system needs. Assuming  
18 that a need currently exists for the electrical power generated by V.C. Summer, the no-action  
19 alternative would likely create a need for replacement power.

## 20 **2.3.2 Replacement Power Alternatives**

21 The following sections describe replacement power alternatives. The potential environmental  
22 impacts of these alternatives are described in Chapter 3 of this SEIS. Although the NRC's  
23 authority only extends to deciding whether to renew the V.C. Summer operating license,  
24 replacement power alternatives represent possible options that energy-planning decision-  
25 makers may need to consider if the V.C. Summer operating license is not renewed.

26 In evaluating alternatives, the NRC considered energy-generating technologies in commercial  
27 operation, as well as technologies likely to be commercially available by the time the current  
28 V.C. Summer renewed operating license expires. Because energy-generating technologies  
29 continually evolve in capability and cost, and because regulatory structures change to either  
30 promote or impede the development of certain technologies, this evaluation considered which  
31 replacement power alternatives would be available and commercially viable when the  
32 V.C. Summer current renewed operating license expires.

33 The Dominion ER describes possible replacement power alternatives. In addition, information  
34 from the following sources were considered in the replacement power analysis:

- 35 • U.S. Department of Energy (DOE), U.S. Energy Information Administration (EIA)
- 36 • other DOE offices
- 37 • U.S. Environmental Protection Agency (EPA)
- 38 • other Federal agency and national laboratory publications
- 39 • industry sources and publications

1 In total, the NRC staff considered 17 replacement power alternatives to the proposed agency  
2 action and eliminated 13 of these from the detailed study, leaving four replacement power  
3 alternatives. The four replacement power alternatives and 13 eliminated alternatives include the  
4 following:

5 • Alternatives to the proposed agency action:

- 6 – natural gas
- 7 – new nuclear (small modular reactor)
- 8 – natural gas and solar combination
- 9 – new nuclear and solar combination

10 • Alternatives eliminated from detailed study:

- 11 – solar power
- 12 – wind power
- 13 – biomass power
- 14 – hydroelectric power
- 15 – geothermal power
- 16 – ocean wave, current, and tide energy
- 17 – municipal solid waste-fired power
- 18 – petroleum-fired power
- 19 – coal-fired power
- 20 – fuel cells
- 21 – purchased power
- 22 – delayed retirement of other power-producing facilities
- 23 – demand-side management/energy conservation/energy efficiency

24 Section 2.4 briefly describes the 13 alternatives eliminated from detailed study and provides the  
25 basis for each elimination. Section 2.5 of this SEIS summarizes the key characteristics of the  
26 replacement power alternatives. The NRC assigns a significance level of SMALL, MODERATE,  
27 or LARGE for most plant-specific issues. For ecological resources subject to the ESA (16  
28 U.S.C. 1531 et seq.-TN1010) and the Magnuson–Stevens Fishery Conservation and  
29 Management Act of 1976, as amended (16 U.S.C. 1801 et seq.-TN9966), and for historic and  
30 cultural resources subject to the National Historic Preservation Act of 1966, as amended  
31 (NHPA) (54 U.S.C. 300101 et seq.-TN4157), the impact significance determination language is  
32 specific to the authorizing legislation. The order in which this SEIS presents the different  
33 alternatives does not imply increasing or decreasing level of impact, nor does the order imply  
34 that an energy planning decision-maker would be more (or less) likely to select any given  
35 alternative.

36 *2.3.2.1 Natural Gas*

37 The proposed natural gas alternative would involve the construction and operation of a  
38 standalone natural gas-fired combined-cycle (NGCC) power plant, comprised of multiple  
39 combustion turbines, a heat recovery steam generator, and a steam turbine generator. A design  
40 capacity of 1,110 MWe (gross) of electricity generation would be needed to replace the  
41 966 MWe of power currently generated by V.C. Summer, based on a natural gas capacity factor  
42 of 87 percent (EIA 2022-TN10537). The standalone NGCC power plant would have closed-  
43 cycle cooling using mechanical draft cooling tower (MDCTs).

44 The NGCC plant would require approximately 50 ac (20 ha) at the abandoned V.C. Summer  
45 Units 2 and 3 project site. Existing transmission infrastructure would be used, including an  
46 existing onsite natural gas transmission pipeline.

1 2.3.2.2 *New Nuclear Alternative (Small Modular Reactor)*

2 The applicant proposed a new nuclear alternative that would involve the installation and  
3 operation of two multiunit NuScale small modular reactor (SMR) designs yielding up to  
4 1,768 MWe. Because each NuScale SMR generates approximately 884 MWe, two SMRs would  
5 be needed to replace the 966 MWe of power currently generated by V.C. Summer. The SMR  
6 plants would have closed-cycle cooling using MDCTs.

7 The SMRs would require approximately 130 ac (50 ha) at the abandoned V.C. Summer Units 2  
8 and 3 project site. Existing transmission infrastructure would be used.

9 2.3.2.3 *Natural Gas and Solar Combination Alternative*

10 The applicant proposed natural gas and solar combination alternative would involve the  
11 construction and operation of all the following structures:

- 12 • a 700 MWe (gross) NGCC plant at the abandoned V.C. Summer Units 2 and 3 project site
- 13 • 60 megawatt (MW) solar installation with battery storage at V.C. Summer Units 2 and 3  
14 project site
- 15 • Three 100-MW solar installations with battery storage located offsite in South Carolina

16 The NGCC power plant would require approximately 50 ac (20 ha) and the onsite solar  
17 installation would require over 500 ac (approximately 200 ha) at the abandoned V.C. Summer  
18 Units 2 and 3 project site. Existing transmission infrastructure would be used, including an  
19 existing onsite natural gas transmission pipeline.

20 Offsite solar installations would require approximately 3,200 ac (1,300 ha), and up to 25 mi  
21 (40 km) of new 345 kV transmission lines would be needed to support each offsite solar  
22 installation, impacting approximately 1,400 ac (600 ha) of land.

23 2.3.2.4 *New Nuclear and Solar Combination Alternative*

24 The new nuclear and solar combination proposed alternative would involve the installation and  
25 operation of a single multiunit NuScale SMR design yielding up to 884 MWe, requiring less than  
26 the approximately 130 ac (50 ha) needed for the standalone SMR alternative at the abandoned  
27 V.C. Summer Units 2 and 3 project site. The SMR plant would have closed-cycle cooling system  
28 using MDCTs. In addition, an 82-MW solar installation with battery storage would require  
29 approximately 700 ac (280 ha) at the V.C. Summer Units 2 and 3 site.

30 **2.4 Alternatives Considered but Eliminated from Detailed Review**

31 The NRC staff eliminated 13 alternatives from detailed study due to resource availability and  
32 commercial or regulatory limitations. Many of these limitations will likely still exist when  
33 the current renewed V.C. Summer operating license expires. This section briefly describes  
34 these 13 alternatives as well as the reasons why they were eliminated from detailed study.

35 **2.4.1 Solar Power**

36 Solar power, including photovoltaic and concentrating solar power technologies, generates  
37 power from sunlight. Solar photovoltaic components convert sunlight directly into electricity  
38 using solar cells made from silicon or cadmium telluride. Concentrating solar power uses heat

1 from the sun to boil water and produce steam. Steam drives a turbine connected to a generator  
2 to produce electricity (NREL Undated-TN10852).

3 Solar generators are considered an intermittent electrical power resource because their  
4 availability depends on exposure to the sun, also known as solar insolation. Further, to be  
5 viable, a utility-scale solar power alternative must replace the amount of electrical power that  
6 V.C. Summer currently provides. Assuming a capacity factor of 25 percent (DOE/EIA 2023-  
7 TN8821), approximately 3,864 MW of additional solar energy capacity would be needed to  
8 replace the 966 MW of electricity generated by V.C. Summer. Approximately 34,000 ac  
9 (13,759 ha) of land may be needed to house solar power installations using Dominion's  
10 estimate of 8.9 ac (3.6 ha) of land per megawatt.

11 It is unlikely that V.C. Summer's generating capacity could be replaced by a single type of  
12 intermittent electricity generation, including a non-baseload resource such as utility-scale solar.  
13 However, a combination of energy sources, including sources analyzed in Section 2.3.2 of this  
14 SEIS, could complement each other and reduce issues such as the intermittency of utility-scale  
15 solar.

16 Alternatives that include utility-scale solar power in combination with other energy generating  
17 technologies are described in Sections 2.3.2 of this SEIS and analyzed in detail in Chapter 3.  
18 The types of impacts of a standalone solar energy alternative would be similar to the  
19 combination alternative, although the magnitude of such impacts may differ based on the  
20 amount of solar energy capacity to be constructed. A standalone baseload solar power  
21 alternative was considered but eliminated from detailed analysis because of the intermittency of  
22 solar power and its inability to provide reliable baseload power. However, a limited amount of  
23 solar power generation, in combination with other energy generating technologies, could be a  
24 reasonable alternative to V.C. Summer's SLR, as explained in Section 2.3.2 of this SEIS.

#### 25 **2.4.2 Wind Power**

26 As is the case with other renewable energy sources, the feasibility of wind energy providing  
27 baseload power depends on the location (relative to electricity users), value, accessibility, and  
28 constancy of the resource. Wind energy must be converted to electricity at or near the point  
29 where it is used, and there are limited energy storage opportunities available to overcome the  
30 intermittency and variability of wind resources.

31 The American Clean Power Association reports a total of more than 122,000 MW of installed  
32 wind energy capacity nationwide as of December 31, 2020 (NREL Undated-TN10853). To be  
33 considered a reasonable replacement power alternative to V.C. Summer's SLR, a wind power  
34 alternative must replace the amount of electrical power that V.C. Summer provides. Assuming a  
35 capacity factor of 41.4 percent for onshore wind facilities (DOE 2021-TN9562), land-based wind  
36 energy facilities would need to generate approximately 2,333 MW of electricity to replace  
37 966 MWe of V.C. Summer's generating capacity. Using DOE metrics of 0.74 ac/MW for  
38 permanent structures, 2.47 ac/MW for construction footprint, and 85 ac/MW for wind farm  
39 boundaries, onshore wind farms could require over 200,000 ac (80,937 ha) of land (DOE 2015-  
40 TN8757). Additionally, because wind is an intermittent energy source, energy storage would be  
41 needed, increasing land requirements.

42 Furthermore, South Carolina does not have substantial onshore wind energy resources. While  
43 offshore wind potential exists, no installed utility-scale wind generating capacity currently exists  
44 (DOE/EIA 2024-TN10525), nor is it reasonably foreseeable that any such wind resources will be  
45 installed. A wind energy alternative is not a reasonable alternative to V.C. Summer's SLR, and  
46 was eliminated from detailed analysis both as a standalone baseload power alternative and as

1 part of a combination alternative because it is an intermittent energy source and because there  
2 is no current or reasonably foreseeable future capacity for wind to generate baseload power.

### 3 **2.4.3 Biomass Power**

4 Biomass resources used for biomass fuel-fired power generation include agricultural residues,  
5 animal manure, wood wastes from forestry and industry, residues from food and paper  
6 industries, municipal green wastes, dedicated energy crops, and methane from landfills (IEA  
7 2007-TN8436). Using biomass fuel-fired generation for baseload power depends on the  
8 geographic distribution, available quantities, constancy of supply, and energy content of  
9 biomass resources. For this analysis, biomass fuel would be combusted for power generation  
10 in the electricity sector.

11 As of 2022, biomass in South Carolina powered approximately 2 percent of total State  
12 electricity, most of that from wood and wood waste (DOE/EIA 2024-TN10525). For utility-scale  
13 biomass fuel-fired electricity generation, technologies used for biomass energy conversion  
14 would be similar to the technology used in fossil fuel-fired power plants, including the direct  
15 combustion of biomass fuel in a boiler to produce steam (NRC 2024-TN10161). Accordingly,  
16 biomass generation is considered a carbon-emitting technology.

17 Biomass energy generation is generally more cost-effective when co-located with coal-fired  
18 power plants (IEA 2007-TN8436). However, most biomass fuel-fired power plants generally  
19 only reach capacities of 50 MWe, which means that replacing V.C. Summer's generating  
20 capacity, using only biomass fuel, would require the construction of 19 new power plants, which  
21 is unlikely to occur in the foreseeable future.

22 Biomass fuel-fired generation is not a reasonable alternative to V.C. Summer SLR because  
23 there is no current or reasonably foreseeable future capacity for biomass fuel to generate  
24 baseload power.

### 25 **2.4.4 Hydroelectric Power**

26 As of 2020, there were approximately 2,300 operating hydroelectric facilities operate in the  
27 United States (DOE Undated-TN7701). Hydropower technologies capture the energy of flowing  
28 water and direct it to turbines and generators to produce electricity (NRC 2024-TN10161). There  
29 are three variants of hydroelectric power generation: (1) run of the river (diversion) facilities that  
30 redirect the natural flow of a river, stream, or canal through a hydroelectric power facility;  
31 (2) store and release facilities that block the flow of the river by using dams that cause water to  
32 accumulate in an upstream reservoir; and (3) pumped storage facilities that use electricity from  
33 other power sources to pump water to higher elevations during off-peak hours to be released  
34 during peak load periods to generate additional electricity (DOE Undated-TN10854).

35 Although the EIA projects that hydropower will remain a leading source of renewable power  
36 generation in the United States through 2040, there is little expected growth in large-scale  
37 hydropower capacity (DOE/EIA 2013-TN2590). The potential construction of large new  
38 hydropower facilities has diminished because of public concern over flooding, habitat alteration  
39 and loss, and the impact on natural rivers (NRC 2024-TN10161).

40 Given the projected lack of growth in hydroelectric power, the competing demands for water  
41 resources, and public opposition to the environmental impacts from the construction of large  
42 hydroelectric power facilities, hydroelectric power is not a reasonable alternative to  
43 V.C. Summer SLR.

1 **2.4.5 Geothermal Power**

2 Geothermal energy generating technologies extract heat from geologic formations to produce  
3 steam to drive steam turbine generators. Electricity production from geothermal energy has  
4 demonstrated 95 percent or greater capacity factors, making geothermal energy a potential  
5 source of baseload electric power. However, the feasibility of geothermal power generation to  
6 provide baseload power depends on the regional quality and accessibility of geothermal  
7 resources. Utility-scale power generation requires geothermal reservoirs with a temperature  
8 above 200°F (93°C). Such utility-scale geothermal resources are concentrated in the western  
9 United States, specifically in Alaska, Arizona, California, Colorado, Hawaii, Idaho, Montana,  
10 Nevada, New Mexico, Oregon, Utah, Washington, and Wyoming, and most assessments of  
11 geothermal power generation resources have been conducted in these States (DOE Undated-  
12 TN7698; USGS 2008-TN7697). There is currently no utility-scale geothermal power production  
13 in the V.C. Summer region. Given its low potential, geothermal power generation is not a  
14 reasonable alternative to V.C. Summer SLR.

15 **2.4.6 Wave and Ocean Energy**

16 Ocean waves, currents, and tides are generally predictable and reliable, making them attractive  
17 candidates for potential renewable energy generation. Four major technologies can be used to  
18 harness wave energy: (1) terminator devices that range from 500 kilowatts (kW) to 2 MW,  
19 (2) attenuators, (3) point absorbers, and (4) overtopping devices (BOEM Undated-TN7696).  
20 Point absorbers and attenuators use floating buoys to convert wave motion into mechanical  
21 energy, driving generators to produce electricity. Overtopping devices trap a portion of a wave  
22 at a higher elevation than the sea surface; waves enter a tube and compress air that is then  
23 used to drive a generator producing electricity (NRC 2024-TN10161). Some of these  
24 technologies are undergoing demonstration testing at commercial scales, but none are currently  
25 used to provide baseload power (BOEM Undated-TN7696). In the United States, there are  
26 currently several projects licensed or seeking permits, the largest of which is 20 MW (Duke  
27 Energy 2021-TN8897).

28 While South Carolina borders the Atlantic Ocean, application of wave energy technologies  
29 would likely not be viable, as wave and ocean energy-generation technologies are still in their  
30 infancy and currently lack commercial application (EPRI 2011-TN8442). Therefore, wave and  
31 ocean energy power generation is not a reasonable alternative to V.C. Summer SLR, either as a  
32 stand-alone alternative or as part of a combination alternative.

33 **2.4.7 Municipal Solid Waste-Fired Power**

34 Energy recovery from municipal solid waste converts nonrecyclable waste materials into usable  
35 heat, electricity, or fuel through combustion. The three types of municipal solid waste  
36 combustion technologies are: (1) mass burning, (2) modular systems, and (3) refuse derived  
37 fuel systems. Mass burning is the method used most frequently in the United States. The heat  
38 released from combustion is used to convert water to steam, which is then used to drive turbine  
39 generators to produce electricity. Ash is then collected and taken to a landfill, and particulates  
40 are captured through a filtering system (EPA 2023-TN8443).

41 Currently, 75 waste-to-energy power plants are in operation in 21 states, processing  
42 approximately 29 million tons (26,308 kg) of waste per year. These waste-to-energy power  
43 plants have an aggregate capacity of 2,725 MWe (Michaels and Krishnan 2019-TN7700).  
44 Although some power plants have expanded to handle additional waste a to produce more



1 energy, only one new municipal solid waste combustion power plant has been built in the United  
2 States since 1995 (Maize 2019-TN7699). The average waste-to-energy power plant produces  
3 about 50 MWe, which is a very small fraction of the energy produced by V.C. Summer.

4 The decision to burn municipal solid waste to generate electricity is usually driven by the  
5 need for a waste disposal alternative to landfills, rather than a need to generate energy.  
6 Stable supplies of municipal solid waste would be needed to support new waste-to-energy  
7 power plants in the region; such supplies are not currently available. Based on this information,  
8 municipal solid waste-fired power is not a reasonable alternative to V.C. Summer SLR.

#### 9 **2.4.8 Petroleum-Fired Power**

10 The variable costs and environmental impacts of petroleum-fired electrical power generation  
11 tend to be greater than those of natural gas-fired generation. The historically higher cost of oil  
12 has also resulted in a steady decline in its use for electricity generation, and the EIA forecasts  
13 no growth in capacity using petroleum-fired power plants through 2040 (DOE/EIA 2015-  
14 TN4585). Based on this information, petroleum-fired electricity generation is not a reasonable  
15 alternative to V.C. Summer SLR.

#### 16 **2.4.9 Coal-Fired Power**

17 Although coal has historically been the largest source of electricity in the United States, both  
18 natural gas generation and nuclear energy generation surpassed coal generation at the national  
19 level in 2020. Coal-fired electricity generation in the United States has decreased and is  
20 expected to continue to decrease as coal-fired units retire or are converted to use other fuels as  
21 the remaining units are used less often (DOE/EIA 2021-TN7718).

22 Baseload coal-fired power units have proven their reliability and can routinely sustain capacity  
23 factors as high as 85 percent. Among the available technologies, pulverized-coal boilers  
24 producing supercritical steam (supercritical pulverized-coal boilers) have become increasingly  
25 common, given their generally high thermal efficiencies and overall reliability.

26 Supercritical pulverized-coal facilities are more expensive to build than subcritical coal-fired  
27 power plants but consume less fuel per unit output. Integrated gasification combined cycle  
28 combines modern coal gasification technology with both gas turbine and steam turbine power  
29 generation. The technology is cleaner than conventional pulverized-coal plants because some  
30 of the major pollutants are removed before combustion. Although several smaller, integrated  
31 gasification combined-cycle power plants have been in operation since the mid-1990s, large  
32 scale projects have experienced setbacks, and public opposition has hindered it from being fully  
33 integrated into the energy market.

34 On average, siting and constructing a 1,000 MW coal plant may require 500 ac (202.3 ha) of  
35 land cover, with potentially substantial short- and long-term ecological and cultural impacts.  
36 Construction activities associated with a coal facility can result in considerable dust emissions  
37 along with sedimentation and erosion. During operation, coal facilities emit higher amounts of  
38 nitrogen oxides (NO<sub>x</sub>), carbon dioxide (CO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), heavy metals, and particulate  
39 matter (PM) than do other fuel sources, leading to public health risks such as chronic  
40 obstructive pulmonary disease, asthma, lung cancer, and respiratory infection. The mining of  
41 the coal itself requires large amounts of land, as does the disposal of solid waste, especially fly  
42 ash and scrubber sludge (NRC 2024-TN10848). Based on these considerations, coal-fired  
43 power is not a reasonable alternative to V.C. Summer SLR.

1 **2.4.10 Fuel Cells**

2 Fuel cells oxidize fuels without combustion and, therefore, without the environmental side  
3 effects of combustion. Fuel cells use a fuel (e.g., hydrogen) and oxygen to create electricity  
4 through an electrochemical process. The only byproducts are heat, water, and CO<sub>2</sub> (depending  
5 on the hydrogen fuel type) (DOE Undated-TN7695). Hydrogen fuel can come from a variety of  
6 hydrocarbon resources, including natural gas. As of October 2020, the United States had only  
7 250 MW of fuel cell power generation capacity (CEA 2022-TN10547).

8 Currently, fuel cells are not economically or technologically competitive with other electricity  
9 generating alternatives. The EIA estimates that fuel cells may cost \$6,639 per installed kilowatt  
10 (total overnight capital costs in 2021 dollars), which is high compared to other replacement  
11 power alternatives (DOE/EIA 2022-TN7694). In June 2021, DOE launched an initiative to  
12 reduce the cost of hydrogen production to spur fuel cell and energy storage development over  
13 the next decade (DOE 2021-TN7693). However, it is unclear whether or to what degree this  
14 initiative will lead to increased future development and deployment of fuel cell technologies.

15 More importantly, fuel cell units used for power production are likely to be small (approximately  
16 10 MW). The world's largest industrial hydrogen fuel cell power plant is a 50 MWe plant in South  
17 Korea (Larson 2020-TN8401). Using fuel cells to replace the power that V.C. Summer provides  
18 would require the construction of approximately 97 units. Given the limited deployment and high  
19 cost of fuel cell technology, fuel cells are not a reasonable alternative to V.C. Summer SLR.

20 **2.4.11 Purchased Power**

21 Power may be purchased and imported from outside the region. Although purchased power  
22 would have no new impact, environmental impacts could be occurring where electricity is  
23 generated, depending on the technology used to generate the power.

24 Importing power can be economically adverse, because the cost of electric power generation is  
25 generally less than the cost of purchasing power from a third-party supplier (NRC 2024-  
26 TN10161). Purchased power agreements carry the inherent risk that a supplier may not be able  
27 to deliver all of the contracted power. Purchased power is not a reasonable alternative to  
28 V.C. Summer SLR, therefore, due to its higher cost and lower reliability.

29 **2.4.12 Delayed Retirement of Other Generating Facilities**

30 Delaying the retirement of a power generating facility provides for the continued supply of  
31 electricity. Due to new regulations requiring significant reductions in power plant emissions,  
32 some power generating facility owners may opt to retire their older, less efficient units rather  
33 than incur the cost for compliance. Retirements also may be driven by low competing  
34 commodity prices (such as low natural gas prices), slow growth in electricity demand, and EPA  
35 Mercury and Air Toxics Standards for fossil-fueled power plants (DOE/EIA 2015-TN4585; EPA  
36 2020-TN8379), making delayed retirements less likely to be realized. Because of these  
37 conditions, delayed retirement of older power generating units is not a reasonable alternative to  
38 V.C. Summer SLR.

39 **2.4.13 Demand-Side Management**

40 Demand-side management refers to energy conservation and efficiency programs that do not  
41 require the addition of new generating capacity. Demand-side management programs can

1 include reducing energy demand through consumer behavioral changes or through altering the  
2 characteristics of the electrical load. These programs can be initiated by a utility, transmission  
3 operators, the State, or other load serving entities. In general, residential electricity consumers  
4 have been responsible for the majority of peak load reductions, and participation in most  
5 demand-side management programs is voluntary (NRC 2024-TN10161).

6 The existence of a demand-side management program does not guarantee that reductions in  
7 electricity demand will occur. The LR GEIS concludes that, although the energy conservation or  
8 energy efficiency potential in the United States is substantial, there have been no cases in  
9 which an energy efficiency or conservation program alone has been implemented expressly to  
10 replace or offset a large baseload generation station (NRC 2024-TN10161); generally, the NRC  
11 staff has concluded that the analysis of a need for a new generating facility has already  
12 accounted for any savings from demand-side management programs (NRC 2024-TN10848).  
13 Therefore, baseload demand-side management programs alone are not a reasonable  
14 alternative to V.C. Summer SLR. However, in combination with other power generating  
15 technologies, demand-side management could be a reasonable alternative to V.C. Summer's  
16 SLR. While the replacement power alternatives discussed in Section 2.3.2 do not explicitly  
17 include consideration of demand-side management, such programs could help to reduce the  
18 size and/or capacity of the energy sources considered in these alternatives. However, without  
19 being able to quantify the size of demand-side management programs, the impacts of such  
20 programs can only be addressed qualitatively; as such, demand-side management is not further  
21 discussed in the replacement power alternatives carried forward for detailed analysis.

## 22 **2.5 Comparison of Alternatives**

23 This section presents a comparison of the environmental impacts of the following five  
24 alternatives to the proposed action (V.C. Summer SLR): (1) the no-action alternative; (2) natural  
25 gas; (3) new nuclear (small modular reactor); (4) natural gas and solar combination; and (5) new  
26 nuclear and solar combination. Chapter 3 describes the environmental impacts of the proposed  
27 action and the alternatives. Table 2-1 summarizes the environmental impacts of the proposed  
28 action (V.C. Summer SLR), and the alternatives to SLR considered in this SEIS.

29 The environmental impacts of the proposed action (i.e., V.C. Summer SLR) would be SMALL for  
30 all impact categories. In comparison, the four replacement power alternatives have 10 identified  
31 environmental impacts that are greater than the impacts from the proposed action. In addition,  
32 replacement power alternatives would result in construction impacts. If the NRC does not renew  
33 the V.C. Summer operating license (i.e., the no-action alternative), energy-planning decision-  
34 makers would have to choose a replacement power alternative similar to the ones evaluated in  
35 this SEIS. Based on the review of the reasonable replacement power alternatives, the no-action  
36 alternative, and the proposed action, the NRC staff concludes that the environmentally preferred  
37 alternative is the proposed SLR action. Therefore, the NRC staff's preliminary recommendation  
38 is that the V.C. Summer operating license be renewed for the SLR period of extended  
39 operation.

1 **Table 2-1 Summary of Environmental Impacts of the Proposed Action and Alternatives**

<b>Impact Area (Resource)</b>	<b>V.C. Summer Subsequent License Renewal (Proposed Action)</b>	<b>No-Action Alternative</b>	<b>Natural Gas Alternative</b>	<b>New Nuclear (Small Modular Reactor) Alternative</b>	<b>Natural Gas and Solar Combination Alternative</b>	<b>New Nuclear and Solar Combination Alternative</b>
Land Use	SMALL	SMALL	SMALL	SMALL	MODERATE TO LARGE	SMALL TO MODERATE
Visual Resources	SMALL	SMALL	SMALL	SMALL	SMALL	SMALL TO MODERATE
Air Quality	SMALL	SMALL	MODERATE	SMALL	SMALL TO MODERATE	SMALL
Noise	SMALL	SMALL	SMALL	SMALL	SMALL TO MODERATE	SMALL
Geologic Environment	SMALL	SMALL	SMALL	SMALL TO MODERATE	SMALL	SMALL TO MODERATE
Surface Water Resources	SMALL	SMALL	SMALL	SMALL TO MODERATE	SMALL	SMALL
Groundwater Resources	SMALL	SMALL	SMALL	SMALL	SMALL	SMALL
Terrestrial Resources	SMALL	SMALL	SMALL	SMALL	MODERATE TO LARGE	SMALL TO MODERATE
Aquatic Resources	SMALL	SMALL	SMALL	SMALL TO MODERATE	SMALL TO MODERATE	SMALL TO MODERATE
Federally Protected Ecological Resources	SEE NOTE <sup>(a)</sup>	SEE NOTE <sup>(b)</sup>	SEE NOTE <sup>(c)</sup>	SEE NOTE <sup>(c)</sup>	SEE NOTE <sup>(c)</sup>	SEE NOTE <sup>(c)</sup>
Historic and Cultural Resources	SEE NOTE <sup>(d)</sup>	SEE NOTE <sup>(e)</sup>	SEE NOTE <sup>(f)</sup>	SEE NOTE <sup>(f)</sup>	SEE NOTE <sup>(f)</sup>	SEE NOTE <sup>(f)</sup>
Socioeconomics	SMALL	MODERATE TO LARGE	SMALL TO LARGE	SMALL TO LARGE	SMALL TO MODERATE	SMALL TO LARGE
Transportation	SMALL	SMALL	SMALL TO LARGE	SMALL TO LARGE	SMALL TO MODERATE	SMALL TO LARGE
Human Health	SMALL <sup>(g)</sup>	SMALL <sup>(g)</sup>	SMALL <sup>(g)</sup>	SMALL <sup>(g)</sup>	SMALL <sup>(g)</sup>	SMALL <sup>(g)</sup>
Environmental Justice	SEE NOTE <sup>(h)</sup>	SEE NOTE <sup>(h)</sup>	SEE NOTE <sup>(h)</sup>	SEE NOTE <sup>(h)</sup>	SEE NOTE <sup>(h)</sup>	SEE NOTE <sup>(h)</sup>
Waste Management and Pollution Prevention	SMALL <sup>(i)</sup>	SMALL <sup>(i)</sup>	SMALL	SMALL	SMALL	SMALL

1 **Table 2-1 Summary of Environmental Impacts of the Proposed Action and Alternatives**  
 2 **(Continued)**

<b>Impact Area (Resource)</b>	<b>V.C. Summer Subsequent License Renewal (Proposed Action)</b>	<b>No-Action Alternative</b>	<b>Natural Gas Alternative</b>	<b>New Nuclear (Small Modular Reactor) Alternative</b>	<b>Natural Gas and Solar Combination Alternative</b>	<b>New Nuclear and Solar Combination Alternative</b>
(a)	May affect, but is not likely to adversely affect, tricolored bat and monarch butterfly. No effect on essential fish habitat. No effect on sanctuary resources of National Marine Sanctuaries.					
(b)	Overall, the effects on federally listed species, critical habitat, and essential fish habitat (EFH) would likely be smaller under the no-action alternative than the effects under continued operation, but that would depend on the specific shutdown activities as well as the listed species, critical habitats, and designated EFH present when the no-action alternative is implemented.					
(c)	The types and magnitudes of adverse impacts to species listed in the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq.; TN1010), designated critical habitat, and EFH would depend on the proposed alternative site, nuclear power plant design and operation, as well as listed species and habitats present when the alternative is implemented. Therefore, the NRC staff cannot forecast a level of impact for this alternative.					
(d)	Based on the location of historic properties within and near the area of potential effect, Tribal input, Dominion's administrative procedures, a site-specific cultural resource management plan, and no planned physical changes or ground-disturbing activities, the proposed action (SLR) would not adversely affect historic properties.					
(e)	Until the post-shutdown decommissioning activities report is submitted, the NRC staff cannot determine whether historic properties would be affected outside the existing industrial site boundary after the nuclear power plant is shut down.					
(f)	Impacts of this alternative would be dependent on the specific site location, plant design, layout of buildings, and vertical and horizontal depth of planned ground disturbance activities. The South Carolina Department of Archives and History (SCDAH) would need to be consulted prior to any activities to determine the presence or absence of historic properties. If historic properties are determined to be present, impacts would be assessed and, if applicable, mitigated with the Advisory Council on Historic Preservation, the SCDAH, and consulting Tribes through the Section 106 process.					
(g)	The chronic effects of electromagnetic fields on human health associated with operating nuclear power and other electricity generating plants are uncertain.					
(h)	With the exception of the no-action alternative, there would be no disproportionate and adverse impacts to minority and low-income populations. For the no-action alternative, the loss of jobs and income could have an immediate socioeconomic impact. This could disproportionately affect minority and low-income populations that may have become dependent on these services.					
(i)	NUREG-2157, <i>Generic Environmental Impact Statement for Continued Storage of Spent Nuclear Fuel</i> (NRC 2014-TN4117), discusses the environmental impacts of spent fuel storage for the timeframe beyond the licensed life for reactor operations.					



1 **3 AFFECTED ENVIRONMENT, ENVIRONMENTAL CONSEQUENCES,**  
2 **AND MITIGATING ACTIONS**

3 **3.1 Introduction**

4 In conducting its environmental review of the V.C. Summer SLR, the NRC staff defines and  
5 describes the environment that could be affected by the proposed action (i.e., issuing a  
6 subsequent renewed license authorizing an additional 20 years of operation). The NRC staff  
7 then evaluates the environmental consequences of the proposed action as well as alternatives  
8 to the proposed action.

9 In this chapter, the NRC staff first defines the affected environment as the environment that  
10 currently exists at and around the V.C. Summer site. Because existing conditions are at least  
11 partially the result of past construction and nuclear power plant operations, this chapter  
12 considers the nature and impacts of past and ongoing operations and evaluates how, together,  
13 these actions have shaped the current environment. This chapter also describes reasonably  
14 foreseeable environmental trends. The effects of ongoing reactor operations at the site have  
15 become well established as environmental conditions have adjusted to the presence of the  
16 facility.<sup>1</sup> It is this existing environment that composes the environmental baseline against which  
17 potential environmental effects (or impacts) of license renewal are evaluated.

18 Sections 3.2 through 3.13 of this SEIS describe the affected environment for each resource  
19 area, followed by the NRC staff's evaluation of the environmental consequences of the  
20 proposed action and alternatives to the proposed action. The NRC staff compares the  
21 environmental impacts of SLR with those of the no-action alternative and replacement power  
22 alternatives in order to determine whether the adverse environmental impacts of SLR are so  
23 great that it would be unreasonable to preserve the option for energy-planning decision-makers.

24 The NRC staff's evaluation of environmental consequences includes the following:

- 25 • impacts associated with continued operations of V.C. Summer during the period of extended  
26 operation
- 27 • impacts of the reasonable power replacement alternatives to the proposed action and the  
28 no-action alternative (i.e., not issuing renewed license)
- 29 • impacts common to all alternatives: (1) fuel cycle, including uranium fuel cycle,  
30 (2) terminating V.C. Summer operations and decommissioning, and (3) greenhouse gas  
31 (GHG) emissions and climate change
- 32 • impacts of postulated accidents (i.e., design-basis accidents and severe accidents)
- 33 • cumulative effects of the proposed action
- 34 • resource commitments associated with the proposed action, including unavoidable adverse  
35 impacts, the relationship between short-term use and long-term productivity, and irreversible  
36 and irretrievable commitment of resources
- 37 • new and potentially significant information about environmental issues related to the impacts  
38 of continued operations during the period of extended operation

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<sup>1</sup> Where appropriate, the NRC staff has summarized reference information (incorporated information by reference) in this SEIS. This allows the staff to focus on new and potentially significant information identified since the previous EIS for V.C. Summer.

1 As stated in Sections 1.5 and 1.6, this SEIS documents the NRC staff's environmental review of  
 2 the V.C. Summer SLR application and supplements the information provided in NUREG-1437,  
 3 *Generic Environmental Impact Statement for License Renewal of Nuclear Plants* (LR GEIS)  
 4 (NRC 2024-TN10161). The LR GEIS identifies 80 issues (59 Category 1 [generic], 20  
 5 Category 2 [plant-specific] issues, and 1 uncategorized issue) to be evaluated for the proposed  
 6 action. Section 1.5 of this SEIS explains the criteria for Category 1 issues and Category 2  
 7 issues, as well as the definitions of SMALL, MODERATE, and LARGE impact significance.

8 For the evaluation of Category 1 issues in this SEIS, the NRC staff relies on the analysis in the  
 9 LR GEIS, unless otherwise noted. Table 3-1 lists the applicable Category 1 issues that apply to  
 10 V.C. Summer during the proposed subsequent license renewal period. For these issues, the  
 11 NRC staff did not identify any new or significant information that would change the conclusions  
 12 of the LR GEIS. Therefore, there are no impacts related to issues beyond those discussed in  
 13 the LR GEIS (Table 3-1 and Table 3-2, below), as cited in Sections 3.2 to 3.13 of this SEIS  
 14 below. Section 3.14 of this SEIS describes the NRC staff's process for evaluating new and  
 15 significant information.

16 The NRC staff analyzed the Category 2 (plant-specific) issues applicable to V.C. Summer  
 17 during the proposed SLR period and assigned impacts for these issues as shown in Table 3-2.

18 **Table 3-1 Applicable Category 1 (Generic) Issues for Virgil C. Summer Nuclear Station**  
 19 **Subsequent License Renewal**

Issue	LR GEIS Section	Impact
Land Use – Onsite land use	4.2.1.1	SMALL
Land Use – Offsite land use	4.2.1.1	SMALL
Land Use – Offsite land use in transmission line right-of-ways (ROWS)	4.2.1.1	SMALL
Visual Resources – Aesthetic impacts	4.2.1.2	SMALL
Air Quality – Air quality impacts	4.3.1.1	SMALL
Air Quality – Air quality effects of transmission lines	4.3.1.1	SMALL
Noise – Noise impacts	4.3.1.2	SMALL
Geologic Environment – Geology and soils	4.4.1.1	SMALL
Surface Water Resources – Surface water use and quality (non-cooling system impacts)	4.5.1.1	SMALL
Surface Water Resources – Altered current patterns at intake and discharge structures	4.5.1.1	SMALL
Surface Water Resources – Altered thermal stratification of lakes	4.5.1.1	SMALL
Surface Water Resources – Scouring caused by discharged cooling water	4.5.1.1	SMALL
Surface Water Resources – Discharge of metals in cooling system effluent	4.5.1.1	SMALL
Surface Water Resources – Discharge of biocides, sanitary wastes, and minor chemical spills	4.5.1.1	SMALL
Surface Water Resources – Surface water use conflicts (plants with once-through cooling systems)	4.5.1.1	SMALL
Surface Water Resources – Effects of dredging on surface water quality	4.5.1.1	SMALL
Surface Water Resources – Temperature effects on sediment transport capacity	4.5.1.1	SMALL
Groundwater Resources – Groundwater contamination and use (non-cooling system impacts)	4.5.1.2	SMALL



**Table 3-1 Applicable Category 1 (Generic) Issues for Virgil C. Summer Nuclear Station Subsequent License Renewal (Continued)**

<b>Issue</b>	<b>LR GEIS Section</b>	<b>Impact</b>
Groundwater Resources – Groundwater use conflicts (plants that withdraw less than 100 gallons per minute [gpm])	4.5.1.2	SMALL
Terrestrial Resources – Exposure of terrestrial organisms to radionuclides	4.6.1.1	SMALL
Terrestrial Resources – Cooling system impacts on terrestrial resources (plants with once-through cooling systems or cooling ponds)	4.6.1.1	SMALL
Terrestrial Resources – Cooling tower impacts on terrestrial plants	4.6.1.1	SMALL
Terrestrial Resources – Bird collisions with plant structures and transmission lines	4.6.1.1	SMALL
Terrestrial Resources – Transmission line right-of-way (ROW) management impacts on terrestrial resources	4.6.1.1	SMALL
Terrestrial Resources – Electromagnetic field effects on terrestrial plants and animals	4.6.1.1	SMALL
Aquatic Resources – Entrainment of phytoplankton and zooplankton (all plants)	4.6.1.2	SMALL
Aquatic Resources – Infrequently reported effects of thermal effluents	4.6.1.2	SMALL
Aquatic Resources – Effects of non-radiological contaminants on aquatic organisms	4.6.1.2	SMALL
Aquatic Resources – Exposure of aquatic organisms to radionuclides	4.6.1.2	SMALL
Aquatic Resources – Effects of dredging on aquatic resources	4.6.1.2	SMALL
Aquatic Resources – Non-cooling system impacts on aquatic resources	4.6.1.2	SMALL
Aquatic Resources – Impacts of transmission line right-of-way (ROW) management on aquatic resources	4.6.1.2	SMALL
Socioeconomics – Employment and income, recreation and tourism	4.8.1.1	SMALL
Socioeconomics – Tax revenue	4.8.1.2	SMALL
Socioeconomics – Community services and education	4.8.1.3	SMALL
Socioeconomics – Population and housing	4.8.1.4	SMALL
Socioeconomics – Transportation	4.8.1.5	SMALL
Human Health – Radiation exposures to plant workers	4.9.1.1.1	SMALL
Human Health – Radiation exposures to the public	4.9.1.1.1	SMALL
Human Health – Chemical hazards	4.9.1.1.2	SMALL
Human Health – Microbiological hazards to plant workers	4.9.1.1.3	SMALL
Human Health – Physical occupational hazards	4.9.4.1.5	SMALL
Postulated Accidents – Design-basis accidents	4.9.1.2.1	SMALL
Postulated Accidents – Severe accidents	4.9.1.2.1	SMALL
Waste Management – Low-level waste storage and disposal	4.11.1.1	SMALL
Waste Management – Onsite storage of spent nuclear fuel	4.11.1.2	SMALL
Waste Management – Offsite radiological impacts of spent nuclear fuel and high-level waste disposal	4.11.1.3	(a)
Waste Management – Mixed waste storage and disposal	4.11.1.4	SMALL
Waste Management – Nonradioactive waste storage and disposal	4.11.1.5	SMALL

**Table 3-1 Applicable Category 1 (Generic) Issues for Virgil C. Summer Nuclear Station Subsequent License Renewal (Continued)**

Issue	LR GEIS Section	Impact
Greenhouse Gas Emissions and Climate Change – Greenhouse gas impacts on climate change	4.12.1	SMALL
Uranium Fuel Cycle – Offsite radiological impacts—individual impacts from other than the disposal of spent fuel and high-level waste	4.14.1.5	SMALL
Uranium Fuel Cycle – Offsite radiological impacts—collective impacts from other than the disposal of spent fuel and high-level waste	4.14.1.5	(b)
Uranium Fuel Cycle – Non-radiological impacts of the uranium fuel cycle	4.14.1.5	SMALL
Uranium Fuel Cycle – Transportation	4.14.1.5	SMALL
Termination of Plant Operations and Decommissioning	4.14.2.1	SMALL

gpm = gallon(s) per minute; LR GEIS = *Generic Environmental Impact Statement for License Renewal of Nuclear Power Plants*; ROW = right-of-way.

- (a) The ultimate disposal of spent fuel in a potential future geologic repository is a separate and independent licensing action that is outside the regulatory scope of this review. Per 10 CFR Part 51 (TN10253) Subpart A, Appendix B, the Commission concludes that the impacts presented in NUREG-2157 (NRC 2014-TN4117) would not be sufficiently large to require the NEPA conclusion, for any nuclear power plant, that the option of extended operation under 10 CFR Part 54 (TN4878) should be eliminated. Accordingly, while the Commission has not assigned a single level of significance for the impacts of spent nuclear fuel and high-level waste disposal, this issue is considered generic to all nuclear power plants.
- (b) There are no regulatory limits applicable to collective doses to the general public from fuel cycle facilities. The practice of estimating health effects on the basis of collective doses may not be meaningful. All fuel cycle facilities are designed and operated to meet the applicable regulatory limits and standards. As stated in the 2024 LR GEIS, “The Commission concludes that these impacts are acceptable in that these impacts would not be sufficiently large to require the NEPA conclusion, for any plant, that the option of extended operation under 10 CFR Part 54 should be eliminated.” (10 CFR Part 54; TN4878)

Sources: Table B-1 in Appendix B, Subpart A, to 10 CFR Part 51-TN10253; NRC 2024-TN10161.

- 1 The NRC staff analyzed the applicable Category 2 (plant-specific) issues for V.C. Summer and  
 2 assigned a significance level for each issue as shown in Table 3-2.

3 **Table 3-2 Applicable Category 2 (Plant-Specific) Issues for Virgil C. Summer Nuclear**  
 4 **Station Subsequent License Renewal**

Issue	LR GEIS Section	Impact <sup>(a)</sup>
Surface Water Resources – Surface water use conflicts (plants with cooling ponds or cooling towers using makeup water from a river)	4.5.1.1	SMALL
Groundwater Resources – Groundwater use conflicts (plants with closed-cycle cooling systems that withdraw makeup water from a river)	4.5.1.2.4	SMALL
Groundwater Resources – Groundwater quality degradation (plants with cooling ponds)	4.5.1.2.6	SMALL
Groundwater Resources – Radionuclides released to groundwater	4.5.1.2.7	SMALL
Terrestrial Resources – Non-cooling system impacts on terrestrial resources	4.6.1.1	SMALL
Terrestrial Resources –water use conflicts with terrestrial resources (plants with cooling ponds or cooling towers using makeup water from a river)	4.6.1.1	SMALL

1 **Table 3-2 Applicable Category 2 (Plant-Specific) Issues for Virgil C. Summer Nuclear**  
 2 **Station Subsequent License Renewal (Continued)**

Issue	LR GEIS Section	Impact <sup>(a)</sup>
Aquatic Resources – Impingement mortality and entrainment of aquatic organisms (plants with once-through cooling systems or cooling ponds)	4.6.1.2	SMALL
Aquatic Resources – Effects of thermal effluents on aquatic organisms (plants with once-through cooling systems or cooling ponds)	4.6.1.2	SMALL
Aquatic Resources – Water use conflicts with aquatic resources (plants with cooling ponds or cooling towers using makeup water from a river)	4.6.1.2	SMALL
Federally Protected Ecological Resources – Endangered Species Act: federally listed species and critical habitats under U.S. Fish and Wildlife Service jurisdiction	4.6.1.3.1	May affect but is not likely to adversely affect tricolored bat and monarch butterfly
Historic and Cultural Resources – Historic and cultural resources	4.7.1	No adverse effect to historic properties
Human Health – Microbiological hazards to the public	4.9.1.1.3	SMALL
Human Health – Electromagnetic fields (EMFs) <sup>(b)</sup>	4.9.1.1.4	Uncategorized (Uncertain impact)
Human Health – Electric shock hazards	4.9.1.1.5	SMALL
Environmental Justice – Impacts on minority populations, low-income populations, and Indian Tribes	4.10.1.1	No disproportionate and adverse human health and environmental effects on minority and low-income populations
Greenhouse Gas Emissions and Climate Change – Climate change impacts on environmental resources	4.12.2	See Section 3.15.3 of this SEIS
Cumulative Effects – Cumulative effects	4.13	See Section 3.16 of this SEIS

LR GEIS = *Generic Environmental Impact Statement for License Renewal of Nuclear Power Plants*;

SEIS = supplemental environmental impact statement.

“-” denotes no data in table cell.

(a) Impact determinations for Category 2 issues based on findings described in Sections 3.2 through 3.13 of this SEIS, as applicable, for the proposed action.

(b) This issue was not designated as Category 1 or Category 2 and is discussed in Section 3.11.4 of this SEIS.

Sources: Table B-1 in Appendix B, Subpart A, to 10 CFR Part 51-TN10253; NRC 2024-TN10161.

1 **3.2 Land Use and Visual Resources**

2 This section describes land use and visual resources in the vicinity of the V.C. Summer site as  
 3 well as the potential impacts from the proposed action of SLR and alternatives to the proposed  
 4 action. Section E3.2 of Dominion’s ER describes current V.C. Summer onsite and offsite land  
 5 use conditions as well as visual resources (Dominion 2023-TN10387).

6 **3.2.1 Land Use**

7 V.C. Summer is located on an approximately 2,200 ac (890 ha) site on the southern shore of the  
 8 Monticello Reservoir in Fairfield County, South Carolina. The nearest town is Jenkinsville, which  
 9 is approximately 3 mi (4.8 km) southeast of the site. Columbia is the largest population center in  
 10 the region, approximately 26 mi (42 km) southeast of the site.

11 The sections below describe onsite and offsite land use within a 6 mi (10 km) radius.

12 **3.2.1.1 Onsite Land Use**

13 V.C. Summer plant and ancillary facilities occupy 370 ac (150 ha; or 17 percent) of the site. The  
 14 remainder of the site is comprised of the Monticello Reservoir, forested areas, transmission  
 15 right-of-ways (ROWs), and other developed areas, including the abandoned Unit 2 and Unit 3  
 16 construction site. As shown in Table 3-3, the predominant land cover at the V.C. Summer site is  
 17 open water (38 percent), evergreen forest (19 percent), high intensity development (10 percent),  
 18 and scrub/shrub (7 percent).

19 **Table 3-3 Land Cover, Virgil C. Summer Nuclear Station Site**

Category	Acres	Percentage
Open Water	835.1	37.7
Developed, Open Space	76.9	3.5
Developed, Low Intensity	91.0	4.1
Developed, Medium Intensity	152.6	6.9
Developed, High Intensity	209.3	9.5
Barren Land (Rock/Sand/Clay)	29.8	1.4
Deciduous Forest	58.0	2.6
Evergreen Forest	421.2	19.0
Mixed Forest	54.0	2.4
Shrub/Scrub	153.0	6.9
Grassland/Herbaceous	73.8	3.3
Pasture/Hay	54.5	2.5
Woody Wetlands	1.8	0.1
Emergent Herbaceous Wetlands	2.4	0.1
<b>TOTAL</b>	<b>2,213.5</b>	<b>100.0</b>

Source: Dominion 2023-TN10387.

1 Fairfield County has zoned V.C. Summer as an Industrial District (I-1) per its zoning map that  
 2 was adopted in 2012 (Fairfield County 2011-TN10392). Access to the plant is from South  
 3 Carolina Highways 215 and 213, and Bradham Boulevard. There is rail access via a Norfolk  
 4 Southern rail line spur located southwest of the site. Duke Energy maintains two 230 kV  
 5 transmission lines in a ROW to the west of the site.

6 **3.2.1.2 Offsite Land Use**

7 The 6 mi (10 km) vicinity surrounding V.C. Summer includes portions of Fairfield, Newberry,  
 8 Lexington, and Richland counties. As shown in Table 3-4, the largest land use/land cover in the  
 9 vicinity is evergreen forest (41 percent), followed by mixed forests (15 percent), open water  
 10 (13 percent), and deciduous forest (8 percent).

11 **Table 3-4 Land Use/Land Cover, 6 mi (10 km) Radius of the Virgil C. Summer Nuclear**  
 12 **Station Site**

Category	Acres	Percentage
Open Water	9,647.5	13.3
Developed, Open Space	2,103.0	2.9
Developed, Low Intensity	712.8	1.0
Developed, Medium Intensity	462.4	0.6
Developed, High Intensity	459.7	0.6
Barren Land (Rock/Sand/Clay)	132.5	0.2
Deciduous Forest	5,491.4	7.6
Evergreen Forest	29,402.4	40.6
Mixed Forest	11,092.8	15.3
Shrub/Scrub	4,576.0	6.3
Grassland/Herbaceous	3,013.9	4.2
Pasture/Hay	2,448.6	3.4
Cultivated Crops	390.7	0.5
Woody Wetlands	2,288.7	3.2
Emergent Herbaceous Wetlands	215.5	0.3
<b>TOTAL</b>	<b>72,437.7</b>	<b>100.0</b>

Source: Dominion 2023-TN10387.

13 Fairfield County is approximately 439,218 ac (177,745 ha), of which 73,082 ac (29,575 ha)  
 14 (17 percent) are farmland. Newberry County is approximately 403,228 ac (163,181 ha), of which  
 15 94,810 ac (38,368 ha) (24 percent) are farmland. Lexington County is approximately 447,398 ac  
 16 (181,056 ha), of which 102,585 ac (41,515 ha) (23 percent) are farmland. Richland County is  
 17 approximately 484,572 ac (196,099 ha), of which 52,401 ac (21,206 ha) (11 percent) are  
 18 farmland. Major crops in these counties include forage, soybeans, cotton, peanuts, wheat, and  
 19 corn. Livestock includes cattle, poultry, hogs and pigs, and sheep and lambs.

20 Each of the above counties has issued a comprehensive plan in accordance with  
 21 Section 6-29-720 of the South Carolina code, which requires that zoning and development  
 22 regulations be made in accordance with the comprehensive plan (Fairfield County 2024-  
 23 TN10393; Lexington County 2022-TN10394; Newberry County 2024-TN10395; and Richland  
 24 County 2015-TN10396).

1 **3.2.2 Visual Resources**

2 As discussed above, V.C. Summer is located to the south of the Monticello Reservoir in Fairfield  
3 County, South Carolina. Predominant visual features include the reactor containment building  
4 (the tallest building on site at 166 ft [51 m]), auxiliary buildings, control building, turbine building,  
5 diesel generator building, and transmission corridors. Areas surrounding the site are generally  
6 forested, with interspersed farmland and residences. The site can be seen from the Monticello  
7 Reservoir from portions of SC 215, and from lands on the east of the Monticello Reservoir.

8 **3.2.3 Proposed Action**

9 As described in the LR GEIS (NRC 2024-TN10161) and as cited in Table 3-1, for generic issues  
10 related to land use and visual resources, the impacts of a nuclear power plant LR and continued  
11 operations would be SMALL. The NRC staff's review did not identify any new and significant  
12 information that would change the conclusions in the LR GEIS. Thus, as concluded in the  
13 LR GEIS, for these Category 1 (generic) issues, the impacts of continued operation of  
14 V.C. Summer on land use and visual resources would be SMALL. There are no plant-specific  
15 (Category 2) air quality issues applicable to V.C. Summer.

16 **3.2.3.1 Onsite Land Use**

17 Operational activities during the SLR term would be similar to those already occurring at  
18 V.C. Summer. Additional spent fuel and low-level radioactive waste generated during the SLR  
19 term could result in the need for additional onsite storage; such actions would be addressed in  
20 separate reviews by the NRC. The NRC staff's review did not identify any new and significant  
21 information that would change the conclusions in the LR GEIS; the impact of continued nuclear  
22 power plant operations on onsite land use during the V.C. Summer SLR term would be SMALL.

23 **3.2.3.2 Offsite Land Use**

24 License renewal and subsequent license renewal activities have little to no effect on offsite land  
25 use in communities near nuclear power plants. Operational activities during the SLR term,  
26 including periodic nuclear refueling outages requiring temporary staff, would be similar to those  
27 already occurring at the plant and would not affect offsite land use beyond what has already  
28 been affected. The NRC staff's review did not identify any new and significant information that  
29 would change the conclusions in the LR GEIS; the impact of continued nuclear power plant  
30 operations on offsite land use, including within offsite transmission line ROWs, during the V.C.  
31 Summer SLR term would be SMALL.

32 **3.2.3.3 Visual Resources**

33 The visual appearance of the V.C. Summer nuclear power plant structures and associated  
34 transmission lines has become well established over the plant's operating history and is not  
35 likely to change during the SLR term. The NRC staff's review did not identify any new and  
36 significant information that would change the conclusions in the LR GEIS. The NRC staff  
37 concludes that the visual impact of continued nuclear power plant operations at V.C. Summer  
38 during the SLR term would be SMALL because the visual appearance of nuclear power plant  
39 structures, transmission lines, and vapor plume from the cooling towers will not change  
40 appreciably.

1 **3.2.4 No-Action Alternative**

2 3.2.4.1 *Land Use*

3 Under the no-action alternative, the NRC would not issue a renewed V.C. Summer operating  
4 license, and reactor power generating operations would cease on or before the expiration of the  
5 current renewed license. However, maintenance activities (e.g., maintaining, inspecting, and  
6 testing plant equipment) would continue before and after the expiration of the license.  
7 Decommissioning activities would begin after the expiration of the license. Under this  
8 alternative, onsite land use would remain similar to onsite land use under the proposed SLR.  
9 Plant structures and other facilities would remain in place until decommissioning. Transmission  
10 lines and ROWs would remain in place after the cessation of reactor operations.

11 Shutdown of V.C. Summer would not affect land use. Based on this information, the NRC staff  
12 concludes that land use impacts under the no-action alternative would be SMALL.

13 3.2.4.2 *Visual Resources*

14 Termination of reactor operations because the operating license is not renewed under the  
15 no-action alternative would not immediately change the visual appearance of the V.C. Summer  
16 site. The most visible structures are the reactor containment and other buildings, and they would  
17 likely remain in place for some time during decommissioning until they are eventually  
18 dismantled. There would be no further operational impacts such as the vapor plumes associated  
19 with the cooling towers. As a result, the NRC staff concludes that the visual impacts from the  
20 no-action alternative would be SMALL.

21 **3.2.5 Replacement Power Alternatives: Common Impacts**

22 3.2.5.1 *Land Use*

23 Land use impacts are determined by the change in use and the amount of land affected by the  
24 construction and operation of a replacement power generating facility, infrastructure, and other  
25 installations. Table 3-5 below summarizes land use impacts of replacement power alternatives.

26 3.2.5.2 *Visual Resources*

27 Visual impacts are determined by the degree of contrast between the replacement power  
28 generating facility and the surrounding landscape and the visibility of the new power plant.

29 Construction

30 Installation of power generating facilities and support structures at existing power plant sites  
31 would be consistent with visual character of the industrial site. Land for any replacement power  
32 generating facility would require clearing, excavation, and the use of construction equipment.  
33 Temporary visual impacts may occur during construction because of the use of cranes and other  
34 construction equipment. If most of the components of this alternative are constructed at the  
35 abandoned V.C. Summer Units 2 and 3 project site, new visual impacts may be minimal.  
36 However, construction of new offsite solar at greenfield sites could result in new visual impacts.  
37 As such, the NRC staff concludes that construction and installation of the natural gas, new  
38 nuclear, and new nuclear and solar combination alternatives would have a SMALL visual impact,  
39 and the natural gas and solar combination alternative, which involves the construction of new  
40 solar and associated transmission offsite, would have a SMALL to MODERATE visual impact.

1 **Table 3-5 Land Use Impacts of Replacement Power Alternatives for Virgil C. Summer**  
 2 **Nuclear Station**

Alternative	Resource Requirements	Impacts	Discussion
Natural Gas	48 ac at the abandoned V.C. Summer Units 2 and 3 project site	SMALL	All construction and operations would occur on the already disturbed abandoned V.C. Summer Units 2 and 3 project site.
New Nuclear (SMR)	130 ac at the abandoned V.C. Summer Units 2 and 3 project site	SMALL	All construction and operations would occur on the already disturbed abandoned V.C. Summer Units 2 and 3 project site.
Natural Gas and Solar Combination Alternative	NGCC: 48 ac at the abandoned V.C. Summer Units 2 and 3 project site Solar: over 500 ac at the abandoned V.C. Summer project site; approximately 3,200 ac offsite, with approximately 1,400 ac of new transmission lines	MODERATE TO LARGE	Construction and operations of the NGCC and one of the solar installations would occur on the already disturbed abandoned V.C. Summer Units 2 and 3 project site. The offsite aspects of this alternative would require three separate solar installations and associated new transmission lines.
New Nuclear and Solar Combination Alternative	SMR: 130 ac at the abandoned V.C. Summer Units 2 and 3 project site Solar: approximately 700 ac at the abandoned V.C. Summer Units 2 and 3 project site	SMALL TO MODERATE	All construction and operations would occur on the already disturbed abandoned V.C. Summer Units 2 and 3 project site; these impacts would be larger than the standalone NGCC and SMR alternatives.

ac = acre(s); NGCC = natural gas-fired combined-cycle; SMR = small modular reactor.  
 Source: Resource requirements based on Dominion 2023 (TN10387).

3 **Operations**

4 Visual impacts during power plant operations of any of the replacement power alternatives  
 5 would be similar in type and magnitude. Combustion turbines and SMRs would be tall enough,  
 6 and solar panels could be seen offsite from a distance, depending on screening vegetation and  
 7 landscape. Transmission lines would be visible, unless screened. Vapor plumes associated with  
 8 mechanical draft cooling towers would be the most noticeable visual impact and would likely be  
 9 visible farther from the site than other buildings and infrastructure. Aircraft warning lights on  
 10 power plant stacks or towers would be visible at night. After completing construction and  
 11 installation, the NRC staff concludes that power plant operations for each of the replacement  
 12 power alternatives would have a SMALL visual impact.

13 **3.3 Meteorology, Air Quality, and Noise**

14 **3.3.1 Meteorology**

15 South Carolina’s climate is humid subtropical characterized by hot and humid summers and  
 16 mild winters. The Bermuda High, a semipermanent high-pressure system in the North Atlantic  
 17 Ocean, provides a flow of warm, moist air from the Atlantic Ocean (Runkle et al. 2022-TN7161).  
 18 The Appalachian Mountains block cold air masses moving in from the northwest, which leads to  
 19 the mild winters. Annual average temperature varies from the mid-50s °F in the mountains to



1 the mid-60s °F along the coast. Annual precipitation varies, with the northwest part of the State  
2 averaging 80 in. (2.0 m), and the Midlands averaging 39 in. (1.0 m). Extreme weather threats for  
3 South Carolina include hurricanes (in the summer and fall) and severe thunderstorms (in late  
4 winter and spring) which can produce tornadoes.

5 Dominion maintains a meteorological monitoring system that comprises one onsite  
6 meteorological tower. The meteorological tower measures temperature, wind speed, wind  
7 direction, and precipitation. In its ER, Dominion provided meteorological observations  
8 (temperature measurements and wind conditions) from the meteorological system for the  
9 1992–2021 period (2023-TN10387). While the meteorological tower has the capability to  
10 measure precipitation, Dominion does not maintain precipitation data from the onsite  
11 meteorological tower; therefore, the data was not available for the 1992–2021 period of record  
12 (2024-TN10391). The NRC staff obtained climatological data from the Columbia Metropolitan  
13 Airport (KCAE) weather station (NCEI 2024-TN10570). The station is approximately 38 mi  
14 (61 km) from the V.C. Summer site and was used to characterize the region’s climate because  
15 of its relative location and long period of record.

16 The mean annual temperature from the Columbia weather station for the period of record  
17 (1945–2022) is 63.9°F (17.7°C), with a mean monthly temperature ranging from a low of 45.2°F  
18 (7.3°C) in January to a high of 81.9°F (27.7°C) in July (NCEI 2024-TN10570). The mean annual  
19 temperature from V.C. Summer’s onsite meteorological tower is 65.2°F (18.4°C) with a mean  
20 monthly temperature ranging from a low of 45.1°F (7.3°C) in January to a high of 82.9°F  
21 (28.3°C) in July (Dominion 2023-TN10387). The mean annual precipitation from the Columbia  
22 weather station for the period of record (1945–2022) is 47 in. (1.2 centimeters [cm]), with a  
23 mean monthly precipitation ranging from a low of 2.70 in. (6.9 cm) in November to a high of  
24 5.45 in. (13.8 cm) in July and August (NCEI 2024-TN10570). The mean annual wind speed from  
25 the Columbia weather station for the period of record (1984–2022) is 6.1 miles per hour (mph)  
26 (9.8 kilometers per hour [kph]), with a prevailing wind direction from the west–southwest  
27 (NCEI 2024-TN10570). The mean annual wind speed from V.C. Summer’s onsite  
28 meteorological tower is 6.8 mph (10.9 kph), with a prevailing wind direction from the southwest  
29 (Dominion 2023-TN10387).

30 The following numbers of severe weather events have been reported in Fairfield County from  
31 January 1950 through May 2024 (NOAA 2024-TN10526):

- 32 • tornadoes: 30 events
- 33 • hail: 89 events
- 34 • flash flood: 5 events
- 35 • thunderstorm wind: 284 events

### 36 **3.3.2 Air Quality**

37 The EPA has set primary and secondary National Ambient Air Quality Standards (NAAQS)  
38 (40 CFR Part 50, “National Primary and Secondary Ambient Air Quality Standards” [TN1089])  
39 for six common criteria pollutants to protect sensitive populations and the environment. The  
40 NAAQS criteria pollutants include carbon monoxide (CO), lead, nitrogen dioxide (NO<sub>2</sub>), ozone,  
41 SO<sub>2</sub>, and PM. PM is further categorized by size—PM<sub>10</sub> (diameter of 10 micrometers or less) and  
42 PM<sub>2.5</sub> (diameter of 2.5 micrometers or less).

43 The EPA designates areas of attainment and nonattainment with respect to meeting NAAQS.  
44 Areas for which there are insufficient data to determine attainment or nonattainment are

1 designated as unclassifiable. Areas that were once in nonattainment, but are now in attainment,  
2 are called maintenance areas; these areas are under a 10-year monitoring plan to maintain their  
3 attainment designation status. States have primary responsibility for ensuring attainment and  
4 maintenance of the NAAQS. Under the Clean Air Act of 1970 (CAA) Section 110 (42 U.S.C.  
5 7410) (Clean Air Act-TN1141) and related provisions, States are to submit, for EPA approval,  
6 State implementation plans that provide for the timely attainment and maintenance of the  
7 NAAQS.

8 In South Carolina, air quality designations are made at the county level. For the purpose of  
9 planning and maintaining ambient air quality with respect to the NAAQS, the EPA has  
10 developed air quality control regions (AQCRs). AQCRs are intrastate or interstate areas that  
11 share a common airshed. V.C. Summer is located in Fairfield County, which is part of the  
12 Columbia Intrastate AQCR (40 CFR Part 81-TN7226). With respect to NAAQS, the EPA  
13 designated Fairfield County and all the counties in the Columbia Intrastate AQCR in attainment  
14 for all NAAQS (EPA 2024-TN10527).

15 The South Carolina Department of Health and Environmental Control (SCDHEC) issues and  
16 enforces air permits under the authority of the CAA. Sources of air emissions at V.C. Summer  
17 include multiple emergency diesel generators, mechanical draft cooling towers equipped with  
18 drift eliminators, storage tanks, and a paint booth (Dominion 2023-TN10387, Dominion 2024-  
19 TN10391). Additionally, during outages, a rented auxiliary boiler is used (Dominion 2024-  
20 TN10391). South Carolina's regulations exempt various sources from permitting requirements,  
21 including the following (SCDHEC 2015-TN10528: Sections 48-1-10 et seq. of the 1976 South  
22 Carolina Code of Laws):

- 23 • Emergency power generators with a capacity less than or equal to 150 kW.
- 24 • Emergency power generators of greater than 150 kW rated capacity operated for a total of  
25 500 hours per year or less for testing and maintenance.
- 26 • Sources with a total uncontrolled potential to emit less than 5 tons/year of particulates, SO<sub>2</sub>,  
27 NO<sub>x</sub>, and carbon monoxide, and a total of less than 1,000 pounds (lb)/month of volatile  
28 organic compounds.

29 In 2012, Dominion received an exemption from the requirements to obtain an air permit for  
30 V.C. Summer, and, as such, there are no annual reporting requirements with respect to air  
31 emission sources at V.C. Summer (2023-TN10387).

32 Small amounts of ozone and substantially smaller amounts of NO<sub>x</sub> are produced during corona,  
33 a phenomenon that occurs when air ionizes near isolated irregularities on the conductor surface  
34 of transmission lines. During corona, ozone is approximately 90 percent of the oxidants  
35 generated, and NO<sub>x</sub> are approximately 10 percent (BLM 2010-TN9626). Dominion has not  
36 conducted field tests of ozone or nitrogen oxide emissions generated by V.C. Summer's 115 kV  
37 and 230 kV in-scope transmission lines (2024-TN10391). However, field studies have shown  
38 that high voltage lines up to 765 kV do not generate emissions above ambient measurements  
39 (Lee et al. 1989-TN7481; TVA 2013-TN7899; NRC 2015-TN5842).

40 The EPA promulgated the Regional Haze Rule to improve and protect visibility in national parks  
41 and wilderness areas from haze, which is caused by numerous, diverse air pollutant sources  
42 located across a broad region (40 CFR 51.308–309-TN1090). Specifically, 40 CFR Part 81,  
43 Subpart D, "Identification of Mandatory Class I Federal Areas Where Visibility Is an Important  
44 Value," lists mandatory Federal areas where visibility is an important value. The Regional Haze

1 Rule requires states to develop State implementation plans to reduce visibility impairment at  
2 Class I Federal Areas. There are no Class I Federal Areas in South Carolina. The nearest  
3 Class I Federal Area from V.C. Summer (i.e., Great Smoky Mountains National Park) is over  
4 100 mi (160 km) away.

### 5 **3.3.3 Noise**

6 Noise is unwanted sound and can be generated by many sources. Sound intensity is measured  
7 in logarithmic units called decibels (dB). A dB is the ratio of the measured sound pressure level  
8 to a reference level equal to a normal person's threshold of hearing. Most people barely notice a  
9 difference of 3 dB or less. Another characteristic of sound is frequency or pitch. Noise may be  
10 composed of many frequencies, but the human ear does not hear very low or very high  
11 frequencies. To represent noise as closely as possible to the noise levels people experience,  
12 sounds are measured using a frequency-weighting scheme known as the A-scale. Sound levels  
13 measured on this A-scale are given in units of A-weighted decibels (dBA). Levels can become  
14 annoying at 80 dBA and very annoying at 90 dBA. To the human ear, each increase of 10 dBA  
15 sounds twice as loud (EPA 1981-TN7412).

16 Several different terms are commonly used to describe sounds that vary in intensity over time.  
17 The equivalent sound intensity level (Leq) represents the average sound intensity level over a  
18 specified interval, often 1 hour. The day–night sound intensity level is a single value calculated  
19 from hourly Leq during a 24-hour period, with the addition of 10 dBA to sound levels from  
20 10 p.m. to 7 a.m. This addition accounts for the greater sensitivity of most people to  
21 nighttime noise. The statistical sound level (Ln) is the sound level that is exceeded n percent  
22 of the time during a given period. For example, L90, is the sound level exceeded 90 percent  
23 of the time and is considered the background level.

24 V.C. Summer is located in a largely rural area, with forests and small farms composing the  
25 dominant land use. The nearest resident is approximately 1.0 mi (1.6 km) east–southeast of the  
26 reactor building (Dominion 2023-TN10387). Fairfield County has a noise ordinance that  
27 stipulates maximum sound levels in residential and nonresidential areas (measured at the  
28 property line). In a nonresidential area, maximum sound levels should not exceed 70 dBA  
29 between the hours of 6 a.m. and 10:00 p.m. or 65 dBA between the hours of 10:00 p.m. and  
30 6:00 a.m. (Fairfield County 2019-TN10529: Section 16-65 of Code of Ordinances Fairfield  
31 County). Primary offsite (i.e., beyond the site boundary) noise sources in the immediate vicinity  
32 of V.C. Summer include traffic, rifle range, and railroad operations (SCDHEC 2015-TN10528;  
33 Dominion 2024-TN10391). Primary noise sources at V.C. Summer include pumps, turbine,  
34 generators, switchyard equipment, transformers, cooling tower, and loudspeakers (Dominion  
35 2023-TN10387). Dominion has not conducted offsite noise surveys (2024-TN10391). Between  
36 2018–2023, Dominion did not receive noise complaints related to operation of V.C. Summer  
37 (2023-TN10387, 2024-TN10391).

### 38 **3.3.4 Proposed Action**

#### 39 **3.3.4.1 Air Quality**

40 As described in the LR GEIS (NRC 2024-TN10161) and as cited in Table 3-1, for generic issues  
41 related to air quality, the impacts of a nuclear power plant SLR and continued operations would  
42 be SMALL. The NRC staff's review did not identify any new and significant information that would  
43 change the conclusion in the LR GEIS. Thus, as concluded in the LR GEIS, for these Category 1

1 (generic) issues, the impacts of continued operation of V.C. Summer on air quality would be  
2 SMALL. There are no plant-specific (Category 2) air quality issues applicable to V.C. Summer.

### 3 3.3.4.2 *Noise*

4 As described in the LR GEIS (NRC 2024-TN10161) and as cited in Table 3-1, for the generic  
5 issue related to noise, the impacts of a nuclear power plant SLR and continued operations  
6 would be SMALL. The NRC staff's review did not identify any new and significant information  
7 that would change the conclusion in the LR GEIS. V.C. Summer does not anticipate future  
8 upgrades or replacement activities during the SLR term to support plant operation that could  
9 introduce new noise sources or increase in sound levels. Thus, as concluded in the LR GEIS,  
10 for these Category 1 (generic) issues, the impacts of continued operation of V.C. Summer on  
11 noise would be SMALL. There are no plant-specific (Category 2) noise issues applicable to  
12 V.C. Summer.

## 13 3.3.5 **No-Action Alternative**

### 14 3.3.5.1 *Air Quality*

15 Under the no-action alternative, the permanent cessation of V.C. Summer operations would  
16 reduce overall air emissions (e.g., from boiler, diesel generators, and vehicle traffic). Therefore,  
17 the NRC staff concludes that if emissions decrease, the impact on air quality from the shutdown  
18 of V.C. Summer would be SMALL.

### 19 3.3.5.2 *Noise*

20 The permanent cessation of V.C. Summer operations would result in a reduction in noise from  
21 the pumps, turbine, generators, switchyard equipment, transformers, cooling tower,  
22 loudspeakers, and worker vehicles. As site activities are reduced, the NRC staff expects the  
23 impact on ambient noise levels to be less than current plant operations; therefore, the NRC staff  
24 concludes that impacts on noise levels from the no-action alternative would be SMALL.

## 25 3.3.6 **Replacement Power Alternatives: Common Impacts**

### 26 3.3.6.1 *Air Quality*

27 Construction of a replacement power alternative would result in temporary impacts on local air  
28 quality. Air emissions include criteria air pollutants (e.g., PM, NO<sub>x</sub>, carbon monoxide, and SO<sub>2</sub>),  
29 volatile organic compounds, hazardous air pollutants, and GHGs. Air emissions would be  
30 intermittent and would vary based on the level and duration of specific activities throughout the  
31 construction phase. During the construction phase, the primary sources of air emissions would  
32 consist of engine exhaust and fugitive dust emissions. Engine exhaust emissions would be from  
33 heavy construction equipment and commuter, delivery, and support vehicular traffic traveling to  
34 and from the facility as well as within the site. Fugitive dust emissions would be from soil  
35 disturbances by heavy construction equipment (e.g., earthmoving, excavating, and bulldozing),  
36 vehicle traffic on unpaved surfaces, concrete batch plant operations, and, to a lesser extent,  
37 wind erosion. Various mitigation techniques and best management practices (e.g., watering  
38 disturbed areas, reducing equipment idle times, and using ultra-low sulfur diesel fuel) could be  
39 used to minimize air emissions and to reduce fugitive dust.

1 The impacts on air quality from operation of a facility for a replacement power alternative would  
2 depend on the energy technology (e.g., nuclear or renewable). Worker vehicles, auxiliary power  
3 equipment, and mechanical cooling towers would result in air emissions.

#### 4 3.3.6.2 *Noise*

5 Construction of a replacement power facility would be similar to the construction of any  
6 industrial facility in that they all involve many noise-generating activities. In general, noise  
7 emissions would vary during each phase of construction, depending on the level of activity,  
8 types of equipment and machinery used, and site-specific conditions. Typical construction  
9 equipment, such as dump trucks, loaders, bulldozers, graders, scrapers, air compressors,  
10 generators, and mobile cranes, would be used, and pile-driving and blasting activities could take  
11 place. Other noise sources include construction worker vehicle and truck delivery traffic.  
12 However, noise from vehicular traffic would be intermittent.

13 Noise generated during operations could include noise from transformers, mechanical draft  
14 cooling towers, turbines, equipment, speakers, as well as offsite sources, such as employee  
15 and delivery vehicular traffic. Noise from vehicles would be intermittent.

### 16 3.3.7 **Natural Gas Alternative**

#### 17 3.3.7.1 *Air Quality*

18 For the natural gas alternative, air emissions and sources for construction would include those  
19 identified as common to all replacement power alternatives in Section 3.3.6.1 of this SEIS. The  
20 natural gas alternative would be located at the abandoned V.C. Summer Units 2 and 3 project  
21 site. Use of the existing infrastructure would be maximized, including use of the existing  
22 transmission lines and corridors, as well as natural gas transmission pipeline. A relatively small  
23 land requirement would be needed for construction of the natural gas alternative. Therefore,  
24 fugitive dust emissions would not be significant. Overall, air emissions from construction of the  
25 natural gas alternative would be intermittent, short-term, and temporary.

26 Operation of a natural gas alternative would result in emissions of criteria pollutants and GHGs.  
27 The NRC staff estimated air emissions for the natural gas alternative using emission factors  
28 developed by the DOE's National Energy Technology Laboratory (NETL 2022-TN10530). The  
29 NRC staff estimates the following annual air emissions would result from operation of a natural  
30 gas alternative with a design capacity of 1,110 MWe:

- 31 • CO—58 tons (52 metric tons [MT])
- 32 • NO<sub>x</sub>—107 tons (97 MT)
- 33 • SO<sub>2</sub>—29 tons (26 MT)
- 34 • PM—58 tons (53 MT)
- 35 • CO<sub>2</sub> equivalents—3.6 million tons (3.3 million MT)

36 Operation of mechanical draft cooling towers and worker vehicles would result in additional air  
37 emissions. A new natural gas alternative would need to secure a permit from the SCDHEC for  
38 air pollutants associated with its operation. The natural gas alternative would emit more than  
39 100 tons/year of NO<sub>x</sub> and would thus qualify as a major emitting industrial facility. As such, the  
40 new natural gas plant would be subject to Prevention of Significant Deterioration and Title V air

1 permitting requirements under the Clean Air Act of 1970, as amended (42 U.S.C. 7661 et seq.),  
2 to ensure that air emissions are minimized and that the local air quality is not degraded  
3 substantially.

4 Nitrogen oxide emissions from operation of natural gas plant could be significant. Therefore, the  
5 NRC staff concludes that the overall air quality impacts associated with operation of a natural  
6 gas alternative would be MODERATE.

### 7 3.3.7.2 Noise

8 Noise generated during the construction and operation of a natural gas plant would be similar to  
9 noise for all replacement power alternatives as discussed in Section 3.3.6.2 of this SEIS. Noise  
10 impacts during construction would be limited to the immediate vicinity of the site. The nearest  
11 resident is located approximately 1.0 mi (1.6 km) from the site (NRC 2011-TN10532, NRC  
12 2011-TN10533). Noise generated as a result of construction of a natural gas alternative at the  
13 V.C. Summer Units 2 and 3 site would not be noticeable given the existing industrial setting,  
14 distance of noise-sensitive receptors from the site, and consideration of noise attenuation from  
15 the construction site.

16 During operations, noise sources from a natural gas alternative would include those discussed  
17 in Section 3.3.6.2 of this SEIS, as well as offsite mechanical noise from compressor stations  
18 and pipeline blowdowns. Most of the noise-producing equipment (e.g., turbines, pumps, and  
19 mechanical draft cooling towers) would be located inside the power block. Since the natural gas  
20 alternative would be located at the abandoned V.C. Summer Units 2 and 3 site, the NRC staff  
21 does not anticipate noise levels at noise-sensitive receptors to be significantly greater than  
22 currently or previously experienced from operation of V.C. Summer. The Federal Energy  
23 Regulatory Commission requires that any new compressor station, compression added to an  
24 existing station, or any modification, upgrade, or update of an existing station must not exceed  
25 day–night sound intensity level of 55 dBA at any pre-existing noise-sensitive area (18 CFR  
26 157.206(b)(5)(i)-TN7483). Day–night sound intensity level of 55 dBA was designated by the  
27 EPA as a noise level that is adequate to protect against outdoor activities (EPA 1974-TN3941).  
28 Additionally, noise from pipeline blowdowns would not constitute a new noise source at the  
29 V.C. Summer Units 2 and 3 site given the existing natural gas pipeline. Therefore, the NRC staff  
30 concludes that the noise impacts from operation of a natural gas alternative would be SMALL.

## 31 3.3.8 New Nuclear (Small Modular Reactor) Alternative

### 32 3.3.8.1 Air Quality

33 Air emissions and sources associated with construction of the new nuclear alternative located at  
34 the abandoned V.C. Summer Units 2 and 3 site would include those identified as common to all  
35 replacement power alternatives as described in Section 3.3.6.1 of this SEIS. Air emissions from  
36 construction of the new nuclear alternative would be intermittent, short term, and temporary  
37 (NRC 2019-TN6136).

38 Operation of the new nuclear alternative would result in air emissions similar in magnitude to air  
39 emissions from the operation of V.C. Summer. Sources of air emissions would include  
40 stationary combustion sources (e.g., diesel generators, auxiliary boilers, and gas turbines),  
41 mechanical draft cooling towers, and mobile sources (e.g., worker vehicles, onsite heavy  
42 equipment, and support vehicles). The mechanical draft cooling towers could contribute to  
43 impacts associated with the formation of visible plumes, fogging, and subsequent icing  
44 downwind of the towers.

1 In general, most stationary combustion sources at a nuclear power plant would operate only for  
2 limited periods, often during periodic maintenance testing. A new nuclear power plant may need  
3 to secure a permit from the SCDHEC for air emission sources associated operations. As such,  
4 the NRC staff expects the air emissions for combustion sources from a new nuclear power plant  
5 to be similar to those currently being emitted from V.C. Summer (see Section 3.3.6.1 of this  
6 SEIS). Therefore, the NRC staff expects that the air quality impact of emissions from onsite  
7 sources would be minor.

8 Given that the new nuclear alternative would result in air emissions similar in magnitude to air  
9 emissions from the operation of V.C. Summer and given the designated in attainment status for  
10 all NAAQS of Fairfield County, the NRC staff does not expect air emissions from operation of a  
11 new nuclear alternative to contribute to NAAQS violations. The NRC staff concludes that the  
12 impacts of operation of a new nuclear alternative on air quality would be SMALL.

### 13 3.3.8.2 *Noise*

14 Noise generated during the construction and operation of a new nuclear power plant would be  
15 similar to noise for all replacement power alternatives, as discussed in Section 3.3.6.2 of this  
16 SEIS. Noise impacts during construction would be limited to the immediate vicinity of the site.  
17 The nearest resident is located approximately 1.0 mi (1.6 km) from the site (NRC 2011-  
18 TN10532, NRC 2011-TN10533). Based on the temporary nature of construction activities, the  
19 distance of noise-sensitive receptors from the site, and consideration of noise attenuation from  
20 the construction site, the NRC staff concludes that the potential noise impacts of construction  
21 activities from a new nuclear alternative would not be noticeable.

22 Sources of noise during nuclear power plant operations would include industrial equipment,  
23 machinery, vehicles, and communications. Given that the site for the new nuclear alternative  
24 would be the abandoned V.C. Summer Units 2 and 3 site, the NRC staff does not anticipate  
25 noise levels at noise-sensitive receptors to be significantly greater than currently or previously  
26 experienced from operation of V.C. Summer. Therefore, noise from operations of a new nuclear  
27 alternative would not be noticeable to noise-sensitive receptors. The NRC staff concludes that  
28 the noise impacts from construction and operation of a new nuclear alternative would be  
29 SMALL.

## 30 **3.3.9 Natural Gas and Solar Combination Alternative**

### 31 3.3.9.1 *Air Quality*

32 Air emissions associated with construction of the natural gas portion of the combination  
33 alternative would be similar to those associated with the natural gas alternative discussed in  
34 Section 3.3.7.1 of this SEIS, given that the natural gas portion would be located in the  
35 abandoned V.C. Summer Units 2 and 3 site and the existing transmission infrastructure and  
36 natural gas transmission pipeline on site would be used. Air emissions and sources for  
37 construction of the renewable portion of this alternative would include those identified as  
38 common to all replacement power alternatives in Section 3.3.6.1 of this SEIS. Solar panels with  
39 battery storage would not have power block buildings. Accordingly, the amount of heavy  
40 equipment and workforce, level of activities, and construction duration would be lower, and,  
41 consequently, fewer air emissions would be generated at the site location. However, solar  
42 installations located in South Carolina (but not in the abandoned V.C. Summer Units 2 and 3  
43 site) would require construction of new transmission lines.

1 Air emissions associated with operation of the natural gas portion of the combination alternative  
2 would be similar, but less than, those associated with the natural gas alternative discussed in  
3 Section 3.3.7.1 of this SEIS, since it would consist of one 700 MWe natural gas plant at the  
4 abandoned V.C. Summer Units 2 and 3 site. The NRC staff estimated air emissions for the  
5 natural gas portion of this combination alternative using emission factors developed by the  
6 DOE's National Energy Technology Laboratory (NETL 2022-TN10530). The NRC staff  
7 estimates the following annual air emissions would result from operation of a natural gas portion  
8 of this combination alternative:

- 9 • CO—37 tons (33 MT)
- 10 • NO<sub>x</sub>—67 tons (61 MT)
- 11 • SO<sub>2</sub>—18 tons (16 MT)
- 12 • PM—67 tons (61 MT)
- 13 • carbon dioxide equivalents—2.3 million tons (2.1 million MT)

14 Operation of mechanical draft cooling towers and worker vehicles would result in additional air  
15 emissions. A new natural gas alternative would need to secure a permit from the SCDHEC for  
16 air pollutants associated with its operation. Emissions would be less than those for the natural  
17 gas alternative, but still noticeable.

18 Direct air emissions associated with operation of the solar with battery storage of this alternative  
19 are negligible because no fossil fuels are burned to generate electricity. Emissions would  
20 include fugitive dust and engine exhaust from worker vehicles and heavy equipment associated  
21 with site inspections, maintenance activities, and wind erosion from cleared lands and access  
22 roads. Emissions would be localized and intermittent.

23 Given that emissions from the natural gas portion of this combination alternative can be  
24 noticeable, the NRC staff concludes that the overall air quality impacts associated with  
25 construction and operation of the natural gas and solar combination alternative would be  
26 SMALL to MODERATE.

### 27 3.3.9.2 *Noise*

28 Construction-related noise sources for the natural gas portion of the combination alternative  
29 would be similar to the natural gas alternative discussed in Section 3.3.7.2 of this SEIS. The  
30 solar with battery portion of this alternative would have no power block buildings requiring  
31 construction. The amount of heavy equipment and workforce, level of activities, and  
32 construction duration would be lower than those for other alternatives. Noise levels generated  
33 by construction activities of a solar facility can range from 70 to 80 dBA at 50 feet (ft) (15 m)  
34 (BLM 2019-TN8386). The nearest resident to the V.C. Summer Units 2 and 3 site is  
35 approximately 1.0 mi (1.6 m). The nearest resident or noise-sensitive receptors for the solar  
36 panel with battery offsite location (located in South Carolina, but not in the abandoned  
37 V.C. Summer Units 2 and 3 site) is unknown. Additionally, construction of transmission lines  
38 would be needed, and noise levels may be noticeable to nearby noise-sensitive receptors along  
39 transmission corridors during construction. Therefore, noise levels during construction to nearby  
40 noise-sensitive receptors may be noticeable.

41 Operation-related noise sources for the natural gas portion of the combination alternative would  
42 be similar to the natural gas alternative discussed in Section 3.3.7.2 of this SEIS. The solar  
43 portion with battery storage of this alternative would have no power block or cooling towers, and



1 a minimal number of noise sources, such as transformers and vehicular traffic, would be  
2 associated with maintenance and inspection activities.

3 Given that noise associated with construction of the offsite solar panel with battery storage of  
4 the combination alternative can be noticeable to noise-sensitive receptors, the NRC staff  
5 concludes that the noise impacts associated with the natural gas and solar combination  
6 alternative would be SMALL to MODERATE.

### 7 **3.3.10 New Nuclear and Solar Combination Alternative**

#### 8 *3.3.10.1 Air Quality*

9 Air emissions associated with construction of the new nuclear portion of the combination  
10 alternative would be similar to those associated with the new nuclear alternative discussed in  
11 Section 3.3.8.1 of this SEIS., given that the new nuclear portion would be located in the  
12 abandoned V.C. Summer Units 2 and 3 site and the existing infrastructure would be used. Air  
13 emissions and sources for construction of the solar portion of this alternative would include  
14 those identified as common to all replacement power alternatives as described in  
15 Section 3.3.6.1 of this SEIS. Solar panels with battery storage would not have power block  
16 buildings. Accordingly, the amount of heavy equipment and workforce, level of activities, and  
17 construction duration would be lower, and, consequently, fewer air emissions would be  
18 generated at the site location. The solar with battery storage would be located at the  
19 V.C. Summer Units 2 and 3 site, and the existing transmission line infrastructure would also be  
20 used.

21 Air emissions associated with operation of the new nuclear portion of the combination  
22 alternative would be similar to those associated with the new nuclear alternative discussed in  
23 Section 3.3.8.1 of this SEIS. Direct air emissions associated with operation of solar with battery  
24 storage of this alternative are negligible because no fossil fuels are burned to generate  
25 electricity. Emissions would include fugitive dust and engine exhaust from worker vehicles and  
26 heavy equipment associated with site inspections, maintenance activities, and wind erosion  
27 from cleared lands and access roads. Emissions would be localized and intermittent.

28 The NRC staff concludes that the overall air quality impacts associated with construction and  
29 operation of the new nuclear and solar combination alternative would be SMALL.

#### 30 *3.3.10.2 Noise*

31 Construction-related noise sources and impacts for the new nuclear portion of the combination  
32 alternative would be similar to the new nuclear alternative discussed in Section 3.3.8.2 of this  
33 SEIS. The solar with battery portion of this alternative would have no power block buildings  
34 requiring construction. The amount of heavy equipment and workforce, level of activities, and  
35 construction duration would be lower than those for other alternatives. Construction-related  
36 noise would be limited to immediate vicinity of the abandoned V.C. Summer Units 2 and 3 site  
37 since the existing transmission infrastructure would be used. Noise levels generated by  
38 construction activities of a solar facility can range from 70 to 80 dBA at 50 ft (15 m) (BLM 2019-  
39 TN8386). The nearest resident to the V.C. Summer Units 2 and 3 site is approximately 1.0 mi  
40 (1.6 km). At a 0.5 mi (0.8 km) distance from construction equipment, 70–80 dBA noise levels  
41 can drop to 35–45 dBA. Based on the temporary nature of construction activities, the distance of  
42 noise-sensitive receptors from the site, and consideration of noise attenuation from the

1 construction site, the NRC staff concludes that the potential noise impacts of construction  
2 activities from a new nuclear and solar combination alternative would not be noticeable.

3 Operation-related noise sources and impacts for the new nuclear portion of the combination  
4 alternative would be similar to the new nuclear alternative discussed in Section 3.3.8.2 of this  
5 SEIS. The solar with battery storage portion of this alternative would have no power block or  
6 cooling towers. A minimal number of noise sources, such as transformers and vehicular traffic,  
7 would be associated with maintenance and inspection activities. The NRC staff does not  
8 anticipate noise levels at noise-sensitive receptors from operation of a new nuclear and solar  
9 combination alternative at the V.C. Summer Units 2 and 3 site to be significantly greater than  
10 currently or previously experienced from operation of V.C. Summer. The NRC staff concludes  
11 that the noise impacts associated with the combination alternative would be SMALL.

## 12 **3.4 Geologic Environment**

13 This section of the SEIS summarizes the descriptive information about the geologic environment  
14 of the V.C. Summer site and site vicinity as provided in the Section E3.5 of the applicant's ER  
15 (Dominion 2023-TN10387). The descriptive information addresses regional geology and  
16 physiography, site geology, soils, and seismic history. The analysis by the NRC staff regarding  
17 potential environmental impacts on geology and soils from the proposed SLR action and  
18 alternatives to the proposed action follows the information summary.

### 19 **3.4.1 Physiography and Regional Geology**

20 From northwest to southeast, the region within 200 mi (321.8 km) of the V.C. Summer site  
21 includes portions of five physiographic provinces: the Appalachian Plateau, Valley and Ridge,  
22 Blue Ridge, Piedmont, and Coastal Plain (Dominion 2023-TN10409). The V.C. Summer site is  
23 located within the Piedmont physiographic province (Dominion 2023-TN10387: Figure E3.5-1),  
24 which is characterized by gently to steeply rolling hills underlain by crystalline metamorphic and  
25 plutonic igneous intrusive rocks. These rock units comprise the competent, tectonically  
26 deformed bedrock at the site and in the site vicinity. The base grade elevation of the  
27 V.C. Summer site is approximately 335 ft (102 m) mean sea level (MSL) within the competent  
28 bedrock (Dominion 2023-TN10387), which is 100 ft (30.5 m) above the graded ground surface  
29 of 435 ft (133 m) MSL.

### 30 **3.4.2 Site Geology**

31 Topography of the V.C. Summer site area is characterized by relatively gentle hills, typical of the  
32 Piedmont and well-drained mature valleys. Maximum topographic relief is approximately 250 ft  
33 (76 m) (Dominion 2023-TN10409). The site specifically overlies the Winnsboro plutonic complex  
34 with three major rock categories identified. The first and most prevalent rock category consists  
35 of granodiorite and quartz diorite intrusive igneous masses associated with the Winnsboro  
36 plutonic complex that are dated at about 300 million years (Ma) in age (Dominion 2023-  
37 TN10409). The second rock category consists of amphibolite grade metamorphic rocks  
38 comprising biotite and hornblende gneiss and amphibolite schist. The third rock category  
39 consists of migmatite associated with the contact margins between the intrusive igneous and  
40 metamorphic units (Dominion 2023-TN10409). Saprolite, which is produced by in-place  
41 chemical weathering of indurated rock units, and residual soils range from several feet to  
42 several tens of feet (approximately 1 to 20 m) in thickness. Alluvium occurs locally along the  
43 Broad River, in Frees Creek, and in the flatter segments of smaller drainages and gullies  
44 (Dominion 2023-TN10387). Geologic cross sections A-A' (Figure 3-8 in this SEIS) and B-B' in

1 the ER (Dominion 2023-TN10387: Figures E3.5-3b and E3.5-3c, pp. E-3-70 and E-3-71) show  
2 that unconsolidated materials, including engineered fill and saprolite, occur from 0 to 89 ft (0 to  
3 27.1 m) below ground surface at the site. Those cross sections indicate that the underlying  
4 competent bedrock elevation surface is variable due to the development of saprolite, which  
5 ranges in thickness from 0 to 40 ft (0 to 12.2 m) beneath the fill.

### 6 **3.4.3 Geologic Resources**

7 Geologic resources in the V.C. Summer region include intrusive igneous granitic rock bodies;  
8 whole, crushed, or broken stone; and clay, sand, and gravel (USGS 2023-TN10591). Multiple  
9 inactive stone quarries are located within 5 mi (8 km) of the site, the nearest of which is  
10 approximately 2 mi (3.3 km) south of the site. Fairfield County produces construction grade  
11 sand, gravel, and crushed stone (USGS 2019-TN9149), and also produced gold from the  
12 Kenecott Ridgeway mine until 1999 (USGS 2024-TN10855; Wachob et al. 2009-TN9029).

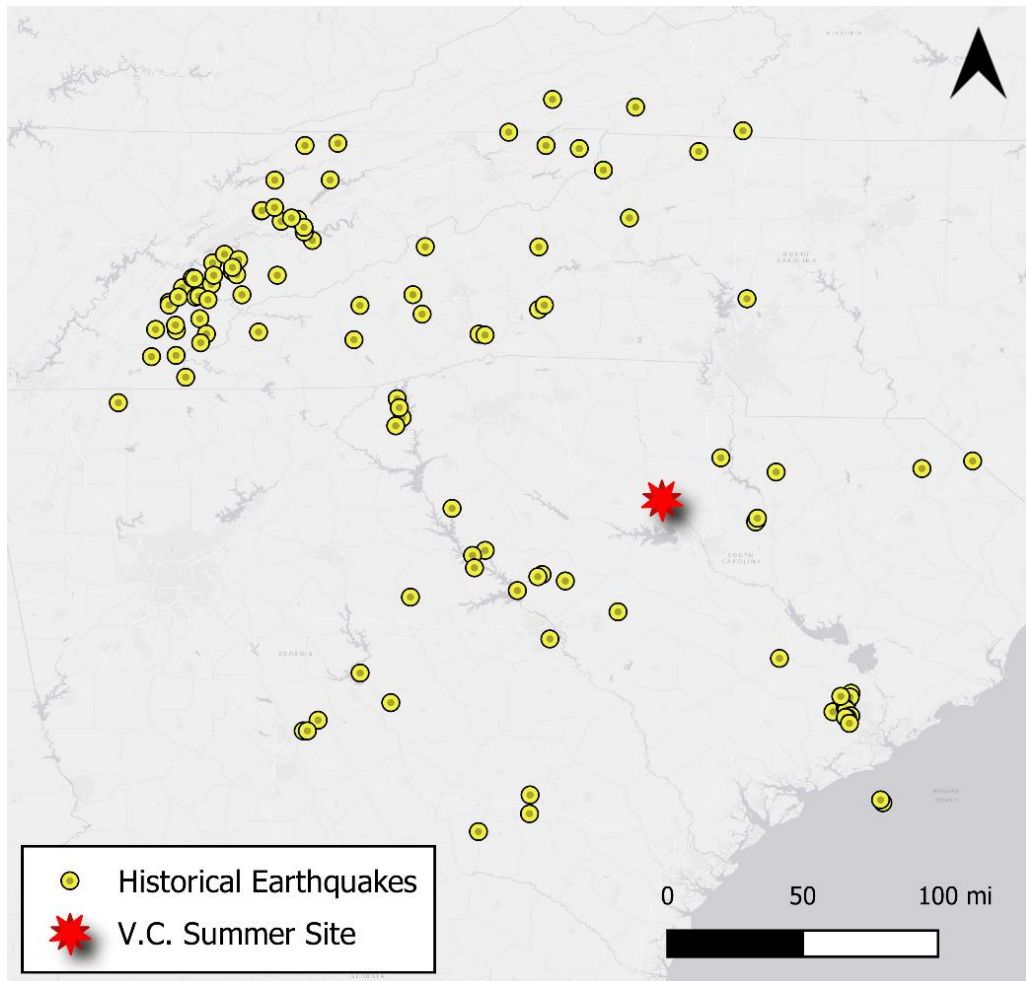
### 13 **3.4.4 Soils**

14 Natural soils and rock materials across the V.C. Summer site were graded and disturbed during  
15 nuclear power plant construction. Where soils are present and undisturbed within the  
16 V.C. Summer plant boundary, mapping by the U.S. Department of Agriculture Natural  
17 Resources Conservation Service shows that the soils consist mainly of various types of loam,  
18 including: Hiwassee sandy clay loam (15.6 percent of site area), Pacolet sand loam  
19 (15.5 percent of site area), and Wilkes sand loam (15.4 percent of site area) (USDA 2024-  
20 TN10398). The majority of the undisturbed soils of the site area (excluding soil units mapped  
21 within the Monticello Reservoir) are not classed as prime farmland. The Hiwassee (except  
22 HwC2 and HsB), Iredell, and Cecil soil groups are classified as farmland of statewide  
23 importance. An area of Chewacla soil in the southwest portion of the site is classified as prime  
24 farmland if drained and either protected from flooding or not frequently flooded during the  
25 growing season. An area of Goccoa soil on the western boundary of the site is designated as  
26 prime farmland if protected from flooding or not frequently flooded during the growing season.

27 The Natural Resources Conservation Service rates all soils on the site as either somewhat  
28 limited or very limited for shallow excavations (USDA 2024-TN10398). The Wilkes sandy loam  
29 (ranging from 6–40 percent slopes), Wateree-Rion complex, and Pacolet sandy loam soil  
30 groups that are present predominantly within the disturbed areas of the plant and in the western  
31 portion of the site boundary are rated severe for erosion potential, indicating significant erosion  
32 is expected without mitigating measures. Areas of the site composed of sandy clay loams, such  
33 as the Madison sandy clay loam (ranging from 6–25 percent slopes), Hiwassee sandy clay  
34 loam, and Cecil sandy clay loam are rated slight to moderate for expected erosion. These soils  
35 are predominantly present in the eastern portion of the site area. Stabilization measures to  
36 prevent erosion and sedimentation impacts to the site and surrounding area have been in place  
37 at the V.C. Summer site since operations began in the early 1970s (Dominion 2023-TN10387).  
38 Dominion maintains a Stormwater Pollution Prevention Plan (SWPPP) for the plant site that  
39 identifies best management practices (BMPs) to reduce pollutants in stormwater discharges and  
40 includes a sediment and erosion control program. Measures include graveled surfaces in  
41 industrial areas to reduce sediment transport, as well as vegetated filters in specific locations to  
42 provide sediment and erosion control. The SWPPP includes the provision for adding new BMPs  
43 if new areas of concern are identified (Dominion 2023-TN10387). The SWPPP is associated  
44 with the general industrial NDPEs permit (SCR000000) that is maintained by Dominion for the  
45 site.

1 **3.4.5 Seismic History**

2 The V.C. Summer site is located within the Piedmont physiographic province, 25 mi (40 km)  
3 northwest from the boundary with the Coastal Plain physiographic province (Nystrom 1996-  
4 TN10399). Approximately 70 percent of the earthquakes that occur in South Carolina are  
5 located in the Coastal Plain with the single densest cluster in the area around Charleston, which  
6 experienced an earthquake in 1886 with a Modified Mercalli intensity of X—the highest intensity  
7 value on the Modified Mercalli scale and indicative of extreme ground shaking. The closest  
8 known regional fault is a normal fault in the Lake Murray area that is about 13 mi (21 km) south  
9 of the V.C. Summer site. Evidence indicates that this fault has been inactive for at least about  
10 200 million years (Dominion 2023-TN10409; SCE&G 2010-TN2024). The Eastern Tennessee  
11 Seismic Zone, one of the most seismically active areas in the eastern United States, is located  
12 approximately 175 mi (282 km) northwest of the site. No historical earthquakes in the Eastern  
13 Tennessee Seismic Zone have occurred at magnitudes great enough to be damaging.  
14 Figure 3-1 shows the locations of historic seismic events of magnitude greater than or equal to  
15 Richter magnitude 3 within 200 mi (322 km) of the V.C. Summer site from January 1970 through  
16 August 26, 2024.



17  
18 **Figure 3-1 Historical Earthquakes of Magnitude Greater Than or Equal to Richter**  
19 **Magnitude 3 within 200 mi (322 km) of the Virgil C. Summer Nuclear Station**  
20 **(January 1970–August 26, 2024). Source: USGS 2024-TN10534.**

1 Following the initial filling of the Monticello Reservoir, thousands of small reservoir-induced  
2 earthquakes occurred for several years in the vicinity of the V.C. Summer site. Occasional  
3 small-magnitude earthquakes still originate at the reservoir. The majority of the reservoir-  
4 induced seismic events are less than Richter magnitude 3 and are generally too small to be felt  
5 (SCEMD Undated-TN10400).

6 In 2023, the U.S. Geological Survey published updated seismic hazard maps that included the  
7 region encompassing the V.C. Summer site (Petersen et al. 2024-TN9940). Seismic hazard  
8 (i.e., peak ground acceleration) for a specific location due to shaking induced by an earthquake  
9 is expressed as a percentage of  $g$ , the gravitational acceleration near the Earth's surface, to  
10 assess the potential impact of the earthquake on engineered structures. Several factors,  
11 including the properties of rock and sedimentary materials through which the earthquake waves  
12 travel as well as earthquake magnitude and location, control the level of ground shaking that  
13 can occur. Based on the 2023 seismic hazard maps, the V.C. Summer site is in an area with a  
14 predicted peak horizontal ground acceleration between 0.36 and 0.60  $g$  with a 2 percent  
15 probability of exceedance in 50 years, corresponding to a return period of about 2,500 years.  
16 This acceleration corresponds to a Modified Mercalli Intensity of VII for a 2 percent probability of  
17 exceedance in 50 years, indicating a moderate risk for damaging ground shaking of intensity V  
18 or greater in the next 50 years. Previous peak horizontal acceleration estimates and intensity  
19 levels for the site were 0.28 to 0.4  $g$ , and VII, respectively (Petersen et al. 2020-TN7281).

20 The impacts of natural phenomena associated with geologic and seismic hazards on nuclear  
21 power plant systems, structures, and components are outside the scope of the NRC staff's LR  
22 environmental review. V.C. Summer was originally sited, designed, and licensed with due  
23 consideration for applicable geologic and seismic criteria. Seismic issues at operating nuclear  
24 power plants are assessed as part of the NRC's ongoing regulatory oversight. Furthermore, the  
25 NRC requires all licensees to consider seismic activity to maintain safe operating conditions at  
26 all nuclear power plants. When new seismic hazard information becomes available, the NRC  
27 staff evaluates that information to determine whether any changes are necessary at existing  
28 nuclear power plants. This Reactor Oversight Process, which considers seismic safety, is  
29 separate and distinct from the SLR environmental review performed by the NRC staff.

### 30 **3.4.6 Proposed Action**

31 As documented in the 2024 LR GEIS (NRC 2024-TN10161) for the generic Category 1 geology  
32 and soils issue, the impact of SLR and continued operations for V.C. Summer would be SMALL.  
33 The finding in 10 CFR Part 51 (TN10253), Subpart A, Appendix B, Table B-1 related to geology  
34 and soils indicates that this generic Category 1 issue would result in a SMALL impact for all  
35 nuclear power plants.

36 The NRC staff independently reviewed applicable information for geology and soils in the  
37 applicant's ER (Dominion 2023-TN10387) and associated references therein, considered  
38 information discussed during site audits and the scoping process, and evaluated other sources  
39 of available information (e.g., USGS 2024-TN10855 for geologic resources and Petersen et al.  
40 2024-TN9940 for seismic hazard maps). The NRC staff did not identify any new and significant  
41 information related to geology and soils that would change the environmental impact  
42 determination stated in the 2024 LR GEIS (NRC 2024-TN10161) for this Category 1 generic  
43 issue. No significant impacts on geology and soils are anticipated during the SLR term to  
44 implement the proposed action that would be different from those occurring during the current  
45 license term. Thus, as documented in the LR GEIS and 10 CFR Part 51, the NRC staff  
46 concludes that impacts of subsequent license renewal related to the geology and soils issue

1 would be SMALL for V.C. Summer. There are no applicable Category 2 issues related to  
2 geology and soils that require consideration for the V.C. Summer SLR.

### 3 **3.4.7 No-Action Alternative**

4 The no-action alternative would involve not renewing the existing operating license. With the  
5 subsequent cessation of operations, there would be little or no additional impact on geology and  
6 soils. Any contamination of onsite geology or soils would be assessed during decommissioning,  
7 whether at the end of the current licensing period or at the end of the SLR period. A license  
8 termination plan would describe any necessary actions needed for site-specific cleanup before  
9 release of the V.C. Summer site. Consequently, the NRC staff concludes that the impact of the  
10 no-action alternative on geology and soils would be SMALL.

### 11 **3.4.8 Replacement Power Alternatives: Common Impacts**

#### 12 Construction

13 Construction activities associated with replacement power alternatives might result in temporary  
14 impacts on geology and soils if excavations for facility foundations or slope stabilization are  
15 necessary. Potential impacts would vary based on depth of excavations for impacts on geology  
16 and acreage of the area disturbed for impacts on soils. The NRC staff assumes that aggregate  
17 materials (e.g., crushed stone, riprap, sand, and gravel) needed to construct buildings,  
18 foundations, roads, parking lots, pad sites, transmission lines, and other supporting  
19 infrastructure would be obtained from local suppliers. The NRC staff expects that any impacts  
20 from construction of replacement alternatives on geology and soils would be localized and of  
21 short duration. Potential impacts would be prevented or mitigated by implementation of BMPs  
22 and Federal, State, and local permitting requirements.

#### 23 Operation

24 Consumption of aggregate materials or topsoil for maintenance purposes during operations  
25 would be negligible. The NRC staff expects that operation activities associated with replacement  
26 power alternatives would not result in any detrimental impacts on geology and soils because  
27 there would be no disruptions affecting geology and soils during normal operation of those  
28 alternatives.

### 29 **3.4.9 Natural Gas Alternative**

30 The natural gas alternative would require construction of multiple combustion turbines, a heat  
31 recovery generator, and a steam turbine generator. Construction and operation of the plant  
32 would occur over 48 ac (19.4 ha) of the already disturbed V.C. Summer site, including  
33 abandoned Units 2 and 3. The impacts on geologic and soil resources from the NGCC plant  
34 alternative would likely be similar to, but of lesser intensity than, those described and assumed  
35 to be common to all alternatives in Section 3.4.8 of this SEIS. Existing transmission  
36 infrastructure and corridors could be used, in addition to an existing natural gas transmission  
37 pipeline currently located on site (with a minimal extension). Therefore, the NRC staff concludes  
38 that the impacts on geology and soil resources from the natural gas combined cycle alternative  
39 would be SMALL.

1 **3.4.10 New Nuclear (Small Modular Reactor) Alternative**

2 The new nuclear alternative would involve installation and operation of two 12-unit SMRs, which  
3 would utilize the abandoned V.C. Summer Units 2 and 3 site. The cooling system for the units  
4 would have mechanical draft cooling towers using makeup water from the existing Monticello  
5 Reservoir, and the existing transmission corridors/infrastructure could be used. Using the  
6 existing infrastructure at the V.C. Summer site to the maximum extent possible reduces  
7 potential construction impacts and other related impacts on site geology and soils, as well as  
8 consumption of geologic resources. Disturbance of geologic strata and soil erosion and loss  
9 under this alternative would generally be localized at the construction sites, and any necessary  
10 offsite soil erosion impacts would be mitigated by using BMPs. However, excavation work for  
11 the nuclear power block associated with the SMR modules could extend to a depth of  
12 approximately 140 ft (43 m) below grade (NRC 2019-TN6136) involving an additional 40 ft  
13 (12.2 m) below the existing site excavation depth. This increased depth would require  
14 excavation of additional rock material and the application of methods (e.g., grouting and  
15 dewatering) to stabilize the deep excavation during construction. The current V.C. Summer site  
16 utilizes a non-safety related dewatering system to prevent water intrusion to plant structures,  
17 and additional capacity provided by additional wells might be required. Because this alternative  
18 would require deep excavations for the two SMRs and substantial soil disturbance, the NRC  
19 staff concludes that the overall impacts on geology and soil resources from the new nuclear  
20 alternative would be SMALL to MODERATE.

21 **3.4.11 Natural Gas and Solar Combination Alternative**

22 The natural gas and solar combination alternative involves the construction and operation of an  
23 NGCC plant (as described in Section 3.4.9 of this SEIS) as well as the construction and  
24 operation of three solar installations with battery storage at the existing V.C. Summer site. Three  
25 additional solar installations would be constructed offsite in South Carolina. The impacts on  
26 geologic and soil resources from this alternative would likely be similar to but of greater intensity  
27 from those described and assumed to be common to all alternatives in Section 3.4.8 of this  
28 SEIS and to the natural gas alternative in Section 3.4.9 of this SEIS. The impacts would be due  
29 to the additional land requirements to support the offsite solar installations and associated  
30 transmission corridors. Disturbance of geologic strata, soil erosion, and loss under this  
31 alternative would generally be shallow and localized to the construction sites. Offsite soil erosion  
32 impacts would be mitigated by using BMPs. Based on these considerations, the NRC staff  
33 concludes that the potential impacts on geology and soil resources from the natural gas and  
34 solar combination alternative would be SMALL.

35 **3.4.12 New Nuclear and Solar Combination Alternative**

36 The new nuclear and solar combination alternative involves the installation and operation of one  
37 12-unit SMR and one solar installation with battery storage at the V.C. Summer Units 2 and 3  
38 site. Additional land disturbance outside the existing site would be required to support the  
39 battery storage of the solar installation, but existing transmission infrastructure and corridors  
40 could be used. The impacts on geologic and soil resources from this alternative would likely be  
41 similar to but of lesser intensity than the standalone new nuclear alternative described in  
42 Section 3.4.10 of this SEIS. Because this alternative would require a deep excavation for the  
43 SMR and substantial soil disturbance, the NRC staff concludes that the overall impacts on  
44 geology and soil resources from the new nuclear and solar combination alternative would be  
45 SMALL to MODERATE.

1 **3.5 Water Resources**

2 This section of the SEIS describes surface water and groundwater resources at and around the  
3 V.C. Summer site. The description of the resources is followed by the staff's analysis of the  
4 potential impacts on surface water and groundwater resources from the proposed action (SLR)  
5 and alternatives to the proposed action.

6 **3.5.1 Surface Water Resources**

7 Surface water encompasses all water bodies that occur above the ground surface, including  
8 rivers, streams, lakes, ponds, and manmade reservoirs or impoundments.

9 *3.5.1.1 Surface Water Hydrology*

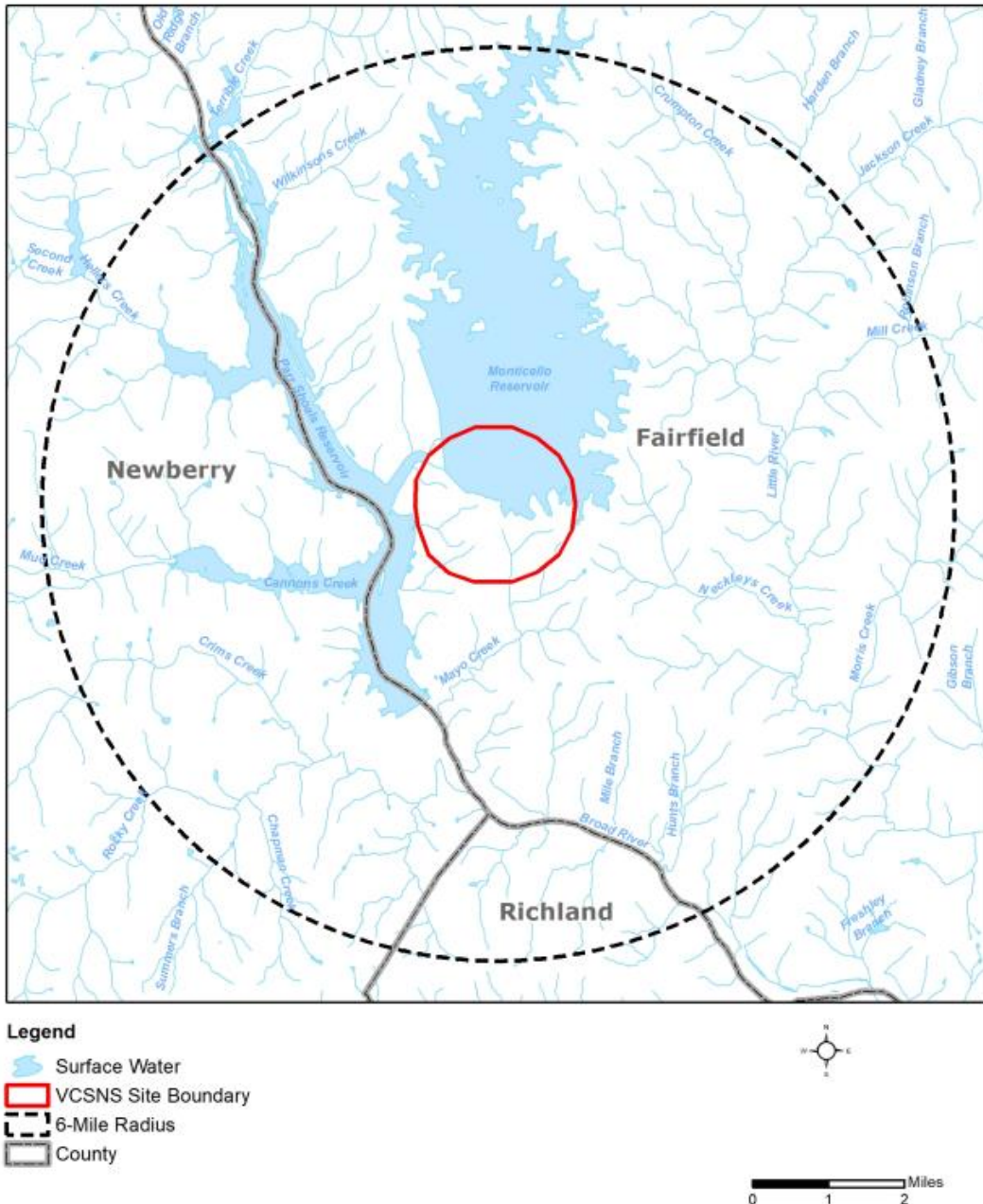
10 Local and Regional Hydrology

11 V.C. Summer is located in Fairfield County, South Carolina. Nearby cities include Winnsboro  
12 and Columbia. V.C. Summer is located in the Piedmont physiographic province, characterized  
13 by hilly terrain with broad stream valleys. The surrounding area has numerous small streams,  
14 and the Broad River is the major river near V.C. Summer, located approximately 1 mi (1.5 km)  
15 west of the plant site (Figure 3-2). The Broad River is a major river in South Carolina and its  
16 watershed covers approximately 12 percent (3,800 square miles [mi<sup>2</sup>], 9,842 square kilometers  
17 [km<sup>2</sup>]) of the State (BRBC 2024-TN10402). The majority of the Broad River watershed is either  
18 forested or agricultural land (BRBC 2024-TN10402).

19 The V.C. Summer site is located topographically above the Broad River along the southwestern  
20 shore of Monticello Reservoir. The Monticello Reservoir was created by damming the outlet of  
21 the small 17 mi<sup>2</sup> (44 km<sup>2</sup>) Frees Creek Valley watershed, a small tributary of the Broad River.  
22 Monticello Reservoir is also hydraulically connected to a small 300 ac (121 ha) water body  
23 called the Monticello Sub-impoundment that is used for recreational boating and fishing  
24 (Dominion 2023-TN10387). The Broad River to the west of the site is dammed, and the  
25 dammed section of the river is called Parr Shoals Reservoir (hereafter referred to as Parr  
26 Reservoir). Together, the Parr Reservoir and Monticello Reservoir are operated as the lower  
27 and upper portions of the Fairfield Pumped Storage Facility.

28 The Parr Reservoir was constructed in 1914, decades before the creation of the Monticello  
29 Reservoir, to provide water to the 15 MW downstream Parr Hydroelectric Plant. The Fairfield  
30 Pumped Storage Facility was constructed in 1977, which involved expanding the capacity of  
31 Parr Reservoir and building the Monticello Reservoir. The Monticello Reservoir has a surface  
32 area of 6,800 ac (2,751 ha) and storage capacity of 431,000 ac-ft (531.6 million cubic meter  
33 [million m<sup>3</sup>]) (Dominion 2023-TN10387). The Monticello Reservoir serves the dual purpose of  
34 supplying cooling water for V.C. Summer and also serving as the upper water storage reservoir  
35 for the Fairfield Pumped Storage Project. The pumped storage project generates hydroelectric  
36 power during peak power demand periods by releasing water from Monticello Reservoir.  
37 Storage for Monticello Reservoir is replenished by pumping water from Parr Reservoir during  
38 non-peak power demand periods. Daily releases and pumping can transfer up to 29,000 ac-ft  
39 (35.8 million m<sup>3</sup>) of water between the two reservoirs, with the magnitude of daily releases  
40 varying seasonally and depending on power needs. Pumped storage operations occur year-  
41 round.





1  
 2 **Figure 3-2 Major Surface Water Features in the Vicinity of the Virgil C. Summer**  
 3 **Nuclear Station Site. Source: Dominion 2023-TN10387.**

4 The Broad River near the V.C. Summer site is approximately 2,000 ft (610 m) wide with depths  
 5 of up to 15 ft (4.6 m). While local runoff from the Frees Creek Valley can be stored by the  
 6 Monticello Reservoir, the operation of the pumped storage project is the primary source of water  
 7 to maintain storage. Reliable flow from the Broad River is therefore essential to providing water  
 8 supply to the Monticello Reservoir. Over the last 43 years (i.e., from 1980 to 2023), the lowest  
 9 recorded flow on the Broad River 1.2 mi (1.9 km) downstream of Parr Reservoir was 48.3 cfs or  
 10 approximately 25.9 million gallons per day (MGD) (1.37 cubic meter per second [ $m^3/s$ ]) on  
 11 September 12, 2002 (USGS 2024-TN10403, USGS 2024-TN10828), and the lowest monthly  
 12 mean flow was 546 cfs or approximately 293.8 MGD (15.5  $m^3/s$ ) in August 2002 (USGS 2024-

1 TN10404). Water levels in Monticello Reservoir are continuously monitored by V.C. Summer.  
2 Releases from Monticello Reservoir and pumping from Parr Reservoir maintain relatively  
3 constant water levels in Monticello Reservoir. An alarm system is triggered if water levels  
4 exceed 427 ft (130.1 m) MSL or fall below 419 ft (127.7 m) MSL.

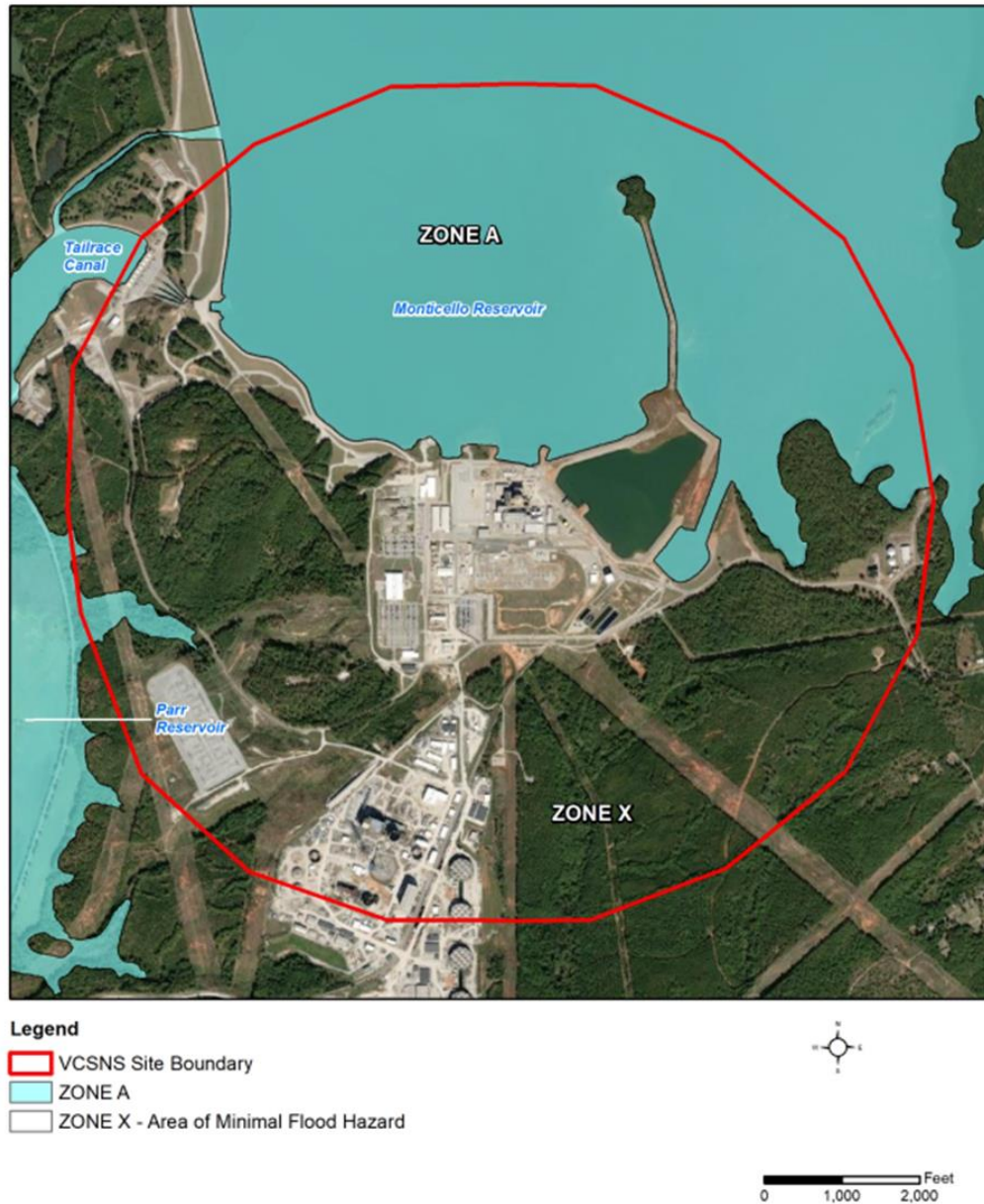
5 V.C. Summer uses a once-through cooling system. Monticello Reservoir is the source of cooling  
6 water for V.C. Summer, and after being passed through the condensers, cooling water is  
7 discharged back into the Monticello Reservoir. There is a single circulating water intake  
8 structure comprising of three pump bays located along the south shoreline of Monticello  
9 Reservoir. Cooling water is discharged into the cooling water discharge canal to the southeast  
10 of the V.C. Summer intake structure.

#### 11 Flooding

12 Flooding at the V.C. Summer site from the Broad River/Parr Reservoir is unlikely because the  
13 river and reservoir are topographically separated from the site. The V.C. Summer site is located  
14 in Federal Emergency Management flood hazard Zone X (minimal flood hazard) (Figure 3-3).  
15 The Monticello and Parr Reservoirs are mapped as Zone A, indicating that they are in the  
16 1 percent chance floodplain. The V.C. Summer plant grade (435 ft [132.6 m] MSL) is  
17 approximately 10 ft (3 m) above the maximum operating level of Monticello Reservoir (425 ft  
18 [129.5 m] MSL). Additionally, the location and design of safety-related structures, exterior  
19 access, equipment, and systems relative to the shoreline of Monticello Reservoir reduce the  
20 possible hazard of flooding from storm-generated waves to these key features.

21 Stream gauge data for the Broad River in the vicinity of V.C. Summer are available at three  
22 USGS locations: Carlisle station 02156500 (24.6 mi [39.6 km] upstream of Parr Dam), Alston  
23 station 02161000 (1.2 mi [1.9 km] downstream of Parr Dam), and Richtex station 02161500  
24 (10.2 mi [16.4 km] downstream of Parr Dam). Historical flow data show two flood seasons that  
25 occur between January and April and between July to October, with the latter flood season  
26 having larger high flow events associated with hurricanes. Based on available peak streamflow  
27 data for the three stations, the maximum peak flows at Carlisle, Alston, and Richtex stations  
28 were 123,000 cfs (3,483 m<sup>3</sup>/s) on October 10, 1976; 140,000 cfs (3,964 m<sup>3</sup>/s) on June 7, 1903;  
29 and 228,000 cfs (6,456 m<sup>3</sup>/s) on October 3, 1929, respectively (USGS 2024-TN10405, USGS  
30 2024-TN10406, USGS 2024-TN10407).

31 V.C. Summer has engineered and natural drainage systems to remove stormwater runoff from  
32 the site. However, the storm drain system for V.C. Summer is not credited to prevent flooding  
33 during a local intense precipitation event (Dominion 2023-TN10409). If the storm drain system  
34 became blocked or was not capable of fully discharging surface runoff, runoff would accumulate  
35 on the surface of the V.C. Summer site and flow toward topographic low points. Excess runoff  
36 from the power block area would flow toward the service water pond (SWP). Following the  
37 Fukushima accident, the NRC mandated additional reevaluation of the local intense  
38 precipitation flood hazards (NRC 2020-TN10401). Following the assessment, permanent  
39 modifications to enhance the protection of key plant structures, systems, and components were  
40 made. The assessment also evaluated flooding due to the combined storm surge and wind-  
41 induced wave run-up in Monticello Reservoir, and determined that key structures, systems, and  
42 components were not at risk from flooding from Monticello Reservoir (Dominion 2023-  
43 TN10387).



1  
 2 **Figure 3-3 Federal Emergency Management Agency Flood Hazard Designation for the**  
 3 **Virgil C. Summer Nuclear Station Site. Source: Dominion 2023-TN10387.**

4 The NRC staff evaluates nuclear power plant operating conditions and physical infrastructure to  
 5 ensure ongoing safe operations through its Reactor Oversight Process. If new information about  
 6 changing environmental conditions becomes available, the NRC staff will evaluate the new  
 7 information to determine whether any safety-related changes are needed.

8 **3.5.1.2 Surface Water Use Last 5 Years**

9 Surface water withdrawals for V.C. Summer are permitted under Surface Water Withdrawal  
 10 Permit No. 20PN001. The permit allows V.C. Summer to withdraw a maximum of  
 11 26,243.86 million gallons of surface water per month (MGM) (99.3 million m<sup>3</sup> per month) from  
 12 Monticello Reservoir via the circulating water intake structure and the OWS. The majority of

1 withdrawn water is used for condenser cooling. A small fraction of the withdrawals is used for  
 2 the service water system, potable water, Turbine Building cooling tower makeup water, and fire  
 3 protection. Recent surface water withdrawals for V.C. Summer are summarized in Table 3-6.  
 4 Over the 2019–2023 period, V.C. Summer withdrew an annual average of 249,835 million  
 5 gallons per year (MGY) or 684 MGD (946 million m<sup>3</sup> per year), with a maximum of 269,816 MGY  
 6 or 739 MGD (1,021 million m<sup>3</sup> per year) in 2019 and a minimum of 229,011 MGY or 630 MGD  
 7 (867 million m<sup>3</sup> per year) in 2021. Over the same 5-year period, monthly maximum and  
 8 minimum withdrawals were 22,918 MGM or 764 MGD (86.8 million m<sup>3</sup> per month) and  
 9 4,752 MGM or 158 MGD (18 million m<sup>3</sup> per month), respectively.

10 **Table 3-6 Surface Water Withdrawals for Virgil C. Summer Nuclear Station from the**  
 11 **Monticello Reservoir**

Year	Monthly Average (MGM)	Monthly Minimum (MGM)	Monthly Maximum (MGM)	Yearly Total (MGY)
2019	22,485	20,699	22,918	269,816
2020	19,785	8,202	22,915	237,424
2021	19,084	4,752	22,916	229,011
2022	22,122	19,496	22,917	265,465
2023	20,622	5,382	22,910	247,459

MGM = million gallon(s) per month; MGY = million gallon(s) per year.

All reported values are rounded.

Source: Dominion 2023-TN10387, Dominion 2024-TN10391.

12 Surface water is used downstream of Fairfield Pumped Storage Facility (the combined operation  
 13 of Parr and Monticello Reservoirs) for municipal and industrial supply. The largest downstream  
 14 user of surface water in the vicinity of V.C. Summer is the City of Columbia, using an estimated  
 15 23 MGD (87,100 m<sup>3</sup> per day) from the Broad River (Dominion 2023-TN10387). The V.C.  
 16 Summer withdrawals are from Monticello Reservoir, with makeup water obtained from Parr  
 17 Reservoir. Due to the operations of the Fairfield Pumped Storage Facility, the Parr Reservoir  
 18 has a daily average water level change of approximately 4 ft (1.2 m), and the Monticello  
 19 Reservoir could change up to 4.5 ft (1.4 m) daily (Dominion 2023-TN10387). Average natural  
 20 evaporation from Monticello Reservoir is estimated at 65 ac-ft per day (21.3 MGD), and an  
 21 additional average loss of 44 ac-ft per day (14.3 MGD) is estimated from evaporation of  
 22 condenser water (Dominion 2023-TN10387). Based on the reported evaporative loss estimate  
 23 of 14.3 MGD (54,100 m<sup>3</sup> per day) and average withdrawals of 684 MGD (2.6 million m<sup>3</sup> per  
 24 day), V.C. Summer consumes approximately 2 percent of the withdrawn water. Annual average  
 25 precipitation offsets a majority of the combined annual evaporative losses from Monticello  
 26 Reservoir (Dominion 2023-TN10387).

27 The SWP is a safety-class impoundment within a small arm of the Monticello Reservoir  
 28 (Dominion 2023-TN10387). The SWP is created by three earthen dams and the west site  
 29 embankment (Dominion 2023-TN10409). It supplies service water under normal and emergency  
 30 conditions. The service water system intake provides water from the SWP or the Monticello  
 31 Reservoir using an interconnecting pipe and an isolation valve (Dominion 2023-TN10409).  
 32 Under normal operating conditions, the water levels in Monticello Reservoir and the SWP vary  
 33 between 420.5 and 426 ft (128.2 and 129.8 m) MSL. At a water level of 425 ft (129.5 m) MSL,  
 34 the SWP contains 1,408 ac-ft (1.74 million m<sup>3</sup>) of water with a surface area of 41 ac (16.6 ha)  
 35 (Dominion 2023-TN10387).

1 3.5.1.3 Surface Water Quality and Effluents

2 Water Quality Assessment and Regulation

3 In accordance with Section 303(c) of the Federal Water Pollution Control Act (i.e., Clean Water  
4 Act of 1972, as amended [CWA; 33 U.S.C. 1251-1387-TN662]), States have the primary  
5 responsibility for establishing, reviewing, and revising water quality standards for the Nation's  
6 navigable waters. Such standards include the designated uses of a water body or water body  
7 segment, the water quality criteria necessary to protect those designated uses, and an anti-  
8 degradation policy with respect to ambient water quality. As established under Section 101(a) of  
9 the CWA, water quality standards are intended to restore and maintain the chemical, physical,  
10 and biological integrity of the Nation's waters and to attain a level of water quality that provides  
11 for designated uses. The EPA reviews each State's water quality standards to ensure that they  
12 meet the goals of the CWA and Federal water quality standards regulations (40 CFR Part 131-  
13 TN4814: Water Quality Standards).

14 Section 303(d) of the CWA requires States to identify all "impaired" waters for which effluent  
15 limitations and pollution control activities are not sufficient to attain water quality standards in  
16 such waters. Similarly, CWA Section 305(b) requires States to assess and report on the overall  
17 quality of waters in their state. States prepare a CWA Section 303(d) list that identifies the water  
18 quality limited water bodies that require the development of total maximum daily loads (TMDLs)  
19 to assure future compliance with water quality standards. The list also identifies the pollutant or  
20 stressor causing the impairment and establishes a priority for developing a control plan to  
21 address the impairment. The TMDLs specify the maximum amount of a pollutant that a water  
22 body can receive and still meet water quality standards. Once established, TMDLs are often  
23 implemented through watershed-based programs administered by the State, primarily through  
24 permits issued under the NPDES permit program, pursuant to Section 402 of the CWA, and  
25 associated point and nonpoint source water quality improvement plans and associated BMPs.  
26 States are required to update and resubmit their impaired waters list every 2 years, which  
27 assures that impaired waters continue to be monitored and assessed by the State until  
28 applicable water quality standards are met.

29 Under CWA Sections 305(b) and 303(d), South Carolina compiles an integrated report of  
30 surface water quality (SCDES 2024-TN10408).<sup>2</sup> South Carolina's 2022 assessment of surface  
31 water quality was partially approved by the EPA on December 28, 2022 (EPA 2022-TN10535).  
32 The Clean Water Act (CWA) Section 305(b) requires each State to report the condition of its  
33 surface water quality to the EPA every 2 years and Section 303(d) requires each State to report  
34 on its impaired water bodies (i.e., those not meeting water quality standards). A review of the  
35 2022 SCDHEC 303(d) list of impaired waters identified the following impaired waters in the  
36 vicinity of V.C. Summer:

- 37 • Broad River downstream of Parr Reservoir: copper
- 38 • Broad River upstream of Parr Reservoir: turbidity
- 39 • Parr Reservoir: *E. coli*, phosphorus at multiple locations
- 40 • Monticello Reservoir: pH at multiple locations

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<sup>2</sup> On July 1, 2024, the South Carolina Department of Health and Environmental Control (SCDHEC) was split into two agencies—the South Carolina Department of Environmental Services (SCDES) and the South Carolina Department of Public Health. The State's 303(d) list is now maintained and updated by SCDES' Bureau of Water.

1 The 2024 draft 303(d) list is currently available for public comment (SCDES 2024-TN10408).  
2 The impaired waters listed above are also listed on the 2024 draft 303(d) list. The only TMDL  
3 established in the vicinity of V.C. Summer is for fecal coliform at some Broad River locations.  
4 TMDLs for pH and total phosphorus are currently being developed for Monticello and Parr  
5 Reservoirs.

6 Currently, South Carolina's list of water quality impairment constituents does not include  
7 radionuclides (SCDES 2024-TN10408). A review of Annual Radiological Environmental  
8 Operating Reports (AREORs) from 2020 through 2024 for V.C Summer shows that all surface  
9 water samples collected for Monticello Reservoir were below the applicable lower limits of  
10 detection for tritium and gamma-emitting isotopes (Dominion 2020-TN10416, Dominion 2021-  
11 TN10417, Dominion 2022-TN10418, Dominion 2023-TN10419, and Dominion 2024-TN10420).

## 12 National Pollutant Discharge Eliminating System Permitting Status and Plant Effluents

13 To operate a nuclear power plant, NRC licensees must comply with the CWA, including  
14 associated requirements imposed by the EPA or the State, as part of the NPDES permitting  
15 system under Section 402 of the CWA. The Federal NPDES permit program addresses water  
16 pollution by regulating point sources (i.e., pipes, ditches) that discharge pollutants to waters of  
17 the United States. NRC licensees must also meet State water quality certification requirements  
18 under Section 401 of the CWA. The EPA or the States, not the NRC, sets the limits for effluents  
19 and operational parameters in plant specific NPDES permits. Nuclear power plants cannot  
20 operate without a valid NPDES permit and a current Section 401 Water Quality Certification.

21 Since June 10, 1975, the State of South Carolina has had the authority to administer the  
22 NPDES program (EPA 2024-TN10085). The State's regulations for administering the NPDES  
23 program are contained in the South Carolina Code of Regulations, specifically within SC  
24 Regulation 61-9 (SCDHEC 2019-TN9121). NPDES permits are typically issued on a 5-year  
25 renewal cycle. V.C. Summer operates under the current NPDES wastewater permit No.  
26 SC0030856. The current NPDES permit was issued on August 9, 2022, by the SCDHEC, and  
27 has a listed expiration of August 31, 2027 (Dominion 2023-TN10387). V.C. Summer's OWS  
28 operates under a general permit for water treatment plant discharges, Permit No. SCG646000,  
29 which has an expiration date of July 31, 2027 (Dominion 2023-TN10387).

30 V.C. Summer's current NPDES Permit No. SC0030856 authorizes monitored discharges from  
31 nine outfalls, including three external (Outfalls 001, 003, and 014) and six internal (Outfalls 004,  
32 005, 06A, 06B, 007, and 008), see Figure 3-4. External outfalls discharge directly to a surface  
33 water body or feature that connects directly to a water body, while internal outfalls are  
34 associated with flow from waste streams that are eventually discharged into an external outfall.  
35 External Outfalls 001 and 014 comprise the majority of external outfall discharge, with an  
36 estimated 24,955 MGM (94.5 million m<sup>3</sup> per month), while Outfall 003 is estimated to discharge  
37 0.16 MGM (Dominion 2023-TN10387). The six internal outfalls are related to non-cooling water  
38 discharges to the Monticello Reservoir and Broad River. The three external outfalls are related  
39 to non-contact cooling water, low volume waste, and non-chemical metal cleaning waste. The  
40 current NPDES permit for the OWS (currently Permit No. SCG646000, formerly Permit No.  
41 SCG646072 Version 3.2) authorizes effluent limitations for discharges to the Monticello  
42 Reservoir at Outfalls 01A, 01B, 01C, 02A, 02B, 02C, 03A, 03B, 03C, 04A, 04B, 04C, 05A, 05B,  
43 05C, 06A, 06B, 07A, 08A, 08B, and 09A (Dominion 2023-TN10387).



1  
 2 **Figure 3-4 Virgil C. Summer Nuclear Station Site National Pollutant Discharge**  
 3 **Elimination System Permitted Outfalls. Source: Dominion 2023-TN10387.**

4 The NPDES permits specific pollutant-specific effluent limits and outlines sampling requirements  
 5 for outfall effluents in order to ensure that discharges from V.C. Summer comply with applicable  
 6 water quality standards. Monitoring requirements for each outfall associated with Permit No.  
 7 SC0030856 are summarized in Table E3.6-2 of Dominion’s ER (Dominion 2023-TN10387).  
 8 Monitoring requirements for Permit No. SCG646000 are listed in the copy of the NPDES permit  
 9 provided in Appendix A to the ER associated with the V.C. Summer SLR (Dominion 2023-  
 10 TN10387). Parameters monitored under the NPDES permits (SC0030856 and SCG646000)  
 11 include outfall flow rates; intake and discharge temperatures; pH; total suspended solids; oil and  
 12 grease; *Ceriodaphnia dubia* toxicity; biochemical oxygen demand; *E. coli*; iron; copper; total  
 13 residual chlorine; and other constituents. Monitoring requirements and effluent limits vary by  
 14 outfall. Descriptions of the plant processes that contribute to each outfall along with outfall-  
 15 specific permit requirements are provided in Dominion’s ER Section E3.6.1.2.1 and  
 16 Table E3.6-2 (Dominion 2023-TN10387). V.C. Summer’s significant outfalls are described  
 17 below.

1 External Outfall 001 discharges non-contact cooling water and low volume waste from Internal  
2 Outfalls 004 and 007. Effluent from Outfall 001 is discharged into the Monticello Reservoir via  
3 the discharge canal (Figure 3-4). The discharge elevation is approximately 10 ft (3 m) below the  
4 maximum water level in Monticello Reservoir of 425 feet (129.5 m) MSL. There are no  
5 discharge rate limits for Outfall 001, but there are limits on pH (between 6.0 and 8.5 standard  
6 units [SU]) and temperature (daily maximum less than 113°F [45°C]). Numerical modeling  
7 studies of the thermal plume created by cooling water discharge were conducted as part of the  
8 2012 NPDES wastewater permit renewal application (No. SC0030856), and additional modeling  
9 was performed in 2014 at the request of the SCDHEC (Dominion 2023-TN10387). The  
10 modeling evaluated whether the maximum permitted cooling water discharge temperature of  
11 113°F (45°C) could adversely impact the thermal conditions of Monticello Reservoir. The  
12 modeling results supported maintaining the 113°F (45°C) discharge water temperature limit,  
13 which applies to the current 2022 NPDES permit (Dominion 2023-TN10387). There are no limits  
14 on the intake water temperature or the maximum difference between intake and discharge water  
15 temperatures. Figure 3-5 presents monthly average intake water temperatures from 2006 to  
16 2023 from Monticello Reservoir. There is no apparent trend over the 18-year period for monthly  
17 average intake water temperatures.

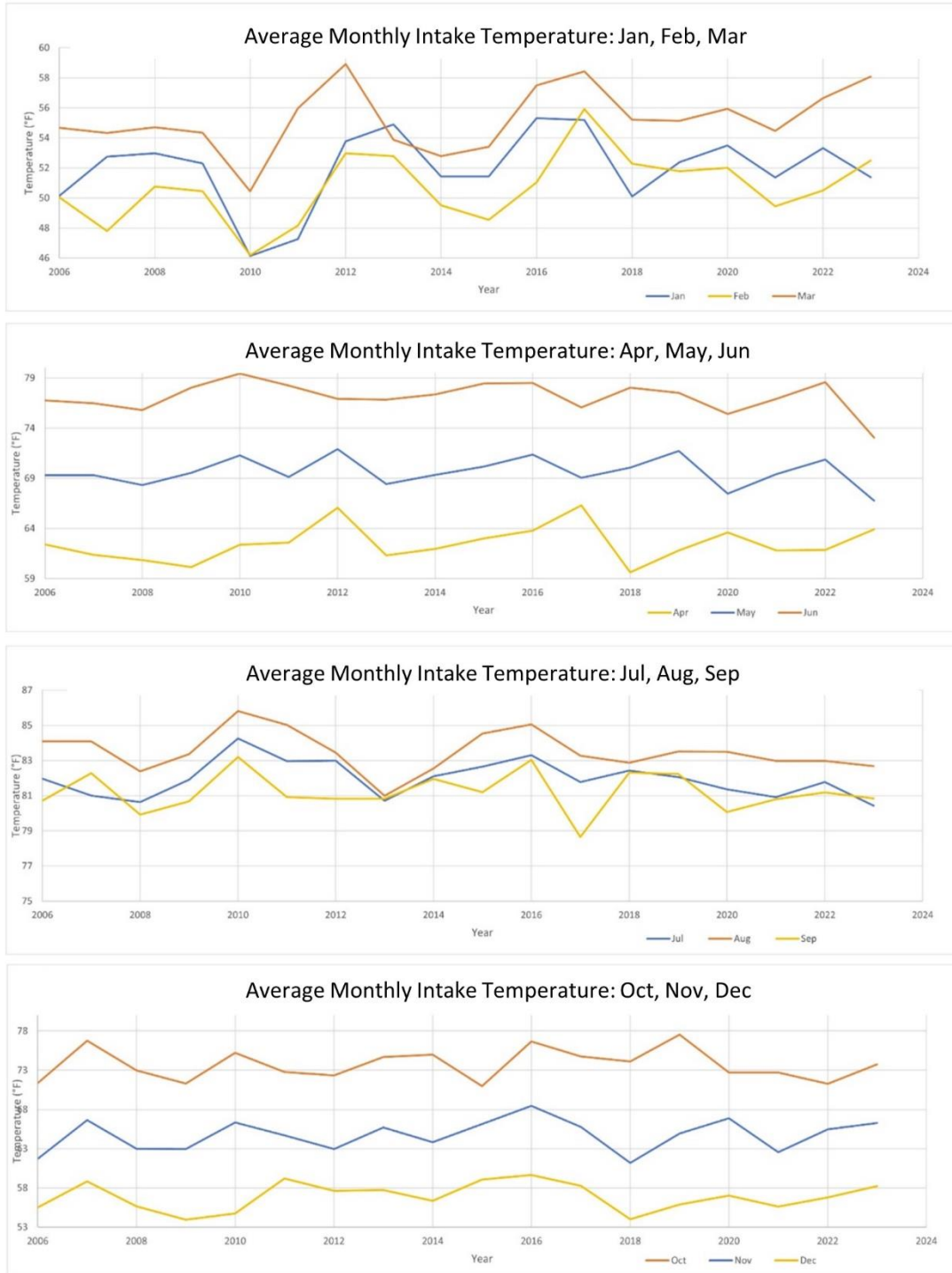
18 Discharge from External Outfall 003 consists of low volume metal cleaning waste. The receiving  
19 water body for Outfall 003 is the Broad River/Parr Reservoir. Outfall 003 is located 0.5 mi  
20 (0.8 km) from the northwest corner of the plant, where discharge is released into the penstocks  
21 of the Fairfield Pumped Storage Facility (Figure 3-4).

22 External Outfall 014 discharges the combined flows from Internal Outfalls 005, 06A, 06B, and  
23 008. Outfall 014 is collocated with Outfall 001 and, like Outfall 001, discharges to Monticello  
24 Reservoir via the discharge canal (Figure 3-4). There is no effluent limit for discharge rate from  
25 Outfall 014, but pH must be between 6.0–8.5 and there are monitoring and reporting  
26 requirements for whole effluent toxicity testing using *Ceriodaphnia dubia*.

27 For all monitored effluents, V.C. Summer submits discharge monitoring reports to the SCDHEC  
28 in accordance with the reporting schedule specified in the NPDES permits. The following  
29 exceedances and violations are those incidents that occurred over the 5 year reporting period  
30 between 2019 and 2023, and are associated with V.C. Summer wastewater discharges  
31 (Dominion 2023-TN10387, 2024-TN10391):

- 32 • An SCDHEC warning letter dated September 3, 2019, noted a missing mercury  
33 measurement for the 2019 Discharge Monitoring Report (DMR) associated with NPDES  
34 Permit No. SCG646072 (OWS system). V.C. Summer submitted a corrected DMR to  
35 SCDHEC on September 11, 2019.
- 36 • The SCDHEC issued a notice of violation (NOV) on May 25, 2021, for NPDES Permit No.  
37 SCG646072 (OWS system) for exceedances of daily maximum total suspended solids and  
38 missing reported total manganese monthly average and daily maximum. The SCDHEC did  
39 not require further action because explanations of the violations were provided by  
40 V.C. Summer.
- 41 • On May 24, 2021, SCDHEC issued violations for lapses of required periodic underground  
42 storage tank testing. V.C. Summer performed tests in October 2021 and February 2022 to  
43 satisfy the specified corrective actions. An email from SCDHEC on February 16, 2022,  
44 confirmed that V.C. Summer achieved compliance.





1  
 2 **Figure 3-5 Monthly Average Intake Water Temperatures from Monticello Reservoir for**  
 3 **Virgil C. Summer Nuclear Station, 2006–2023. Adapted from Request For**  
 4 **Additional Information Response: Dominion 2024-TN10391.**

- 1 • An NOV was issued by SCDHEC for NPDES Permit No. SCG646072 because reported total  
2 residual chlorine (TRC) analysis in DMRs over the June 2018 to July 2021 period was not  
3 conducted by a certified South Carolina laboratory. As a result, SCDHEC issued Consent  
4 Order 22-024-W on April 21, 2022. SCDHEC closed the consent order on May 5, 2022, and  
5 a letter from the SCDHEC on May 12, 2022, stated that the consent order requirements had  
6 been satisfied. Additionally, SCDHEC approved the laboratory certification application for  
7 TRC analysis on September 16, 2022.
- 8 • In December 2021, there was a reported exceedance of the maximum pH value for  
9 Outfall 014 associated with Permit No. SC0030856. The measured value was 8.8 SU, while  
10 the permitted range is 6.0–8.5 SU. V.C. Summer reported that the exceedance was due to  
11 cross-contamination from a sampling container and resampled the same day. The  
12 remeasured sample had a pH of 8.39 SU. Because this was the first reported pH  
13 exceedance in a 12-month period, SCDHEC did not issue an NOV.
- 14 • On April 6, 2022, SCDHEC issued V.C. Summer an NOV related to TRC for NPDES Permit  
15 No. SCG646072 (OWS system). The TRC exceedances occurred for Outfall 08A and  
16 included exceedances of the daily maximum and monthly average in January 2022.  
17 V.C. Summer provided a written response to the NOV on April 20, 2022. The response  
18 stated that the January exceedance was likely due to interference from oxidized  
19 manganese. To reduce the possibility of TRC exceedance, V.C. Summer implemented the  
20 following protocols: running aerators multiple days before discharging to lower residual  
21 chlorine concentrations and adding dechlorination tablets to the continuous chlorine  
22 monitoring system. In their response, V.C. Summer also noted that the basins had been  
23 sampled in January 2022 prior to releasing discharge via Outfall 08A and that neither  
24 sample exceeded the SCDHEC Practical Quantitation Limit of 0.05 mg/L for TRC. No  
25 releases occurred in February or March of 2022, and TRC in the April 2022 release was not  
26 detected.
- 27 • In March 2022, an exceedance associated with NPDES Permit No. SCG646072 (OWS  
28 system) for monthly average total suspended solid (TSS) at Outfall 06A was reported. The  
29 monthly limit of 30 mg/L was exceeded due to only a single measured value of 32.6 mg/L  
30 during the month. The daily maximum of 98 mg/L for TSS was not exceeded. V.C. Summer  
31 did not have any further correspondence from SCDHEC for this permit exceedance  
32 (Dominion 2024-TN10391).
- 33 • A monthly sample at the offsite water treatment facility was not collected in February 2023,  
34 resulting in a violation of NPDES Permit No. SCG646072 (Dominion 2024-TN10391). The  
35 parameters not sampled included effluent TRC, temperature, pH, TSS, total phosphorus,  
36 total iron, and total manganese. Following the discovery of the violation, grab samples were  
37 collected to verify that no abnormal indicators were present in the wastewater discharge.  
38 This violation was documented in V.C. Summer’s corrective action program, but the violation  
39 was not reportable.

40 Other Surface Water Resources Permits and Approvals

41 As stated earlier, NRC licensees must meet State water quality certification requirements under  
42 Section 401 of the CWA. Under the CWA, the NRC cannot issue a Federal permit or license  
43 unless the CWA Section 401 water quality certification has been issued or the water quality  
44 certification requirement has been waived by a State or another authorized agency. In  
45 preparation for the SLR application for Unit 1, Dominion requested a Section 401 waiver from  
46 SCDHEC in a June 22, 2022, letter. The SCDHEC approved the Section 401 waiver request in  
47 an August 4, 2022, letter (Dominion 2023-TN10387). Based on the staff’s review of this

1 correspondence and applicable regulatory requirements in effect at the time, the SCDHEC  
2 rendered its CWA Section 401 determination, and the staff has determined that no further action  
3 is required by the NRC as the responsible Federal licensing or permitting agency as related to  
4 the CWA Section 401 certification process.

5 Stormwater runoff from the V.C. Summer site is covered by the NPDES general stormwater  
6 permit for industrial activities (SCR000000, coverage No. SCR004134). Stormwater runoff from  
7 the site area covered by the general stormwater permit is collected by seven storm drain  
8 systems that discharge to small, unnamed tributaries of the Broad River and Mayo Creek, which  
9 subsequently drains into the Broad River. To mitigate contamination, stormwater runoff  
10 generated from plant areas with the highest potential of runoff contamination is routed to and  
11 treated at the waste treatment facility. The waste treatment facility operates under current  
12 NPDES Permit No. SC0030856. OWS outfalls that feed into retention ponds that discharge into  
13 Monticello Reservoir are authorized by current NPDES Permit No. SCG646000 (formerly Permit  
14 No. SCG646072 Version 3.2). The outfalls associated with the general stormwater permit are  
15 SW12, SW13, and SWSW. These permitted outfalls have no effluent limits. Dominion has  
16 implemented an SWPPP for these outfalls under the general industrial stormwater permit. The  
17 SWPPP identifies potential sources of pollution that would be reasonably expected to impact  
18 water quality of runoff and manages these with BMPs that prevent or reduce pollutants in  
19 stormwater discharge. V.C. Summer annually evaluates its stormwater management plan to:  
20 (1) inspect for potential pollutant sources, (2) identify stormwater and non-stormwater  
21 discharges previously not identified in the SWPPP, (3) identify potential pollutant hot spots, and  
22 (4) review the CWA 303(d) list of impaired waters and TMDLs (Dominion 2024-TN10391).  
23 V.C. Summer annually certifies its compliance with the NPDES general stormwater permit.

24 No dredging has occurred or is planned for the intake or discharge structures at V.C. Summer.  
25 Therefore, V.C. Summer does not have a CWA Section 404 permit. If dredging is required in the  
26 future, V.C. Summer must obtain the necessary permits.

27 V.C. Summer generates hazardous and non-hazardous waste and is classified as a large-  
28 quantity hazardous waste generator (Dominion 2023-TN10387). V.C. Summer maintains an  
29 SWPPP, a spill prevention control and countermeasures plan, and a hazardous waste  
30 contingency (HWC) Plan. The HWC Plan is reviewed and updated annually (Dominion 2024-  
31 TN10391). The HWC Plan was last revised in February 2024 and is scheduled for review in  
32 December 2024. The plan is immediately implemented if a threat to human health or the  
33 environment is likely from an unplanned release of hazardous materials or hazardous waste. If  
34 hazardous materials or hazardous waste from a spill migrate to the stormwater drainage  
35 system, a downstream location is identified where the stormwater flow could be blocked using  
36 dams, absorbents, or other impermeable material. The SCDES Bureau of Land and Waste  
37 Management Emergency Response Section is notified of reportable quantity releases to air,  
38 land, or water. The NRC is notified if the spill threatens human health or the environment  
39 outside the plant or if the spill containing Comprehensive Environmental Response,  
40 Compensation, and Liability Act substances reaches navigable waters. After a release event,  
41 recovered waste is treated, stored, or disposed of appropriately. The event is investigated to  
42 determine the cause, then corrective actions are taken, and the HWC Plan is amended, if  
43 necessary. No reportable spills occurred in the 2017–2021 period (Dominion 2023-TN10387) or  
44 between January 2022 and April 2024 (Dominion 2024-TN10391).

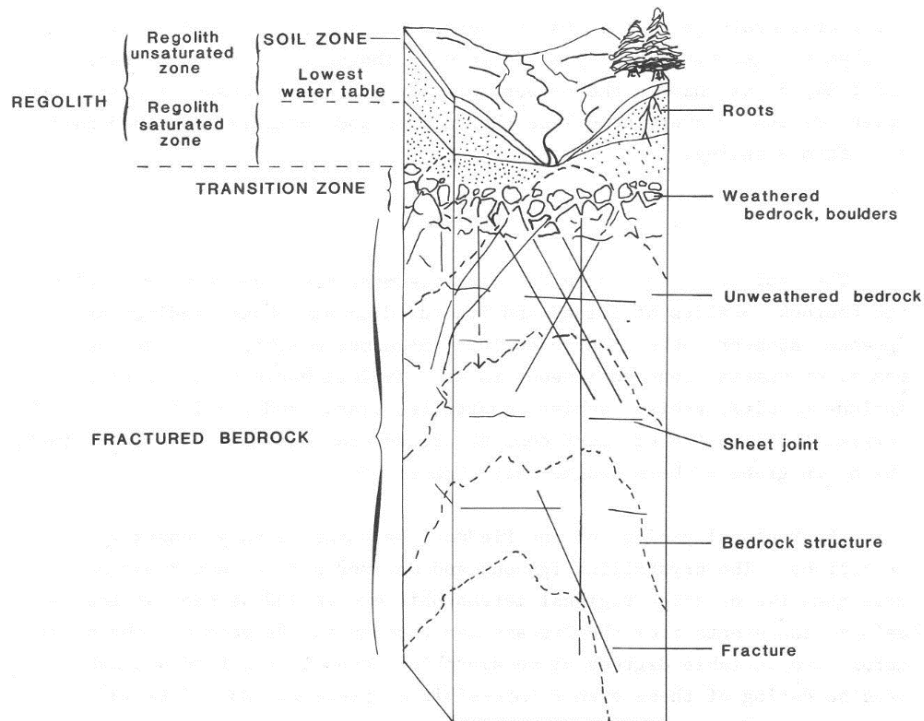
1 **3.5.2 Groundwater Resources**

2 This SEIS section describes the groundwater flow systems (aquifers) and groundwater quality in  
3 and around the V.C. Summer site. Aquifers are a geologic formation, a group of formations, or  
4 part of a formation that contain sufficient saturated, permeable material to yield significant  
5 quantities of water to wells and springs.

6 **3.5.2.1 Local and Regional Groundwater Resources**

7 Sections E3.5.2 and E3.6.2 of the applicant’s ER describe the regional geology and  
8 groundwater resources, respectively, in the vicinity of the V.C. Summer site (Dominion 2023-  
9 TN10387). The NRC staff also evaluated information related to groundwater resources during  
10 the site audit, scoping process, and review of other available information cited in this SEIS.

11 The site is located in the Piedmont physiographic province of South Carolina. Crystalline  
12 bedrock underlies the site and is weathered in-place to form an overburden of clayey, silty,  
13 sandy soils, referred to as saprolite. A transition zone of partially weathered bedrock is often  
14 present near the top of the bedrock, as shown in Figure 3-6 below (LeGrand 2004-TN9017;  
15 Harned and Daniel 1992-TN9019). Regolith is generally defined as the composition of surface  
16 soils, saprolite, and stream deposits overlying the fractured bedrock. The regolith and fractured  
17 bedrock together form the aquifer, with the higher porosity regolith providing most of the water  
18 storage which also transmits water to the underlying fractures in the low-porosity bedrock.  
19 Recharge to the saprolite and bedrock is predominantly by precipitation infiltrating the ground  
20 along ridges/upland areas. Groundwater is generally unconfined, and the water table (i.e., the  
21 upper surface of saturation) is typically a subdued representation of the ground surface  
22 topography.



23  
24 **Figure 3-6 Conceptual Components of the Piedmont and Mountains**  
25 **Groundwater System. Source: Harned and Daniel (1992-TN9019).**

1 At the V.C. Summer site, groundwater has been characterized within two zones—shallow  
2 groundwater that exists in the surface soils, fill, and saprolite, and deep groundwater that exists  
3 in the fractured crystalline bedrock (see Section 3.4.2 of this SEIS for a description of site  
4 geology). The two zones are hydraulically connected, and groundwater is typically encountered  
5 between 20 and 90 ft below ground surface (bgs) (6.1–27.4 m bgs) within the saprolite or fill  
6 materials (Dominion 2023-TN10387). The presence of discontinuous sand and gravel lenses is  
7 indicated by instances of perched groundwater at the site (Dominion 2024-TN10391).

8 Prior to construction of the Monticello Reservoir in 1978, groundwater flow from the site area  
9 was northeast toward Frees Creek and the Broad River (Dominion 2023-TN10409). Once the  
10 reservoir was constructed and filled, groundwater levels in the surrounding area increased, and  
11 the flow direction reversed. Flow paths in the shallow groundwater unaltered by site structures  
12 and the passive drainage system are now toward the south and southwest. Groundwater  
13 discharges to small tributaries of the Broad River, such as Mayo Creek (Dominion 2023-  
14 TN10387). Prior to the installation of the full dewatering system, the site calculated the linear  
15 horizontal groundwater velocity of the Zone I and II fill (0.07 ft/day [0.02 m/day]), Zone III fill  
16 (1.3 ft/day [0.40 m/day]), and saprolite (0.33 ft/day [0.10 m/day]).

17 Local post-construction groundwater conditions have been altered by the presence of a  
18 dewatering system within the V.C. Summer site footprint. Groundwater flow reversal and  
19 groundwater elevation rise following the impoundment of the reservoir resulted in persistent  
20 groundwater intrusion into some plant buildings at elevations below the water table (Dominion  
21 2023-TN10409). Following the completion of hydrogeologic investigations in the early 2000s, a  
22 non-safety dewatering system was installed in 2008 near the plant buildings subject to water  
23 intrusion issues. The dewatering system is comprised of 16 wells installed at elevations  
24 between 85 and 180 ft below ground surface and mainly surrounds the main reactor buildings  
25 (e.g., Unit 1, Turbine Building, Fuel Handling Building). Figure 3-7 displays the dewatering wells,  
26 current monitoring wells, and groundwater elevation data from August 2022 (Dominion 2023-  
27 TN10387). Figure 3-8 is a hydrogeological cross-section, oriented west to east, across the main  
28 plant area, which depicts four dewatering wells in red.

29 The rate of dewatering is controlled by pre-determined water elevation set points within the  
30 wells using submersible pumps, level transmitters, and controllers. Groundwater elevation in the  
31 dewatering wells is maintained between 402 to 372 ft (122.5 to 113.4 m) MSL, and the rate of  
32 dewatering is estimated to be approximately 70,000 gallons per day (gpd; 264,979 liters per day  
33 [lpd]) during steady-state flow. The dewatering system ultimately discharges to two stormwater  
34 outfalls; specifically, water from well DW-3 is discharged to IGP Outfall SW13, and water from  
35 the remaining wells is discharged to IGP Outfall SW12 (Dominion 2024-TN10391).

36 The NRC staff reviewed groundwater contour maps pre- and post-dewatering system  
37 implementation at the plant (Dominion 2024-TN10391). Although the exact rate of discharge  
38 from the system is unknown, the radius of influence of the dewatering system is likely to be  
39 within the plant boundaries based on groundwater elevation contour data. The dewatering  
40 system creates a local groundwater flow divide between groundwater captured by the  
41 underdrain system and groundwater that is not influenced by the underdrain system.  
42 Investigations at the site in 2009, following the installation of the system, found groundwater  
43 flow capture in all directions: south from Monticello Reservoir, west from the service water pond,  
44 and north and east from two areas of groundwater mounding (seen in Figure 3-7 as the areas  
45 surrounding wells B-36 and B-22). The areas of groundwater mounding anomalies at B-36 and  
46 B-22 are likely the result of perched groundwater, clogged screens, and/or underground springs  
47 (Dominion 2024-TN10391).

- 1 The EPA has not designated any sole source aquifers in the State of South Carolina or
- 2 adjoining the V.C. Summer site (EPA 2019-TN9022).



**Legend**

- ◆ Shallow Monitoring Well
- Intermediate Monitoring Well
- ◆ Deep Monitoring Well
- Dewatering Well
- ⊗ Destroyed
- Water Table Surface Contour
- Groundwater Flow Direction
- - - Protected Fence Area



0 100 200 Feet

3  
4 **Figure 3-7 Groundwater Contours, Dewatering Wells, and Monitoring Wells at the Virgil**  
5 **C. Summer Nuclear Station Site, August 2022. Source: Dominion 2023-**  
6 **TN10387.**

3-41

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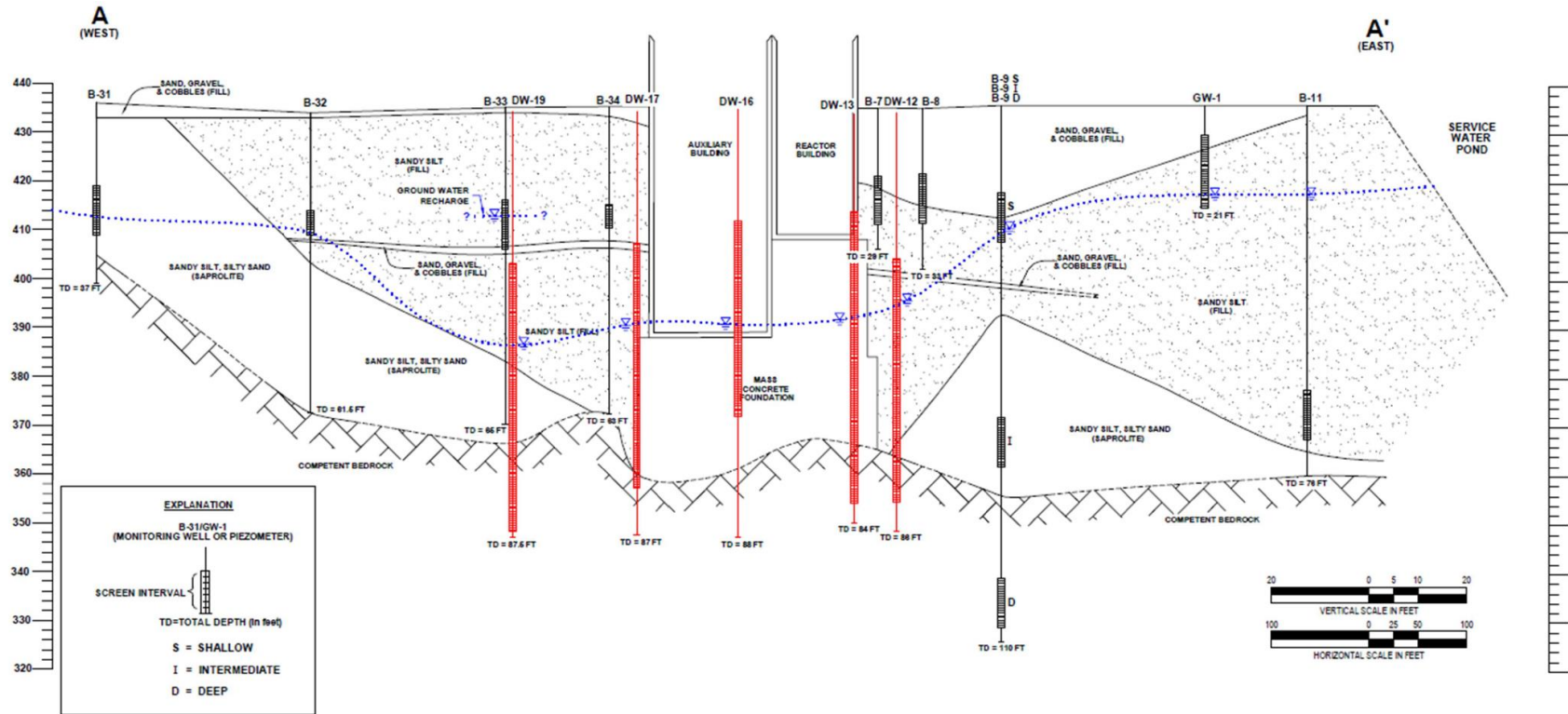


Figure 3-8 Hydrogeological Cross Section of Virgil C. Summer Nuclear Station Site. Source: Dominion 2023-TN10387.

1 3.5.2.2 *Local and Regional Water Consumption*

2 Counties within the Piedmont province in South Carolina largely rely on surface water for public  
3 supply, industry, agriculture, and power production. Not including power production, which is the  
4 largest user of surface water in the county, Fairfield County used approximately 1,200 million  
5 gallons of surface water and approximately 62 million gallons of groundwater in 2022 (SCDHEC  
6 2023-TN10410). Public groundwater supply was the primary use of groundwater in Fairfield  
7 County in 2022.

8 There are 41 domestic supply wells within a 2 mi (3.2 km) radius of the center point of the  
9 V.C. Summer site (Dominion 2023-TN10387). Most of the wells are located to the east of the  
10 plant, and reported well depths ranged from 65 to 365 ft (19.8–111.3 m). The Jenkinsville Water  
11 Supply Company Inc. sources drinking water from nine wells, three of which are located  
12 approximately 2 mi (3.2 km) northeast of the site center (SCE&G 2010-TN2024).

13 There is no onsite use of groundwater at the V.C. Summer plant. As discussed in  
14 Section 3.5.2.1 of this SEIS, there is an onsite dewatering system that became fully operational  
15 in 2008 to prevent water intrusion into building foundations. The system maintains groundwater  
16 elevations at a range within the design specifications, and it is estimated the system discharges  
17 a maximum of 70,000 gpd (264,979 lpd) to the stormwater system.

18 3.5.2.3 *Groundwater Quality*

19 Groundwater quality in the Piedmont region is generally good and within drinking water  
20 standards for most constituents (USGS 1990-TN6648). Groundwater constituents vary based  
21 on the dominant aquifer rock type in the Broad River subbasin in which Fairfield County is  
22 located. Total dissolved solids in the subbasin range from 8–658 milligrams per liter (mg/L), and  
23 pH ranges from 5.1 to 9.1. Radionuclides above drinking water standards have been detected in  
24 wells in Jenkinsville, which is located approximately 2.5 mi (4.0 km) southeast of the site  
25 (Wachob et al. 2009-TN9029).

26 Historical Radiological Spills and Tritium in Groundwater

27 *Groundwater Protection Program*

28 Based on the Industry Groundwater Protection Initiative (NEI 2019-TN6775), a groundwater  
29 protection program (GWPP) was implemented at the V.C. Summer site in 2009. The GWPP  
30 was recently reviewed to align with the Electric Power Research Institute (EPRI) Guideline for  
31 Implementing a Groundwater Protection Program at Nuclear Power Plants (Dominion 2023-  
32 TN10387; EPRI 2008-TN1961). Alignment included the addition of new groundwater monitoring  
33 wells. There are 21 onsite monitoring wells included as part of the GWPP (Dominion 2023-  
34 TN10387). The purpose of the GWPP is to ensure timely and effective management of  
35 inadvertent releases of licensed material to groundwater.

36 Monitoring wells under the GWPP target nine systems, structures, and components (SSCs).  
37 Table 3-7 lists the groundwater monitoring wells on site at V.C. Summer and the associated  
38 monitored location of SSCs. Monitoring wells are depicted in Figure 3-7.



1 **Table 3-7 Monitoring Wells, Sites, and Associated Locations with Systems,**  
 2 **Structures, and Components of the Virgil C. Summer Nuclear Station**

Monitoring Well/Site ID	Description of Monitored Location/SSCs
B-6	Upgradient / background
B-2S, B-36	SSC-1 <ul style="list-style-type: none"> <li>• Liquid radioactive waste</li> <li>• Discharge line between auxiliary building and penstock</li> <li>• Manhole 35</li> </ul>
DW-7	SSC-2 <ul style="list-style-type: none"> <li>• Condensate storage tank</li> </ul>
DW-2, DW-18, DW-19	SSC-3 <ul style="list-style-type: none"> <li>• Spent fuel</li> </ul>
GW-15A, GW-8A, GW-9, GW-12, GW-13A	SSC-4 <ul style="list-style-type: none"> <li>• Waste treatment facility settling ponds</li> <li>• Required monitoring as part of NPDES Permit No. SC0030856</li> </ul>
DW-13, DW-14, DW-15, DW-16, DW-17, DW-18	SSC-5 <ul style="list-style-type: none"> <li>• Fuel transfer tube joint penetration</li> </ul> SSC-6 <ul style="list-style-type: none"> <li>• Spent fuel pool liner</li> </ul>
Environmental Sites #27 and #122	SSC-7* <ul style="list-style-type: none"> <li>• Steam generator blow down</li> </ul>
B-22, B-23, B-26	SSC-8 <ul style="list-style-type: none"> <li>• Turbine Building sump and discharge line to waste treatment facility</li> </ul> SSC-9 <ul style="list-style-type: none"> <li>• Condensate backwash receiver tank discharge to waste treatment facility</li> </ul>

SSC = system, structure, and component.

\*The steam generator blow down (SSC-7) is not directly monitored by a groundwater monitoring well. Two surveillance monitoring sites (i.e., environmental sites #27 and #122) monitor this SSC by proximity (Dominion 2024-TN10391).

3 The GWPP includes quarterly monitoring for tritium and gamma isotopes. If gamma and tritium  
 4 activity is detected above lower limits of detection and above the maximum contaminant level  
 5 (MCL) (20,000 picocuries per liter [pCi/L]), respectively, analysis for hard to detect radionuclides  
 6 is also performed. Reporting levels provided in the Offsite Dose Calculation Manual (ODCM) are  
 7 used as notification criteria for environmental samples (Dominion 2024-TN10391). The reporting  
 8 level for tritium in water samples is 20,000 pCi/L.

9 In addition to the GWPP, V.C. Summer implements a Radiological Environmental Surveillance  
 10 Program and a Supplemental Radiological Environmental Surveillance Program. The  
 11 supplemental program is used to evaluate and modify the ODCM as needed. Six additional  
 12 wells (namely, DW-3, GW-16, P2, P5, environmental lab garden, old nuclear training center) are  
 13 not included in the GWPP but are monitored quarterly for gamma isotopic and tritium analysis.

14 *Dewatering System Groundwater Discharge*

15 The onsite dewatering system is described in Section 3.5.2 of this SEIS, and dewatering well  
 16 locations are shown in Figure 3-7. The dewatering system discharges to the local stormwater  
 17 drainage system via Outfalls SW12 and SW13. Potential releases from SSCs within the power  
 18 block area will be captured by the dewatering system. Water samples are collected from

1 Outfalls SW12 and SW13 daily. A monthly composite sample is analyzed for gamma isotopes,  
 2 and a quarterly composite sample is analyzed for tritium as part of the Supplemental  
 3 Radiological Environmental Monitoring Program. The results of this sampling are summarized in  
 4 the AREORs and are reported as locations 72 (SW12) and 73 (SW13). The analytical results  
 5 are voluntarily included in the “Radiological Environmental Monitoring Program Summary” table  
 6 for surface water. Tritium and gamma results between January 2018 and December 2023 for  
 7 locations 72 and 73 were all below lower limits of detection (Dominion 2024-TN10391). Plant-  
 8 specific procedures secure the dewatering pumps if groundwater contamination is detected  
 9 (Dominion 2023-TN10409).

10 *Radiological Releases*

11 Annual Radiological Effluent Release Reports are submitted to the NRC (as required by 10 CFR  
 12 50.36a TN249) in order to report the quantities of radionuclides released from liquid and  
 13 gaseous effluents as well as the results of groundwater monitoring under the GWPP (2020–  
 14 2024 Annual Radiological Effluent Release Reports: Dominion 2020-TN10411, Dominion 2021-  
 15 TN10412, Dominion 2022-TN10413, Dominion 2023-TN10414, and Dominion 2024-TN10415).  
 16 The NRC staff reviewed 5 years of available radiological release reports (2019–2023 monitoring  
 17 results), in addition to radiological environmental monitoring program results, including  
 18 supplemental data, provided in AREORs (2020–2024 AREORs: Dominion 2020-TN10416,  
 19 Dominion 2021-TN10417, Dominion 2022-TN10418, Dominion 2023-TN10419, and Dominion  
 20 2024-TN10420). Table 3-8 below summarizes recent detections of radiological contamination in  
 21 groundwater. Where multi-year trends of contamination were identified, the applicable AREORs  
 22 were reviewed to capture the entirety of a detection event (i.e., 2018 and 2019 AREORs:  
 23 SCE&G 2018-TN10421, SCE&G 2019-TN10422).

24 **Table 3-8 Recent Radiological Contamination from Virgil C. Summer Nuclear Station**  
 25 **Identified in Onsite Groundwater**

Date of Detection	Location	Description of Contamination Detected	Potential Source
Quarterly samples from 2017–2023	GW-16 (NPDES well) near sanitary and wastewater treatment facility	Tritium concentrations detected between 805 pCi/L (2022) and 2,800 pCi/L (2020) (Dominion 2021-TN10417, Dominion 2023-TN10419)	Historical leak from the Turbine Building sump (Dominion 2023-TN10387)
One quarterly sample in 2019	GW-13A (NPDES well) near sanitary and wastewater treatment facility	Tritium detected at 341 pCi/L (Dominion 2020-TN10416)	Historical leak from the Turbine Building sump (Dominion 2023-TN10387)
Quarterly samples between 2018–2019	DW-14, DW-15, DW-16 (dewatering wells) in the north power block area	Tritium detected in DW-15 in May 2018 at 6,230 pCi/L. Tritium detected in nearby wells DW-14 and DW-16 in 2018 at concentrations of 1,330 pCi/L and 1,290 pCi/L, respectively. (SCE&G 2019-TN10422). Last tritium detection among the three dewatering wells occurred in 2019 at a maximum concentration of 3,140 pCi/L (DW-15). (Dominion 2020-TN10416)	No specific source identified, though a potential source is a backflow event from the radioactive waste pad trench located north of the Fuel Handling Building following contamination of the trench from use of a hose that was stored near a tritiated source

NPDES = National Pollutant Discharge Elimination System.

1 None of the tritium detections described in Table 3-8 resulted in an exceedance of the MCL for  
2 tritium in drinking water (i.e., 20,000 pCi/L), nor did they exceed site reporting requirements. The  
3 ongoing tritium detections in GW-16 and GW-13A do not indicate an increasing trend but are  
4 likely due to low level radioactivity contained in the Turbine Building sump, which discharges to  
5 the sanitary waste collection sump. Groundwater in this area and pond water that infiltrates into  
6 groundwater will likely flow south toward Mayo Creek, based on groundwater elevation and flow  
7 path data, as described in Section 3.5.2.1 of this SEIS. Groundwater is not used as a source of  
8 drinking water in this area, and any release of tritium to surface water will be further diluted  
9 below the MCL.

10 In 2018 and 2019, tritium detected in dewatering wells DW-14, DW-15, and DW-16 discharged  
11 to the stormwater drainage system. All monthly composite samples collected from the  
12 stormwater drainage system from 2018–2019 measured below the limit of detection for tritium  
13 (SCE&G 2019-TN10422 and Dominion 2020-TN10416).

14 In 2019 and 2020, tritium was detected in an offsite monitoring location. Columbia Water Works  
15 (Radiological Environmental Monitoring Program [REMP] sample location 17) detected tritium in  
16 three samples at a maximum concentration of 935 pCi/L in 2020 (Dominion 2020-TN10416,  
17 Dominion 2021-TN10417). Although a source of the tritium was not reported, the concentration  
18 is much less than the MCL for tritium in drinking water (20,000 pCi/L), and the anticipated dose  
19 for the maximum recorded concentration is within permitted values per 10 CFR Part 20-TN283,  
20 as described Section 3.13 of this SEIS.

21 Dominion did not report any unplanned or inadvertent releases of radioactive material from  
22 January 2017–April 2024 (Dominion 2023-TN10387, Dominion 2024-TN10391).

### 23 Nonradiological Spills

24 In addition to radiological monitoring programs, groundwater monitoring is also required in the  
25 area of the auxiliary boiler fuel oil storage tank due to a release of No. 2 fuel oil in 1978  
26 (Dominion 2023-TN10387). Dominion reports that the historical spill has resulted in ongoing  
27 contamination in wells GW-3 and GW-4. Free-phase product has been consistently measured in  
28 GW-3, so groundwater sampling efforts are concentrated on GW-2 (downgradient of the source)  
29 and GW-4 (upgradient of the source). Sampled constituents (i.e., benzene, toluene,  
30 ethylbenzene, xylenes, naphthalene, benzo(a)anthracene, benzo(b)fluoranthene,  
31 benzo(k)fluoranthene, chrysene, and dibenzo(a,h)anthracene) have not been detected above  
32 respective MCLs in downgradient well GW-2. The extent of the impacted groundwater is likely  
33 contained within the GW-3 and GW-4 based on the lack of contamination in down-gradient wells  
34 (Dominion 2023-TN10387).

35 In addition to the historical release in the auxiliary boiler fuel oil storage tank area, there have  
36 been three inadvertent releases of nonradioactive materials from January 2019–April 2024  
37 (Dominion 2023-TN10387, Dominion 2024-TN10391). Only one of the releases resulted in an  
38 exceedance of reporting criteria. On November 16, 2021, mineral oil mixed with a large amount  
39 of water from a main transformer suppression system surpassed the capacity of the plant's  
40 oil/water separator. The separator sump ultimately discharged to NPDES Outfall 014, which  
41 released approximately 50 gallons of mineral oil into Monticello Reservoir. Dominion reports that  
42 the oil was contained with booms and remediated (Dominion 2023-TN10387).

43 There are no ongoing remediation activities associated with nonradiological releases at the  
44 V.C. Summer site. The site utilizes several site-specific procedures and BMPs to minimize the  
45 potential for a chemical release to the environment, including a spill prevention control and

1 countermeasures plan, hazardous waste contingency plan, hazardous waste management plan,  
2 and chemical control procedure (Dominion 2023-TN10387).

### 3 **3.5.3 Proposed Action**

#### 4 *3.5.3.1 Surface Water Resources*

5 As documented in the 2024 LR GEIS (NRC 2024-TN10161) and cited in Table 3-1 for generic  
6 surface water resources issues, the impacts of nuclear power plant SLR and continued  
7 operations would be SMALL for Category 1 issues applicable to V.C. Summer. The NRC staff's  
8 review did not identify any new and significant information that would change the conclusion in  
9 the 2024 LR GEIS. This includes a review of the exceedances and violations related to  
10 V.C. Summer's NPDES permit. The NRC staff does not consider the impact of these  
11 exceedances and violations to be significant because they were resolved to the satisfaction of  
12 SCDHEC upon appropriate actions taken by V.C. Summer. Thus, as concluded in the 2024 LR  
13 GEIS, for these Category 1 (generic) issues, the impacts of continued operation of V.C.  
14 Summer on surface water resources would be SMALL.

15 The 2024 LR GEIS lists one Category 2 issue for surface water resources—surface water use  
16 conflicts (plants with cooling ponds or cooling towers using makeup water from a river) (NRC  
17 2024-TN10161). V.C. Summer uses the Monticello Reservoir as its cooling pond, and the  
18 makeup water for the cooling pond is obtained from Broad River/Parr Reservoir (Dominion  
19 2023-TN10387). Because of the operation of the Fairfield Pumped Storage Facility that uses the  
20 Parr Reservoir as the lower water storage reservoir and uses the Monticello Reservoir as the  
21 upper water storage reservoir, daily water levels in Monticello Reservoir can change as much as  
22 4.5 ft (1.4 m) (Dominion 2023-TN10387). The daily average fluctuation in Parr Reservoir's water  
23 level is approximately 4 ft (1.2 m), with daily fluctuations reaching up to 10 ft (3 m). Total  
24 evaporation from Monticello Reservoir is estimated as 55 cfs (1.6 m<sup>3</sup>/s), with 33 cfs (0.9 m<sup>3</sup>/s) of  
25 natural evaporation during normal operations of V.C. Summer, and an additional 22 cfs  
26 (0.6 m<sup>3</sup>/s) of induced evaporation from the discharged condenser water (Dominion 2023-  
27 TN10387). Evaporative losses from the Monticello Reservoir are made up by precipitation and  
28 water pumped from the Parr Reservoir/Broad River.

29 Based on streamflow measurement from 1938–2023, the discharge at Carlisle station, which is  
30 located 24.6 mi (39.6 km) upstream of Parr Dam, has a mean monthly discharge of 2,738 cfs  
31 (77.5 m<sup>3</sup>/s) during periods of typically lower flow (i.e., June–November) (USGS 2024-TN10425).  
32 During the rest of the year, the mean monthly discharge is 4,752 cfs (134.6 m<sup>3</sup>/s) (USGS 2024-  
33 TN10425). For the same period of record, the minimum mean daily discharge at Carlisle station  
34 was 44 cfs (1.2 m<sup>3</sup>/s) for the months of June through November, and 192 cfs (5.4 m<sup>3</sup>/s) during  
35 the remaining months (USGS 2024-TN10426). The corresponding minimum and 5th percentile  
36 flows are 302 cfs (8.6 m<sup>3</sup>/s) and 778 cfs (22 m<sup>3</sup>/s), respectively (USGS 2024-TN10427). These  
37 data indicate that while very low-flow days are possible on Broad River, the streamflow quickly  
38 recovers. The estimated total evaporation of 55 cfs (1.6 m<sup>3</sup>/s) from the Monticello Reservoir is  
39 approximately 2 percent of mean monthly available flow during June through November, and  
40 1.2 percent of mean monthly flow during the rest of the year. These calculated percent-of-low  
41 values are conservative, as they neglect direct precipitation onto Monticello Reservoir which, on  
42 a mean annual basis, offsets a majority of the combined annual evaporative losses from the  
43 reservoir (Dominion 2023-TN10387). As part of its relicensing in 2020, the Federal Energy  
44 Regulatory Commission (FERC) requires the Parr Hydroelectric Project be operated, including  
45 minimum flow, in accordance with an Adaptive Management Plan (FERC 2020-TN10536).

1 Based on the above analysis, the NRC staff concluded that the impacts of continued operation  
2 of V.C. Summer during the SLR term on regional surface water use conflicts would be SMALL.

### 3 3.5.3.2 Groundwater Resources

4 As documented in the 2024 LR GEIS (NRC 2024-TN10161) and cited in Table 3-1 for generic  
5 groundwater resources issues, the impacts of nuclear power plant SLR and continued  
6 operations would be SMALL for Category 1 issues applicable to V.C. Summer. These issues  
7 are:

- 8 • groundwater contamination and use (non-cooling system impacts)
- 9 • groundwater use conflicts (plants that withdraw less than 100 gpm)

10 These applicable Category 1 issues were determined to result in a SMALL impact in 10 CFR  
11 Part 51 (10 CFR Part 51-TN10253), Subpart A, Appendix B, Table B-1. No significant  
12 groundwater impacts with respect to Category 1 (generic) issues are anticipated during the SLR  
13 term that would be different from those occurring during the current license term. As discussed  
14 in Section 3.5.2 of this SEIS, the NRC staff performed a review of groundwater use and quality.  
15 This review, including the independent review of the ER, the scoping process, the audit, and  
16 evaluation of available information, did not identify any new and significant information that  
17 would change the conclusion reached in the LR GEIS. The NRC staff concluded the following:

- 18 • No discharges to groundwater requiring permits by regulatory agencies are expected during  
19 the renewal period. There are currently no regulated discharges to groundwater, and none  
20 were identified by the applicant to likely occur during the renewal period.
- 21 • There are no foreseeable conditions during the renewal term under which onsite  
22 groundwater withdrawals increase to near or above the 100 gpm limit included in the  
23 LR GEIS conclusion.

24 As a result, and as concluded in the LR GEIS (NRC 2024-TN10161) for these Category 1  
25 (generic) issues that are reported in Table 3-1, the impacts on groundwater resources of  
26 continued operation of V.C. Summer would be SMALL.

27 Staff concluded groundwater quality degradation resulting from water withdrawals, a Category 1  
28 issue documented in the 2024 LE GEIS (NRC 2024-TN10161), is not applicable to V.C.  
29 Summer. Groundwater is not currently used for operations at V.C. Summer, and dewatering  
30 rates, coupled with the hydraulic setting of the plant, would not result in the type of groundwater  
31 degradation discussed in the LR GEIS.

32 As shown in Table 3-2, the NRC staff identified three plant-specific Category 2 issues related to  
33 groundwater resources applicable to V.C. Summer during the SLR term. These Category 2  
34 issues are analyzed below.

#### 35 Groundwater Use Conflicts (Plants with Closed-Cycle Cooling Systems That Withdraw Makeup 36 Water from a River)

37 As described in Section 2.1.3 of this SEIS, V.C. Summer uses once-through cooling that  
38 withdraws from, and discharges to, a cooling pond, the Monticello Reservoir. This is a case  
39 where a plant uses a cooling pond that functions as a closed-cycle system, as described in the  
40 LR GEIS (NRC 2024-TN10161). The Parr Reservoir (an impoundment of the Broad River) is the  
41 source of makeup water for the Monticello Reservoir (to replace evaporative losses from the use  
42 of the reservoir for plant cooling). Consumptive use of water from the Broad River (for makeup),

1 if significant enough to lower river water levels and affect water levels in the adjacent aquifer,  
2 could result in groundwater use conflicts, especially during low-flow conditions. The 2024  
3 LR GEIS (NRC 2024-TN10161) determined that the significance of impacts would depend on  
4 makeup water requirements, water availability, and competing water demands, and therefore  
5 the impact could be SMALL, MODERATE, or potentially LARGE during the SLR term.

6 Section 3.5.3.1 of this SEIS describes the evaporative loss of the Monticello Reservoir due to  
7 plant operations and the flow conditions of the Broad River entering the Parr Reservoir. The  
8 estimated induced evaporation of 22 cfs (0.6 m<sup>3</sup>/s) from the Monticello Reservoir is  
9 approximately 0.8 percent of mean monthly flow from the Broad River during the low-flow  
10 months of June through November, and 0.5 percent of mean monthly flow available during the  
11 rest of the year. Because the plant's makeup water use is a small fraction of the average flow in  
12 the Broad River, the effect on river levels is likely to be negligible. Groundwater use in the  
13 vicinity of the plant is not expected to increase significantly during the SLR term, and it is  
14 unlikely that makeup water taken from the Parr Reservoir or Broad River would impact offsite  
15 groundwater users. Therefore, the NRC staff conclude that the impacts of continued operation  
16 of V.C. Summer during the SLR term on groundwater use conflicts would be SMALL.

#### 17 Groundwater Degradation (Plants with Cooling Ponds)

18 According the LR GEIS (NRC 2024-TN10161), this issue combines two issues from the 2013  
19 LR GEIS (NRC 2013-TN4007) which both considered the possibility of groundwater quality  
20 becoming degraded as a result of the migration of contaminants discharged to cooling ponds.  
21 As described in Section 3.5.1.3, V.C. Summer discharges heated cooling water effluent and  
22 small volumes of wastewater (which are monitored according to the site's NPDES permit) back  
23 to Monticello Reservoir. Water quality of the reservoir is controlled and assessed by multiple  
24 programs, including Sections 303(b) and 303(d) of the CWA, NPDES (Permit No.  
25 SC00305856), and the REMP. In 2020 and 2022, Monticello Reservoir was classified as  
26 "impaired" by SCDHEC for pH only. Additionally, tritium and gamma-emitting isotopes have not  
27 been detected above lower limits of detection in the past 5 years. V.C. Summer implements  
28 site-specific procedures for reducing the potential for onsite spills to impact offsite resources  
29 (e.g., SWPP, spill prevention control and countermeasures plan) and utilizes BMPs to prevent  
30 or reduce pollutant discharges. NRC staff therefore concludes that the impacts of continued  
31 operation of V.C. Summer during the SLR term on groundwater degradation from cooling pond  
32 operation would be SMALL.

#### 33 Radionuclides Released to Groundwater

34 This issue was added for consideration as part of the groundwater review for LR in the  
35 LR GEIS, Revision 1 (NRC 2013-TN2654) and retained in Revision 2 (NRC 2024-TN10161)  
36 because of the accidental releases of liquids containing radioactive material into the  
37 groundwater at power reactor sites. The types of inadvertent releases reported have included,  
38 but have not been limited to, leakage from spent fuel pools, storage tanks, buried piping, failed  
39 pressure relief valves on an effluent discharge line, and other nuclear power plant equipment. In  
40 2006, the NRC released a report titled, "Liquid Radioactive Release Lessons Learned Task  
41 Force Report," documenting lessons learned from a review of these incidents that ultimately  
42 concluded that these instances had not adversely affected public health and safety (NRC 2006-  
43 TN1000). This report concluded, in general, that groundwater affected by radionuclide releases  
44 is expected to remain onsite, but instances of offsite migration have occurred. The LR GEIS  
45 (NRC 2024-TN10161) determined that impacts on groundwater quality from the release of  
46 radionuclides could be SMALL or MODERATE during the SLR term, depending on the  
47 magnitude of the leak, the radionuclides involved and concentrations, hydrogeologic factors,

1 distance to receptors, and the response time of plant personnel to identify and stop the leak in a  
2 timely fashion. As a result, this is a Category 2 issue requiring a plant-specific evaluation that is  
3 discussed below.

4 This issue was discussed in Sections E3.6.4.2 and E3.6.4.2.1 of Dominion's ER (Dominion  
5 2023-TN10387). V.C. Summer monitors groundwater for inadvertent releases as part of its  
6 GWPP, which was implemented under Nuclear Energy Institute (NEI) 07-07 (NEI 2007-TN1913)  
7 to satisfy requirements of 10 CFR 20.1501 (TN283) and is aligned with EPRI guidance. The site  
8 additionally implements a Radiological Environmental Surveillance Program and a  
9 Supplemental Radiological Surveillance Program. Tritium is the only radionuclide that has been  
10 historically detected in onsite groundwater above the minimum detectable limits but below the  
11 MCL of 20,000 pCi/L. Potential releases of radiological effluent within the groundwater divide  
12 created by the onsite dewatering system would be monitored and detected by onsite  
13 groundwater wells and by two stormwater drainage outfalls. From 2019–2023, tritium has not  
14 been detected in the composite stormwater drainage outfall samples. Outside of the influence of  
15 the dewatering system, potential releases of radiological effluent would likely flow to the south  
16 toward Mayo Creek and Broad River. Onsite detections of tritium near the sanitary and  
17 wastewater treatment facility are below the MCL (20,000 pCi/L) and do not indicate an  
18 increasing trend in concentration.

19 While tritium has been detected in onsite groundwater, levels do not exceed the EPA's MCL for  
20 tritium, and groundwater is not used as a source of drinking water at V.C. Summer. The site has  
21 implemented a groundwater protection program to identify and monitor leaks through the  
22 installed monitoring well network. With the robust sampling strategy at V.C. Summer, potential  
23 future releases of tritium into the groundwater would be readily detected. Therefore, the NRC  
24 staff concludes that the impacts on groundwater use and quality related to the inadvertent  
25 release of radionuclides to groundwater during the SLR term would be SMALL.

## 26 **3.5.4 No-Action Alternative**

### 27 *3.5.4.1 Surface Water Resources*

28 Under the no-action alternative, the NRC would not issue a subsequent renewed operating  
29 license for V.C. Summer, and reactor power generating operations would cease at the end of  
30 the current license term. With the cessation of operations, there would be a large reduction in  
31 the amount of water withdrawn from Monticello Reservoir. Wastewater discharges would also  
32 greatly decrease. Stormwater runoff would continue to be discharged from the site. As a result,  
33 V.C. Summer shutdown would reduce the overall impacts on surface water use and quality.  
34 Therefore, the NRC staff concludes that the impact of the no-action alternative on surface water  
35 resources would be SMALL.

### 36 *3.5.4.2 Groundwater Resources*

37 With the cessation of operations, there would be little or no additional impact on groundwater  
38 quality. Contamination in onsite soil and groundwater, including tritium, would be assessed  
39 during decommissioning, whether the plant is decommissioned at the end of the current  
40 licensing period or at the end of the SLR period. A license termination plan will describe actions  
41 needed for site remediation to meet the NRC criteria for radiologic dose and site-specific  
42 cleanup criteria to be met before release of the V.C. Summer site. Consequently, the NRC staff  
43 concludes that the impact of the no-action alternative on groundwater resources would be  
44 SMALL.

1 **3.5.5 Replacement Power Alternatives: Common Impacts**

2 3.5.5.1 *Surface Water Resources*

3 Construction

4 Construction activities associated with replacement power alternatives may cause temporary  
5 impacts on surface water quality by increasing sediment loading to water bodies and  
6 waterways. Construction of intake and discharge structures, if needed, could result in within-  
7 water activities including dredge-and-fill, underwater construction, and tunneling. Construction  
8 activities might also affect surface water quality through pollutants in stormwater runoff from  
9 disturbed areas and excavations, spills, and leaks from construction equipment, and from  
10 sediment and other pollutants disturbed due to associated dredge-and-fill activities. These  
11 pollutants could be detrimental to downstream surface water quality, where applicable, and to  
12 ambient water quality in waterways near work sites.

13 Facility construction activities might alter surface water drainage features within the construction  
14 footprints of replacement power facilities, including any wetland areas. Impervious areas may  
15 increase, resulting in a potential for greater and quicker surface runoff. Potential hydrologic  
16 impacts would vary depending on the nature and acreage of the land area disturbed and the  
17 intensity of excavation work. Changes in stormwater runoff volume, timing, and quality are  
18 usually controlled and managed with applicable Federal, State, and local permits and  
19 implementation of BMPs.

20 The NRC staff assumes that construction contractors would implement BMPs for soil erosion  
21 and sediment control to minimize water quality impacts in accordance with applicable Federal,  
22 State, and local permitting requirements. These measures would include spill prevention and  
23 response procedures, such as measures to avoid and respond to spills and leaks of fuels and  
24 other materials from construction equipment and activities. Surface water use during  
25 construction is generally related to concrete preparation, dust suppression, and potable and  
26 sanitary water for the workforce and is limited to the construction duration. These water needs  
27 are usually small compared to cooling water needs during thermoelectric plant operation.

28 Operation

29 Thermoelectric generation, a component of all four replacement power alternatives considered,  
30 may require varying amounts of surface water for the cooling of plant components depending on  
31 the selected cooling technology and, therefore, may require new water use permits from and  
32 agreements with State and local agencies. Potable and sanitary water use for the plant would  
33 depend on the workforce size and, therefore, may also require new potable water use permits  
34 from and sanitary water disposal agreements with local agencies or municipalities.

35 Discharge of wastewater including cooling system discharges would require permits from  
36 Federal, State, and local agencies, including a certification that the discharges are consistent  
37 with State water quality standards. Wastewater discharges would be subject to treatment and  
38 monitoring and the reporting requirements of relevant permitting agencies. The NRC staff  
39 assumes that plant operations would follow the requirements of any applicable Federal, State,  
40 and local permits.



1 3.5.5.2 *Groundwater Resources*

2 Construction

3 Excavation dewatering for foundations and substructures during construction of power  
4 generation facilities, as applicable, may be required to stabilize slopes and permit placement of  
5 foundations and substructures below the water table. Groundwater levels in the immediate area  
6 surrounding an excavation may be temporarily affected, depending on the duration of  
7 dewatering and the methods (e.g., cofferdams, sheet piling, sumps, and dewatering wells) used  
8 for dewatering. The NRC staff expects that any impacts on groundwater flow and quality caused  
9 by dewatering would be highly localized and short in duration and would cause no effects on  
10 other groundwater users. Discharges resulting from dewatering operations would be released in  
11 accordance with applicable State and local permits.

12 Although foundations, substructures, and backfill may alter onsite groundwater flow patterns,  
13 local and regional trends would remain unaffected. Construction of power generating facilities  
14 may contribute to onsite changes in groundwater infiltration and quality due to the removal of  
15 vegetation and construction of buildings, parking lots, and other impervious surfaces. The  
16 potential impacts of increased runoff and subsurface pollutant infiltration or discharge to nearby  
17 water bodies would be prevented or mitigated through implementation of BMPs and an SWPPP.

18 In addition to construction dewatering, onsite groundwater could be used to support construction  
19 activities (e.g., dust abatement, soil compaction, and water for concrete batch plants).  
20 Groundwater withdrawal during construction could have a temporary impact on local water  
21 tables or groundwater flow, and these withdrawals and resulting discharges would be subject to  
22 applicable permitting requirements.

23 Operation

24 Dewatering for building foundations and substructures may be required during the operational  
25 life of the power facility. Operational dewatering rates, if required, are assumed to be similar to  
26 the current dewatering rate for V.C. Summer of less than 100 gpm and can be managed subject  
27 to applicable permitting requirements. Dewatering discharges and treatment would be properly  
28 managed in accordance with applicable NPDES permitting requirements. The NRC staff  
29 expects that any impacts on groundwater flow and quality affected by dewatering at a rate of  
30 less than 100 gpm would be localized, and that there would be no effects on other groundwater  
31 users due to their distance from the site location.

32 Effluent discharges (e.g., cooling water, sanitary wastewater, and stormwater) from a facility are  
33 subject to applicable Federal, State, and other permits specifying discharge standards and  
34 monitoring requirements. Adherence by power facility operators to proper procedures during all  
35 material, chemical, and waste handling and conveyance activities would reduce the potential for  
36 any releases to the environment, including releases to the subsurface and groundwater.

37 For power alternatives, groundwater use during operation is assumed to be similar to current  
38 nuclear power plant use, where a groundwater dewatering system discharges less than  
39 100 gpm. Onsite groundwater withdrawals would be subject to applicable State water  
40 appropriation, permitting, and registration requirements. Site groundwater use was determined  
41 by the NRC staff to have minimal impact on surrounding groundwater use or quality, as  
42 described in Section 3.5.3.2 of this document.

1 **3.5.6 Natural Gas Alternative**

2 3.5.6.1 *Surface Water Resources*

3 This alternative includes a new, natural gas combustion turbine plant constructed on the  
4 abandoned Units 2 and 3 site to replace the current generating capacity of the current Unit 1  
5 V.C. Summer plant, approximately 966 MWe (net) (Dominion 2023-TN10387). The hydrologic  
6 and water quality assumptions for construction and operation described in Section 3.5.5.1 of this  
7 SEIS as common impacts to all replacement power alternatives also apply to this alternative.  
8 The water demand of the proposed natural gas combustion turbine units along with new MDCTs  
9 would have withdrawal and consumptive water demands that are far less than current demands  
10 for V.C. Summer Unit 1. Using factors of 4 gpm/MWe (withdrawal) and 3.1 gpm/MWe  
11 (consumption) for a 966 MWe NGCC plant (NETL 2022-TN8820: Exhibit 5-94), estimated  
12 withdrawal and consumptive demands are approximately 2,000 MGY and 1,600 MGY,  
13 respectively, compared to recent withdrawals of over 200,000 MGY and consumption of over  
14 5,000 MGY (Dominion 2023-TN10387). NGCC water use would be primarily associated with  
15 cooling water makeup. The use of surface water for cooling tower makeup and blowdown as  
16 well as plant discharge would be required to comply with appropriate NPDES permits.

17 Some water quality impacts could result from erosion and runoff associated with construction  
18 and operations that would be controlled by implementation of BMPs and compliance with  
19 stormwater permits along with applicable regulations. Based on this analysis, the NRC staff  
20 concludes that the overall impacts on surface water resources from construction and operation  
21 under the NGCC alternative would be SMALL.

22 3.5.6.2 *Groundwater Resources*

23 The new NGCC plant required for this alternative would be constructed on the abandoned  
24 Units 2 and 3 site to replace the current generating capacity of the V.C. Summer plant. The  
25 hydrologic and water quality assumptions and implications for construction and operations  
26 described in Section 3.5.5 of this SEIS as being common to all replacement power alternatives  
27 also apply to this alternative. Although water withdrawal and consumptive demands will likely be  
28 less than what is required by the current site, it is unlikely groundwater use would occur due to  
29 the low yields of the onsite aquifer system. Therefore, the NRC staff concludes that the impacts  
30 on groundwater resources from construction and operation under the natural gas alternative  
31 would be SMALL.

32 **3.5.7 New Nuclear (Small Modular Reactor) Alternative**

33 3.5.7.1 *Surface Water Resources*

34 This alternative proposes the installation of two, 12-unit SMRs at the abandoned Units 2 and 3  
35 site. The modular reactors will have a closed-cycle cooling system that uses MDCTs with  
36 makeup water from the Monticello Reservoir. As with the NGCC alternative, the primary  
37 operations-related water use would be for cooling water. Based on water demand factors for  
38 SMR technologies (NRC 2019-TN6136), annual water withdrawals for the 1,768 MWe SMR  
39 alternative would be significantly less (<10 percent) than current amounts, but consumptive use  
40 would be expected to increase by around 180 percent (from 22 cfs to 63 cfs [from 0.6 m<sup>3</sup>/s to  
41 1.8 m<sup>3</sup>/s]).

1 The NRC staff assumes that the SMR plant would operate in compliance with a State issued  
2 NPDES permit, any applicable industrial stormwater permit, State and local surface withdrawal  
3 requirements, and would have spill prevention and response procedures in place to minimize  
4 impacts on surface water quality. Some water quality impacts could result from erosion and  
5 runoff associated with construction and operations that would be controlled by implementation  
6 of BMPs and compliance with stormwater permits along with applicable regulations.

7 Based on the above analysis, because the consumptive water use is noticeably increased but  
8 potential water quality impacts would be controlled and managed, the NRC staff concludes that  
9 the overall impacts on surface water resources from construction and operation under the new  
10 nuclear alternative would likely be SMALL to MODERATE.

### 11 3.5.7.2 *Groundwater Resources*

12 The hydrologic and water quality assumptions as well as implications for construction and  
13 operations described in Section 3.5.5.2 of this SEIS as being common to all replacement power  
14 alternatives would also apply to this alternative. The NRC staff did not identify any impacts on  
15 groundwater resources for this alternative beyond those discussed above as being common to  
16 all replacement power alternatives. Although consumptive water use would increase with the  
17 operation of two, 12-unit SMRs (as described in Section 3.5.7.1 of this SEIS), it is considered  
18 unlikely new groundwater use at the site would be utilized (due to low well yields [Dominion  
19 2023-TN10387]). Therefore, the NRC staff concludes that the impacts on groundwater  
20 resources from installation and operation of two, 12-unit SMRs at the abandoned Units 2 and 3  
21 site would be SMALL.

## 22 3.5.8 **Natural Gas and Solar Combination Alternative**

### 23 3.5.8.1 *Surface Water Resources*

24 This alternative includes a proposed 700 MWe NGCC located at the abandoned Units 2 and 3  
25 site, a 60 MW solar installation with battery storage at the Units 2 and 3 site, and three offsite  
26 100 MW solar installations with battery storage located offsite in South Carolina.

27 The surface water use and quality impacts for the combination NGCC plant would be less than  
28 those described for the NGCC alternative discussed in Section 3.5.6.1 of this SEIS due to its  
29 smaller generating capacity. The construction of the solar installations and new transmission  
30 lines would require water for dust suppression, equipment washing, and sanitary systems.  
31 Operational water requirements for the solar portion are dependent on whether the solar  
32 technology is photovoltaic (PV) or concentrating solar power (CSP). No water is required for  
33 operation of PV solar installations beyond a small amount for periodic washing of the panels.  
34 However, CSP would require water for mirror washing, makeup, and cooling water. A 360 MWe  
35 CSP plant would require between 2,300 MGY and 2,700 MGY (NRC 2024-TN10161); for CSP,  
36 it is assumed that withdrawal and consumption are identical (NRC 2024-TN10161).

37 Water demands during construction of the NGCC plant and the onsite portion of the solar  
38 installations would be sourced from V.C. Summer's water treatment plant and water supply. For  
39 offsite installations, water would either be trucked in or sourced from local surface and  
40 groundwater (Dominion 2023-TN10387). The NGCC plus CSP alternative would require much  
41 lower total withdrawals (around 4,000 MGY) than current withdrawals (over 200,000 MGY), and  
42 total consumption would be slightly lower (3,400 to 3,800 MGY) than current consumptive use  
43 (around 5,000 MGY). The 360 MWe of CSP would be installed at multiple locations, and water

1 use impacts would depend on water availability at those locations. The NGCC plus PV  
2 alternative would have much less withdrawal and consumptive use with approximately  
3 1,400 MGY of withdrawals and 1,140 MGY of consumption. The NRC staff assumes that  
4 appropriate water withdrawal permits and authorizations would be obtained for any offsite CSP  
5 plants and for the proposed NGCC plant at the abandoned Units 2 and 3 site.

6 Based on the above analysis, the NRC staff concludes that the overall impacts on surface water  
7 resources from construction and operations of the NGCC and solar combination alternative  
8 would likely be SMALL.

### 9 3.5.8.2 *Groundwater Resources*

10 The hydrologic and water quality assumptions and implications for construction and operations  
11 described in Section 3.5.5.2 of this SEIS as being common to all replacement power  
12 alternatives also apply to this alternative. The NRC staff did not identify any impacts on  
13 groundwater resources for this alternative beyond those discussed above as being common to  
14 all replacement power alternatives. Therefore, the NRC staff concludes that the impacts on  
15 groundwater resources from construction and operations under the natural gas and solar  
16 combination alternative would be SMALL.

## 17 **3.5.9 New Nuclear and Solar Combination Alternative**

### 18 3.5.9.1 *Surface Water Resources*

19 This alternative proposes the installation and operation of a single 12-unit SMR at the  
20 abandoned Units 2 and 3 site. The modular reactors will have a closed-cycle cooling system that  
21 uses MDCTs with makeup water from the Monticello Reservoir. The SMR capacity for this  
22 combined alternative is estimated at 884 MWe, with 82 MWe of solar making up the remaining  
23 capacity to replace the 966 MWe of Unit 1. Based on water demand factors for SMR  
24 technologies (NRC 2019-TN6136), annual water withdrawals for the 884 MWe SMR alternative  
25 would be significantly less (<5 percent) than current amounts, but consumptive use would be  
26 expected to increase by around 40 percent (from 22 cfs to 31 cfs [from 0.62 m<sup>3</sup>/s to 0.9 m<sup>3</sup>/s]). As  
27 for the NGCC plus solar alternative, the water demand for the solar portion of this alternative  
28 depends on whether the technology is PV or CSP. An 82 MWe CSP plant would require around  
29 2.5 cfs for withdrawal and consumption. However, the additional withdrawal and consumptive  
30 demand of a CSP solar option versus PV is small relative to the demand of the 884 MWe SMR  
31 portion. Overall, the SMR plus solar alternatives, whether solar is PV or CSP, would require  
32 much less annual withdrawals but would increase consumptive use by approximately 50 percent.

33 Surface water use and water quality impacts associated with the installation and operation for  
34 an onsite SMR and solar installation alternatives are discussed in Section 3.5.7.1 and  
35 Section 3.5.8.1 of this SEIS, respectively. Surface water use and water quality impacts  
36 associated with the installation and operation for an onsite SMR and solar installation  
37 alternatives are discussed in Section 3.5.7.1 and Section 3.5.8.1 of this SEIS, respectively.  
38 Based on this analysis, the NRC staff concludes that the overall impacts on surface water  
39 resources from construction and operation for the new nuclear and solar combination alternative  
40 would likely be SMALL.

### 41 3.5.9.2 *Groundwater Resources*

42 The hydrologic and water quality assumptions and implications for construction and operations  
43 described in Section 3.5.5.2 of this SEIS as being common to all replacement power

1 alternatives also apply to this alternative. The NRC staff did not identify any impacts on  
2 groundwater resources for this alternative beyond those discussed above as being common to  
3 all replacement power alternatives. The annual water withdrawal rate for a single 12-unit SMR is  
4 expected to be much less than the current withdrawal rate, and no water is required for  
5 operation of the solar installations beyond a small amount for periodic washing of the panels.  
6 Therefore, utilization of new groundwater use at the site is unlikely (Dominion 2023-TN10387).  
7 The NRC staff concludes that the impacts on groundwater resources from construction and  
8 operation for the new nuclear and solar combination alternative would likely be SMALL.

### 9 **3.6 Terrestrial Resources**

10 This section describes the terrestrial resources of the V.C. Summer site and the surrounding  
11 landscape. Following the description, the NRC staff analyzes the potential impacts on terrestrial  
12 resources from the proposed action of SLR and alternatives to the proposed action. Information  
13 here is based on the NRC's initial V.C. Summer license renewal SEIS (NRC 2004-TN7262), the  
14 applicant's ER (Dominion 2023-TN10387), and other publicly available information.

#### 15 **3.6.1 Ecoregion**

16 The V.C. Summer site lies within the Piedmont Ecoregion (Dominion 2023-TN10387:  
17 Section E3.7.2.1). The EPA (Griffith et al. 2002-TN10428) characterizes this ecoregion (Level III  
18 Ecoregion 45) as a transitional area between the mountainous Appalachians to the northwest  
19 and the relatively flat coastal plains to the southeast. Topography consists of irregular plains  
20 with some hills as the ecoregion covers the non-mountainous portion of the old Appalachian  
21 Highland. Land covers consist of urban and suburban areas with a mosaic of oak-hickory-pine  
22 forest and pastures. Two Level IV ecoregions occur within 6 mi (10 km) of V.C. Summer site:  
23 (1) Southern Outer Piedmont, and (2) Carolina Slate Belt. Primary pre-settlement vegetation of  
24 Southern Outer Piedmont consists of pine (loblolly and shortleaf) within old field sites and pine  
25 plantations, and mixed oak forest. For the Carolina Slate Belt, pre-settlement vegetation was  
26 oak-hickory-pine forest dominated by white oak (*Quercus alba*), southern red oak  
27 (*Quercus falcata*), post oak (*Quercus stellata*), and hickory (*Carya* spp.), with shortleaf pine  
28 (*Pinus echinata*), and loblolly pine (*Pinus taeda*) (Griffith et al. 2002-TN10429).

29 The U.S. Army Corps of Engineers (USACE) defines wetlands as areas either inundated or  
30 saturated by surface or groundwater at a frequency and duration sufficient to support (and that  
31 under normal circumstances do support) a prevalence of vegetation typically adapted for life in  
32 saturated soil conditions. In its ER, Dominion (Dominion 2023-TN10387) characterizes the  
33 National Wetlands Inventory features in the 6 mi (9.65 km) vicinity surrounding the  
34 V.C. Summer site as follows:

- 35 • freshwater emergent wetlands 186 ac (75.27 ha)
- 36 • freshwater forested/shrub wetlands 1,695 ac (685.94 ha)
- 37 • freshwater ponds 183 ac (74.06 ha)
- 38 • lakes 9,513 ac (3,849.78 ha)
- 39 • riverine waters 875 ac (354.1 ha)

#### 40 **3.6.2 V.C. Summer Site**

41 The V.C. Summer site consists of about 2,200 ac (890 ha) of land along the southern shores of  
42 the Monticello Reservoir in Fairfield County, South Carolina (Dominion 2023-TN10387:  
43 Section E3.1). The V.C. Summer site lies within the Southern Outer Piedmont (Level IV  
44 Ecoregion 45b). This ecoregion is dominated by irregular plains and loblolly pine plantations  
45 (Griffith et al. 2002-TN10428).

1 Within the approximately 2,200 ac (890 ha) site, the V.C. Summer plant and supporting facilities  
 2 are located on about a 370 ac (149.7 ha) of industrial area along the southern shores of the  
 3 Monticello Reservoir. Because these facilities are mostly located on previously cultivated areas,  
 4 existing vegetation in the industrial area around the plant is mainly early successional grasses  
 5 and forbs.

6 About 24 percent of the 2,200 ac (890 ha) V.C. Summer site consists of developed land cover  
 7 types, 37.7 percent is open water, and the remaining 38.3 percent of the site is vegetated  
 8 (Dominion 2023-TN10387: Table 3.2-1). Forests and shrub/scrub are the dominant vegetation  
 9 types, covering about 24 percent and 6.9 percent of the site, respectively. Most of the forest is  
 10 evergreen forest (19 percent). Minor forest types are deciduous (2.6 percent) and mixed forests  
 11 (2.4 percent). Other minor vegetation types (less than 5 percent) are grassland/herbaceous  
 12 (3.3 percent), pasture/hay (2.5 percent), barren land (rocks/sand/clay) (1.4 percent), woody  
 13 wetlands (0.1 percent), and emergent herbaceous wetlands (0.1 percent).

14 The descriptions, presented in Dominion’s ER (2023-TN10387: Section E3.7.2.2), characterize  
 15 the terrestrial habitats within the site boundary. Habitat descriptions of the associated tree,  
 16 shrub, and herbaceous strata are incorporated here by reference:

- 17 • upland pine
- 18 • mesic forest
- 19 • rock outcrops
- 20 • river bottoms
- 21 • Piedmont small stream forest
- 22 • cove forest
- 23 • depressions
- 24 • upland mixed forest
- 25 • grassland and early successional habitats

26 V.C. Summer site boundaries contain a total of 837 ac (338.72 ha) of wetlands, lakes, ponds,  
 27 and riverine waters (Table 3-9 below) (Dominion 2023-TN10387: Section E3.7.2.4). Table 3-9  
 28 summarizes the area and percentage of wetlands and surface water features on the  
 29 V.C. Summer site as documented in the National Wetlands Inventory. Figure 3-9 shows the  
 30 location of National Wetlands Inventory wetlands on a map of the V.C. Summer site.

31 **Table 3-9 Wetlands and Surface Water Features on the Virgil C. Summer Nuclear**  
 32 **Station Site as Mapped in the National Wetlands Inventory**

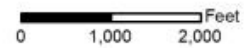
Wetland or Water Feature	Area	Percent of Onsite Wetland Habitat
Freshwater Forested/Shrub Wetlands	4.0 ac	0.48
Riverine Waters	11.4 ac	1.36
Freshwater Ponds	3.35 ac	0.40
Lakes	818.5 ac	97.76
<b>Total</b>	<b>837.25 ac</b>	<b>100.00</b>

Source: Dominion 2023-TN10387.



**Legend**

- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Riverine



1  
2  
3  
4

**Figure 3-9 Wetlands Located Within the Virgil C. Summer Nuclear Station Site as Mapped in National Wetlands Inventory. Source: Dominion 2023-TN10387: Figure 3.7-2.**

1 Wildlife species occurring on the V.C. Summer site consist of those species typically found in  
2 South Carolina forests, croplands, developed areas, and riparian areas. Table E3.7-3 in the  
3 applicant's ER presents a list of the terrestrial wildlife species likely to occur in Fairfield,  
4 Richland, and Newberry counties; this list includes 31 mammals, 277 birds, 64 amphibians, and  
5 67 reptiles. Common mammals include toads (Fowler's toad [*Anaxyrus fowleri*]), lizards  
6 (Carolina anole [*Anolis carolinensis*], fence lizard [*Sceloporus undulatus*], various skinks),  
7 snakes (black racer [*Coluber constrictor*], rat snake, ringneck snake [*Diadophis punctatus*]),  
8 songbirds (cardinal, bluejay, towhee, various warblers), birds of prey (red-tailed hawk [*Buteo*  
9 *jamaicensis*], red-shouldered hawk [*Buteo lineatus*]), and many small mammals (gray squirrel  
10 [*Sciurus carolinensis*], eastern cottontail [*Sylvilagus floridanus*], raccoon, white-tailed deer  
11 [*Odocoileus virginianus*]).

12 Birds on the V.C. Summer site include a mix of resident bird species that may breed or  
13 overwinter, be onsite seasonal residents, or species that stop briefly during migration. The  
14 V.C. Summer site is located within the Atlantic flyway, an important bird migration route which  
15 extends from South America to Canada. Migrant birds often fly at night, landing to rest early in  
16 the morning. Suitable habitats that allow migratory birds to feed, rest, and avoid predators are  
17 called stopovers. Large natural barriers may create crowded stopover locations because flights  
18 over the barriers mean long stretches without opportunities to rest or feed. Along the Atlantic  
19 flyway, mountains, deserts, or large bodies of water are major barriers. Many species of  
20 migratory birds likely use the V.C. Summer site and vicinity during the spring and fall  
21 migrations.

### 22 **3.6.3 Important Species and Habitats**

23 Important terrestrial species and habitats discussed in this section include those protected by  
24 State and Federal laws, invasive species, and those that are culturally important. In particular,  
25 bald eagles (*Haliaeetus leucocephalus*) and osprey (*Pandion haliaetus*) are known to nest on  
26 the V.C. Summer site on the eastern edge of the boundary near the offsite water supply facility  
27 and the meteorological evaluation tower (MET), respectively (Dominion 2023-TN10387,  
28 Dominion 2024-TN10391). Section 3.6.3.3 of this SEIS discusses bald eagles in more detail.

#### 29 **3.6.3.1 Federally Listed Species**

30 For a discussion of terrestrial species and habitats that are federally protected under the  
31 Endangered Species Act of 1973, as amended, see Section 3.8 of this SEIS.

#### 32 **3.6.3.2 State-Listed Species**

33 Dominion (2023-TN10387: Table E3.7-4) provided a list of species that the State of South  
34 Carolina has listed as threatened or endangered and that are known to occur or potentially  
35 occur in Fairfield, Richland, and Newberry counties. Of these State-listed species, three are also  
36 federally listed by the U.S. Fish and Wildlife Service as endangered, threatened, or candidates  
37 for Federal listing, and one is an aquatic species. The NRC staff addresses all federally listed  
38 species in Section 3.8 of this SEIS and State-listed aquatic species in Section 3.7 of this SEIS.  
39 Table 3-10 below summarizes the six terrestrial species that are State-listed as threatened or  
40 endangered (but not also federally listed) and are known to occur in Fairfield, Richland, and  
41 Newberry counties.



1 **Table 3-10 State-Listed Species (That Are Not Also Federally Listed) for Fairfield,**  
 2 **Richland, and Newberry Counties, Potentially Occurring in the Vicinity of**  
 3 **Virgil C. Summer Nuclear Station**

Common Name	Scientific Name	Class	State Legal Status
Bald Eagle <sup>(a,b)</sup>	<i>Haliaeetus leucocephalus</i>	Bird	Threatened
Spotted Turtle <sup>(b)</sup>	<i>Clemmys guttata</i>	Reptile	Threatened
Southern hognosed snake <sup>(b)</sup>	<i>Heterodon simus</i>	Reptile	Threatened
Pine barrens treefrog <sup>(b)</sup>	<i>Dryophytes andersonii</i>	Amphibian	Threatened
Carolina gopher frog <sup>(b)</sup>	<i>Lithobates capito</i>	Amphibian	Endangered
Rafinesque’s big-eared bat <sup>(b)</sup>	<i>Corynorhinus rafinesquii</i>	Mammal	Endangered

(a) Species with potential habitat on the V.C. Summer site.

(b) Species known within 6 mi (9.66 km) of the V.C. Summer site (Dominion 2023-TN10387: Section E3.7.8.2).

4 For all species in Table 3-10, Dominion’s ER contains full species descriptions and occurrence  
 5 information (Dominion 2023-TN10387: Sections E3.7.8.2 and E4.6.23.4.2), which the NRC  
 6 incorporates here by reference. Of the six State-listed terrestrial species that are not also  
 7 federally listed (Table 3-10), one is a bird, one is a mammal, two are reptiles, and two are  
 8 amphibians.

9 Of the six State-listed terrestrial species (Table 3-10), only bald eagles are known to occur on  
 10 the V.C. Summer site. Bald eagles are discussed below in Section 3.6.3.3 of this SEIS.

11 In addition, potential habitat for the spotted turtle occurs on the V.C. Summer site. According to  
 12 Dominion’s ER (Dominion 2023-TN10387), the spotted turtle was recorded within the past  
 13 5 years within 6 mi (9.7 km) of the V.C. Summer site. However, the species is not known to  
 14 occur on the V.C. Summer site. Spotted turtles inhabit a variety of wetland types including  
 15 ponds, small streams, swamps, flooded forests, and other shallow bodies of water. Potential  
 16 habitat occurs within the emergent wetlands onsite; however, these wetlands are separated  
 17 from other areas of potential habitat, i.e., shallow bodies of water and wetlands, offsite.

18 **3.6.3.3 Species Protected under the Bald and Golden Eagle Protection Act**

19 The Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d-TN1447) extends regulatory  
 20 protections to the bald eagle and golden eagle. The Act prohibits anyone without a permit from  
 21 the U.S. Secretary of the Interior from “taking” bald eagles or golden eagles, including their  
 22 parts, nests, or eggs.

23 Dominion summarizes eagle occurrences and nesting on the V.C. Summer site and in the  
 24 vicinity (2023-TN10387: Section E3.7.8.2.2 and Section E3.7.8.3). Bald eagles are known to  
 25 nest on the V.C. Summer site and in the vicinity at the adjoining Parr/Fairfield FERC project  
 26 boundary. In addition, the ER (2023-TN10387) stated that by the 1990s six bald eagle nesting  
 27 sites occurred within a 5 mi (8 km) radius of the station. Although golden eagles are known to  
 28 winter within the coastal plains of South Carolina (Vukovich et al. 2015-TN10430; National  
 29 Audubon Society 2024-TN10431), they are not known to nest within the State. Furthermore, the  
 30 U.S. Fish and Wildlife Service (FWS) did not list golden eagles as a species of concern for the  
 31 site within the Information for Planning and Consultation report (FWS 2024-TN10473).

1 Dominion maintains a corporate avian protection plan and migratory bird special purpose utility  
2 permit (SPUT), which authorizes the collection, transport, and temporary possession of  
3 migratory birds found on the property, structures, and associated transmission lines for avian  
4 morality monitoring. The SPUT permit is currently being renewed, and while the renewal is  
5 being processed, Dominion is adhering to the previous permit conditions (2023-TN10387:  
6 Section E3.7.8.2.2, 2024-TN10391). In addition, Dominion currently has a Migratory Bird Permit  
7 from South Carolina Department of Natural Resources (SCDNR) (#MB-03-24) (2024-TN10391).

8 Dominion's corporate Avian Protection Plan and its Migratory Bird and Eagle Protection  
9 document summarize the requirements, explain how these requirements apply to Dominion's  
10 sites and activities, and detail protocols and reporting procedures that Dominion personnel and  
11 contractors must follow regarding eagles and eagle nests on site. These documents state that  
12 unless there is a site-specific determination that disturbance can be closer due to time of year,  
13 disturbances must not occur within 660 feet of an active bald eagle nest and must ensure that  
14 large nest protocol is followed with any nest equal to or greater than 2 ft (0.61 meters [m]) in  
15 diameter, which is assumed to be a bald eagle nest until a biologist confirms otherwise  
16 (Dominion 2024-TN10391). From 2013–2023, Dominion reported 32 bird incidents (2024-  
17 TN10391). There were no incidents involving the in-scope transmission lines and bald eagles.

18 In addition to the avian protection policies and permits, physical avian safety features are in  
19 place onsite as approximately 10 percent of the in-scope transmission lines have avian safety  
20 features installed which include cones on the poles and triangles on the arms that hold the static  
21 wires. No plastic coils are installed on in-scope lines (Dominion 2024-TN10391).

#### 22 3.6.3.4 *Species Protected under the Migratory Bird Treaty Act*

23 The Migratory Bird Treaty Act (MBTA) makes it illegal for anyone to take, possess, import,  
24 export, transport, sell, purchase, barter, or offer for sale any migratory bird or the parts, nests, or  
25 eggs of such a bird except under the terms of a valid permit issued under Federal regulations.  
26 Dominion has a FWS SPUT permit and a corporate avian protection plan to address migratory  
27 birds that may be present, injured, or killed on Dominion property (Dominion 2023-TN10387:  
28 Section E4.6.23.4.2). This permit can only be issued to utility companies to collect, transport,  
29 and temporarily possess migratory birds found dead on utility properties, structures, and  
30 rights-of-way (FWS Undated-TN9282). In emergency circumstances, permit holders may  
31 relocate or destroy active nests.

32 In its ER, Dominion lists 277 bird species that are likely to be observed in Fairfield, Newberry,  
33 and Richland counties (Dominion 2023-TN10387: Section E3.7.8.4). Of these 277 bird species,  
34 265 species are protected by the MBTA (50 CFR Part 10-TN5490). In addition, 14 of these  
35 migratory birds are Birds of Conservation Concern, a FWS designation for species of highest  
36 conservation priority that are not already federally listed as threatened or endangered (FWS  
37 2021-TN8740): American kestrel (*Falco sparverius paulus*), bald eagle, black-billed cuckoo  
38 (*Coccyzus erythrophthalmus*), Cerulean warbler (*Dendroica cerulea*), eastern whip-poor-will  
39 (*Antrostomus vociferus*), Henslow's sparrow (*Ammodramus henslowii*), Kentucky warbler  
40 (*Oporornis formosus*), lesser yellowlegs (*Tringa flavipes*), Prairie warbler (*Dendroica discolor*),  
41 prothonotary warbler (*Protonotaria citrea*), red-headed woodpecker  
42 (*Melanerpes erythrocephalus*), rusty blackbird (*Euphagus carolinus*), swallow-tailed kite  
43 (*Elanoides forficatus*), and wood thrush (*Hylocichla mustelina*).

1 FWS (2024-TN10473) provided a list of seven migratory birds that could occur within the  
2 V.C. Summer site. These birds are of particular concern for the project because they are an  
3 eagle or are a Bird of Conservation Concern: bald eagle, chimney swift (*Chaetura pelagica*),  
4 eastern whip-poor-will, Kentucky warbler, prothonotary warbler, red-headed woodpecker, and  
5 wood thrush.

6 In 2021, an osprey (*Pandion haliaetus*) nest was observed on the MET (Dominion 2023-  
7 TN10387: Section E3.7.8.4). The osprey nest remains active on the MET and Dominion has  
8 modified the lighting schedule onsite to accommodate the nest until it is unoccupied (2024-  
9 TN10391). Ospreys and other migratory birds are handled according to the avian protection  
10 plan and the requirements listed in the South Carolina Department of Natural Resources and  
11 SPUT permits.

12 In 2015, South Carolina revised their comprehensive State Wildlife Action Plan (SWAP), which  
13 addresses the species with greatest conservation need within the State (SCDNR 2020-  
14 TN10432). The SWAP is required to list distribution and abundance of species, location and  
15 relative condition of key habitats, problems that affect species, conservation actions, plans for  
16 monitoring and adaptive management, and coordination with other entities (i.e., Federal, State,  
17 Tribal, and local agencies). Within the past 20 years, Richland counties had six MBTA species  
18 that were ranked high or highest priority within SWAP. Within the past 5–10 years, records of  
19 the painting bunting (*Passerina ciris*), ranked highest priority, occurred within Richland County  
20 (SC Heritage Trust 2023-TN10435). Records of high ranked species such as the black and  
21 white warbler (*Mniotilta varia*), prairie warbler, and wood thrush occurred within Richland County  
22 in the past 5–10 years (SC Heritage Trust 2023-TN10435). Within 10–20 years, sightings of  
23 high ranked Swainson’s warbler (*Limnothlypis swainsonii*) and Baltimore oriole (*Icterus galbula*)  
24 occurred within Richland County (SC Heritage Trust 2023-TN10435). Newberry and Fairfield  
25 counties did not have any MBTA species ranked high or highest priority within the SWAP.

### 26 3.6.3.5 *Invasive Species*

27 Invasive species are identified as nonnative organisms whose introduction causes or is likely to  
28 cause economic or environmental harm or to cause harm to human, animal, or plant health  
29 (EO 13751, 81 FR 88609-TN8375). Executive Order (EO) 13112 (64 FR 6183-TN4477) directs  
30 Federal agencies to not authorize, fund, or carry out actions likely to cause or promote the  
31 introduction or spread of invasive species unless they determine that the benefits of the action  
32 clearly outweigh the harm from invasive species and that all feasible and prudent measures to  
33 minimize risk of harm are taken (EO 13112: Section 2).

34 Dominion noted important invasive species in the vicinity of the V.C. Summer site (Dominion  
35 2023-TN10387: Section E3.7.5). Of these, three are terrestrial animals that have potential  
36 habitat onsite: Asian rock pool mosquito (*Aedes japonicus*), Japanese beetle (*Popillia japonica*),  
37 and imported red fire ant (*Solenopsis invicta*). Newberry and Richland counties are considered  
38 to be infested with Japanese beetles. The aquatic plants, alligatorweed, Brazilian waterweed,  
39 brittleleaf naiad, Eurasian watermilfoil, European water chestnut, hydrilla, and water primrose,  
40 are addressed in Section 3.7.1 of this SEIS. The remaining invasive plant species (Dominion  
41 2023-TN10387: Section E3.7.5.3) have the potential to occur within the site and are addressed  
42 here as terrestrial species, with full species biology and occurrence information incorporated by  
43 reference from Dominion’s ER. The following invasive terrestrial species are reported to occur  
44 within 6 mi (9.65 km) of the site, as documented in records from iNaturalist and EDD Maps  
45 (iNaturalist 2024-TN10433 and University of Georgia 2024-TN10434).

1 Within the cleared transmission corridor, on the edges of the forest, and roadsides, autumn olive  
2 (*Elaeagnus umbellata*), Chinese bushclover (*Lespedeza cuneata*), Japanese wisteria  
3 (*Wisteria floribunda*), and Japanese honeysuckle (*Lonicera japonica*) have the potential to occur  
4 onsite (Smith 2008-TN10436; Gucker 2010-TN10437; NC Cooperative Extension Undated-  
5 TN10438; and Swearingen et al. 2010-TN10439). Records of these species occur  
6 approximately 2–3 mi (3.22 km–4.83 km) from the V.C. Summer site and the seeds of these  
7 species can be distributed widely by wildlife and human disturbances. In addition, water can  
8 spread the Japanese wisteria seed, and occurrences have been noted on the shores of Lake  
9 Monticello (Swearingen et al. 2010-TN10439).

10 Within the shady forested areas onsite, great periwinkle (*Vinca major*) may occur. Records of  
11 the invasive plant occur approximately 3 mi (4.83 km) from the V.C. Summer site by the Broad  
12 River, and can spread by nodes and through water pathways (NC Cooperative Extension  
13 Undated-TN10440).

14 From the floodplains of Lake Monticello and streams onsite to the buildings and forests, Asian  
15 rock pool mosquito and red imported fire ant have potential to occur. Asian rock pool mosquitos  
16 are known within South Carolina. Larvae tend to be found more frequently in wooded and rural  
17 areas within rock pools or artificial containers like tires or containers made of concrete (Kaufman  
18 and Fonseca 2014-TN10441). Occurrence of red imported fire ants were noted approximately  
19 1.5 mi (2.41 km) north of the V.C. Summer site, within islands in Lake Monticello, as well as  
20 3 mi (4.83 km) from a transmission corridor. Fire ants can form rafts to survive flooding  
21 conditions and could potentially migrate to the site by raft or through infected soil or equipment  
22 associated with soil movement (Clemson 2024-TN10442 and iNaturalist 2024-TN10443).

23 Within the wetlands onsite, the pond slider (*Trachemys scripta*) may occur. The slider is a  
24 ubiquitous invasive turtle that prefers freshwater wetland systems within low elevations  
25 (SCPARC 2020-TN10444). This turtle outcompetes, hybridizes with, and potentially transmits  
26 diseases to native turtle species. Several records occur within 2 to 6 mi (3.22 km to 9.65 km) of  
27 the V.C. Summer site, the closest of which occurs within Parr Reservoir.

#### 28 3.6.3.6 *Important Habitats*

29 Important habitats include any wildlife sanctuaries, refuges, preserves, or habitats identified by  
30 State or Federal agencies as unique, rare, prioritized for protection, wetlands and floodplains,  
31 and land areas identified as critical habitat for species listed by the FWS as threatened or  
32 endangered. Important habitats on and around the V.C. Summer site include the wetlands  
33 discussed above in Sections 3.6.1 and 3.6.2 of this SEIS. No critical habitat for federally  
34 protected species occurs within the V.C. Summer site (Section 3.8).

35 In addition, nearby Federal lands provide important terrestrial habitats (Dominion 2023-  
36 TN10387: Sections E3.7.4). Sumter National Forest-Enoree Ranger District provides special  
37 areas managed for waterfowl and other areas are maintained in an open state for habitat  
38 diversity. State lands such as Parr Reservoir Waterfowl Management Area and leased land  
39 such as the Monticello Reservoir Waterfowl Management Area also provide important habitats.  
40 The Parr Reservoir Waterfowl Management Area and the Monticello Reservoir Waterfowl  
41 Management Area are designated as a Category II Waterfowl Areas, which means they consist  
42 of generally lower quality habitat, and are less intensively managed.

1 3.6.3.7 *Culturally Important Species*

2 No culturally important species were identified onsite or within 6 mi (9.65 km) of the  
3 V.C. Summer site during the NRC staff's cultural consultations discussed in Section 3.9 of this  
4 SEIS.

5 **3.6.4 Proposed Action**

6 As described in the LR GEIS (NRC 2024-TN10161) and cited in Table 3-1 of this SEIS, the  
7 impacts of all Category 1 (generic) terrestrial resources would be SMALL. The NRC staff's  
8 review did not identify any new and significant information that would change the conclusions in  
9 the LR GEIS. Thus, consistent with the conclusions in the LR GEIS for these Category 1  
10 (generic) issues, the impacts of continued operation of V.C. Summer on terrestrial resources  
11 would be SMALL. Table 3-2 identifies two Category 2 issues that require site-specific analysis  
12 for V.C. Summer SLR to determine whether impacts would be SMALL, MODERATE, or LARGE.  
13 These issues are (1) non-cooling impacts, and (2) water use conflicts with terrestrial resources  
14 (plants with once-through cooling systems or cooling ponds using makeup water from a river).  
15 The sections below analyze these issues in detail.

16 The following sections address the plant-specific environmental impacts of the V.C. Summer  
17 SLR on the environmental issues related to terrestrial resources.

18 3.6.4.1 *Non-cooling system Impacts on Terrestrial Resources*

19 According to the 2024 LR GEIS (NRC 2024-TN10161), non-cooling system impacts on  
20 terrestrial resources can include impacts that result from site and landscape maintenance  
21 activities, stormwater management, elevated noise levels, and other ongoing operations and  
22 maintenance activities that would occur during the SLR period on and near a plant site. The  
23 NRC staff based its analysis in this section on information derived from Dominion's ER (2023-  
24 TN10387), unless otherwise cited. Dominion has not identified any refurbishment activities  
25 during the proposed relicensing term (Dominion 2023-TN10387: Section E2.3). Therefore, no  
26 further analysis of potential impacts from refurbishment activities is necessary.

27 In its ER (2023-TN10387: Sections E2.2.2 and E4.6.1.3), Dominion states that it will conduct  
28 ongoing operational and maintenance activities at V.C. Summer throughout the SLR term,  
29 including landscape maintenance activities, stormwater management, and building expansion  
30 and removal. Based on the description of these activities outlined in Dominion's ER (2023-  
31 TN10387), the NRC staff expects that physical disturbances would be limited to paved or  
32 disturbed areas or to areas of mowed grass or early successional vegetation and should not  
33 encroach into wetlands or into the remaining areas of forest and scrub/shrub habitat. Dominion  
34 maintains a special use permit from FWS and has procedures to protect nests and nesting birds  
35 on the V.C. Summer site. As such, the NRC staff concludes that the anticipated activities would  
36 have only minimal effects on terrestrial resources, based on information presented in the ER  
37 and the staff's independent analysis.

38 Dominion (2023-TN10387: Section E4.12.4.5.1) states that it has administrative controls in  
39 place at V.C. Summer to ensure that it reviews operational changes or construction activities  
40 and minimizes environmental impacts through BMPs, permit modifications, or new permits, as  
41 needed. Dominion (2023-TN10387: Section E4.12.4.5.1) further states that regulatory programs  
42 for issues like stormwater management, spill prevention, dredging, and herbicides further  
43 minimize impacts on terrestrial resources. In addition, adherence to regulatory and permit

1 requirements and administrative controls regarding responses to avian collisions with  
2 transmission lines minimizes and avoids impacts to Federal and State-listed species (2023-  
3 TN10387: Section E4.12.4.5.1). Based on this information, the NRC staff concludes that  
4 continued adherence to environmental management practices and BMPs already established  
5 for V.C. Summer would continue to protect terrestrial resources during the SLR operational  
6 period.

7 Operational noise from the V.C. Summer site facilities extends into the remaining natural areas  
8 on the site. However, V.C. Summer has exposed these habitats to similar operational noise  
9 levels since it began operation in 1982. The NRC staff therefore expects that extending the  
10 same level of operational noise levels during the 20-year SLR period is therefore unlikely to  
11 noticeably change the patterns of wildlife movement and habitat use.

12 Based on its independent review of the information provided by Dominion in its ER, the NRC  
13 staff concludes that the landscape maintenance activities, stormwater management, elevated  
14 noise levels, and other ongoing operations and maintenance activities that Dominion might  
15 undertake during the SLR term would primarily be confined to already disturbed areas of the  
16 V.C. Summer site. These activities would neither have noticeable effects on terrestrial  
17 resources, nor would they destabilize any important attribute of the terrestrial resources on or in  
18 the vicinity of the site. The NRC staff expects that Dominion would continue to comply with the  
19 applicable requirements of Federal and State regulatory programs and obtain any required  
20 permits. Accordingly, the NRC staff concludes that non-cooling system impacts on terrestrial  
21 resources during the SLR term would be SMALL.

22 *3.6.4.2 Water Use Conflicts with Terrestrial Resources (Plants with Cooling Ponds or*  
23 *Cooling Towers using Makeup Water from a River)*

24 Water use conflicts occur when the amount of water needed to support riparian communities is  
25 diminished as a result of demand for agricultural, municipal, or industrial use or decreased water  
26 availability due to droughts, or a combination of these factors. The NRC staff describes how this  
27 issue has been addressed historically, and then provides a plant-specific evaluation for the  
28 V.C. Summer SLR term.

29 In the 1996 LR GEIS (NRC 1996-TN288), the NRC evaluated water use conflicts as a surface  
30 water quality issue and included all ecological impacts within this surface water quality issue.  
31 The NRC rated water use conflicts as SMALL. The 2013 LR GEIS (NRC 2013-TN2654)  
32 separated surface water quality issues from ecological water use conflicts. For terrestrial  
33 resources, the NRC created a new issue of water use conflicts for nuclear power plants with  
34 cooling ponds or cooling towers using makeup water from a river, reasoning that riparian  
35 communities could be impacted by reduced flows if the makeup water is from a river. For the  
36 Wolf Creek Generating Station in Coffey County, Kansas, which withdraws makeup water from  
37 a small river with especially low flow during drought conditions, the NRC staff concluded that the  
38 water use conflict impacts on terrestrial resources were SMALL to MODERATE. For other  
39 nuclear power plants, the NRC staff concluded that the impact of water use conflicts with  
40 riparian communities is a plant-specific issue and that the range of impacts at plants with  
41 cooling ponds or cooling towers using make up water from a river could not be determined  
42 generically. The 2024 LR GEIS (NRC 2024-TN10161) determined that water use conflicts with  
43 terrestrial resources would be SMALL at most nuclear power plants with cooling ponds or  
44 cooling towers that withdraw makeup from a river, but may be MODERATE at some plants,  
45 therefore requiring a site-specific review.

1 In the 2004 V.C. Summer LR SEIS (NRC 2004-TN7262), the NRC staff reviewed the available  
2 information, including the rate of evaporative water loss associated with the plant's operations,  
3 maintenance of minimum flow conditions of the Broad River, and past operation information,  
4 and concluded that the impacts were SMALL for V.C. Summer initial LR. In this SEIS, the NRC  
5 staff analyzes surface water resource use conflicts in Section 3.5.3 and water use conflicts  
6 regarding aquatic resources in Section 3.7.3.3. Below, the NRC staff analyzes this plant-specific  
7 issue for the SLR term.

8 V.C. Summer's cooling water intake system operates as an open-cycle (i.e., once-through  
9 cooling plant) that withdraws from and discharges to a cooling pond, Monticello Reservoir  
10 (Dominion 2023-TN10387: Section E2.2.3). Terrestrial riparian communities that could be  
11 impacted by diminished water availability are the terrestrial resources associated with the  
12 wetlands and surface water habitats on the V.C. Summer site (Table 3-10, Figure 3-9). These  
13 riparian habitats total about 837.25 ac (338.8 ha) and consist mostly of lake (97.75 percent of  
14 onsite wetland habitats) and riverine waters (1.36 percent of onsite wetland habitats).

15 In Section 3.5.3.1 of this SEIS, the NRC staff concluded that surface water use conflicts would  
16 be SMALL because the Broad River quickly recovers to exceed the FERC-mandated minimum  
17 releases below the Parr Dam. Accounting for the FERC-mandated minimum release from the  
18 Parr Dam, the estimated total evaporation of 55 cfs (1.6 m<sup>3</sup>/s) from the Monticello Reservoir is  
19 approximately 1.4 percent of mean monthly flow during March, April, and May, and 1.7 percent  
20 of mean monthly flow during the rest of the year. As part of relicensing of the Parr Hydroelectric  
21 Project, FERC mandated minimum instream flows of 150 cfs (4.2 m<sup>3</sup>/s) during most of the year  
22 and 1,000 cfs (28.3 m<sup>3</sup>/s) during the March, April, and May striped bass spawning period  
23 (Dominion 2023-TN10387; NRC 2004-TN7262). FERC did not express any concerns with the  
24 operations of V.C. Summer and its impacts on minimum flow in the Broad River (NRC 2004-  
25 TN7262).

26 The proposed SLR for V.C. Summer would continue current operating conditions and  
27 environmental stressors rather than introduce wholly new impacts. Therefore, the impacts of  
28 current operations and SLR on terrestrial resources would be similar. For the reasons explained  
29 above, water use conflicts with terrestrial resources from SLR either would not occur or would  
30 be so minor that the effects on terrestrial resources would be undetectable. The NRC staff  
31 concludes that water use conflicts with terrestrial resources during the V.C. Summer SLR term  
32 would be SMALL.

### 33 **3.6.5 No-Action Alternative**

34 Under the no-action alternative, the NRC would not issue a renewed license, and V.C. Summer  
35 would shut down on or before the expiration of the current operating license. Much of the  
36 operational noise and human activity at V.C. Summer would cease, thereby reducing  
37 disturbances to wildlife in forest cover and other natural vegetation on and near the site.  
38 However, some continued maintenance of V.C. Summer would still be necessary. Human  
39 activity, noise, and herbicide application would continue at the site with possible impacts  
40 resembling, but perhaps of a lower magnitude than, those described for the proposed action of  
41 SLR. Shutdown itself is unlikely to noticeably alter terrestrial resources. Reducing human  
42 activity and frequency of operational noise may constitute minor beneficial effects on wildlife  
43 inhabiting nearby natural habitats. The NRC staff therefore concludes that the impacts of the no-  
44 action alternative on terrestrial resources during the proposed SLR term would be SMALL.

1 **3.6.6 Replacement Power Alternatives: Common Impacts**

2 Under all the replacement power alternatives that the NRC staff considered, additional land  
3 would likely be temporarily disturbed for construction and laydown areas. If not already  
4 previously disturbed, the licensee could mitigate the impact by later revegetating temporarily  
5 disturbed land. All replacement power alternatives would also involve construction on developed  
6 or undeveloped lands outside the vicinity of the V.C. Summer site with indeterminate loss of  
7 offsite forest, grasslands, desert, or wetlands.

8 Loss of habitat and increased noise generation during construction and operation of the new  
9 facilities could cause terrestrial wildlife to move into other habitats in the surrounding landscape,  
10 increasing demands on those habitats and competing with other wildlife. Erosion and  
11 sedimentation from clearing, leveling, and excavating land could affect adjacent riparian and  
12 wetland habitats. However, implementation of appropriate BMPs and the revegetation of  
13 temporarily disturbed lands would minimize impacts. Natural gas and nuclear facilities would  
14 require cooling towers, which may impact surrounding vegetation via drift or could impact  
15 riparian resources through water withdrawals. The operator of the new facilities would develop  
16 and adhere to environmental management practices and BMPs protect terrestrial resources for  
17 the generation facilities, cooling towers, other plant infrastructure or equipment, and associated  
18 transmission corridors.

19 All the power replacement alternatives assume the construction and maintenance of new  
20 transmission line corridors. Loss of habitat, habitat fragmentation, and increased noise  
21 generation during construction and operation of the new transmission line corridor could cause  
22 terrestrial wildlife to move into other habitats in the surrounding landscape, increasing demands  
23 on those habitats and competing with other wildlife. As the corridor revegetates and routine  
24 maintenance occurs, species favoring differing habitats could avoid or prefer the open habitat of  
25 the corridor. Invasive plants may also colonize the newly created corridors. In a review of bird  
26 mortality literature, Loss et al. (2014-TN9396) estimated that the median annual collision  
27 mortality for birds is 23.2–29.6 birds/km of powerline. Biological, environmental, location, and  
28 design factors influence the likelihood of collisions (APLIC 2012-TN6779; Bevanger 1994-  
29 TN9619).

30 The MBTA makes it illegal to take any migratory bird (or parts, nests, or eggs), except under a  
31 valid permit issued under Federal regulations. The utility may need to commission avian impact  
32 studies and obtain a Federal migratory bird special purpose utility permit for take of MBTA  
33 protected bird species, in order to collect, transport, and temporarily possess migratory birds  
34 found on utility property or to handle active nest (FWS Undated-TN9282).

35 **3.6.7 Natural Gas Alternative**

36 This alternative would involve construction of a 1,110 MWe natural gas plant facility on  
37 approximately 48 ac (19.4 ha) within the existing footprint of the V.C. Summer Units 2 and 3  
38 site. A short extension of the existing natural gas pipeline on the V.C. Summer site would be  
39 required to connect the new gas natural facility. Although some infrastructure upgrades like new  
40 MDCTs may be required, the existing transmission line and transportation infrastructure at the  
41 V.C. Summer would be adequate to support the alternative (Dominion 2023-TN10387).

42 The 2024 LR GEIS (NRC 2024-TN10161: p. 2-35) concludes that many of the impacts on  
43 terrestrial resources from the operation of fossil-fuel energy alternatives would be essentially  
44 similar to those from the continued operation of a nuclear power plant. These similar impacts



1 include cooling tower drift, noise, bird collisions with plant structures and transmission lines, the  
2 impacts connected with herbicide application and landscape management, and the potential  
3 water use conflicts connected with cooling water withdrawals. However, some impacts particular  
4 to a natural gas plant would be from air emissions of GHGs such as nitrogen oxide, CO<sub>2</sub>, and  
5 methane. Such GHGs can lead to consequences like climate change.

6 Because the natural gas facility would use existing V.C. Summer transmission lines, the NRC  
7 staff expects no increased potential in wildlife injury from transmission lines. However, this  
8 alternative will require adding new, tall structures to the landscape. The addition of these tall  
9 structures might result in increased bird or bat mortality or injury from collisions.

10 Based on the above, the NRC staff concludes that the impacts on terrestrial resources from  
11 construction and operation of a natural gas alternative would be SMALL.

### 12 **3.6.8 New Nuclear (Small Modular Reactor) Alternative**

13 This alternative would involve the installation and operation of two, 12-unit SMRs on  
14 approximately 130 ac (53 ha) of V.C. Summer Units 2 and 3 site. Although some infrastructure  
15 upgrades like new MDCTs may be required, the existing transmission line and transportation  
16 infrastructure at the V.C. Summer site would be adequate to support the alternative (Dominion  
17 2023-TN10387).

18 Because the SMR facility would use existing V.C. Summer transmission lines and  
19 transportation, the NRC staff expects no increased potential in wildlife injury. However, the  
20 alternative will require adding new, tall structures to the landscape. The addition of these tall  
21 structures might result in increased bird or bat mortality or injury from collisions.

22 Based on the above, the NRC staff concludes that the impacts on terrestrial resources from  
23 construction and operation of a new nuclear alternative would be SMALL.

### 24 **3.6.9 Natural Gas and Solar Combination Alternative**

25 This alternative would involve the construction of a 700 MWe natural gas facility, a 60 MW solar  
26 PV installation with battery storage, and three 100 MW solar PV installations with battery  
27 storage.

#### 28 Natural Gas Facility

29 Effects of the natural gas portion of this alternative would be similar to the natural gas only  
30 alternative, because the natural gas facility would be sited at the same location (V.C. Summer  
31 Units 2 and 3 site) and would use the same infrastructure. However, because the new natural  
32 gas facility in this alternative would have less generation capacity (700 MWe vs. 1,110 MWe)  
33 and require less land (<19.4 ac [7.85 ha] vs. <48 ac [19.42 ha]) than the natural gas only  
34 alternative, the NRC assumes that the impacts of this portion of the alternative would be less  
35 than that of the natural gas only alternative. Therefore, the NRC staff concludes that the impacts  
36 on terrestrial resources from construction and operation of a natural gas facility would be  
37 SMALL.

#### 38 Solar Facilities

39 Impacts on terrestrial habitats and biota from the construction and operation of solar PV plants  
40 depend largely on the amount of land required and the location of the land. If the land chosen

1 for the solar plants were previously cleared and used for industrial activity, the impacts on  
2 terrestrial resources would be less significant than if the lands were forest, grasslands,  
3 wetlands, or desert containing important species and habitats. Vegetation clearing and tree  
4 removal would displace wildlife to nearby habitats, but some species would return at the end of  
5 construction when temporarily disturbed land is restored. This portion of the alternative requires  
6 approximately 5,100 ac (2,064 ha).

7 Four solar PV facilities with a total generation capacity of 360 MW would be constructed. A  
8 60 MW facility with battery storage would be co-located on the V.C. Summer Units 2 and 3 with  
9 the natural gas facility. In addition, three 100 MW solar PV facilities with battery storage would  
10 be constructed offsite in South Carolina. Total land requirement for the solar facility portion of  
11 this alternative is approximately 3,700 ac (1,497 ha). Although the 60 MW solar facility on the  
12 V.C. Summer Units 2 and 3 site would require no additional transmission corridors, the NRC  
13 estimates that the three offsite solar PV facilities would require new transmission corridors  
14 totaling approximately 1,400 ac (567 ha).

15 Once in operation, solar plants pose special hazards to birds through collisions with PV  
16 equipment and transmission lines, electrocution by substation and distribution lines, and  
17 predation when injured and stunned on the ground after collision (Hathcock 2019-TN8470).  
18 Another less understood cause of bird collisions is known as the lake effect theory. Birds,  
19 especially migrating waterfowl and shorebirds, perceive the horizontally polarized light of PV  
20 solar panels as bodies of water and are injured or killed when they attempt to land on the panels  
21 as if they were water (Horvath et al. 2009-TN897). Water-seeking insects can also collide with  
22 the panels for the same reasons. In large enough numbers, such insect deaths may affect food  
23 webs. The Multiagency Avian-Solar Collaborative Working Group is a collection of Federal and  
24 State agencies identifying information needs and best practices for reducing the impacts of solar  
25 energy on avian populations. Collaboration with government agencies on best practices in the  
26 construction and siting of the solar installations can mitigate their impacts on birds.

27 The NRC staff concludes that the construction and operational impacts on terrestrial resources  
28 from the solar portion of this alternative would be MODERATE to LARGE based on the  
29 significant loss of wildlife habitats and vegetation from the large amount of land required for  
30 facilities and transmission corridors, as well as from the increased mortality risk to birds from  
31 collisions with solar PVs and new transmission lines.

### 32 Alternative Conclusion

33 Based on the above discussion of natural gas and solar facilities, the NRC staff concludes that  
34 the overall impacts on terrestrial resources from this alternative range from MODERATE to  
35 LARGE, mainly because of the large area of land, types of land that could be used for the solar  
36 portion of the alternative, as well as the operational impacts of solar PV on birds and bats.

### 37 **3.6.10 New Nuclear and Solar Combination Alternative**

38 Under this alternative, one 12-unit SMR (884 MWe) would be installed and operated on the  
39 V.C. Summer Units 2 and 3 site, as would one 82 MW solar PV installation with battery storage.  
40 Existing transmission and transportation infrastructure would be used. Total land area required  
41 is less than 830 ac (336 ha).

1 Small Modular Reactor

2 Because the proposed location and design of the SMR are the same as the two-unit SMR  
3 alternative, the NRC staff concludes that the impacts of this portion are similar. Because only  
4 one SMR facility would be constructed instead of two, less land would be required. In addition,  
5 less cooling water would be required, resulting in fewer impacts on the riparian environment and  
6 fewer potential drift impacts to surrounding vegetation. Therefore, the NRC staff finds that the  
7 impacts of construction and operation of the SMR portion of this alternative on terrestrial  
8 resources would be SMALL.

9 Solar Facilities

10 Solar construction impacts for this alternative are less than the natural gas and solar  
11 combination alternative. Although more of the V.C. Summer Units 2 and 3 site would be  
12 developed under this alternative, no offsite lands would be developed for solar installations, nor  
13 would any new transmission corridors be required. Solar panels would still remain a collision  
14 risk for birds, but the reduced generation capacity reduces the probability of collisions.  
15 Therefore, the NRC staff concludes that the construction and operational impacts of the solar  
16 portion of this alternative are SMALL to MODERATE.

17 Alternative Conclusion

18 The NRC staff concludes that the overall impacts on terrestrial resources for the New Nuclear  
19 and Renewables (solar) combination alternative would range from SMALL to MODERATE. The  
20 NRC staff's conclusion is based primarily on the area of land required for the facilities, the fact  
21 that the proposed site was already developed, and the increased likelihood of bird mortality from  
22 collisions with the new solar PV.

23 **3.7 Aquatic Resources**

24 This section describes the aquatic resources of the affected environment, which are associated  
25 with the Monticello Reservoir on Frees Creek and with the Parr Reservoir on the Broad River.  
26 Both are within the Broad River Basin. The NRC staff previously characterized these resources  
27 in Section 2.2.5 of the 2004 V.C. Summer LR SEIS, which analyzed the environmental impacts  
28 of initial license renewal (NRC 2004-TN7262). Section E3.7.1 of Dominion's 2023 ER also  
29 contains a description of the aquatic environment (Dominion 2023-TN10387). Key, new, and  
30 updated information are summarized in the sections below. Following the description of the  
31 aquatic environment, the NRC staff analyzes the potential impacts on these resources that  
32 would occur from the proposed action (SLR) and alternatives.

33 **3.7.1 Monticello Reservoir on Frees Creek**

34 SCE&G constructed the Monticello Reservoir, also called Lake Monticello, in 1977 to supply  
35 cooling water to V.C. Summer and to serve as the upper storage reservoir for the Fairfield  
36 Pumped Storage hydroelectric facility. The reservoir is approximately 6 mi (10 km) in length with  
37 a surface area covering 6,800 ac (2752 ha), which holds a volume of 431,000 ac-ft, and has a  
38 watershed area of 17.4 mi<sup>2</sup> (45 km<sup>2</sup>) in the Frees Creek Valley, a tributary of the Broad River  
39 (Dominion 2023-TN10387 and SCE&G 2019-TN10445: Figure 1). The average reservoir depth  
40 is 59 ft (18 m) with a maximum depth of around 126 ft (38.5 m). During periods of high electrical  
41 demand, generating turbines direct water from the Monticello Reservoir to the Parr Reservoir,  
42 generating power as it flows. In contrast, when electricity needs are low, a portion of the power  
43 generated at V.C. Summer is used to pump water back into the Monticello Reservoir (SCDNR

1 2013-TN10446). Pumped storage activities cause daily fluctuations in water levels, with surface  
2 elevation in the Monticello Reservoir varying by up to 5 ft (1.5 m). There is little natural surface  
3 water flow, and water movement is largely controlled by the V.C. Summer intake and the  
4 hydroelectric turbines.

5 The SCDHEC monitors water quality at two permanent monitoring stations (B-327 and B-328),  
6 and monitors fish tissue at two stations within the publicly accessible portions of the Monticello  
7 Reservoir. SCDHEC checks fish tissue for mercury and PCBs. Currently, there are no fish  
8 consumption advisories within the reservoir (SCDHEC Undated-TN10447). Surface water  
9 temperatures range from approximately 48°F (9°C) during the winter to 86°F (30°C) during the  
10 summer, with spring and summer temperatures at depth up to 12°F (6.7°C) cooler than the  
11 surface (SCDHEC 2020-TN10521). Maximum observed temperatures have not exceeded the  
12 South Carolina’s water classifications and standards at R.61-68 criteria of 90°F (32.2°C) for  
13 freshwaters (Dominion 2023-TN10387). The reservoir is listed on SCDHEC’s 303(d) list of  
14 impaired waterbodies for aquatic life use because of pH (EPA 2022-TN10448; SCDHEC  
15 Undated-TN10450). In the 2007 Broad River Basin Watershed Water Quality Assessment,  
16 samples taken from four stations in the Monticello Reservoir, with 12 to 58 samples at each  
17 station, ranged from 8.56 to 9.03 in pH (SCDHEC 2007-TN10449). That report also described  
18 levels of dissolved oxygen, turbidity, total phosphorus, total nitrogen, fecal coliform bacteria,  
19 cadmium, chromium, copper, lead, mercury, nickel, and zinc; none of which violated the  
20 appropriate State standards. More recent water quality assessment data, which can be  
21 accessed in the South Carolina’s Watershed Atlas, show the same compliance with State  
22 standards as the 2007 published report (SCDHEC Undated-TN10450).

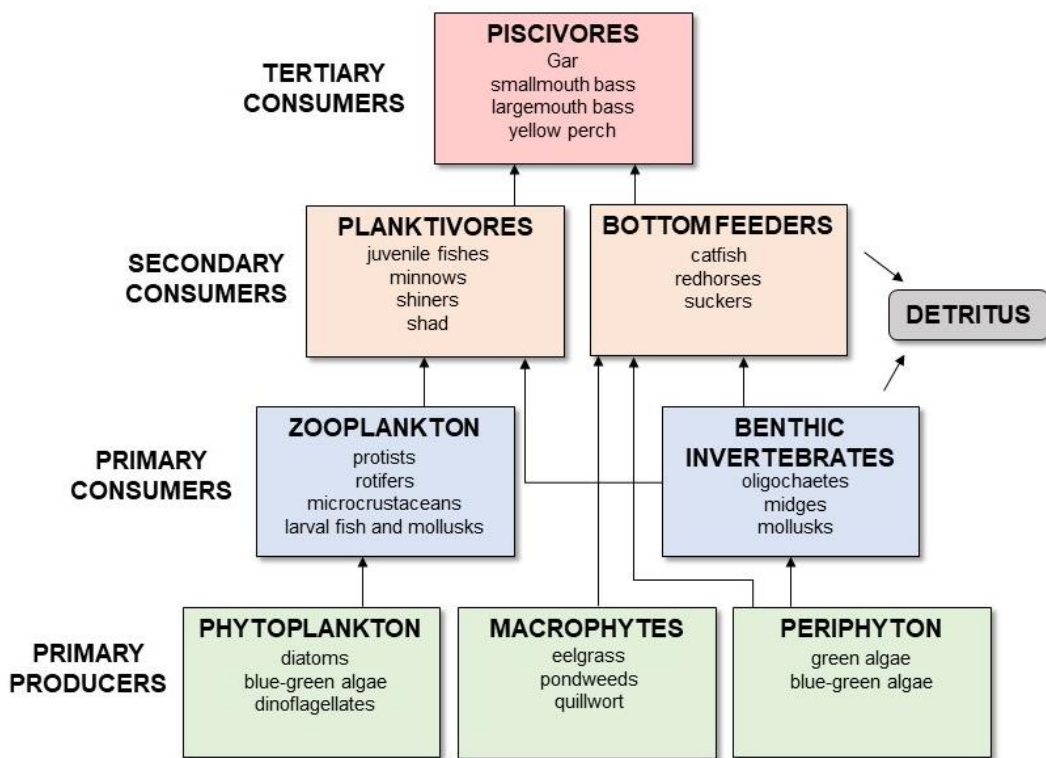
### 23 **3.7.2 Parr Reservoir on the Broad River**

24 The Broad River originates in the Blue Ridge Mountains in North Carolina and flows southeast  
25 into South Carolina. In 1914, a dam was built just west of Jenkinsville, South Carolina to create  
26 the Parr Reservoir for hydroelectric power. In 1976, the dam was raised 9 ft (2.7 m) higher to  
27 37 ft (11 m), in conjunction with the creation of the Monticello Reservoir. Today the Parr  
28 Reservoir, also called Parr Shoals, provides makeup water from evaporative loss to the  
29 Monticello Reservoir. When full, the Parr Reservoir is 13 mi (21 km) long, covering 4,400 ac  
30 (1,780 ha) and has a storage capacity of 32,000 ac-ft (8,960 million gallons [Mgal]) (Dominion  
31 2023-TN10387: Figure E2-1). Pumped storage activities cause daily fluctuations in water levels,  
32 with surface elevation in the Parr Reservoir varying by up to 10 ft (3 m). The Broad River  
33 continues southeast for 26 mi (42 km) where it combines with the Saluda River to form the  
34 Congaree River in Columbia, South Carolina. Average annual flow of the Broad River ranges  
35 from about 1,500 cfs (42.5 m/s<sup>3</sup>) near the North Carolina border to more than 6,000 cfs  
36 (170 m/s<sup>3</sup>) at the confluence with the Saluda River at Columbia (SCDNR 2013-TN10446).

37 The SCDHEC monitors water quality at two stations within the Parr Reservoir (B-345 and  
38 B-346). At these stations, water temperatures are as low as 51°F (10.5°C) at the water’s surface  
39 in January to a peak of 86°F (30°C) in the summer (SCDHEC 2020-TN10521). Until 2019,  
40 USGS also maintained monitoring stations. The recorded temperatures in 2019 at these  
41 stations ranged from 49°F (9.5°C) in January to 84.6°F (29.2°C) in July, with corresponding  
42 dissolved oxygen concentrations of 10.87 mg/L and 5.96 mg/L (USGS 2024-TN10522),  
43 respectively. From 1999 through 2013, SCDHEC’s water quality data showed that dissolved  
44 oxygen concentrations in the Parr Reservoir varied from a low of approximately 4.5 mg/L to a  
45 high of about 13.0 mg/L (Kleinschmidt 2014-TN10523).

1 3.7.2.1 Biological Communities

2 The trophic structure of the Monticello and Parr Reservoirs, which are connected by the  
 3 generating intake and pump-back intakes at the Fairfield Pumped Storage hydroelectric facility,  
 4 includes primary producers (plankton, macrophytes, and periphyton), primary consumers  
 5 (zooplankton and benthic macroinvertebrates), and bottom feeding, planktivorous, and  
 6 piscivorous fish that serve as secondary and tertiary consumers. Primary producers are  
 7 organisms that capture solar energy and synthesize organic compounds from inorganic  
 8 chemicals. They form the trophic structure's foundation by producing the organic nutrients and  
 9 energy used by consumers. Primary producers in lake systems include phytoplankton, aquatic  
 10 macrophytes, and periphyton. Of the three, phytoplankton are the major producers in all but  
 11 very shallow lakes. Figure 3-10 below illustrates the trophic structure of the interconnected  
 12 reservoirs.



13  
 14 **Figure 3-10 Trophic Structure of the Monticello and Parr Reservoirs**

15 Plankton

16 Plankton are small and often microscopic organisms that drift or float in the water column.  
 17 Phytoplankton are single-celled plant plankton and include diatoms (single-celled, yellow algae)  
 18 and dinoflagellates (a single-celled organism with two flagella). Phytoplankton live suspended in  
 19 the water column and occur in the limnetic (open water) zone of a lake.

20 Zooplankton are animals that either spend their entire lives as plankton (e.g., holoplankton) or  
 21 exist as plankton for a short time during development (e.g., meroplankton). Zooplankton include  
 22 rotifers, isopods, protozoans, marine gastropods, polychaetes, small crustaceans, and the eggs  
 23 and larval stages of insects and other aquatic animals.

1 Macrophytes and Periphyton

2 Aquatic macrophytes are large plants, both emergent and submerged, that inhabit shallow water  
 3 areas. Periphyton consist of single-celled or filamentous species of algae that attach to benthic  
 4 or macrophytic surfaces. Macrophytes and periphyton occur in the littoral (nearshore and  
 5 shallow) zone. They tend to be highly productive because they have more access to nutrients  
 6 through their roots compared to phytoplankton.

7 Benthic Invertebrates

8 Benthic invertebrates inhabit the bottom of rivers and mainly consume periphyton. They include  
 9 certain zooplankton and macroinvertebrates such as insects, mussels, crayfish, snails, clams,  
 10 and polychaetes. Benthic invertebrates are primary consumers and are an important indicator of  
 11 the health of an aquatic system. The SCDNR’s 2007 freshwater mussel surveys, which included  
 12 sites in the Parr Reservoir, identified four species across multiple size and age classes  
 13 (Table 3-11 below) (Price 2010-TN10451). Two of the species are State species of greatest  
 14 conservation need, but none are federally listed. Dominion’s 2015 freshwater mussel surveys in  
 15 the Monticello Reservoir identified six species across multiple size and age classes (Three Oaks  
 16 Engineering 2016-TN10452). Three of the species are State species of greatest conservation  
 17 need, but none are federally listed. The Carolina creekshell occurrence in the Monticello  
 18 Reservoir may have been misidentified, as this species had never been seen in the reservoir  
 19 before, and it is unlikely to be found outside of a stream habitat (Price 2010-TN10451).

20 **Table 3-11 Freshwater Mussel Species Observed during Surveys Conducted at the**  
 21 **Monticello and Parr Reservoirs in 2007 and 2015**

Common Name	Species	SGCN Priority (2015)	Monticello Reservoir	Parr Reservoir (2007)
common elliptio	<i>Elliptio complanate</i>	Moderate	-	Present
Carolina lance	<i>Elliptio angustata</i>	Moderate	Present	-
yellow lance	<i>Elliptio lanceolate</i>	None	-	Present
eastern floater	<i>Pyganadon catacta</i>	None	Present	-
Florida pondhorn	<i>Uniomerus carolinianus</i>	None	Present	Present
paper pondshell	<i>Utterbackia imbecillis</i>	None	Present	
eastern creekshell	<i>Villosa delumbis</i>	Moderate	Present	Present
Carolina creekshell	<i>Villosa vaughaniana</i>	Highest	Present	-

SGCN = State species of greatest conservation need.

“-” denotes no entry in the table cell.

Adapted from FERC 2020-TN10457.

22 Ichthyoplankton

23 Ichthyoplankton are the eggs and larvae of fish. SCDHEC sampled ichthyoplankton from three  
 24 stations in the Monticello Reservoir from October 1983 to September 1984 as part of a CWA  
 25 Section 316(b) technology demonstration (Dominion 2024-TN10391: Enclosure 3). Researchers  
 26 identified 17 different species of larval fish from six families overall. SCDHEC used a towed  
 27 plankton net, with clupeid (primarily gizzard shad, 83 percent) being most abundant, followed  
 28 distantly by smaller numbers of yellow perch (7.5 percent), white bass, crappie, sunfish,  
 29 minnows, and suckers.

30 Normandeau Associates, Inc. collected ichthyoplankton samples for Dominion from 2008 to  
 31 2009 near the existing intake at V.C. Summer on the Monticello Reservoir using towed bongo

1 nets (Dominion 2024-TN10391: Enclosure 4). Dominion did not collect any fish eggs, likely  
2 because the species present have eggs that remain on the bottom of the reservoir. Dominion  
3 collected fish larvae only from March through August, with a peak in May. Threadfin shad were  
4 the most abundant, making up 71 percent of the total, followed by white perch (13 percent),  
5 Clupeidae (undetermined either threadfin shad or gizzard shad, 12 percent), and gizzard shad  
6 (2 percent). Black crappie, darter, yellow perch, suckers, Cyprinidae (minnow and carp), and  
7 *Lepomis* sp. (sunfish) made up the remaining 2 percent.

8 In 2016, researchers from Normandeau Associates, Inc. again sampled ichthyoplankton near  
9 the intake at V.C. Summer using towed bongo nets (Dominion 2024-TN10391: Enclosure 5).  
10 These collections, occurring from March to August, found the same seven families of fish as the  
11 2009 study, which was one more (Ictaluridae e.g., bullhead, catfish) than the original sampling  
12 in 1985. Clupeids (e.g., threadfin and gizzard shad) again dominated samples (86 percent),  
13 followed by sunfish (10 percent), Cyprinidae (2 percent), and suckers, catfish, bass, and perch  
14 making up the remaining 2 percent.

15 The dominant fish species, both threadfin shad and gizzard shad, are important prey species.  
16 Although threadfin shad is a nonnative species introduced by fishery managers to supplement  
17 forage fish populations, it is a valuable prey species due to its small size. The threadfin shad is  
18 a semi-tropical species that would tend to die off during cold winters, but the warm effluents  
19 from V.C. Summer allow the shad to establish a stable community (Kleinschmidt 2013-  
20 TN10455).

#### 21 Juvenile and Adult Fish

22 In 1983 and 1984, shortly after the plant began operating, SCE&G used gill nets and  
23 electrofishing to conduct a comprehensive survey of the fish community in the Monticello  
24 Reservoir to support of the station's CWA Section 316(a) demonstration. Biologists collected 32  
25 different species of fish which were dominated by sunfish (Centrarchids, 55 percent) and  
26 Clupeids (28 percent) (Dominion 2024-TN10391: Enclosure 3). They also found smaller  
27 numbers of catfish (Ictalurids, 7 percent), suckers (Catastomids, 5 percent), and perch (Percids,  
28 3 percent). These abundances were similar to pre-operational fish surveys conducted by  
29 SCE&G in 1978.

30 From 1987 to 1989, SCDNR conducted cove rotenone sampling in the Monticello Reservoir  
31 (Nash et al. 1990-TN10456). They blocked off three coves with 0.4 in. (9.5 mm) mesh netting,  
32 collecting 24 different species of fish and estimated a standing stock of 183 lb (83 kg) of fish per  
33 acre. The most dominant fish were bluegill, channel catfish, gizzard shad, and white catfish  
34 (Table 3-12). The abundance data indicated prey is available for all size groups of predators in  
35 the reservoir with major prey species including bluegill, threadfin shad, and yellow perch.  
36 Predator species include largemouth bass, black crappie, larger catfish, and white bass (Nash  
37 et al. 1990-TN10456).

38 Dominion conducted fish sampling, using electrofishing and gill nets, from 2007 to 2009 in both  
39 the Monticello and Parr Reservoirs, and again in 2012 for only the Parr Reservoir as part of the  
40 application for the Parr hydropower license (FERC 2020-TN10457). Dominion documented  
41 24 warmwater species of fish in Monticello Reservoir and 30 species of warmwater fish in Parr  
42 Reservoir (Table 3-12). Similar abundances were reported in both reservoirs with the exception  
43 of channel catfish being more abundant in the Parr Reservoir.

44 SCDNR also conducts yearly spring electrofishing sampling that targets black bass species. In  
45 2014, SCDNR only collected largemouth bass across three sites within the Monticello

1 Reservoir. In 2015, researchers collected largemouth bass and smallmouth bass, although  
 2 smallmouth bass comprised less than 5 percent of individuals collected. Since 2020, in addition  
 3 to smallmouth and largemouth bass, SCDNR has also collected small numbers of Alabama  
 4 bass, Bartram’s bass, and hybrids, identified using genetic samples (SCDNR 2024-TN10524).

5 **Table 3-12 Fish Species and Abundance in the Monticello and Parr Reservoirs during**  
 6 **Sampling by South Carolina Department of Natural Resources (1987–1989)**  
 7 **and Dominion (2007–2009, and 2012)**

Species	Scientific Name	Monticello	Parr	Average Abundance (percent) SCDNR 1987–1989	Impingement Abundance (percent) SCE&G 2005–2006
bluegill	<i>Lepomis macrochirus</i>	Present	Present	24	-
channel catfish	<i>Ictalurus punctatus</i>	Present	Present	21	11.8
gizzard shad	<i>Dorosoma cepedianum</i>	Present	Present	18	-
white catfish	<i>Ameiurus catus</i>	Present	Present	14	-
threadfin shad	<i>Dorosoma petenense</i>	Present	Present	5	50.2
yellow perch	<i>Perca flavescens</i>	Present	Present	5	6.1
silver redhorse	<i>Moxostoma anisurum</i>	Present	-	2	-
river carpsucker	<i>Carpionodes carpio</i>	Present	-	2	-
largemouth bass	<i>Micropterus salmoides</i>	Present	Present	2	-
pumpkinseed	<i>Lepomis gibbosus</i>	Present	Present	2	-
black crappie	<i>Pomoxis nigromaculatus</i>	Present	Present	2	-
redeer sunfish	<i>Lepomis microlophus</i>	Present	Present	1	-
blue catfish	<i>Ictalurus furcatus</i>	Present	Present	0.8	12.2
warmouth	<i>Lepomis gulosus</i>	Present	Present	0.4	-
shorthead redhorse	<i>Moxostoma macrolepidotum</i>	Present	-	0.3	-
white bass	<i>Morone chrysops</i>	Present	Present	0.3	-
whitefin shiner	<i>Cyprinella nivea</i>	Present	Present	0.2	-
white crappie	<i>Pomoxis annularis</i>	Present	-	0.1	-
golden shiner	<i>Notemigonus crysoleucas</i>	Present	Present	0.06	-
silvery minnow	<i>Hybognathus amarus</i>	Present	-	0.03	-
flat bullhead	<i>Ameiurus platycephalus</i>	Present	Present	0.03	-
redbreast sunfish	<i>Lepomis auritus</i>	Present	Present	0.03	-
longnose gar	<i>Lepisosteus osseus</i>	Present	Present	Trace	-
snail bullhead	<i>Ameiurus brunneus</i>	Present	-	Trace	-
gambusia	<i>Gambusia affinis</i>	Present	-	Trace	-
tessellated darter	<i>Etheostoma olmstedii</i>	Present	-	Trace	-
white perch	<i>Morone americana</i>	Present	Present	0	9.4
sandbar shiner	<i>Notropis scepcticus</i>	-	Present	-	-

8



1 **Table 3-12 Fish Species and Abundance in the Monticello and Parr Reservoirs during**  
 2 **Sampling by South Carolina Department of Natural Resources (1987–1989)**  
 3 **and Dominion (2007–2009, and 2012) (Continued)**

Species	Scientific Name	Monticello	Parr	Average Abundance (percent) SCDNR 1987–1989	Impingement Abundance (percent) SCE&G 2005–2006
spottail shiner	<i>Notropis hudsonius</i>	Present	Present	-	-
highfin carpsucker	<i>Carpionodes velifer</i>	-	Present	-	-
northern hogsucker	<i>Hypentelium nigricans</i>	Present	Present	-	-
notchlip redhorse	<i>Moxostoma collapsum</i>	Present	Present	-	-
quillback	<i>Carpionodes cyprinus</i>	Present	Present	-	-
robust redhorse	<i>Moxostoma robustum</i>	Present	Present	-	-
shorthead redhorse	<i>Moxostoma macrolepidotum</i>	Present	Present	-	-
flathead catfish	<i>Pylodictis olivaris</i>	-	Present	-	-
yellow bullhead	<i>Ameiurus natalis</i>	Present	Present	-	-
smallmouth bass	<i>Micropterus dolomieu</i>	Present	Present	-	-
Alabama bass	<i>Micropterus henshalli</i>	Present	-	-	-
Bartram's bass	<i>Micropterus sp. cf. cataractae</i>	Present	-	-	-

SCDNR = South Carolina Department of Natural Resources; SCE&G = South Carolina Electric and Gas.

“-” denotes no data in table cell.

Sources: Nash et al. 1990-TN10456 and FERC 2020-TN10457.

4 **3.7.2.2 Important Species and Habitats**

5 This section summarizes important Monticello Reservoir fisheries, as well as State-protected  
 6 and other special status species.

7 **Commercially Important Fisheries**

8 There are no commercial fisheries in the Monticello or Parr Reservoirs (SCDNR 2014-  
 9 TN10458).

10 **Recreationally Important Fisheries**

11 The Monticello Reservoir is managed by SCDNR for recreational fishing activities and bass  
 12 tournaments are held there throughout the year. Popular sport fish on the Monticello Reservoir  
 13 include catfish species such as blues, channels, whites, yellows, and flat bullhead catfish. Other  
 14 popular game fish include largemouth bass, black and white crappies, white bass, and bream  
 15 species such as bluegill, redear, and redbreast (SCDNR 2014-TN10459).

16 SCDNR collected data from the winter of 1987 through the spring of 1990 to assess the annual  
 17 fishing effort on the Monticello Reservoir, also called Lake Monticello (Nash et al. 1990-  
 18 TN10456). The average estimated annual fishing effort for the reservoir is 45,818 fishing hours

1 or 6.7 hours per acre. Fishing varied by season with fishing effort being highest in the spring at  
2 2.5 hours per acre, slightly lower in spring and fall at 1.5 to 1.6 hours per acre, and lowest in the  
3 winter at just 1.1 hours per acre. Most of the fishing effort in the reservoir is spent fishing for  
4 catfish (36 percent) or largemouth bass (34 percent) with a smaller amount spent on crappie  
5 (24 percent), bluegill (3 percent), and white bass (2 percent). The fish that recreational fishers  
6 target changes by season depending on specific species traits. Annual catch per unit effort  
7 (CPUE) estimates for the Monticello Reservoir are 0.65 fish per hour or 0.44 lb per hour. At the  
8 time of this survey there was no length limit on largemouth bass although now the bass limit is  
9 for fish larger than 14 in. (36 cm) in total length (SCDNR 2014-TN10458).

10 The Broad River is broken up by numerous shoals which limits boating access to fishing and, as  
11 a result, most fishing is done by kayak, canoe, or flat bottom boat. Freshwater game fish  
12 include: bream: bluegill, flier (*Centrarchus macropterus*), green sunfish (*Lepomis cyanellus*),  
13 pumpkinseed, redbreast, redear (shellcracker), spotted sunfish (*Lepomis punctatus*), warmouth;  
14 black bass: largemouth bass, smallmouth bass, redeye bass (Bartrams) and any other species  
15 of the genus *Micropterus*; striped bass or rockfish; white bass; hybrid striped bass; white  
16 crappie; black crappie; trout: rainbow (*Oncorhynchus mykiss*), brown (*Salmo trutta*), brook  
17 (*Salvelinus fontinalis*) and their hybrids; chain pickerel (jackfish, *Esox niger*); redbfin pickerel  
18 (*Esox americanus*); sauger (*Sander canadensis*), walleye (*Sander vitreus*), and yellow perch  
19 (SC eRegs 2024-TN10829).

#### 20 State-Protected and Other Special Status Species

21 The SCDNR has regulatory authority for fish and wildlife in South Carolina under South Carolina  
22 Code of Laws, Title 50. The SCDNR also has the authority to implement rules to protect species  
23 that it deems as endangered at the State level (SC Code of Law § 50-TN10460). Under these  
24 rules, “endangered” means any species or subspecies of wildlife whose prospects of survival or  
25 recruitment within the State are in jeopardy or are likely within the foreseeable future to become  
26 so. The Carolina pygmy sunfish (*Elassoma boehlkei*) is a State-listed species of conservation  
27 concern (SCDNR 2015-TN10461) with only a few populations known to exist in South Carolina.  
28 There is one population in Big Pine Tree Creek, part of the Santee River Basin, and a few  
29 populations in the Waccamaw River in Horry County and Georgetown, South Carolina. The  
30 Carolina pygmy sunfish are abundant where they are found; however, there have been no  
31 reported Carolina pygmy sunfish in the Monticello or Parr Reservoirs, or the Broad River Basin  
32 (SCDNR 2015-TN10461).

33 The shortnose sturgeon (*Acipenser brevirostrum*), a federally and State-listed endangered  
34 species, inhabits major rivers along the Atlantic coast from Georgia to Canada. While this  
35 species is anadromous and moves between fresh and salt water for reproduction, they appear  
36 to rarely leave the river in which they were spawned (SCDNR 2020-TN10462). In South  
37 Carolina, shortnose sturgeon populations have been observed in various rivers including the  
38 Savannah River, one or more of the rivers flowing into St. Helena Sound (Ashepoo, Combahee,  
39 and Edisto Rivers), the Cooper River, the Santee River, and one or more Winyah Bay rivers  
40 (Pee Dee, Waccamaw, and Black). There may also be a landlocked (“damlocked”) population in  
41 the Santee-Cooper Lake System. There have been no reported shortnose sturgeon in the Broad  
42 River Basin (SCDNR 2020-TN10462).

#### 43 3.7.2.3 *Invasive and Nuisance Species*

44 Nonnative species are those species that are present only because of introduction and that  
45 would not naturally occur either currently or historically in an ecosystem. Invasive species are  
46 nonnative organisms whose introduction causes, or is likely to cause, economic or

1 environmental harm or harm to human, animal, or plant health (81 FR 88609-TN8375). For  
2 purposes of this discussion, nuisance species are nonnative species that alter the environment  
3 but that do not rise to the level of invasive.

4 The primary invasive species concern related to V.C. Summer operations is biofouling of the  
5 cooling water intake system by invasive bivalves, such as Asian clams (*Corbicula fluminea*),  
6 which were first identified in the Monticello and Parr Reservoirs in 1979 (Counts 1985-  
7 TN10463). Dominion uses chemical additives approved by the SCDHEC to control pH, scale,  
8 and corrosion in the circulating water system, and to control biofouling of nuclear power plant  
9 equipment (Dominion 2023-TN10387).

10 In 2020 and 2021, during broodstock collections of smallmouth bass, SCDNR conducted  
11 genetic analysis. The results of the genetic analysis indicated, for the first time, the presence of  
12 Alabama bass and Bartram's bass genes in smallmouth bass hybrids (Sammons et al. 2023-  
13 TN10471). Both the Alabama bass and Bartram's bass are nonnative species to the Broad  
14 River watershed, although both have been spread to reservoirs, lakes, and rivers across the  
15 south and southeast, especially Alabama bass due to the popularity of bass fishing. Data  
16 collected from reservoirs across the southeast suggest that Alabama bass can outcompete  
17 largemouth bass and will hybridize with non-largemouth bass, black bass species (Sammons  
18 et al. 2023-TN10471).

### 19 **3.7.3 Proposed Action**

20 As described in the 2024 LR GEIS (NRC 2024-TN10161) and cited in Table 3-1 of this SEIS,  
21 the impacts of all Category 1 (generic) aquatic resources would be SMALL. The NRC staff's  
22 review did not identify any new and significant information that would change the conclusion in  
23 the LR GEIS. Thus, consistent with the conclusions in the LR GEIS for these Category 1  
24 (generic) issues, the impacts of continued operation of V.C. Summer on aquatic resources  
25 would be SMALL. Table 3-2 of this SEIS identifies two Category 2 issues that require  
26 site-specific analysis for each proposed LR to determine whether impacts would be SMALL,  
27 MODERATE, or LARGE. These issues are (1) impingement mortality and entrainment of  
28 aquatic organisms (plants with once-through cooling systems or cooling ponds) and (2) effects  
29 of thermal effluents on aquatic organisms (plants with once-through cooling systems or cooling  
30 ponds). The sections below analyze these issues in detail.

#### 31 **3.7.3.1 *Impingement Mortality and Entrainment of Aquatic Organisms (Plants with*** 32 ***Once-Through Cooling Systems or Cooling Ponds)***

33 For plants with once-through cooling systems or cooling ponds such as V.C. Summer, the NRC  
34 staff determined in the 2024 LR GEIS that impingement and entrainment of aquatic organisms  
35 is a Category 2 issue that requires plant-specific evaluation (NRC 2024-TN10161).

36 Impingement occurs when organisms are trapped against the outer part of an intake structure's  
37 screening device (79 FR 48300-TN4488). The force of the intake water traps the organisms  
38 against the screen, and individuals are unable to escape. Impingement can kill organisms  
39 immediately or cause exhaustion, suffocation, injury, and other physical stresses that contribute  
40 to mortality later. The potential for injury or death is generally related to the amount of time an  
41 organism is impinged, its fragility (susceptibility to injury), and the physical characteristics of the  
42 screen wash and fish return systems of the intake structure. The EPA has found that  
43 impingement mortality (IM) is typically less than 100 percent if the cooling water intake system  
44 includes fish return or backwash systems (79 FR 48300-TN4488). Because impingeable

1 organisms are typically fish with fully formed scales and skeletal structures and well-developed  
2 survival traits, such as behavioral responses to avoid danger, many impinged organisms can  
3 survive under proper conditions (79 FR 48300-TN4488).

4 Entrainment occurs when organisms pass through the screening device and travel through the  
5 entire cooling system, including the pumps, condenser or heat exchanger tubes, and discharge  
6 pipes (79 FR 48300-TN4488). Organisms susceptible to entrainment are of smaller size, such  
7 as ichthyoplankton, larval stages of shellfish and other macroinvertebrates, zooplankton, and  
8 phytoplankton. During travel through the cooling system, entrained organisms experience  
9 physical trauma and stress, pressure changes, excess heat, and exposure to chemicals  
10 (Mayhew et al. 2000-TN8458). Because organisms that get entrained generally possess fragile  
11 life stages (e.g., eggs, which exhibit poor survival after interaction with cooling water intake  
12 structure; or early larvae, which lack a skeletal structure and swimming ability), the EPA has  
13 concluded that for purposes of assessing the impacts of a cooling water intake system on the  
14 aquatic environment, all entrained organisms are assumed to die (79 FR 48300-TN4488).

15 Entrainment susceptibility is highly dependent on life history characteristics. For example,  
16 broadcast spawners with non-adhesive, free-floating eggs that drift with the water current may  
17 become entrained in a cooling water intake system. Nest building species or species with  
18 adhesive, demersal eggs are less likely to be entrained in early life stages. Susceptibility of  
19 larval life stages to entrainment depends on body morphology and swimming ability.

20 A species can be susceptible to both impingement and entrainment if several life stages of the  
21 species occupy the same source water. For instance, adults and juveniles of a given species of  
22 fish may be impinged against the intake screens, while larvae and eggs may pass through the  
23 screening device and be entrained through the cooling system. The susceptibility to either  
24 impingement or entrainment relates to the size of the individual relative to the size of the mesh  
25 on the screening device. The EPA considers aquatic organisms that can be collected or  
26 retained on a sieve with 0.56 in. (1.4 cm) diagonal openings to be susceptible to impingement  
27 (79 FR 48300-TN4488). This equates to screen device mesh openings of 0.5 in. × 0.25 in.  
28 (1.3 cm × 0.635 cm), which is slightly larger than the openings on the typical 0.375 in. (0.95 cm)  
29 square mesh found at many nuclear power plants. Organisms smaller than the 0.56 in. (1.4 cm)  
30 mesh are considered susceptible to entrainment.

31 The magnitude of the impact that impingement and entrainment create on the aquatic  
32 environment depends on the plant-specific characteristics of the cooling system as well as the  
33 local aquatic community. Relevant nuclear power plant-based characteristics include location of  
34 the cooling water intake structure, intake velocities, withdrawal volumes, screening device  
35 technologies, and the presence or absence of a fish return system. Relevant characteristics of  
36 the aquatic community include species present in the environment, life history characteristics,  
37 population abundances and distributions, special species statuses and designations, and  
38 regional management objectives.

### 39 V.C. Summer Cooling Water Intake System

40 The V.C. Summer cooling water intake system impinges and entrains aquatic organisms as it  
41 withdraws water from the Monticello Reservoir. Section 2.1.3 of this SEIS describes the  
42 V.C. Summer cooling and auxiliary water systems in detail. Features relevant to the  
43 impingement and entrainment analysis are summarized below.

44 Monticello Reservoir water is drawn into the cooling water intake structure at one of three pump  
45 bays, each with two entrances. Each entrance is 4 m (13 ft) wide and 8 m (25.5 ft) high,

1 extending from the bottom of the pump house to the bottom of the skimmer wall. The entrances  
2 are equipped with vertical traveling screens (mesh size 1.0 × 0.89 cm [0.4 × 0.35 in.]) and two  
3 sets of trash racks of conventional design (NRC 1981-TN10472). Intake velocity is 1.31 feet per  
4 second (fps) (0.4 m/s) through the traveling screens (Dominion 2023-TN10387). Organisms that  
5 are too large to pass through the traveling screen mesh, such as juvenile and adult fish not able  
6 to swim away as well as shellfish, could become impinged on the screens. V.C. Summer does  
7 not have a fish return system, so all impinged organisms are either collected at the trash racks  
8 or on the traveling screens and are disposed of as solid waste along with other debris.

9 Organisms small enough to pass through the traveling screen mesh, such as fish eggs, larvae,  
10 and other zooplankton, are entrained into the cooling water system and pass through the entire  
11 system. After leaving the condensers, circulating water moves via a 3.7 m (12 ft) diameter pipe  
12 from the plant to a semi-enclosed discharge basin. From the basin, the heated effluent moves  
13 through a 305 m (1,000 ft) long discharge canal to the Monticello Reservoir. The discharge  
14 canal directs the discharge flow (heated effluent) to the northeast. A 790 m (2,600 ft) long jetty  
15 prevents the recirculation of the heated water. During this process, entrained organisms are  
16 subject to mechanical, thermal, and toxic stresses.

#### 17 Clean Water Act Section 316(b) Requirements for Existing Facilities

18 Section 316(b) of the CWA addresses the adverse environmental impacts caused by the intake  
19 of cooling water from waters of the United States. This section of the CWA grants the EPA the  
20 authority to regulate cooling water intake structures to minimize adverse impacts on the aquatic  
21 environment. Under CWA Section 316(b), the EPA has issued regulations for existing facilities,  
22 such as V.C. Summer, at 40 CFR Part 122 (TN2769) and 40 CFR Part 125 (TN254), Subpart J.  
23 Existing facilities include power generation and manufacturing facilities that are not new facilities  
24 as defined at 40 CFR 125.83 (TN254) and that withdraw more than 2 MGD (7.6 million liters per  
25 day) of water from waters of the United States and use at least 25 percent of the water they  
26 withdraw exclusively for cooling purposes.

27 Under the CWA Section 316(b) regulations, the location, design, construction, and capacity of  
28 cooling water intake structures of regulated facilities must reflect the best technology available  
29 (BTA) for minimizing impingement mortality and entrainment. The EPA, or authorized States  
30 and Tribes, impose BTA requirements through NPDES permitting programs. In South Carolina,  
31 the SCDHEC administers the NPDES program and issues NPDES permits to regulated  
32 facilities.

33 With respect to IM, the BTA standard requires that existing facilities comply with one of the  
34 following seven alternatives (40 CFR 125.94(c) [TN254]):

- 35 1. operate a closed-cycle recirculating system, as defined at 40 CFR 125.92(c) (herein referred  
36 to as "IM Option 1")
- 37 2. operate a cooling water intake structure that has a maximum through-screen design intake  
38 velocity of 0.5 fps (0.15 m/s)
- 39 3. operate a cooling water intake structure that has a maximum actual through-screen intake  
40 velocity of 0.5 fps (0.15 m/s)
- 41 4. operate an offshore velocity cap, as defined at 40 CFR 125.92(v), that was installed on or  
42 before October 14, 2014

- 1 5. operate a modified traveling screen that the NPDES Permit Director determines meets the  
2 definition at 40 CFR 125.92(s), and that the NPDES Permit Director determines is the BTA  
3 for impingement reduction at the site
- 4 6. operate any other combination of technologies, management practices, and operational  
5 measures that the NPDES Permit Director determines is the BTA for impingement reduction  
6 (herein referred to as "IM Option 6")
- 7 7. achieve a 12-month IM performance standard of all life stages of fish and shellfish of no  
8 more than 24 percent mortality, including latent mortality, for all non-fragile species

9 Options (1), (2), and (4) above are essentially preapproved technologies requiring either no  
10 demonstration or only a minimal demonstration that the flow reduction and control measures are  
11 functioning as the EPA envisioned. Options (3), (5), and (6) require more detailed information to  
12 be submitted to the permitting authority before the permitting authority may specify it as BTA for  
13 a given facility. Under Option (7), the permitting authority may also review site-specific data and  
14 conclude that a de minimis rate of impingement exists; and, therefore, no additional controls are  
15 warranted to meet the BTA IM standard.

16 With respect to entrainment, the CWA Section 316(b) regulations do not prescribe a single  
17 nationally applicable entrainment performance standard, because the EPA did not identify a  
18 technology for reducing entrainment that is effective, widely available, feasible, and does not  
19 lead to unacceptable non-water-quality impacts (79 FR 48300-TN4488). Instead, the permitting  
20 authority must establish the BTA entrainment requirement for each facility on a site-specific  
21 basis. In establishing site-specific requirements, the regulations direct the permitting authority to  
22 consider the following factors (40 CFR Part 125-TN254):

- 23 • numbers and types of organisms entrained, including, specifically, the numbers and species  
24 (or lowest taxonomic classification possible) of federally listed, threatened and endangered  
25 species, and designated critical habitat (e.g., prey base)
- 26 • impact of changes in particulate emissions or other pollutants associated with entrainment  
27 technologies
- 28 • land availability inasmuch as it relates to the feasibility of entrainment technology
- 29 • remaining useful plant life
- 30 • quantified and qualitative social benefits and costs of available entrainment technologies  
31 when information on both benefits and costs is of sufficient rigor to make a decision

32 In support of entrainment BTA determinations, facilities must conduct site-specific studies and  
33 provide data to the permitting authority to aid in its determination of whether site-specific  
34 controls would be required to reduce entrainment and which controls, if any, would be  
35 necessary.

### 36 Analysis Approach

37 When available, the NRC staff relies on the expertise and authority of the NPDES permitting  
38 authority with respect to the impacts of impingement and entrainment. Therefore, if the NPDES  
39 permitting authority has made BTA determinations for a facility pursuant to CWA Section 316(b)  
40 in accordance with the current regulations specified in 40 CFR Part 122 (TN2769) and 40 CFR  
41 Part 125 (TN254), which were promulgated in 2014 (79 FR 48300-TN4488), and the facility has  
42 implemented any associated requirements or those requirements would be implemented before  
43 the proposed SLR period, then the NRC staff assumes that adverse impacts on the aquatic

1 environment will be minimized. In such cases, the NRC staff concludes that the impacts of  
2 either impingement, entrainment, or both would be SMALL for the proposed SLR term.

3 In cases in which the NPDES permitting authority has not made BTA determinations, the NRC  
4 staff analyzes the potential impacts of impingement, entrainment, or both using a weight of  
5 evidence approach. In this approach, the staff considers multiple lines of evidence to assess the  
6 presence or absence of ecological impairment (i.e., noticeable or detectable impact) on the  
7 aquatic environment. For instance, as its lines of evidence, the NRC staff might consider  
8 characteristics of the cooling water intake system design, the results of impingement and  
9 entrainment studies performed at the facility, and trends in fish and shellfish population  
10 abundance indices. The NRC staff then considers these lines of evidence together to predict the  
11 level of impact (SMALL, MODERATE, or LARGE) that the aquatic environment is likely to  
12 experience during the proposed SLR term.

### 13 Baseline Condition of the Resource

14 For the purposes of this analysis, the NRC staff assumes that the baseline condition of the  
15 resource is the aquatic community of the Monticello Reservoir as it occurs today, which is  
16 described in Section 3.7.1 of this SEIS. All fish and benthic invertebrate populations are self-  
17 sustaining. Electrofishing, gill netting, and seining sampling indicate no major upward or  
18 downward trends in juvenile or adult fish populations (Dominion 2024-TN10391: Enclosure 3;  
19 Nash et al. 1990-TN10456; FERC 2020-TN10457). While species richness, evenness, and  
20 diversity within the community may change or shift between now and when the proposed SLR  
21 period would begin, the NRC staff finds the present aquatic community to be a reasonable  
22 surrogate in the absence of fishery and species-specific projections.

#### 23 *3.7.3.1.1 Impingement*

##### 24 Impingement Mortality BTA

25 In the 2022 NPDES permit, SCDHEC, in consultation with EPA, determined that V.C. Summer  
26 meets the administrative criteria of a closed-cycle recirculating system consistent with the  
27 definition in 40 CFR 125.92(c)(2) (Dominion 2023-TN10387: Appendix A). Under the regulatory  
28 definition, a closed-cycle recirculating system is one that passes cooling water through the  
29 condenser and other components of the cooling system and reuses the water for cooling  
30 multiple times. Such a system can include impoundments of waters of the United States where  
31 the impoundment was constructed before October 1, 2014, and was created for the purpose of  
32 serving as part of the cooling water system.

33 Monticello Reservoir was built in 1977 to supply cooling water to V.C. Summer and to serve as  
34 the upper storage reservoir for the Fairfield Pumped Storage hydroelectric facility. Accordingly,  
35 V.C. Summer is eligible to meet the IM reduction standard through Compliance Alternative 1  
36 (40 CFR 125.94(c)(1) [TN254]) described previously in this section. In the current NPDES  
37 permit, SCDHEC confirmed that V.C. Summer meets the BTA standard for IM (Dominion 2023-  
38 TN10387: Appendix A).

##### 39 Impingement Studies

###### 40 *1983–1984 Impingement Study*

41 Shortly after V.C. Summer began operation on January 1, 1983, SCE&G conducted IM studies  
42 from October 1983 to September 1984 (Dominion 2024-TN10391: Enclosure 3). Researchers  
43 collected samples at the intake structure and recorded data on the species, number, length, and  
44 weight of fish impinged on the traveling screens twice monthly. Researchers collected a total of

1 5,140 fish, weighing 68 lb (31 kg). Impingement rates were highest from January through  
2 March, likely due to colder winter temperatures.

3 The fish collected included 17 different species from six families. The most abundant was the  
4 Clupeidae family with gizzard shad making up 83 percent and threadfin shad making up  
5 1 percent of the sample. Second most abundant was the Percidae family, which made up  
6 7.6 percent of the sample, all of which were yellow perch. There were eight species of sunfish  
7 (Centrarchidae), which made up only 4.6 percent of the sample. Most of the impinged fish were  
8 young of the year or first year fish.

9 Researchers estimated 85,000 fish per year are impinged, or 1,135 lb (515 kg) of fish per year,  
10 which is 0.47 percent of the estimated fish in the Monticello Reservoir.

#### 11 *2005–2006 Impingement Study*

12 From June 2005 to June 2006, Geosyntec Consultants conducted an impingement study at the  
13 Monticello Reservoir in connection with the V.C. Summer CWA Section 316(b) requirements  
14 (Dominion 2024-TN10391: Enclosure 6). The purpose of this study was to conduct an IM  
15 characterization study by characterizing existing fish impingement at the V.C. Summer cooling  
16 water intake system (CWIS) based on bi-weekly sampling from July 12, 2005 through June 27,  
17 2006, and to develop a preliminary estimate of annual IM.

18 Researchers gathered impingement samples using a modified debris collection basket with  
19  $\frac{3}{8}$  in. (1 cm) wire mesh to match the traveling screens. They collected samples over 24-hour  
20 periods and divided them into 12-hour day and night sub-samples. In total, 52 impingement  
21 samples yielded 13 fish species (e.g., shad, catfish, bullheads, white and yellow perch, bass,  
22 and sunfish), crayfish, and freshwater grass shrimp. The fish species included two types of  
23 shad, five types of catfish or bullheads, white perch, yellow perch, and three types of bass and  
24 sunfish. Threadfin shad were the most numerous, making up 50.2 percent of the total fish count.  
25 Other common species included blue catfish, channel catfish, white perch, and yellow perch.  
26 White perch account for the largest biomass at 36.6 percent of the total catch. No rare,  
27 threatened, or endangered species were impinged during the yearlong study.

28 Most of the impinged fish were sub-adult or young of the year fish under 6.7 in. (17 cm) in total  
29 length. Threadfin shad, the most commonly impinged fish, ranged in size from less than 1.5 to  
30 4.7 in. (3.8 to 12 cm) total length. Impingement rates were highest from late December through  
31 February, a period dominated by threadfin shad. Higher impingement rates occurred at night in  
32 19 out of 26 sampling events.

33 Researchers used Monte Carlo simulation techniques to establish a baseline estimate for  
34 annual IM. After adjusting for the actual plant operations observed during the study, they  
35 determined that the 95 percent upper confidence limit for the estimated annual IM was  
36 9,154 organisms weighing a total of 272 lb (123 kg). This baseline reflects the once-through  
37 cooling system at V.C. Summer without any additional EPA required structural or operational  
38 measures specifically designed to mitigate IM and to meet BTA requirements.

#### 39 Impingement Conclusion

40 Because Compliance IM Option 1 is a preapproved alternative under CWA Section 316(b)  
41 regulations, and because the EPA and SCDHEC have confirmed that V.C. Summer meets the  
42 criteria for a closed-cycle recirculating system for purposes of CWA Section 316(b) compliance,  
43 the NRC staff finds that the adverse impacts on the aquatic environment associated with



1 impingement are minimized. This indicates that impingement is unlikely to cause noticeable or  
2 detectable impacts on Monticello Reservoir’s aquatic populations. Accordingly, the NRC staff  
3 finds that the impacts of impingement during the proposed SLR term would neither  
4 destabilize nor noticeably alter any important attribute of the aquatic environment and would,  
5 therefore, result in SMALL impacts on aquatic resources.

### 6 3.7.3.1.2 Entrainment

#### 7 Entrainment BTA

8 The CWA Section 316(b) regulations direct the permitting authority to establish BTA  
9 entrainment requirements for each facility on a site-specific basis. The 2022 NPDES permit,  
10 issued by SCDHEC, in consultation with EPA, determined that V.C. Summer meets BTA for  
11 entrainment by employing a closed-cycle recirculating cooling system per 40 CFR 125.92(c)(2)  
12 (Dominion 2023-TN10387: Appendix A).

13 SCE&G completed entrainment studies at V.C. Summer in 1983 and 1984 for the original CWA  
14 Section 316(b) study, in 2008 and 2009 and again in 2016. Threadfin shad, gizzard shad, and  
15 white perch are the most susceptible species and planktonic fish larvae is the most susceptible  
16 life stage to entrainment. These species are in abundance in the Monticello Reservoir and are  
17 very fertile. There are no threatened or endangered aquatic species or designated critical  
18 habitat present.

#### 19 Entrainment Studies

##### 20 *Entrainment Study, 1983–1984*

21 SCE&G conducted an ichthyoplankton study in the Monticello Reservoir from October 1983 to  
22 September 1984, as part of the original CWA Section 316(b) determination for V.C. Summer  
23 (Dominion 2024-TN10391: Enclosure 3). Ichthyoplankton were collected monthly at three  
24 stations in the Monticello Reservoir at the surface and middle of the water column, no samples  
25 were taken inside the V.C. Summer intake screens. Only the samples at the station closest to  
26 the V.C. Summer intake are discussed in this summary as they are the most relevant.

27 Researchers found a total larval density of 54 larvae per 100 m<sup>3</sup> (per 3531.5 cubic feet [ft<sup>3</sup>]) at  
28 the surface and 11.8 larvae per 100 m<sup>3</sup> (larvae per 3531.5 [ft<sup>3</sup>]) in the middle of the water  
29 column near the CWIS. Gizzard shad (Clupeidae) dominated, representing 94 percent of the  
30 sample, while white bass was a distant second in abundance at 5 percent. Other fish collected  
31 include minnows, suckers, sunfish, and perch. Larval fish were found in samples from February  
32 to August, and density was greatest in May. The species most susceptible to entrainment were  
33 the gizzard and threadfin shad in May and June.

##### 34 *Entrainment Study, 2008–2009*

35 Normandeau Associates, Inc. conducted an ichthyoplankton study from September 2008 to  
36 August 2009 in the Monticello Reservoir (Dominion 2024-TN10391: Enclosure 4). The purpose  
37 of this study was to provide estimates of entrainment of ichthyoplankton at the proposed  
38 V.C. Summer raw water intake structure. Samples were collected using 1.6 ft (0.5 m) diameter,  
39 0.012 in. (0.300 mm) mesh bongo nets in parallel transects near the proposed intake. Each tow  
40 was about 820 ft (250 m) long, with each side of the bongo net filtering at least 1,765 ft<sup>3</sup> (50 m<sup>3</sup>).  
41 Field composited samples ranged from 3,708 to 6,745 ft<sup>3</sup> (105 to 191 m<sup>3</sup>) in volume and were  
42 preserved in formalin. Samples were collected monthly from September to February, twice

1 monthly from March through July, and once in August for a total of 17 sampling events.  
2 Ichthyoplankton were identified by species and life stage.

3 Researchers found fish larvae present only from March to August and no fish eggs, likely  
4 because the resident species lay adhesive eggs on the lake bottom (Dominion 2024-TN10391:  
5 Enclosure 4). Fish larvae density peaked in May with 125 organisms per 100 m<sup>3</sup> (per 3531.5 ft<sup>3</sup>)  
6 and rapidly decreased to less than 1 per 100 m<sup>3</sup> (per 3531.5 ft<sup>3</sup>) by August. Threadfin shad  
7 dominated in March, April, and May with some white perch, yellow perch, darters, and black  
8 crappie also present. In June, clupeids were the dominant species, but the total density of fish  
9 larvae was only 25 percent of what it was the previous month. In July and August, the few  
10 remaining larvae were clupeids and sunfish. Based on the densities of larvae found in this  
11 study, researchers estimated 15.3 million larvae would be entrained annually under the typical  
12 water withdrawal rate, and 24.9 million under the maximum water withdrawal rate.

### 13 *Entrainment Study, 2016*

14 In the spring and summer of 2016, Normandeau Associates, Inc. conducted another  
15 ichthyoplankton study (Dominion 2024-TN10391: Enclosure 5). The purpose of the study was to  
16 collect ichthyoplankton density data from the Monticello Reservoir in the area of hydraulic  
17 influence of the V.C. Summer CWIS and then to estimate the number of ichthyoplankton  
18 potentially entrained by actual CWIS withdrawals during the fish spawning season. The CWIS  
19 area of hydraulic influence extends approximately 550 ft (168 m) out into the reservoir with a  
20 width of 250 ft (76 m) and includes any areas with a measurable flow toward the intake.  
21 Sampling was conducted using the same methods as the 2009 study with the addition of night  
22 sampling. Day sampling occurred at least 2 hours after sunrise and 2 hours before sunset, and  
23 night sampling occurred at least 2 hours after sunset and 2 hours before sunrise.

24 Researchers collected larval fish from May through August, with over half of all the fish collected  
25 in June. Clupeids comprised 86 percent of the fish collected, followed by Centrarchidae  
26 (9.6 percent), Cyprinidae (1.6 percent), and less than 1 percent each of Catostomidae,  
27 Ictaluridae, Moronidae, and Percidae. They found that mean ichthyoplankton density was  
28 typically higher at night than during the day. Researchers estimated that V.C. Summer entrained  
29 78.1 million ichthyoplankton during the night and 27.3 million ichthyoplankton during the day.  
30 The researchers estimated the yearly larval fish entrainment during this study at 105.4 million,  
31 with the highest entrainment abundance in June attributed to shad larvae.

### 32 Entrainment Conclusion

33 Because water withdrawals, and the associated risk of entrainment, would remain the same  
34 under the proposed action as under the current license, the NRC staff anticipates similar  
35 (i.e., nondetectable) effects during the proposed SLR period. Further, the SDHEC determined  
36 that V.C. Summer meets BTA for entrainment as part of issuing the 2022 NPDES permit.

37 For the reasons described above, the NRC staff finds that the impacts of entrainment of aquatic  
38 organisms resulting from the proposed SLR of V.C. Summer would be SMALL.

### 39 Impingement and Entrainment Conclusion

40 Based on the discussion summarized under “Impingement Conclusion” and “Entrainment  
41 Conclusion,” the NRC staff concludes that the impacts of impingement and entrainment on  
42 aquatic organisms resulting from the proposed V.C. Summer SLR term would be SMALL.

1 3.7.3.2 *Effects of Thermal Effluents on Aquatic Organisms (Plants with Once-Through*  
2 *Cooling Systems or Cooling Ponds)*

3 For plants with once-through cooling systems or cooling ponds such as V.C. Summer, the NRC  
4 staff determined in the LR GEIS that thermal impacts on aquatic organisms is a Category 2  
5 issue that requires plant-specific evaluation (NRC 2024-TN10161).

6 The primary form of thermal impact of concern at V.C. Summer is heat shock. Heat shock  
7 occurs when water temperature meets or exceeds the thermal tolerance of an aquatic species  
8 for some duration of the exposure (NRC 2024-TN10161). In most situations, fish can avoid  
9 areas that exceed their thermal tolerance limits, although some aquatic species or life stages  
10 lack such mobility. Heat shock is typically observable only for fish because fish tend to float  
11 when dead. In addition to heat shock, thermal plumes resulting from thermal effluent can create  
12 barriers to fish passage, which is of particular concern for migratory species. Thermal plumes  
13 can also reduce the available aquatic habitat or alter habitat characteristics in a manner that  
14 results in cascading effects on the local aquatic community.

15 V.C. Summer Effluent Discharge

16 As described in Section 3.5.1.3 of this SEIS, V.C. Summer's NPDES permit establishes thermal  
17 limits for heated effluent discharges into Monticello Reservoir (Dominion 2023-TN10387:  
18 Appendix A). V.C. Summer discharges heated effluent through a 120 ft (3.7 m) diameter pipe  
19 from the nuclear power plant to a semi-enclosed discharge bay. From the bay, the heated  
20 effluent moves through a 1,000 ft (305 m) long discharge canal to Monticello Reservoir. The  
21 discharge canal directs the discharge flow (heated effluent) to the northeast and a 2,600 ft  
22 (793 m) long jetty to the west prevents the recirculation of the heated water (Dominion 2023-  
23 TN10387). The sections below summarize thermal plume studies.

24 Clean Water Act Section 316(a) Requirements for Point Source Discharges

25 The CWA Section 316(a) addresses the adverse environmental impacts associated with thermal  
26 discharges into waters of the United States. This section of the CWA grants the EPA the  
27 authority to impose alternative, less-stringent, facility-specific effluent limits (called "variances")  
28 on the thermal component of point source discharges. To be eligible, facilities must  
29 demonstrate, to the satisfaction of the NPDES permitting authority, that facility-specific effluent  
30 limitations will assure the protection and propagation of a balanced, indigenous population of  
31 shellfish, fish, and wildlife in and on the receiving body of water. CWA Section 316(a) variances  
32 are valid for the term of the NPDES permit (i.e., 5 years). Facilities must reapply for variances  
33 with each NPDES permit renewal application. The EPA issued regulations under CWA  
34 Section 316(a) at 40 CFR 125, Subpart H (TN254).

35 Analysis Approach

36 When available, the NRC staff relies on the expertise and authority of the NPDES permitting  
37 authority with respect to thermal impacts on aquatic organisms. Therefore, if the NPDES  
38 permitting authority has made a determination under CWA Section 316(a) that thermal  
39 effluent limits are sufficiently stringent to assure the protection and propagation of a balanced,  
40 indigenous population of shellfish, fish, and wildlife in and on the receiving body of water, and  
41 that facility has implemented any associated requirements; then, the NRC staff assumes that  
42 adverse impacts on the aquatic environment will be minimized. In such cases, the NRC staff  
43 concludes that thermal impacts on aquatic organisms would be SMALL for the proposed  
44 SLR term.

1 In cases in which the NPDES permitting authority has not granted a CWA Section 316(a)  
2 variance, the NRC staff analyzes the potential impacts of thermal discharges on aquatic  
3 organisms using a weight-of-evidence approach. In this approach, the NRC staff considers  
4 multiple lines of evidence to assess the presence or absence of ecological impairment  
5 (i.e., noticeable or detectable impact) on the aquatic environment. For instance, as its lines of  
6 evidence, the NRC staff might consider characteristics of the cooling water discharge system  
7 design, the results of thermal studies performed at the facility, and trends in fish and shellfish  
8 population abundance indices. The NRC staff then considers these lines of evidence together to  
9 predict the level of impact (SMALL, MODERATE, or LARGE) that the aquatic environment is  
10 likely to experience over the course of the proposed SLR term.

#### 11 Baseline Condition of the Resource

12 For the purposes of this analysis, the NRC staff assumes that the baseline condition of the  
13 resource is the Monticello Reservoir aquatic community as it occurs today, which is described in  
14 Section 3.7.1 of this SEIS. While species richness, evenness, and diversity within the  
15 community may change or shift between now and when the proposed SLR period would begin,  
16 the NRC staff finds the aquatic community as it occurs today to be a reasonable surrogate in the  
17 absence of fishery and species-specific projections.

#### 18 Clean Water Act Section 316(a) Thermal Variance

19 The SCDHEC regulates thermal discharge temperatures at V.C. Summer through the NPDES  
20 permit (Dominion 2023-TN10387: Appendix A). In accordance with South Carolina Regulation  
21 61-68, Section E.12.c, the weekly average water temperature of all freshwater lakes shall not be  
22 increased by more than 5°F (2.8°C) above natural conditions and shall not exceed 90°F  
23 (32.2°C) from thermal discharges unless a different site-specific temperature standard has been  
24 established, a mixing zone has been established, or a Section 316(a) determination has been  
25 made under the CWA. Additionally, the 2022 NPDES permit limits the daily maximum discharge  
26 temperature to 113°F (45°C) with continuous monitoring required.

27 In 2012, Dominion conducted a thermal mixing zone evaluation as part of the NPDES  
28 wastewater permit renewal application with additional modeling completed in 2014 after  
29 SCDHEC requested additional information. This study is detailed in Section E3.6.1.2.6 of the  
30 V.C. Summer SLR ER (Dominion 2023-TN10387). In all modeled scenarios the thermal plumes  
31 due to the cooling water discharge remained entirely or predominantly to the east of the jetty  
32 that separates the V.C. Summer cooling water intake structure from the discharge and the  
33 largest thermal plume was less than 6 percent of the reservoir's surface area (Dominion 2023-  
34 TN10387). The thermal plumes also did not approach the Fairfield Pumped Storage Facility  
35 intake, the V.C. Summer cooling water intake structure, or the northern reach of the Monticello  
36 Reservoir (Dominion 2023-TN10387).

37 From the information gathered during the environmental site audit, the NRC staff understands  
38 that there have been no fish kills observed in the V.C. Summer discharge bay or adjacent areas  
39 in the last 10 years and that no further dredging of the discharge bay is anticipated during the  
40 SLR term (Dominion 2024-TN10391: Enclosure 1).

#### 41 Thermal Impacts Conclusion

42 Because SCDHEC has granted Dominion multiple, sequential NPDES permits with temperature  
43 limits that are designed to be protective of aquatic life under CWA Section 316(a) and South  
44 Carolina regulations, the NRC staff finds that the adverse impacts on the aquatic environment  
45 associated with thermal effluents are minimized. Because characteristics of the thermal effluent

1 would remain the same under the proposed action, the NRC staff anticipates similar effects  
2 during the proposed SLR period. Further, SCDHEC will continue to review the CWA  
3 Section 316(a) variance with each successive NPDES permit renewal and may require  
4 additional mitigation or monitoring in a future renewed NPDES permit if it deems such actions to  
5 be appropriate to assure the protection and propagation of a balanced, indigenous population of  
6 shellfish, fish, and wildlife in the Monticello Reservoir. The NRC staff assumes that any  
7 additional requirements that SCDHEC imposes would further reduce the impacts of the  
8 V.C. Summer thermal effluent over the course of the proposed SLR term. For these reasons,  
9 the NRC staff finds that thermal impacts during the proposed SLR period would neither  
10 destabilize nor noticeably alter any important attribute of the aquatic environment and would,  
11 therefore, result in SMALL impacts on aquatic organisms.

12 **3.7.3.3** *Water Use Conflicts with Aquatic Resources (Plants with Cooling Ponds or Cooling*  
13 *Towers Using Makeup Water from a River)*

14 Water use conflicts occur when the amount of water needed to support aquatic resources is  
15 diminished as a result of demand for agricultural, municipal, or industrial use or decreased water  
16 availability due to droughts, or a combination of these factors.

17 In the 2004 V.C. Summer LR SEIS (NRC 2004-TN7262), the NRC staff evaluated “water use  
18 conflicts (plants with cooling towers and cooling ponds using make-up water from a small river  
19 with low flow)” as a surface water quantity issue and included impacts on ecological resources,  
20 including aquatic communities. The NRC staff determined that impacts of water use conflicts  
21 would be SMALL during the initial license renewal term (i.e., 2022–2042). In 2013, the NRC  
22 issued Revision 1 of the LR GEIS (NRC 2013-TN2654) and separated out ecological impacts  
23 from surface water, expanded the issue to include cooling towers, and titled the issue “water  
24 use conflicts with aquatic resources (plants with cooling ponds or cooling towers using makeup  
25 water from a river).” The separation of these issues was continued in the 2024 Revision 2 of the  
26 LR GEIS (NRC 2024-TN10161). This section of the SEIS evaluates water use conflicts as they  
27 apply to continued operation of V.C. Summer during the proposed SLR term (i.e., 2042–2062).

28 Section 3.5.3.1 of this SEIS describes surface water use conflicts that also apply to aquatic  
29 resources. In summary, surface water flow in the Broad River as a result of the Parr  
30 Hydroelectric Project is mandated by the FERC. It mandated minimum instream flows of 150 cfs  
31 (4.2 m<sup>3</sup>/s) during most of the year and 1,000 cfs (28.3 m<sup>3</sup>/s) during the March, April, and May  
32 striped bass spawning period (Dominion 2023-TN10387; NRC 2004-TN7262). FERC did not  
33 express any concerns with the operations of V.C. Summer and its impacts on minimum flow in  
34 the Broad River (FERC 2020-TN10457). The NRC staff also analyzed surface water conflicts in  
35 Section 3.5.3.1 of this SEIS. The NRC staff did this by evaluating streamflow measurements  
36 from 1938 to 2023 and estimated that the total evaporation from the Monticello Reservoir was  
37 between 1.2 and 2 percent of mean monthly flow in the Broad River. The NRC staff concluded  
38 that the impacts of continued operation of V.C. Summer during the SLR term on regional  
39 surface water use conflicts would be SMALL because V.C. Summer operations only  
40 permanently remove a small portion of Broad River flows during an average year (2 percent or  
41 less). Thus, a high percentage (over 98 percent) of Broad River flows would remain in the river  
42 which would preserve aquatic habitats and aquatic resources.

43 The proposed SLR would continue current operating conditions and environmental stressors  
44 rather than introduce wholly new impacts. Therefore, the impacts of current operations and SLR  
45 on this resource category would be similar. For the reasons explained in this section, water use  
46 conflicts with aquatic resources would either not occur from SLR, or would be so minor that the

1 effects on aquatic resources would be undetectable. The NRC staff concludes that water use  
2 conflicts with aquatic resources during the V.C. Summer SLR term would be SMALL.

### 3 **3.7.4 No-Action Alternative**

4 If V.C. Summer were to cease operating, impacts on the aquatic environment would decrease  
5 or stop following reactor shutdown. Some withdrawal of water from the Monticello Reservoir  
6 would continue during the shutdown period to provide cooling to spent fuel in the spent fuel pool  
7 until that fuel could be transferred to dry storage. The amount of water withdrawn for these  
8 purposes would be a small fraction of water withdrawals during operations, would decrease over  
9 time, and would likely end within the first several years following shutdown. The reduced  
10 demand for cooling water would substantially decrease the effects of impingement, entrainment,  
11 and thermal effluent on aquatic organisms, and these effects would wholly cease following the  
12 transfer of spent fuel to dry storage. Effects from cold shock would be unlikely, given the small  
13 area of reservoir affected by thermal effluent under normal operating conditions, combined with  
14 the phased reductions in withdrawal and discharge of reservoir water that would occur following  
15 shutdown.

16 The NRC staff concludes that the impacts of the no-action alternative on aquatic resources  
17 would be SMALL.

### 18 **3.7.5 Replacement Power Alternatives: Common Impacts**

19 Construction impacts for many components of either replacement power alternative would be  
20 qualitatively and quantitatively similar. Construction could result in aquatic habitat loss,  
21 alteration, or fragmentation; disturbance and displacement of aquatic organisms; mortality of  
22 aquatic organisms; and increase in human access. For instance, construction-related chemical  
23 spills, runoff, and soil erosion could degrade water quality in Monticello and Parr Reservoirs and  
24 downstream by introducing pollutants and increasing sedimentation and turbidity. Dredging and  
25 other in-water work could directly remove or alter the aquatic environment and disturb or kill  
26 aquatic organisms. Because construction effects would be short term, associated habitat  
27 degradation would be relatively localized and temporary. Effects could be minimized by the use  
28 of existing infrastructure that are onsite at V.C. Summer, and the utilization of existing  
29 transmission lines, roads, parking areas, and certain buildings. Aquatic habitat alteration and  
30 loss could be minimized by siting components of the alternatives farther from water bodies and  
31 away from drainages and other aquatic features.

32 Water quality permits required through Federal and State regulations would control, reduce, or  
33 mitigate potential effects on the aquatic environment. Through such permits, the permitting  
34 agencies could include conditions requiring Dominion to follow BMPs or to take certain  
35 mitigation measures if adverse impacts are anticipated. For instance, the USACE oversees  
36 Section 404 permitting for dredge and fill activities, and SCDHEC oversees NPDES permitting  
37 and general stormwater permitting. Dominion would likely be required to obtain each of these  
38 permits to construct a new replacement power alternative on the V.C. Summer site. Notably, the  
39 EPA final rule under Phase I of the CWA Section 316(b) regulations applies to new facilities and  
40 sets standards to limit intake capacity and velocity to minimize impacts on fish and other aquatic  
41 organisms in the source water (40 CFR 125.84-TN254). Any new replacement power alternative  
42 subject to this rule would be required to comply with the associated technology standards.

43 With respect to operation of a new replacement power alternative, operational impacts for any of  
44 the alternatives would be qualitatively similar but would vary in intensity, based on each

1 alternative's water use and consumption. Non-nuclear facilities, including natural gas-fired  
2 power plants, generally consume less water during operations.

### 3 **3.7.6 Natural Gas Alternative**

4 The types of impacts that the aquatic environment would experience from this alternative  
5 involving the construction and installation of a new natural gas-fired, two-unit combustion turbine  
6 power plant are characterized in the previous section that discusses impacts common to all  
7 replacement power alternatives (see Section 3.7.5 of this SEIS).

8 This alternative would involve construction of a natural gas plant within the existing footprint of  
9 the V.C. Summer Units 2 and 3 site, which would require no additional land for construction. It  
10 would also require construction of some short onsite natural gas pipelines to connect to the  
11 existing natural gas pipeline at the V.C. Summer site. Although some infrastructure upgrades  
12 like new MDCTs may be required, it is assumed that the existing transportation and  
13 transmission line infrastructure at V.C. Summer would be adequate to support the alternative  
14 (Dominion 2023-TN10387).

15 The NRC staff finds that the impacts of construction on aquatic resources would be SMALL.  
16 During the construction phase, the construction effects would be of limited duration, the new  
17 plant would use some of the existing site infrastructure and buildings. Required Federal and  
18 State water quality permits would likely include conditions requiring BMPs and mitigation  
19 strategies to minimize environmental effects.

20 With respect to operations, Federal and State water quality permits would control and mitigate  
21 many of the potential effects on the aquatic environment. This includes operation-related water  
22 withdrawal and discharge in a manner in which the associated effects would be unlikely to  
23 destabilize or noticeably alter any important attribute of the aquatic environment. Therefore, the  
24 NRC staff finds that the impacts of operation on aquatic resources would be SMALL.

25 Based on the above, the NRC staff concludes that the impacts on aquatic resources from  
26 construction and operation of a natural gas alternative would be SMALL.

### 27 **3.7.7 New Nuclear (Small Modular Reactor) Alternative**

28 This alternative would involve the installation and operation of two, 12-unit SMRs. A closed-  
29 cycle cooling system using mechanical draft cooling towers would withdraw makeup water from  
30 the existing Monticello Reservoir (Dominion 2023-TN10387).

31 The types of impacts that the aquatic environment would experience from this alternative would  
32 likely be similar to those described in the previous section discussing impacts common to all  
33 replacement power alternatives (see Section 3.7.5 of this SEIS). The SMR power plant would  
34 be built at the abandoned V.C. Summer Units 2 and 3 project site so they could use existing  
35 V.C. Summer infrastructure. The NRC staff concludes that these effects would be SMALL to  
36 MODERATE, depending on the extent to which construction would degrade, modify, or  
37 permanently alter nearby aquatic habitats. Required Federal and State water quality permits  
38 would likely include conditions requiring BMPs and mitigation strategies to minimize  
39 environmental effects.

40 With respect to operation, Federal and State water quality permits would control and mitigate  
41 many of the potential effects on the aquatic environment, including water withdrawals and

1 discharges, such that the associated effects would be unlikely to noticeably alter or destabilize  
2 any important attribute of the aquatic environment. The NRC staff finds that the impacts of  
3 operation of a new nuclear alternative would be SMALL.

4 Based on the above, the NRC staff concludes that the impacts on aquatic resources from  
5 construction and operation of a new nuclear alternative would be SMALL to MODERATE.

### 6 **3.7.8 Natural Gas and Solar Combination Alternative**

7 This alternative would involve the construction and operation of a new natural gas-fired, two-unit  
8 combustion turbine power plant built at the abandoned V.C. Summer Unit 2 and Unit 3 project  
9 site, solar installation with battery storage located both on and offsite (Dominion 2023-  
10 TN10387).

11 The impacts of construction of new solar and natural gas of this alternative are discussed in the  
12 section that describes common impacts on all alternatives and impacts of the natural gas  
13 alternative (Sections 3.7.5 and 3.7.6). These effects would be SMALL to MODERATE,  
14 depending on the site(s) selected, the aquatic habitats present, and the extent to which  
15 construction would degrade, modify, or permanently alter those habitats.

16 The operation of the solar photovoltaic component would have no discernable effects on the  
17 aquatic environment. Impacts of operating a new natural gas power plant would be SMALL  
18 because the water withdrawals and discharges would be regulated under the CWA and  
19 applicable State regulations to ensure that impacts to the aquatic environment are minimal.  
20 Impacts of the small amount of additional power generation from existing natural gas plants  
21 would be SMALL since the water withdrawals and discharges would be managed by the  
22 SCDHEC.

23 Based on the above, the NRC staff concludes that the impacts on aquatic resources for the  
24 natural gas and renewables alternative would be SMALL to MODERATE during construction  
25 and SMALL during operation. Impacts from the alternative would be managed and regulated by  
26 Federal and State water quality permits.

### 27 **3.7.9 New Nuclear and Solar Combination Alternative**

28 The types of impacts that the aquatic environment would experience from the SMR portion of  
29 the combination alternative are characterized in the previous sections discussing impacts  
30 common to all alternatives and impacts of the new nuclear alternative (see Section 3.7.5 and  
31 3.7.7 of this SEIS). Construction and operation impacts of this portion of the combination  
32 alternative would be qualitatively similar. Because the nuclear portion of the combination  
33 alternative would involve construction and operation of one SMR facility instead of two, less  
34 cooling water would be required, which would result in fewer impacts on the aquatic  
35 environment. Therefore, the NRC staff finds that the impacts of construction and operation of  
36 the SMR portion of the combination alternative on aquatic resources would be SMALL.

37 Impacts of constructing the solar installation with battery storage portion of the combination  
38 alternative are also addressed in the previous section discussing impacts common to all  
39 alternatives. These impacts would be SMALL to MODERATE, depending on the site(s)  
40 selected, the aquatic habitats present, and the extent to which construction would degrade,  
41 modify, or permanently alter those habitats. Operation of the solar PV portion would have no  
42 discernable effects on the aquatic environment.



1 The NRC staff concludes that the impacts on aquatic resources from construction and operation  
2 of a combination alternative would be SMALL to MODERATE during construction and SMALL  
3 during operation.

### 4 **3.8 Federally Protected Ecological Resources**

5 The NRC must consider the effects of its actions on the ecological resources protected under  
6 several Federal statutes and must consult with the FWS or the National Oceanic and  
7 Atmospheric Administration (NOAA) prior to acting in cases where an agency action may affect  
8 those resources. These statutes include the following:

- 9 • ESA (16 U.S.C. § 1531 et seq.) (TN1010)
- 10 • Magnuson–Stevens Fishery Conservation and Management Act (MSA), as amended  
11 (16 U.S.C. § 1801 et seq.) (TN9966)
- 12 • National Marine Sanctuaries Act (NMSA) (16 U.S.C. § 1431 et seq.) (TN4482)

13 This section describes the species and habitats that are federally protected under these statutes  
14 and analyzes how the proposed SLR and alternatives may affect these resources.

#### 15 **3.8.1 Endangered Species Act**

16 Congress enacted the ESA in 1973 to protect and recover imperiled species and the  
17 ecosystems upon which they depend. The ESA provides a program for the conservation of  
18 endangered and threatened plants and animals (collectively, “listed species”) and the habitats in  
19 which they are found. The FWS and National Marine Fisheries Service (NMFS) are the lead  
20 Federal agencies for implementing the ESA, and these agencies determine the species that  
21 warrant listing. The following sections describe the V.C. Summer action area and the species  
22 and habitats that may occur in the action area under each of the Services’ jurisdictions.

##### 23 *3.8.1.1 Endangered Species Act: Action Area*

24 The implementing regulations for Section 7(a)(2) of the ESA define “action area” as all areas  
25 affected directly or indirectly by the Federal action and not merely the immediate area involved  
26 in the action (50 CFR Part 402-TN4312). The action area effectively bounds the analysis of  
27 federally listed species and critical habitats because only species and habitats that occur within  
28 the action area may be affected by the Federal action.

29 For the purposes of assessing the potential impacts of the proposed V.C. Summer SLR, the  
30 NRC staff considers the action area to consist of the following:

##### 31 V.C. Summer Site

32 The terrestrial region of the action area consists of approximately 2,200 ac (890 ha) within the  
33 V.C. Summer site in Fairfield County, South Carolina. The site is situated on the southern shore  
34 of the Monticello Reservoir. It includes developed land supporting nuclear power plant  
35 operations (1,156 ac [468 ha]), deciduous forest (58 ac [24 ha]), evergreen forest (421 ac  
36 [170 ha]), mixed forest (54 ac [22 ha]), shrub/scrub (153 ac [62 ha]), grassland/herbaceous  
37 (74 ac [30 ha]), woody wetlands (2 ac [1 ha]), emergent herbaceous wetlands (2 ac [1 ha]), and  
38 cultivated lands (55 ac [22 ha]) (Dominion 2023-TN10387). Sections 3.2 and 3.6 of this SEIS  
39 describe the developed and natural features of the site and the characteristic vegetation and  
40 habitats.

1 Monticello Reservoir

2 The aquatic region of the action area encompasses the regions of the Monticello Reservoir  
3 affected by cooling water withdrawals and discharges. This includes the area of hydraulic  
4 influence for the intake which could lead to impingement or entrainment (described in  
5 Section 3.7.3.1.2 of this SEIS). The area of the Monticello Reservoir that experiences increased  
6 temperatures from the discharge of heated effluent (Section 3.7.3.2 of this SEIS) includes the  
7 discharge bay, the discharge canal, and areas to the east of the discharge jetty.

8 The NRC staff recognizes that, although the described action area is stationary, federally listed  
9 species can move in and out of the action area. For instance, a migratory bird could occur in the  
10 action area seasonally as it forages or breeds within the action area. Thus, in its analysis, the  
11 NRC staff considers not only those species known to occur directly within the action area but  
12 those species that may passively or actively move into the action area. The NRC staff then  
13 considers whether the life history and habitat requirements of each species make it likely to  
14 occur in the action area where it could be affected by the proposed SLR. The following sections  
15 first discuss the listed species and critical habitats under FWS jurisdiction, followed by those  
16 under NMFS jurisdiction.

17 3.8.1.2 *Endangered Species Act: Federally Listed Species and Critical Habitats under*  
18 *U.S. Fish and Wildlife Service Jurisdiction*

19 This section evaluates two species; one species is proposed for listing under the ESA, and one  
20 species is a candidate for listing. No federally listed species or designated or proposed critical  
21 habitat occurs in the action area. Table 3-13 below identifies each of these species and its  
22 Federal status. The NRC staff determined these species to be relevant to this review based on  
23 desktop analysis of the V.C. Summer action area, available scientific literature and studies, the  
24 results of past ESA Section 7 consultations in connection with the V.C. Summer site, and an  
25 official species list generated from the FWS’s Information for Planning and Conservation (IPaC)  
26 (FWS 2024-TN10473).

27 **Table 3-13 Federally Listed Species Under U.S. Fish and Wildlife Jurisdiction, Evaluated**  
28 **for Virgil C. Summer Nuclear Station Subsequent License Renewal**

Common Name	Species	Federal Status <sup>(a)</sup>
tricolored bat	<i>Perimyotis subflavus</i>	FPE
monarch butterfly	<i>Danaus plexippus</i>	FC

(a) Indicates protection status under the Endangered Species Act. FC = candidate for Federal listing and FPE = proposed for Federal listing as endangered.

29 During the NRC staff’s environmental review for the initial V.C. Summer license renewal, the  
30 staff evaluated the effects of V.C. Summer operations on 10 species that were federally listed at  
31 that time and under FWS jurisdiction. These species were the Carolina heelsplitter  
32 (*Lasmigona decorata*), bald eagle, wood stork (*Myceteria americana*), red-cockaded  
33 woodpecker (*Picoides borealis*), pool sprite (*Amphianthus pusillus*), smooth coneflower  
34 (*Echinacea laevigata*), rough-leaved loosestrife (*Lysimachia asperulifolia*), Canby’s dropwort  
35 (*Oxypolis canbyi*), harperella (*Ptilimnium nodosum*), and relict trillium (*Trillium reliquum*). In  
36 addition, the NRC staff evaluated the effects of LR on the candidate species Georgia aster  
37 (*Aster georgianus*). In 2003, the NRC (2003-TN10474) prepared a biological assessment for  
38 these species and requested the FWS’s concurrence with its determination that V.C. Summer  
39 operations “may affect, but is not likely to adversely affect” the bald eagle. The FWS concurred

1 with the NRC's finding for the bald eagle (2003-TN10475). While the bald eagle continues to  
2 occur in the area, the FWS has delisted this species from Federal protection under the ESA.  
3 The bald eagle remains federally protected under the Bald and Golden Eagle Protection Act,  
4 which is discussed in Section 3.6.3.3 of this SEIS. For the remaining 11 species, the NRC staff  
5 concluded that license renewal would have *no effect*.

6 The NRC staff reviewed FWS species profiles for each of the above federally listed species  
7 (2024-TN10476, 2024-TN10477, 2024-TN10478, 2024-TN10479, 2024-TN10480, 2024-  
8 TN10481, 2024-TN10482, 2024-TN10483, 2024-TN10484, and 2024-TN10485), the FWS  
9 Information for Planning and Consultation report (FWS 2024-TN10473, other publicly available  
10 information, and the ER (Dominion 2023-TN10387). The NRC staff found no information  
11 indicating that any of the previously evaluated federally listed species are present within the  
12 action area, and the FWS included none of these species in the IPaC report for the proposed  
13 SLR. Therefore, the NRC staff does not evaluate these species any further in this SEIS.

14 After the initial LR, the FWS proposed to list tricolored bat (*Perimyotis subflavus*) as endangered  
15 and added monarch butterfly (*Danaus plexippus*) to its candidate list. Based on the above  
16 information, the NRC staff finds that these are the only species that warrant further  
17 consideration to determine if they may occur in the action area. These species are discussed in  
18 detail below.

#### 19 3.8.1.2.1 Tricolored Bat

20 The FWS issued a proposed rule to list the tricolored bat as endangered in 2022 (87 FR 56381-  
21 TN8546-TN8546). The FWS proposed no critical habitat with the rule because it found that such  
22 a designation could increase the degree of threat to the species. The information in this section  
23 is drawn from the FWS's species status assessment (2021-TN8589) unless otherwise cited.

24 The tricolored bat is a small insectivorous bat that can be distinguished by its unique tricolored  
25 fur, which often appears yellowish to orange. The species occurs across 39 States in the  
26 eastern and central United States, and in portions of southern Canada, Mexico, and Central  
27 America. During the winter, tricolored bats often inhabit caves and abandoned mines. In the  
28 southern United States, where caves are sparse, tricolored bats also roost in road culverts  
29 where they exhibit shorter hibernation bouts and may leave hibernacula to forage during warm  
30 nights. Tricolored bats hibernate singly, but sometimes in pairs or in small clusters of both sexes  
31 away from other bats. Between mid-August and mid-October, males and females converge at  
32 cave and mine entrances to swarm and mate, and females typically give birth to two young  
33 between May and July.

34 Tricolored bats disperse from winter hibernacula to a summer roosting habitat in the spring.  
35 Tracking studies have recorded migration paths that span from 27 mi (44 km) to 151 mi  
36 (243 km). During the spring, summer, and fall, tricolored bats occupy forested habitats.  
37 Individuals roost among leaves of live or recently dead deciduous hardwood trees, but  
38 individuals may also roost in pines (*Pinus* spp.), eastern red cedar (*Juniperus virginiana*),  
39 Spanish moss (*Tillandsia usneoides*), *Usnea trichodea* lichen, and occasionally human  
40 structures. Tricolored bats are opportunistic feeders and consume small insects including  
41 caddisflies (Trichoptera), flying moths (Lepidoptera), small beetles (Coleoptera), small wasps  
42 and flying ants (Hymenoptera), true bugs (Homoptera), and flies (Diptera).

1 Factors Affecting the Species

2 Tricolored bats face extinction primarily due to the range-wide impacts of white-nose syndrome,  
3 a deadly disease affecting cave-dwelling bats. The FWS estimates that white-nose syndrome  
4 has caused population declines of 90 percent or more in affected tricolored bat colonies across  
5 most of the species' range. Other drivers of its decline are wind-turbine mortality, habitat loss,  
6 and changing climate.

7 Occurrence within the Action Area

8 The FWS (2024-TN10473) identified the tricolored bat as potentially occurring in the action area  
9 in the IPaC report for the proposed action. Within South Carolina, the species is found  
10 throughout the State in the summer months. Dominion reports no occurrences of tricolored bats  
11 on the V.C. Summer site (2024-TN10391). However, Dominion has conducted no ecological  
12 surveys to specifically assess the species' presence or the suitability of onsite habitats.

13 Based on the above information, the NRC staff conservatively assumes that the deciduous  
14 forest habitat within the action area could support foraging, mating, and sheltering in the spring,  
15 summer, and fall. Accordingly, the staff assesses the potential impacts of the proposed action  
16 on this species in Section 3.8.5.1.1 of this SEIS.

17 *3.8.1.2.2 Monarch Butterfly*

18 The monarch butterfly is a candidate for Federal listing. In 2020, the FWS issued a 12-month  
19 finding announcing its intent to prepare a proposed rule to list the monarch butterfly as  
20 threatened (85 FR 81813-TN8590). In 2022, the FWS identified the monarch butterfly listing  
21 action as a priority because the magnitude of threats is moderate to low; however, these threats  
22 are imminent for the eastern and western North American populations. Although the ESA does  
23 not require consultation for candidates, the NRC staff considers this species here at the  
24 recommendation of the FWS (2024-TN10473) IPaC report for the proposed project. The  
25 information in this section is drawn from the FWS's candidate review unless otherwise cited (87  
26 FR 26152-TN8591).

27 The monarch is a large butterfly with bright orange wings and black veining and borders. During  
28 the breeding season, females lay eggs on milkweed (primarily *Asclepias* spp.). Developing  
29 larvae feed on milkweed, which allows them to sequester toxic chemicals as a defense against  
30 predators, before pupating into a chrysalis to transform into the adult butterfly form. Monarchs  
31 produce multiple generations each breeding season, and most adult butterflies live 2–5 weeks.  
32 Overwintering adults, however, enter reproductive diapause and live 6–9 months.

33 Monarch butterflies occur in 90 countries, islands, or island groups. Monarch butterflies have  
34 become naturalized at most of these locations outside North America since 1840. The  
35 populations outside eastern and western North America (including southern Florida) do not  
36 exhibit long-distance migratory behavior. In many regions, monarchs breed year-round. In  
37 temperate climates such as eastern and western North America, monarchs migrate long  
38 distances and live for an extended period. In both eastern and western North America, monarchs  
39 begin migrating in the fall to their respective overwintering sites in the forests of California and  
40 Mexico. These overwintering sites provide protection from the elements and moderate  
41 temperatures as well as nectar and clean water sources located nearby. Migration distances can  
42 be greater than 1,900 mi (3,000 km) and span a 2-month period. In early spring (i.e., February–  
43 March), surviving monarchs break diapause and mate at overwintering sites before dispersing.

1 The same individuals that undertook the initial southward migration begin flying back through the  
2 breeding grounds, and their offspring restart the cycle of generational migration.

3 Factors Affecting the Species

4 The primary threats to the monarch’s biological status include loss and degradation of habitat  
5 from conversion of grasslands to agriculture, widespread use of herbicides, logging or thinning  
6 at overwintering sites in Mexico, senescence and incompatible management of overwintering  
7 sites in California, urban development, drought, exposure to insecticides, and effects of climate  
8 change.

9 Occurrence within the Action Area

10 Monarchs are associated with prairie, meadow, and grassland habitats. Within South Carolina,  
11 21 native species of milkweed provide a habitat for the development of monarch eggs and  
12 larvae (iNaturalist 2024-TN10555). Along publicly accessible roads directly adjacent to the site,  
13 five milkweed species are known to occur: clasping milkweed (*Asclepias amplexicaulis*),  
14 butterfly milkweed (*A. tuberosa*), whorled milkweed (*A. verticellata*), redwing milkweed  
15 (*A. variegata*), and swamp milkweed (*A. viridiflora*).

16 Dominion reports no known occurrences of monarch butterfly on the V.C. Summer site (2024-  
17 TN10391). However, Dominion has conducted no ecological surveys to specifically assess the  
18 species’ presence or the suitability of onsite habitat. Given the proximity of known milkweed  
19 occurrences adjacent to the site, the NRC staff conservatively assumes that milkweeds could  
20 occur onsite and that the site may provide a larval habitat. If milkweeds are not present,  
21 monarchs could occur in the action area during spring and fall migration when individuals are  
22 moving between areas of more suitable habitat. Accordingly, the NRC staff assesses the  
23 potential impacts of the proposed action on this species in Section 3.8.5.1.2 of this SEIS.

24 *3.8.1.2.3 Summary of Potential Species Occurrences in the Action Area*

25 Table 3-14 below summarizes the potential for each species discussed in this section to occur  
26 in the action area. No federally listed species or proposed or designated critical habitat occur  
27 within the action area.

28 **Table 3-14 Summary of the Potential for Federally Listed Species Under the**  
29 **Jurisdiction of the U.S. Fish and Wildlife Service to Occur within the Action**  
30 **Area at Virgil C. Summer Nuclear Station**

Common Name	Type and Likelihood of Occurrence in the Action Area
tricolored bat	Presence possible in spring, summer, and fall in the deciduous forest habitat within the action area.
monarch butterfly	Larval habitat may be present if milkweeds are present. Otherwise, occasional transitory presence when moving between areas of more suitable habitat.

31 **3.8.2 Endangered Species Act: Federally Listed Species and Critical Habitats Under**  
32 **NMFS Jurisdiction**

33 During the NRC staff’s environmental review for the initial V.C. Summer license renewal, the  
34 staff evaluated the effects of V.C. Summer operations on one species that was federally listed  
35 and under NMFS jurisdiction: the shortnose sturgeon (*Acipenser brevirostrum*). The NRC staff

1 concluded that shortnose sturgeon were not present within the action area and so the SLR  
2 would have no effect on this species (2004-TN7262).

3 For the proposed action, the NRC staff reviewed its previous analysis and the NOAA Fisheries  
4 Southeast Region ESA Section 7 Mapper (2024-TN10486) and concluded that no federally  
5 listed species or designated critical habitats under NMFS jurisdiction occur in the action area.  
6 Therefore, this SEIS does not discuss any such species or habitats.

### 7 **3.8.3 Magnuson–Stevens Act: Essential Fish Habitat**

8 Congress enacted the MSA in 1976 to foster the long-term biological and economic  
9 sustainability of the Nation’s marine fisheries (TN9966). The MSA directs the Fishery  
10 Management Councils, in conjunction with NMFS, to designate areas of essential fish habitat  
11 (EFH) and to manage marine resources within those areas. EFH includes the coastal and  
12 marine waters and substrate necessary for fish to spawn, breed, feed, or grow to maturity  
13 (50 CFR Part 600-TN1342). For each federally managed species, the Fishery Management  
14 Councils and NMFS designate and describe the EFH by life stage (i.e., egg, larva, juvenile, and  
15 adult).

16 No coastal or marine waters occur near V.C. Summer. Therefore, this SEIS does not discuss  
17 EFH.

### 18 **3.8.4 National Marine Sanctuaries Act: Sanctuary Resources**

19 Congress enacted the NMSA in 1972 to protect areas of the marine environment that have  
20 special national significance. The NMSA authorizes the Secretary of Commerce to establish the  
21 National Marine Sanctuary System and designate sanctuaries within that system, which  
22 includes 15 sanctuaries and 2 marine national monuments, encompassing more than  
23 600,000 mi<sup>2</sup> (1,553,993 km<sup>2</sup>) of marine and Great Lakes waters from Washington State to the  
24 Florida Keys and from Lake Huron to American Samoa. Within these areas, sanctuary  
25 resources include any living or nonliving resource of a national marine sanctuary that  
26 contributes to the conservation, recreational, ecological, historical, educational, cultural,  
27 archaeological, scientific, or aesthetic value of the sanctuary.

28 No coastal or marine waters or Great Lakes occur near V.C. Summer. Therefore, this SEIS  
29 does not discuss national marine sanctuaries or their resources.

### 30 **3.8.5 Proposed Action**

31 As documented in the 2024 LR GEIS (NRC 2024-TN10161) and shown in Table 3-2, the NRC  
32 staff identified four plant-specific Category 2 issues related to federally protected ecological  
33 resources applicable to V.C. Summer during the SLR term. These Category 2 issues are  
34 analyzed below.

#### 35 *3.8.5.1 Endangered Species Act: Federally Listed Species and Critical Habitats Under* 36 *U.S. Fish and Wildlife Service Jurisdiction*

37 In Section 3.8.1.2 of this SEIS, the NRC staff determined that no federally listed species occur  
38 in the action area. The tricolored bat, which the FWS has proposed for Federal listing as  
39 endangered, and the monarch butterfly, which is a candidate for Federal listing, may occur in  
40 the action area. Section 3.8.2 of this SEIS includes relevant information about the habitat

1 requirements, life history, and regional occurrence of these species. In the sections below, the  
 2 NRC staff analyzes the potential impacts of the proposed V.C. Summer SLR on these species.  
 3 Table 3-15 summarizes the NRC staff's ESA effect determinations that resulted from the staff's  
 4 analysis.

5 **Table 3-15 Effect Determinations for Federally Listed Species under U.S. Fish and**  
 6 **Wildlife Service Jurisdiction at the Virgil C. Summer Nuclear Station Site**

Species	Federal Status <sup>(a)</sup>	Potentially Present in the Action Area?	Effect Determination <sup>(b)</sup>
tricolored bat	FPE	Yes	NLAA
monarch butterfly	FC	Yes	NLAA

(a) Indicates protection status under the Endangered Species Act. FC = candidate for Federal listing and FPE = proposed for Federal listing as endangered.  
 (b) The NRC staff makes its effect determinations for federally listed species in accordance with the language and definitions specified in the FWS and NMFS Endangered Species Consultation Handbook (FWS and NMFS 1998-TN1031). NLAA = not likely to adversely affect.

7 **3.8.5.1.1 Tricolored Bat**

8 In Section 3.8.2 of this SEIS, the NRC staff concludes that the tricolored bat may occur in the  
 9 action area's forests in spring, summer, and fall. If present, these bats would occur rarely and in  
 10 low numbers.

11 The potential stressors that tricolored bats could experience from the operation of a nuclear  
 12 power plant (generically) are as follows:

- 13 • mortality or injury from collisions with nuclear power plant structures and vehicles
- 14 • habitat loss, degradation, disturbance, or fragmentation, and associated effects
- 15 • behavioral changes resulting from refurbishment or other site activities

16 This section addresses each of these stressors below.

17 Mortality or Injury from Collisions with Nuclear Power Plant Structures and Vehicles

18 Several studies have documented bat mortality or injury resulting from collisions with  
 19 human-made structures. Saunders (1930-TN8504) reported that five bats of three species—  
 20 eastern red bat, hoary bat (*L. cinereus*), and silver-haired bat—were killed when they collided  
 21 with a lighthouse in Ontario, Canada. In Kansas, Van Gelder (1956-TN8505) documented five  
 22 eastern red bats that collided with a television tower. In Florida, Crawford and Baker (1981-  
 23 TN8506) collected 54 bats of seven species that collided with a television tower over a 25 year  
 24 period, Zinn and Baker (1979-TN8507) reported 12 dead hoary bats at another television tower  
 25 over an 18-year period, and Taylor and Anderson (1973-TN8508) reported 1 dead yellow bat  
 26 (*Lasiurus intermedius*) at a third Florida television tower. Bat collisions with communications  
 27 towers have been reported in North Dakota, Tennessee, and Saskatchewan, Canada; with  
 28 convention center windows in Chicago, Illinois; and with power lines, barbed wire fences, and  
 29 vehicles in numerous locations (Johnson and Strickland 2003-TN8509).

30 More recently, bat collisions with wind turbines have been of concern in North America. Bat  
 31 fatalities have been documented at most wind facilities throughout the United States and  
 32 Canada (USGS 2016-TN8510). For instance, during a 1996–1999 study at the Buffalo Ridge  
 33 wind power development project in Minnesota, Johnson et al. (2003-TN8511) reported 183 bat  
 34 fatalities, most of which were hoary bats and eastern red bats. The USGS Fort Collins Science

1 Center estimates that tens to hundreds of thousands of bats die at wind turbines in North  
2 America each year (USGS 2016-TN8510).

3 Bat collisions with human-made structures at nuclear power plants are not well documented but  
4 are likely rare based on available information. In an assessment of the potential effects of the  
5 operation of the Davis-Besse Nuclear Power Station in Ohio, the NRC staff (NRC 2014-  
6 TN7385) noted that four dead bats were collected at the nuclear power plant during bird  
7 mortality studies conducted from 1972 through 1979. Two red bats (*Lasiurus borealis*) were  
8 collected at the cooling tower, and one big brown bat and one tricolored bat were collected near  
9 other nuclear power plant structures. The NRC staff (NRC 2014-TN7385) found that future  
10 collisions of bats would be extremely unlikely and, therefore, discountable, given the small  
11 number of bats collected during the study and the marginal suitable habitat that the nuclear  
12 power plant site provides. The FWS (2014-TN7605) concurred with this determination. In a  
13 2015 assessment associated with Indian Point Nuclear Generating Units 2 and 3 in New York,  
14 the NRC staff (2015-TN7382) determined that bat collisions were less likely to occur at Indian  
15 Point than at Davis-Besse because Indian Point does not have cooling towers or similarly large  
16 obstructions. The tallest structures on the Indian Point site are 134 ft (40.8 m) tall turbine  
17 buildings and 250 ft (76.2 m) tall reactor containment structures. The NRC staff (2015-TN7382)  
18 concluded that the likelihood of bats colliding with these and other nuclear power plant  
19 structures on the Indian Point site during the license renewal period was extremely unlikely to  
20 occur and, therefore, discountable. FWS concurred with this determination (2015-TN7612). In  
21 2018, the NRC staff (2018-TN7381) determined that the likelihood of bats colliding with site  
22 buildings or structures on the Seabrook Station, Unit 1, site in New Hampshire would be  
23 extremely unlikely. The tallest structures on that site are the 199 ft (61 m) tall containment  
24 structure and the 103 ft (31 m) tall turbine and heater bay building. The FWS (2018-TN7610)  
25 concurred with the NRC staff's determination. Since that time, the FWS has concurred with  
26 similar findings for initial LRAs and SLRAs at multiple other nuclear power plant sites, including  
27 Surry Power Station, Units 1 and 2, in Surry, Virginia (2019-TN7609); Peach Bottom Atomic  
28 Power Station, Units 2 and 3, in Delta, Pennsylvania (2019-TN9742); Point Beach Nuclear  
29 Plant, Units 1 and 2, in Two Rivers, Wisconsin (2021-TN9740); North Anna Power Station, Units  
30 1 and 2, in Louisa, Virginia (2023-TN9093); and Perry Nuclear Power Plant, Unit 1, in Perry,  
31 Ohio (2023-TN9741), among others.

32 The tallest structures on the V.C. Summer site are the reactor building and the primary MET,  
33 which are both 203.4 ft (62 m) above ground level (Dominion 2023-TN10387). The turbine  
34 buildings and transmission lines are also prominent features on the site. To date, Dominion has  
35 reported no incidents of injury or mortality of any species of bat on the V.C. Summer site  
36 associated with site buildings or structures. Accordingly, the NRC staff finds the likelihood of  
37 future tricolored bat collisions with site buildings or structures to be extremely unlikely and,  
38 therefore, discountable.

39 Vehicle collision risk for bats varies depending on factors including time of year, location of roads  
40 and travel pathways in relation to roosting and foraging areas, the characteristics of individuals'  
41 flight, traffic volume, and whether young bats are dispersing. Although collision has been  
42 documented for several species of bats, the Indiana Bat Draft Recovery Plan (FWS 2007-TN934)  
43 indicates that bat species do not seem to be particularly susceptible to vehicle collisions.  
44 However, the FWS also finds it difficult to determine whether roads pose a greater risk for bats  
45 colliding with vehicles or a greater likelihood of decreasing risk of collision by deterring bat  
46 activity (2016-TN7400). In most cases, the FWS expects that roads of increasing size decrease  
47 the likelihood of bats crossing the roads and, therefore, reduce collision risk (2016-TN7400).



1 During the proposed V.C. Summer SLR term, vehicular traffic from truck deliveries, site  
2 maintenance activities, as well as personnel commuting to and from the site would continue  
3 throughout the SLR period as they have during the current licensing period. Vehicle use would  
4 occur primarily in areas that bats would be less likely to frequent, such as along established  
5 county and State roads or within industrial-use areas of the V.C. Summer site. Additionally,  
6 most vehicle activity would occur during daylight hours when bats are less active. To date,  
7 Dominion has reported no incidents of injury or mortality of any species of bat on the  
8 V.C. Summer site associated with vehicle collisions. Accordingly, the NRC staff finds the  
9 likelihood of future tricolored bat collisions with vehicles to be extremely unlikely and, therefore,  
10 is not considered further.

#### 11 Habitat Loss, Degradation, Disturbance, or Fragmentation, and Associated Effects

12 As previously discussed in this SEIS, the V.C. Summer action area includes a forested habitat  
13 that protected bats may rarely (to occasionally) inhabit in spring, summer, and fall. In its species  
14 status assessment for the tricolored bat (2021-TN8589), the FWS stated that forest removal  
15 may result in the following impacts to tricolored bats: loss of suitable roosting or foraging habitat,  
16 longer flights between suitable roosting and foraging habitats because of forest habitat  
17 fragmentation, fragmentation of maternity colonies due to loss/fragmentation of travel corridors,  
18 and direct mortality or injury during tree removal.

19 The proposed action would not involve forest removal or management and would generally not  
20 disturb the existing forested habitat on the site. Dominion states that it is not actively managing  
21 the forest within site boundaries but may selectively thin recently planted trees as necessary to  
22 maintain a healthy forest (2024-TN10391). Other vegetation maintenance on the site over the  
23 course of the proposed SLR term would be of grassy, mowed areas between buildings and  
24 along walkways within the industrial portion of the site (Dominion 2023-TN10387). Dominion  
25 would continue to maintain onsite transmission line ROWs in accordance with North American  
26 Electric Reliability Corporation standards. Less-developed areas and forested areas would be  
27 largely unaffected. Dominion does not intend to expand the existing facilities or otherwise  
28 perform construction or maintenance activities within these areas. Site personnel may  
29 occasionally remove select trees around the margins of existing forested areas if those trees are  
30 deemed hazardous to buildings, infrastructure, or other site facilities or to existing overhead  
31 clearances. Negative impacts on bats could result if such trees are potential roost trees. Bats  
32 could also be directly injured during tree clearing. However, tree removal would be infrequent,  
33 and Dominion personnel would follow company guidance to minimize potential impacts on bats.

34 The NRC staff finds that infrequent to rare hazardous tree removal in forested areas during the  
35 proposed SLR term would not measurably affect any potential bat habitat in the action area.  
36 Direct injury or mortality to bats during tree removal is also unlikely because Dominion company  
37 guidance would ensure that personnel take the appropriate measures to avoid this potential  
38 impact (2024-TN10391). For instance, Dominion could avoid this impact by removing hazardous  
39 trees in the winter when bats are unlikely to be present on the site. Additionally, the continued  
40 preservation of the existing forested areas on the site during the SLR term would result in  
41 positive impacts on tricolored bats if they are present within or near the action area.

#### 42 Behavioral Changes Resulting from Refurbishment or Other Site Activities

43 Construction or refurbishment and other site activities, including site maintenance and  
44 infrastructure repairs, could prompt behavioral changes in bats. Noise, vibration, and general  
45 human disturbance are stressors that may disrupt normal feeding, sheltering, and breeding

1 activities (FWS 2016-TN7400). At low noise levels or farther distances, bats initially may be  
2 startled but would likely habituate to the low background noise levels. At closer range and  
3 louder noise levels, particularly if accompanied by physical vibrations from heavy machinery,  
4 many bats would likely be startled to the point of fleeing from their daytime roosts. Fleeing  
5 individuals could experience increased susceptibility to predation and would expend increased  
6 levels of energy, which could result in decreased reproductive fitness (FWS 2016-TN7400:  
7 Table 4-1). Increased noise may also affect foraging success. Schaub et al. (2008-TN8867)  
8 found that the foraging success of the greater mouse-eared bat (*Myotis myotis*) diminished in  
9 areas with noise mimicking the traffic sounds that would be experienced within 15 m (49 ft) of a  
10 highway.

11 Within the V.C. Summer action area, noise, vibration, and other human disturbances could  
12 dissuade bats from using the action area's forested habitat during migration, which could also  
13 reduce the fitness of migrating bats. However, bats that use the action area have likely become  
14 habituated to such disturbances because V.C. Summer has been consistently operating for  
15 several decades. According to the FWS, bats that are repeatedly exposed to predictable, loud  
16 noises may habituate to such stimuli over time (2010-TN8537). For instance, Indiana bats have  
17 been documented as roosting within approximately 1,000 ft (300 m) of a busy State route  
18 adjacent to Fort Drum Military Installation and immediately adjacent to housing areas and  
19 construction activities on the installation (U.S. Army 2014-TN8512). Tricolored bats would likely  
20 respond similarly.

21 Continued operation of V.C. Summer during the SLR term would not include major construction  
22 or refurbishment and would involve no other maintenance or infrastructure repair activities  
23 besides routine activities already performed on the site. Levels and intensity of noise, lighting,  
24 and human activity associated with continued day-to-day activities and site maintenance during  
25 the SLR term would be similar to ongoing conditions since V.C. Summer began operating, and  
26 such activity would only occur on the developed, industrial-use portions of the site. While these  
27 disturbances could cause behavioral changes in migrating or summer roosting bats, such as the  
28 expenditure of additional energy to find alternative suitable roosts, the NRC staff assumes that  
29 tricolored bats, if present in the action area, have already acclimated to regular site  
30 disturbances. Thus, continued disturbances during the SLR term would not cause behavioral  
31 changes in bats to a degree that would be able to be meaningfully measured, detected, or  
32 evaluated or that would reach the scale where a take might occur.

### 33 Summary of Effects

34 The potential stressors evaluated in this section are unlikely to result in effects on the tricolored  
35 bats that could be meaningfully measured, detected, or evaluated, and such stressors are  
36 otherwise unlikely to occur for the following reasons:

- 37 • Bat collisions with nuclear power plant structures in the United States are rare, and none  
38 have been reported at V.C. Summer.
- 39 • Vehicle collisions attributable to the proposed action are also unlikely, and none have been  
40 reported at V.C. Summer.
- 41 • The proposed action would not involve any construction, land clearing, or other ground-  
42 disturbing activities.
- 43 • Continued preservation of the existing forested areas on the site would result in positive  
44 impacts on bats.

- 1 • Bats, if present in the action area, have likely already acclimated to the noise, vibration, and  
2 general human disturbances associated with site maintenance, infrastructure repairs, and  
3 other site activities. During the SLR term, such disturbances and activities would continue at  
4 current rates and would be limited to the industrial-use portions of the site.

#### 5 Conclusion for the Tricolored Bat

6 All potential effects on the tricolored bat resulting from the proposed action would be  
7 insignificant or discountable. Therefore, the NRC staff concludes that the proposed action *may*  
8 *affect but is not likely to adversely affect* the tricolored bat.

9 The ESA regulations in 50 CFR 402.10(a) (TN4312) require Federal agencies to confer with the  
10 Services any agency action that is likely to jeopardize the continued existence of any proposed  
11 species or result in the destruction or adverse modification of proposed critical habitat.  
12 Therefore, based on its “not likely to adversely affect” determination, the NRC is not required to  
13 confer with the FWS on the tricolored bat.

#### 14 *3.8.5.1.2 Monarch Butterfly*

15 In Section 3.8.1.2.2 of this SEIS, the NRC staff concludes that monarch butterflies may occur in  
16 the action area when these butterflies move between areas with more suitable habitat. If  
17 present, monarchs would occur occasionally and for short periods of time.

18 The FWS (2020-TN8593) identifies the primary drivers affecting the health of the two North  
19 American migratory populations of monarch butterfly as: (1) habitat loss and degradation,  
20 (2) insecticide exposure, and (3) climate change effects.

21 Monarch habitat loss and degradation has resulted from the conversion of grasslands to  
22 agriculture, widespread use of herbicides, logging/thinning at overwintering sites in Mexico,  
23 senescence and incompatible management of overwintering sites in California, urban  
24 development, and drought (FWS 2020-TN8593). The proposed V.C. Summer SLR would not  
25 involve any habitat loss, land-disturbing activities, or any activities that would degrade existing  
26 natural areas or potential habitats for monarch butterflies. The continued preservation of existing  
27 natural areas on the site would result in positive impacts on monarch butterflies.

28 Most insecticides are nonspecific and broad-spectrum in nature. Furthermore, the larvae of  
29 many Lepidopterans are considered major pest species, and insecticides are specifically tested  
30 on this taxon to ensure that they will effectively kill individuals at the labeled application rates  
31 (FWS 2020-TN8593). Although insecticide use is most often associated with agricultural  
32 production, any habitat where monarchs are found may be subject to insecticide use. Studies  
33 looking specifically at the dose response of monarchs to neonicotinoids, organophosphates, and  
34 pyrethroids have demonstrated monarch toxicity (e.g., Krischik et al. 2015-TN8596;  
35 James 2019-TN8595; Krishnan et al. 2020-TN8597; Bagar et al. 2020-TN8594). Larvae and  
36 pupae experience reduced survival rates, while adult monarchs are less affected. Moreover, the  
37 magnitude of risk posed by insecticides may be underestimated, as research usually examines  
38 the effects of the active ingredient alone, while many of the formulated products contain more  
39 than one active insecticide.

40 During the proposed SLR period, Dominion would continue applying herbicides as needed,  
41 according to labeled uses, but has no plans to apply herbicides in natural areas. Application  
42 would primarily be confined to industrial-use and other developed portions of the site, such as

1 perimeters of parking lots, roads, and walkways. Continued herbicide application could directly  
2 affect monarchs in the action area by injuring or killing individuals exposed to these chemicals.  
3 Certain herbicides such as glyphosate (e.g., Round Up) can kill milkweed, which can affect the  
4 ability of female monarchs to lay eggs. Although milkweed is not specifically known to occur on  
5 the V.C. Summer site, it has the potential to occur on site in the grasslands and open areas,  
6 given its occurrence in the V.C. Summer vicinity. Monarchs are only likely to occur in the action  
7 area seasonally during spring and fall migration when individuals are moving between areas of  
8 more suitable habitat. Because of the low likelihood of monarchs to be exposed to hazardous  
9 levels of chemicals, this potential impact is insignificant because it is unlikely to reach the scale  
10 where a take might occur.

11 Because the current and projected monarch population numbers are low, both the eastern and  
12 western populations are more vulnerable to catastrophic events, such as extreme storms at the  
13 overwintering habitat, and other climate change related phenomena. The FWS (2020-TN8593)  
14 anticipates that the eastern population will gain habitat in the northcentral region of North  
15 America as the species expands northward in response to increasing ambient temperatures.  
16 The degree and rate at which this expansion occurs will depend on the simultaneous northward  
17 expansion of milkweed. In the southern region of the continent, the population will either  
18 experience no gain or some loss of habitat.

19 Impacts on climate change during normal operations at nuclear power plants can result from the  
20 release of GHGs from stationary combustion sources, refrigeration systems, electrical  
21 transmission and distribution systems, and mobile sources. However, such emissions are  
22 typically very minor because nuclear power plants do not normally combust fossil fuels to  
23 generate electricity. During the proposed SLR term, the contribution of V.C. Summer operations  
24 to climate-change-related effects on monarch butterflies would be too small to be meaningfully  
25 measured, detected, or evaluated.

## 26 Summary of Effects

27 The potential stressors evaluated in this section are unlikely to result in effects on monarch  
28 butterflies that could be meaningfully measured, detected, or evaluated, and such stressors are  
29 otherwise unlikely to occur for the following reasons:

- 30 • The proposed action would not involve any habitat loss, land-disturbing activities, or any  
31 activities that would degrade existing natural areas or potential habitat for monarchs.
- 32 • Continued preservation of the existing natural areas on the site would result in positive  
33 impacts on monarchs.
- 34 • Herbicides would only be applied according to labeled uses in developed and manicured  
35 areas of the site. Herbicides would not be applied in natural areas. Monarchs would only  
36 have the potential to occur in the action area seasonally and infrequently, making the  
37 likelihood of herbicide exposure low. This represents an insignificant effect because it is  
38 unlikely to reach the scale where a take might occur.
- 39 • The contribution of V.C. Summer operations to climate-change-related effects on monarchs  
40 would be too small to be meaningfully measured, detected, or evaluated.

## 41 Conclusion for the Monarch Butterfly

42 All potential effects on the monarch butterfly resulting from the proposed action would be  
43 insignificant or discountable. Therefore, the NRC staff concludes that the proposed action *may*

1 *affect but is not likely to adversely affect* the monarch butterfly. Because the monarch is a  
2 candidate for Federal listing, the ESA does not require the NRC to consult with or receive  
3 concurrence from the FWS regarding this species.

4 **3.8.5.2** *Endangered Species Act: Federally Listed Species and Critical Habitats under NMFS*  
5 *Jurisdiction*

6 No federally listed species or critical habitats under NMFS jurisdiction occur within the action  
7 area (see Section 3.8.2 of this SEIS). Therefore, the NRC staff concludes that the proposed  
8 action would have no effect on federally listed species or habitats under this agency's  
9 jurisdiction.

10 **3.8.5.3** *Magnuson–Stevens Act: Essential Fish Habitat*

11 No EFH occurs within the affected area (see Section 3.8.3 of this SEIS). Therefore, the NRC  
12 staff concludes that the proposed action would have no effect on EFH.

13 **3.8.5.4** *National Marine Sanctuaries Act: Sanctuary Resources*

14 No national marine sanctuaries occur within the affected area (see Section 3.8.3 of this SEIS).  
15 Therefore, the NRC staff concludes that the proposed action would have no effect on sanctuary  
16 resources.

17 **3.8.6 No-Action Alternative**

18 Under the no-action alternative, the NRC would not issue a subsequent renewed license, and  
19 V.C. Summer would shut down on or before the expiration of the current renewed facility  
20 operating license. Upon shutdown, the nuclear power plant would require substantially less  
21 cooling water and would produce little to no discernable thermal effluent. Thus, the potential for  
22 impacts on all aquatic species related to cooling system operation would be significantly  
23 reduced. The ESA action area under the no-action alternative would most likely be the same or  
24 similar to the area described in Section 3.8.1.1 of this SEIS, and so tricolored bats and monarch  
25 butterflies would likely occur within this action area (see Section 3.8.2 of this SEIS). The NRC  
26 would consult with the FWS, as appropriate, to address potential effects to these species  
27 resulting from the shutdown and decommissioning of the plant. No EFH or national marine  
28 sanctuaries occur in the region (see Sections 3.8.3 and 3.8.4 of this SEIS). Thus, shutdown  
29 would not result in impacts on EFH or sanctuary resources. Actual impacts would depend on the  
30 specific shutdown activities and whether any listed species or critical habitats are present when  
31 the no-action alternative is implemented.

32 **3.8.7 Replacement Power Alternatives: Common Impacts**

33 This section describes the common impacts for all four replacement power alternatives  
34 described in Section 2.3.2 of this SEIS. The ESA action area for any of the replacement  
35 alternatives would depend on various factors including site selection, current land uses, planned  
36 construction activities, temporary and permanent structure locations and parameters, and the  
37 timeline of the alternative. The ESA action area would occur within Dominion's region of  
38 influence (ROI).

39 The listed species, critical habitats, EFH, and national marine sanctuaries potentially affected by  
40 a replacement power alternative would depend on the boundaries of that alternative's effects and  
41 the species and habitats federally protected at the time that the alternative is implemented. For

1 instance, if V.C. Summer continues to operate until the end of the current license term and a  
2 replacement power alternative is implemented at that time, the FWS and NMFS may have listed  
3 new species, delisted currently listed species whose populations have recovered, or revised EFH  
4 designations. These listing and designation activities would change the potential for the various  
5 alternatives to impact federally protected ecological resources. Additionally, requirements for  
6 consultation under ESA, MSA, and NMSA would depend on whether Federal permits or  
7 authorizations are required to implement each alternative. Federal permitting agencies would be  
8 required to consult with the FWS, NMFS, and/or NOAA under these statutes if a replacement  
9 power alternative could adversely affect federally protected ecological resources.

10 Sections 3.6 and 3.7 of this SEIS describe the types of impacts that terrestrial and aquatic  
11 resources would experience under each alternative. Impacts on federally protected ecological  
12 resources would likely be similar in type. However, the magnitude and significance of such  
13 impacts could be greater for federally protected ecological resources because such species and  
14 habitats are rare and more sensitive to environmental stressors.

### 15 **3.8.8 Natural Gas Alternative**

16 The NRC does not license natural gas or renewable energy facilities; therefore, the NRC would  
17 not be responsible for ESA, MSA, or NMSA consultations for this alternative. The Federal and  
18 private responsibilities for addressing impacts on federally protected ecological resources under  
19 this alternative would be like those described in Section 3.8.7 of this SEIS. Ultimately, the  
20 magnitude and significance of adverse impacts on federally protected ecological resources  
21 resulting from the natural gas alternative would depend on the site location and layout, plant  
22 design, plant operations, and the protected species and habitats present in the area when the  
23 alternative is implemented.

### 24 **3.8.9 New Nuclear (Small Modular Reactor) Alternative**

25 The impacts of the new nuclear alternative are largely addressed in the impacts common to all  
26 replacement power alternatives described in the previous section. Because the NRC would  
27 remain the licensing agency under this alternative, the ESA and MSA would require the NRC to  
28 consult with the FWS and NMFS, as applicable, before issuing a license for the construction  
29 and operation of the new facility. During these consultations, the NRC would determine whether  
30 the new reactors would affect any federally listed species, adversely modify or destroy  
31 designated critical habitat, or result in adverse effects on EFH. If the new facility requires a CWA  
32 Section 404 permit, the USACE may be a cooperating agency for required consultations, or the  
33 USACE may be required to consult separately. Ultimately, the magnitude and significance of  
34 adverse impacts on special status species and habitats would depend on the site location and  
35 layout, nuclear power plant design, nuclear power plant operations, and the special status  
36 species and habitats present in the area when the alternative is implemented.

### 37 **3.8.10 Natural Gas and Solar Combination Alternative**

38 The NRC does not license renewable energy facilities; therefore, the NRC would not be  
39 responsible for ESA, MSA, or NMSA consultations for this alternative. The Federal and private  
40 responsibilities for addressing the impacts on federally protected ecological resources under this  
41 alternative would be like those described in Section 3.8.7 of this SEIS. Ultimately, the magnitude  
42 and significance of adverse impacts on federally protected ecological resources resulting from  
43 the natural gas alternative would depend on the site location and layout, plant design, plant  
44 operations, and the protected species and habitats present in the area when the alternative is  
45 implemented.

1 **3.8.11 New Nuclear and Solar Combination Alternative**

2 The impacts of this alternative for the nuclear component of this alternative are the same as  
3 Section 3.8.9 of this SEIS. Because the NRC would remain the licensing agency for the nuclear  
4 component of this alternative, the ESA and MSA would require the NRC to consult with the  
5 FWS and NMFS, as applicable, before issuing a license for the construction and operation of  
6 the new SMR facility. If the new nuclear facility requires a CWA Section 404 permit, the USACE  
7 may be a cooperating agency for required consultations, or the USACE may be required to  
8 consult separately. The NRC does not license solar facilities or play a role in energy-planning  
9 decisions; therefore, the NRC would not be responsible for ESA or EFH consultation for the  
10 solar component of this alternative.

11 Ultimately, the magnitude and significance of adverse impacts on special status species and  
12 habitats would depend on the site location and layout, plant design, operations, and the special  
13 status species and habitats present in the area when the alternative is implemented.

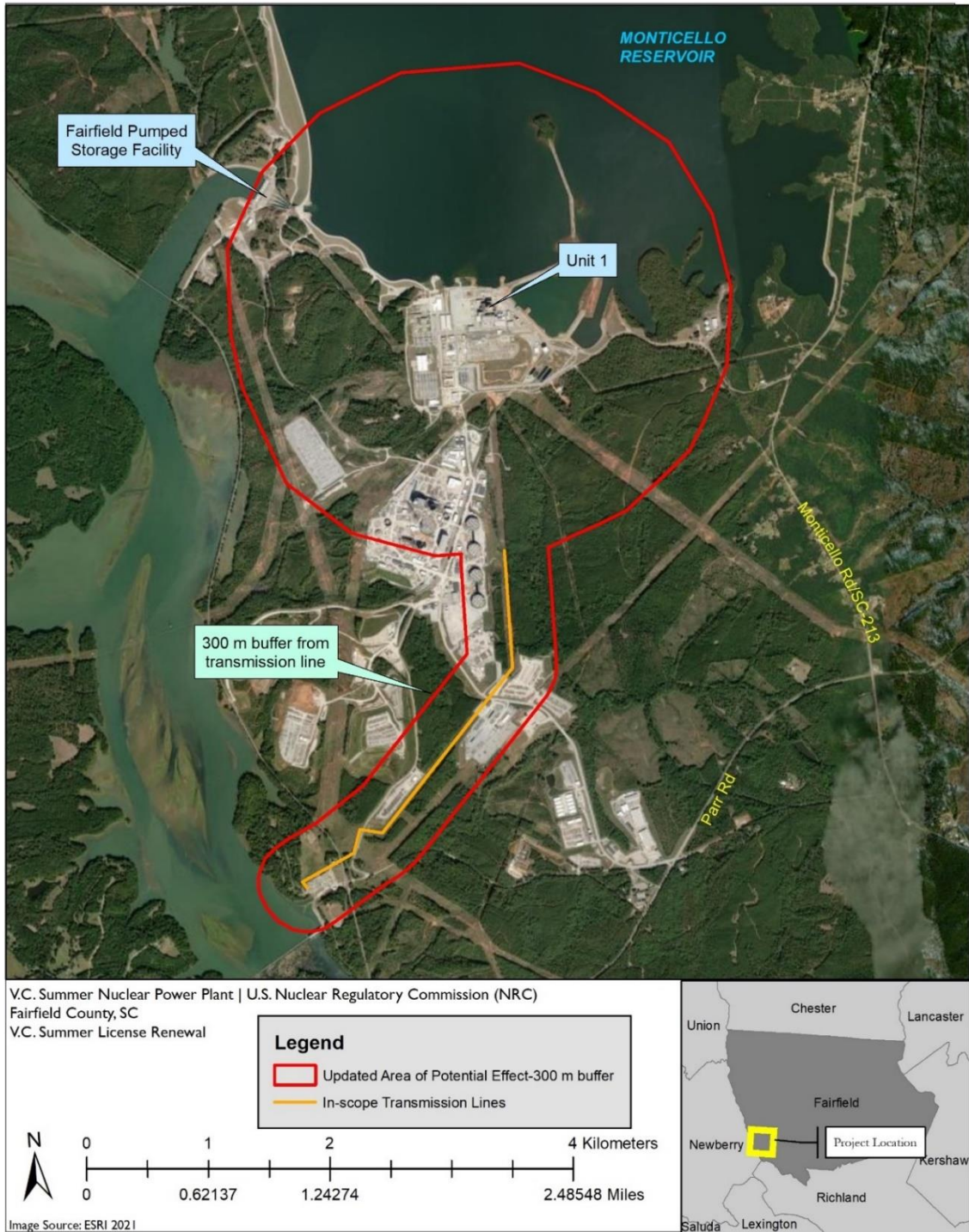
14 **3.9 Historic and Cultural Resources**

15 This section of the SEIS describes the cultural background and the historic and cultural  
16 resources at V.C. Summer and its surrounding area. Historic and cultural resources describe  
17 material culture left behind from past human activity. Cultural resources include sites, objects,  
18 landscapes, structures, or other natural features of significance to groups of people who have  
19 traditional association with it. Section 106 of the NHPA (54 U.S.C. § 306108-TN4839) requires  
20 Federal agencies to take into account the effects of their undertakings on historic properties.  
21 Renewing the operating license of a nuclear power plant is an undertaking that could potentially  
22 affect historic properties. Historic properties are defined as resources eligible for listing in the  
23 National Register of Historic Places (NRHP). The NRHP is the Nation's official list recognizing  
24 buildings, structures, objects, sites, and districts of national, State, or local historical significance  
25 which merit preservation. The criteria for eligibility are listed in 36 CFR 60.4 "Criteria for  
26 Evaluation," (TN1682) and include (A) association with significant events in history; (B)  
27 association with the lives of persons significant in the past; (C) embodiment of distinctive  
28 characteristics of type, period, or construction; and (D) resources that have yielded, or are likely  
29 to yield, important information. In accordance with 36 CFR 800.8(c) (TN513), the NRC complies  
30 with the obligations required under NHPA Section 106 through its process under NEPA (42  
31 U.S.C. 4321 et seq.-TN661) and has done so for this proposed action.

32 The proposed action is the SLR of the current renewed operating license, which would extend  
33 the current operating term for an additional 20 years. The Area of Potential Effect (APE)  
34 consists of the approximately 2,200 ac (890 ha) of the V.C. Summer site, a 2.6 mi (4 km)  
35 transmission line, and a 300 m (984 ft) buffer around the transmission line, to encompass the  
36 area where activities associated with the operation of the facility could potentially compromise  
37 the integrity of historic properties (Figure 3-11 below). The APE may extend beyond the nuclear  
38 plant site when these activities may indirectly (e.g., visual and auditory) affect historic  
39 properties. This determination is made irrespective of land ownership or control.

40 In accordance with NHPA's implementing regulations in 36 CFR Part 800 (TN513), the NRC is  
41 required to make a reasonable effort to identify historic properties within the APE. If the NRC  
42 finds that either there are no historic properties within the APE or the undertaking (SLR) would  
43 have no effect on historic properties, the NRC provides documentation of this finding to the  
44 State Historic Preservation Officer (SHPO). In addition, the NRC notifies all consulting parties,  
45 including Indian Tribes, and makes this finding public through the NEPA process prior to issuing

1 the subsequent renewed operating license. Similarly, if historic properties are present and could  
 2 be affected by the undertaking, the NRC is required to assess and resolve any adverse effects  
 3 in consultation with the SHPO and any Indian Tribe that attaches religious and cultural  
 4 significance to identified historic properties.



5  
 6 **Figure 3-11 Map of the Area of Potential Effect for Virgil C. Summer Nuclear Station**



1 In South Carolina, the South Carolina Department of Archives and History (SCDAH) is  
2 responsible for administering Federal and State-mandated historic preservation programs to  
3 identify, evaluate, register, and protect the State’s archaeological and historic resources under  
4 the direction of the South Carolina SHPO. The SCDAH maintains the ArchSite electronic  
5 database, which inventories all registered cultural resources within the state, including those  
6 within the V.C. Summer plant.

### 7 **3.9.1 Cultural Background**

8 This section of the SEIS documents the precontact, ethnographic, and historic chronology of the  
9 proposed action’s region. Cultural sequences are based on those described in Anderson and  
10 Sassaman (2012-TN10494). The chronology of the area is divided into the following periods:  
11 Paleoindian (13000 to 10000 before present [BP]), Archaic (10000 to 3000 BP), Woodland  
12 (3000 BP to Anno Domini [AD] 1100), Mississippian (AD 1100–1540), and Contact/Historic  
13 Period (1540 to present). The context described below helps archaeologists understand what  
14 previous research has been done in the area to inform cultural resources professionals what  
15 potential natural and cultural resources may be encountered in the project area. General  
16 patterns summarizing each time period are briefly described below.

#### 17 *3.9.1.1 Paleoindian Period (13000–10000 BP)*

18 The Paleoindian Period is considered to represent the earliest documented human occupation  
19 in the region, extending more than 13,000 years ago to the terminal Pleistocene period. This  
20 period is typically characterized by small groups of highly mobile nomadic hunters who followed  
21 large game such as mammoths, mastodons, and bison and inhabited small semi-permanent  
22 camps. There has been ongoing dialogue in the archaeological community on what is  
23 considered the earliest documented human occupation in North America. Scholars typically  
24 associate the Clovis culture with the Paleoindian Period, although there are a number of  
25 well-known archaeological sites across North America that predate Clovis period sites. These  
26 include the Meadowcroft Rockshelter in Pennsylvania (Adovasio et al. 1990-TN10487), Paisley  
27 Caves in Oregon (Gilbert et al. 2008-TN10488), and White Sands in New Mexico (Pigati et al.  
28 2023-TN10489).

29 Stone tool technologies of this era are mostly associated with the Clovis and Folsom  
30 (10,800 Before Christ [BC]–9500 BC) cultures. Both are known for their fluted points and large  
31 spear points made from high quality chert characterized by a groove notched out in the middle  
32 to bottom half of the point, allowing it to be attached to handles. Aside from fluted points, the  
33 Paleoindian toolkit also includes unfluted lanceolate projectile points, side scrapers, end  
34 scrapers, and drills (Adams and Young 2007-TN10490). Paleoindian varieties in the Southeast  
35 include Cumberland, Suwannee, Simpson, Dalton and Quad point types (Elliott and Sassaman  
36 1995-TN10491).

37 In South Carolina, the Topper site has pre-Clovis and Clovis-era cultural deposits. Excavations  
38 below Clovis-era layers recovered small flakes tools, including side and end scrapers,  
39 spokeshaves, utilized flakes, graters, blades, cores, and choppers (Goodyear and Sain 2018-  
40 TN10492; Adams and Young 2007-TN10490). Radiocarbon dates obtained from a possible  
41 hearth area date the site to over 50,000 years BP. Recent excavations by Smallwood (2015-  
42 TN10493) in Clovis-era deposits recovered over 37,000 flaked lithic artifacts, including cores,  
43 debitage, tools, and hammerstones (2015-TN10493).

1 3.9.1.2 *Archaic Period (10000 BP–3000 BP)*

2 The Archaic period is documented as starting around 10,000 years ago and marks the transition  
3 from nomadic to more sedentary settlement patterns and increased subsistence on multiple  
4 resources including smaller game and plants. The Archaic period was considered to be a period  
5 of transition; a slow, progressive trend toward exploitation of forest niches, better technologies  
6 and networks of interaction and cultural diffusion that helped spread pottery, as well as food  
7 production and customs of politics and religion (Anderson and Sassaman 2012-TN10494).

8 The Archaic toolkit is typified by smaller projectile points, stone grinding implements, and tools  
9 such as projectile points, knives, drills, and scrapers. This period also saw the introduction of  
10 the atlatl, a small wooden or bone stick with a hook at one end used to propel darts or spears  
11 (Bense 1994-TN10495). In the Southeast, the Archaic Period is divided into three subperiods:  
12 Early (10000–8000 BP), Middle (8000–5000 BP), and Late Archaic (5000–3000 BP).

13 *Early Archaic (10000–8000 BP)*

14 In the Early Archaic, there was a continuation of semi-nomadic hunting and gathering. Modern  
15 game species were consumed instead of megafauna, which had become extinct by that time.  
16 Early Archaic tools included end scrapers, side scrapers, graters, adzes, and perishable items  
17 such as nets, traps, and basketry. Early Archaic typologies included side and corner notched  
18 projectile points such as Hardaway, Kirk, Taylor, and Big Sandy points and bifurcate points,  
19 such as MacCorkle, St. Albans, and LeCroy types (Elliott and Sassaman 1995-TN10491;  
20 Sassaman et al. 2002-TN10496).

21 *Middle Archaic (8000–5000 BP)*

22 During this time, temperatures were comparably higher than those of today. Deer population  
23 increased due to the abundance of vegetation. In the Southeast, levees, swamps, and oxbow  
24 lakes developed. Food resources such as mollusks and fowl increased (Anderson and  
25 Sassaman 2012-TN10494). Stemmed bifacial tool technology and the increased use of ground  
26 stones and bone mark this period. Stanley and Morrow Mountain stemmed points and  
27 lanceolate Guilford points are the most common point type of this subperiod. Adams and Young  
28 (2007) describe that Middle Archaic sites in South Carolina typically have more Morrow  
29 Mountain and Guilford types than Stanley points (Adams and Young 2007-TN10490). Other  
30 artifacts of the Middle Archaic include axes, atlatl weights, and grinding stones (Elliott and  
31 Sassaman 1995-TN10491).

32 *Late Archaic (5000–3000 BP)*

33 The Late Archaic is described as a time increased settlement permanence, growth in  
34 population, the intensification of subsistence, and technological innovation (Adams and Young  
35 2007-TN10490). Stone tool assemblages marking the Late Archaic include Savannah River  
36 Stemmed, Paris Island, Otter/Small Savannah River Stemmed, Kiokee Creek Stemmed and  
37 Gary Stemmed points.

38 A number of key developments emerged during this period. Axes, steatite vessels, and cooking  
39 stones appear more often in archaeological contexts. Settlement along river valleys increased,  
40 as seen in areas such as the Savannah River valley. Settlement along rivers provided  
41 consistent food sources such as shellfish and oyster, therefore allowing settlement for longer  
42 periods of time. Late Archaic populations also consumed resources such as nuts, acorns, and  
43 squash (Anderson and Sassaman 2012-TN10494).

1 The earliest pottery in the United States was developed during this period, around 4500 BP  
2 (Elliott and Sassaman 1995-TN10491). The earliest versions of ceramics were thick and  
3 tempered with fiber materials from plants, such as Spanish moss or palmetto palms. Pottery  
4 styles such as Stallings Island, Bilbo, St. Simons and Orange (Florida) correspond to this time  
5 period; however, Sassaman et al. (2006-TN10559) argues that Stalling Island pottery is the  
6 earliest form, originating in the coast and then diffusing to other parts of the region.

### 7 *3.9.1.3 Woodland Period (3000 BP to 1100 BP)*

8 The Woodland Period is represented by settled village life, more intensive plant cultivation  
9 (varieties of corn and wild rice), widespread adoption and elaborate variations of pottery, and  
10 the emergence of earthworks and associated burial complexes. Archaeologists typically  
11 consider the Woodland Period to be the era of regionalism, defined by Anderson and Sassaman  
12 (2012-TN10494) as the process of cultural differentiation leading to distinct traditions and  
13 communities across the Southeast. Similar to the Archaic, the Woodland Period is divided into  
14 three subperiods: the Early Woodland (3200–2200 BP), Middle Woodland (2200–1500 BP) and  
15 the Late Woodland (1500–1100 BP) (Anderson and Sassaman 2012-TN10494).

16 The development of agriculture was established in the Woodland Period. The scholarly  
17 understanding of agricultural practices of this phase is based on paleoethnobotanical evidence  
18 found in Woodland-era sites. Cultigens such as squash, sunflower, marshelder and chenopod  
19 began to be domesticated in the Late Archaic but their cultivation intensified during the  
20 Woodland Period (Anderson and Sassaman 2012-TN10494). Goosefoot, marshelder and  
21 sunflower were consumed during the Woodland, and these, along with maize, became more  
22 important during the subsequent Mississippian period.

#### 23 *Early Woodland (3200–2200 BP)*

24 During the Early Woodland, populations remained largely hunting and gathering societies.  
25 Pottery became more widespread; sand and grit replaced fiber for tempering pottery. Regional  
26 variations were represented by the way they were decorated. For example, cord or fabric  
27 impressions were applied to the pottery of the Middle Atlantic and Mid-south. Pottery from the  
28 South Appalachian and Gulf coastal areas exhibited more elaborate designs (Anderson and  
29 Sassaman 2012-TN10494). In the Piedmont region, Dunlap fabric was impressed and cord  
30 marked pottery and Swannanoa ceramics were common during this period. Projectile points  
31 from this era included Savannah River Stemmed and Swannanoa Stemmed points (Adams and  
32 Young 2007-TN10490).

33 Little is known about the Early Woodland in the Piedmont. The Kellogg phase of this period,  
34 mainly observed in Georgia, demonstrates settled communities on upland locations with well-  
35 defined structures, storage pits, and dense middens (Anderson and Sassaman 2012-TN10494;  
36 Wellings et al. 2023-TN10497). Shellfish, which was consumed heavily during the Late Archaic,  
37 appeared to be consumed less during this phase.

#### 38 *Middle Woodland (2200–1500 BP)*

39 Archaeologists distinguish the Middle Woodland Period primarily by variances in ceramics and  
40 artifacts. In the Piedmont, Pigeon, Cartersville, and Yadkin ceramics are typical Middle  
41 Woodland pottery types. Pigeon is quartz tempered and decorated with check stamped and  
42 simple stamped patterns. Cartersville pottery is tempered with either sand or grit, and is typically  
43 cord marked, although there have been some simple stamping and check stamping patterns  
44 observed (Adams and Young 2007-TN10490). Yadkin pottery is tempered with crushed quartz,

1 and decorated with fabric impressed, check stamped, linear check stamped, and simple  
2 stamped patterns (Wellings et al. 2023-TN10497). Non-pottery artifacts found from Middle  
3 Woodland cultural deposits include clay platform pipes, ground and polished stone ornaments,  
4 bone tools, engraved shell and bone, bifacial knives, and shark tooth pendants (Wellings et al.  
5 2023-TN10497).

6 One of the most defining features of this period is the emergence of burial mounds, which are  
7 characterized by monumental earth or stone works and elaborate mortuary practices (Bense  
8 1994-TN10495). The complexes are mainly found in high locations, such as hilltops. Woodland  
9 era mounds are most associated with the Hopewell culture of Ohio. As described by Anderson  
10 and Sassaman (2012-TN10494), mound complexes in the southeast are similar to Hopewell  
11 mounds as they are typically conical with central tombs. In some cases, mound complexes  
12 include platform mounds, a trait seen with Mississippian era-mounds. Associations between the  
13 Hopewell mounds and the complexes of the Southeast are based on the presence on  
14 Hopewellian objects in the archaeological record. This includes quartz crystals, flint blades,  
15 mica cutouts, shell and pearl beads, copper and ceramic earspools, and other exotic materials  
16 like obsidian and galena (Anderson and Sassaman 2012-TN10494).

17 Middle Woodland occupations are not well documented in the State, especially further inland  
18 (Wellings et al. 2023-TN10497). Examples of Middle Woodland mound complexes are seen at  
19 the Kolomoki site in southwest Georgia and the Pinson site in southwest Tennessee (Anderson  
20 and Sassaman 2012-TN10494).

#### 21 Late Woodland (1500 BP–AD 1100)

22 Cultural complexity declined during the Late Woodland. Smaller, political units began to appear  
23 and the production of elaborate burial complexes ceased. During this time, there was a shift  
24 toward smaller, more numerous dispersed habitation sites. This shift in settlement pattern  
25 appears to be a response to increased reliance on an agricultural subsistence strategy or  
26 intensification of resource procurement from upland areas (Adams and Young 2007-TN10490).  
27 Maize agriculture intensified, becoming more important by the end of the period. The bow and  
28 arrow was also introduced in the Late Woodland Period. Bow-launched points had greater  
29 impact, which further maximized wild game harvesting (Peskin 2011-TN9872). This change in  
30 technology allowed for greater hunting success over the dart and atlatl. It also may well be  
31 responsible for the dramatic increase in warfare seen in some areas (Bense 1994-TN10495;  
32 Walthall 1980-TN10498).

33 Increased use of ceramic vessels led to the manufacture of a variety of functional forms, such  
34 as larger storage vessels, jars, bowls, and plates. Ceramics began to be tempered with sand or  
35 grog (crushed potsherds). Late Woodland pottery includes the Napier type, fine sand-tempered  
36 ceramics with complicated stamped designs and the Hanover type, grog-tempered pottery with  
37 fabric impressed designs (Adams and Young 2007-TN10490; Wellings et al. 2023-TN10497).  
38 Middle Woodland era Cartersville pottery has also been found in Late Woodland deposits,  
39 although in reduced numbers.

#### 40 3.9.1.4 *Mississippian Period (AD 1100–1540)*

41 The Mississippian period began around AD 1000 and ended around the period of European  
42 contact in the 16th century. This period marks the development of chiefdoms, the growth of  
43 mound centers, and the spread of the Southeastern Ceremonial Complex, a regional belief  
44 system with similarity of artifacts, iconography, ceremonial centers, and mythology (Bense  
45 1994-TN10495). The De Soto expedition between 1539 and 1543 chronicled the various

1 Mississippian chiefdoms they encountered, providing an initial account of how Mississippian  
2 societies stood prior to the detrimental effects of contact (Anderson and Sassaman 2012-  
3 TN10494).

4 Mississippian societies were sociopolitical entities established along the floodplains of major  
5 rivers across the Southeast. Chiefdoms were large, fortified villages with central plazas  
6 surrounded by temple or mortuary mounds. Flat-topped temple mounds were constructed at  
7 these and other sites for religious practices. Surrounding settlements and farmsteads provided  
8 labor and services to the elite. Maize, along with beans and squash, was a major component of  
9 the precontact diet at this time (Anderson 1994-TN10499; Anderson and Sassaman 2012-  
10 TN10494). Sites such as Moundville in Alabama and Etowah in North Georgia were capitals of  
11 Mississippian chiefdoms.

12 Ceramics of this period include Pee Dee, Lamar, Savannah, and Etowah pottery. Pee Dee  
13 pottery consists of complicated stamping decoration along with reed punctation, and/or nodes,  
14 pellets, or narrow rim strips below the vessel rim (Adams and Young 2007-TN10490). Lamar,  
15 Savannah, and Etowah types are primarily identified by their complicated stamped designs,  
16 although simple stamped, checked stamped, and cord-marked varieties also occur.

17 The Mulberry site in central South Carolina is a major Mississippian site. Two Mississippian  
18 period archaeological sites located in the vicinity of the V.C. Summer site include the Blair  
19 Mound in Fairfield County and the McCollum Mound in Chester County (Adams and Young  
20 2007-TN10490; NRC 2011-TN1723).

### 21 3.9.1.5 *Contact and Historic Period (1540 to present)*

22 The Contact period is defined as the time period where the Spanish initially made contact with  
23 Indigenous groups in the Southeast. Early European contact was mainly restricted to the coast;  
24 however, in the mid-sixteenth century, passages to the interior were successful. Expeditions led  
25 by Hernando de Soto (1539–1543), Tristan de Luna (1559–1561), and Juan Pardo (1566–1568)  
26 were both significant and catastrophic (Anderson and Sassaman 2012-TN10494). Europeans  
27 brought diseases with them, consequently killing a large portion of the Indigenous population  
28 who were not immune to such diseases.

29 South Carolina was established in 1670 with the founding of Charleston and was divided into  
30 South and North Carolina in 1710 (Adams and Young 2007-TN10490). Permanent European  
31 settlement did not occur in the Fairfield County area until the early 1740s with settlement  
32 occurring along the Broad River. South Carolina ratified the United States Constitution on  
33 May 23, 1788, becoming the eighth State to enter the Union. During the American Revolution,  
34 many settlers in the area were divided between the British and Patriot sides, which resulted in  
35 several skirmishes. With the culmination of the war during the nearby Battle of Cowpens, the  
36 British eventually withdrew from Charleston in 1782 (Adams and Young 2007-TN10490).

37 Early settlement of Fairfield County occurred in the mid-1700s. In December 1832, Winnsboro  
38 was incorporated as a town (NRC 2004-TN7262). Cotton production and plantations were  
39 established in the area in the 1800s and increased during the 1850s. An increase in slave  
40 populations accompanied the increase in cotton plantations in the area (Adams and Young  
41 2007-TN10490). Cotton remained the main crop until the 1930s when it declined as a result of  
42 hard economic times, the boll weevil, and depletion of the area's topsoil. During the late 19th  
43 century, the Civil War and Reconstruction period resulted in major economic social adjustments  
44 in the area. Camp Pearson, a Civilian Conservation Corps camp was established in 1933 as a  
45 soil erosion camp at Parr, which is located just south and west of the V.C. Summer site (Adams  
46 and Young 2007-TN10490).

1 3.9.1.6 Tribes

2 During the Contact period, at least 29 distinct Tribes and indigenous groups lived in South  
3 Carolina. Each group had a separate dialect, many of which were distinct languages. The  
4 common language families were Algonquian, Iroquoian, Muskogean, Siouan, and Yuchi. By  
5 1750, the smaller Indian Tribes throughout South Carolina disappeared, most likely joining  
6 larger Tribes, such as the Catawba and Cherokee of South Carolina or the Creeks of Georgia  
7 (NRC 2004-TN7262).

8 The proposed action area is within the ancestral lands of the Catawba Nation (Catawba) and  
9 the Eastern Band of Cherokee Indians. The Catawba's lands originally extended through the  
10 Piedmont region of North and South Carolina through southern Virginia (Catawba 2024-  
11 TN10500). The Eastern Band of Cherokee Indians historically used the region north in present-  
12 day Kentucky and Tennessee through the northern regions of Alabama, Georgia, and South  
13 Carolina (NLD 2022-TN10501). It is estimated that the Catawba's population prior to contact  
14 was up to 25,000 people. By the 1800s, their population had been reduced to under 100 citizens  
15 (Catawba 2024-TN10500).

16 The Catawba signed the Treaty of Augusta in 1763, which established their reservation in now  
17 present-day Rock Hill, about 70 mi (113 km) north of the project area. In 1830, the Indian  
18 Removal Act was passed by the U.S. government. In 1838, the Cherokee Indians, along with  
19 other Indigenous groups in the Southeast, were forcibly removed from their homelands in  
20 Georgia, Alabama, and Tennessee to live in Indian Territory, located in present-day  
21 Oklahoma—which became known as the Trail of Tears (NPS 2023-TN10502). The Catawba  
22 were able to remain in South Carolina throughout the 1800s because of the 1763 Treaty of  
23 Augusta. In 1944, the Catawba established a constitution under the Indian Reorganization Act  
24 and were self-governed until 1959, when the Nation was terminated under several termination  
25 policies enacted by Congress (Loftis 1994-TN10503). In 1973, the Catawba filed a petition with  
26 Congress to gain Federal recognition. Twenty years later, in 1993, they received their Federal  
27 recognition.

28 Today, the Catawba are the only Federally recognized Tribe that resides in South Carolina, with  
29 over 3,300 enrolled members in the Nation. In addition to the Catawba, several Tribal groups  
30 and descendants still remain in South Carolina today, including the Cherokee, Pee Dee,  
31 Chicora, Edisto, Santee, and Chicora-Waccamaw Tribes (SCCMA 2024-TN10504).

32 **3.9.2 Historic and Cultural Resources at V.C. Summer**

33 Historic and cultural resources within the V.C. Summer site can include prehistoric and historic  
34 era archaeological sites, historic districts, buildings, structures, and objects. Historic and cultural  
35 resources also include traditional cultural properties that are important to a living community of  
36 people for maintaining their culture. "Historic property" is the legal term for a historic or cultural  
37 resource that is included on, or eligible for inclusion on, the NRHP. To gain a better  
38 understanding of the archaeological resources within the region, a literature review was  
39 conducted through the SCDAH's "ArchSite" electronic database using a 1 mi (1.6 km) radius to  
40 the APE to identify all historic properties that could be potentially affected by the undertaking.  
41 This information helps cultural resources professionals understand what resources may  
42 potentially be in the APE.

43 A total of 60 archaeological sites, 43 historic-age buildings, and one cemetery are within the  
44 APE and 1 mi (1.6 km) radius. Twenty-four sites are within the APE. Of the 24, 14 are

1 precontact, 6 are historic, and 3 sites are multicomponent, consisting of both precontact and  
2 historic components. The discussions below describe the previously identified archaeological  
3 resources, cemetery, and historic-age buildings.

#### 4 Previously Recorded Historic and Archaeological Resources

5 Three sites within the 1 mi (1.6 km) radius are eligible for the NRHP: FA360, FA366, and  
6 NE0008. Sites FA360 and FA366 were recorded in 2009 by New South Associates as part of an  
7 addendum survey for improvements within V.C. Summer. The site is a small Woodland Period  
8 ceramic and lithic scatter site recommended eligible for the NRHP. Site FA366 is a small  
9 undiagnostic lithic scatter site. The site was recommended as potentially eligible for its potential  
10 to yield information that may tie it to a particular time period. It was recommended that Phase II  
11 testing occur at the site to confirm NRHP eligibility if it could not be avoided by project activities.

12 NE0008 was first recorded in 1972 by George Teague as a small Archaic period lithic scatter  
13 consisting of quartzite flakes, secondary flakes, a scraper, biface fragments, and a possible  
14 Guilford projectile blank. Further testing was recommended at the time. S&ME revisited the site  
15 during their 2014 field investigations, excavating an additional 35 shovel tests within the site  
16 (Nagle and Carpini 2014-TN10505). Close to 400 precontact artifacts were collected from the  
17 surface and from the shovel testing, including Deptford pottery fragments, a Savannah River  
18 point, bifaces, scrapers, utilized flakes, steatite vessel fragment, and lithic debitage. The site  
19 was recommended as potentially eligible pending Phase II testing for eligibility confirmation and  
20 potential mitigation. In 2016, the site was revisited by Terracon for Phase II evaluative testing.  
21 Over 1,300 artifacts were recovered, and two features were identified from ten 1 × 1 m test  
22 units. Based on the fieldwork, the site was determined eligible for the NRHP (ArchSite 2024-  
23 TN10560).

#### 24 Pearson Cemetery

25 The Pearson Cemetery is within the 1 mi (1.6 km) radius of the project APE. The cemetery is an  
26 early-to-late 19th century cemetery located approximately 1,000 m (3,820 ft) west of the in-  
27 scope transmission lines. The cemetery is named after General John Pearson, a Revolutionary  
28 War veteran who served as a major during the war. The Richard Winn chapter of the  
29 Daughters of the American Revolution erected a monument in 1934 at the (assumed) Pearson  
30 gravesite. The front of the monument reads, “Erected to the patriotism and valor of John  
31 Pearson May 30, 1743–Oct. 25, 1819. He served in state militia throughout the revolution rising  
32 to rank of major was promoted to brigadier general in 1800.” The back of the monument has a  
33 small bronze plate reading, “Revolutionary Solider 1775–1783.”

34 The cemetery was delineated in 2006 and formally registered as a site in 2007 by New South  
35 Associates. There are at least 32 known burials, although the presence of unmarked  
36 depressions suggest additional burials may be present (Adams and Young 2007-TN10490). The  
37 cemetery was recommended as potentially eligible under Criteria Consideration C, in which a  
38 birthplace or grave of a historical figure can be eligible if the person is of “outstanding  
39 importance” and if there is no other appropriate site or building directly associated with his or  
40 her productive life (Potter and Boland 1992-TN10506). Pearson’s grave and the associated  
41 Daughters of the American Revolution monument was recommended as eligible under Criteria  
42 Consideration D, in which a cemetery is eligible if it derives its primary significance from graves  
43 of persons of transcendent importance, from age, from distinctive design features, or from  
44 association with historic events” (Potter and Boland 1992-TN10506). New South recommended  
45 that a registered surveyor map their suggested boundaries and SCE&G construct a fence to  
46 protect the cemetery (Adams and Young 2007-TN10490). SCE&G installed the fence.

1 Historic Buildings

2 A total of 43 historic-age buildings have been documented within the APE and 1 mi (1.6 km)  
3 radius. Of those, two are considered eligible for the NRHP. The White Hall Elementary School is  
4 located approximately 1,370 ft (418 m) northeast of the APE, along SC 215. The elementary  
5 school is a 1954 equalization school constructed as part of South Carolina’s effort to integrate  
6 African-American children in the State’s education system following the lawsuit *Briggs vs. Elliott*.  
7 Local parents sued the Clarendon County School District in 1949 for lack of access to a school  
8 bus for black students (Dobrasko 2008-TN10507; NPS 2024-TN10508). The lawsuit eventually  
9 led Governor James Byrnes to fund a statewide school construction program in an attempt to  
10 improve and equalize schools for both black and white students. Over 700 equalization schools  
11 were constructed in the State, the majority between 1951 and 1959 (Dobrasko 2008-TN10507).  
12 In 1989, the school district sold the property to the original African-American land owners. The  
13 property remains in their family today (ArchSite 2024-TN10561).

14 The second historic property is the Fairfield Pumped Storage Development Facility, within the  
15 APE. The facility was registered by S&ME in 2014 as part of FERC’s Parr Hydroelectric Project.  
16 At the time, it did not meet the 50-year age requirement to evaluate the facility for potential  
17 listing on the NRHP but was preliminarily done so as the building would become 50 years old  
18 within the duration of FERC’s licensing period (around 2028). The facility was constructed  
19 between 1974 and 1978 and consists of a powerhouse, four steel penstocks, a substation,  
20 office/maintenance building, four earthen dams, and a reservoir. The facility produces  
21 hydroelectric power by using two reservoirs, discharging water from the upper Monticello  
22 Reservoir into the lower Parr Reservoir to generate power during peak times. Water used for  
23 generation is pumped back into the upper reservoir during lower power times. The process is  
24 considered unique in comparison to traditional hydroelectric generating facilities (Nagle and  
25 Carpini 2014-TN10505). S&ME recommended the facility as potentially eligible for the NRHP  
26 under Criterion A for its association with increased power consumption and growth in the  
27 Midlands area of South Carolina during the 1970s and under Criterion C for its engineering  
28 components associated with the pumped storage system (Nagle and Carpini 2014-TN10505). In  
29 2023, SEARCH, Inc. revisited the facility during their architectural survey of the V.C. Summer  
30 plant for the proposed action. SEARCH concurred with S&ME’s determination that the facility  
31 was eligible under Criteria A and C. On April 7, 2024, the South Carolina SHPO concurred with  
32 SEARCH’s recommendation that the Fairfield Pumped Storage Development Facility remains  
33 eligible for listing in the NRHP (Dominion 2023-TN10387).

34 The remaining 41 historic-age properties include three homes constructed in 1900, 1940, and  
35 1950 and V.C. Summer’s facilities (ArchSite 2024-TN10562). The three homes were surveyed  
36 as part of local undertakings, all considered not eligible for the NRHP (Revels 2003-TN10563).  
37 SEARCH recorded and evaluated 38 facilities, recommending them as not eligible for inclusion  
38 on the NRHP due to their lack of historic, engineering, and/or architectural significance  
39 (Travisano et al. 2023-TN10509). The South Carolina SHPO concurred with the finding on  
40 April 7, 2023, and recommended re-evaluating the buildings as a historic district during NRC’s  
41 next license renewal (around 2042).

42 Previous Surveys

43 A portion of the APE was reviewed by New South Associates for the construction of Units 2 and  
44 3 at V.C. Summer (Adams and Young 2007-TN10490; Adams and Valk 2007-TN10564; Adams  
45 2009-TN10510; NRC 2011-TN1723). Between 2006 and 2009, the majority of the southern  
46 portion of the APE was surveyed archaeologically as part of that proposed action. Section 2.7.2



1 of the V.C. Summer Units 2 and 3 COL EIS (NRC 2011-TN1723: pp. 2-131 through 2-142)  
2 provides a comprehensive discussion of the previously registered sites and surveys in the area,  
3 and the NRC hereby incorporates Section 2.7.2 of the V.C. Summer Units 2 and 3 COL EIS by  
4 reference. Since the publication of the 2011 Combined License Application EIS, four  
5 archaeological surveys and one architectural survey have been documented within 1 mi  
6 (1.6 km) of the project area. The four archaeological surveys and one architectural survey are  
7 discussed below.

8 In 2011, Brockington and Associates, Inc. (Brockington) led a Phase I archaeological survey of  
9 an approximately 20 mi (32.1 km) section of SCE&G's VCS2-Lake Murray 230 kV Line No. 2/SL  
10 George 230 kV Line No. I Transmission Line Corridor across Fairfield, Lexington, Newberry and  
11 Richland counties (Pappas and Bailey 2011-TN10511). A total of 1,415 shovel tests were  
12 excavated across the 20 mi (32.1 km) transmission line corridor, resulting in four archaeological  
13 sites being recorded. All the sites consisted of precontact lithic scatters with the exception of site  
14 RD1380, which also included an old outbuilding. None of the four sites were recommended  
15 eligible for the NRHP. A third transmission line project was performed by AF Consultants in  
16 summer 2011 for Santee Cooper. AF Consultants excavated 104 shovel tests for the proposed  
17 3.1 mi (5 km) 230kV transmission line corridor. No cultural material was encountered (Drucker  
18 et al. 2012-TN10512).

19 In 2012, Brockington excavated an additional 158 shovel tests as part of an addendum survey  
20 to the Pappas and Bailey (2011-TN10511) one, surveying a 14 mi (22.5 km) stretch of the  
21 VCS1-Killian 230 kV Winnsboro Junction to the Winnsboro transmission line for proposed  
22 improvements (Futch 2012-TN10513). The survey occurred approximately 500 m (1640 ft) east  
23 of the proposed action APE. One archaeological site and two isolates were registered. Site  
24 FA373 was recorded as a high-density precontact lithic scatter site with artifacts dating the site  
25 to the Middle Archaic and Mississippian. Isolated Find 1 consisted of two historic ceramic  
26 sherds while Isolated Find 2 was identified as a flaked stone tool. None of the sites were eligible  
27 for the NRHP.

28 On behalf of SCE&G, S&ME did a Phase I survey for the Parr Hydroelectric Project in Fairfield  
29 and Newberry counties in 2014 as part of a FERC licensing project (Nagle and Carpini 2014-  
30 TN10505). The northern half of the proposed action APE intersects with portions of S&ME's  
31 2014 archaeological survey. The Phase I survey consisted of surveying 70 different areas  
32 (totaling 3,375 ac [1,366 ha]) within the 15,637 ac (6,328 ha) APE considered to have a high  
33 probability of containing significant cultural resources. The remaining 12,262 ac (4,962 ha) were  
34 determined to have low potential for cultural resources. The field survey also included an  
35 architectural survey for above-ground resources. Inventories for eight previously recorded  
36 archaeological sites were also updated. S&ME recommended Lyles Ford and the Parr Shoals  
37 Development Facility (Structure 39-0081) eligible for the NRHP. Eleven archaeological sites  
38 were recommended as needing further work to determine their final NRHP eligibility. The Blair  
39 Mound site, which was already listed on the NRHP, was determined to not be impacted by the  
40 undertaking. All are outside of the APE.

41 The NRHP-eligible resource within the current project area, Fairfield Pumped Storage  
42 Development Facility, was recorded as part of the S&ME 2014 survey. Although the facility has  
43 not reached the 50-year age mark for consideration for inclusion on the NRHP, it was evaluated  
44 as the building would become 50 years old within FERC's licensing period (around 2028).  
45 S&ME recommended the facility as potentially eligible under Criterion A for its association with  
46 increased power consumption and growth in the Midlands area of South Carolina during the  
47 1970s and under Criterion C for its engineering components associated with the pumped  
48 storage system (Nagle and Carpini 2014-TN10505).

1 On behalf of Enercon and as part of the proposed action, SEARCH performed an intensive-level  
2 architectural survey of the V.C. Summer site. As stated in the previous section, SEARCH  
3 inventoried 38 facilities (the nuclear reactor and its associated 11 buildings were considered one  
4 resource) and revisited the potentially NRHP-eligible Fairfield Pumped Storage Development  
5 Facility. SEARCH concurred with the original S&ME determination of eligibility that the facility is  
6 potentially eligible under Criteria A and C, and recommended the remaining 38 resources as not  
7 eligible for inclusion on the NRHP due to their lack of historic, engineering, and/or architectural  
8 significance (Travisano et al. 2023-TN10509). The South Carolina SHPO concurred with the  
9 finding from April 7, 2023, and recommended re-evaluating the buildings during the next license  
10 renewal (around 2042).

### 11 **3.9.3 Procedures and Integrated Cultural Resources Management Plan**

12 Dominion has one procedure to identify, protect, and minimize potential impacts to cultural  
13 resources. *Drilling, Digging, and Cutting (SA-AA-106)* outlines the appropriate actions to  
14 implement when historic or archaeological resources are discovered (2024-TN10391). It  
15 describes how to execute stop work notifications, including informing plant environmental  
16 personnel to evaluate any finding(s) and determine the appropriate course of action. The  
17 *Drilling, Digging, and Cutting* procedure includes how to address inadvertent discoveries of  
18 human remains.

19 During the environmental audit, the NRC staff requested additional information from Dominion  
20 pertaining to their procedure, including what steps were taken by their staff to protect unknown  
21 and known historic and archaeological resources prior to ground-disturbing activities in  
22 undisturbed areas, procedure(s) that stipulate that requirement, and procedures on how the  
23 unanticipated discovery of human remains is handled (2024-TN10391). Dominion responded  
24 that they engage their environmental group in the early planning stages of their projects to  
25 follow Dominion’s Corporate Environmental Due Diligence Policy. Part of the process is to learn  
26 what potential historic and cultural resources may be within their project area and, if applicable,  
27 conduct pertinent archaeological surveys for undisturbed areas. If cultural material is found  
28 during those surveys, the areas are flagged, and the information is shared during pre-job  
29 briefings with project personnel. Resources are avoided during the implementation of the project  
30 to minimize disturbances (Dominion 2024-TN10391).

### 31 **3.9.4 Proposed Action**

32 As documented in the 2024 LR GEIS (NRC 2024-TN10161) and shown in Table 3-2, the NRC  
33 staff identified one plant-specific Category 2 issue related to historic and cultural resources  
34 applicable to V.C. Summer during the SLR term. This Category 2 issue (historic and cultural  
35 resources) is analyzed below.

36 Section 106 of the NHPA of 1966, as amended (54 U.S.C. § 306108-TN4839), requires Federal  
37 agencies to take into account the effects of their undertakings on historic properties. Issuing a  
38 subsequent renewed operating license to a nuclear power plant is a Federal undertaking that  
39 could potentially affect historic properties. Historic properties are defined as resources included  
40 on, or eligible for inclusion on, the NRHP. The criteria for eligibility are listed in 36 CFR 60.4  
41 “Criteria for Evaluation,” (TN1682) and include (A) association with significant events in history;  
42 (B) association with the lives of persons significant in the past; (C) embodiment of distinctive  
43 characteristics of type, period, or construction; and (D) resources that have yielded, or are likely  
44 to yield, important information.

1 3.9.4.1 *Consultation*

2 In accordance with 36 CFR 800.8, “Coordination with the National Environmental Policy Act,” on  
3 November 3, 2023, the NRC staff initiated written Section 106 consultations with the Advisory  
4 Council on Historic Preservation (NRC 2023-TN10514), the SCDAH (NRC 2023-TN10514), and  
5 four Tribes, including the Catawba Nation, Cherokee Nation, Eastern Band of Cherokee Indians,  
6 and the Muskogee Creek Nation (NRC 2023-TN10514). In these letters, the NRC staff provided  
7 information about the proposed action, defined the APE, and indicated that the NHPA review  
8 would be integrated with the NEPA process, in accordance with 36 CFR 800.8(c) (TN513). The  
9 NRC staff invited participation in the identification of, and possible decisions concerning, historic  
10 properties and participation in the scoping process.

11 On November 22, 2023, the SCDAH concurred with the APE as described by the NRC but  
12 requested that the APE be defined and illustrated on maps. The SCDAH reaffirmed their review  
13 of SEARCH’s architectural survey report, and concurred with the recommendation that the  
14 39 buildings and structures recorded at the V.C. Summer site do not meet the criteria for listing  
15 on the NRHP. The SCDAH recommended that the V.C. Summer site be re-evaluated for  
16 eligibility if a future subsequent license renewal was pursued (SCDAH 2023-TN10515). No  
17 additional responses were received. Appendix C to this SEIS lists all consultation documents.

18 On May 17, 2024, the NRC staff held a teleconference with the SCDAH (NRC 2024-TN10516).  
19 During the teleconference, the NRC and SCDAH staff discussed the scoping comments dated  
20 November 22, 2023, which were submitted by the SCDAH to the NRC with respect to this  
21 undertaking. This included consultation with Federally recognized Tribes, clarification of the  
22 APE, and the architectural survey commissioned by Dominion and conducted by SEARCH.

23 On September 23, 2024, the NRC staff provided written clarification of the APE to consulting  
24 parties. Written correspondence illustrated the APE on maps as shown in Figure 3-11 of this  
25 SEIS (NRC 2024-TN10592). On October 24, 2024, the SCDAH concurred with the NRC’s  
26 written clarification of the APE (SCDAH 2024-TN10836). On October 28, 2024, the Cherokee  
27 Nation acknowledged receipt of the APE clarification correspondence (Cherokee Nation 2024-  
28 TN10837).

29 3.9.4.2 *Findings*

30 NRHP-eligible sites FA360, FA366, and the Fairfield Pumped Storage Development Facility are  
31 within the APE and may be impacted by the proposed action. Site FA360 is a Middle and Late  
32 Woodland camp site determined eligible in 2009 under Criterion D. The site’s intact deposits  
33 can provide important information on Middle to Late Woodland settlement systems, patterns,  
34 and resource procurement from a time period that is overall poorly understood in the South  
35 Carolina Piedmont (Adams 2009-TN10510). Dominion has identified that one project is planned  
36 in 2025 to rebuild the remaining above-ground wooden H-frame style transmission poles on the  
37 Parr Generating Complex to V.C. Summer transmission line. Dominion indicated that the work  
38 would occur within the existing corridor in areas that have been previously disturbed (2024-  
39 TN10391). Site FA360 is adjacent to the transmission line corridor but outside of immediate  
40 areas where these planned activities may occur. Based on this, FA360 would not be adversely  
41 impacted by the proposed transmission pole upgrades or the SLR. Site FA366 is a small  
42 precontact lithic scatter recommended as potentially eligible in 2009 for its potential to yield  
43 information that may tie it to a particular time period (Adams 2009-TN10510). The site would be  
44 avoided by project activities and, therefore, would not be impacted by the proposed action.

1 The Fairfield Pumped Storage Development Facility (Structure 39-0082) was constructed  
2 between 1974 and 1978 and was recommended potentially eligible for the NRHP by S&ME in  
3 2014. The facility was visited during the onsite environmental audit in May 2024 to determine if  
4 the proposed action would potentially affect the facility. Dominion has not identified any  
5 refurbishment activities that would change the facility or alter characteristics that continue to  
6 make the facility potentially eligible. Operations would continue as normal; therefore, the facility  
7 would not be adversely impacted by the SLR.

8 Three eligible sites are outside of the APE but may be indirectly affected by the undertaking  
9 given their proximity to the V.C. Summer site. The Pearson Cemetery (FA330) was  
10 recommended potentially eligible in 2007 by New South Associates under Criteria Consideration  
11 C, in which a birthplace or grave of a historical figure can be eligible if the person is of  
12 “outstanding importance” and if there is no other appropriate site or building directly associated  
13 with his or her productive life (Adams and Young 2007-TN10490). The cemetery is at a higher  
14 elevation than the rest of the V.C. Summer site and outside the viewshed of the V.C. Summer  
15 facilities. It is protected by a fence and a canopy of trees that obstructs the rest of the facilities  
16 from its viewshed. Any ongoing operations and maintenance activities would not impact the  
17 cemetery. Similarly, the proposed action would not adversely affect the NRHP-eligible 1954  
18 White Hall Elementary School. The elementary school cannot be seen from the V.C. Summer  
19 site and is protected by trees and private homes which provide a buffer from the site.

20 Site NE0008 is an Archaic and Woodland Period lithic scatter site originally recorded in 1972.  
21 The site was recommended eligible in 2013 by S&ME when they revisited the site and conducted  
22 subsurface testing. Minor impacts to the site may occur based on the fluctuating river or reservoir  
23 levels associated with the Parr Shoals Dam. In 2013, S&ME noted the site erosion during their  
24 site visit. As a result in 2016, FERC, who has regulatory authority over the Parr Shoals Dam and  
25 the Fairfield Pumped Storage Facility, executed a Historic Properties Management Plan with the  
26 SCDAAH and Dominion to address potential impacts to historic properties, including NE0008. It  
27 was recommended that erosion be minimized through stabilization of the shoreline. If that was  
28 not possible, it was recommended that adverse effects be resolved through data recovery of the  
29 site. While indirect, the renewal of the SLR would allow Dominion to continue operations on the  
30 Fairfield Pumped Storage Facility, which is connected to the Parr Shoals Dam. The NRC staff  
31 reviewed the Historic Properties Management Plan (HPMP) and determined that the SLR would  
32 not add additional impacts not already considered by FERC in their HPMP.

33 In conclusion, no new construction or modifications are anticipated for the proposed action.  
34 Plant operations and maintenance activities necessary to support the continued operation would  
35 be limited to previously disturbed areas and would be expected to be similar to current  
36 operations. For the purposes of NHPA, the proposed action will result in *No Adverse Effect* to  
37 historic properties, as defined in 36 CFR 800.5(b) (TN513).

### 38 **3.9.5 No-Action Alternative**

39 Under the no-action alternative, the NRC would not renew the operating license, and the power  
40 plant would begin decommissioning at or before the expiration of the current license. Land-  
41 disturbance activities or dismantlement would not be anticipated, as these would be conducted  
42 during decommissioning. Therefore, facility shutdown and adoption of the no-action alternative  
43 would have no immediate effect on historic properties, or on historic and cultural resources.  
44 Known historic properties and cultural resources at V.C. Summer would be unaffected if the  
45 NRC does not renew the operating license and Dominion terminates reactor operations.

1 As stated in the Decommissioning GEIS (2002-TN7254), the NRC staff concluded that impacts  
2 on cultural resources would be SMALL at nuclear plants where decommissioning activities  
3 would only occur within existing industrial site boundaries. Impacts cannot be predicted  
4 generically if decommissioning activities would occur outside of the previously disturbed  
5 industrial site boundaries, because impacts depend on site-specific conditions. In these  
6 instances, impacts could only be determined through site-specific analysis (NRC 2002-TN665).  
7 In addition, under 10 CFR 50.82, "Termination of License," power reactor licensees are required  
8 to submit a post-shutdown decommissioning activities report to the NRC, which must describe  
9 the plant's planned decommissioning activities (TN249).

10 Until the post-shutdown decommissioning activities report is submitted, the NRC staff cannot  
11 determine whether historic properties would be affected outside the existing industrial site  
12 boundary by decommissioning activities after the nuclear power plant ceases operations.

### 13 **3.9.6 Replacement Power Alternatives: Common Impacts**

14 Impacts to cultural resources from construction and operation of a replacement power  
15 alternative would be dependent on the site at which these efforts are localized. For construction,  
16 impacts to historic properties would vary depending on the degree of ground disturbance (i.e.,  
17 land clearing, excavations), visual intrusions on the landscape, noise from the construction and  
18 operation of the alternative, etc. If the project has a Federal nexus (i.e., license, permit), the  
19 Federal agency would need to make a reasonable effort to identify historic properties within the  
20 area of potential effects and consider the effects of their undertaking on historic properties, in  
21 accordance with Section 106 of the NHPA. Identified historic and cultural resources would need  
22 to be recorded and evaluated for eligibility for listing on the NRHP. If historic properties are  
23 present and could be affected by the undertaking, adverse effects would be assessed,  
24 determined, and mitigated with the SHPO and any Tribe that attaches religious and cultural  
25 significance to identified historic properties through the Section 106 consultation process.

26 Similar to construction, the potential for impacts from the operation of replacement power  
27 alternatives would be dependent on ground disturbing activities, visual intrusions, noise, etc.  
28 associated with plant operations, ongoing maintenance, modifications to the facility, and/or  
29 transmission lines. Areas subject to ground disturbance would need to be surveyed to identify  
30 and record any historic and cultural material encountered, if applicable. The appearance of the  
31 alternative power-generating facility and transmission lines could also result in alterations to the  
32 visual setting which, whether temporary or permanent, could affect other types of historic and  
33 cultural resources such as cultural landscapes, architectural resources, or TCPs. Impacts would  
34 vary dependent on plant heights, associated exhaust stacks, or cooling towers.

### 35 **3.9.7 Natural Gas Alternative**

36 The NGCC plant would consist of multiple combustion turbines, a heat recovery steam  
37 generator, and a steam turbine generator. As proposed, the NGCC plant would be constructed  
38 at the abandoned V.C. Summer Units 2 and 3 site, south of Unit 1. The alternative could use the  
39 existing natural gas transmission pipeline within the site but would need minor construction to  
40 extend the pipeline for connectivity. Section E7.2.2.1.8 of the ER states that the extension could  
41 join the existing pipeline at the Parr Generating Complex crossing the abandoned V.C. Summer  
42 Unit 2 and Unit 3 site. This would also avoid property that was not reviewed under the 2011  
43 Combined License Application EIS.

1 The ER identified that this alternative may result in a potential adverse effects due to potential  
2 impacts to the NRHP-eligible Pearson Cemetery. Specific site location, plant design, layout of  
3 buildings, vertical and horizontal depth of planned ground disturbance, operations, and  
4 maintenance activities would be needed to determine if impacts would be adverse or could be  
5 avoided. If impacts are to be adverse, additional consultation with the South Carolina's SHPO,  
6 Tribes, and consulting parties would be needed to mitigate such effects.

### 7 **3.9.8 New Nuclear (Small Modular Reactor) Alternative**

8 Impacts of this alternative would be similar to the common impacts described at the beginning of  
9 the section. Direct, indirect, visual, and auditory impacts would be dependent on the specific site  
10 location, plant design, layout of buildings, vertical and horizontal depth of planned ground  
11 disturbance, operations, and maintenance activities. Depending on where within the 130 ac  
12 (52.6 ha) the SMR is constructed, impacts to known cultural resources and historic properties  
13 may occur. Additional considerations to impacts would need to be considered if the existing (but  
14 abandoned) V.C. Summer Units 2 and 3 and associated facilities would be removed prior to  
15 construction. Removal of the facilities may directly or indirectly impact historic properties in the  
16 area.

### 17 **3.9.9 Natural Gas and Solar Combination Alternative**

18 Implementation of this alternative would require more land than the other alternatives  
19 considered. In general, using previously disturbed industrial sites for construction and  
20 land-based installations or associated infrastructure could minimize impacts to historic and  
21 cultural resources. The use of existing footprint within the Units 2 and 3 construction site for the  
22 natural gas component could avoid and/or minimize impacts to known resources in the area but  
23 would require minor construction to extend the pipeline for connectivity. For the solar  
24 component and the new 345 kV transmission line, impacts would be dependent on the locations  
25 chosen. However, if a previously disturbed site is not selected or is not within an existing ROW,  
26 natural and cultural resources surveys should occur prior to determine the presence or absence  
27 of potential features.

### 28 **3.9.10 New Nuclear and Solar Combination Alternative**

29 Impacts on historic and cultural resources from this alternative would include those discussed  
30 above as impacts common to all replacement alternatives. The use of the existing footprint  
31 within the abandoned V.C. Summer Units 2 and 3 construction site could avoid and/or minimize  
32 impacts to known resources in the area. For the solar component and the new 345 kV  
33 transmission line, impacts would be dependent on the locations chosen. If a previously  
34 disturbed site is not selected or is not within the existing ROW, natural and cultural resources  
35 surveys should occur prior to determine the presence or absence of potential features.

## 36 **3.10 Socioeconomics**

37 This section describes current socioeconomic factors that have the potential to be affected by  
38 changes in nuclear power plant operations at the V.C. Summer site. V.C. Summer and the  
39 communities that support it can be described as a dynamic socioeconomic system. The  
40 communities support the people, goods, and services required to operate the nuclear power  
41 plant. Nuclear power plant operations, in turn, supply wages and benefits for people as well as  
42 dollar expenditures for goods and services. The measure of a community's ability to support

1 V.C. Summer’s operations depend on the community’s ability to respond to changing  
2 environmental, social, economic, and demographic conditions.

### 3 **3.10.1 Nuclear Power Plant Employment**

4 The socioeconomic ROI is defined by the areas where V.C. Summer workers and their families  
5 reside, spend their income, and use their benefits, thus affecting the economic conditions of the  
6 region. In 2022, Dominion employed a permanent workforce of 613 workers and an additional  
7 376 long-term contract workers (Dominion 2023-TN10387). Approximately 92 percent of  
8 V.C. Summer permanent workers reside in the counties of Lexington (41 percent of the  
9 workers), Richland (28 percent of the workers), Newberry (15 percent of the workers), and  
10 Fairfield (7 percent of the workers). The remaining workers are spread among other counties in  
11 South Carolina, North Carolina, Connecticut, Tennessee, and Virginia (Dominion 2023-  
12 TN10387). Because most of V.C. Summer’s permanent workers are concentrated in the  
13 abovementioned four-county area, the greatest socioeconomic effects are likely to be  
14 experienced there. Consequently, for the analysis provided below, the focus is on the  
15 socioeconomic impacts of continued V.C. Summer operation on these four counties, which are  
16 defined as the “socioeconomic ROI.”

17 Refueling and maintenance outages for V.C. Summer are on an 18-month cycle. Refueling  
18 outages last approximately 33–40 days and an additional 850 contract workers are onsite during  
19 a typical outage.

### 20 **3.10.2 Regional Economic Characteristics**

21 Goods and services are needed to operate V.C. Summer. Although procured from a wider  
22 region, some portion of these goods and services are purchased directly from within the  
23 socioeconomic ROI. These transactions sustain existing jobs and maintain income levels in the  
24 local economy. This section presents information on employment and income in the  
25 V.C. Summer socioeconomic ROI.

26 According to the U.S. Census Bureau’s (USCB) 2018–2022 American Community Survey  
27 5-Year Estimates, the educational services and healthcare and social assistance industry  
28 represented the largest employment section in the socioeconomic ROI, followed by retail trade  
29 (USCB 2022-TN10423). The civilian labor force in the socioeconomic ROI was 389,226 persons  
30 and the number of individuals employed was 366,939 (USCB 2022-TN10423). Estimated  
31 income information for the socioeconomic ROI is presented in Table 3-16 below. As shown in  
32 Table 3-16, people living in Lexington County had a higher median household income and per  
33 capita income than the State average, while people living in the other three counties had a lower  
34 median household income and per capita income less than the State average. Additionally, the  
35 percentages of individuals living below the poverty level in Richland County, Newberry County  
36 and Fairfield County are higher than the State average.

37 According the USCB 2018–2022 American Community Survey 5-Year Estimates, the  
38 unemployment rates in Lexington County, Richland County, Newberry County and Fairfield  
39 County were 4.4, 6.8, 3.9, and 6.9 percent, respectively. Comparatively, the unemployment rate  
40 in South Carolina during the same time period was 5.2 percent (USCB 2022-TN10423).

1 **Table 3-16 Estimated Income Information for the Virgil C. Summer Nuclear Station**  
 2 **Socioeconomic Region of Influence, 2018–2022, 5-Year Estimates**

Parameter	Lexington County	Richland County	Newberry County	Fairfield County	South Carolina
Median household income (dollars) <sup>(a)</sup>	71,280	59,850	56,706	44,521	63,623
Per capita income (dollars) <sup>(a)</sup>	37,209	35,720	32,251	29,269	36,072
Families living below the poverty level (percent)	8.8%	11.5%	10.6%	16.4%	10.2%
People living below the poverty level (percent)	11.6%	16.8%	15.5%	18.7%	14.4%

(a) In 2022 inflation-adjusted U.S. dollars.  
 Source: USCB 2022-TN10423.

3 **3.10.3 Demographic Characteristics**

4 According to the 2020 Census, an estimated 177,057 people lived within 20 mi (32 km) radius of  
 5 V.C. Summer, which equates to a population density of 141 persons per square mile  
 6 (persons/mi<sup>2</sup>) (Dominion 2023-TN10387). This amount translates to a Category 4, “Least  
 7 sparse” population density using the LR GEIS (NRC 2024-TN10161) measure of sparseness,  
 8 which is defined as “greater than or equal to 120 persons per square mile within 20 mi [32 km].”  
 9 An estimated 1,245,777 people live within a 50 mi (80 km) radius of the V.C. Summer site,  
 10 which equates to a population density of 159 persons/mi<sup>2</sup> (Dominion 2023-TN10387). This  
 11 translates to a Category 4 proximity index. Therefore, V.C. Summer is in a “high” population  
 12 area based on the LR GEIS sparseness and proximity matrix (NRC 2024-TN10161).

13 Table 3-17 below shows population projections and percent growth from 2000 to 2070 for the  
 14 four counties in the V.C. Summer Socioeconomic ROI. During the last two decades, the four-  
 15 county ROI increased in population, while the population in Fairfield County declined by  
 16 14.4 percent during 2010–2020. Based on population projections, the populations in Lexington  
 17 County, Richland County and Newberry County are expected to continue to increase through  
 18 2070 if current rates of fertility, mortality, and migration remain unchanged, while the population  
 19 in Fairfield County is expected to decline significantly.

20 **Table 3-17 Population and Percent Growth in Virgil C. Summer Nuclear Station’s**  
 21 **Socioeconomic Region of Influence**

Metric	Year	Lexington County Population	Lexington County Percent Change	Richland County Population	Richland County Percent Change	Newberry County Population	Newberry County Percent Change	Fairfield County Population	Fairfield County Percent Change	ROI Population	ROI Percent Change
Recorded	2000	216,014	-	320,677	-	36,108	-	23,454	-	596,253	-
Recorded	2010	262,391	17.7%	384,504	19.9%	37,508	3.9%	23,956	2.1%	708,359	18.8%
Recorded	2020	293,991	12.0%	416,147	8.2%	37,719	0.6%	20,948	-14.4%	768,805	8.5%
Projected	2030	316,455	7.6%	431,616	3.7%	37,110	-1.6%	16,818	-24.6%	801,999	4.3%
Projected	2040	355,444	12.3%	479,351	11.1%	37,916	2.2%	15,565	-8.1%	888,276	10.8%
Projected	2050	388,736	9.4%	515,797	7.6%	38,238	0.8%	13,273	-17.3%	956,044	7.6%
Projected	2060	422,028	8.6%	552,243	7.1%	38,559	0.8%	10,981	-20.9%	1,023,811	7.1%
Projected	2070	455,320	7.9%	588,689	6.6%	38,881	0.8%	8,690	-26.4%	1,091,580	6.6%

ROI = region of influence.  
 Sources: USCB 2000-TN10464, 2010 data from USCB 2010-TN10565, USCB 2020-TN10465; SCRFAO 2022-TN10466; 2050–2070 projected data from NRC staff estimates.



1 The 2020 Census demographic profile of the V.C. Summer socioeconomic ROI population is  
 2 presented in Table 3-18 below. According to the 2020 Census, minorities (race and ethnicity  
 3 combined) comprised approximately 46 percent of the total population for the socioeconomic  
 4 ROI. The largest minority population in the socioeconomic ROI were Black or African-American  
 5 population (32.8 percent of the total population; 70.8 percent of the total minority population).  
 6 According to both the USCB’s 2020 Census and 2010 Census (USCB 2010-TN10565), since  
 7 2010, minority populations in the four-county ROI were estimated to have increased by  
 8 approximately 55,811 persons, and now compose 46 percent of the population (see Table 3-18  
 9 below). The largest changes occurred in the population of people who identify themselves as  
 10 two or more races, or Hispanic/Latino; these populations grew by more than 17,483 and  
 11 15,390 persons, respectively, since 2010.

12 **Table 3-18 Demographic Profile of the Population in the Virgil C. Summer Nuclear**  
 13 **Station’s Socioeconomic Region of Influence, 2020**

Demographic Parameter	Lexington County	Richland County	Newberry County	Fairfield county	Region of Influence
<b>Total Population</b>	293,991	416,147	37,719	20,948	768,805
Percent White race	71.0	41.5	60.0	40.6	53.7
Percent Black or African-American race	14.4	45.2	27.5	53.5	32.8
Percent American Indian and Alaska Native race	0.3	0.2	0.3	0.3	0.3
Percent Asian race	2.3	2.7	0.4	0.5	2.4
Percent Native Hawaiian and other Pacific Islander race	0.1	0.1	0.0	0.0	0.1
Percent some other race	0.4	0.4	0.2	0.3	0.4
Percent two or more races	4.1	3.5	2.9	2.8	3.7
Hispanic, Latino, or Spanish Ethnicity of any race (total population)	21,797	26,095	3,305	423	51,620
Percent Hispanic, Latino, or Spanish Ethnicity of any race of total population	7.4	6.3	8.8	2.0	6.7
Total minority	85,137	243,503	15,084	12,445	356,169
Percent of total population	29.0	58.5	40.0	59.4	46.3

Source: USCB 2020-TN10465.

14 **3.10.3.1 Transient Population**

15 Fairfield, Lexington, Newberry, and Richland counties can experience seasonal transient  
 16 population growth as a result of local tourism, recreational activities, or college and university  
 17 attendance. For instance, in the four-county socioeconomic ROI, there are numerous State  
 18 parks with campgrounds, national forests, and national parks, which draw visitors to the region  
 19 throughout the year (Dominion 2023-TN10387). A transient population may create a demand for  
 20 temporary housing and services in the area. Based on the Census Bureau’s 2018–2022  
 21 American Community Survey 5-Year Estimates (USCB 2022-TN10467), 5,307 seasonal  
 22 housing units are located in the four-county socioeconomic ROI.

23 **3.10.3.2 Migrant Farm Workers**

24 Migrant farm workers are individuals whose employment requires travel to harvest agricultural  
 25 crops. These workers may or may not have a permanent residence in another area, and some

1 may follow the harvesting of crops, particularly fruit and vegetables, throughout rural areas of  
 2 the United States. Migrant workers may also be members of minority or low-income populations.

3 Since 2002, the Census of Agriculture reports the number of farms hiring migrant workers,  
 4 which are defined as a farm worker whose employment required travel that prevented the  
 5 worker from returning to their permanent place of residence the same day (USDA 2022-  
 6 TN10552). The Census of Agriculture is conducted every 5 years and results in a  
 7 comprehensive compilation of agricultural production data for every county in the Nation.

8 Information about both migrant and temporary farm labor (i.e., working fewer than 150 days)  
 9 can be found in the 2022 Census of Agriculture. Table 3-19 below presents information on  
 10 migrant and temporary farm labor in Fairfield, Lexington, Newberry, and Richland counties.  
 11 According to the 2022 Census of Agriculture, 1,850 farm workers were hired to work for fewer  
 12 than 150 days and were employed on 595 farms in the four-county socioeconomic ROI.  
 13 However, only 32 farms in the socioeconomic ROI reported hiring migrant workers.

14 **Table 3-19 Migrant Farm Workers and Temporary Farm Labor in the Virgil C. Summer**  
 15 **Nuclear Station’s Socioeconomic Region of Influence, 2022**

County	Number of Farms with Hired Farm Labor <sup>(a)</sup>	Number of Farms Hiring Workers for Less Than 150 days <sup>(a)</sup>	Number of Farm Workers Working for Less Than 150 days <sup>(a)</sup>	Number of Farms Reporting Migrant Farm Labor <sup>(a)</sup>
Total	751	595	1,850	32
Fairfield	87	81	138	2
Lexington	347	271	810	12
Newberry	166	117	266	N/A
Richland	151	126	636	18

N/A = not available; ROI = region of influence.

(a) Source: National Agricultural Statistics Service: Quick Stats (USDA 2022-TN10552).

16 **3.10.4 Housing and Community Services**

17 This section of the SEIS presents information on housing and local public services, including  
 18 education and water supply as it relates to the V.C. Summer socioeconomic ROI.

19 *3.10.4.1 Housing*

20 Table 3-20 below lists the total number of occupied and vacant housing units, vacancy rates,  
 21 and median values in the four-county socioeconomic ROI. Based on the USCB’s 2018–2022  
 22 American Community Survey 5-Year Estimates, there were 340,797 housing units in the  
 23 socioeconomic ROI, of which 305,221 were occupied. The median values of owner-occupied  
 24 housing units in the socioeconomic ROI range from \$123,200 in Fairfield County to \$201,200 in  
 25 Richland County. The homeowner vacancy rate was approximately 1.3 percent in Fairfield  
 26 County, 0.6 percent in Lexington County, 0.8 percent in Newberry County, and 1.5 percent in  
 27 Richland County (USCB 2022-TN10468).

1 **Table 3-20 Housing in the Virgil C. Summer Nuclear Station’s Region of Influence,**  
 2 **2018–2022**

Housing Characteristic	Fairfield County	Lexington County	Newberry County	Richland County	Region of Influence
Total housing units	10,943	128,830	18,313	182,711	340,797
Occupied housing units	8,795	118,673	15,027	162,726	305,221
Total vacant housing units	2,148	10,157	3,286	19,985	35,576
Percent total vacant	19.6	7.9	17.9	10.9	10.4
Owner-occupied units	6,609	90,689	11,167	97,287	205,752
Median value (dollars)	123,200	197,600	139,200	201,200	193,743 <sup>(a)</sup>
Owner vacancy rate (percent)	1.3	0.6	0.8	1.5	1.1 <sup>(b)</sup>
Renter-occupied units	2,186	27,984	3,860	65,439	99,469
Median rent (dollars/month)	830	1,061	855	1,142	1,101 <sup>(c)</sup>
Rental vacancy rate (percent)	2.9	3.7	4.1	6.1	5.0 <sup>(b)</sup>

(a) Weighted average by owner-occupied units in Fairfield, Lexington, Newberry, and Richland counties.

(b) Weighted average by total housing units in Fairfield, Lexington, Newberry, and Richland counties.

(c) Weighted average by occupied units paying rent in Fairfield, Lexington, Newberry, and Richland counties.

Source: USCB 2022-TN10468.

3 **3.10.4.2 Education**

4 As of the 2023–2024 school year, the four-county socioeconomic ROI includes 13 public school  
 5 districts, which is comprised of 199 schools with 131,404 students, and 9,397 teachers, for a  
 6 student-teacher ratio of 14:1 (NCES 2024-TN10469). Fairfield County Schools is the closest  
 7 school district to the V.C. Summer plant and directly benefits from property tax payments. The  
 8 Fairfield County district consists of 8 schools serving 2,278 K-12 students, all of which qualify for  
 9 free or reduced lunch programs (NCES 2024-TN10469). Across the four-county socioeconomic  
 10 ROI, 66.1 percent of students qualified for free or reduced lunch programs (NCES 2024-  
 11 TN10469) in the 2023–2024 school year.

12 **3.10.4.3 Public Water Supply**

13 Six public water systems supply the Fairfield County residents who do not have individual onsite  
 14 wells. The water is sourced 90 percent from various surface water resources and 10 percent  
 15 from groundwater (Dominion 2023-TN10387). Based on the Fairfield County Comprehensive  
 16 Plan (2021-TN10470: pp. 84–85), the public water systems appear to be utilizing just over  
 17 40 percent of their developed capacity and have addressed foreseeable future water supply  
 18 needs.

19 Fairfield County is in the process of developing additional wastewater resources as the county is  
 20 nearing design capacity on current systems (Dominion 2023-TN10387). Future growth in the  
 21 county will be limited by the rate at which additional wastewater resources can be brought  
 22 online (Fairfield County 2021-TN10470: pp.93–94).

23 V.C. Summer’s domestic water supply is from the Monticello Reservoir. V.C. Summer treats  
 24 sanitary wastewater at an onsite sanitary wastewater treatment facility (Dominion 2023-  
 25 TN10387).

1 **3.10.5 Tax Revenues**

2 Dominion provides substantial annual property tax payments to Fairfield County, which allocates  
 3 funds for county services on behalf of the V.C. Summer plant. Dominion also provides minor  
 4 annual funding (less than \$500,000) to South Carolina Emergency Management Division and  
 5 SCDHEC for emergency planning activities within a 10 mi (16 km) radius of the plant (Dominion  
 6 2023-TN10387).

7 Table 3-21 presents total annual property tax payments to Fairfield County and its tax  
 8 jurisdictions for the years 2018 through 2023, as well as an evaluation of the V.C. Summer  
 9 property tax as a percent of Fairfield County’s total revenues (Dominion 2023-TN10387,  
 10 Dominion 2024-TN10391; Fairfield County 2024-TN10424). The V.C. Summer total annual  
 11 property tax payment to Fairfield County in 2023 was \$12.7 million, representing 46.5 percent of  
 12 total county tax revenue. Dominion’s annual property tax payments for V.C. Summer have  
 13 remained consistent over the last 5 years, representing well over 40 percent of Fairfield County  
 14 total tax revenue. Currently, no substantial future tax payment changes are expected.

15 **Table 3-21 Total Property Tax Payments by Virgil C. Summer Nuclear Station,**  
 16 **2018–2023**

Parameter	2018	2019	2020	2021	2022	2023
Fairfield County Revenues	26,628,308	28,475,796	26,897,144	27,088,507	25,325,000	27,308,000
Virgil C. Summer property tax payment	10,925,000	12,330,000	12,019,136	12,652,074	11,938,930	12,693,913
Virgil C. Summer proportion of total county revenue	41.0%	43.3%	44.7%	46.7%	47.1%	46.5%

Sources: Dominion 2023-TN10387, Dominion 2024-TN10391; Fairfield County 2024-TN10424.

17 **3.10.6 Local Transportation**

18 Transportation in the region surrounding V.C. Summer includes a rural and urbanized road  
 19 network, as well as rail and air travel. SC 215 runs north-south along the eastern shore of the  
 20 Monticello Reservoir, running south to Columbia, South Carolina, and north to Spartanburg,  
 21 South Carolina, and providing plant access from the east. South Carolina Highway 213 (SC  
 22 213), which runs southwest-northeast to the south of the plant and intersects with SC 215  
 23 southeast of the plant, provides access from the west and from Winnsboro, South Carolina, on  
 24 the east. South Carolina Highway 176 (SC 176) traverses the region northwest to southeast,  
 25 roughly parallel to Interstate 26, both providing commuter access to the plant from the west  
 26 (Dominion 2023-TN10387). The small, unincorporated community of Jenkinsville, South  
 27 Carolina, lies immediately southeast of the site along SC 215 near its junction with SC 213.

28 Table 3-22 below shows the average annual daily traffic volumes for the main plant access  
 29 routes. Traffic counts illustrate the construction period for now terminated Unit 2 and 3 project,  
 30 which occurred between 2011 and 2021 (SCDOT 2012-TN10566, SCDOT 2017-TN10567,  
 31 SCDOT 2022-TN10568, SCDOT 2024-TN10569). Current traffic levels have returned to similar  
 32 levels observed during the pre-Unit 2 and Unit 3 construction period.

1 **Table 3-22 Total Average Annual Daily Traffic Counts Near Key Access Points of**  
 2 **Virgil C. Summer Nuclear Station**

Roadway and Location	Annual Average Daily Traffic Volume Estimates for 2011	Annual Average Daily Traffic Volume Estimates for 2016	Annual Average Daily Traffic Volume Estimates for 2021	Annual Average Daily Traffic Volume Estimates for 2023
SC 213, Parr Rd (Station 140)	3,200	5,200	6,000	2,800
SC 213, Monticello Rd (Station 141)	950	1,650	1,150	1,600
SC 215, Rock Hill (Station 145)	1,750	3,500	4,300	2,300

Source: SCDOT 2012-TN10566, SCDOT 2017-TN10567, SCDOT 2022-TN10568, SCDOT 2024-TN10569.  
 SC 213 = South Carolina Highway 213; SC 215 = South Carolina Highway 215.

3 While Fairfield County has planned some transportation projects aimed at diversifying modes of  
 4 transport within the county road system, none of these projects are anticipated to affect  
 5 V.C. Summer site access. Current traffic levels in the vicinity of the site are well below highway  
 6 capacities for two lane highways in South Carolina, and Level of Service values are estimated to  
 7 range between “A” to “C” within Fairfield County (Dominion 2023-TN10387).

8 **3.10.7 Proposed Action**

9 As documented in the 2024 LR GEIS (NRC 2024-TN10161) and cited in Table 3-1 for generic  
 10 socioeconomic issues, the impacts of nuclear power plant SLR and continued operations would  
 11 be SMALL for Category 1 issues applicable to V.C. Summer.

12 Socioeconomic effects of ongoing reactor operations at V.C. Summer have become well-  
 13 established as regional socioeconomic conditions have adjusted to the presence of the nuclear  
 14 power plant. Changes in employment and tax revenue could affect the availability of community  
 15 services and housing, as well as traffic on roads near the nuclear power plant.

16 Dominion indicated in its ER that there are no SLR-related refurbishment activities, and that  
 17 they have no plans to add additional permanent employees to support plant operations during  
 18 the proposed SLR term (Dominion 2023-TN10387). There are also no plans to add additional  
 19 permanent operations staff to support surveillance, monitoring, inspections, testing, trending,  
 20 and recordkeeping activities during the proposed SLR term (Dominion 2023-TN10387).  
 21 Consequently, people living near V.C. Summer would not experience any changes in  
 22 socioeconomic conditions during the SLR term beyond what is currently being experienced.

23 The NRC staff’s review did not identify any new and significant information that would change  
 24 the conclusion in the 2024 LR GEIS. Thus, as concluded in the 2024 LR GEIS, for these  
 25 Category 1 (generic) issues, the impacts of continued operation of V.C. Summer on  
 26 socioeconomic issues would be SMALL.

27 **3.10.8 No-Action Alternative**

28 *3.10.8.1 Socioeconomics*

29 Under the no-action alternative, the NRC would not issue a subsequent renewed operating  
 30 license, and V.C. Summer would shut down on or before the expiration of the current operating

1 license. This would have a substantial impact on socioeconomic conditions in the counties and  
2 communities near V.C. Summer—especially Fairfield County. The loss of jobs, income, and tax  
3 revenue would have an immediate adverse socioeconomic impact. As jobs are eliminated,  
4 some, but not all of the approximately 989 workers could leave the region. Income from buying  
5 and selling goods and services that are needed to maintain the nuclear power plant would also  
6 be reduced. In addition, loss of tax revenue could affect the availability of public services.

7 If V.C. Summer workers and their families move out of the region, increased vacancies and  
8 reduced demand for housing would likely cause housing prices to fall. The greatest  
9 socioeconomic impact would be experienced in Fairfield County from the loss of property tax  
10 revenue, and in Newberry County from the loss of relatively well-paying jobs in a rural county.  
11 However, the loss of jobs, income, and tax revenue may not be as noticeable in larger, more  
12 urban communities due to the larger and more diversified economy found in greater Columbia.  
13 Therefore, depending on the jurisdiction, socioeconomic impacts of not issuing a subsequent  
14 renewed operating license and terminating reactor operations at V.C. Summer (no-action  
15 alternative) could range from MODERATE to LARGE.

#### 16 3.10.8.2 *Transportation*

17 Traffic volume on roads near V.C. Summer may be noticeably reduced after the termination of  
18 reactor operations. Any reduction in traffic volume would coincide with plant workforce  
19 reductions. Similarly, truck deliveries and shipments would also be reduced until active  
20 decommissioning. Therefore, due to the time and steps required to prepare the nuclear power  
21 plant for decommissioning, traffic-related transportation impacts would be SMALL.

### 22 **3.10.9 Replacement Power Alternatives: Common Impacts**

23 Workforce requirements for replacement power alternatives were evaluated to measure their  
24 possible effects on current socioeconomic and transportation conditions. Table 3-23 below  
25 summarizes socioeconomic and transportation impacts of replacement power alternatives. The  
26 following provides a discussion of the common socioeconomic and transportation impacts  
27 during construction and operations of replacement power-generating facilities.

#### 28 3.10.9.1 *Socioeconomics*

29 Socioeconomic impacts are defined in terms of changes in the social and economic conditions  
30 of a region. For example, the creation of jobs and the purchase of goods and services during  
31 the construction and operation of a replacement power plant could affect regional employment,  
32 income, and tax revenue. For each alternative, two types of jobs would be created:  
33 (1) construction jobs, which are transient, short in duration, and less likely to have a long-term  
34 socioeconomic impact, and (2) operations jobs, which have the greater potential for permanent,  
35 long-term socioeconomic impacts.

36 While the selection of a replacement power alternative could create opportunities for  
37 employment and income and generate tax revenue in the local economy, employment, income,  
38 and tax revenue would be greatly reduced or eliminated in communities near V.C. Summer.  
39 These impacts on the communities near V.C. Summer are described in the Section 3.10.8 of  
40 this SEIS. The following provides a discussion of the common socioeconomic and transportation  
41 impacts on the communities near replacement power plants during the construction and  
42 operations of these alternatives.

1 **Table 3-23 Socioeconomic and Transportation Impacts of Replacement Power**  
 2 **Alternatives at Virgil C. Summer Nuclear Station**

Alternative	Resource Requirements	Impacts	Discussion
Natural Gas	Construction: peak 1,200 workers for several months	MODERATE to LARGE <sup>(a)</sup>	Some operations workers could transfer from V.C. Summer. Increased demand for temporary housing and increased traffic volume impacts on local roads during peak construction activity.
Natural Gas	Operations: 150 workers	SMALL to MODERATE <sup>(a)</sup>	Some operations workers could transfer from V.C. Summer.
New Nuclear	Construction: peak 3,300 workers for several months;	MODERATE to LARGE	Site preparation for Units 2 and 3 may reduce construction time, but large workforce would increase demand for temporary housing and increased traffic volumes on local roads during peak construction activity.
New Nuclear	Operations: 500 workers	SMALL to MODERATE	Slightly smaller operations work force than V.C. Summer. Similar traffic volume impacts during shift changes.
Natural Gas and Solar Combination	Construction: peak 800 (NGCC), 500 (Solar) workers for several months	SMALL to MODERATE	Site preparation for Units 2 and 3 may reduce construction time. Increased demand for temporary housing and increased traffic volumes on local roads during peak construction activity.
Natural Gas and Solar Combination	Operations: 100 (NGCC), 60 (Solar)	SMALL to MODERATE	Fewer operations workers than V.C. Summer. Smaller traffic volume impacts during shift changes.
New Nuclear and Solar Combination	Construction: peak 3,300 workers for several months (Nuclear); 500 (Solar)	MODERATE to LARGE	Site preparation for Units 2 and 3 may reduce construction time, but large workforce would increase demand for temporary housing and increased traffic volumes on local roads during peak construction activity.
New Nuclear and Solar Combination	Operations: 500 workers (Nuclear); 60 (Solar)	SMALL to MODERATE	Similar number of operations workers as V.C. Summer. No noticeable difference in traffic volume impacts during shift changes.

NGCC = natural gas-fired combined-cycle; V.C. Summer = Virgil C. Summer Nuclear Station.

(a) Assuming that all combined-cycle combustion turbines are constructed or installed at the same time.

Sources: NRC 2019-TN6824, NRC 2019-TN6136; DOE 2011-TN8387; BLM 2019-TN8386; Tegen 2016-TN8826.

3 **Construction**

4 During construction of a replacement power alternatives facility, the relative economic effect of  
 5 an influx of workers on the local economy and tax revenue would vary and depend on the size  
 6 of the workforce and construction completion time. The greatest impact would occur in the  
 7 communities where the majority of construction workers would reside and spend their income.  
 8 As a result, some communities could experience a short-term economic boom during  
 9 construction from increased tax revenue and income generated by expenditures for goods and  
 10 services and increased demand for temporary (rental) housing. After construction, local  
 11 communities would likely experience a return to preconstruction economic conditions.

1 Operation

2 Before the commencement of startup and operations at a replacement power alternatives  
3 facility, local communities would see an influx of operations workers and their families and  
4 increased demand for permanent housing and public services. These communities would also  
5 experience the economic benefits from increased income and tax revenue generated by the  
6 purchase of goods and services needed to operate a new power plant. Consequently, when  
7 compared to construction, power plant operations would have a greater potential for effecting  
8 permanent, long-term socioeconomic impacts on the region.

9 *3.10.9.2 Transportation*

10 Transportation impacts are defined in terms of changes in level-of-service conditions on local  
11 roads near the replacement power plant. Additional vehicles during construction and operations  
12 could lead to traffic congestion, level-of-service impacts, and delays at intersections.

13 Construction

14 Transportation impacts would consist of commuting workers and truck deliveries of equipment  
15 and material to the construction site. Traffic volumes would increase during shift changes. In  
16 addition, trucks would deliver equipment and material to the construction site and remove waste  
17 material, thus increasing the amount of traffic on local roads. The increase in traffic volumes  
18 could result in levels of service impacts and delays at intersections during certain hours of the  
19 day. In some instances, construction material could also be delivered and removed by rail.

20 Operation

21 Traffic-related transportation impacts on local roads would be greatly reduced after construction  
22 has been completed. Transportation impacts would include daily commuting by the operations  
23 workforce and deliveries of material, and the removal of commercial waste material.

24 **3.11 Human Health**

25 V.C. Summer is both an industrial facility and a nuclear power plant. Similar to any industrial  
26 facility or nuclear power plant, the operation of V.C. Summer during the SLR period would  
27 produce various human health risks for workers and members of the public. This section  
28 describes the human health risks resulting from the operation of V.C. Summer, including from  
29 radiological exposure, chemical hazards, microbiological hazards, electromagnetic fields, and  
30 other hazards. The description of these risks is followed by the NRC staff's analysis of the  
31 potential impacts on human health from the proposed action (SLR) and alternatives to the  
32 proposed action.

33 **3.11.1 Radiological Exposure and Risk**

34 Operation of a nuclear power plant involves the use of nuclear fuel to generate electricity.  
35 Through the fission process, the nuclear reactor splits uranium atoms, resulting very generally in  
36 (1) the production of heat, which is then used to produce steam to drive the nuclear power  
37 plant's turbines and generate electricity; and (2) the creation of radioactive byproducts. As  
38 required by NRC regulations specified in 10 CFR 20.1101, "Radiation protection programs,"  
39 (TN283) Dominion designed a radiation protection program to protect onsite personnel  
40 (including employees and contractor employees), visitors, and offsite members of the public



1 from radiation and radioactive material at V.C. Summer. The V.C. Summer radiation protection  
2 program is extensive and includes, but is not limited to, the following:

- 3 • organization and administration (e.g., a radiation protection manager who is responsible for  
4 the program and ensures trained and qualified workers for the program)
- 5 • implementing procedures
- 6 • an ALARA program to minimize radiation dose to workers and members of the public
- 7 • dosimetry program (i.e., measure radiation dose to nuclear power plant workers)
- 8 • radiological controls (e.g., protective clothing, shielding, filters, respiratory equipment, and  
9 individual work permits with specific radiological requirements)
- 10 • radiation area entry and exit controls (e.g., locked or barricaded doors, interlocks, local and  
11 remote alarms, personnel contamination monitoring stations)
- 12 • posting of radiation hazards (i.e., signs and notices alerting nuclear power plant personnel of  
13 potential hazards)
- 14 • recordkeeping and reporting (e.g., documentation of worker dose and radiation survey data)
- 15 • radiation safety training (e.g., classroom training and use of mockups to simulate complex  
16 work assignments)
- 17 • radioactive effluent monitoring management (i.e., controlling and monitoring radioactive  
18 liquid and gaseous effluents released into the environment)
- 19 • radioactive environmental monitoring (e.g., sampling and analysis of environmental media,  
20 such as air, water, groundwater, milk, food products, and sediment to measure the levels of  
21 radiation emitted into the environment that may impact human health)
- 22 • radiological waste management (i.e., controlling, monitoring, processing, and disposing of  
23 radioactive solid waste)

24 To evaluate radiation exposure to V.C. Summer personnel, the NRC staff reviewed the data  
25 contained in NUREG-0713, Volume 43, *Occupational Radiation Exposure at Commercial*  
26 *Nuclear Power Reactors and other Facilities 2021: Fifty-Fourth Annual Report (2024-TN9915)*.  
27 The Fifty-Fourth Annual Report was the most recent annual report available at the time of this  
28 environmental review. It summarizes the occupational exposure data in the NRC's Radiation  
29 Exposure Information and Reporting System database through 2021. Nuclear power plants are  
30 required by 10 CFR 20.2206, "Reports of individual monitoring," to report their occupational  
31 exposure data to the NRC annually (TN283).

32 NUREG-0713 contains a calculation of a 3-year average collective dose per reactor for workers  
33 at all nuclear power reactors licensed by the NRC. The 3-year average collective dose is one of  
34 the metrics that the NRC uses in the Reactor Oversight Process to evaluate the applicant's  
35 ALARA program. Collective dose is the sum of the individual doses received by workers at a  
36 facility licensed to use radioactive material during a 1-year time period. There are no NRC or  
37 EPA standards for collective dose. Based on the data for operating pressurized water reactors  
38 like the unit at V.C. Summer, the average annual collective dose per reactor year was 30 person  
39 roentgen equivalent man (rem) (NRC 2024-TN9915). In comparison, V.C. Summer had a  
40 reported annual collective dose per reactor year of 21 person-rem. Section 3.13.1 of this SEIS  
41 discusses offsite dose to members of the public.

1 **3.11.2 Chemical Hazards**

2 The Federal and State environmental agencies regulate the use, storage, and discharge of  
3 chemicals, biocides, and sanitary wastes. Such environmental agencies also regulate how  
4 facilities like V.C. Summer manage minor chemical spills. Chemical and hazardous wastes can  
5 potentially affect workers, members of the public, and the environment.

6 At V.C. Summer, chemical effects could result from discharge of waste, heavy metal leaching,  
7 the use and disposal of chemicals, and chemical spills. Workers may encounter chemicals when  
8 adjusting coolant systems, applying biocides, during maintenance activities on equipment  
9 containing hazardous chemicals, and when solvents are used for cleaning (Dominion 2023-  
10 TN10387).

11 Dominion currently controls the use, storage, and discharge of chemicals, biocides, and sanitary  
12 wastes at V.C. Summer in accordance with its NPDES and other permits, discussed in  
13 Section 3.5.1.3 of this SEIS, through the site's industrial safety program, waste management  
14 procedures, and hazardous waste contingency plan (2023-TN10387). These nuclear power  
15 plant procedures, plans, and processes are designed to prevent and minimize the potential for a  
16 chemical or hazardous waste release and, in the event of such a release, minimize the impact  
17 on workers, members of the public, and the environment.

18 There were three inadvertent nonradioactive releases due to V.C. Summer operations from  
19 2017 through 2021 (Dominion 2023-TN10387). As discussed in ER Section E3.6.4.2.2, in  
20 June 2020 there was a transmission fluid spill of 1–2 ounces (oz) (29.6–59.1 milliliter [mL])  
21 because of a hydraulic hose leak during equipment testing that was released to the Monticello  
22 Reservoir (Dominion 2023-TN10387). This spill was reported to the SCDHEC. This was a non-  
23 emergency notification, and the spill did not violate any NRC regulations nor did it exceed any  
24 reporting criteria. In September 2021, there was a lift station overflow due to a broken discharge  
25 pipe. The overflow was contained in the valve vault, basin gravel, and the nearby concrete  
26 surface. None of the overflow reached any storm drains or waters of the state. The release did  
27 not exceed any NRC regulations or reporting criteria and, although originally reported to the  
28 SCDHEC, the event notification was retracted once it was determined that the lift station  
29 overflow did not exceed any Federal, State, or local reporting criteria or violate any permits. In  
30 November 2021, the V.C. Summer reactor was manually tripped due to a main transformer fault  
31 that released mineral oil. The oil was mixed with a large amount of water from the transformer's  
32 suppression system, which surpassed the capacity of the plant's oil/water separator. The  
33 separator sump transferred the mixture to internal NPDES Outfall 06B, which drains to Outfall  
34 014 and an oil sheen was observed at Outfall 014. Less than 50 gallons (gal) (189.2 liters [L]) of  
35 mineral oil was estimated to have entered the Monticello Reservoir. The oil was contained with  
36 booms and cleaned up. The EPA National Response Center and SCDHEC were notified. From  
37 the period of January 2022 until April 2024, Dominion confirmed that no reportable inadvertent  
38 releases or spills of nonradioactive contaminants occurred (2024-TN10391).

39 **3.11.3 Microbiological Hazards**

40 Microbiological hazards occur when workers or members of the public come into contact with  
41 disease-causing microorganisms, also known as etiological agents. Thermal effluents associated  
42 with nuclear power plants that discharge to a reservoir, such as V.C. Summer, have the potential  
43 to promote the growth of certain thermophilic microorganisms linked to adverse human health  
44 effects. Microorganisms of particular concern include several types of bacteria and the free-living  
45 amoeba *Naegleria fowleri* (*N. fowleri*). There are optimum growth temperatures for the  
46 microorganisms of concern as further discussed in the 2024 LR GEIS (NRC 2024-TN10161).

1 The public can be exposed to the thermophilic microorganisms during swimming, boating, or  
2 other recreational uses of freshwater. If these organisms are naturally occurring and a nuclear  
3 power plant's thermal effluent enhances their growth, the public could experience an elevated  
4 risk of infection when recreating in the affected waters. Public exposure to *Legionella* spp. from  
5 nuclear power plant operation is generally not a concern because exposure risk is confined to  
6 cooling towers and related components and equipment, which are typically within the protected  
7 area of the site and, therefore, not accessible to the public.

8 Nuclear power plant workers can be exposed to *Legionella* spp. when performing cooling  
9 system maintenance through inhalation of cooling tower vapors because these vapors are often  
10 within the optimum temperature range for *Legionella* spp. growth. Nuclear power plant  
11 personnel at V.C. Summer who are most likely to come into contact with aerosolized  
12 *Legionella* spp. include workers who clean and maintain the condenser tubes. Nuclear power  
13 plant workers can also be exposed to *N. fowleri* during cooling water discharges. V.C. Summer  
14 has an industrial safety program that includes procedures for entry to cooling water systems  
15 where *Legionella* spp. is possible (Dominion 2023-TN10387).

16 As discussed in Section E2.2 of the Dominion ER (2023-TN10387), V.C. Summer uses a once-  
17 through cooling water system that withdraws water from the Monticello Reservoir into its  
18 condensers. After the water cools the condenser, the heated water is transferred to a discharge  
19 bay and then flows back into the Monticello Reservoir via a 1,000 ft (304.8 m) long discharge  
20 canal about 10 ft (3.0 m) below the water surface. The effluent is diluted by the discharge  
21 canal's volume and then further diluted by the large volume of the Monticello Reservoir before  
22 reaching public areas. The Monticello Reservoir is open to the public for boating, swimming, and  
23 fishing but there is a 1 mi (1.6 km) radius exclusion zone surrounding the V.C. Summer site.  
24 While swimming is not restricted in the reservoir, the swimming beach that draws the greatest  
25 number of swimmers is at the north end of the waterbody. V.C. Summer uses a once-through  
26 cooling water system for its condenser circulating cooling but has a mechanical draft cooling  
27 tower for the Turbine Building closed-cooling water system. Condenser maintenance involves  
28 waterbox entry during outages which is covered by the nuclear power plant's confined space  
29 program. The NPDES permit includes effluent limitations and monitoring requirements and the  
30 site has a health and safety program with procedures that implement industrial hygiene  
31 practices to minimize the potential for plant worker exposure.

#### 32 **3.11.4 Electromagnetic Fields**

33 Electromagnetic fields (EMFs) are generated by any electrical equipment. All nuclear power  
34 plants have electrical equipment and power transmission systems associated with them. Power  
35 transmission systems consist of switching stations (or substations) located on the nuclear power  
36 plant site and the transmission lines needed to connect the plant to the regional electrical  
37 distribution grid. Transmission lines operate at a frequency of 60 hertz (Hz) (60 cycles per  
38 second), which is low compared with the frequencies of 55 to 890 megahertz (MHz) for  
39 television transmitters and 1,000 MHz and greater for microwaves.

40 The scope of the evaluation of transmission lines includes only those transmission lines that  
41 connect the plant to the switchyard where electricity is fed into the regional power distribution  
42 system (encompassing those lines that connect the plant to the first substation of the regional  
43 electrical power grid), and power lines that feed the plant from the grid are considered within the  
44 regulatory scope of the license renewal environmental review. Transmission lines in scope for  
45 V.C. Summer are shown in ER Figure E2.2-1 (Dominion 2023-TN10387). As discussed in  
46 Section 2.1.6.5 of this SEIS, the Parr 115 kV transmission corridor continues past the site

1 boundary, but access to the corridor is controlled by Dominion. The 230 kV lines are within the  
2 nuclear power plant site's exclusion area.

3 Electric fields are produced by voltage and their strength increases with increases in voltage. A  
4 magnetic field is produced from the flow of current through wires or electrical devices, and its  
5 strength increases as the current increases. Electric and magnetic fields, collectively referred to  
6 as EMFs, are produced by operating transmission lines.

7 Occupational workers or members of the public near transmission lines may be exposed to the  
8 EMFs produced by the transmission lines. The EMF strength varies in time as the current and  
9 voltage change, so that the frequency of the EMF is the same (e.g., 60 Hz for standard  
10 alternating current, or AC). Electrical fields can be shielded by objects such as trees, buildings,  
11 and vehicles. Magnetic fields, however, penetrate most materials, but their strength decreases  
12 with increasing distance from the source. The EMFs resulting from 60 Hz power transmission  
13 lines fall under the category of non-ionizing radiation. The LR GEIS (NRC 2024-TN10161)  
14 summarizes NRC-accepted studies on the health effects of electromagnetic fields. There are no  
15 Federal standards limiting residential or occupational exposure to EMFs from transmission  
16 power lines in the United States, but some States have set electric field and magnetic field  
17 standards for transmission lines (NIEHS 2002-TN6560). A voluntary occupational standard has  
18 been set for EMFs by the International Commission on Non-Ionizing Radiation Protection (1998-  
19 TN6591). The National Institute of Occupational Safety and Health does not consider EMFs to  
20 be a proven health hazard (1996-TN6766).

### 21 **3.11.5 Other Hazards**

22 This section addresses two additional human health hazards: (1) physical occupational hazards  
23 and (2) occupational electric shock hazards.

24 Nuclear power plants are industrial facilities that have many of the typical occupational hazards  
25 found at any other electric power generation utility. Nuclear power plant workers may perform  
26 electrical work, electric powerline maintenance, repair work and maintenance activities, and  
27 may be exposed to potentially hazardous physical conditions. A physical hazard is an action,  
28 agent or condition that can cause harm upon contact. Physical actions could include slips, trips,  
29 and falls from height. Physical agents could include noise, vibration, and ionizing radiation.  
30 Physical conditions could include high heat, cold, pressure, confined space, or psychosocial  
31 issues, such as work-related stress.

32 The Occupational Safety and Health Administration (OSHA) is responsible for developing and  
33 enforcing workplace safety regulations. Congress created OSHA by enacting the Occupational  
34 Safety and Health Act of 1970, as amended (TN4453), to safeguard the health of workers. With  
35 respect to nuclear power plants, nuclear power plant conditions that result in an occupational  
36 risk, but do not affect the safety of licensed radioactive materials, are under the statutory  
37 authority of OSHA rather than the NRC as set forth in a Memorandum of Understanding (2013-  
38 TN10165) between the NRC and OSHA. Occupational hazards are reduced when workers  
39 adhere to safety standards and use appropriate protective equipment; however, fatalities and  
40 injuries caused by accidents may still occur. Dominion maintains a comprehensive industrial  
41 safety program for its workers in accordance with OSHA regulations (2023-TN10387).

42 Based on its evaluation in the LR GEIS (NRC 2024-TN10161), the NRC has not found electric  
43 shock resulting from direct access to energized conductors or from induced charges in metallic  
44 structures to be a problem at most operating nuclear power plants. Generally, the NRC staff

1 also does not expect electric shock from such sources to be a human health hazard during the  
2 SLR period. However, a plant-specific review is required to determine the significance of the  
3 electric shock potential along the portions of the transmission lines that are within the scope of  
4 this SEIS. Transmission lines that are within the scope of the NRC's SLR environmental review  
5 are limited to: (1) those transmission lines that connect the nuclear power plant to the substation  
6 where electricity is fed into the regional electrical power grid system, and (2) those transmission  
7 lines that supply power to the nuclear power plant from the grid (2024-TN10161).

8 As discussed in Section 2.1.6.5 of this SEIS, the in-scope transmission lines are located within  
9 the site's exclusion area boundary and in a transmission corridor with access controlled by  
10 Dominion. These in-scope lines are in compliance with National Electrical Safety Code  
11 clearances (Dominion 2023-TN10387). Therefore, there is no potential shock hazard to off-site  
12 members of the public from these on-site transmission lines.

### 13 **3.11.6 Proposed Action**

14 As described in the LR GEIS (NRC 2024-TN10161) and as cited in Table 3-1, for generic issues  
15 related to human health, the impacts of a nuclear power plant LR and continued operations  
16 would be SMALL. The NRC staff's review did not identify any new and significant information  
17 that would change the conclusion in the LR GEIS. Thus, as concluded in the LR GEIS, for these  
18 Category 1 (generic) issues, the impacts of continued operation of V.C. Summer on human  
19 health would be SMALL.

20 Table 3-2 identifies one uncategorized issue (EMFs) and two plant-specific (Category 2) issues  
21 (i.e., microbiological hazards to the public, and electric shock hazards) related to human health  
22 applicable to V.C. Summer SLR. These issues are analyzed below.

#### 23 *3.11.6.1 Microbiological Hazards to the Public*

24 In the LR GEIS (NRC 2024-TN10161), the NRC staff determined that effect of thermophilic  
25 microorganisms on the public for nuclear power plants that use cooling ponds, lakes, canals or  
26 that discharge to publicly accessible surface waters is a Category 2 issue that requires plant-  
27 specific evaluation during each LR review.

28 The thermophilic microorganism *N. fowleri* can pose public health concerns in recreational use  
29 waters when these organisms are present in high enough concentrations to cause infection.  
30 Dominion requested that the SCDHEC provide information on any studies the agency might  
31 have conducted concerning thermophilic microorganisms in the Monticello Reservoir and any  
32 concerns the agency might have relative to these organisms. SCDHEC's response indicated  
33 that public health hazards from thermophilic organisms are largely theoretical and do not  
34 represent a significant health threat to offsite users of Monticello Reservoir's waters. SCDHEC  
35 also notes in their reply that cooling water from the facility has been discharged into the  
36 reservoir for the last 38 years, and no outbreaks of infections from *N. fowleri* or *P. aeruginosa*  
37 were associated with recreational activities in the reservoir (Dominion 2023-TN10387). During  
38 the proposed SLR term, the public health risk from *N. fowleri* remains extremely low and the  
39 proposed action would not result in operational changes that would affect thermal effluent  
40 temperature or otherwise create favorable conditions. The NRC staff concludes that the impacts  
41 of thermophilic microorganisms on the public due to continued nuclear power plant operations at  
42 V.C. Summer during the SLR term would be SMALL because thermal effluent discharges from  
43 V.C. Summer during the proposed SLR term would not contribute to the proliferation of  
44 microorganisms of concern in the Monticello Reservoir.

1 3.11.6.2 *Effects of Electromagnetic Fields*

2 The LR GEIS (NRC 2024-TN10161) does not designate the chronic effects of 60 Hz EMFs from  
3 powerlines as either a Category 1 or 2 issue. Until a scientific consensus is reached about the  
4 health implications of EMFs, the NRC will not include them as Category 1 or 2 issues.

5 The potential for chronic effects from these EMFs continues to be studied and is not known at  
6 this time. The NIEHS report (1999-TN78) contains the following conclusion:

7 The NIEHS concludes that ELF-EMF (extremely low frequency electromagnetic  
8 field) exposure cannot be recognized as entirely safe because of weak scientific  
9 evidence that exposure may pose a leukemia hazard. In our opinion, this finding  
10 is insufficient to warrant aggressive regulatory concern. However, because  
11 virtually everyone in the United States uses electricity and therefore is routinely  
12 exposed to ELF-EMF, passive regulatory action is warranted such as continued  
13 emphasis on educating both the public and the regulated community on means  
14 aimed at reducing exposures. The NIEHS does not believe that other cancers or  
15 noncancer health outcomes provide sufficient evidence of a risk to currently  
16 warrant concern.

17 This statement was not sufficient to cause the NRC to change its position with respect to the  
18 chronic effects of EMFs. The NRC staff considers the LR GEIS finding of, "Uncategorized  
19 (Uncertain impact)" still appropriate and will continue to follow developments on this issue.

20 3.11.6.3 *Electric Shock Hazards*

21 Based on the LR GEIS (NRC 2024-TN10161), the NRC staff found that electric shock resulting  
22 from direct access to energized conductors or from induced charges in metallic structures has  
23 not been identified as a problem at most operating nuclear power plants and generally is not  
24 expected to be a problem during the SLR term. However, a plant-specific review is required to  
25 determine the significance of the electric shock potential along the portions of the transmission  
26 lines that are within the scope of the V.C. Summer SLR review.

27 As discussed in Section 2.1.6.5 and Section 3.11.5 of this SEIS, the Parr 115 kV transmission  
28 corridor continues beyond the site boundary of the V.C. Summer plant site, but corridor access  
29 is controlled by Dominion; therefore, although the corridor is outside the site boundary, it is not  
30 accessible to the public (Dominion 2024-TN10391). The 230 kV lines are within the site's  
31 exclusion area. Therefore, there are no potential impacts on members of the public resulting  
32 from such transmission lines. There are two transmission corridors onsite containing 115 kV and  
33 230 kV overhead transmission lines with the potential for electric shock to workers through  
34 induced currents. To address this occupational hazard, Dominion adheres to the National  
35 Electrical Safety Code for clearances and OSHA compliance requirements for shock hazard  
36 avoidance (2023-TN10387). As discussed in Section 3.11.5 of this SEIS, V.C. Summer  
37 maintains an occupational safety program in accordance with OSHA regulations for its workers,  
38 which includes protection from acute electric shock. Therefore, the NRC staff concludes that the  
39 potential impacts from acute electric shock during the SLR term would be SMALL.

40 3.11.6.4 *Postulated Accidents*

41 The 2024 LR GEIS evaluates the following two classes of postulated accidents as they relate to  
42 license renewal:

- 1 • Design-Basis Accidents: Postulated accidents that a nuclear facility must be designed and  
2 built to withstand without loss to the systems, structures, and components necessary to  
3 ensure public health and safety.
- 4 • Severe Accidents: Postulated accidents that are more severe than design-basis accidents  
5 because they could result in substantial damage to the reactor core.

6 As shown in Table 3-1 of this SEIS, the LR GEIS (NRC 2024-TN10161) addresses design-basis  
7 accidents and severe accidents as Category 1 issues and concludes that the environmental  
8 impacts of design-basis accidents and severe accidents are of SMALL significance for all  
9 nuclear power plants.

10 The NRC staff did not identify any new and significant information related to design-basis  
11 accidents during its independent review of Dominion’s ER (2023-TN10387), through the scoping process, during  
12 the NRC staff’s audit of the V.C. Summer ER (2023-TN10387), or in its evaluation of other  
13 available information (generic and plant-specific). Therefore, the NRC staff concludes there is  
14 no new and significant information on the environmental impacts of design-basis accidents at  
15 V.C. Summer during the SLR period that are not already discussed in the SEIS for initial license  
16 renewal (NRC 2004-TN7262) or generically evaluated for all nuclear power plants in the  
17 2024 LR GEIS. Therefore, the NRC staff concludes that the potential impacts from design-basis  
18 accidents during the SLR term would be SMALL.

19 Additionally, as shown in Table 3-1 of this SEIS, the LR GEIS (NRC 2024-TN10161) also  
20 addressed severe accidents as a Category 1 issue and concluded that the environmental  
21 impacts from severe accidents are SMALL for all nuclear power plants. V.C. Summer was  
22 specifically included in the plants evaluated in the 2024 LR GEIS. V.C. Summer values (i.e.,  
23 population dose risk, core damage frequency [CDF] values) were presented in 2024 LR GEIS  
24 Tables E.3-1, E.3-6, E.3-8, E.3-10, E.3-11, and E.3-12. As provided in Table E.3-1 of the  
25 2024 LR GEIS, the 2 person-rem/reactor year calculated in the 2004 V.C. Summer severe  
26 accident mitigation alternatives (SAMA) analysis is almost three orders of magnitude lower than  
27 the 1996 LR GEIS estimate of the V.C. Summer population dose risk value of 1,381  
28 person-rem/reactor year.

29 The NRC staff did not identify any new and significant information regarding severe accidents  
30 during its independent review of Dominion’s ER (2023-TN10387), through the scoping process,  
31 or during the NRC staff’s audit (Dominion 2024-TN10391), that would significantly increase the  
32 environmental impact associated with severe accidents above the values previously projected in  
33 the 1996 LR GEIS. Therefore, the aggregate effect of new V.C. Summer SLR information is  
34 consistent with the expectations of the 2013 and 2024 LR GEISs that the probability-weighted  
35 consequences of severe accidents for V.C. Summer are bounded by the 1996 LR GEIS  
36 estimates. This reflects a substantial decrease in risk associated with a better understanding of  
37 the V.C. Summer internal events CDF. Thus, the NRC staff conclusion is that the overall impact  
38 of new and significant information since initial LR on the environmental impacts of severe  
39 accidents at V.C. Summer continues to be well below the impact previously evaluated in the  
40 1996 GEIS. Therefore, the conclusion in the 1996, 2013, and 2024 LR GEISs that “the  
41 probability-weighted consequences of atmospheric releases, fallout onto open bodies of water,  
42 releases to groundwater, and societal and economic impacts from severe accidents are SMALL”  
43 continues for V.C. Summer during the SLR period.

44 As part of its initial LR application submitted in 2002, the applicant included a SAMA analysis for  
45 V.C. Summer in its LR ER (SCE&G 2002-TN10558). As part of its review of the initial V.C.

1 Summer LR application, the NRC staff reviewed the analysis of SAMAs in Supplement 15 to  
2 NUREG-1437 (NRC 2004-TN7262).

3 Because the NRC staff has previously considered SAMAs for V.C. Summer, Dominion is not  
4 required to perform another SAMA analysis for its subsequent license renewal application  
5 (10 CFR 51.53(c)(3)(ii)(L)-TN10253). In its SLR application ER, Dominion evaluated areas of  
6 new and potentially significant information that could affect the environmental impact of  
7 postulated severe accidents during the SLR period (2023-TN10387). Dominion stated in its ER  
8 that it used the methodology in NEI 17-04, Revision 1, "Model SLR New and Significant  
9 Assessment Approach for SAMA," (2019-TN6815) to evaluate new and significant information  
10 as it relates to the V.C. Summer SLR SAMAs. NEI 17-04 is endorsed in Regulatory Guide 4.2,  
11 Supplement 1, Revision 2 (NRC 2024-TN10280).

12 Table E4.15-1 of the V.C. Summer SLR ER, as modified by responses to NRC staff RAIs  
13 (Dominion 2024-TN10391), presented the quantitative screening results from the bounding  
14 SAMA evaluations. As modified, this table demonstrates that none of the quantitative screening  
15 evaluations resulted in a reduction in the aggregate Level 2 frequency greater than 50 percent.  
16 In response to an NRC staff RAI (Dominion 2024-TN10391), the applicant clarified that  
17 consistent with the NEI 17-04 methodology (2019-TN6815), the quantitative assessment  
18 considered reduction in CDF as well as in each individual Level 2 release category that  
19 contributed more than one percent to plant risk. The applicant further stated that for all but one  
20 SAMA evaluation case (steam generator tube rupture), neither the CDF nor any one of the  
21 consequential release category frequencies are reduced by more than 50 percent. For the  
22 SAMA evaluation case (steam generator tube rupture), the reduction in large early release  
23 frequency exceeded 50 percent (i.e., 61 percent). The applicant, however, identified modeling  
24 conservatisms and stated that if the conservatisms were removed, the reduction in CDF and all  
25 consequential release category frequencies, including large early release frequency, would all  
26 be well below the 50 percent threshold.

27 The NRC staff reviewed V.C. Summer's onsite information process during a virtual audit (NRC  
28 2024-TN10551). RAIs and requests for confirmation of information (NRC 2024-TN10551) were  
29 submitted to Dominion, and the NRC staff found that the Dominion responses (2024-TN10391)  
30 were sufficient to complete the review. Further, the NRC staff did not find any potentially new  
31 and significant SAMAs.

32 Based on the NRC staff's review and evaluation of Dominion's analysis of new and potentially  
33 significant information regarding SAMAs and the NRC staff's independent analyses as  
34 described above, the staff finds that there is no new and significant information for V.C. Summer  
35 related to SAMAs.

### 36 **3.11.7 No-Action Alternative**

37 Under the no-action alternative, the NRC would not issue the subsequent renewed license, and  
38 V.C. Summer would shut down on or before the expiration of the current renewed license.  
39 Human health risks would be smaller following nuclear power plant shutdown. The reactor unit,  
40 which currently operates within regulatory limits, would emit less radioactive gaseous, liquid,  
41 and solid material to the environment. In addition, following shutdown, the variety of potential  
42 accidents at the nuclear power plant (radiological or industrial) would be reduced to a limited set  
43 associated with shutdown events and fuel handling and storage. In Section 3.11.6 of this SEIS,  
44 the NRC staff concluded that the impacts of continued nuclear power plant operation on human  
45 health would be SMALL, except for "Chronic Effects of Electromagnetic Fields (EMFs)," for



1 which the impacts are UNCERTAIN. In Section 3.11.6.4 of this SEIS, the NRC staff concluded  
2 that the impacts of accidents during operation are SMALL. Therefore, as radioactive emissions  
3 to the environment decrease, and as the likelihood and types of accidents decrease following  
4 shutdown, the NRC staff concludes that the risk to human health under the no-action alternative  
5 would be SMALL.

### 6 **3.11.8 Replacement Power Alternatives: Common Impacts**

7 Impacts on human health from the construction of a replacement power alternative would be  
8 similar to impacts associated with the construction of any major industrial facility. Compliance  
9 with worker protection rules, the use of personal protective equipment, training, and placement  
10 of engineered barriers would limit those impacts on workers to acceptable levels.

11 The human health impacts from the operation of a power station include public risk from  
12 inhalation of gaseous emissions. Regulatory agencies, including EPA and State of South  
13 Carolina agencies, base air emission standards and requirements on human health impacts.  
14 These agencies also impose site-specific emission limits to protect human health.

### 15 **3.11.9 Natural Gas Alternative**

16 The construction impacts of the natural gas alternative would include those identified in  
17 Section 3.11.8 of this SEIS. Because the NRC staff expects that the licensee would limit access  
18 to active construction areas to only authorized individuals, consistent with NRC regulations, the  
19 impacts on human health from the construction of a natural gas facility would be SMALL.

20 The human health effects from the operation of the natural gas alternative would include those  
21 identified in Section 3.11.8 of this SEIS, as common to the operation of all replacement power  
22 alternatives. Health risks may be attributable to nitrogen oxide emissions that contribute to ozone  
23 formation (NRC 2024-TN10161). Given the regulatory oversight exercised by the EPA and State  
24 agencies, the NRC staff concludes that the human health impacts from the natural gas  
25 alternative would be SMALL, except for “Chronic Effects of Electromagnetic Fields (EMFs),” for  
26 which the impacts are Uncategorized (UNCERTAIN). Therefore, the NRC staff concludes that  
27 the impacts on human health from the operation of the natural gas alternative would be SMALL.

### 28 **3.11.10 New Nuclear (Small Modular Reactor) Alternative**

29 The construction impacts of the new nuclear (SMR) alternative would include those identified in  
30 Section 3.11.8 of this SEIS, described above. Because the NRC staff expects that the licensee  
31 would limit access to active construction areas to only authorized individuals, the impacts on  
32 human health from the construction of two new nuclear units would be SMALL.

33 The human health effects from the operation of the new nuclear (SMR) alternative would be  
34 similar to those of operating the existing V.C. Summer. SMR designs would use the same type  
35 of fuel (i.e., form of the fuel, enrichment, burnup, and fuel cladding) as the plants considered in  
36 the NRC staff’s evaluation in the LR GEIS (NRC 2024-TN10161). As such, their impacts would  
37 be similar to those at V.C. Summer. As presented in Section 3.11.6 of this SEIS, impacts on  
38 human health from the operation of V.C. Summer would be SMALL, except for “Chronic Effects  
39 of Electromagnetic Fields (EMFs),” for which the impacts are Uncategorized (UNCERTAIN).  
40 Therefore, the NRC staff concludes that the impacts on human health from the operation of the  
41 new nuclear alternative would be SMALL.

1 **3.11.11 Natural Gas and Solar Combination Alternative**

2 Impacts on human health from construction of the natural gas and solar combination alternative  
3 would include those identified in Section 3.11.8 of this SEIS, as common to the construction of  
4 all replacement power alternatives. Because the NRC staff expects that the builder will limit  
5 access to the active construction area to only authorized individuals, the impacts on human  
6 health from the construction of the natural gas and solar combination alternative would be  
7 SMALL.

8 Impacts to human health during the operation of a natural gas alternative would include those  
9 identified in Section 3.11.11 of this SEIS.

10 Solar PV panels are encased in heavy-duty glass or plastic. Therefore, there is little risk that the  
11 small amounts of hazardous semiconductor material that they contain would be released into  
12 the environment. In the event of a fire, hazardous PM could be released into the atmosphere.  
13 Given the short duration of fires and the high melting points of the materials found in the solar  
14 PV panels, the impacts from inhalation would be minimal. Also, the risk of fire at ground-  
15 mounted solar installations is minimal because of precautions taken during site preparation,  
16 such as the removal of fuels and the lack of burnable materials contained in the solar PV  
17 panels. Another potential risk associated with PV systems and fire is the potential for shock or  
18 electrocution from contact with a high-voltage conductor. Proper procedures and clear marking  
19 of system components should be used to provide emergency responders with appropriate  
20 warnings to diminish the risk of shock or electrocution (DOT 2011-TN3942). Solar PV panels do  
21 not produce EMFs at levels considered harmful to human health, as established by the  
22 International Commission on Non-Ionizing Radiation Protection. These small EMFs diminish  
23 significantly with distance and are indistinguishable from normal background levels within  
24 several yards (DOT 2011-TN3942). Based on this information, the human health impacts from  
25 the operation of the solar PV component for the combination alternative would be SMALL.

26 Lithium-Ion batteries are used for utility-scale storage and would fall under industrial safety  
27 plans, environmental protection rules, and OSHA regulations. Lithium-ion batteries have the  
28 potential to catch fire due to an effect called thermal runaway; although an uncommon  
29 occurrence, thermal runaway is one of the most recognized safety issues for lithium-ion  
30 batteries. The self-perpetuating process can end in battery destruction, release of toxic gases,  
31 and has a high risk of fire or explosion (Łukasz et al. 2023-TN9618). Although thermal runaway  
32 is a concern, industrial safety practices would limit the impacts on human health and, therefore,  
33 overall impacts would be SMALL as part of the solar alternative.

34 Given the expected compliance with worker and environmental protection rules and the use of  
35 personal protective equipment, training, and engineered barriers, the NRC staff concludes that  
36 the potential human health impacts for this combination natural gas and solar alternative would  
37 be SMALL.

38 **3.11.12 New Nuclear and Solar Combination Alternative**

39 Impacts to human health during the installation and operation of a new nuclear (SMR)  
40 alternative would include those identified in Section 3.11.10 of this SEIS. Impacts to human  
41 health during the construction and operation of a new solar installation would include those  
42 identified in Section 3.11.11 of this SEIS. Therefore, based on this information, the NRC staff  
43 concludes that the impact of this combination alternative on human health would be SMALL.

1 **3.12 Environmental Justice**

2 Executive Order (EO) 12898, “Federal Actions to Address Environmental Justice in Minority  
3 Populations and Low-Income Populations” (59 FR 7629-TN1450), directs Federal agencies to  
4 identify and address, as appropriate, disproportionately high and adverse human health or  
5 environmental effects of their actions on minority and low-income populations, to the greatest  
6 extent practicable and permitted by law. Although independent agencies, such as the NRC,  
7 were only requested, rather than directed, to comply with the EO, NRC Chairman Ivan Selin, in  
8 a letter to the President, indicated that the NRC would endeavor to carry out the measures set  
9 forth in the EO and the accompanying memorandum as part of the NRC’s efforts to comply with  
10 the requirements of NEPA (NRC 1994-TN7650). In 2004, the Commission issued its “Policy  
11 Statement on the Treatment of Environmental Justice Matters in NRC Regulatory and Licensing  
12 Actions” (69 FR 52040-TN1009), which states that “[t]he Commission is committed to the  
13 general goals set forth in EO 12898, and strives to meet those goals as part of its NEPA review  
14 process.”<sup>1</sup>

15 The Council on Environmental Quality (CEQ) provides the following information in  
16 “Environmental Justice: Guidance Under the National Environmental Policy Act” (1997-TN452):

17 **Disproportionately High and Adverse Human Health Effects**

18 When determining whether human health effects are disproportionately high and  
19 adverse, agencies are to consider the following three factors to the extent  
20 practicable: (a) Whether the health effects, which may be measured in risks and  
21 rates, are significant (as employed by NEPA), or above generally accepted  
22 norms. Adverse health effects may include bodily impairment, infirmity, illness, or  
23 death; and (b) Whether the risk or rate of hazard exposure by a minority  
24 population, low-income population, or Indian Tribe to an environmental hazard is  
25 significant (as employed by NEPA) and appreciably exceeds or is likely to  
26 appreciably exceed the risk or rate to the general population or other appropriate  
27 comparison group; and (c) Whether health effects occur in a minority population,  
28 low-income population, or Indian Tribe affected by cumulative or multiple adverse  
29 exposures from environmental hazards.

30 **Disproportionately High and Adverse Environmental Effects**

31 When determining whether environmental effects are disproportionately high and  
32 adverse, agencies are to consider the following three factors to the extent  
33 practicable: (a) Whether there is or will be an impact on the natural or physical  
34 environment that significantly (as employed by NEPA) and adversely affects a  
35 minority population, low-income population, or Indian tribe. Such effects may  
36 include ecological, cultural, human health, economic, or social impacts on  
37 minority communities, low-income communities, or Indian tribes when those  
38 impacts are interrelated to impacts on the natural or physical environment; and

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<sup>1</sup> Executive Order 14096, “Revitalizing Our Nation’s Commitment to Environmental Justice for All,” Section 4(h) states, “Independent regulatory agencies are strongly encouraged to comply with the provisions of this order and to provide notice to the Chair of the CEQ of their intention to do so. The Chair of CEQ shall make such notices publicly available and maintain a list online of such agencies.” Given that the NRC is an independent regulatory agency, staff are awaiting Commission policy direction on addressing environmental justice in NRC NEPA reviews for licensing and regulatory actions in response to EO 14096. Regardless, NRC staff will continue to conduct the analysis of impacts on environmental justice populations consistent with Commission policy.

1 (b) Whether environmental effects are significant (as employed by NEPA) and  
2 are or may be having an adverse impact on minority populations, low-income  
3 populations, or Indian tribes that appreciably exceeds or is likely to appreciably  
4 exceed those on the general population or other appropriate comparison group;  
5 and (c) Whether the environmental effects occur or would occur in a minority  
6 population, low-income population, or Indian tribe affected by cumulative or  
7 multiple adverse exposures from environmental hazards.

8 The following environmental justice analysis assesses whether the proposed action  
9 (V.C. Summer SLR and continued operations) causes disproportionately high and adverse  
10 human health or environmental effects on minority and low-income populations. The NRC staff  
11 also assesses whether any alternatives to the proposed action of license renewal could result in  
12 disproportionately high and adverse human health or environmental effects on minority or low-  
13 income populations. In assessing the environmental justice impacts, the NRC staff defined  
14 minority individuals, minority populations, and low-income population, based on CEQ guidance,  
15 as follows (CEQ 1997-TN452):

#### 16 **Minority Individuals**

17 Individuals who identify themselves as members of the following population  
18 groups: Hispanic or Latino, American Indian or Alaska Native, Asian, Black or  
19 African American, Native Hawaiian or Other Pacific Islander, or two or more  
20 races, meaning individuals who identified themselves on a Census form as being  
21 a member of two or more races, for example, Hispanic and Asian.

#### 22 **Minority Populations**

23 Minority populations are identified when (1) the minority population of the  
24 affected area exceeds 50 percent or (2) the minority population percentage of the  
25 affected area is meaningfully greater than the minority population percentage in  
26 the general population or other appropriate unit of geographic analysis. Minority  
27 populations may be communities of individuals living in close geographic  
28 proximity to one another or they may be a geographically dispersed or transient  
29 set of individuals, such as migrant workers or Native Americans, who, as a  
30 group, experience common conditions with regard to environmental exposure or  
31 environmental effects. The appropriate geographic unit of analysis may be a  
32 political jurisdiction, county, region, or State, or some other similar unit that is  
33 chosen so as not to artificially dilute or inflate the affected minority population.

#### 34 **Low-Income Populations**

35 Low-income populations in an affected area are identified with the annual statistical  
36 poverty thresholds from the Census Bureau's Current Population Reports, Series  
37 P60, on Income and Poverty. Low-income populations may be communities of  
38 individuals living in close geographic proximity to one another, or they may be a set  
39 of individuals, such as migrant workers or Native Americans, who, as a group,  
40 experience common conditions of environmental exposure or effect.

41 In determining the location of minority and/or low-income populations, the NRC staff uses a  
42 50 mi (80 km) radius from the facility as the geographic area to perform a comparative analysis.  
43 The 50 mi (80 km) radius is consistent with the impact analysis conducted for human health  
44 impacts. The NRC staff compares the percentage of minority and/or low-income populations in  
45 the 50 mi (80 km) geographic area to the percentage of minority and/or low-income populations

1 in each census block group to determine which block groups exceeds the percentage, thereby  
2 identifying the location of these populations (2020-TN6399).

### 3 Minority Population

4 According to the USCB's 2020 Census data, there are a total of 901 block groups within a 50 mi  
5 (80 km) radius of the V.C. Summer site, and approximately 40.3 percent of the population  
6 residing within a 50 mi (80 km) radius of the V.C. Summer plant identified themselves as  
7 minority individuals (USCB 2020-TN10465). The largest minority populations were Black or  
8 African-American (approximately 29.7 percent), and Hispanic, Latino, or Spanish origin of any  
9 race (approximately 5.3 percent).

10 According to the CEQ definition, a minority population exists if the percentage of the minority  
11 population of an area (e.g., census block group) exceeds 50 percent or is meaningfully greater  
12 than the minority population percentage in the general population. The NRC staff's  
13 environmental justice analysis applied the meaningfully greater threshold in identifying higher  
14 concentrations of minority populations, with the meaningfully greater threshold being any  
15 percentage greater than the minority population within 50 mi (80 km) radius of V.C. Summer.  
16 Therefore, for the purposes of identifying higher concentrations of minority populations, census  
17 block groups within the 50 mi (80 km) radius of V.C. Summer were identified as minority block  
18 groups if the percentage of the minority population in the block group exceeded 40.3 percent,  
19 the percent of the minority population within the 50 mi (80 km) radius of V.C. Summer.

20 Based on this analysis, there are 391 minority block groups within a 50 mi (80 km) radius of  
21 V.C. Summer. Therefore, approximately 43.4 percent of block groups within a 50 mi (80 km)  
22 radius of V.C. Summer are minority block groups. As shown in Figure 3-12, minority block  
23 groups (race and ethnicity) are spread evenly throughout the 50 mi (80 km) radius, with  
24 concentrations in Fairfield and Richland counties and adjacent to the site.

### 25 Low-Income Population

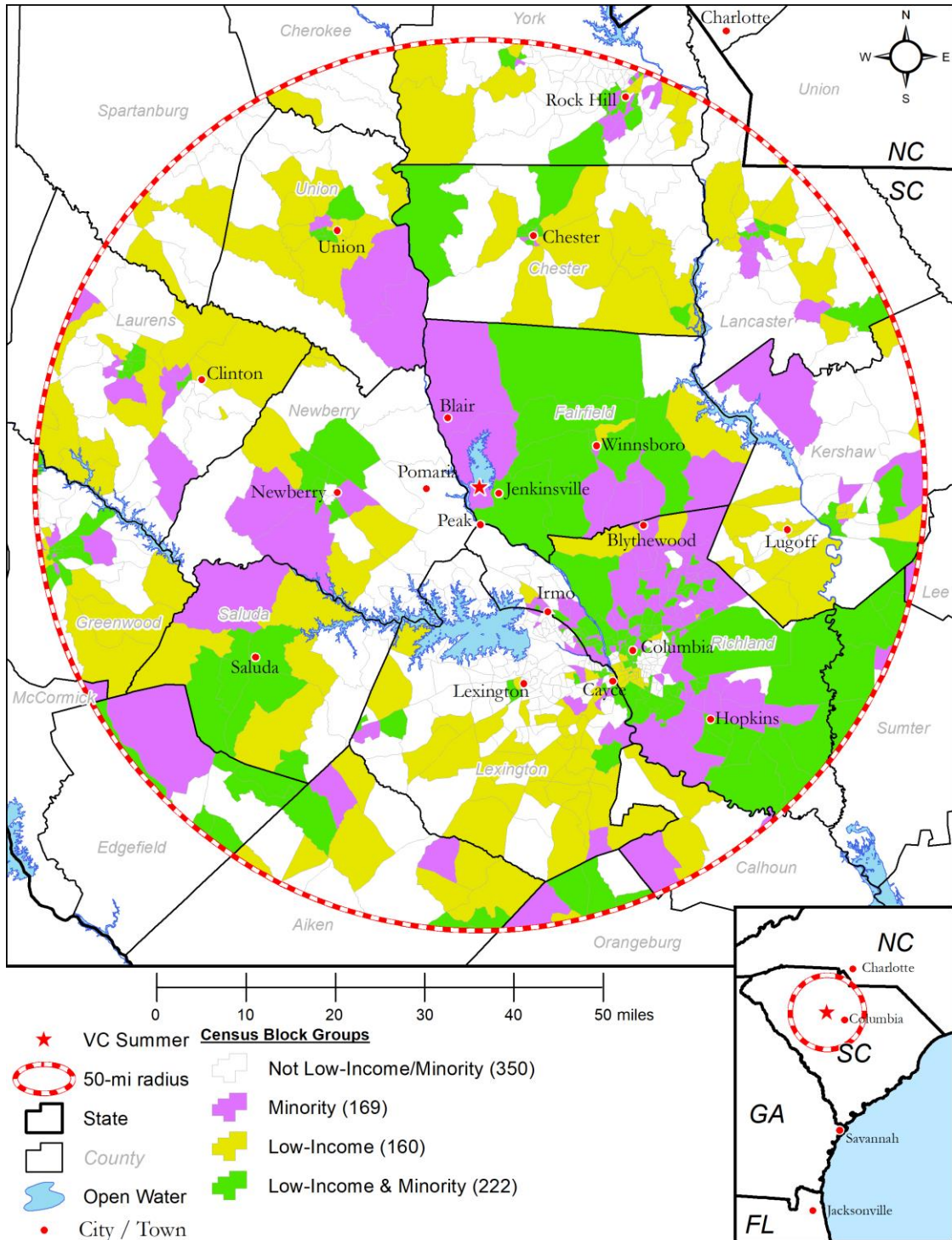
26 The USCB's 2018–2022 American Community Survey data identifies approximately  
27 15.1 percent of individuals residing within a 50 mi (80 km) radius of the V.C. Summer site as  
28 living below the Federal poverty threshold (USCB 2022-TN10556). The 2022 Federal poverty  
29 threshold was \$29,950 for a family of four (USCB 2023-TN10519).

30 Figure 3-12 below shows the location of predominantly low-income block groups within a 50 mi  
31 (80 km) radius of V.C. Summer. In accordance with NRC guidance (NRC 2020-TN6399),  
32 census block groups were considered low-income population block groups if the percentage of  
33 individuals living below the Federal poverty threshold within the block groups exceeded the  
34 percent of the individuals living below the Federal poverty threshold within 50 mi (80 km) radius  
35 of the V.C. Summer site.

36 Based on this analysis, there are 382 low-income block groups within a 50 mi (80 km) radius of  
37 the V.C. Summer site. Therefore, approximately 42.4 percent of the block groups within a 50 mi  
38 (80 km) radius of the site are low-income population block groups. As shown in Figure 3-12  
39 below, the low-income population block groups are distributed throughout the 50 mi (80 km)  
40 radius of V.C. Summer as well as adjacent to the site.

41 As discussed in Section 3.10.2 of this SEIS, according to the USCB's 2018–2022 American  
42 Community Survey 5 Year Estimates, people living in Fairfield, Richland and Newberry Counties  
43 had a median household income lower than the State average while people living in the

- 1 Lexington County had a household income higher than the State average. Additionally, the
- 2 percentages of individuals living below the poverty level in Richland County, Newberry County,
- 3 and Fairfield County are higher than the State average.



- 4
- 5 **Figure 3-12 Minority and Low-Income Block Groups within a 50 mi (80 km) Radius of**
- 6 **Virgil C. Summer Nuclear Station, South Carolina. Source: USCB 2022-**
- 7 **TN10556, USCB 2023-TN10465.**

1 **3.12.1 Proposed Action**

2 As documented in the 2024 LR GEIS (NRC 2024-TN10161) and shown in Table 3-2 of this  
3 SEIS, the NRC staff identified one plant-specific Category 2 issue related to environmental  
4 justice applicable to V.C. Summer during the SLR term. This Category 2 issue (Impacts on  
5 minority populations, low-income populations, and Indian Tribes) is analyzed below.

6 *3.12.1.1 Minority and Low-Income Populations*

7 The NRC addresses environmental justice matters for LR and SLR by: (1) identifying the  
8 location of minority and low-income populations that may be affected by the continued operation  
9 of the nuclear power plant during the license renewal term; (2) determining whether there would  
10 be any potential human health or environmental effects on these populations and special  
11 pathway receptors (groups or individuals with unique consumption practices and interactions  
12 with the environment; and (3) determining whether any of the effects may be disproportionately  
13 high and adverse.

14 Adverse health effects are measured in terms of the risk and rate of fatal or nonfatal adverse  
15 impacts on human health. Disproportionately high and adverse human health effects occur  
16 when the risk or rate of exposure to an environmental hazard for a minority or low-income  
17 population is significant and exceeds the risk or exposure rate for the general population or for  
18 another appropriate comparison group. Disproportionately high and adverse environmental  
19 effects refer to impacts or risks of impacts on the natural or physical environment in a minority or  
20 low-income community that are significant and appreciably exceed the environmental impact on  
21 the larger community. Such effects may include biological, cultural, economic, or social impacts.

22 Figure 3-12 shows the location of predominantly minority or low-income population block groups  
23 residing within a 50 mi (80 km) radius of the V.C. Summer site. This area of impact is consistent  
24 with the 50 mi (80 km) impact analysis for public and occupational health and safety. This  
25 chapter of this SEIS presents the assessment of environmental and human health impacts for  
26 each resource area. The analyses of impacts for all environmental resource areas indicated that  
27 the impact from SLR would be SMALL.

28 Potential impacts on minority and low-income populations (including migrant workers or Indian  
29 Tribes) would mostly consist of socioeconomic and radiological effects; however, radiation  
30 doses from continued operations during the SLR term are expected to continue at current  
31 levels, and they would remain within regulatory limits. Section 3.11.6.4 of this SEIS discusses  
32 the environmental impacts from postulated accidents that might occur during the SLR term,  
33 which include both design-basis and severe accidents. In both cases, the Commission has  
34 generically determined that impacts associated with design-basis accidents are small because  
35 nuclear power plants are designed and operated to withstand such accidents, and the  
36 probability-weighted consequences of severe accidents are SMALL.

37 Minority and low-income populations near V.C. Summer could experience human health and  
38 environmental effects from the continued operations. Based on the information and the analysis  
39 presented in this chapter, all human health and environmental impacts from the continued  
40 operation of V.C. Summer would be SMALL. Consequently, minority and low-income  
41 populations would not likely experience disproportionately high and adverse human health and  
42 environmental effects from the proposed action and the continued operation of V.C. Summer.

1 Subsistence Consumption of Fish and Wildlife

2 As part of addressing environmental justice concerns associated with V.C. Summer SLR, the  
3 NRC also assessed the potential radiological risk to special population groups (such as migrant  
4 workers or Indian Tribes) from exposure to radioactive material received through their unique  
5 consumption practices and interactions with the environment. Such exposure could occur  
6 through subsistence consumption of fish, wildlife, and native vegetation; contact with surface  
7 waters, sediments, and local produce; absorption of contaminants in sediments through the  
8 skin; and inhalation of airborne radioactive material released from the nuclear power plant  
9 during routine operation. The special pathway populations analysis is an important part of the  
10 environmental justice analysis because consumption patterns may reflect the traditional or  
11 cultural practices of minority and low-income populations in the area.

12 Section 4–4 of EO 12898, “Federal Actions to Address Environmental Justice in Minority  
13 Populations and Low-Income Populations,” (59 FR 7629-TN1450) directs Federal agencies,  
14 whenever practical and appropriate, to collect and analyze information on the consumption  
15 patterns of populations that rely principally on fish and/or wildlife for subsistence and to  
16 communicate to the public the risks of these consumption patterns. In this SEIS, the NRC  
17 considered whether there were any means for minority or low-income populations to be  
18 disproportionately affected by examining impacts on American Indians, Hispanics, migrant  
19 workers, and other traditional lifestyle special pathway populations. Dominion queried  
20 V.C. Summer staff to identify whether there are any subpopulations near the V.C. Summer site  
21 that engage in a subsistence-like lifestyle (2023-TN10387). Dominion did not identify  
22 subsistence activity in the vicinity of the V.C. Summer site (2023-TN10387). In 2009, the NRC  
23 conducted detailed local reconnaissance as part of the environmental review for the Units 2 and  
24 3 combined construction and operating license in which local community engagement revealed  
25 that subsistence fishing, hunting, and backyard gardening are practiced in the local vicinity of  
26 V.C. Summer, including the Monticello Reservoir, the Broad River, and in the Jenkinsville,  
27 Dawkins, and Blair communities (2010-TN10520). However, that detailed environmental review  
28 did not identify any disproportionately high and adverse impacts to subsistence resource  
29 practices from proposed construction or operations activities (NRC 2011-TN1723).

30 The assessment of special pathways considered the levels of radiological contaminants in air,  
31 drinking water, surface water, vegetation, fish, and shoreline sediment on or near the  
32 V.C. Summer plant. Radionuclides released to the atmosphere may deposit on soil and  
33 vegetation and may therefore eventually be incorporated into the human food chain. To assess  
34 the impact of reactor operations on humans from the ingestion pathway, Dominion collects and  
35 analyzes samples of air, water, sediment, fish, vegetation, if available, for radioactivity as part of  
36 its ongoing, comprehensive REMP. Each year a REMP land use census is conducted to assess  
37 the contribution of radionuclides to the environment resulting from V.C. Summer operation. The  
38 census is conducted within a 5 mi (8 km) radius of the V.C. Summer site with the locations of  
39 the nearest resident, available milk animal, and vegetable garden being recorded and mapped.  
40 The results for each sample type are discussed in the publicly available annual radiological  
41 environmental operating reports and compared to historical data to determine if there are any  
42 observable trends.

43 The REMP results for 2021 and 2022 concluded that there are no discernable trends or  
44 increase in radiological parameters when comparing current monitoring results to  
45 pre-operational studies. There is no detectable radiological effect on the surrounding  
46 environment due to operation of V.C. Summer (Dominion 2023-TN10387).



1 Based on the REMP data, special pathway receptor populations in the region would not likely  
2 experience disproportionately high and adverse human health impacts because of subsistence  
3 consumption. In addition, the continued operation of V.C. Summer would not have  
4 disproportionate and adverse human health and environmental effects on these populations.

### 5 **3.12.2 No-Action Alternative**

6 Under the no-action alternative, the NRC would not renew the operating license, and  
7 V.C. Summer would permanently shut down on or before the expiration of the current renewed  
8 facility operating license. Impacts on minority and low-income populations would depend on the  
9 number of jobs and the amount of tax revenues lost by communities in the immediate vicinity of  
10 the nuclear power plant after it ceases operations. Not renewing the operating license and  
11 terminating reactor operations could have a noticeable impact on socioeconomic conditions in  
12 the communities located near the V.C. Summer site. The loss of jobs and income could have an  
13 immediate socioeconomic impact. Some, but not all, of the approximately 989 permanent  
14 workers could leave the area. In addition, the V.C. Summer plant would generate less tax  
15 revenue, which could reduce the availability of public services. This reduction could  
16 disproportionately affect minority and low-income populations that may have become dependent  
17 on these services.

### 18 **3.12.3 Replacement Power Alternatives: Common Impacts**

19 The following discussions identify common impacts from the construction and operation of  
20 energy generating facilities that could disproportionately affect minority and low-income  
21 populations. Disproportionately high and adverse human health and environmental effects on  
22 minority and low-income populations would depend on the specific site location, power plant  
23 design, and operational characteristics of the new energy generating facility. These discussions  
24 encompass the specific impacts of each of the replacement power alternatives, which are the  
25 natural gas, new nuclear (small modular reactor), natural gas and solar combination, and new  
26 nuclear and solar combination.

#### 27 Construction

28 Potential impacts to minority and low-income populations from the construction of a replacement  
29 power plant would mostly consist of environmental (e.g., noise, dust, and traffic) and  
30 socioeconomic effects (employment and housing impacts). The extent of the effects  
31 experienced by these populations is difficult to determine because it would depend on the  
32 specific location of the energy generating facility and affected transportation routes. Noise and  
33 dust impacts from construction would be short-term and primarily limited to onsite activities.  
34 Minority and low-income populations residing near access roads would be affected by increased  
35 truck and commuter vehicle traffic during construction, especially during shift changes.  
36 However, these effects would be temporary, limited to certain hours of the day, and would not  
37 likely be high and adverse. Increased demand for temporary housing during construction could  
38 disproportionately affect low-income populations reliant on low-cost rental housing. However,  
39 given the proximity of V.C. Summer to the Columbia metropolitan area, construction workers  
40 could commute to the site, thereby reducing the potential local demand for rental housing.

#### 41 Operation

42 Minority and low-income populations living near new replacement power generating facilities  
43 that rely on subsistence consumption of fish and wildlife could be disproportionately affected.  
44 Emissions during power plant operations could disproportionately affect nearby minority and

1 low-income populations, depending on the type(s) of replacement power generation facility.  
2 However, to operate, emissions must remain within regulatory limits.

### 3 Conclusion

4 Based on this information and the analysis of human health and environmental impacts  
5 presented in this SEIS, it is unlikely that a new energy generating facility would be constructed  
6 and allowed to operate in a manner that would result in disproportionately high and adverse  
7 human health and environmental effects on minority and low-income populations. However, this  
8 determination would also depend on the specific location, power plant design, and operational  
9 characteristics of the energy generating facility. Ultimately, the NRC staff cannot determine  
10 whether the replacement power alternatives (i.e., natural gas, new nuclear [small modular  
11 reactor], natural gas and solar combination, and new nuclear and solar combination) would  
12 result in disproportionately high and adverse human health and environmental effects on  
13 minority and low-income populations.

### 14 **3.13 Waste Management**

15 Like any operating nuclear power plant, V.C. Summer would produce both radioactive and  
16 nonradioactive waste during the SLR period. This section of the SEIS describes waste  
17 management and pollution prevention at V.C. Summer. The description of these waste  
18 management activities is followed by the NRC staff's analysis of the potential impacts of waste  
19 management activities from the proposed action (SLR) and alternatives to the proposed action.

#### 20 **3.13.1 Radioactive Waste**

21 The NRC licenses nuclear power plants with the expectation that they will release a limited  
22 amount of radioactive material to both the air and water during normal operations. The NRC  
23 regulations require that gaseous and liquid radioactive releases from nuclear power plants meet  
24 radiation dose-based limits specified in 10 CFR Part 20 (TN283), "Standards for Protection  
25 Against Radiation," and the ALARA criteria in 10 CFR Part 50 (TN249), Appendix I, "Numerical  
26 Guides for Design Objectives and Limiting Conditions for Operation to Meet the Criterion 'As  
27 Low as is Reasonably Achievable' for Radioactive Material in Light-Water-Cooled Nuclear  
28 Power Reactor Effluents." In other words, the NRC places regulatory limits on the radiation dose  
29 that members of the public can receive from radioactive effluents of a nuclear power plant. For  
30 this reason, all nuclear power plants use radioactive waste management systems to control and  
31 monitor radioactive wastes.

32 V.C. Summer uses liquid, gaseous, and solid waste processing systems to collect and treat, as  
33 needed, radioactive materials produced as a byproduct of nuclear power plant operations.  
34 Radioactive materials in liquid, gaseous, and solid effluents are reduced before being released  
35 into the environment so that the resultant dose to members of the public from these effluents is  
36 well within the NRC and EPA dose standards. Radionuclides that can be efficiently removed  
37 from the liquid and gaseous effluents before release are converted to a solid waste form for  
38 disposal in a licensed disposal facility.

39 Dominion maintains a REMP to assess the radiological impact, if any, to the public and the  
40 environment from radioactive effluents released during operations at V.C. Summer (2023-  
41 TN10387).

1 Dominion has an ODCM that contains the methods and parameters for calculating offsite doses  
2 resulting from liquid and gaseous radioactive effluents. These methods ensure that radioactive  
3 material discharges from V.C. Summer meet NRC and EPA regulatory dose standards. The  
4 ODCM also contains the requirements for the REMP (ODCM) (Dominion 2020-TN10557).

### 5 3.13.1.1 Radioactive Liquid Waste Management

6 Dominion uses waste management systems to collect, analyze, and process radioactive liquids  
7 produced at V.C. Summer. The V.C. Summer liquid waste processing system (LWPS) meets  
8 the design objectives of 10 CFR Part 50 (TN249), Appendix I, and controls the processing,  
9 disposal, and release of radioactive liquid wastes.

10 The LWPS consists of five collection systems: (1) the waste holdup tank; (2) the floor drain tank;  
11 (3) the laundry and hot shower tank; (4) the excess LWPS; and (5) the laboratory drain system,  
12 wastewater treatment and spent resin processing. Liquid effluent is sampled before discharge.  
13 Based on the laboratory analysis, liquid effluents are either released under controlled conditions  
14 via the penstocks of the Fairfield Pumped Storage Facility or retained for further processing with  
15 eventual release to the circulating discharge canal or the Fairfield Pumped Storage Facility  
16 penstocks. Otherwise, the liquid waste may be reused in the plant.

17 The liquid waste disposal system was designed to receive, process, and discharge potentially  
18 radioactive liquid waste. Holdup capacity is provided for retention of liquid effluents, particularly  
19 where unfavorable environmental conditions can be expected to require operational limitations  
20 upon the release of radioactive effluents to the environment. Radioactive fluids entering the  
21 waste disposal system are processed or collected in tanks until a determination of subsequent  
22 treatment can be made. The waste is sampled and analyzed to determine the quantity of  
23 radioactivity. Liquid wastes are processed as required and then released under controlled  
24 conditions. In summary, the liquid waste effluent is diluted as necessary to permissible  
25 concentration limits. Waste released from the three units is integrated and controlled by process  
26 radiation monitors, interlocks, and by the operator, to ensure that it does not exceed the station  
27 release limits.

28 All liquid wastes are monitored prior to release to ensure that they will not exceed the limits of  
29 10 CFR Part 20 (TN283). The radiation monitoring system monitors the effluent, closing the  
30 discharge valve if the amount of radioactive material in the effluent exceeds preset values.  
31 Dominion performs offsite dose calculations based on effluent samples obtained at this release  
32 point to ensure that the limits of 10 CFR Part 50 (TN249), Appendix I are not exceeded. The  
33 ODCM prescribes the alarm/trip setpoints for the liquid effluent radiation monitors. Dominion's  
34 use of these radiological waste systems and the procedural requirements in the ODCM provides  
35 assurance that the dose from radiological liquid effluents at V.C. Summer complies with NRC  
36 and EPA regulatory dose standards. Dominion calculates dose estimates for members of the  
37 public using radiological liquid effluent release data.

38 Dominion's annual radioactive effluent release reports contain a detailed presentation of liquid  
39 effluents released from V.C. Summer and the resultant calculated doses (2024-TN10415).  
40 These reports are publicly available on the NRC's website (<https://www.nrc.gov/>).

41 The NRC staff reviewed five years of radioactive effluent release data from 2019 through 2023  
42 (Dominion 2020-TN10411, Dominion 2021-TN10412, Dominion 2022-TN10413, Dominion  
43 2023-TN10414, Dominion 2024-TN10415). This period provides a data set that covers a broad  
44 range of activities that occur at a nuclear power plant, such as refueling outages, routine

1 operation, and maintenance, which can affect the generation of radioactive effluents into the  
2 environment. The NRC staff compared the data against NRC dose limits and looked for  
3 indications of adverse trends (i.e., increasing dose levels or increasing radioactivity levels).

4 As discussed below, effluent release data for the 5-year period analyzed by the NRC staff were  
5 found to be well below regulatory standards. For example, the calculated doses from radioactive  
6 liquid effluents released from V.C. Summer during 2023 (Dominion 2024-TN10415) are  
7 summarized below:

- 8 • The total-body dose to an offsite member of the public from V.C. Summer radioactive  
9 effluents was  $6.74 \times 10^{-3}$  millirem (mrem) ( $6.74 \times 10^{-5}$  millisievert [mSv]), which is well below  
10 the 3 mrem (0.03 mSv) dose criterion in Appendix I to 10 CFR Part 50 (TN249).
- 11 • The maximum organ dose (gastrointestinal tract) to an offsite member of the public from  
12 V.C. Summer radioactive effluents was  $8.15 \times 10^{-3}$  mrem ( $8.15 \times 10^{-5}$  mSv), which is well  
13 below the 10 mrem (0.1 mSv) dose criterion in Appendix I to 10 CFR Part 50.

14 The NRC staff's review of Dominion's radioactive liquid effluent control program shows that  
15 radiation doses to members of the public were maintained within NRC and EPA radiation  
16 protection standards, as contained in Appendix I to 10 CFR Part 50 (TN249), 10 CFR Part 20  
17 (TN283), and Title 40, "Protection of Environment," of 40 CFR Part 190 (TN739),  
18 "Environmental Radiation Protection Standards for Nuclear Power Operations." The NRC staff  
19 observed no adverse trends in the dose levels.

20 During the SLR term, Dominion will continue to perform routine nuclear power plant refueling  
21 and maintenance activities. Based on Dominion's past performance in operating a radioactive  
22 waste system at V.C. Summer that maintains ALARA doses from radioactive liquid effluents, the  
23 NRC staff expects that Dominion will maintain similar performance during the SLR term.

#### 24 3.13.1.2 Radioactive Gaseous Waste Management

25 Radioactive gaseous wastes develop from gases in liquid contained in tanks and piping at  
26 V.C. Summer. The gaseous wastes are monitored and released at an acceptable rate  
27 designated by the ODCM. The ODCM determines the effluent release rate to ensure that  
28 releases are within predetermined limits, which ascertains compliance with dose limitations of  
29 licensee commitments (Dominion 2020-TN10557). The gaseous radioactive waste systems  
30 provide gas holdup for decay, and the site releases the gases under controlled conditions.

31 Dominion calculates dose estimates for members of the public based on radioactive gaseous  
32 effluent release data and atmospheric transport models. Dominion's annual radioactive effluent  
33 release reports present in detail the radiological gaseous effluents released from V.C. Summer  
34 and the resultant calculated doses. As described above in Section 3.13.1.1, the NRC staff  
35 reviewed five years of radioactive effluent release data from the 2019 through 2023 reports  
36 (Dominion 2020-TN10411, Dominion 2021-TN10412, Dominion 2022-TN10413, Dominion  
37 2023-TN10414, Dominion 2024-TN10415). The NRC staff compared the data against NRC  
38 dose limits and looked for indications of adverse trends (i.e., increasing dose levels) over the  
39 period.

40 As a representative year, the following summarizes the calculated doses from radioactive  
41 gaseous effluents released from V.C. Summer during 2023 (Dominion 2024-TN10415):

- 1 • The air dose due to noble gases with resulting gamma radiation in gaseous effluents was  
2  $4.76 \times 10^{-4}$  millirad (mrad) ( $4.76 \times 10^{-6}$  milligray), which is well below the 10 mrad/yr  
3 (0.1 milligray/yr) dose criterion in Appendix I to 10 CFR Part 50 (TN249).
- 4 • The air dose from beta radiation in gaseous effluents was  $1.74 \times 10^{-4}$  mrad ( $1.74 \times 10^{-6}$   
5 milligray), which is well below the 20 mrad/yr (0.2 milligray/yr) dose criterion in Appendix I to  
6 10 CFR Part 50 (TN249).
- 7 • The critical organ dose to an offsite member of the public from radiation in gaseous effluents  
8 as a result of radioisotopes of iodine, particulates, tritium gases and carbon-14 was  
9  $2.03 \times 10^{-2}$  mrem ( $2.03 \times 10^{-4}$  mSv), which is below the 15 mrem/yr (0.15 mSv/yr) dose  
10 criterion in Appendix I to 10 CFR Part 50 (TN249).

11 The NRC staff's review of the V.C. Summer radioactive gaseous effluent control program  
12 showed radiation doses to members of the public that were well below NRC and EPA radiation  
13 protection standards contained in Appendix I to 10 CFR Part 50 (TN249), 10 CFR Part 20  
14 (TN283), and 40 CFR Part 190 (TN739). The NRC staff observed no adverse trends in the dose  
15 levels over the five years reviewed.

16 During the SLR term, Dominion will continue to perform routine nuclear power plant refueling  
17 and maintenance activities. Based on Dominion's past performance in operating a radioactive  
18 waste system at V.C. Summer that maintains ALARA doses from radioactive gaseous effluents,  
19 the NRC staff expects that V.C. Summer will maintain similar performance during the SLR term.

### 20 *3.13.1.3 Radioactive Solid Waste Management*

21 V.C. Summer's solid waste disposal system provides for packaging and/or solidification of  
22 radioactive waste that will subsequently be shipped offsite to an approved burial facility. These  
23 activities reduce the amount of waste shipped for offsite disposal. Solid radioactive wastes are  
24 logged, processed, packaged, and stored for subsequent shipment and offsite burial. Solid  
25 radioactive wastes and potentially radioactive wastes include reactor components, equipment  
26 and tools removed from service, chemical laboratory samples, spent resins, used filter  
27 cartridges, and radioactively contaminated hardware, as well as compacted wastes such as  
28 contaminated protective clothing, paper, rags, and other trash generated from nuclear power  
29 plant design modifications and operations, and routine maintenance activities. In addition,  
30 nonfuel solid wastes result from treating and separating radionuclides from gases and liquids,  
31 and from removing containment material from various reactor areas.

### 32 *3.13.1.4 Radioactive Waste Storage*

33 At V.C. Summer, low-level radioactive waste (LLRW) is stored temporarily onsite at a low-level  
34 waste storage facility before being shipped offsite for processing or disposal at licensed LLRW  
35 treatment and disposal facilities. V.C. Summer has contracts with Alaron Nuclear Services,  
36 UniTech Services Group, and EnergySolutions—Barnwell Processing Facility for the processing  
37 and disposal of all radiologically contaminated material. LLRW is classified as Class A, Class B,  
38 or Class C (minor volumes are classified as greater than Class C). Class A includes both dry  
39 active waste and processed waste (e.g., dewatered resins). Classes B and C normally include a  
40 low percentage of the LLRW generated. Radioactive waste that is greater than Class C waste is  
41 the responsibility of the Federal government. Low-level mixed waste is managed through  
42 Dominion's site procedures that meet the requirements of the SCDHEC Hazardous Waste  
43 Management Regulations. Dominion uses a contractor to characterize, label, and manifest the

1 waste, and transport it to a facility that can encapsulate, treat, or otherwise prepare the waste  
2 for disposal. As indicated in Dominion’s ER and as discussed with the NRC staff during the  
3 virtual audit (2024-TN10391), V.C. Summer has sufficient existing capability to store all  
4 generated LLRW onsite. No additional construction of onsite storage facilities is necessary for  
5 LLRW storage during the subsequent period of extended operation (Dominion 2023-TN10387).

6 V.C. Summer stores spent fuel in a spent fuel pool and in an onsite ISFSI. The ISFSI safely  
7 stores spent fuel onsite in licensed and approved dry cask storage containers. Spent fuel is  
8 stored in the ISFSI under the general license. Section E2.2.6.4 of the Dominion ER states that  
9 the ISFSI concrete pad is designed to store the spent fuel generation for 80 years of operation.

### 10 3.13.1.5 *Radiological Environmental Monitoring Program*

11 Dominion maintains a REMP to assess the radiological impact, if any, to the public and the  
12 environment from V.C. Summer operations. The REMP measures the aquatic, terrestrial, and  
13 atmospheric environment for ambient radiation and radioactivity. Monitoring is conducted for the  
14 following: direct radiation, air, precipitation, well water, river water, surface water, milk, food  
15 products and vegetation (such as edible broad leaf vegetation), fish, silt, and shoreline  
16 sediment. The REMP also measures background radiation (i.e., cosmic sources, global fallout,  
17 and naturally occurring radioactive material, including radon). As part of the REMP, Dominion  
18 conducts analyses of selected wells for the presence of gamma emitters and tritium in  
19 groundwater on a quarterly basis (2023-TN10387).

20 The NRC staff reviewed five years of annual radiological environmental monitoring data from  
21 2019 through 2023 (SCE&G 2019-TN10422; Dominion 2020-TN10416, Dominion 2021-  
22 TN10417, Dominion 2022-TN10418, Dominion 2023-TN10419, Dominion 2024-TN10420). This  
23 period provides a data set that covers a broad range of activities that occur at a nuclear power  
24 plant, such as refueling outages, routine operation, and maintenance that can affect the  
25 generation and release of radioactive effluents into the environment. The NRC reviewed the  
26 data for indications of adverse trends (i.e., increasing radioactivity levels) over the period of  
27 2019 through 2023.

28 In addition to the REMP, Dominion established an onsite groundwater protection initiative  
29 program in 2008 in accordance with NEI 07-07, “Industry Groundwater Protection Initiative” (NEI  
30 2007-TN1913). This program monitors the onsite nuclear power plant environment to detect  
31 leaks from nuclear power plant systems and pipes containing radioactive liquid. Section 3.5.2.3,  
32 of this SEIS contains information on V.C. Summer’s groundwater protection initiative program.

33 Based on its review of the REMP data, the NRC staff finds no apparent increasing trend in  
34 concentration or pattern indicating persistently high tritium or other radionuclide concentration  
35 that might indicate an ongoing inadvertent release from V.C. Summer. The groundwater  
36 monitoring program data at V.C. Summer show that Dominion monitors, characterizes, and  
37 actively remediates spills, and that there were no significant radiological impacts to the offsite  
38 environment from operations at V.C. Summer.

### 39 **3.13.2 Nonradioactive Waste**

40 V.C. Summer generates nonradioactive waste as a result of nuclear power plant maintenance,  
41 cleaning, and operational processes. V.C. Summer manages nonradioactive wastes in  
42 accordance with applicable Federal and State regulations, as implemented through its corporate  
43 procedures. V.C. Summer generates and manages hazardous wastes, nonhazardous wastes,

1 and universal wastes. Dominion maintains a list of waste vendors that it has approved for use  
2 across the entire company to remove and dispose of the nonradioactive wastes offsite (2023-  
3 TN10387).

4 Waste minimization and pollution prevention are important elements of operations at all nuclear  
5 power plants. Licensees are required to consider pollution prevention measures as dictated by  
6 the Pollution Prevention Act (Public Law 101 5084 TN6607) and the Resource Conservation and  
7 Recovery Act of 1976, as amended (Public Law 94 580 TN1281).

8 The Resource Conservation and Recovery Act governs the disposal of solid waste. The  
9 SCDHEC is authorized by the EPA to implement the Resource Conservation and Recovery Act  
10 and regulate solid and hazardous waste in South Carolina (Dominion 2023-TN10387). V.C.  
11 Summer has a nonradioactive waste management program to handle nonradioactive waste in  
12 accordance with Federal, State, and corporate regulations and procedures. V.C. Summer  
13 maintains a waste minimization program that uses material control, process control, waste  
14 management, recycling, and feedback to reduce waste.

15 The V.C. Summer SWPPP identifies potential sources of pollution that may affect the quality of  
16 stormwater discharges from permitted outfalls. The SWPPP also describes best management  
17 practices for reducing pollutants in stormwater discharges and assuring compliance with the  
18 site's NPDES permit (Dominion 2023-TN10387).

19 V.C. Summer also has an environmental management system (Dominion 2023-TN10387).  
20 Procedures are in place to monitor areas within the site that have the potential to discharge oil  
21 into or on navigable waters, in accordance with the regulations in 40 CFR Part 112, "Oil Pollution  
22 Prevention" (TN1041). The Pollution Incident/Hazardous Substance Spill Procedure identifies  
23 and describes the procedures, materials, equipment, and facilities that Dominion uses to  
24 minimize the frequency and severity of oil spills at V.C. Summer.

25 V.C. Summer is subject to the EPA reporting requirements in 40 CFR Part 110, "Discharge of  
26 Oil," under CWA Section 311(b)(4) (TN8485). Under these regulations, V.C. Summer must  
27 report to the U.S. Coast Guard National Response Center any discharges of oil if the quantity  
28 may be harmful to the public health or welfare or to the environment. Based on the NRC staff's  
29 review of Section E9.5.3.6 of the Dominion ER (2023-TN10387) and a review of records from  
30 2017–2021, there have been two releases at V.C. Summer that were reported (2023-TN10387).  
31 In November 2021, less than 50 gal (189.2 L) of mineral oil was estimated to have entered the  
32 Monticello Reservoir. In 2020, and in accordance with 10 CFR 50.72(b)(2)(xi), V.C. Summer  
33 reported a transmission fluid spill to the SCDHEC, resulting in 1 to 2 oz (29 to 59 mL) of  
34 transmission fluid being released into the Monticello Reservoir (TN249). This spill did not violate  
35 any NRC regulations or reporting criteria.

36 V.C. Summer is also subject to the reporting provisions of SC R. 61-92.280.60 which requires  
37 reporting the release of a regulated substance from an underground storage tank containing a  
38 petroleum product or hazardous substance. Based on the NRC staff's review of  
39 Section E9.5.13.6 of the Dominion ER (2023-TN10387) and a review of records from 2019–  
40 2023, no reportable spills under the reporting provisions of SC R. 61-92.280.60 occurred to  
41 date. In addition, the applicant confirmed that there have been no reportable spills that would  
42 trigger this notification requirement since the ER was written (Dominion 2024-TN10391).

1 **3.13.3 Proposed Action**

2 As described in the 2024 LR GEIS (NRC 2024-TN10161) and as cited in Table 3-1 for generic  
3 issues related to waste management, the impacts of nuclear power plant SLR and continued  
4 operations would be SMALL during the SLR term. The NRC staff's review did not identify  
5 any new and significant information that would change the conclusion in the LR GEIS. Thus,  
6 as concluded in the LR GEIS, for these Category 1 (generic) issues, the impacts of  
7 continued operation of V.C. Summer on waste management during the SLR term would be  
8 SMALL.

9 The ultimate disposal of spent fuel in a potential future geologic repository is a separate and  
10 independent licensing action that is outside the regulatory scope of this review. Per 10 CFR  
11 Part 51 (10 CFR Part 51-TN10253) Subpart A, Appendix B, the Commission concludes that the  
12 impacts presented in NUREG-2157 (NRC 2014-TN4117) would not be sufficiently large to  
13 require the NEPA conclusion, for any plant, that the option of extended operation under 10 CFR  
14 Part 54 (TN4878) should be eliminated. Accordingly, while the Commission has not assigned a  
15 single level of significance for the impacts of spent nuclear fuel and high-level waste disposal,  
16 this issue is considered generic to all nuclear power plants. There are no plant-specific  
17 (Category 2) waste management issues applicable to V.C. Summer.

18 **3.13.4 No-Action Alternative**

19 Under the no-action alternative, V.C. Summer would cease operation at the end of the term of  
20 the current renewed facility operating license or sooner and enter decommissioning. After  
21 entering decommissioning, the nuclear power plant would generate less spent nuclear fuel, emit  
22 less gaseous and liquid radioactive effluents into the environment, and generate less low-level  
23 radioactive and nonradioactive wastes. In addition, following shutdown, the variety of potential  
24 accidents at the nuclear power plant (radiological and industrial) would be reduced to a limited  
25 set associated with shutdown events and fuel handling and storage. Therefore, as radioactive  
26 emissions to the environment decrease, and the likelihood and variety of accidents decrease  
27 following shutdown and decommissioning, the NRC staff concludes that impacts resulting from  
28 waste management from implementation of the no-action alternative would be SMALL.

29 **3.13.5 Replacement Power Alternatives: Common Impacts**

30 Impacts from waste management common to all analyzed replacement power alternatives  
31 would be from construction-related nonradiological debris generated during construction  
32 activities. This waste would be recycled or disposed of in approved landfills.

33 **3.13.6 Natural Gas Alternative**

34 Impacts from the waste generated during the construction of the natural gas combined-cycle  
35 would include those identified in Section 3.13.5 of this SEIS as common to all replacement  
36 power alternatives.

37 Waste generation from operation of the natural gas technology would be minimal. The only  
38 significant waste generated at a natural gas combined-cycle power plant would be spent  
39 selective catalytic reduction catalyst (plants use selective catalytic reduction catalyst to control  
40 nitrogen oxide emissions). This spent catalyst is considered hazardous and would be disposed  
41 of at a facility that handles hazardous materials. Other than the spent selective catalytic  
42 reduction catalyst, waste generation at an operating natural gas-fired plant would be limited



1 largely to typical operations and maintenance of nonhazardous waste. Based on this  
2 information, the NRC staff concludes that the waste impacts for the natural gas combined-cycle  
3 alternative would be SMALL.

#### 4 **3.13.7 New Nuclear (Small Modular Reactor) Alternative**

5 Impacts from the waste generated during the construction of the new nuclear alternative would  
6 include those identified in Section 3.13.5 above, as common to all replacement power  
7 alternatives. During normal nuclear power plant operations, routine nuclear power plant  
8 maintenance and cleaning activities would generate radioactive low-level waste, spent nuclear  
9 fuel, high-level waste, and nonradioactive waste. Sections 3.13.1 and 3.13.2 of this SEIS  
10 discuss radioactive and nonradioactive waste management at V.C. Summer. Advanced light-  
11 water reactors would use the same type of fuel (i.e., form of the fuel, enrichment, burnup, and  
12 fuel cladding) as those nuclear power plants considered in the NRC staff's evaluation in the  
13 LR GEIS (NRC 2024-TN10161). As such, all wastes generated would be similar to those  
14 generated at V.C. Summer. According to the LR GEIS, the NRC does not expect the generation  
15 and management of solid radioactive and nonradioactive waste during the SLR term to result in  
16 significant environmental impacts. Based on this information, the NRC staff concludes that the  
17 impacts on waste from the operation of the new nuclear alternative would be SMALL.

#### 18 **3.13.8 Natural Gas and Solar Combination Alternative**

19 Impacts from the waste generated during the construction of a natural gas plant would include  
20 those identified in Section 3.13.5 and Section 3.13.6 of this SEIS.

21 The construction of the solar PV facilities would create sanitary and industrial waste. This waste  
22 could be recycled or shipped to an offsite waste disposal facility. The battery storage system at  
23 each solar installation would have to be replaced after several years of operation; however,  
24 much of the components are recyclable, thereby minimizing the waste generation. All the waste  
25 would be handled in accordance with appropriate South Carolina regulations. Impacts on waste  
26 management resulting from the construction and operation of the solar PV facilities of the  
27 combination alternative would be minimal. In summary, the NRC staff concludes that the waste  
28 management impacts resulting from the construction and operation of the PV facilities would be  
29 SMALL.

30 Based on the above, the NRC staff concludes that the waste impacts for the natural gas and  
31 solar combination alternative would be SMALL.

#### 32 **3.13.9 New Nuclear and Solar Combination Alternative**

33 Impacts from the waste generated during the construction of a new nuclear (SMR) alternative  
34 would include those identified in Section 3.13.7 of this SEIS. Impacts from the waste generated  
35 during the construction of a new solar installations would include those identified in  
36 Section 3.13.8 of this SEIS.

37 Based on the above, the NRC staff concludes that the waste impacts for the new nuclear and  
38 solar combination alternative would be SMALL.

1 **3.14 Evaluation of New and Significant Information**

2 As stated in Section 1.5 of this SEIS, for Category 1 (generic) issues, the NRC staff can rely on  
3 the analysis in the LR GEIS (NRC 2024-TN10161) unless otherwise noted. Table 3-1 lists the  
4 Category 1 issues that apply to V.C. Summer during the proposed SLR period. For these  
5 issues, the NRC staff did not identify any new and significant information based on its review of  
6 Dominion’s ER (Dominion 2023-TN10387), the environmental site audits, review of available  
7 information as cited in this SEIS or information arising from the environmental scoping process  
8 that would change the conclusions presented in the LR GEIS.

9 New and significant information must be new based on information evaluated in the LR GEIS  
10 (NRC 2024-TN10161) as codified in Table B-1 of Appendix B to Subpart A of 10 CFR Part 51  
11 (TN10253). Such information must also bear on the proposed action or its impacts, presenting a  
12 picture of the impacts that are seriously different from those envisioned in the LR GEIS (i.e.,  
13 impacts of greater severity than impacts considered in the LR GEIS, considering their intensity  
14 and context).

15 The NRC defines new and significant information in Regulatory Guide 4.2, Supplement 1,  
16 “Preparation of Environmental Reports for Nuclear Power Plant License Renewal Applications”  
17 (NRC 2024-TN10280), as (1) information that identifies a significant environmental impact issue  
18 that was not considered or addressed in the LR GEIS and, consequently, not codified in  
19 Table B-1, in Appendix B to Subpart A of 10 CFR Part 51 (TN10253) or (2) information not  
20 considered in the assessment of impacts evaluated in the LR GEIS leading to a picture of the  
21 environmental consequences of the action that is significantly different than previously  
22 considered, such as an environmental impact finding different from that codified in Table B-1.  
23 Further, a significant environmental issue includes, but is not limited to, any new activity or  
24 aspect associated with the nuclear power plant that can act upon the environment in a manner  
25 or with an intensity and/or scope (context) not previously recognized.

26 In accordance with 10 CFR 51.53(c) (TN10253), “Operating License Renewal Stage,” the  
27 applicant’s ER must analyze the Category 2 (site-specific) issues in Table B-1 of 10 CFR  
28 Part 51, Subpart A, Appendix B. Additionally, the applicant’s ER must discuss actions to  
29 mitigate any adverse impacts associated with the proposed action and environmental impacts of  
30 alternatives to the proposed action. In accordance with 10 CFR 51.53(c)(3), the applicant’s ER  
31 does not need to analyze any Category 1 issues unless there is new and significant information  
32 about a specific issue.

33 NUREG-1555, Supplement 1, Revision 2, “Standard Review Plans for Environmental Reviews  
34 for Nuclear Power Plants for Operating License Renewal,” describes the NRC process for  
35 identifying new and significant information (NRC 2024-TN10251). The search for new  
36 information includes:

- 37 • review of the applicant’s ER (Dominion 2023-TN10387) and process for discovering and  
38 evaluating the significance of new information
- 39 • review of public comments
- 40 • review of environmental quality standards and regulations
- 41 • coordination with Federal, State, and local environmental protection and resource agencies
- 42 • review of technical literature as documented through this SEIS

1 New information that the NRC staff discovers is evaluated for significance using the criteria set  
2 forth in the LR GEIS and in NUREG-1555. For Category 1 issues in which new and significant  
3 information is identified, reconsideration of the conclusions for those issues is limited in scope to  
4 assessment of the new and significant information relevant to the proposed action; the scope of  
5 the assessment does not include other facets of an issue that the new information does not  
6 affect.

7 The NRC staff reviewed the discussion of environmental impacts associated with operation  
8 during the SLR term in the LR GEIS and has conducted its own independent review to identify  
9 new and significant issues for the V.C. Summer SLR application environmental review. The  
10 assessment of new and significant information for each resource is addressed in each resource  
11 area discussion.

## 12 **3.15 Impacts Common to All Alternatives**

13 This section describes the impacts that the NRC staff considers common to all alternatives  
14 discussed in this SEIS, including the proposed action and replacement power alternatives. In  
15 addition, the following sections discuss the termination of operations, the decommissioning of a  
16 power plant and potential replacement power facilities, and GHG emissions and climate change.

### 17 **3.15.1 Fuel Cycle**

18 This section describes the environmental impacts associated with the fuel cycles of both the  
19 proposed action and all replacement power alternatives that are analyzed in detail in this section  
20 of the SEIS.

#### 21 *3.15.1.1 Uranium Fuel Cycle*

22 The uranium fuel cycle includes uranium mining and milling, the production of uranium  
23 hexafluoride, isotopic enrichment, fuel fabrication, reprocessing of irradiated fuel, transportation  
24 of radioactive materials, and management of low-level wastes and high-level wastes related to  
25 uranium fuel cycle activities. Section 4.14.1 of the LR GEIS describes in detail the generic  
26 potential impacts of the radiological and nonradiological environmental impacts of the uranium  
27 fuel cycle and transportation of nuclear fuel and wastes (NRC 2024-TN10161). The NRC staff  
28 incorporates the information in the LR GEIS, Section 4.14.1 (NRC 2024-TN10161: pp. 4-150  
29 through 4-164), here by reference. The LR GEIS does not identify any plant-specific  
30 (Category 2) uranium fuel cycle issues.

31 As stated in the 2024 LR GEIS (NRC 2024-TN10161), the generic issues related to the uranium  
32 fuel cycle as identified in Table 3-1 of this SEIS would not be affected by continued operations  
33 associated with SLR. The NRC staff identified no new and significant information for these  
34 issues. Thus, as concluded in the LR GEIS, the impacts of generic issues related to the uranium  
35 fuel cycle would be SMALL.

#### 36 *3.15.1.2 Replacement Power Alternatives Fuel Cycles*

37 Uranium fuel cycle impacts for a nuclear plant result from the initial extraction of fuel, transport  
38 of fuel to the facility, and management and ultimate disposal of spent fuel. The environmental  
39 impacts of the uranium fuel cycle are referenced above in Section 3.15.1.1 of this SEIS, and  
40 discussed in more detail in Section 3.14.1 and Appendix D, Section D.4.12.2 of the LR GEIS  
41 (NRC 2024-TN10161).

1    3.15.1.2.1 *Fossil Fuel Energy Alternatives*

2    Fuel cycle impacts for a fossil fuel-fired power plant result from the initial extraction of fuel,  
3    cleaning and processing of fuel, transport of fuel to the facility, and management and ultimate  
4    disposal of any solid wastes from fuel combustion. These impacts are discussed in more detail  
5    in Appendix D, Section D.4.12.1 of the LR GEIS (NRC 2024-TN10161) and can generally  
6    include the following: significant changes to land use and visual resources; impacts on air  
7    quality, including release of criteria pollutants, fugitive dust, volatile organic compounds, and  
8    methane into the atmosphere; noise impacts; geology and soil impacts caused by land  
9    disturbances and mining; water resource impacts, including degradation of surface water and  
10   groundwater quality; ecological impacts, including loss of habitat and wildlife disturbances;  
11   historic and cultural resource impacts within the mine or pipeline footprint associated with the  
12   extraction of the fuel; socioeconomic impacts from employment of both the mining workforce  
13   and service and support industries; environmental justice impacts; health impacts on workers  
14   from exposure to airborne dust and methane gases; and generation of industrial wastes.

15   3.15.1.2.2 *Renewable Energy Alternatives*

16   For renewable energy technologies that rely on the extraction of a fuel source (e.g., biomass),  
17   such alternatives may have fuel cycle impacts with some similarities to those associated with  
18   the uranium fuel cycle. However, as stated in Appendix D, Section D.4.12.3 of the LR GEIS  
19   (NRC 2024-TN10161) (under “Renewable Alternatives”), the fuel cycles for renewable  
20   technologies such as wind, solar, geothermal, and ocean wave and current are difficult to  
21   define. This is because the associated natural resources exist regardless of any effort to harvest  
22   them for electricity production. Impacts from the presence or absence of these renewable  
23   energy technologies are often difficult to determine (NRC 2024-TN10161).

24   **3.15.2 Termination of Nuclear Power Plant Operations and Decommissioning**

25   This section of the SEIS addresses the environmental impacts of the V.C. Summer SLR  
26   associated with the termination of operations and the decommissioning of a nuclear power plant  
27   and replacement power alternatives. All operating nuclear power plants will terminate operations  
28   and be decommissioned at some point after the end of their operating life or after a decision is  
29   made to cease operations. For the proposed action at V.C. Summer, SLR could delay this  
30   eventuality for an additional 20 years beyond the current license period.

31   3.15.2.1 *Existing Nuclear Power Plant*

32   The decommissioning process begins when a licensee informs the NRC that it has permanently  
33   ceased reactor operations, defueled, and intends to decommission the nuclear plant. The  
34   licensee may also notify the NRC of the permanent cessation of reactor operations prior to the  
35   end of the license term. Consequently, most nuclear plant activities and systems dedicated to  
36   reactor operations would cease after reactor shutdown. The environmental impacts of  
37   decommissioning a nuclear power plant are evaluated NUREG-0586, *Generic Environmental*  
38   *Impact Statement on Decommissioning of Nuclear Facilities: Supplement 1, Regarding the*  
39   *Decommissioning of Nuclear Power Reactors* (NRC 2002-TN665). Additionally, Section 4.14.2.1  
40   of the 2024 LR GEIS (NRC 2024-TN10161) summarizes the incremental environmental impacts  
41   associated with nuclear power plant decommissioning activities. As noted in Table 3-1, there is  
42   one Category 1 issue, “Termination of Nuclear Power Plant Operations and Decommissioning,”  
43   applicable to V.C. Summer decommissioning following the SLR term. The LR GEIS did not  
44   identify any plant-specific (Category 2) decommissioning issues.

1 3.15.2.2 *Replacement Power Plants*

2 3.15.2.2.1 *New Nuclear and Fossil Fuel Alternatives*

3 The environmental impacts from the termination of power plant operations and the  
4 decommissioning of a power generating facility are dependent on the facility's decommissioning  
5 plan. Decommissioning plans generally outline the actions needed to restore the site to a  
6 condition equivalent in character and value to the site on which the facility was first constructed.  
7 General elements and requirements for a thermoelectric power plant decommissioning plan can  
8 include the removal of structures below grade, the removal of all accumulated waste materials,  
9 the removal of intake and discharge structures, and the cleanup and remediation of incidental  
10 spills and leaks at the facility.

11 The environmental consequences of decommissioning can generally include the following:

- 12 • short-term impacts on air quality and noise from the deconstruction of facility structures
- 13 • short-term impacts on land use and visual resources
- 14 • long-term reestablishment of vegetation and wildlife communities
- 15 • socioeconomic impacts caused by decommissioning the workforce and the long-term loss of  
16 jobs
- 17 • elimination of health and safety impacts on operating personnel and the general public

18 These impacts are representative of those associated with decommissioning any thermoelectric  
19 power generating facility. Activities that are unique to the termination of operations and the  
20 decommissioning of a nuclear power generating facility include the safe removal of the facility  
21 from service, the reduction of residual radioactivity to a level that permits the release of the  
22 property under restricted conditions or unrestricted use, and the termination of the license.

23 3.15.2.2.2 *Renewable Energy Alternatives*

24 The termination of power plant operation and decommissioning for renewable energy facilities  
25 would generally be similar to the activities and impacts discussed above for the new nuclear and  
26 fossil fuel alternatives. Decommissioning would involve the removal of facility components and  
27 any operational wastes and residues, if present, to restore sites to a condition equivalent in  
28 character and value to the site on which the facility was first constructed. In other  
29 circumstances, supporting infrastructure (e.g., buried utilities and pipelines) could be abandoned  
30 in place (NRC 2024-TN10161). The range of possible decommissioning considerations and  
31 impacts, depending on the renewable energy alternative considered, are discussed in  
32 Appendix D, Section D.4.13.3 of the LR GEIS (NRC 2024-TN10161). The NRC staff  
33 incorporates the information in the LR GEIS, Section D.4.13.3 (NRC 2024-TN10161: pp. D-45  
34 and D-46), herein by reference.

35 **3.15.3 Greenhouse Gas Emissions and Climate Change**

36 3.15.3.1 *Greenhouse Gas Emissions from the Proposed Action and Alternatives*

37 Gases found in the Earth's atmosphere that trap heat and play a role in the Earth's climate are  
38 collectively termed GHGs. These GHGs include CO<sub>2</sub>, methane (CH<sub>4</sub>), nitrous oxide, water  
39 vapor, and fluorinated gases, such as hydrofluorocarbons, perfluorocarbons, and sulfur  
40 hexafluoride. The Earth's climate responds to changes in concentrations of GHGs in the

1 atmosphere because these gases affect the amount of energy absorbed and heat trapped by  
 2 the atmosphere. Increasing concentrations of GHGs in the atmosphere generally increase the  
 3 Earth’s surface temperature. Atmospheric concentrations of CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O have  
 4 significantly increased since 1850 (IPCC 2013-TN7434, IPCC 2021-TN7435). For instance,  
 5 since 1850, CO<sub>2</sub> concentrations have increased by almost 50 percent (USGCRP 2023-TN9762).  
 6 In 2019, atmospheric concentrations of CO<sub>2</sub> (measured at 410 parts per million) were higher  
 7 than any time in at least 2 million years (IPCC 2023-TN8557). The annual rate of increase in  
 8 atmospheric CO<sub>2</sub> over the last 60 years is 100 times faster than previous natural increases  
 9 (USGCRP 2023-TN9762).

10 Long-lived GHGs—CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, and fluorinated gases—are well mixed throughout the  
 11 Earth’s atmosphere, and their impact on climate is long-lasting and cumulative in nature as a  
 12 result of their long atmospheric lifetimes (EPA 2016-TN7561). Therefore, the extent and nature  
 13 of climate change is not specific to where GHGs are emitted. CO<sub>2</sub> is of primary concern for  
 14 global climate change because it is the primary gas emitted as a result of human activities. In  
 15 2019, global net GHG emissions were estimated to be 59 ± 6.6 gigatons of CO<sub>2</sub> equivalents  
 16 (CO<sub>2</sub>eq), with the largest share in gross GHG emissions being CO<sub>2</sub> from fossil fuels combustion  
 17 and industrial processes (IPCC 2023-TN8557).

18 The operation of V.C. Summer results in direct and indirect GHG emissions. Dominion  
 19 calculated GHG emissions from stationary and portable combustion onsite sources and indirect  
 20 emission sources (workforce commuting). GHG emissions generated from operation of  
 21 V.C. Summer are presented in Table 3-24. Fluorinated gas emissions from refrigerant sources  
 22 and from electrical transmission and distribution systems can result from leakage, servicing,  
 23 repair, or disposal of sources. In addition to being GHGs, chlorofluorocarbons and  
 24 hydrochlorofluorocarbons are ozone-depleting substances that are regulated by the CAA under  
 25 Title VI, “Stratospheric Ozone Protection.” Dominion maintains a program to manage stationary  
 26 refrigeration appliances at the plant to recycle, recapture, and reduce emissions of  
 27 ozone-depleting substances and is in compliance with Section 608 of the CAA. Section 608 of  
 28 the CAA (40 CFR 82.154-TN10849) prohibits the intentional venting of ozone-depleting  
 29 substances while maintaining, servicing, repairing or disposing of air conditioning or refrigeration  
 30 equipment. Dominion uses sulfur hexafluoride in breakers within the switchyards and the turbine  
 31 building. The breakers are sealed, continuously monitored and inspected for leaks (Dominion  
 32 2024-TN10391). Dominion did not identify fugitive emission to report associated with sulfur  
 33 hexafluoride (Dominion 2024-TN10391). Consequently, fluorinated gas emissions are not  
 34 included in Table 3-24.

35 **Table 3-24 Annual Greenhouse Gas Emissions from Operations at Virgil C. Summer**  
 36 **Nuclear Station, Unit 1**

Emission Source	Carbon Dioxide Equivalents (tons)
Combustion Sources <sup>(a)</sup>	2,700
Workforce Commuting <sup>(b)</sup>	4,700

(a) Combustion sources include diesel generators and an auxiliary boiler. Greenhouse gas emissions for the diesel generators are based on maximum runtime (500 hours) and U.S. Environmental Protection Agency Compilation of Air Pollutant Emission Factors (AP-42). The auxiliary boiler is used only during outages and greenhouse gas emissions are estimated based on fuel usage and U.S. Environmental Protection Agency’s Emission factors for Greenhouse Gas Inventories.

(b) Emissions assume 923 passenger vehicles per day based on 6.69 percent carpool rate and 989 employees.

Sources: Dominion 2023-TN10387, Dominion 2024-TN10391.

1    3.15.3.1.1 *Proposed Action*

2    As described in the 2024 LR GEIS (NRC 2024-TN10161) and as cited in Table 3-1 of this SEIS,  
3    the GHG impacts on climate change from continued operations would be SMALL. The NRC  
4    staff did not identify any new and significant information that would change the conclusion in the  
5    LR GEIS. GHG emissions from routine operations at V.C. Summer include diesel generators,  
6    auxiliary boiler, as well as mobile sources and are minor. Dominion does not anticipate future  
7    upgrades or replacement activities of emission sources during the SLR term to support plant  
8    operation that could result in a significant increase in GHG emissions. Thus, as concluded in the  
9    LR GEIS, for the “Greenhouse gas impacts on climate change” generic issue, the impacts of  
10   continued operation of V.C. Summer on climate change would be SMALL.

11   3.15.3.1.2 *No-Action Alternative*

12   Under the no-action alternative, the NRC would not issue the renewed license, and  
13   V.C. Summer would permanently shut down on or before the expiration of the current license. At  
14   some point, all nuclear power plants will terminate operations and undergo decommissioning.  
15   The decommissioning GEIS (NRC 2002-TN7254) considers the environmental impacts of  
16   decommissioning. The scope of impacts considered under the no-action alternative includes the  
17   immediate impacts resulting from activities at V.C. Summer that would occur between plant  
18   shutdown and the beginning of decommissioning (i.e., activities and actions necessary to cease  
19   operation of V.C. Summer). When the facility stops operating, a reduction in GHG emissions  
20   from activities related to plant operation, such as the use of generators and employee vehicles  
21   would occur. The NRC staff anticipates that GHG emissions for the no-action alternative would  
22   be less than those presented in Table 3-24, which shows the estimated direct GHG emissions  
23   from operation of V.C. Summer and associated mobile emissions. Therefore, the NRC  
24   concludes that the impacts of the no-action alternative on climate change would be SMALL.

25   3.15.3.1.3 *Natural Gas Combined Cycle Plant*

26   The plant would have a design capacity of 1,110 MWe generation and 87 percent capacity  
27   factor. The 2013 LR GEIS (NRC 2013-TN2654) presents life-cycle GHG emissions associated  
28   with natural gas power generation. Life-cycle GHG emissions from natural gas power  
29   generation can range from 120 to 930 grams of carbon equivalent per kilowatt hour. GHG  
30   emission sources during construction would be similar to construction of an industrial facility and  
31   include construction equipment, engine exhaust, and workforce commuting. Applying emission  
32   factors developed by the DOE’s National Energy Technology Laboratory (2012-TN9604) for  
33   plant construction of natural gas combustion cycle, the NRC staff estimates that construction of  
34   the natural gas alternative would emit approximately 2,950 tons of CO<sub>2</sub>eq (2,670 MT).

35   The NRC staff estimates that the natural gas alternative would emit 3.6 million tons of CO<sub>2</sub>eq  
36   (3.3 MT of CO<sub>2</sub>eq). As can be seen from Table 3-25, if V.C. Summer’s generating capacity were  
37   to be replaced by a natural gas alternative, there would be a significant increase in GHG  
38   emissions. Additionally, GHG emission of a natural gas alternative has the highest emissions of  
39   all the alternatives considered. Therefore, given the potential for a significant increase in GHG  
40   emissions, the NRC staff concludes that the impacts of natural gas alternative on climate  
41   change would be MODERATE.

1    3.15.3.1.4 *New Nuclear (Small Modular Reactor) Alternative*

2    The new nuclear alternative would consist of two, 12-unit SMRs. The 2013 LR GEIS (NRC  
3    2013-TN2654) discusses life-cycle GHG emissions associated with nuclear power generation.  
4    Life-cycle GHG emissions from nuclear power generation can range from 1 to 288 grams of  
5    carbon equivalent per kilowatt hour. The nuclear life-cycle consists of the uranium fuel cycle  
6    phases, nuclear plant construction, operation, and decommissioning. GHG emission sources  
7    during construction would include equipment used, engine exhaust, and workforce commuting.  
8    GHG emissions would vary depending on the construction duration and equipment usage. In  
9    NUREG-2226, the NRC staff estimated that construction of two or more small modular reactors  
10   with maximum total electrical output of 800 MWe over the course of a 7-year period from  
11   equipment usage would result in a total of 42,990 tons (39,000 MT) of CO<sub>2</sub>eq (NRC 2019-  
12   TN6136). The NRC estimates that GHG emissions from construction of the new nuclear  
13   alternative would be similar in magnitude and approximately 59,110 tons (53,620) of CO<sub>2</sub>eq.

14   Sources of GHG emissions of the new nuclear portion from operations would include diesel  
15   generators, boilers, and pumps, similar to the existing sources at V.C. Summer. In  
16   NUREG-2226, the NRC estimated the total carbon footprint as a result of operating two or more  
17   SMRs with a maximum total electrical output of 800 MWe (NRC 2019-TN6136). In  
18   Section 5.7.1.2, of NUREG-2226 (p. 5-45) the NRC estimated that the carbon footprint for  
19   operations to be 4,990 tons of CO<sub>2</sub>eq annually (4,525 MT). Therefore, the NRC staff estimates  
20   that a new nuclear alternative would be approximately 6,000 tons (5,440 MT). If V.C. Summer's  
21   generating capacity were to be replaced by the new nuclear alternative, GHG would be of  
22   similar magnitude and there would not be a significant increase in GHG emissions (see  
23   Table 3-25). Therefore, the NRC concludes that the impacts of a new nuclear alternative on  
24   climate change would be SMALL.

25   3.15.3.1.5 *Natural Gas and Solar Combination Alternative*

26   The natural gas and solar combination alternative would consist of a natural gas combined cycle  
27   plant and solar with battery storage. The 2013 LR GEIS (NRC 2013-TN2654) discusses life-  
28   cycle GHG emissions associated with natural gas power generation and solar power  
29   generation. Life-cycle GHG emissions from natural gas power generation can range from 120 to  
30   930 grams of carbon equivalent per kilowatt hour and from solar power can range from 5 to 217  
31   grams of carbon equivalent per kilowatt hour. GHG emission sources during construction of the  
32   natural gas and solar combination alternative would be similar to construction of an industrial  
33   facility and include construction equipment, engine exhaust, and workforce commuting. Applying  
34   emission factors developed by the DOE's National Energy Technology Laboratory (2012-  
35   TN9604) for plant construction of natural gas combustion cycle, the NRC staff estimates that  
36   construction of the natural gas portion of the combination alternative would emit approximately  
37   1,860 tons of CO<sub>2</sub>eq (1,690 MT). The NREL estimates that the upstream processes from solar  
38   PV (material production, system and plant component manufacturing, installation and plant  
39   construction) is responsible for 60–70 percent of life-cycle GHG emissions (2012-TN10546).  
40   Facility construction is responsible for 19 percent of solar PV lifecycle emissions (Nuget and  
41   Sovacool 2014-TN10553).

42   GHG emission associated with operation of the solar with battery storage portion would be  
43   negligible because no direct fossil fuels are burned to generate electricity. Therefore, for this  
44   alternative, GHG emissions primarily be from the natural gas combined cycle plant. The NRC  
45   staff estimates that a 700 MW natural gas cycle plant with an 87 percent capacity factor would  
46   result in 2.3 million tons of CO<sub>2</sub>eq (2.1 MT tons of CO<sub>2</sub>eq). As can be seen from Table 3-25  
47   below, if V.C. Summer's generating capacity were to be replaced by a natural gas and solar



1 combination alternative there would be a significant increase in GHG emissions. Therefore,  
2 given the potential for a significant increase in GHG emissions, the NRC staff concludes that the  
3 impacts of natural gas and solar combination alternative on climate change would be  
4 MODERATE.

### 5 3.15.3.1.6 *New Nuclear and Solar Combination*

6 The new nuclear and solar combination alternative would consist of one 12-unit SMR plant and  
7 solar with battery storage. The 2013 LR GEIS (NRC 2013-TN2654) discusses life-cycle GHG  
8 emissions associated with nuclear power generation and solar power generation. Life-cycle  
9 GHG emissions from nuclear power generation can range from 1 to 288 grams of carbon  
10 equivalent per kilowatt hour and from solar power can range from 5 to 217 grams of carbon  
11 equivalent per kilowatt hour. GHG emission sources during construction of the new nuclear and  
12 solar combination alternative would be similar to construction of an industrial facility and include  
13 construction equipment, engine exhaust, and workforce commuting. In NUREG-2226, the NRC  
14 staff estimated that construction of two or more SMRs with maximum total electrical output of  
15 800 MWe over the course of a 7-year period from equipment usage would result in a total of  
16 42,990 tons (39,000 MT) of CO<sub>2</sub>eq (2019-TN6136). The NRC estimates that GHG emissions  
17 from construction of the new nuclear alternative would be similar in magnitude and  
18 approximately 47,500 tons (43,090 MT) of CO<sub>2</sub>eq. The National Renewable Energy Laboratory  
19 estimates that the upstream processes from solar PV (material production, system and plant  
20 component manufacturing, installation and plant construction) is responsible for 60–70 percent  
21 of life-cycle GHG emissions (2012-TN10546). Facility construction is responsible for 19 percent  
22 of solar PV life-cycle emissions (Nugent and Sovacool 2014-TN10553).

23 GHG emissions associated with operation of the solar with battery storage portion would be  
24 negligible because no direct fossil fuels are burned to generate electricity. Sources of GHG  
25 emissions of the new nuclear portion would include diesel generators, boilers, and pumps,  
26 similar to the existing sources at V.C. Summer. In NUREG-2226, the NRC estimated the total  
27 carbon footprint as a result of operating two or more SMRs with a maximum total electrical  
28 output of 800 MWe (2019-TN6136). In Section 5.7.1.2 of the NUREG-2226 (p. 5-45), the NRC  
29 estimated that the carbon footprint for operations to be 4,990 tons of CO<sub>2</sub>eq annually  
30 (4,525 MT). Therefore, the NRC staff estimates that the new nuclear portion of this combination  
31 alternative would be approximately 5,500 tons (4,990 MT). If V.C. Summer's generating  
32 capacity were to be replaced by new nuclear and solar combination alternative GHG would be  
33 of similar magnitude and there would not be a significant increase in GHG emissions (see  
34 Table 3-25 below). Therefore, the NRC concludes that the impacts of a new nuclear and solar  
35 power combination alternative on climate change would be SMALL.

### 36 3.15.3.2 *Climate Change*

37 Climate change is the decades or longer change in climate measurements (e.g., temperature  
38 and precipitation) that has been observed on a global, national, and/or regional level (IPCC  
39 2007-TN7421; EPA 2016-TN7561; USGCRP 2014-TN3472). Worldwide, 2023 was the warmest  
40 year on record and 2014–2023 was the warmest decade on record since thermometer-based  
41 observations began (EPA 2024-TN10205). Climate change research indicates that the cause of  
42 the Earth's warming over the last 50 to 100 years is due to the buildup of GHGs in the  
43 atmosphere resulting from human activities (IPCC 2013-TN7434, IPCC 2021-TN7435, IPCC  
44 2023-TN8557; USGCRP 2014-TN3472, USGCRP 2017-TN5848, USGCRP 2018-TN5847).  
45 Climate change can vary regionally, spatially, and seasonally, depending on local, regional, and  
46 global factors. Just as regional climate differs throughout the world, the impacts of climate  
47 change can vary among locations.

1 **Table 3-25 Direct Greenhouse Gas Emissions from Facility Operations of Virgil C.**  
 2 **Summer Nuclear Station Under the Proposed Action and Alternatives**

Technology/Alternative	Carbon Dioxide Equivalent <sup>(a)</sup> (T/yr)
Proposed Action <sup>(b)</sup>	2,700
No Action Alternative <sup>(c)</sup>	<2,700
Natural Gas Alternative	3.6 million
New Nuclear Alternative	6,000
Natural Gas and Solar Combination Alternative <sup>(d)</sup>	2.3 million
New Nuclear and Solar Combination Alternative <sup>(d)</sup>	5,500

- (a) Carbon dioxide equivalent (CO<sub>2</sub>eq) is a metric used to compare the emissions of greenhouse gases (GHGs) based on their global warming potential (GWP). The GWP is a measure used to compare how much heat a GHG traps in the atmosphere. The GWP is the total energy that a gas absorbs over a period of time compared to carbon dioxide. CO<sub>2</sub>eq is obtained by multiplying the amount of the GHG by the associated GWP.
- (b) GHG emissions include direct emissions from onsite combustion sources (e.g., emergency power generators).
- (c) Emissions resulting from activities at V.C. Summer that would occur between plant shutdown and the beginning of decommissioning and assumed not to be greater than GHG emissions from operation at V.C. Summer.
- (d) Direct air emissions associated with operation of the solar with battery storage portions of this alternative are negligible because no fossil fuels are burned to generate electricity.

3 **3.15.3.2.1 Observed Trends in Climate Change**

4 Global surface temperature has increased faster since 1970 than in any other 50-year period  
 5 over at least the last 2,000 years (IPCC 2023-TN8557). From 2011 through 2020, the global  
 6 surface temperature was 2°F (1.1°C) warmer than the preindustrial period (1850–1900) (IPCC  
 7 2023-TN8557). From 1901 to 2023, global precipitation has increased at an average rate of  
 8 0.03 in. (0.08 cm) per decade (EPA 2024-TN10205). From 1901 to 2023, average surface  
 9 temperature across the contiguous United States has increased by 0.17°F (0.09°C) per decade  
 10 (EPA 2024-TN10205). From 1901 to 2023, total annual precipitation in the contiguous United  
 11 States has increased as a rate of 0.18 in. (0.45 cm) per decade (EPA 2024-TN10205)

12 The United States Global Change Research Program (USGCRP) reports that since 1970, the  
 13 contiguous United States is warming at a faster rate than the global average. Since 1970, global  
 14 temperature has increased by 1.7°F (0.9°C) while average surface temperature in the  
 15 contiguous United States have increased by 2.5°F (1.4°C) (2023-TN9762). Observed climate  
 16 change indicators across the United States include increases in the frequency and intensity of  
 17 heavy precipitation, earlier onset of spring snowmelt and runoff, rise of sea level and increased  
 18 tidal flooding in coastal areas, an increased occurrence of heat waves, and a decrease in the  
 19 occurrence of cold waves. Average sea level rise along the continental U.S. coastline has risen  
 20 by about 11 in. (27 cm) over the last century and between 1993–2020 average sea level rose  
 21 1.8 in. (4.6 cm) per decade (USGCRP 2023-TN9762).

22 Climate change and its impacts can vary regionally, spatially, and seasonally, depending on  
 23 local, regional, and global factors. Observed climate changes and impacts have not been  
 24 uniform across the United States. Annual average temperature data in the Southeast (where  
 25 V.C. Summer is located) varies between 2002–2021 (relative to 1901–1960), with South  
 26 Carolina exhibiting an increase of 0.5–1.5°F (0.28–0.83°C) (USGCRP 2023-TN9762:  
 27 Figure 2.4). The number of hot days (days at or above 95°F [35°C]) has decreased by 9.7 days,  
 28 the number of cold days (days at or below 32°F [0°C]) has increased by 3.0 days, and the  
 29 number of warm nights (nights at or above 70°F [21°C]) have increased by 7.9 nights in the  
 30 Southeast from 2002–2021 relative to 1901–1960 (USGCRP 2023-TN9762: Figure 2.7).  
 31 Average annual precipitation from 2002–2021 (relative to the 1901–1960 average) for the

1 Southeast exhibits increases and decreases, with the northwestern portion of the South  
2 Carolina exhibiting a 0–10 percent decrease and the rest of South Carolina exhibiting an  
3 increase of 0 to 10 percent (USGCRP 2023-TN9762: Figure 2.4). The Southeast has  
4 experienced a 37 percent increase in the number of extreme precipitation days (defined as the  
5 top 1 percent of heaviest precipitation events) from 1958–2021 (USGCRP 2023-TN9762:  
6 Figure 2.8).

7 The NRC staff used the NOAA “Climate at a Glance” tool to analyze temperature and  
8 precipitation trends for the 1895–2023 period in the North Central climate division within South  
9 Carolina. A trend analysis shows that the average annual temperature has increased at a rate of  
10 0.1°F (0.05°C) per decade, and average precipitation has decreased by 0.13 in. (0.33 cm) per  
11 decade (NCEI 2024-TN10602). Figure 3-5 of this SEIS presents monthly average intake  
12 temperatures from 2006 to 2023 from the Monticello Reservoir. No notable trend over the  
13 18-year period is that apparent for monthly average intake temperatures.

#### 14 *3.15.3.2.2 Climate Change Projections*

15 Future global GHG emission concentrations (emission scenarios) and climate models are  
16 commonly used to project possible climate change. Climate model projections indicate that  
17 changes in climate will not be uniform across the United States. Climate model simulations often  
18 use GHG emission scenarios to represent possible future social, economic, technological, and  
19 demographic development that, in turn, drive future emissions. Climate models indicate that  
20 over the next decade, warming is very similar across all emission scenarios (USGCRP 2023-  
21 TN9762). However, by mid-century (2040–2070) differences between projected temperatures  
22 under higher and lower emission scenarios become observable. The impacts of climate change  
23 increase with warming, and warming is certain to continue if emissions of CO<sub>2</sub> do not reach net  
24 zero (USGCRP 2023-TN9762).

25 The Intergovernmental Panel on Climate Change (IPCC) has generated various representative  
26 concentration pathway (RCP) scenarios commonly used by climate modeling groups to project  
27 future climate conditions (IPCC 2000-TN7652, IPCC 2013-TN7434; USGCRP 2017-TN5848,  
28 USGCRP 2018-TN5847). In the IPCC Fifth Assessment Report, four RCPs were developed and  
29 are based on the predicted changes in radiative forcing (a measure of the influence that a factor  
30 such as GHG emissions has in changing the global balance of incoming and outgoing energy)  
31 in the year 2100, relative to preindustrial conditions. The four RCP scenarios are numbered in  
32 accordance with the change in radiative forcing measured in watts per square meter  
33 (i.e., +2.6 [very low], +4.5 [lower], +6.0 [mid-high], and +8.5 [higher]) (USGCRP 2018-TN5847).  
34 For example, RCP 2.6 is representative of a mitigation scenario aimed at limiting the increase in  
35 the global mean temperature to 3.6°F (2°C) (IPCC 2014-TN7651). RCP 8.5 reflects a continued  
36 increase in global emissions resulting in increased warming by 2100. In the IPCC Working  
37 Group contribution to the Sixth Assessment Report, five shared socioeconomic pathways  
38 (SSPs) were used along with the associated modeling results as the basis for the climate  
39 change assessments (IPCC 2021-TN7435). These five socioeconomic pathway scenarios  
40 (SSP1-1.9, SSP1-2.6, SSP2-4.5, SSP3-7.0, and SSP5-8.5) cover a range of GHG pathways  
41 and climate change mitigation.

42 The NRC staff considered the best available climate change studies performed by USGCRP as  
43 part of the staff’s assessment of potential climate change projections during the V.C. Summer  
44 SLR term (2042–2062). The Fourth National Climate Assessment relies on the four RCPs and  
45 presents projected climate change by geographic regions in the United States (USGCRP 2018-  
46 TN5847). The Fifth National Climate Assessment (USGCRP 2023-TN9762) uses SSPs, RCPs,

1 and global warming levels when presenting projected climate change. Global warming levels  
2 are used to describe the level of global temperature increase (e.g., 2.7°F or 1.5°C) relative to  
3 preindustrial temperature conditions (USGCRP 2023-TN9762).

4 Regional projections for annual mean temperature are available from the Fourth National  
5 Climate Assessment based on the RCP 4.5 and RCP 8.5 scenarios for the midcentury  
6 (2036–2065) as compared to the annual mean temperature for 1976–2005. The modeling  
7 predicts increases of 3.40 to 4.30°F (1.9–2.4°C) across the Southeast region by midcentury,  
8 with higher GHG emission scenarios leading to greater and faster temperature increases  
9 (USGCRP 2017-TN5848: Table 6.4). Specific to the portion encompassing South Carolina,  
10 predicted annual temperature increases range from 2–4°F (1.1–2.2°C) under the RCP 4.5, and  
11 2–6°F (1.1–3.3°C) under the RCP 8.5 scenarios (USGCRP 2017-TN5848: Figure 6.7). Under  
12 the RCP 8.5 scenario, the coldest and warmest daily temperatures of the year are expected to  
13 increase by 4.97°F and 5.69°F (2.76°C and 3.16°C), respectively, in the Southeast by  
14 midcentury (USGCRP 2017-TN5848: Table 6.5).

15 As for precipitation, projections based on the intermediate (RCP 4.5) emission scenarios for the  
16 mid-century (2036–2065), indicates spatial differences in annual mean precipitation changes  
17 across the southeast. For instance, across South Carolina annual mean precipitation will  
18 increase by 0.5–2 in. (1.3–5.1 cm) for the mid-century relative to the previous five decades  
19 (1991–2020) (USGCRP 2023-TN9762: Figure 4.3). The USGCRP predicts continued increases  
20 in the frequency and intensity of heavy precipitation events across the United States, including  
21 across the Southeast. Generally, extreme precipitation events are observed to increase by  
22 6–7 percent for each degree Celsius of temperature increase (USGCRP 2017-TN5848 and  
23 USGCRP 2023-TN9762). Increases in extreme precipitation, in turn, can increase annual runoff.

24 Decreases in average precipitation coupled with increases in extreme precipitation,  
25 temperatures, and evapotranspiration can result in increased aridity, more frequent droughts,  
26 and reduction in the average flow of rivers and streams (USGCRP 2018-TN5847; EPA 2023-  
27 TN8803). USGCRP reports that higher temperatures can cause a drought to develop or become  
28 more intense than would be expected from precipitation deficits alone (2023-TN9762).  
29 USGCRP defines drought as a mismatch between moisture supply and demand and driven by  
30 many climatic factors including temperature, potential evapotranspiration, soil moisture, or  
31 precipitation.

### 32 *3.15.3.2.3 Climate Change Impacts on Environmental Resources*

33 As described in the 2024 LR GEIS (NRC 2024-TN10161) and as cited in Table 3-2 of this SEIS,  
34 there is a Category 2 issue “Climate Change Impacts on Environmental Resources” applicable  
35 to V.C. Summer. According to the 2024 LR GEIS, the impacts of climate change on  
36 environmental resources during the SLR term are location-specific and cannot be generically  
37 evaluated. Changes in climate can have broad implications for certain resource areas. Climate  
38 change may impact the affected environment in a way that alters the environmental resources  
39 that are impacted by the proposed action (V.C. Summer SLR). In order for there to be a climate  
40 change impact on an environmental resource, the proposed action must have an incremental  
41 new, additive, or increased physical effect or impact on the resource or environmental condition  
42 beyond what is already occurring. Below, the NRC staff considers the effects of climate change  
43 on environmental resource areas that may also be directly affected by V.C. Summer continued  
44 operations during the SLR term.

1 The effects of climate change on V.C. Summer’s structures, systems, and components (SSCs)  
2 are outside the scope of this Category 2 issue for SLR. Site-specific environmental conditions  
3 are considered when siting nuclear power plants. This includes the consideration of  
4 meteorological and hydrologic siting criteria as set forth in 10 CFR Part 100 (TN282), “Reactor  
5 Site Criteria.” NRC regulations require that plant SSCs important to safety be designed to  
6 withstand the effects of natural phenomena, such as flooding, without loss of capability to  
7 perform their safety functions. Further, nuclear power plants are required to operate within  
8 technical specifications in accordance with the NRC operating license, including coping with  
9 natural phenomena hazards. The NRC conducts safety reviews prior to allowing licensees to  
10 make operational changes due to changing environmental conditions. Additionally, the NRC  
11 evaluates nuclear power plant operating conditions and physical infrastructure to ensure  
12 ongoing safe operations under the plant’s operating license through the NRC’s Reactor  
13 Oversight Program. If new information about changing environmental conditions (such as rising  
14 sea levels that threaten safe operating conditions or challenge compliance with the plant’s  
15 technical specifications) becomes available, the NRC will evaluate the new information to  
16 determine whether any safety-related changes are needed at licensed nuclear power plants.  
17 This is a separate and distinct process from the NRC staff’s SLR environmental review that it  
18 conducts in accordance with NEPA.

#### 19 Air Quality

20 Climate change can impact air quality as a result of changes in meteorological conditions. Air  
21 pollutant concentrations are sensitive to winds, temperature, humidity, and precipitation. Ozone  
22 levels and PM have been found to be particularly sensitive to climate change influences. Ozone  
23 is formed by the chemical reaction of NO<sub>x</sub> and volatile organic compounds in the presence of  
24 heat and sunlight. The emission of ozone precursors also depends on the temperature, wind,  
25 and solar radiation (IPCC 2007-TN7421). Warmer temperatures, air stagnation, droughts, and  
26 wildfires are favorable conditions for higher levels of ozone and PM<sub>2.5</sub> (USGCRP 2023-TN9762).  
27 In the Southeast, recent studies indicate that the position of the Bermuda High in the summer  
28 influences surface ozone in the eastern part of the United States (Zhang and Wang 2016-  
29 TN10554). As discussed in Section 3.3.2 of this SEIS, Fairfield County is designated in  
30 attainment for all NAAQS. USGCRP reports that there is medium confidence that climate  
31 change is projected to worsen air quality in many U.S. regions (2023-TN9762). This is due to  
32 the uncertainty in how meteorology will respond to climate change and how these  
33 meteorological conditions will in turn change air pollutant concentrations. Under the RCP 4.5  
34 emission scenario, East et al. 2024 (TN10550) found that by mid-century the average 1 year  
35 ozone concentrations may increase by 2 parts per billion (ppb) across most of the United  
36 States, including the Southeast, and the frequency of ozone levels of 70 ppb or higher for  
37 8 hours or longer days to increase. East et al. 2024 findings suggest that increasing the  
38 frequency of high ozone concentrations can increase the risk of not meeting NAAQS by  
39 mid-century in areas currently attaining them. However, as discussed in Section 3.3.2 of this  
40 SEIS, air emissions from V.C. Summer are minor and exempted from air permitting  
41 requirements as they are not expected to significantly contribute to violations in NAAQS.

#### 42 Surface Water Resources

43 Observational data and climate model projections both indicate changes in precipitation, runoff,  
44 and air temperature in South Carolina and the Southeast region that could influence surface  
45 water availability and water quality. Observations of precipitation and air temperature in South  
46 Carolina over the last two decades (2002–2021) compared to the 1901–1960 period show an  
47 increase in average annual temperature of 0.5-1.5 °F (0.27–0.83°C) and changes in annual  
48 average precipitation up to ±10 percent greater/lower than the historical baseline (USGCRP

1 2023-TN9762). Another relevant trend across the broader Southeast region has been a 37  
2 percent increase in extreme precipitation events (top 1 percent of heaviest precipitation events)  
3 over 1958–2021 (USGCRP 2023-TN9762: Figure 2.8), and the frequency and severity of  
4 extreme precipitation events are projected to continue to increase across the southeast,  
5 including South Carolina (USGCRP 2023-TN9762: Figure 2.12). Increases in annual  
6 precipitation and heavy precipitation can increase runoff and increase the potential for riverine  
7 flooding. Increased runoff and high-flow events can result in the transport of a higher sediment  
8 load and other contaminants to surface waters with potential degradation of ambient water  
9 quality.

10 The USGCRP does not identify aridification as a major concern for the Southeast (2023-  
11 TN9762: Chapter 2). However, changes in the amount and timing of precipitation and seasonal  
12 evapotranspiration could alter the seasonal balance of surface water supply and demand  
13 (USGCRP 2023-TN9762: Chapter 2). Precipitation projections for mid-century (2036–2065)  
14 under the intermediate emission scenarios (RCP 4.5) on an average show 0.5–2 in. (1.27–  
15 5.08 cm) increase in annual precipitation compared to 1991–2020 (USGCRP 2023-TN9762:  
16 Figure 4.3). Projections for runoff show a smaller increase than precipitation, with an estimate of  
17 0–0.5 in. (0– 1.27 cm) increase over the mid-century period for the RCP 4.5 scenarios and  
18 summer (June–August) soil moisture is estimated to slightly decrease 0–0.05 in. (0–0.127 cm)  
19 (USGCRP 2023-TN9762: Figure 4.6). Under an intermediate scenario (RCP 4.5), projected  
20 changes for South Carolina by mid-century (2036–2065, relative to 1991–2020) indicate an  
21 annual actual evapotranspiration increase of 0.5–2.0 in. (1.3–5.1 cm), average summer soil  
22 moisture decrease of 0–0.05 in. (0–0.12 cm), and annual climatic water deficit (defined as the  
23 shortfall of water necessary to fully supply vegetation requirements) increase of 0.0–0.5 in.  
24 (0–1.3 cm) (USGCRP 2023-TN9762: Figures 4.4, 4.6, 4.9). Climate change is also expected to  
25 increase the number of hot days ( $\geq 95^{\circ}\text{F}$  [ $\geq 35^{\circ}\text{C}$ ]) and the number of warm nights ( $\geq 70^{\circ}\text{F}$   
26 [ $\geq 21^{\circ}\text{C}$ ]) (USGCRP 2023-TN9762: Figure 2.11), both of which could increase surface water  
27 temperatures and evaporation, although monthly average intake water temperatures at  
28 Monticello Reservoir for the 2006–2023 period have not shown any increasing trends  
29 (Figure 3-5 of this SEIS). However, it should be noted that observations show a 9.7 day  
30 reduction in the number of hot days (days at or above  $95^{\circ}\text{F}$  [ $35^{\circ}\text{C}$ ]) in the Southeast for 2002–  
31 2021 compared to 1901–1960 (USGCRP 2023-TN9762: Figure 2.7). Regulatory agencies  
32 would need to account for changes in water availability in their water resources allocation as  
33 well as environmental permitting programs. Regardless of water use permitting constraints,  
34 nuclear power plant operators would have to account for any changes in water temperature in  
35 operational practices and procedures.

### 36 **3.16 Cumulative Effects of the Proposed Action**

37 Actions considered in the cumulative effects analysis include the incremental effects of the  
38 proposed SLR action when added to the environmental effects of other past, present, and  
39 reasonably foreseeable future actions. The analysis considers all actions including minor ones,  
40 because the effects of individually minor actions may be significant when considered collectively  
41 over a period of time. The goal of the cumulative effects analysis is to identify potentially  
42 significant environmental impacts. The environmental effects of the proposed SLR action when  
43 combined with the effects of other actions could result in a cumulative effect.

44 The cumulative effects analysis only considers resources and environmental conditions that  
45 could be affected by the proposed SLR action, including the effects of continued reactor  
46 operations during the SLR term and any refurbishment activities at a nuclear power plant. For  
47 there to be a cumulative effect, the proposed action (i.e., V.C. Summer SLR) must have an

1 incremental new, additive, or increased physical effect or impact on the resource or  
2 environmental condition beyond what is already occurring.

3 For the purposes of analysis, past and present actions include all actions that have occurred  
4 since the commencement of reactor operations up to the submittal of the SLR application. Older  
5 actions are accounted for in baseline assessments presented in the affected environment  
6 discussions in Sections 3.2 through 3.13. The time frame for the consideration of reasonably  
7 foreseeable future actions is the SLR term. Reasonably foreseeable future actions include  
8 current and ongoing planned activities at V.C. Summer through the end of the SLR period.

9 The incremental effects of the proposed action (V.C. Summer SLR) when added to the effects  
10 from past, present, and reasonably foreseeable future actions and other actions result in the  
11 overall cumulative effect. A qualitative cumulative effects analysis is conducted in instances  
12 where the incremental effects of the proposed action and past, present, and reasonably  
13 foreseeable future actions are uncertain or not well known.

14 Information from Dominion's ER; responses to requests for additional information; information  
15 from other Federal, State, and local agencies; scoping comments; and information gathered  
16 during the environmental site audit at V.C. Summer were used to identify past, present, and  
17 reasonably foreseeable future actions in the cumulative effects analysis.

18 According to Dominion, V.C. Summer SLR would not require any refurbishment or ISFSI  
19 expansion for additional spent fuel storage.

20 SCE&G Company submitted an application in 2008 requesting combined licenses for  
21 V.C. Summer Units 2 and 3. This request was terminated in 2019. The only other past action  
22 near V.C. Summer was the decommissioning of a firing range adjacent to the Broad River.  
23 Decommissioning work was conducted in 2020, with a termination notice filed for the NPDES  
24 land disturbance permit in 2021. Decommissioning of the firing range has since been  
25 completed.

### 26 **3.16.1 Air Quality**

27 The region of influence that the NRC staff considered in the cumulative air quality analysis  
28 consists of Fairfield County because air quality designations in South Carolina are made at the  
29 county level. Dominion has not proposed any refurbishment activities during the SLR term. As a  
30 result, the NRC staff expects that air emissions and sources from the nuclear power plant during  
31 the SLR term would be similar to those presented in Section 3.3.2 of this SEIS. Consequently,  
32 cumulative impacts to air quality in Fairfield County would be the result of future projects and  
33 actions that change present-day emissions within the county. Decommissioning of the former  
34 firing range may have resulted in temporary and localized air emissions from demolition  
35 activities.

### 36 **3.16.2 Water Resources**

#### 37 *3.16.2.1 Surface Water Resources*

38 The description of the affected environment in Section 3.5.1 of this SEIS ("Surface Water  
39 Resources") provides the basis for the cumulative impacts assessment for surface water  
40 resources. V.C. Summer withdraws cooling water from the Monticello Reservoir, which is also  
41 the sink for cooling water discharge from V.C. Summer's once-through cooling system and

1 receives the majority of plant effluent. Permit No. 20PN001 allows V.C. Summer to withdraw up  
2 to 26,243.86 MGM for cooling and plant operations. While V.C. Summer does not directly  
3 withdraw water from other surface water bodies, diversions from the Broad River, located 1 mi  
4 (1.6 km) west of the Monticello Reservoir (see Figure 2-2 of this SEIS), are the primary source  
5 of water for maintaining storage in the Monticello Reservoir. The Broad River is a major river in  
6 South Carolina. The lowest recorded mean daily flow 1.2 mi (1.9 km) downstream of the Parr  
7 Reservoir over the last 43 years (1980–2023) was 48.3 cfs (1.37 m<sup>3</sup>/s) (USGS 2024-TN10403),  
8 while the lowest mean of mean daily flow (lowest mean flow for a specific day of the year) was  
9 2,200 cfs (62.3 m<sup>3</sup>/s) (USGS 2024-TN10517) and the lowest 5th percentile daily flow was  
10 238 cfs (6.74 m<sup>3</sup>/s) (USGS 2024-TN10518). As discussed in Section 3.5.3.1 of this SEIS, FERC  
11 requires the Parr Hydroelectric Project be operated, including minimum flow, in accordance with  
12 an Adaptive Management Plan (FERC 2020-TN10536). Previously, FERC did not express any  
13 concerns with the operations of V.C. Summer and its impacts on minimum flow in the Broad  
14 River (NRC 2004-TN7262).

15 The Monticello Reservoir serves the dual purpose as the source of surface water for  
16 V.C. Summer and as the upper storage reservoir for the Fairfield Pumped Storage Project. The  
17 pumped storage project generates hydroelectric power by releasing water from the Monticello  
18 Reservoir to the lower Parr Shoals Reservoir during peak power demand periods. Storage in the  
19 Monticello Reservoir is replenished during non-peak demand periods, with up to 29,000 ac-ft  
20 transferred between the lower and upper reservoirs each day. The Monticello Reservoir is a  
21 large reservoir with 431,000 ac-ft of storage (Dominion 2023-TN10387). Consumptive use from  
22 evaporative losses, which constitute the majority of V.C. Summer's consumptive demand, is  
23 estimated at 14.3 MGD (44 ac-ft/day or 22 cfs) (Dominion 2023-TN10387). Dominion has not  
24 identified any SLR-related refurbishment activities and has not proposed to increase surface  
25 water withdrawals or consumptive use during the SLR term. No new or proposed projects with  
26 the potential to substantially impact surface water withdrawals or consumptive water use within  
27 the reach of the Broad River where V.C. Summer is located were identified during the review.

28 Discharges from V.C. Summer are regulated under current SCDHEC NPDES Permit No.  
29 SC0030856 (Dominion 2023-TN10387). The NPDES permit requires daily maximum discharge  
30 temperature to be less than 113°F [45°C]), but there are no limits on the intake temperature or  
31 the maximum difference between intake and discharge temperatures. SCDHEC would be  
32 expected to alter NPDES discharge conditions, as necessary, to protect the water quality of the  
33 Monticello Reservoir. Under the CWA, the NRC cannot issue a Federal permit or license unless  
34 the CWA Section 401 water quality certification has been issued or the water quality certification  
35 requirement has been waived by a State or another authorized agency. The SCDHEC approved  
36 a Section 401 waiver request for V.C. Summer on August 4, 2022 (Dominion 2023-TN10387).  
37 V.C. Summer will continue operating under the current and future renewed SCDHEC permits  
38 during the SLR period and will also continue to implement its SWPPP and spill prevention  
39 control and countermeasures plan. Moreover, any offsite projects would similarly have to  
40 comply with SCDHEC regulations. Dominion does not anticipate any dredge-and-fill activities  
41 during the SLR term (2023-TN10387). While several of the local water bodies do not meet water  
42 quality standards and are listed as impaired by SCDHEC, V.C. Summer does not contribute to  
43 these impairments. In summary, a substantial regulatory framework exists to address current  
44 and future water quality and water use considerations. Therefore, the proposed action would  
45 have no cumulative effect beyond what is already being experienced.



1    3.16.2.2   *Groundwater Resources*

2    The description of the affected environment in Section 3.5.2 of this SEIS (“Groundwater  
3    Resources”) serves as the baseline for the cumulative impacts assessment for groundwater  
4    resources. V.C. Summer does not withdraw groundwater for plant use (e.g., operational needs,  
5    drinking water, sanitation, or irrigation/grounds maintenance). As described in Section 3.5.2.1,  
6    the site utilizes a dewatering system to prevent groundwater ingress to building foundations.  
7    The system discharges to two, onsite stormwater outfalls. Based on groundwater elevation  
8    contour data and the estimated rate of dewatering during steady-state flow, the radius of  
9    influence of the system is likely to be within the plant boundary. Groundwater withdrawal at the  
10   site is not anticipated to significantly increase during the proposed SLR operating term. The flow  
11   of groundwater within onsite aquifers is toward tributaries of the Broad River, to the south and  
12   southwest of the plant. As described in Section 3.5.2.2, the majority of registered groundwater  
13   users within the site's vicinity or located to the east or northeast of the site center, further limiting  
14   the potential for any noticeable cumulative groundwater use impacts.

15   Although tritium has been detected in onsite groundwater, levels do not exceed the EPA’s MCL  
16   for tritium. V.C. Summer will continue to implement its groundwater protection program and spill  
17   prevention control plans to reduce groundwater quality impacts. Based on this information, the  
18   proposed action would have no cumulative impacts beyond those identified in Section 3.5.3.2.

19   **3.16.3   Socioeconomics**

20   As discussed in Section 3.10.7 of this SEIS, continued operation of V.C. Summer during the  
21   SLR term would have no impact on socioeconomic conditions in the region beyond what is  
22   already being experienced. Dominion has no planned activities at V.C. Summer beyond  
23   continued reactor operations and maintenance.

24   Because Dominion has no plans to hire additional workers during the SLR term, overall  
25   expenditures and employment levels at V.C. Summer would remain unchanged and there would  
26   be no new or increased demand for housing and public services. Therefore, the only  
27   contributory effects would come from reasonably foreseeable future planned operational  
28   activities at V.C. Summer and other planned offsite activities, unrelated to the proposed action.  
29   When combined with past, present, and reasonably foreseeable future activities, the proposed  
30   action would have no new or increased effect beyond what is currently being experienced.

31   **3.16.4   Human Health**

32   The NRC and the EPA have established radiological dose limits to protect the public and  
33   workers from both acute and long-term exposure to radiation and radioactive materials. These  
34   dose limits are specified in 10 CFR Part 20 (TN283) and 40 CFR Part 190, “Environmental  
35   Radiation Protection Standards for Nuclear Power Operations” (TN739). As discussed in  
36   Section 3.11 of this SEIS, “Human Health,” the impacts on human health from continued nuclear  
37   power plant operations during the SLR term would be SMALL.

38   For the purposes of this cumulative impact analysis, the geographical area considered is the  
39   area within a 50 mi (80 km) radius of V.C. Summer. There are no other operational nuclear  
40   power plants within this 50 mi (80 km) radius. As discussed in Section 3.13.1 of this SEIS,  
41   “Radioactive Waste,” Dominion stores spent nuclear fuel from V.C. Summer in a storage pool  
42   and in an onsite ISFSI. Per the V.C. Summer ER (Dominion 2023-TN10387), the ISFSI is

1 designed to store the spent fuel generated over 80 years of operation, so no expansion is  
2 planned during the period of extended operation.

3 The EPA regulations at 40 CFR Part 190 (TN739) limit the dose to members of the public from  
4 all sources in the nuclear fuel cycle, including nuclear power plants, fuel fabrication facilities,  
5 waste disposal facilities, and transportation of fuel and waste. As discussed in Section 3.13 of  
6 this SEIS, Dominion has a radiological environmental monitoring program that measures  
7 radiation and radioactive materials in the environment from V.C. Summer, its ISFSI, and all  
8 other sources. The NRC staff reviewed the radiological effluent and environmental monitoring  
9 reports for the 5-year period from 2019 through 2023 as part of this cumulative impacts  
10 assessment (Dominion 2020-TN10411, Dominion 2021-TN10412, Dominion 2022-TN10413,  
11 Dominion 2023-TN10414, Dominion 2024-TN10415, Dominion 2020-TN10416, Dominion 2021-  
12 TN10417, Dominion 2022-TN10418, Dominion 2023-TN10419, and Dominion 2024-TN10420).  
13 The NRC staff's review of Dominion's data showed no indication of an adverse trend in  
14 radioactivity levels in the environment from either V.C. Summer or the ISFSI. The data showed  
15 that there was no measurable impact on the environment from operations at V.C. Summer.

16 Based on this information, the NRC staff concludes that there would be no significant  
17 cumulative radiological effect on human health resulting from the proposed action (SLR), in  
18 combination with the cumulative effects from other sources. This conclusion is based on the  
19 NRC staff's review of radiological environmental monitoring program data, radioactive effluent  
20 release data, and worker dose data; the expectation that V.C. Summer would continue to  
21 comply with Federal radiation protection standards during the period of extended operation;  
22 continued NRC oversight of plant emissions and activities, and the continued regulation of any  
23 future development or actions in the vicinity of V.C. Summer by the State of South Carolina.

### 24 **3.16.5 Environmental Justice**

25 This cumulative effects analysis evaluates the potential for disproportionately high and adverse  
26 human health and environmental effects on minority and low-income populations that could  
27 result from past, present, and reasonably foreseeable future actions, including the continued  
28 operational effects of the V.C. Summer during the SLR term. Everyone living near  
29 V.C. Summer, including minority and low-income populations, currently experience its  
30 operational effects. The NRC addresses environmental justice by identifying the location of  
31 minority and low-income populations, determining whether there would be any potential human  
32 health or environmental effects, and whether any of the effects may be disproportionately high  
33 and adverse to these populations.

34 Adverse health effects are measured in terms of the risk and rate of fatal or nonfatal adverse  
35 impacts on human health. Disproportionately high and adverse human health effects occur  
36 when the risk or rate of exposure to an environmental hazard for a minority or low-income  
37 population exceeds the risk or exposure rate for the general population or for another  
38 appropriate comparison group. Disproportionately high and adverse environmental effects refer  
39 to impacts or risks of impacts in the natural or physical environment in a minority or low-income  
40 community that appreciably exceed the environmental impact on the larger community. Such  
41 effects may include biological, cultural, economic, or social impacts. Some of these potential  
42 effects have been identified in resource areas presented in preceding sections of this chapter.  
43 As previously discussed in this chapter, the SLR impacts for all resource areas (e.g., land, air,  
44 water, and human health) would be SMALL.

1 As discussed in Section 3.12.1 of this SEIS, minority and low-income populations would not  
2 likely experience disproportionately high and adverse human health and environmental effects  
3 from the proposed action of V.C. Summer SLR. Because Dominion has no plans to hire  
4 additional workers during the SLR term, employment levels at V.C. Summer would remain  
5 unchanged, and there would be no additional demand for housing or increase in traffic. Based  
6 on this information and the analysis of human health and environmental effects, it is not likely  
7 that there would be any disproportionately high and adverse contributory effects on minority and  
8 low-income populations from the continued operation of V.C. Summer during the SLR term  
9 beyond what is already being experienced. Therefore, the only contributory effects would come  
10 from reasonably foreseeable future planned activities at V.C. Summer, and other reasonably  
11 foreseeable future offsite activities, unrelated to the proposed action.

12 When combined with past, present, and reasonably foreseeable future activities, the proposed  
13 SLR action would not likely cause disproportionately high and adverse human health and  
14 environmental effects on minority and low-income populations near V.C. Summer.

### 15 **3.16.6 Waste Management and Pollution Prevention**

16 This section of the SEIS considers the incremental waste management impacts of the SLR term  
17 when added to the contributory effects of other past, present, and reasonably foreseeable future  
18 actions. In Section 3.13.3 of this SEIS, "Proposed Action," the potential waste management  
19 impacts from continued operations at V.C. Summer during the SLR term would be SMALL.

20 As discussed in Sections 3.13.1 and 3.13.2 of this SEIS, Dominion maintains waste  
21 management programs for radioactive and nonradioactive waste generated at V.C. Summer  
22 and is required to comply with Federal and State permits and other regulatory waste  
23 management requirements. All industrial facilities, including nuclear power plants and other  
24 facilities within a 50 mi (80 km) radius of V.C. Summer, are also required to comply with  
25 appropriate NRC, EPA, and State requirements for the management of radioactive and  
26 nonradioactive waste. Current waste management activities at V.C. Summer would likely remain  
27 unchanged during the SLR term. Furthermore, the NRC staff expects that V.C. Summer will  
28 continue to comply with Federal and State requirements for radioactive and nonradioactive  
29 waste.

30 Therefore, the proposed action, including continued radioactive and nonradioactive waste  
31 generation during the SLR term, would have no cumulative effect beyond what is already being  
32 experienced. This is based on V.C. Summer's expected continued compliance with Federal and  
33 State of South Carolina requirements for radioactive and nonradioactive waste management  
34 and the expected regulatory compliance of other waste producers in the area.

### 35 **3.17 Resource Commitments Associated with the Proposed Action**

36 This section of the SEIS describes the NRC's consideration of potentially unavoidable adverse  
37 environmental impacts that could result from implementation of the proposed action and  
38 alternatives, the relationship between short-term uses of the environment and the maintenance  
39 and enhancement of long-term productivity, and the irreversible and irretrievable commitment of  
40 resources.

1 **3.17.1 Unavoidable Adverse Environmental Impacts**

2 Unavoidable adverse environmental impacts are impacts that would occur after implementation  
3 of all workable mitigation measures. Carrying out any of the replacement power alternatives  
4 considered in this SEIS, including the proposed action, would result in some unavoidable  
5 adverse environmental impacts.

6 Minor unavoidable adverse impacts on air quality would occur due to emission and release of  
7 various chemical and radiological constituents from power plant operations. Nonradiological  
8 emissions resulting from power plant operations are expected to comply with Federal EPA and  
9 State emissions standards. Chemical and radiological emissions would not exceed the national  
10 emission standards for hazardous air pollutants.

11 During nuclear power plant operations, workers and members of the public would face  
12 unavoidable exposure to low levels of radiation as well as hazardous and toxic chemicals.  
13 Workers would be exposed to radiation and chemicals associated with routine plant operations  
14 and the handling of nuclear fuel and waste material. Workers would have higher levels of  
15 exposure than members of the public, but doses would be administratively controlled and are  
16 not expected to exceed regulatory standards or administrative control limits. In comparison, the  
17 alternatives involving the construction and operation of a non-nuclear power generating facility  
18 would also result in unavoidable exposure to hazardous and toxic chemicals for workers and the  
19 public.

20 The generation of spent fuel and waste material, including low-level radioactive waste,  
21 hazardous waste, and nonhazardous waste, would be unavoidable. Hazardous and  
22 nonhazardous wastes would be generated at some non-nuclear power generating facilities.  
23 Wastes generated during plant operations would be collected, stored, and shipped for suitable  
24 treatment, recycling, or disposal in accordance with applicable Federal and State regulations.  
25 Due to the costs of handling these materials, the NRC staff expects that power plant operators  
26 would optimize all waste management activities and operations in a way that generates the  
27 smallest possible amount of waste.

28 **3.17.2 Relationship between Short-Term Use of the Environment and Long-Term**  
29 **Productivity**

30 The operation of power-generating facilities would result in short-term uses of the environment,  
31 as described in Sections 3.2 through 3.13 of this SEIS (see sections titled, "Proposed Action,"  
32 "No Action," and "Replacement Power Alternatives: Common Impacts"). Short-term is the period  
33 of time that continued power-generating activities take place.

34 Power plant operations require short-term use of the environment and commitment of resources  
35 (e.g., land and energy), indefinitely or permanently. Certain short-term resource commitments  
36 are substantially greater under most energy alternatives, including SLR, than under the  
37 no-action alternative because of the continued generation of electrical power and the continued  
38 use of generating sites and associated infrastructure. During operations, all energy alternatives  
39 entail similar relationships between local short-term uses of the environment and the  
40 maintenance and enhancement of long-term productivity.

41 Air emissions from nuclear power plant operations introduce small amounts of radiological and  
42 nonradiological emissions to the region around the plant site. Over time, these emissions would  
43 result in increased concentrations and exposure, but the NRC staff does not expect that these

1 emissions would affect air quality or radiation exposure to the extent that they would impair  
2 public health and long-term productivity of the environment.

3 Continued employment, expenditures, and tax revenues generated during power plant  
4 operations directly benefit local, regional, and State economies over the short term. Local  
5 governments investing project-generated tax revenues into infrastructure and other required  
6 services could enhance economic productivity over the long term.

7 The management and disposal of spent nuclear fuel, low-level radioactive waste, hazardous  
8 waste, and nonhazardous waste require an increase in energy and consume space at  
9 treatment, storage, or disposal facilities. Regardless of the location, the use of land to meet  
10 waste disposal needs would reduce the long-term productivity of the land.

11 Power plant facilities are committed to electricity production over the short term. After  
12 decommissioning these facilities and restoring the area, the land could be available for other  
13 future productive uses.

### 14 **3.17.3 Irreversible and Irretrievable Commitment of Resources**

15 Resource commitments are irreversible when primary or secondary impacts limit the future  
16 options for use of a resource. For example, the consumption or loss of nonrenewable resources  
17 is irreversible. An irretrievable commitment refers to the use or consumption of resources for a  
18 period of time (e.g., for the duration of the action under consideration) that are neither  
19 renewable nor recoverable for future use. Irreversible and irretrievable commitments of  
20 resources for electrical power generation include the commitment of land, water, energy, raw  
21 materials, and other natural and human-made resources required for power plant operations. In  
22 general, the commitments of capital, energy, labor, and material resources are also irreversible.

23 The implementation of any of the replacement power alternatives considered in this SEIS would  
24 entail the irreversible and irretrievable commitments of energy, water, chemicals, and—in some  
25 cases—fossil fuels. These resources would be committed during the SLR term and over the  
26 entire life cycle of the power plant, and they would be unrecoverable.

27 Energy expended would be in the form of fuel for equipment, vehicles, and power plant  
28 operations, and electricity for equipment and facility operations. Electricity and fuel would be  
29 purchased from off-site commercial sources. Water would be obtained from existing water  
30 supply systems or withdrawn from surface water or groundwater. These resources are readily  
31 available, and the NRC staff does not expect that the amounts required would deplete available  
32 supplies or exceed available system capacities.

33 NEPA Section 102(2)(C)(v), as amended by the Fiscal Responsibility Act of 2023, requires  
34 Federal agencies to describe any irreversible and irretrievable commitment of Federal resources  
35 which would be involved in the proposed agency action. The CEQ has stated that “federal  
36 resources” mean resources owned by the Federal Government or held in trust for Tribal Nations  
37 (89 FR 35442-TN10163).

38 This section discusses the irreversible and irretrievable commitment of resources such as land,  
39 water, raw materials, and other natural resources. However, this section also notes the use of  
40 resources such as the commitment of capital, energy, labor, and material resources, which are  
41 also irreversible. As some of these types of resources are expended by the NRC during its

1 review of the V.C. Summer SLR application, the NRC staff considers that these could be  
2 considered Federal resources under the Fiscal Responsibility Act of 2023.

3 It is important to note that the NRC staff and applicant have no way at this time of identifying the  
4 specific origins of all future resources that might be consumed. Some of the committed  
5 resources may ultimately be derived from Federally controlled lands, waters, funds, or other  
6 origins and some from non-Federal origins. By addressing the entirety of the resources in this  
7 SEIS, the staff has ensured consideration of any possible Federal subcomponent.

## 4 CONCLUSION

### 4.1 Environmental Impacts of License Renewal

This SEIS contains the environmental review of the application for a subsequent renewed operating license for V.C. Summer. After reviewing the plant-specific (Category 2) environmental issues in this SEIS, the NRC staff concluded that issuing a renewed license for V.C. Summer would have SMALL impacts for the Category 2 issues identified. The NRC staff considered mitigation measures for each Category 2 issue, as applicable. The NRC staff concluded that no additional mitigation measures are warranted.

### 4.2 Comparison of Alternatives

In Chapter 3 of this SEIS, the NRC staff considered the following alternatives to issuing a subsequent renewed operating license for V.C. Summer:

- the no-action alternative
- natural gas
- new nuclear (small modular reactor)
- natural gas and solar combination
- new nuclear and solar combination

Based on the review presented in this draft SEIS, the NRC staff concludes that the environmentally preferred alternative is the proposed action. The NRC staff recommends that a subsequent renewed V.C. Summer operating license be issued. As shown in Table 2-1 of this SEIS, all other power-generation alternatives would have impacts in more than one resource area that are greater than the proposed action (i.e., SLR), largely due to the environmental impacts inherent to new construction projects. To make up for the lost power generation if the NRC does not issue a subsequent renewed license for V.C. Summer (i.e., the no-action alternative), energy decision-makers may implement one of the replacement power alternatives discussed in Chapter 3 or a comparable alternative capable of replacing the power generated by V.C. Summer.

### 4.3 Recommendation

The NRC staff's preliminary recommendation is that the adverse environmental impacts of SLR for V.C. Summer are not so great that preserving the option of SLR for energy-planning decision-makers would be unreasonable. This preliminary recommendation is based on the following:

- the analysis and findings in the LR GEIS
- the ER submitted by the applicant
- the NRC staff's consultation with Federal, State, Tribal, and local agencies
- the NRC staff's independent environmental review
- the NRC staff's consideration of public comments received during the scoping process





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## 6 LIST OF PREPARERS

2 Members of the U.S. Nuclear Regulatory Commission (NRC) Office of Nuclear Material Safety  
 3 and Safeguards prepared this draft supplemental environmental impact statement (SEIS) with  
 4 assistance from other NRC organizations and Pacific Northwest National Laboratory (PNNL).  
 5 Table 6-1 identifies each preparer’s name, education and experience, and function or expertise.

6

**Table 6-1 List of Preparers**

<b>Name</b>	<b>Education and Experience</b>	<b>Function or Expertise</b>
Beth Alferink, NRC	MS Environmental Engineering MS Nuclear Engineering BS Nuclear Engineering 25+ years of national laboratory, industry, and government experience including radiation detection and measurements, nuclear power plant emergency response, operations, health physics, decommissioning, shielding and criticality	Human Health, Termination of Operations and Decommissioning, Radiological and Nonradiological Waste Management, Uranium Fuel Cycle, Spent Fuel
Briana Arlene, NRC	Master’s Certification, National Environmental Policy Act BS Conservation Biology 18 years of experience in ecological impact analysis, Endangered Species Act – Section 7 consultations, Essential Fish Habitat, and National Marine Sanctuaries Act consultations	Aquatic Resources, Special Status Species and Habitats, Endangered Species Act Section 7 Consultation, Essential Fish Habitat Consultation, National Marine Sanctuaries Act Consultation
Kim Conway, NRC	BS Mechanical Engineering 18 years of experience in NRC project management including decommissioning, licensing, and environmental reviews	Environmental Project Manager
Lloyd Desotell, NRC	MS Civil Engineering MS Water Resources Management BA Environmental Studies Over 20 years of experience conducting surface and subsurface hydrologic analyses	Surface Water Resources
Elijah Dickson, NRC	PhD Health Physics MS Health Physics BS Health Physics 18 years of conducting radiation protection, probabilistic risk assessment, and radiological consequence analyses	Severe Accident Mitigation Alternatives, Postulated Accidents
Jerry Dozier, NRC	MS Reliability Engineering MBA Business Administration BS Mechanical Engineering 31 years of experience including operations, reliability engineering, technical reviews, and NRC branch management	Severe Accident Mitigation Alternatives, Postulated Accidents

**Table 6-1 List of Preparers (Continued)**

<b>Name</b>	<b>Education and Experience</b>	<b>Function or Expertise</b>
Caroline Hsu, NRC	BS Molecular Biology BA English Literature 13 years of government experience	Land Use and Visual Resources, Terrestrial Resources, Socioeconomics
Karen Loomis, NRC	MS Environmental Science and Technology BS Environmental Resource Management BS Agriculture and Extension Education 14 years of government experience in environmental compliance, program management, and project management	Environmental Project Manager
Sarah Lopas, NRC	MPA Environmental Policy BA Molecular Biology and Environmental Science 22 years of combined industry and government experience in environmental reviews and licensing and rulemaking project management	Historic and Cultural Resources
Nancy Martinez, NRC	BS Earth and Environmental Science AM Earth and Planetary Science 13 years of experience in environmental impact analysis	Historic and Cultural Resources, Meteorology, Air Quality, Noise, Greenhouse Gas Emissions and Climate Change
Leah Parks, NRC	PhD Environmental Management MS Environmental Engineering BS Systems and Information Engineering 17 years of academic and government experience including nuclear power plant operations, health physics, decommissioning, waste management, environmental impact analysis, and performance assessment	Radiological and Nonradiological Waste Management, Spent Nuclear Fuel
Jeffrey Rikhoff, NRC	MRP Regional Environmental Planning MS Development Economics BA English 44 years of combined industry and government experience in National Environmental Policy Act (NEPA) compliance for DOE Defense Programs/ National Nuclear Security Administration (NNSA) and Nuclear Energy, DoD, and DOI; project management; socioeconomics and environmental justice impact analysis, historic and cultural resource impact assessments, consultation with American Indian Tribes, and comprehensive land use and development planning studies	Land Use, Visual Resources, Alternatives, Environmental Justice, Cumulative Impacts
Gerry Stirewalt, NRC	PhD Structural Geology with two Post-Doctoral Appointments BA Geology/Mathematics Registered PG and CEG 50+ years relevant experience in Environmental and Engineering Geology, including 3-D geospatial modeling of subsurface stratigraphy, tectonic faults, and groundwater contaminant plumes	Geologic Environment; Groundwater Resources

**Table 6-1 List of Preparers (Continued)**

<b>Name</b>	<b>Education and Experience</b>	<b>Function or Expertise</b>
David Anderson, PNNL	MS Forest Economics BS Forest Resources 33 years of experiences in NEPA planning, national and regional economic impact modeling, socioeconomics, and environmental justice impact analysis	Socioeconomics, Environmental Justice
Caitlin Condon, PNNL	PhD Radiation Health Physics BS Environmental Health 6 years of experience in health physics, NEPA environmental impact assessments, waste management, radionuclide dispersion and dosimetry modeling	Project Management
Stephen Ferencz, PNNL	PhD Geosciences (Hydrogeology/Hydrology) MA Earth Sciences BA Geology 7 years of experience in hydrologic, groundwater, and water systems modeling; 3 years of experience in environmental remediation and site characterization	Surface Water Resources, Climate Change
Tracy Fuentes, PNNL	PhD Urban Design and Planning MS Plant Biology BS Botany Over 15 years of experience, including NEPA planning; environmental impact analysis, environmental resource monitoring, data analysis, and research	Terrestrial Resources
Dave Goodman, PNNL	JD Law BS Economics 12 years of experience including NEPA environmental impact assessments, ecological restoration, Endangered Species Act, land use and visual resources, and environmental law and policy	Land Use, Visual Resources, Cumulative Impacts, NEPA Regulatory Analyst
William Ivans, PNNL	PhD Fire Protection Engineering MS Fire Protection Engineering MS Nuclear Engineering BS Nuclear Engineering 18 years of experience in probabilistic risk assessment, nuclear safety analysis, and technical reviews of risk-informed license amendment requests and severe accident mitigation alternatives	Postulated Accidents, Severe Accident Mitigation Alternatives
Rebecka Iveson, PNNL	MS Hydrogeology and Water Resource Management BS Earth and Environmental Science 5+ years in groundwater resource assessment and environmental impact evaluation, contaminated land risk assessment and remediation, and natural resource management and monitoring	Groundwater Resources, Geologic Environment

**Table 6-1 List of Preparers (Continued)**

<b>Name</b>	<b>Education and Experience</b>	<b>Function or Expertise</b>
James Jackson, PNNL	MS Environmental and Resource Management BS Ecology and Evolutionary Biology 18 years of experience including NEPA, environmental impact analysis, construction management, site characterization and remediation, and waste management	Project Management
Hayley McClendon, PNNL	BS Environmental Science 8 years of experience in environmental compliance and technical document preparation and review.	Reference Coordinator
Philip Meyer, PNNL	PhD Civil Engineering MS Civil Engineering BA Physics 30 years relevant experience in subsurface hydrology and contaminant transport, including 15 years of experience in groundwater resource assessment and environmental impacts analysis	Groundwater Resources, Geologic Environment
Dan Nally, PNNL	MA Urban and Environmental Policy and Planning BS Biology 11 years of experience in preparation and review of NEPA documents, related regulatory compliance, and conducting public outreach and engagement	Project Management
Mike Parker, PNNL	BA English Literature 25 years of experience copyediting, document design, and formatting and 20years of experience in technical editing	Production
Rajiv Prasad, PNNL	PhD Civil and Environmental Engineering MTech Civil Engineering BE Civil Engineering 25 years of experience in applying hydrologic principles to water resources engineering, hydrologic design, flooding assessments, environmental engineering, and impacts assessment including 15 years of experience in NEPA environmental assessments of surface water resources	Surface Water Resources, Climate Change
Lindsey Renaud, PNNL	MA Anthropology BA Anthropology 12 years in cultural resource management, Section 106 and 110 compliance, and NEPA environmental impact assessments. Secretary of the Interior-qualified Registered Professional Archaeologist. Experience in Tribal engagement and Native American Graves Protection and Repatriation Act compliance	Historic and Cultural Resources

**Table 6-1 List of Preparers (Continued)**

<b>Name</b>	<b>Education and Experience</b>	<b>Function or Expertise</b>
Kacoli Sen, PNNL	PhD Cancer Biology MS Zoology (Specialization Ecology) BS Zoology Diploma in Environmental Law Over 6 years of document editing and production experience	Production Editor
Steven Short, PNNL	MS Nuclear Engineering MBA Business Administration BS Nuclear Engineering 40 years of experience including nuclear safety analysis, probabilistic risk assessment, technical reviews of risk-informed license amendment requests and severe accident mitigation alternatives	Postulated Accidents, Severe Accident Mitigation Alternatives
Kazi Tamaddun, PNNL	PhD Civil and Environmental Engineering MS Civil Engineering 8 years of experience in hydrologic, hydraulic, ecosystem, and water systems modeling; hydro-climatology; climate change modeling and analysis	Surface Water
Caitlin Wessel, PNNL	PhD Marine Science MS Coastal, Marine, and Wetland Science BS Biology 11 years of relevant experience in environmental impact assessment and aquatic ecology	Aquatic Resources
Dana Vesty, PNNL	BS Environmental Science PWS (Professional Wetland Scientist) 8 years of experience in environmental assessments, permitting, environmental resource monitoring, and data analysis	Terrestrial Resources
Lin Zeng, PNNL	PhD Environmental Science and Engineering BE Civil Engineering 10 years of experience on socioeconomic analysis and environmental impact assessment	Socioeconomics, Environmental Justice

AA = associate degree; AM = Master of Arts; BA = Bachelor of Arts; BE = Bachelor of Engineering; BS = Bachelor of Science; DoD = U.S. Department of Defense; DOE = Department of Energy; DOI = U.S. Department of Interior; EFH = essential fish habitat; MBA Master of Business Administration; MHP = Master of Public Health; MPM = Master of Project Management; MRP = Master of Regional Planning; MS = Master of Science; MTech = Masters of Technology; NEPA = National Environmental Policy Act of 1969; NNSA = National Nuclear Security Administration; NRC = U.S. Nuclear Regulatory Commission; PhD = Doctor of Philosophy; PMP = Project Management Professional; PNNL = Pacific Northwest National Laboratory.





1 **7 LIST OF AGENCIES, ORGANIZATIONS, AND PERSONS TO WHOM**  
2 **THE NRC SENDS COPIES OF THIS SEIS**

3 **Table 7-1 List of Agencies, Organizations, and Persons to Whom Copies of this**  
4 **Supplemental Environmental Impact Statement Are Sent**

<b>Name</b>	<b>Affiliation</b>
W. Eric Emerson	South Carolina Office of Historic Preservation
Hon. Brian Harris	Catawba Indian Nation
Hon. David Hill	The Muscogee (Creek) Nation
Hon. Chuck Hoskin	Cherokee Nation
Ntale Kajumba	U.S. Environmental Protection Agency
Jamie Loichinger	Advisory Council on Historic Preservation
Hon. Richard Sneed	Eastern Band of Cherokee Indians
Tracy Watson	U.S. Environmental Protection Agency

This supplemental environmental impact statement will also be provided to commenters who provided their contact information during the scoping period. The NRC staff has listed the names of all commenters in the scoping summary report (Agencywide Documents Access and Management System [ADAMS] Accession No. ML24278A042).



## APPENDIX A

### COMMENTS RECEIVED ON THE VIRGIL C. SUMMER NUCLEAR STATION, UNIT 1, ENVIRONMENTAL REVIEW

#### A.1 Comments Received During the Scoping Period

The U.S. Nuclear Regulatory Commission (NRC) staff began the scoping process for the environmental review of the Virgil C. Summer Nuclear Station, Unit 1, (V.C. Summer) subsequent license renewal application on November 2023, in accordance with the National Environmental Policy Act of 1969 (42 *United States Code* [U.S.C.] 4321 et seq.-TN661) (NEPA). On November 3, 2023, the NRC issued a notice of intent to conduct an environmental scoping process for subsequent license renewal of V.C. Summer that was published in the *Federal Register* (88 FR 75627-TN10388). In its notice of intent, the NRC requested that members of the public and stakeholders submit comments on the scope of the environmental review for the proposed V.C. Summer SLR.

The scoping process included two public meetings: a virtual meeting on November 9, 2023, and an in-person meeting in Blair, South Carolina, on November 14, 2023. Attendees made oral statements that were recorded and transcribed by a certified court reporter. A summary and a transcript of the public scoping meetings are available in the NRC's Agencywide Documents Access and Management System (ADAMS) under ADAMS Accession No. ML23331A789 (NRC 2023-TN10830). The ADAMS Public Electronic Reading Room is accessible at <http://www.nrc.gov/reading-rm/adams.html>. In addition to the comments received during the public meetings, comments were also received electronically via [Regulations.gov](https://www.regulations.gov) and email.

At the conclusion of the scoping process, the NRC staff issued a scoping summary report (NRC 2024-TN10831). The report: (1) contains comments received during the scoping period" instead of confining to only public meetings and [Regulations.gov](https://www.regulations.gov), (2) groups these comments by subject area, and (3) contains NRC staff responses to these comments.

#### A.2 References

88 FR 75627. November 3, 2023. "Notice of Intent to Conduct Scoping Process and Prepare Environmental Impact Statement; Dominion Energy South Carolina, Inc.; Virgil C. Summer Nuclear Station, Unit 1." *Federal Register*, Nuclear Regulatory Commission. TN10388.

National Environmental Policy Act of 1969 (NEPA), as amended. 42 U.S.C. § 4321 et seq. TN661.

NRC (U.S. Nuclear Regulatory Commission). 2023. *U.S. Nuclear Regulatory Commission Summary of Public Meetings, Environmental Scoping Meetings Related to the Virgil C. Summer Nuclear Station Subsequent License Renewal Application*. Washington, D.C. ADAMS Accession No. ML23331A789. TN10830.

NRC (U.S. Nuclear Regulatory Commission). 2024. Letter from S.S. Koenick, Chief, Environmental Project Management Branch 1, Division of Rulemaking, Environment, and Financial Support, Office of Nuclear Material Safety and Safeguards, to E.S. Carr, President, Nuclear Operations and Chief Nuclear Officer, Innsbrook Technical Center, dated November 7, 2024, regarding "Issuance of Environmental Scoping Summary Report Associated with the U.S.

- 1 Nuclear Regulatory Commission Staff's Review of the Subsequent License Renewal Application
- 2 for Virgil C. Summer Nuclear Station, Unit 1 (EPID Number: L-2023-0003) (Docket Number: 50-
- 3 395)." Washington, D.C. ADAMS Accession Package No. ML24278A033. TN10831.

## APPENDIX B

### APPLICABLE LAWS, REGULATIONS, AND OTHER REQUIREMENTS

Several Federal laws and regulations affect environmental protection, health, safety, compliance, and consultation at every U.S. Nuclear Regulatory Commission (NRC) licensed nuclear power plant. Some of them require permits by or consultation with other Federal agencies or State, Tribal, or local governments. Certain Federal environmental requirements have been delegated to State authorities for enforcement and implementation. Furthermore, States have also enacted laws to protect public health and safety and the environment. It is the NRC's policy to make sure that nuclear power plants are operated in a manner that provides adequate protection of public health and safety and protection of the environment through compliance with applicable Federal and State laws, regulations, and other requirements, as appropriate.

The Atomic Energy Act of 1954, as amended (AEA) (42 *United States Code* [U.S.C.] 2011 et seq.; TN663), and the Energy Reorganization Act of 1974, as amended (42 U.S.C. 5801 et seq.; TN4466) give the NRC the licensing and regulatory authority for commercial nuclear energy use. They allow the NRC to establish dose and concentration limits for protection of workers and the public for activities under NRC jurisdiction. The NRC implements its responsibilities under the AEA through regulations set forth in Title 10, "Energy," of the *Code of Federal Regulations* (CFR). The AEA also authorizes the NRC to enter into an agreement with any State that allows the State to assume regulatory authority for certain activities (see 42 U.S.C. 2021; TN10029). South Carolina entered into an agreement with the NRC in September 1969 to assume regulatory responsibility over certain byproducts, sources, and quantities of special nuclear materials not sufficient to form a critical mass. The South Carolina Department of Health and Environmental Control administers the South Carolina Agreement State Program.

In addition to carrying out some Federal programs, State legislatures develop their own laws. State statutes can supplement, as well as implement, Federal laws for the protection of air, surface water, and groundwater. State legislation may address solid waste management programs, locally rare or endangered species, and historic and cultural resources.

The U.S. Environmental Protection Agency (EPA) has the primary responsibility to administer the Federal Water Pollution Control Act of 1972 (33 U.S.C. 1251 et seq., herein referred to as the Clean Water Act [CWA]-TN662). The National Pollutant Discharge Elimination System (NPDES) program addresses water pollution by regulating the discharge of potential pollutants to waters of the United States. The EPA allows for primary enforcement and administration through State agencies if the State program is at least as stringent as the Federal program.

#### **B.1 Federal and State Requirements**

Virgil C. Summer Nuclear Station, Unit 1 (V.C. Summer) is subject to various Federal and State requirements. Table B-1 lists the principal Federal, State, and local laws that are used or mentioned in this supplemental environmental impact statement.

**Table B-1 Federal and State Requirements for Virgil C. Summer Nuclear Station**

Activity	Law/Regulation	Requirements
Current operating license and license renewal	Atomic Energy Act of 1954, 42 U.S.C. 2011 et seq. Energy Reorganization Act of 1974, 42 U.S.C. 5801 et seq.	The Atomic Energy Act of 1954, as amended (AEA), and the Energy Reorganization Act of 1974, as amended (42 U.S.C. 5801 et seq.) give the U.S. Nuclear Regulatory Commission (NRC) the licensing and regulatory authority for commercial nuclear energy use. They allow the NRC to establish dose and concentration limits for protection of workers and the public for activities under NRC jurisdiction. The NRC implements its responsibilities under the AEA through regulations set forth in Title 10, "Energy," of the <i>Code of Federal Regulations</i> (CFR).
Current operating license and license renewal	National Environmental Policy Act of 1969, 42 U.S.C. 4321 et seq.	The NEPA, requires Federal agencies to integrate environmental values into their decision-making process by considering the environmental impacts of proposed Federal actions and reasonable alternatives to those actions. NEPA establishes policy, sets goals (in Section 101), and provides means (in Section 102) for carrying out the policy. NEPA Section 102(2) contains action-forcing provisions to ensure that Federal agencies follow the letter and spirit of the Act. For major Federal actions significantly affecting the quality of the human environment, Section 102(2)(C) of NEPA requires Federal agencies to prepare a detailed statement that includes the environmental impacts of the proposed action and other specified information. This environmental impact statement has been prepared in accordance with NEPA requirements and NRC regulations (10 CFR Part 51) for implementing NEPA to assure compliance with NEPA Section 102(2).
Current operating license and license renewal	10 CFR Part 20	Regulations in 10 CFR Part 20, "Standards for Protection Against Radiation," establish standards for protection against ionizing radiation resulting from activities conducted under licenses issued by the NRC. These regulations are issued under the AEA, and the Energy Reorganization Act of 1974, as amended. The purpose of these regulations is to control the receipt, possession, use, transfer, and disposal of licensed material by any licensee in such a manner that the total dose to an individual (including doses resulting from licensed and unlicensed radioactive material and from radiation sources other than background radiation) does not exceed the standards for protection against radiation prescribed in the regulations in this Part.

**Table B-1 Federal and State Requirements for Virgil C. Summer Nuclear Station (Continued)**

Activity	Law/Regulation	Requirements
Current operating license and license renewal	10 CFR Part 50	Regulations in 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities," are NRC regulations issued under the AEA, and Title II of the Energy Reorganization Act of 1974, as amended, to provide for the licensing of production and utilization facilities, including nuclear power reactors.
Current operating license and license renewal	10 CFR Part 51	Regulations in 10 CFR Part 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions," contain the NRC's regulations that implement NEPA.
Current operating license and license renewal	10 CFR Part 54	NRC regulations in 10 CFR Part 54, "Requirements for Renewal of Operating Licenses for Nuclear Power Plants," govern the issuance of renewed operating licenses and renewed combined licenses for nuclear power plants licensed under Sections 103 or 104b of the AEA, as amended, and Title II of the Energy Reorganization Act of 1974, as amended (88 Stat. 1242). The regulations focus on managing the adverse effects of aging nuclear plants. The rule is intended to ensure that important systems, structures, and components will continue to perform their intended functions during the period of extended operation.
Air quality protection	Clean Air Act, 42 U.S.C. 7401 et seq.	<p>The Clean Air Act (CAA) is intended to "protect and enhance the quality of the nation's air resources so as to promote the public health and welfare and the productive capacity of its population." The CAA establishes regulations to ensure maintenance of air quality standards and authorizes individual States to manage permits. Section 118 of the CAA requires each Federal agency with jurisdiction over properties or facilities engaged in any activity that might result in the discharge of air pollutants to comply with all Federal, State, inter-State, and local requirements with regard to the control and abatement of air pollution. Section 109 of the CAA directs the EPA to set National Ambient Air Quality Standards for criteria pollutants. The EPA has identified and set National Ambient Air Quality Standards for the following criteria pollutants: particulate matter, sulfur dioxide, carbon monoxide, ozone, nitrogen dioxide, and lead. Section 111 of the CAA requires the establishment of national performance standards for new or modified stationary sources of atmospheric pollutants. Section 160 of the CAA requires that specific emission increases must be evaluated before permit approval to prevent significant deterioration of air quality.</p> <p>Section 112 requires specific standards for release of hazardous air pollutants (including radionuclides). These standards are implemented through plans developed by each State and approved by the EPA. The CAA requires</p>

**Table B-1 Federal and State Requirements for Virgil C. Summer Nuclear Station (Continued)**

Activity	Law/Regulation	Requirements
		<p>sources to meet standards and obtain permits to satisfy those standards. Nuclear power plants may be required to comply with the CAA Title V, Sections 501–507, for sources subject to New Source Performance Standards or sources subject to National Emission Standards for Hazardous Air Pollutants.</p> <p>The EPA regulates the emissions of air pollutants using 40 CFR Parts 50 to 99.</p>
Water resources protection	Clean Water Act, 33 U.S.C. 1251 et seq., and the NPDES (40 CFR Part 122)	<p>The Clean Water Act (CWA) was enacted to “restore and maintain the chemical, physical, and biological integrity of the Nation’s water.” The CWA requires all branches of the Federal government with jurisdiction over properties or facilities engaged in any activity that might result in a discharge or runoff of pollutants to surface waters to comply with Federal, State, inter-State, and local requirements. As authorized by the CWA, the NPDES permit program controls water pollution by regulating point sources that discharge pollutants into waters of the United States. The NPDES program requires all facilities that discharge pollutants from any point source into waters of the United States to obtain an NPDES permit. A NPDES permit is developed with two levels of controls: (1) technology-based limits and (2) water quality-based limits. NPDES permit terms may not exceed 5 years, and the applicant must reapply at least 180 days prior to the permit expiration date. A nuclear power plant may also participate in the NPDES General Permit for Industrial Stormwater due to stormwater runoff from industrial or commercial facilities to waters of the United States. The EPA is authorized under the CWA to directly implement the NPDES program; however, the EPA has authorized many States to implement all or parts of the national program.</p> <p>Section 316(a) of the CWA addresses thermal effects and requires that facilities operate under effluent limitations that assure the protection and propagation of a balanced, indigenous population of shellfish, fish, and wildlife in and on the receiving body of water. Section 316(b) of the CWA requires that cooling-water intake structures of regulated facilities must reflect the best technology available for minimizing impingement mortality and entrainment of aquatic organisms. These sections of the CWA are implemented and enforced through the NPDES program.</p> <p>Section 401 of the CWA requires that an applicant for a Federal license or permit to conduct any activity that may result in any discharge into navigable waters must provide the Federal licensing or permitting agency with a</p>



**Table B-1 Federal and State Requirements for Virgil C. Summer Nuclear Station (Continued)**

Activity	Law/Regulation	Requirements
		<p>certification (or waiver) from the State or appropriate water pollution control agency in which the discharge originates or will originate. This water quality certification assures that discharges from the activity or project to be licensed or permitted will comply with all limitations necessary to meet established State water quality requirements (40 CFR Part 121).</p> <p>The U.S. Army Corps of Engineers is the lead agency for enforcement of CWA wetland requirements (33 CFR Part 320, "General Regulatory Policies"). Under Section 404 of the CWA, the U.S. Army Corps of Engineers or a delegated State agency or Tribe has the authority to review and approve, condition, or deny all permits or licenses that might result in a discharge of dredge or fill material to waters of the United States, including wetlands.</p>
Water resources protection	Coastal Zone Management Act of 1972, as amended (16 U.S.C. 1451 et seq.)	<p>Congress enacted the Coastal Zone Management Act (CZMA) in 1972 to address the increasing pressures of overdevelopment upon the Nation's coastal resources. The National Oceanic and Atmospheric Administration administers the CZMA. The CZMA encourages States to preserve, protect, develop, and, where possible, restore or enhance valuable natural coastal resources such as wetlands, floodplains, estuaries, beaches, dunes, barrier islands, and coral reefs, as well as the fish and wildlife using those habitats. Participation by States is voluntary. To encourage States to participate, the CZMA makes Federal financial assistance available to any coastal State or territory, including those on the Great Lakes, as long as the State or territory is willing to develop and implement a comprehensive coastal management program.</p>
Waste management and pollution prevention	Resource Conservation and Recovery Act, 42 U.S.C. 6901 et seq.	<p>The Resource Conservation and Recovery Act requires the EPA to define and identify hazardous waste; establish standards for its transportation, treatment, storage, and disposal; and require permits for persons engaged in hazardous waste activities. Section 3006, "Authorized State Hazardous Waste Programs" (42 U.S.C. 6926), allows States to establish and administer these permit programs with EPA approval. The EPA regulations implementing the Resource Conservation and Recovery Act are found in 40 CFR Parts 260 through 283. Regulations imposed on a generator or on a treatment, storage, and/or disposal facility vary according to the type and quantity of material or waste generated, treated, stored, and/or disposed. The method of treatment, storage, and/or disposal also impacts the extent and complexity of the requirements.</p>

**Table B-1 Federal and State Requirements for Virgil C. Summer Nuclear Station (Continued)**

Activity	Law/Regulation	Requirements
Waste management and pollution prevention	Pollution Prevention Act, 42 U.S.C. 13101 et seq.	The Pollution Prevention Act establishes a national policy for waste management and pollution control that focuses first on source reduction, then on environmental issues, safe recycling, treatment, and disposal.
Waste management and pollution prevention	Nuclear Waste Policy Act of 1982 (42 U.S.C. § 10101 et seq.-TN740)	The Nuclear Waste Policy Act provides for the research and development of repositories for the disposal of high-level radioactive waste, spent nuclear fuel, and low-level radioactive waste. Title I includes provisions for disposal and storage of high-level radioactive waste and spent nuclear fuel. Subtitle A of Title I delineates requirements for site characterization and construction of the repository and participation of States and other local governments in the selection process. Subtitles B, C, and D of Title I deal with specific issues for interim storage, monitored retrievable storage, and low-level radioactive waste.
Waste management and pollution prevention	Low-Level Radioactive Waste Policy Act of 1980, as amended (42 U.S.C. § 2021b et seq.-TN6606)	The Low-Level Radioactive Waste Policy Act amended the AEA to improve the procedures for implementation of compacts providing for the establishment and operation of regional low-level radioactive waste disposal facilities. It also allows Congress to grant consent for certain inter-State compacts. The amended Act sets forth the responsibilities for disposal of low-level waste by States or inter-State compacts. The Act states the amount of waste that certain low-level waste recipients can receive over a set period of time. The amount of low-level radioactive waste generated by both pressurized and boiling water reactor types is allocated over a transition period until a local waste facility becomes operational.
Waste management and pollution prevention	Hazardous Materials Transportation Act, as amended (49 U.S.C. § 5101 et seq.-TN6605)	The Hazardous Materials Transportation Act regulates the intra-State and inter-State transportation of hazardous material (including radioactive material). According to the act, States may regulate the transport of hazardous material as long as their regulation is consistent with provisions of the act or U.S. Department of Transportation regulations provided in 49 CFR Parts 171–177 (TN5466). Other regulations regarding packaging for transportation of radionuclides are contained in 49 CFR Part 173, Subpart I.
Protected species	Bald and Golden Eagle Protection Act of 1940, as amended (16 U.S.C. 668-668d)	The Bald and Golden Eagle Protection Act prohibits anyone, without a permit issued by the Secretary of the Interior, from taking bald or golden eagles, including their parts (including feathers), nests, or eggs. The Act defines “take” as pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest, or disturb. Regulations further define “disturb” as “to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle, 2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or 3) nest abandonment, by

**Table B-1 Federal and State Requirements for Virgil C. Summer Nuclear Station (Continued)**

Activity	Law/Regulation	Requirements
Protected species	Endangered Species Act, 16 U.S.C. 1531 et seq.	substantially interfering with normal breeding, feeding, or sheltering behavior.” The Endangered Species Act was enacted to prevent the further decline of endangered and threatened species and to restore those species and their critical habitats. Section 7, “Interagency Cooperation,” of the Act requires Federal agencies to consult with the U.S. Fish and Wildlife Service or the National Marine Fisheries Service (NMFS) on Federal actions that may affect listed species or designated critical habitats.
Protected species	Magnuson–Stevens Fishery Conservation and Management Act, 16 U.S.C. 1801 et seq.	The Magnuson–Stevens Fishery Conservation and Management Act, as amended, governs marine fisheries management in U.S. Federal waters. The Act created eight regional Fishery Management Councils and includes measures to rebuild overfished fisheries, protect essential fish habitat, and reduce bycatch. Under Section 305 of the Act, Federal agencies are required to consult with the NMFS for any Federal actions that may adversely affect essential fish habitat.
Protected species	Migratory Bird Treaty Act, 16 U.S.C. 703- 712 et seq.	The Migratory Bird Treaty Act (MBTA) implements four international conservation treaties that the U.S. entered with Canada (1916), Mexico (1936), Japan (1972), and Russia (1976). The MBTA has been amended with signing of each treaty, as well as when any of the treaties were subsequently amended. To ensure that populations of all protected migratory birds are sustained, the MBTA prohibits the take of protected migratory bird species without prior authorization from U.S. Fish and Wildlife Service. Under the MBTA, “take” includes killing, capturing, selling, trading, and transport of protected migratory bird species.
Historic preservation and cultural resources	National Historic Preservation Act, 54 U.S.C. 300101 et seq.	The National Historic Preservation Act was enacted to create a national historic preservation program, including the National Register of Historic Places and the Advisory Council on Historic Preservation. Section 106 of the Act requires Federal agencies to account for the effects of their undertakings on historic properties. The Advisory Council on Historic Preservation regulations implementing Section 106 of the Act are found in 36 CFR Part 800, “Protection of Historic Properties.” The regulations call for public involvement in the Section 106 consultation process, including involvement from Indian Tribes and other interested members of the public, as applicable.

AEA = Atomic Energy Act of 1954; CAA = Clean Air Act; CCR = *California Code of Regulations*; CFR = *Code of Federal Regulations*; CWA = Clean Water Act; CZMA = Coastal Zone Management Act; EPA = U.S. Environmental Protection Agency; MBTA = Migratory Bird Treaty Act; NEPA = National Environmental Policy Act; NMFS = National Marine Fisheries Service; NPDES = National Pollutant Discharge Elimination System; NRC = U.S. Nuclear Regulatory Commission; U.S.C. = U.S. Code.

1 **B.2 Operating Permits and Other Requirements**

2 Table B-2 lists the permits and licenses issued by Federal, State, and local authorities for  
 3 activities at V.C. Summer, as identified in Section E9.1 of the environmental report.

4 **Table B-2 Operating Permits and Other Requirements for Virgil C. Summer Nuclear**  
 5 **Station**

Permit	Responsible Agency	Number	Expiration Date	Authorized Activity
Operating license for Virgil C. Summer Nuclear Station, Unit 1 (V.C. Summer)	U.S. Nuclear Regulatory Commission (NRC)	NPF-12	August 6, 2042	Operation of V.C. Summer Unit 1
General license for storage of spent fuel	NRC	General permit	N/A	Storage of power reactor spent fuel and other associated radioactive materials in an independent spent fuel storage installation
Hazardous materials registration	U.S. Department of Transportation	062023550338F	June 30, 2024 (renewed annually)	Hazardous materials shipments
Hazardous waste generator registration	U.S. Environmental Protection Agency	SCD069311579	Does not expire	Generation of hazardous waste
Operation and maintenance of the Parr Hydroelectric Project	Federal Energy Regulatory Commission	1894-211	November 1, 2070	Operation and maintenance of Parr Hydroelectric Project (includes Monticello and Parr Reservoirs)
Migratory bird special utility permit	U.S. Fish and Wildlife Service	MB040209-2	March 31, 2024 Renewal submitted, administratively extended	Authorized to collect, transport, and temporarily possess carcasses and partial remains of migratory birds and emergency relocation of nests of migratory birds other than eagles or threatened and endangered species

**Table B-2 Operating Permits and Other Requirements for Virgil C. Summer Nuclear Station (Continued)**

Permit	Responsible Agency	Number	Expiration Date	Authorized Activity
Migratory bird special utility permit	South Carolina Department of Natural Resources (SCDNR)	MB-03-24	December 31, 2024	Authorized to collect, transport, and temporarily possess carcasses and partial remains of migratory birds and emergency relocation of nests of migratory birds other than eagles or threatened and endangered species
Scientific collecting permit	SCDNR	F-24-059	December 31, 2024	To conduct wildlife investigations for scientific purposes
Water treatment plant dischargers	South Carolina Department of Health and Environmental Control (SCDHEC)	SCG646000	July 31, 2027	Discharge effluent to Monticello Reservoir from offsite water treatment facility
Stormwater discharge permit	SCDHEC	General Permit No. SCR000000	June 30, 2027	Discharge stormwater to Monticello and Parr Reservoirs and Broad River (Outfalls 001, 014, 003)
Surface water withdrawal permit	SCDHEC	20PN001	March 9, 2044	Withdrawal of surface water from Monticello Reservoir
Permit to transport radioactive waste	SCDHEC	0163-39-24	December 31, 2024	Radioactive waste transportation in South Carolina
National Pollutant Discharge Elimination System (NPDES) permit	SCDHEC	SC0030856	August 31, 2027	Plant wastewater and cooling water discharges
Safe Drinking Water Act Permit	SCDHEC	203004	No expiration date	Operate public, nontransient, noncommunity water system
Registration certificate	SCDHEC	03157	July 31, 2024	Operation of underground storage tanks

**Table B-2 Operating Permits and Other Requirements for Virgil C. Summer Nuclear Station (Continued)**

Permit	Responsible Agency	Number	Expiration Date	Authorized Activity
License to ship radioactive material	Tennessee Department of Environment and Conservation	T-SC001-L24	December 31, 2024	Shipment of radioactive material to a licensed disposal/processing facility in Tennessee

ISFSI = independent spent fuel storage installation; NRC = U.S. Nuclear Regulatory Commission; SCDHEC = South Carolina Department of Health and Environmental Control; SCDNR = South Carolina Department of Natural Resources; V.C. Summer = Virgil C. Summer Nuclear Station.

1 **B.3 References**

- 2 42 U.S.C. § 2021. U.S. Code Title 42, Public Health and Welfare, Section 2021, “Cooperation  
3 with States.” TN10029.
- 4 Atomic Energy Act of 1954. 42 U.S.C. § 2011 et seq. Public Law 112-239, as amended. TN663.
- 5 Energy Reorganization Act of 1974, as amended. 42 U.S.C. § 5801 et seq. TN4466.
- 6 Federal Water Pollution Control Act of 1972 (commonly referred to as the Clean Water Act). 33  
7 U.S.C. § 1251 et seq. TN662.

1 **APPENDIX C**

2 **CONSULTATION CORRESPONDENCE**

3 **C.1 Endangered Species Act Section 7 Consultation**

4 As a Federal agency, the U.S. Nuclear Regulatory Commission (NRC) must comply with the  
5 Endangered Species Act of 1973 (ESA), as amended (16 *United States Code* [U.S.C.] 1531  
6 et seq.; TN1010), as part of any action authorized, funded, or carried out by the agency. In this  
7 case, the proposed agency action is whether to issue a subsequent renewed facility operating  
8 license for the continued operation of Virgil C. Summer Nuclear Station, Unit 1 (V.C. Summer).  
9 The proposed action would authorize Dominion Energy South Carolina, Inc. (Dominion) to  
10 operate V.C. Summer for an additional 20 years beyond the current renewed operating license  
11 term. Under Section 7 of the ESA, the NRC must consult with the U.S. Fish and Wildlife Service  
12 (FWS) and the National Marine Fisheries Service (NMFS) (“the Services” [collectively] or  
13 “Service” [individually]), as appropriate, to ensure that the proposed action is not likely to  
14 jeopardize the continued existence of any endangered or threatened species or result in the  
15 destruction or adverse modification of designated critical habitat.  
16

17 **C.1.1 Federal Agency Obligations under Section 7 of the Endangered Species Act**

18 The ESA and the regulations that implement ESA Section 7 at Title 50 of the *Code of Federal*  
19 *Regulations* (CFR) Part 402 (TN4312) describe the consultation process that Federal agencies  
20 must follow in support of agency actions. As part of this process, the Federal agency shall either  
21 request that the Services (1) provide a list of any listed or proposed species or designated or  
22 proposed critical habitats that may be present in the action area or (2) request that the Services  
23 concur with a list of species and critical habitats that the Federal agency has created  
24 (50 CFR 402.12(c)). If any such species or critical habitats may be present, the Federal agency  
25 prepares a biological assessment to evaluate the potential effects of the agency action and  
26 determine whether the species or critical habitats are likely to be adversely affected by the  
27 action (50 CFR 402.12(a); 16 U.S.C. 1536(c)-TN4459).

28 Biological assessments are required for any agency action that is a “major construction activity”  
29 (50 CFR 402.12(b)) (TN4312). A major construction activity is a construction project or other  
30 undertaking having construction-type impacts that is a major Federal action significantly  
31 affecting the quality of the human environment under the National Environmental Policy Act of  
32 1969, as amended (42 U.S.C. 4321 et seq.) (NEPA) (51 FR 19926-TN7600). Federal agencies  
33 may fulfill their obligations to consult with the Services under ESA Section 7 and to prepare a  
34 biological assessment, if required, in conjunction with the interagency cooperation procedures  
35 required by other statutes, including NEPA (50 CFR 402.06(a)) (TN4312). In such cases, the  
36 Federal agency should include the results of ESA Section 7 consultation(s) in the NEPA  
37 document (50 CFR 402.06(b)).

38 **C.1.2 Biological Evaluation**

39 The proposed action of V.C. Summer subsequent license renewal (SLR) does not require the  
40 preparation of a biological assessment because it is not a major construction activity.  
41 Nonetheless, the NRC staff must consider the impacts of this action on federally listed species  
42 and designated critical habitats. In cases where the staff finds that SLR “may affect” ESA-  
43 protected species or habitats, ESA Section 7 requires the NRC to consult with the relevant  
44 Service(s).

1 To support such consultations, the NRC staff has incorporated its analysis of the potential  
 2 impacts of the proposed SLR into Section 3.8 of this supplemental environmental impact  
 3 statement (SEIS). The NRC staff refers to its ESA analysis as a “biological evaluation.”

4 The NRC staff structured its biological evaluation in accordance with the Services’ suggested  
 5 biological assessment contents described at 50 CFR 402.12(f) (TN4312). Section 3.8.1.1 of this  
 6 SEIS describes the action area as well as the ESA-protected species and critical habitats  
 7 potentially present in the action area. Section 3.8.5.1 assesses the potential effects of the  
 8 proposed V.C. Summer SLR on the ESA-protected species and critical habitats present in the  
 9 action area and contains the NRC’s effect determination for each of those species and habitats.  
 10 Finally, Sections 3.8.6 through 3.8.11 address the potential effects of the no-action alternative  
 11 and the replacement power alternatives. The results of the NRC staff’s analysis are summarized  
 12 below in Table C-1.

13 **Table C-1 Effect Determinations for Federally Listed Species Under U.S. Fish and**  
 14 **Wildlife Service Jurisdiction for Virgil C. Summer Nuclear Station**  
 15 **Subsequent License Renewal**

Species	Federal Status <sup>(a)</sup>	Potentially Present in the Action Area?	Effect Determination <sup>(b)</sup>	FWS Concurrence Date <sup>(c)</sup>
tricolored bat	FPE	Y	NLAA	N/A
monarch butterfly	FC	Y	NLAA	N/A

N/A = not applicable.

- (a) Indicates protection status under the Endangered Species Act. FC = candidate for Federal listing and FPE = proposed for Federal listing as endangered.
- (b) The NRC staff makes its effect determinations for federally listed species in accordance with the language and definitions specified in the U.S. Fish and Wildlife Service (FWS) and National Marine Fisheries Service (NMFS) Endangered Species Consultation Handbook (FWS and NMFS 1998-TN1031). NLAA = may affect but is not likely to adversely affect.
- (c) The Endangered Species Act does not require Federal agencies to seek FWS concurrence for agency actions that are not likely to jeopardize the continued existence of any proposed species or for conclusions regarding effects on candidate species.

16 **C.1.3 Chronology of Endangered Species Act Consultation**

17 *Endangered Species Act Section 7 Consultation with the U.S. Fish and Wildlife Service*

18 ESA regulations in 50 CFR 402.10(a) require Federal agencies to confer with the Services  
 19 regarding any agency action that is likely to jeopardize the continued existence of any proposed  
 20 species or result in the destruction or adverse modification of proposed critical habitat.  
 21 Therefore, based on its “not likely to adversely affect” determination, the NRC is not required to  
 22 confer with the FWS on the tricolored bat. Because the monarch butterfly is a candidate for  
 23 Federal listing, the ESA does not require the NRC to consult with or receive concurrence from  
 24 the FWS regarding this species.

25 Table C-2 lists the correspondence between the NRC and the FWS pursuant to ESA Section 7  
 26 that has transpired to date.

27 *Endangered Species Act Section 7 Consultation with the National Marine Fisheries Service*

28 As discussed in Section 3.8.1 and 3.8.5.2 of this SEIS, no federally listed species or critical  
 29 habitats under NMFS’s jurisdiction occur within the action area. Therefore, the NRC staff did not  
 30 engage the NMFS pursuant to ESA Section 7 for the proposed V.C. Summer SLR.



1 **Table C-2 Endangered Species Act Section 7 Consultation Correspondence with the**  
 2 **U.S. Fish and Wildlife Service about Virgil C. Summer Nuclear Station**

Date	Description	ADAMS Accession No. <sup>(a)</sup>
February 20, 2024	South Carolina Ecological Services (FWS) to B. Arlene (NRC), List of threatened and endangered species for proposed Virgil C. Summer SLR	ML2405A1A011

ADAMS = Agencywide Documents Access and Management System; FWS = U.S. Fish and Wildlife Service; NRC = U.S. Nuclear Regulatory Commission; SLR = subsequent license renewal.

(a) Document in the NRC’s ADAMS can be accessed at <http://adams.nrc.gov/wba/>.

3 **C.2 Magnuson–Stevens Act Essential Fish Habitat Consultation**

4 The NRC must comply with the Magnuson–Stevens Fishery Conservation and Management Act  
 5 of 1976 (MSA), as amended (16 U.S.C. 1801 et seq.-TN9966), for any actions authorized,  
 6 funded, or undertaken, or proposed to be authorized, funded, or undertaken that may adversely  
 7 affect any essential fish habitat (EFH) identified under the MSA. In Sections 3.8.3 and 3.8.5.3 of  
 8 this SEIS, the NRC staff concludes that the NMFS has not designated any EFH under the MSA  
 9 within the affected area and that the proposed V.C. Summer SLR would have no effect on EFH.  
 10 Thus, the MSA does not require the NRC to consult with NMFS for the proposed action.

11 **C.3 National Marine Sanctuaries Act Consultation**

12 The National Marine Sanctuaries Act of 1966, as amended (16 U.S.C. § 1431 et seq.-2000-  
 13 TN7197), authorizes the Secretary of Commerce to designate and protect areas of the marine  
 14 environment with special national significance due to their conservation, recreational, ecological,  
 15 historical, scientific, cultural, archaeological, educational, or aesthetic qualities as national  
 16 marine sanctuaries. Under Section 304(d) of the act, Federal agencies must consult with the  
 17 National Oceanic and Atmospheric Administration’s Office of National Marine Sanctuaries if a  
 18 Federal action is likely to destroy, cause the loss of, or injure any sanctuary resources.

19 In Sections 3.8.3 and 3.8.5.4 of this SEIS, the NRC staff concludes that no coastal or marine  
 20 waters or Great Lakes occur near V.C. Summer and that the V.C. Summer SLR would have no  
 21 effect on sanctuary resources. Thus, the National Marine Sanctuaries Act of 1966, as amended  
 22 does not require the NRC to consult with the National Oceanic and Atmospheric Administration  
 23 for the proposed action.

24 **C.4 National Historic Preservation Act Section 106 Consultation**

25 The National Historic Preservation Act of 1966, as amended (NHPA) (54 U.S.C. 306108 et seq.;  
 26 TN4839), requires Federal agencies to consider the effects of their undertakings on historic  
 27 properties and consult with applicable State and Federal agencies, Tribal groups, individuals,  
 28 and organizations with a demonstrated interest in the undertaking before taking action. Historic  
 29 properties are defined as resources that are eligible for listing on the National Register of  
 30 Historic Places. The NHPA Section 106 review process is outlined in regulations issued by the  
 31 Advisory Council on Historic Preservation in 36 CFR Part 800, “Protection of Historic Properties”  
 32 (TN513). In accordance with 36 CFR 800.8(c), “Use of the NEPA Process for Section 106  
 33 Purposes,” the NRC has elected to use the NEPA process to comply with its obligations under  
 34 Section 106 of the NHPA.

1 Table C-3 lists the chronology of consultation and consultation documents related to the NRC's  
 2 NHPA Section 106 review of the V.C. Summer SLR.

3 **Table C-3 National Historic Preservation Act Correspondence for Virgil C. Summer**  
 4 **Nuclear Station**

<b>Date</b>	<b>Sender and Recipient</b>	<b>Description</b>	<b>ADAMS Accession No.<sup>(a)</sup></b>
11/03/2023	T. Smith (NRC) to R. Nelson, Executive Director, Advisory Council on Historic Preservation	Request for Scoping Comments	ML23289A115
11/03/2023	T. Smith (NRC) to W.E. Emerson, State Historic Preservation Officer	Letter Initiating Consultation and Request for Scoping Comments	ML23289A116
11/03/2023	T. Smith (NRC) to B. Harris, Chief, Catawba Indian Nation	Letter Initiating Consultation and Request for Scoping Comments	ML23289A117
11/03/2023	T. Smith (NRC) to M. Hicks, Principal Chief, Eastern Band of Cherokee Indians	Letter Initiating Consultation and Request for Scoping Comments	ML23289A117
11/03/2023	T. Smith (NRC) to D. Hill, Principal Chief, The Muscogee (Creek) Nation	Letter Initiating Consultation and Request for Scoping Comments	ML23289A117
11/03/2023	T. Smith (NRC) to C. Hoskin, Principal Chief, Cherokee Nation	Letter Initiating Consultation and Request for Scoping Comments	ML23289A117
11/22/2023	E. M. Johnson, Director of Historical Services, State Historic Preservation Office	Response to NRC Request for Scoping Comments	ML24037A319
05/17/2024	N. Martinez (NRC) to M. Rome (NRC)	Teleconference Summary with the South Carolina Department of Archives and History	ML24162A048
09/23/2024	M. Rome (NRC) to B. Harris, Chief, Catawba Indian Nation	Clarification of Area of Potential Effect	ML24221A207
09/23/2024	M. Rome (NRC) to C. Hoskin, Chief, Cherokee Nation	Clarification of Area of Potential Effect	ML24221A207
09/23/2024	M. Rome (NRC) to W.E. Emerson, State Historic Preservation Officer	Clarification of Area of Potential Effect	ML24221A207
09/23/2024	M. Rome (NRC) to D. Hill, Principal Chief, The Muscogee (Creek) Nation	Clarification of Area of Potential Effect	ML24221A207
09/23/2024	M. Rome (NRC) to R. Sneed, Eastern Band of Cherokee Indians	Clarification of Area of Potential Effect	ML24221A207
10/25/2024	E.M. Johnson, Director of Historical Services, State Historic Preservation Office	Concurrence with Clarification of Area of Potential Effect	ML24308A006
10/28/2024	E. Toombs, Tribal Historic Preservation Office, Cherokee Nation Tribal Historic Preservation Officer	Acknowledgement of Clarification of Area of Potential Effect	ML24308A005

ADAMS = Agencywide Documents Access and Management System; NRC = U.S. Nuclear Regulatory Commission.  
 (a) Access these documents through the NRC's ADAMS at <https://adams.nrc.gov/wba/>.

1 **C.5 References**

2 36 CFR Part 800. *Code of Federal Regulations*, Title 36, *Parks, Forests, and Public Property*,  
3 Part 800, "Protection of Historic Properties." TN513.

4 50 CFR Part 402. *Code of Federal Regulations*, Title 50, *Wildlife and Fisheries*, Part 402,  
5 "Interagency Cooperation—Endangered Species Act of 1973, as amended." TN4312.

6 51 FR 19926. 1986. "Interagency Cooperation - Endangered Species Act of 1973, as  
7 amended." Final Rule, *Federal Register*, Fish and Wildlife Service, Interior; National Marine  
8 Fisheries Service, National Oceanic and Atmospheric Administration, Commerce. TN7600.

9 16 U.S.C. § 1536. Endangered Species Act, Section 7, "Interagency Cooperation." TN4459.

10 54 U.S.C. § 306108. National Historic Preservation Act Section 106, "Effect of Undertaking on  
11 Historic Property." TN4839.

12 Endangered Species Act of 1973. 16 U.S.C. § 1531 *et seq.* TN1010.

13 FWS and NMFS (U.S. Fish and Wildlife Service and National Marine Fisheries Service). 1998.  
14 *Endangered Species Act Consultation Handbook, Procedures for Conducting Section 7*  
15 *Consultation and Conference*. Washington, D.C. ADAMS Accession No. ML14171A801.  
16 TN1031.

17 Magnuson Stevens Fishery Conservation and Management Reauthorization Act of 2006. 16  
18 U.S.C. 1801 Note. Public Law 109-479, January 12, 2007, 120 Stat. 3575. TN7841.

19 NMSA (National Marine Sanctuaries Act). 2000. "National Marine Sanctuaries Act, Title 16,  
20 Chapter 32 § 1431 *et seq.* United States Code as amended by Public Law 106-513." Silver  
21 Spring, M.D. Available at [https://nmssanctuaries.blob.core.windows.net/sanctuaries-](https://nmssanctuaries.blob.core.windows.net/sanctuaries-prod/media/archive/library/national/nmsa.pdf)  
22 [prod/media/archive/library/national/nmsa.pdf](https://nmssanctuaries.blob.core.windows.net/sanctuaries-prod/media/archive/library/national/nmsa.pdf). TN7197.



1 **APPENDIX D**

2 **CHRONOLOGY OF ENVIRONMENTAL REVIEW CORRESPONDENCE**

3  
4 This appendix contains a chronological listing of correspondence between the U.S. Nuclear  
5 Regulatory Commission (NRC) and external parties as part of the agency’s environmental  
6 review of the license renewal application for Virgil C. Summer Nuclear Station, Unit 1 (V.C.  
7 Summer). This appendix does not include consultation correspondence or comments received  
8 during the scoping process. For a list and discussion of consultation correspondence, see  
9 Appendix C of this supplemental environmental impact statement. For scoping comments, see  
10 Appendix A of this supplemental environmental impact statement and the NRC’s “Scoping  
11 Summary Report” (Agencywide Documents Access and Management System [ADAMS]  
12 Accession No. ML24278A042; NRC 2024-TN10831). All documents are available electronically  
13 from the NRC’s Public Electronic Reading Room found at <https://www.nrc.gov/reading-rm.html>.  
14 From this site, the public can gain access to ADAMS, which provides text and image files of the  
15 NRC’s public documents. The ADAMS accession number for each document is included in the  
16 following table.

17 **D.1 Environmental Review Correspondence**

18 Table D-1 lists the environmental review correspondence, by date, beginning with the request  
19 by Dominion Energy South Carolina, Inc. to renew the V.C. Summer operating license.

20 **Table D-1 Environmental Review Correspondence for Virgil C. Summer Nuclear Station**

Date	Correspondence Description	ADAMS Accession No. or Federal Register Citing
08/17/2023	Dominion Energy – Application for Subsequent Renewal of Operating License for Virgil C. Summer Nuclear Station, Unit No. 1	ML23233A179
09/05/2023	Letter to E. Carr – Virgil C. Summer Nuclear Station, Unit No. 1 – Receipt and Availability of the Subsequent License Renewal Application	ML23235A037
09/11/2023	Dominion Energy; Virgil C. Summer Nuclear Station, Unit No. 1	88 FR 62409
10/11/2023	Letter to E. Carr - Virgil C. Summer Nuclear Station, Unit No. 1 – Determination of Acceptability and Sufficiency for Docketing and Notice of Opportunity to Request a Hearing	ML23275A014
10/16/2023	Subsequent License Renewal Application; Dominion Energy; Virgil C. Summer Nuclear Station, Unit No. 1	88 FR 71384
10/16/2023	Letter to E. Carr - Virgil C. Summer Nuclear Station, Unit No. 1 – Subsequent License Renewal Application Online Reference Portal	ML23284A179
10/27/2023	Letter to E. Carr - Virgil C. Summer Nuclear Station, Unit No. 1 – Notice of Intent to Prepare an Environmental Impact Statement and Conduct Scoping Process	ML23285A038
10/30/2023	Public Meeting Announcement: Environmental Scoping Meeting Related to the Virgil C. Summer Nuclear Station, Unit No. 1, Subsequent License Renewal Application	ML23300A117

1 **Table D-1 Environmental Review Correspondence for Virgil C. Summer Nuclear Station**  
 2 **(Continued)**

Date	Correspondence Description	ADAMS Accession No. or Federal Register Citing
10/30/2023	Public Meeting Announcement: Environmental Scoping Meeting Related to the Virgil C. Summer Nuclear Station, Unit No. 1, Subsequent License Renewal Application	ML23303A193
11/03/2023	Notice of Intent to Conduct Scoping Process and Prepare Environmental Impact Statement; Dominion Energy South Carolina; Virgil C. Summer Nuclear Station, Unit No. 1	88 FR 75627
11/09/2023	V.C. Summer Subsequent License Renewal Application Public Environmental Scoping Meeting Presentation	ML23312A020
11/14/2023	V.C. Summer Subsequent License Renewal Application Public Environmental Scoping Meeting Presentation	ML23313A129
12/06/2023	Meeting Summary: Public Scoping Meeting for the Environmental Review of the Subsequent License Renewal Application for Virgil C. Summer Nuclear Station, Unit No. 1	ML23331A789
04/19/2024	Letter to E. Carr - Virgil C. Summer Nuclear Station, Unit No. 1 – Regulatory Audit Regarding the Environmental Review of the Subsequent License Renewal Application	ML24108A039
07/05/2024	Letter to E. Carr - Virgil C. Summer Nuclear Station, Unit No. 1 – Summary of the May 2024 Environmental Audit Related to the Review of the Subsequent License Renewal Application Environmental Report	ML24162A279
08/05/2024	Dominion Energy Response to V.C. Summer Subsequent License Renewal Environmental Report Requests for Additional Information and Requests for Clarification	ML24218A300
10/01/2024	Notice of Intent To Prepare Environmental Impact Statement; Dominion Energy South Carolina, Inc.; Virgil C. Summer Nuclear Station, Unit No. 1	89 FR 79975

ADAMS = Agencywide Documents Access and Management System; Dominion = Dominion Energy South Carolina, Inc.

<b>NRC FORM 335</b> (12-2010) NRCMD 3.7	<b>U.S. NUCLEAR REGULATORY COMMISSION</b>		<b>1. REPORT NUMBER</b> (Assigned by NRC, Add Vol., Supp., Rev., and Addendum Numbers, if any.)				
<b>BIBLIOGRAPHIC DATA SHEET</b>			NUREG-1437, Supplement 15, Second Renewal				
<i>(See instructions on the reverse)</i>							
<b>2. TITLE AND SUBTITLE</b>	Generic Environmental Impact Statement for License Renewal of Nuclear Plants, Supplement 15, Second Renewal, Regarding Subsequent License Renewal of Virgil C. Summer Nuclear Station, Unit 1		<b>3. DATE REPORT PUBLISHED</b>				
			<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; text-align: center;">MONTH</td> <td style="width: 50%; text-align: center;">YEAR</td> </tr> <tr> <td style="text-align: center;">November</td> <td style="text-align: center;">2024</td> </tr> </table>	MONTH	YEAR	November	2024
MONTH	YEAR						
November	2024						
			<b>4. FIN OR GRANT NUMBER</b>				
<b>5. AUTHOR(S)</b>	See Chapter 6		<b>6. TYPE OF REPORT</b>				
			Technical				
			<b>7. PERIOD COVERED</b> (Inclusive Dates)				
<b>8. PERFORMING ORGANIZATION - NAME AND ADDRESS</b> (If NRC, provide Division, Office or Region, U. S. Nuclear Regulatory Commission, and mailing address; if contractor, provide name and mailing address.)							
Division of Rulemaking, Environmental, and Financial Support							
<b>9. SPONSORING ORGANIZATION - NAME AND ADDRESS</b> (If NRC, type "Same as above", if contractor, provide NRC Division, Office or Region, U. S. Nuclear Regulatory Commission, and mailing address.)							
Same as above							
<b>10. SUPPLEMENTARY NOTES</b>							
Docket No. 50-395; EISX-429-00-000-1723809600							
<b>11. ABSTRACT</b> (200 words or less)							
<p>The U.S. Nuclear Regulatory Commission (NRC) prepared this supplemental environmental impact statement (SEIS) in response to Dominion Energy South Carolina, Inc.'s application to renew the operating license for Virgil C. Summer Nuclear Station, Unit 1, (V.C. Summer) for an additional 20 years. This SEIS evaluates the environmental impacts of the proposed action and alternatives to the proposed action. Alternatives considered include: (1) natural gas, (2) new nuclear (small modular reactor), (3) natural gas and solar combination, (4) new nuclear and solar combination, and (5) not renewing the operating license (the no-action alternative). The NRC staff's preliminary recommendation is that the V.C. Summer subsequent license renewal is a reasonable option for energy-planning decision-makers.</p>							
<b>12. KEY WORDS/DESCRIPTORS</b> (List words or phrases that will assist researchers in locating the report.)			<b>13. AVAILABILITY STATEMENT</b>				
Dominion Energy South Carolina, Inc. Dominion Energy Virgil C. Summer Nuclear Station V.C. Summer VCSNS Draft Environmental Impact Statement National Environmental Policy Act (NEPA)			unlimited				
			<b>14. SECURITY CLASSIFICATION</b>				
			<i>(This Page)</i>				
			unclassified				
			<i>(This Report)</i>				
			unclassified				
			<b>15. NUMBER OF PAGES</b>				
			<b>16. PRICE</b>				



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**NUREG-1437  
Supplement 15  
Second Renewal, Draft**

**Generic Environmental Impact Statement for License Renewal of Nuclear Plants,  
Supplement 15, Second Renewal, Regarding Subsequent License Renewal  
of Virgil C. Summer Nuclear Station, Unit 1**

**November 2024**