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Mike Blevins  
Senior VP & Chief Nuclear Officer  
Luminant Power  
P. O. Box 1002  
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76043

Dear Mr. Blevins;

I attended your presentation at the Brazos G Regional Water Planning Group meeting in Waco on October 24 of this year. I was hoping to find out what plans were for cooling the proposed new plants to be located at Squaw Creek Reservoir in Somervell County.

I was a little disappointed to hear Luminant plans to ask for 80,000 Acre Feet of Water per Year to be pumped from Lake Granbury to satisfy the proposed needs of the plant.

In the presentation concerning the Water Rights Permitting Process presented by Monica Jacobs, at the same meeting, she mentioned that all of the water rights had been spoken for in the State of Texas. This same theme was mentioned in the Texas Water Law Institute proceedings in 2006 presented by the University of Texas School of Law. There are a number of lawsuits in progress in Austin concerning water rights and they are mostly concerned with the distribution and control of what has become a limited resource.

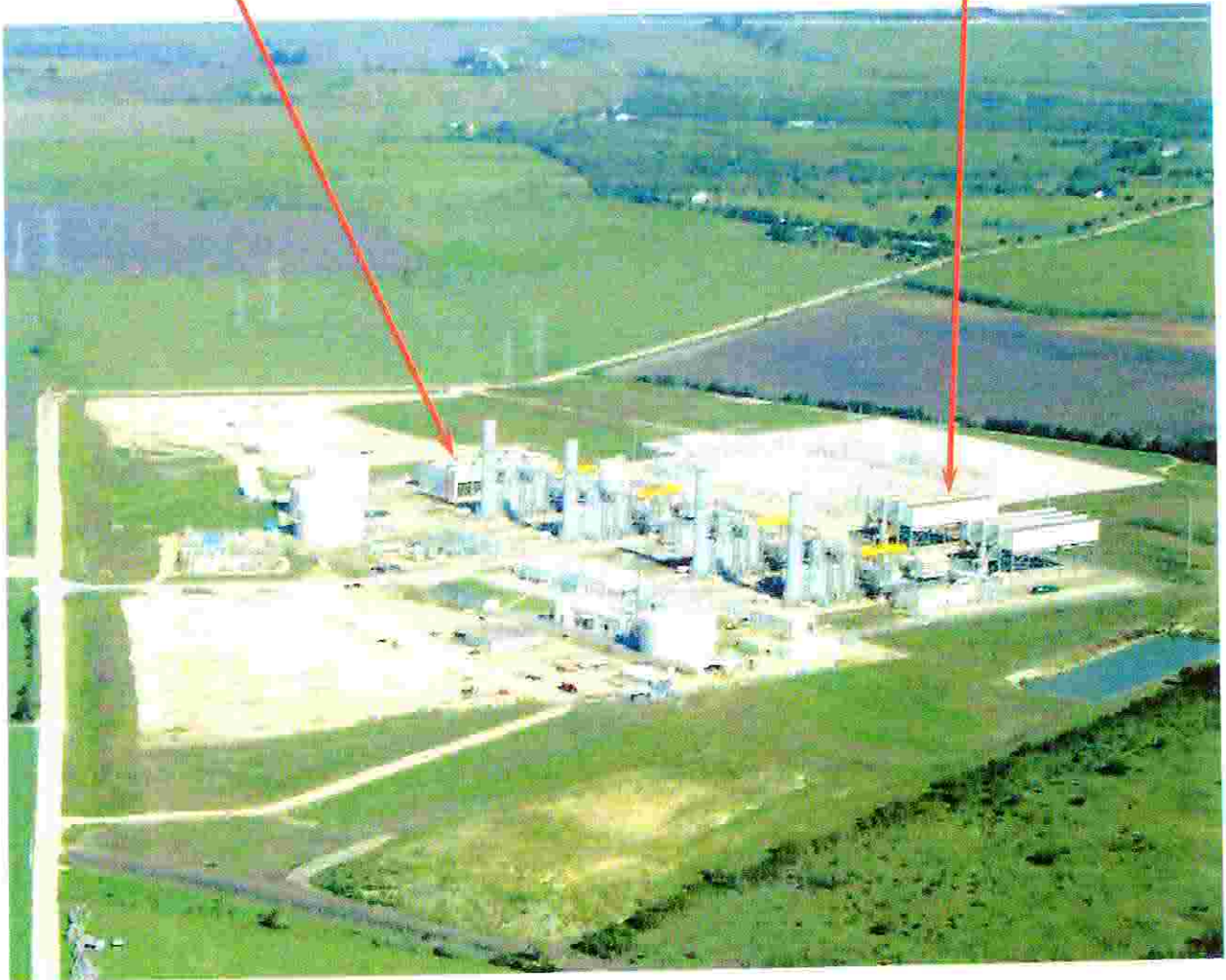
It is because of this concern that I have taken keyboard in hand to question the wisdom of using mechanical draft cooling towers at the proposed new plant. Air Cooled Condensers (ACC) are in use currently in the State of Texas. These devices were designed for arid regions.

Many of the lakes and reservoirs in Texas are man made. Texas has always recognized the need for water. Thanks to population growth and expansion of business it appears Texas has hit the wall on water allocation without depriving some entity of water.

It is for this reason I point out that Midlothian, Texas has six air cooled condensers at its combined cycle plant. The plant has an approximate capacity of 1600 Megawatts. In addition, at Hays County, there is a zero discharge combined cycle plant that uses two air cooled condensers in conjunction with two mechanical draft cooling towers. The mechanical draft towers are there to provide an evaporation capability to aid in meeting zero discharge requirements. Thus the technology to avoid using large quantities of water in evaporative (mechanical draft) cooling towers is available and in use.

Mechanical Draft Cooling Towers

Air Cooled Condensers



**Configuration at a Zero Discharge Plant  
in Hays County**

### Air Cooled Condensers Located at South End of Generating Units



### Six Air Cooled Condensers at a Combined Cycle Plant in Midlothian, Texas

The type of ACC used in Texas at the subject plants is a Balcke-Durr tower. This company has joined with some others and is now SPX Cooling. The web site can be accessed as follows;

<http://spxcooling.com/en/products/detail/air-cooled-condensers/>

It is in the greatest interest of industry, particularly the nuclear industry, to put their best face forward. It is obvious to me that Nuclear power is the top answer to the continuing needs of states with growing populations for electricity. I would hope the first attempts at revitalizing the industry would be approached with a fair mind and the wish to avoid controversy. It is in this interest I would ask that mechanical draft (evaporative) cooling towers not be used for the new expansion at Comanche Peak.

There is another Texas Water Institute continuing education course coming up at the University of Texas School of Law. It is scheduled for December 7<sup>th</sup> and 8<sup>th</sup>, 2007. It may be fruitful to have the appropriate parties in you organization attend. It is eye opening to hear where Texas is in regard to water rights and usage. This is their website;

[www.utcle.org](http://www.utcle.org)

I hope this finds you well and comfortable in Glen Rose.

Sincerely,



A. R. Martell, PE

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