



LAKE HARTWELL ASSOCIATION, INC

VOGTLE ELECTRIC GENERATING PLANT UNITS #3 AND #4

A Position Paper of the Lake Hartwell Association

November 20, 2008

Southern Nuclear Operating Company (SNC) has applied for a permit from the Nuclear Regulatory Commission (NRC) to build and operate two new nuclear reactors for electric power generation at the Vogtle Site near Augusta, Georgia. Lake Hartwell Association has concerns about the proposed project that we believe must be addressed before NRC issues an operating license for the facility.

SNC currently operates two nuclear reactors at this site to generate power. SNC proposes to withdraw cooling water for the reactors from the Savannah River. The two new reactors will require that an additional 83.2 million gallons per day be pumped from the river and 41.6 million gallons per day would be returned to the river. The balance of 41.6 million gallons per day would be evaporated in the cooling towers to the atmosphere. When fully operational, the four reactors will normally consume 3.4 % of the river flow at Drought Level 3 flow conditions (3800 cfs) and 1.5 % at average flow conditions. This consumptive use of the Savannah River will have a negative impact on the level of Hartwell Lake during drought conditions.

The Lake Hartwell Association is not opposed to the operation of nuclear generating facilities. Assuming the proposed power generation increase is required to meet regional demands, we believe that nuclear power generation will have the least adverse environmental impact of the viable alternatives. If a nuclear generating plant were not constructed, a coal-fired plant, with all of the attending environmental issues, would most likely be built to satisfy these needs. LHA believes that the reactor design for the Vogtle project must include the best available technology for reducing water consumption. Water use is critical during drought conditions and any significant consumptive use will impact lake levels as well as other critical basin water demands. Nuclear reactor technology is available which can significantly reduce water consumption for cooling purposes.

The environmental studies done by SNC and the Environmental Impact Statement subsequently issued by NRC did not address impacts to the Savannah River above Augusta, Georgia. Based on drought flow conditions which have occurred in the upper Savannah River Basin over the past

two years, additional water withdrawals below the reservoirs will negatively impact lake levels and will have adverse environmental impacts above Augusta. We believe that the Environmental Report prepared by SNC should be revised to include the entire Savannah River System and the Environmental Impact Statement by NRC should also be revised. Decisions regarding an operating license should be made only after this is completed.

During the construction phase of this project, large parts of the reactors will be shipped to the site by barge on the Savannah River. Barge traffic will require river flow significantly above the drought flow limits. LHA believes that during drought conditions releases from Thurmond should not be increased to support barge traffic. This also should be addressed in the SNC Environmental Report and in the NRC Environmental Impact Statement.

LHA does not believe that reasonable decisions regarding water allocation and use can be made in the absence of factual information and data. Neither the states of Georgia and South Carolina, nor the U. S. Army Corps of Engineers have ever studied or fully assessed current and future water demands throughout the Savannah River Basin. To satisfy these needs two important actions need to be taken. These are:

1. Assessment of water needs and demands in the Savannah River Basin for the next 20 to 50 years.
2. Agreement between Georgia and South Carolina on water allocation to satisfy these demands.

A Comprehensive Water Resources Management Study prepared by the U. S. Army Corps of Engineers was to address the overall water issues in the SRB. Phase I of this study has been completed. The second phase of the study has not been completed due to lack of funding. LHA believes that Phase II should be completed to facilitate decisions on basin water use. If SNC wishes to expedite the permitting process, LHA recommends that they fund Phase II of this study.

LHA believes that the USACE Drought Contingency Plan is inadequate to deal with current and future forecasted drought conditions in the upper Savannah River Basin. A revised plan with guidelines for operation and management of Thurmond, Russell and Hartwell Lakes needs to be developed. This plan must include conservative assumptions for future climate change, must satisfy the needs of all current and future users, and will require adaptive management techniques. An operating permit for Vogtle Units #3 and #4 should not be issued until it is determined that adequate water is available during drought conditions or as an alternative the permit should require reactor shutdown during specified drought conditions.

After completion of these additional studies and design changes, the LHA Board of Directors would again review the supporting documents to assess our position relative to this specific project.