

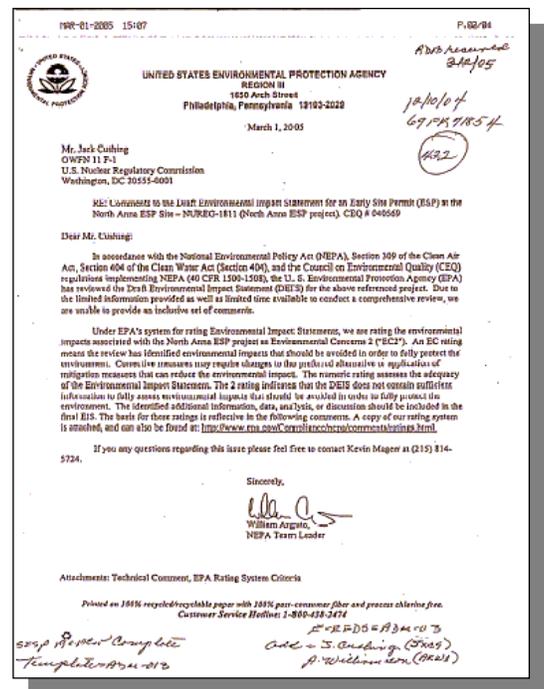


# An Independent View of the North Anna Draft EIS

On December 7, 2004, the U.S. Nuclear Regulatory Commission (NRC) issued a draft Environmental Impact Statement (EIS), its required analysis of the environmental effects of new nuclear reactors at Dominion's North Anna site in central Virginia. Dominion is in the process of applying for an Early Site Permit to site up to two new reactors on the shores of Lake Anna. While that document was presented as a detailed and comprehensive assessment, not everyone was thrilled with the results.

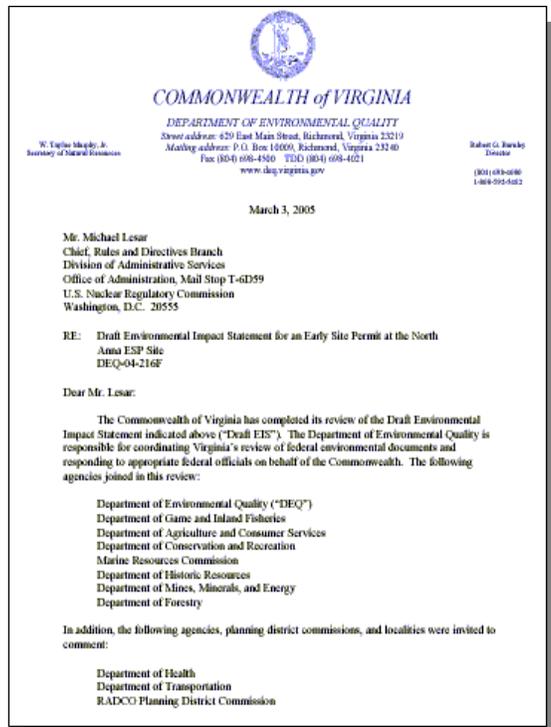
## THE U.S. ENVIRONMENTAL PROTECTION AGENCY SAYS:

- "The Purpose and Need of the Draft EIS does not include an assessment of the energy needs for the addition of two nuclear power units at the North Anna facility, nor does it assess other energy alternatives...EPA has concerns with this approach since it ignores the justification for the power plant addition in the early stage of project development as well as **biases the subsequent energy alternative analysis toward nuclear power** under the second EIS since the NRC would have approved the suitability under the ESP."
- "The DEIS **does not contain sufficient information** to fully assess environmental impacts that should be avoided in order to fully protect the environment."
- "There are **unresolved Air and Radiological issues** in the DEIS. The Air and Radiological Health Impacts are currently being reviewed by EPA...We request that these comments be considered during the Draft EIS phase of the project."
- "The twenty year horizon allotted under the proposed ESP **does not have any protective assurance** that unforeseen population growth and/or additional stressor on the Air or Water resources will be accounted for. Typically an action that has not occurred within three years of an EIS requires at minimum a supplemental EIS."
- "The Draft EIS does not...include any mitigation for the **loss of wetlands [or] streams.**"
- "The DEIS should include a comprehensive water budget."
- [On issues of fish kills and temperature changes in the lake] "It is **unclear** under the Draft EIS what was modeled, what were the results of the modeling and what was the mitigation, if any being proposed."



(March 1, 2005; NRC accession #ML050630407, or <http://www.citizen.org/documents/EPACommentsDEIS.pdf>)

## THE VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY SAYS:



- "DEQ's Division of Water Resources commented previously in regard to its concerns for the adequacy of Lake Anna as a source of cooling water for a third nuclear reactor; **these concerns remain.**"
- "The change to drought flows once every 2.6 years, for median duration of 7 weeks, is a significant change from conditions prior to the plant/reservoir construction (see item 4(b), below), and demonstrates the **need for cumulative analysis of impacts.**"
- "The fact that the fourth unit would be air cooled **does not allay the Division's concern** about the adequacy of Lake Anna as a water supply for third nuclear reactor."
- "Cumulative impacts of the current and future units on downstream hydrology and biology **need to be quantitatively evaluated** before any determination can be made that effects of the proposed addition of reactors to the site are 'small.'"

- "A cumulative analysis of impacts of the project does not start, in our judgment, with the existing lake conditions (i.e., the lake and two reactors) and then add, incrementally, the effects of operation of the proposed third reactor (so that the 'post-project' condition is the lake and three reactors). However, the Nuclear Regulatory Commission has accepted this approach, which means that a finding of no more than 'moderate' impacts of the third unit is not surprising even if **cumulative impacts have not been analyzed.**"
- "[Division of Water Resources] **disagrees with the conclusion** in the Draft EIS that these pre and post-project flow alterations and their impact can be described as small or moderate. Instead, DWR would characterize these types of alterations as **large.**"
- "At two meetings with DEQ staff, NRC officials were asked why North Anna rather than Surry was being proposed for an early site permit. On both occasions, NRC staff cited aesthetics and the fact that the plant might be visible from Jamestown. However, the Draft EIS, in its discussion of aesthetics, **does not indicate** that there is any problem with aesthetics at Surry."
- "DEQ's Division of Water Resources believes that the Surry site is '**superior**' (as described in the Draft EIS) to the North Anna site."
- "**No modeling** of summer striped bass habitat was conducted to support statements that the impacts would be small in normal years and moderate in drought years."

(March 3, 2005; <http://www.deq.virginia.gov/eir/documents/NorthAnnaESPDEIS.pdf>)

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