

## NAPSEIS Comment Resource

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**Sent:** Wednesday, April 23, 2008 8:39 PM  
**To:** NorthAnnaCOLAEIS Resource  
**Subject:** April 16 Meeting Comments on SEIS  
**Attachments:** NRC Public Meeting Re.doc

Attached please find my comments regarding the SEIS for the proposed 3rd reactor at NAPS.

Thank you.

Barbara J. Crawford  
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NRC Public Meeting Re: Revisiting the EIS (Environmental Impact Statement)  
April 16, 2008  
Louisa County High School  
6pm – 10pm

COMMENTS:

My name is Barbara Crawford and I live here in Louisa County, approximately 6 miles from the North Anna Nuclear Power Plant.

Based on my analysis, it is clear to me that the EIS which was prepared as part of the Early Site Permit (ESP) process needs to be re-visited because there have been significant changes and there are critical issues that were not considered or were dismissed as not relevant:

1. On-site storage of spent fuel rods

The EIS presumes that there will be a Federal Repository somewhere in this country to receive this very dangerous nuclear waste. In fact, as you all know, Yucca Mountain may well **never** open and therefore the new EIS needs to study the health and safety ramifications of what will be permanent and long- term storage at North Anna for all three reactors.

2. Mass Evacuation Plan

The EIS is silent concerning the evacuation of the public in the event of an accident or terror attack on the plant, the pools of spent fuel rods or the Lake Anna Dam, any of which could result in the release of dangerous amounts of radiation.

The citizens of Louisa County as well as all of the surrounding counties are entitled to know about and participate in the plans for a mass evacuation of this area. The plan should be evaluated as part of the new EIS.

3. Central VA and especially Louisa County is notoriously drought-prone and water-poor and Lake Anna is already struggling to sustain Reactors 1&2 and protect those who live, work and recreate on and around the lake.

Dominion based its location of the power plant on the assumption that there would be a drought every 20 years or so. In fact we have had 3 major droughts in the past 9 years! We are currently experiencing a drought that began last May and shows no signs of abating. There are predictions from the weather experts that this drought will continue through this spring and summer.

Lake Anna's lake level has dropped in excess of 2 feet in 5 of the past 8 years. This fact alone suggests that the EIS needs to be revisited. The NRC needs to stop passing the buck to the state of Virginia and ignoring the water crisis.

The previous EIS gave this issue short shrift, stating that it's Virginia's problem and that our DEQ (Dept of Environmental Quality) can simply order Dominion to shut down one or more reactors in the event of low water! Does it make sense to build yet another reactor? What are the chances that all 3 reactors will even be able to operate at the same time?

4. The proposed 3<sup>rd</sup> reactor **will** contribute to further low levels at the lake, contrary to Dominion's statements that the hybrid cooling system will not use additional water. According to Dominion's own numbers, the proposed cooling system will cause up to 24 million gallons of water to evaporate every day.

Again, given that Lake Anna is struggling to sustain 2 reactors and that the ongoing low water levels are causing a myriad of problems for the people who live and work at the lake as well as the many people of the county and beyond who use Lake Anna for boating, fishing, swimming, etc., does it really make sense to build another reactor there?

The previous EIS looked at the 3 counties bordering the lake, plus Henrico County and the City of Richmond. Considering that the water that flows over the dam goes into Hanover County and that Hanover County is dependant on that water for sewage treatment plants, private businesses such as Big Bear Paper Co. and Kings' Dominion, and the health and recreation uses of the North Anna and Pamunkey Rivers, I would argue that the new EIS should take a close and hard look at the impacts on that county. The LLCPP or Lake Level Contingency Plan is a fragile and contentious balance between Louisa County and Hanover County and reflects the competing needs for water.

5. It is important to remember that the lake was not just built for Dominion to use to cool its power plant. The enabling legislation set forth very clearly that Lake Anna was also created as a recreational lake for the public to enjoy. One use is no more important than the other. And one use, e.g. cooling the reactors, cannot be allowed to destroy the lake's recreational use.

You will hear from others tonight about the serious problems being encountered right now on the lake because of the low lake levels.

It is important to bear in mind that when Lake Anna was created, neither Dominion nor any governmental body, whether federal, state or local, in any way discouraged the public from purchasing land and building homes around the lake. I would argue that there therefore exists a responsibility to those homeowners to protect them from adverse impacts of the power station.

6. The previous EIS stated that there were no new or anticipated residential, business or commercial demands on the watershed near the plant.

This is incorrect. It was known, or should have been known based on documentation submitted to you, that there are 3 significant residential developments in the works, including Cutalong which is building a golf course that will require significant water withdrawals from Contrary Creek, one of the feeder streams for the power plant. Note that the DEQ has recommended this permit be granted.

In addition, there are at least 3 businesses, that I know of, near the plant that require significant water use: Argonaut, Martin Marietta, and a shopping center with supermarket at Cutalong, all of which require water in order to operate.

Again, the new EIS needs to look closely at these competing demands for water in an area that has very little of it. The new EIS needs to reevaluate the availability of water for a 3<sup>rd</sup> reactor.

7. The IFIM Study will be completed in June and should be studied and analyzed as a part of the new EIS.

Dominion has been directed to conduct a scientific study called the Instream Flow Incremental Methodology study. DEQ, DGIF and DCR are providing input and supervision. This study looks at both Lake Anna and the downstream rivers (North Anna and Pamunkey) and will provide much guidance and valuable information which needs to be evaluated before a COLA can be granted.

8. The previous EIS calls the impacts of building a new reactor on Louisa County's infrastructure "small". This is absurd and must be revisited as part of the new EIS.

This is not a wealthy county. Our schools will be overwhelmed and unable to serve the children of the estimated 5000 workers who would be employed for a

period of five years to build the 3<sup>rd</sup> reactor, in addition to the 850 people who work there now and the special crews that come to North Anna for the intermittent outages.

Our roads are narrow, winding, 2-lane and unable to handle the new traffic. The construction equipment and materials would be heavy and damaging. Dominion has been directed to conduct a Traffic Impact Analysis. Have they done this? The results should be made available to the public. The new EIS should evaluate the results and set forth exactly what improvements Dominion will be expected to make.

9. Last November the NRC held a public meeting here at which time you informed us that you had sent our Potassium Iodide pills to the VA Dept of Health. That apparently satisfies your obligation to protect us. BUT, you should know that we have **not** received our pills! You may want to re-evaluate your methods of delivering this important safety measure.
  
10. Last but not least, Global Warming must be considered as part of the new EIS. We are seeing evidence that the effects are taking place much more quickly than previously thought.

We have heard the scientists employed by the current administration testify before Congress that they have been muzzled by the Bush administration for the past 8 years, their reports redacted and their speaking engagements curtailed.

Today, even President Bush talked about Global Warming and reducing greenhouse gas emissions by 2012. Of course it should be noted that he is about to leave office and the burden of making up for his failure to deal seriously with this issue will fall upon the new president.

Accordingly, I urge the Nuclear Regulatory Commission to revisit the EIS that was prepared as part of the ESP process for all of the reasons that I have outlined in this statement.

Respectfully Submitted,

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