

**TURKEY POINT NUCLEAR GENERATING UNITS 3 AND 4 (TURKEY POINT)
SUBSEQUENT LICENSE RENEWAL APPLICATION (SLRA)
FOLLOW-UP REQUESTS FOR ADDITIONAL INFORMATION (RAIS)
ENVIRONMENTAL**

SET 3

1. Historical and Cultural Resources

HC-7-a Title 10 of the *Code of Federal Regulations* (10 CFR) Section 51.53(c)(3)(ii)(K) states that “[a]ll applicants shall identify any potentially affected historic or archaeological properties and assess whether any of these properties will be affected by future plant operations and any planned refurbishment activities in accordance with the National Historic Preservation Act.”

In response to U. S. Nuclear Regulatory Commission staff's (NRC staff's) Request for Additional Information (RAI) HC-7 (RAIs: Agencywide Documents Access and Management System (ADAMS) Accession No. ML18190A499; Florida Power and Light's response: ADAMS Accession No. ML18247A507), Florida Power & Light Company (FPL) identified that within the 9,460-acre Turkey Point site exist three (3) wooden structures that were part of a Boy Scout Camp, and a cottage (known as the Ranger House or the McGregor Smith Cottage). The response states that there is no known historical significance of the three Boy Scout structures, and that they do not appear to meet the criteria for listing in the National Register of Historic Places (NRHP). However, the RAI response also states that these three structures have not been evaluated for NRHP eligibility and information about these structures has not been recorded by an architectural historian that meets the Secretary of Interior standards.

Regarding the McGregor Smith Cottage, the RAI response indicated that the cottage does not appear to have distinguishing features, and its association with McGregor Smith is unknown. The RAI response further indicated that although FPL initiated activities in 2012 to determine the eligibility of the cottage for historic landmark status and potential restoration, a NRHP determination has not been completed. The NRC staff subsequently identified the possible existence of a report prepared by David Baber, Architectural Historian, Historic Preservation Solutions, LLC, regarding the McGregor Smith Cottage Preservation Project that analyzes the historical context of the cottage. This report may provide insight as to the eligibility of the cottage for listing in the NRHP. The NRC staff does not have a copy of this report.

According to Protection of Historic Properties regulations in 36 CFR 800.4(c), the NRC is required to determine whether the three Boy Scout structures and the McGregor Smith Cottage are historic properties eligible for listing in the NRHP in accordance with criteria in 36 CFR Part 63. In addition, regulations in 36 CFR 800.1(c), Timing, states,

Enclosure

“The agency official must complete the section 106 process ‘prior to the...issuance of any license.’”

1. On August 28, 2018 the NRC staff held a Category 1 public meeting with FPL to discuss the responses provided in HC-7. Provide the following information discussed during the meeting:
 - A. The association of McGregor Smith and the cottage (e.g., use of the cottage by McGregor Smith and lands as a communal retreat). Clarify if the use of the cottage by McGregor Smith was during construction of Units 1, 2, 3, or 4. Include the age of the cottage in the response.
 - B. The reason that FPL sought landmark status with Miami-Dade County for the McGregor Smith Cottage (e.g., tax credit status and building code accommodations, age of the cottage, association with a significant figure).
 - C. Provide a copy of the McGregor Smith Cottage Preservation Project report, if available.
 - D. Regarding the Boy Scout structures, provide a basis and justification as to why the three structures do not appear to meet the criteria for listing in the National Register of Historic Places and how this determination was made. Include the age of the Boy Scout structures in the response.
2. To support NRC compliance with 36 CFR 800.4(c), provide any information you have (such as history, current and past use of the structures) regarding the potential eligibility of the three Boy Scout structures and the McGregor Smith Cottage for listing in the NRHP.

2. Water Resources (WR)

WR-2-a Section 51.45(b)(1) of 10 CFR requires, in part,

- (a) ...each applicant...shall submit with its application...one signed original of a separate document entitled "Applicant's...Environmental Report," as appropriate...
- (b) ...The environmental report shall contain a description of the proposed action, a statement of its purposes, a description of the environment affected, and discuss the following considerations:
 - (1) The impact of the proposed action on the environment. Impacts shall be discussed in proportion to their significance;

Specifically, relating to water resources, Section 51.53(c)(3)(ii)(C) requires:

(c) Operating license renewal stage.

- (3) For those applicants seeking...renewed license and holding an operating license...the environmental report shall include the information required in paragraph (c)(2) of this section subject to the following conditions and considerations:
 - (ii) The environmental report must contain analyses of the environmental impacts of the proposed action, including the impacts...of operation during the renewal term, for those issues identified as Category 2 [Groundwater use conflicts (plants that withdraw more than 100 gallons per minute [gpm])] issues in Appendix B to subpart A of this part. The required analyses are as follows:
 - (C) If the applicant's plant pumps more than 100 gallons (total onsite) of groundwater per minute, an assessment of the impact of the proposed action on groundwater must be provided.

FPL's supporting response to NRC RAI No. WR-2, included in L-2018-136 Attachment 43, Enclosure 20 (ADAMS Accession No. ML18247A507) indicates that "Marine" wells SW-1, SW-2, and PW-1 located on the Turkey Point peninsula have been in use as recently as August 2017, presumably to support cooling canal system freshening. While the Environmental Report states that the wells were installed in 2015 and produce saline water, little additional information is included on the three wells. Other available information indicates that at least one of the wells, PW-1, was constructed to support aquifer performance testing in 2009. In order to assess the environmental impacts of these wells, the staff needs additional information and clarification. Specifically, the NRC staff requests additional information on the construction of these wells including: verification of when each well was installed or converted for production purposes, well diameter, casing depth and type, total depth, open hole or screening interval (as applicable), and installed pump capacity.