



April 18, 2016

Sarah E. Feinberg  
Administrator  
Federal Railroad Administration  
West Building  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Stephen G. Burns  
Chairman  
Nuclear Regulatory Commission  
One White Flint North Building  
11555 Rockville Pike  
Rockville, MD 20852

William Craig Fugate  
Administrator  
Federal Emergency Management Agency  
Federal Center Plaza  
500 C Street, SW  
Washington, DC 20472

Jim Boxold  
Secretary  
Florida Department of Transportation  
605 Suwannee Street  
Tallahassee, Florida 32399

Bryan Koon  
Director  
Florida Division of Emergency Management  
2555 Shumard Oak Boulevard  
Tallahassee, Florida 32399

**Re: St. Lucie Nuclear Power Plant and Increases in Rail Traffic on the FECR Tracks**

Dear Administrator Feinberg, Chairman Burns, Administrator Fugate, Secretary Boxold and Director Koon:

I am writing on behalf of Citizens Against Rail Expansion in Florida (“CARE FL”), a coalition of concerned community leaders, organizations and neighbors in South Florida and the Treasure Coast that is opposed to the proposed All Aboard Florida (“AAF”) passenger rail project and related increases in freight rail traffic. CARE FL considers the AAF proposal—which includes 32 new passenger trains per day, and related increases to the number and length of existing freight trains—a serious threat to the safety, welfare and quality of life of citizens in our communities.

Recently, it has come to CARE FL’s attention that the increased passenger and freight rail traffic associated with the project could jeopardize the safe operation of the St. Lucie Nuclear Power

Plant (the “Nuclear Power Plant” or “Plant”) under certain circumstances described below. Additionally, it could impact current evacuation plans. The Plant is a twin nuclear power station located on Hutchinson Island, near Port St. Lucie in St. Lucie County, Florida. It sits less than two miles across the intercoastal waterway from the Florida East Coast Railway (“FECR”) tracks.

The AAF Final Environmental Impact Statement (“FEIS”)—released by the Federal Railroad Administration (“FRA”) on August 4, 2015—does not address the issue of the St. Lucie Nuclear Power Plant at all. Furthermore, to the best of CARE FL’s knowledge, the only reference to any sort of safety/hazard analysis on the part of AAF is on page 1-23 of the FEIS: “Consistent with FRA safety requirements, which are not part of the NEPA process, AAF will develop a Hazard Analysis and System Safety Program Plan prior to the start of operations.”

We have no idea if AAF has developed this analysis and safety plan, but it appears such a plan would be needed before any operation of AAF commences. CARE FL believes these issues must be addressed by the railroad and the relevant federal and state officials in advance of these rail traffic increases, before construction commences, in a manner that is far clearer than the FEIS’s vague promise to develop a hazard analysis at a later date.

CARE FL’s concerns include the lack of any publicly visible coordination on the part of AAF/FECR to address these issues with your agencies. We do not consider the St. Lucie Nuclear Power Plant to be in any way at fault with respect to addressing the impact from these significant proposed increases in rail traffic. If AAF/FECR has addressed this issue directly with your agencies, CARE FL respectfully requests that you provide the public with confirmation of such efforts.

### **Updating Evacuation Plans Due to an Event at the Nuclear Power Plant**

First, CARE FL has serious concerns about the impact of the rail expansion on the St. Lucie Nuclear Power Plant’s evacuation plans, should the AAF project become a reality. While this letter is not focused on the laws and regulations governing the Plant and its safety, it is our understanding that the NRC’s emergency plan requirements are set forth under 10 CFR 50.47. Given that the Plant’s original evacuation plans were probably based on an assumption that only freight traffic would be on the railroad tracks, it would seem that this is a critical juncture at which to update emergency response plans. The introduction of passenger rail traffic and significant increases in freight traffic add an entirely new dimension to the Plant’s safety analysis and evacuation needs.

At-grade rail crossings must be open to vehicle and pedestrian traffic during an evacuation, which will cause any AAF/FECR trains in the area to stop within the evacuation zone. With respect to vehicle traffic on the roads during an evacuation, how will the increase in rail traffic—both freight and passenger—compromise the current evacuation requirements? Any freight trains in the area—which are far longer than passenger trains—could potentially block critically needed crossings during an evacuation. How will this be addressed, particularly given that FECR plans to increase the number of freight trains from 14 to possibly 20 trains per day, along with an increase in the average train length to 8,150 feet? In addition, where will these freight

trains be parked during such an emergency, so that they will not hinder vehicular access to the grade crossings within the evacuation zone or block fire, police, ambulance and other vital services? Furthermore, in the event of an accident at the Nuclear Power Plant, how will AAF passengers be evacuated should a train be within the evacuation zone?

### **Planning for Freight Rail Accidents Affecting the Nuclear Power Plant**

Second, CARE FL is concerned about the potential of a chemical release or explosion due to a freight rail accident that could affect the Nuclear Power Plant. With the potential addition of passenger trains, the possibility of a freight train accident (with trucks, vehicles or other trains) increases. The risk of an adverse event occurring on the tracks near the Plant will also increase given the proposed increase in the number and length of freight trains, which often carry hazardous materials. CARE FL considers it quite troubling that the possibility of a collision between a freight train and a passenger train is something that could not have previously been considered.

CARE FL recently commissioned Mr. Doug Wolfe of Response Technologies Corporation to conduct a plume analysis to determine how the Nuclear Power Plant would be affected by a potential chemical event occurring on the FECR tracks. Mr. Wolfe used standard software programs from the U.S. Environmental Protection Agency (“EPA”) utilized by fire houses all over the U.S. to predict chemical movement, based on chemical properties, toxicity, weather conditions and release rate. The models were broken down by three “threat zones”—yellow, orange and red—ranging from notable discomfort to life-threatening adverse effects and death. (Please see attached for Mr. Wolfe’s chemical event analysis.)

The analysis of an event occurring across the waterway from the St. Lucie Nuclear Power Plant showed that should such a chemical release occur during a rail accident, and should the wind be blowing in the direction of Hutchinson Island, the Plant would be in the orange and red threat zones where death or serious injury could occur, necessitating the need for its control room to be sealed off to prevent any contamination from the outside. CARE FL expects that nuclear power plants have capacity to sustain operations without access to outside air for a period of time, and even days. However, in light of the increased possibility of hazardous freight rail accidents occurring on the FECR tracks, we believe the public needs to be assured that these plans have considered such an accident—one we hope will never occur.

Furthermore, the chemical event analysis demonstrates that an explosion from a freight rail accident on the FECR tracks could take down the 500kV power lines that cross the intercoastal waterway to serve the St. Lucie Nuclear Power Plant. Such a scenario would not only affect the power being generated by the Plant, but it also could impact the power being provided to the Plant to sustain safe operations. CARE FL believes this situation must be considered by the relevant federal/state agencies.

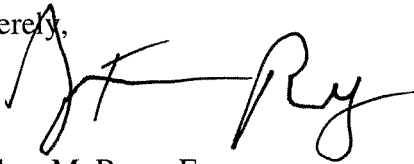
These two safety issues—the evacuation plan for the St. Lucie Nuclear Power Plant and the possibility of a freight train accident are legitimate concerns to CARE FL, citizens along the Treasure Coast and each of your agencies. While we understand that jurisdiction over these

issues resides with multiple federal and state agencies, we respectfully request answers to the following questions:

- **For an evacuation scenario, has the expansion of rail traffic—both freight and passenger—been taken into account?**
- **Has your agency been made aware of these changed safety threats due to an adverse event caused by AAF/FECR that affects the St. Lucie Nuclear Power Plant?**
- **What has your agency done, or what does your agency plan to do, in order to ensure the safety of St. Lucie County, Martin County and Indian River County citizens?**

CARE FL looks forward to learning about what each of your agencies is doing—or plans to do—with respect to these important safety issues. Thank you in advance for your reply. Should you have any questions, do not hesitate to contact me directly at [sryan@mwe.com](mailto:sryan@mwe.com) or 202.756.8333.

Sincerely,

A handwritten signature in black ink, appearing to read "S. M. Ryan". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Stephen M. Ryan, Esq.  
CARE FL Legal Counsel

Encl.