UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

February 5, 2007

Mr. Jack Cushing
OWFN 11 F-1
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

RE: Final Environmental Impact Statement (FEIS) for an Early Site Permit (ESP) at the North Anna ESP Site – NUREG-1811 (North Anna ESP Project, CEQ No 20060524)

Dear Mr. Cushing:

Under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the above referenced FEIS. The FEIS was prepared to meet the requirements of NEPA and includes an assessment of the potential environmental impacts resulting from the U.S. Nuclear Regulatory Commission's (NRC) proposed action. EPA previously submitted comments on both the Draft and Supplemental Draft Environmental Impact Statements (DEIS) related to this same proposal. The information provided in the FEIS adequately responds to our previous comments.

The NRC's proposed action would include the issuance of an ESP to the project sponsor Dominion Nuclear North Anna, LLC for the suitability of the construction and operation of two 4,500 megawatt (Units 3 & 4) nuclear power units at the North Anna Power Station (NAPS), Mineral, Virginia. It is our understanding, based on discussions with your staff regarding NRC's regulations, that the ESP permitting phase is a preliminary one that may be followed by an application for a construction permit (CP) or a combined construction permit and operation license (COL). It is also our understanding that, in the event NRC proceeds to the CP and/or COL phase, NRC will undertake additional NEPA review associated with this project. Further, if Dominion Nuclear North Anna, LLC were to proceed with a CP or a COL application, it is our understanding that the subsequent NEPA review would include a statement of the purpose and need for the project and an assessment of alternatives.

The NAPS currently operates two 890 megawatt nuclear power units. The existing units (Unit 1 & 2) employ a once-through cooling system, drawing lake water from the 9,600 acre Lake Anna. The cooling system then discharges to three lagoons connected by a series of canals. Discharges to the three lagoons ultimately flow to Lake Anna. As result of comments received on the Draft Environmental Impact Statement (DEIS), NRC suggested changes to Unit 3, which, if constructed, would employ a cooling system that would use a closed cycle combination wet and dry cooling tower system, while Unit 4, if constructed, would employ a dry cooling system. The changes to Unit 3's cooling system from that described in the DEIS would significantly

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reduce demand for water withdrawals from Lake Anna, reduce waste heat discharge, and reduce fish impingement and entrainment due to the water withdrawals.

As described in the FEIS, the ESP would authorize a plant perimeter envelope that would potentially impact approximately 7.14 acres of wetlands, 5,500 linear feet of stream and 2.49 acres of open water. If Dominion Nuclear North Anna, LLC were to proceed with this project, EPA recommends that mitigation be considered for these impacts. All of the relevant resource agencies should be engaged early in the process of developing any mitigation package. EPA also recommends that the NRC include a commitment regarding this mitigation in any subsequent Record of Decision.

EPA appreciates the opportunity to review and comment on the FEIS, and looks forward to continued collaboration on this project. If you have any questions about this letter, please feel free to contact Mr. Kevin Magerr at (215) 814-5724.

Sincerely,

William Arguto
NEPA Team Leader

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