



FPL Energy

April 23, 2009

Steve Munro
California Energy Commission
1516 Ninth Street MS2000
Sacramento, CA 95814

Subject: Fire Protection System Building

Dear Mr. Munro:

FPL Energy is proposing to construct a new building within the plant boundary on the east side of the SEGS VIII cooling tower and relocate the three cooling tower deluge fire systems in this building. The facility operates under Conditions of Certification from the California Energy Commission (CEC). This submittal is intended to support the CEC's review and approval of the proposed project and CEC's determination of whether any changes to our Conditions of Certification are necessary.

Currently these systems are located in a fire protection building located west of the Power Block feedwater pumps. The underground piping from this building to the cooling tower is becoming corroded and unreliable. Due to the distance involved and the number of underground utilities that the plant has in this area, the safest and most economical method of correcting the piping issue is to relocate the deluge systems and tie into the existing systems along the east side of the cooling tower.

All applicable permits will be obtained for this project.

Environmental Impact:

1. **Summary:** The proposed project will not result in any significant adverse environmental impacts.
2. **Air Quality:** minimal short-term air quality impacts are possible during construction of the foundation, building and piping. Excavation will be necessary to tie into the existing fire protection system piping. The construction of the building and piping will take approximately two weeks to complete. Minor dust emissions and vehicle exhaust are possible during this period. FPL Energy will mitigate dust emissions using standard dust control practices, including watering. Further our practice is to ensure that minimal vehicle idling occurs, thereby minimizing vehicle exhaust. Furthermore, all equipment used on site is required to be in proper working order, including properly tuned engines. We believe these measures, coupled with the short-term nature of the construction, will result in air emissions that are not significant.
3. **Noise:** No significant noise impacts will result from the proposed project. Based on our knowledge of construction practices for buildings of this type, no activities

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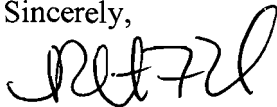
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associated with the project have the potential to generate significant noise levels at or beyond the facility boundary.

4. **Cultural Resources:** No adverse impacts on cultural resources (archeological or paleontological) will result from the proposed project. During CEC review of the original project, a complete paleontological survey was conducted on the overall project site. The supporting documentation is available in the project files on site if necessary. No cultural resources were identified within the plant boundary and the proposed project is located within the plant boundary. Furthermore, excavation, grading and other construction activities in the vicinity of the currently proposed project were carried out during the original construction of the project. Therefore, the area has already been disturbed, and no cultural resources were discovered during construction of the existing plant.
5. **Biological Resources:** No adverse impacts on biological resources will result from the proposed project. During CEC review of the original project a complete biological survey was conducted on the overall project. Desert tortoises are potentially present within the overall project area, but the plant boundaries are fenced to eliminate the possibility of tortoises straying into the plant. As part of our normal contractor orientation program, FPL Energy awareness training and information on the possible presence and the proper response to a sighting, per our existing Conditions of Certification.
6. **Visual Impacts:** No significant adverse visual impacts will result from the proposed project. The building is in a location that is shielded visually by other existing structures and equipment at the site, minimizing incremental visual impacts and rendering the proposed project insignificant with regard to the existing project profile.
7. **Hazardous Materials:** The proposed project will not result in any potential adverse environmental impacts associated with hazardous materials use.

Should you have any questions or require additional information please contact Glen King or myself at 760-762-3100.

Sincerely,



Robert Fimbres
Production Manager
SEGS VIII & IX