

List of Submitted Contentions from Parties that Petitioned to Intervene in Docket No. 52-040 and 52-041, Florida Power & Light Company Combined License Application for Turkey Point Units 6 & 7

List of Submitted Contentions from Southern Alliance for Clean Energy (SACE), National Parks Conservation Association (NPCA), Dan Kipnis and Mark Oncavage:

1. The Environmental Report (the “ER”) fails to adequately address the direct, indirect, and cumulative impacts of constructing and operating radial collector wells on salinity levels in groundwater and surface water, and the resulting impacts to wildlife.
2. The ER fails to adequately address the direct, indirect, and cumulative impacts of the reclaimed wastewater system on groundwater, air, surface water, wetlands, and CERP.
3. The ER fails to adequately address the direct, indirect, and cumulative impacts of constructing and operating the transmission lines associated with Units 6 and 7 on wetlands, wildlife, and CERP.
4. The ER fails to adequately address the direct, indirect, and cumulative impacts of constructing and operating the access roads associated with Units 6 & 7 on wetlands and wildlife.
5. The ER fails to adequately address (1) all reasonable alternatives to the proposed transmission line corridors and associated access roads, and (2) how FPL will avoid and/or minimize impacts to wetlands caused by construction and operation of these transmission line corridors and associated access roads.
6. The ER fails to adequately address the cumulative impacts of constructing and operating Units 6 and 7 on salinity levels in groundwater, surface water, Biscayne Aquifer, and Biscayne Bay; wetlands; and wildlife.
7. The ER fails to adequately address the direct, indirect, and cumulative impacts of sea level rise on the construction and operation of Units 6 & 7 and the ancillary facilities.
8. The ER fails to adequately address the need for power. In particular, whether the ER failed to consider the drop in electricity demand in FPL’s service area since 2008, and relied upon erroneous claims that state and regional evaluations satisfy NUREG-1555.
9. The ER fails to adequately address all reasonable demand side management (“DSM”) and renewable energy alternatives to construction and operation of Units 6 & 7.

• See 8/17/10 petition:

http://www.cleanenergy.org/images/testimony/F_Petition%20to%20Intervene_TP6&7_081710.pdf

• See 10/1/10 reply brief:

http://www.cleanenergy.org/images/testimony/TurkeyPtCOL_SACEetalReply_100110.pdf

Contacts for SACE et al:

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• Dan Kipnis (“Captain Dan”), Resident of Miami Beach, life long angler on Biscayne Bay, kipnisd@atlanticbb.net, (H) 305-672-3807, (cell) 786-325-8518

• Mark Oncavage, Resident of Miami and active member of various conservation organizations, oncavage@bellsouth.net, (H) 305-251-5273

List of Submitted Contentions from CASE/Citizens Allied for Safe Energy, Inc.

1. Failure and omission of the FPL COL for the proposed Turkey Point Nuclear Reactors 6 & 7 to provide for an adequate public safety plan.
2. Failure and omission of the FPL COL for the proposed Turkey Point Nuclear Reactors 6 & 7 to provide for the safe and orderly evacuation of the population during or following a nuclear event (unusual nuclear occurrence).
3. Failure and omission of the FPL COL for the proposed Turkey Point Nuclear Reactors 6 & 7 by releasing aerosol with 471.6 tons of particulates into the atmosphere annually.
4. Failure and omission of the FPL COL for the proposed Turkey Point Nuclear Reactors 6 & 7 to adequately consider and plan for accidents involving radioactive materials.
5. Failure and omission of the FPL COL for the proposed Turkey Point Nuclear Reactors 6 & 7 analysis to consider or incorporate any scientifically valid projection for sea level rise and climate change through the end of this century and beyond.
6. Failure and omission of the FPL COL for the proposed Turkey Point Nuclear Reactors 6 & 7 to consider the environmental impact of extended storage of so-called "low-level" waste at Turkey Point as regard to public safety.
7. Failure and omission of the FPL COL for the proposed Turkey Point Nuclear Reactors 6 & 7 to consider including a so-called "low-level" radioactive waste extended storage plan.
8. A request that NRC deny the request from FPL to begin construction of the non-nuclear portions of this project (Limited Work Authorization LWA).

Contact for CASE:

• CASE/Citizens Allied for Safe Energy, Inc., Barry White, 305-505-9011, bwtamia@bellsouth.net, <http://www.case-fl.org/>

List of Submitted Contentions from the Village of Pinecrest:

1. FPL's Environmental Report (ER) fails to sufficiently describe the impact of construction and operation of the proposed nuclear generating units on local surface waters and groundwater so that the Commission can prepare an adequate Environmental Impact Statement (EIS) and propose adequate mitigation alternatives in its Environmental Protection Plan required under NEPA.
2. FPL's ER fails to adequately address the potential safety impacts certain of its proposed transmission facilities might have on Village emergency operations by failing to specifically address how or to what extent they might interfere with law enforcement and emergency response communications occurring within proposed transmission corridors.
3. FPL's proposed East Corridor for associated 230k V transmission facilities has an economic impact on the Village of Pinecrest, which is out of proportion with any benefit the proposed Turkey Point Units 6 & 7 and all associated facilities might have for the Village and its residents.

Contact for Village of Pinecrest:

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