April 29, 2004

Mr. Rod Krich, Vice President
Licensing, Safety, and Nuclear Engineering
Louisiana Energy Services
2600 Virginia Avenue NW, Suite 610
Washington, DC 20037

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION RELATED TO THE PREPARATION OF AN ENVIRONMENTAL IMPACT STATEMENT FOR THE LOUISIANA ENERGY SERVICES PROPOSED NATIONAL ENRICHMENT FACILITY

Dear Mr. Krich:

By letter dated December 12, 2003, as revised by letter dated February 27, 2004, Louisiana Energy Services (LES) submitted an application to the U.S. Nuclear Regulatory Commission (NRC) for a license to construct, operate, and decommission a gas centrifuge uranium enrichment facility near Eunice, New Mexico. In accordance with NRC regulations at 10 CFR Part 51 and the National Environmental Policy Act, the NRC staff is preparing an Environmental Impact Statement (EIS) on the proposed facility.

During its review of the application, questions have arisen requiring the NRC staff to request additional information and clarification. To the extent practicable, please provide an electronic version of your responses. The NRC staff also requests that any information which LES proposes to withhold from public disclosure as proprietary, be identified and submitted pursuant to the requirements of 10 CFR 2.390. The NRC staff requests that LES provide responses to the enclosed request for additional information as soon as possible, but no later than 15 business days from the date of this letter.

If you have any questions regarding the content of this letter, please contact me at (301) 415-6262.

Sincerely,

/RA/

Melanie Wong, Environmental Project Manager
Environmental and Low-Level Waste Section
Environmental and Performance
Assessment Project Directorate
Division of Waste Management
and Environmental Protection
Office of Nuclear Material Safety
and Safeguards

Enclosure: Request for Additional Information
Docket: 70-3103
cc: Service List

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Enclosure

Request for Additional Information

Louisiana Energy Services
National Enrichment Facility

The general requirements for an U.S. Nuclear Regulatory Commission (NRC) draft environmental impact statement (DEIS) are delineated in 10 CFR 51.70. Pursuant to 10 CFR 51.70(b), the NRC staff is required to prepare a DEIS that: (1) is concise, clear, analytical, and written in plain language, and (2) states how the alternatives considered in the DEIS and decisions based on it will achieve the requirements of Sections 101 and 102(1) of the National Environmental Policy Act. Appendix A of 10 CFR Part 51 describes the format the NRC staff will use in preparing the DEIS.

To prepare a DEIS consistent with the requirements of 10 CFR 51.70, certain information is required. To satisfy the information requirement, the applicant is required, in accordance with 10 CFR 51.45, to provide an environmental report (ER). The NRC staff is required to independently review the information in the ER and prepare a DEIS. The staff has reviewed the applicant's ER and determined that additional information is necessary to prepare a DEIS that satisfies the requirements of 10 CFR 51.70.

SECTION 1 - INTRODUCTION

Pursuant to 10 CFR 51.45(d), the ER is required to list all the Federal permits, licenses, approvals or other entitlements which must be obtained in connection with the proposed action.

1-1 Permits, Licenses, and Approvals:

A. Provide an update on the status of required permits, licenses and approvals, if available, for the construction and operation of the proposed National Enrichment Facility (NEF). For example, identify any specific air quality permits required by the State of New Mexico. Provide the bases for each such permits.

B. Identify any applicable New Mexico regulations, permits, licenses, or approvals that would be required because of the State Land Swap Arrangement.

- Section 1.2.1 states that the proposed NEF site is currently owned by the State of New Mexico and is being acquired by Louisiana Energy Services (LES) through a State Land Swap Arrangement.

C. Verify that the proposed septic tanks and leach fields would comply with applicable permits, licenses or approvals.

SECTION 2 - ALTERNATIVES

Pursuant to 10 CFR 51.45(b), the ER is required to contain a description of the proposed action and 10 CFR 51.45(b)(3) requires that the ER discuss the alternatives to the proposed action. The discussion of each alternative, including the proposed action, should be sufficiently complete to assist the NRC staff in developing and exploring appropriate alternatives.

2-1 Carbon Dioxide Line:

Provide a map or a figure to show the current CO_2 line location through the proposed NEF.

- Sections 2.1.2.1, 2.1.2.5, 4.1.1, and 4.1.2. state that the Trinity Pipeline, LLC, 10-in diameter, 2000 psi, underground CO_2 pipeline traverses southwest to northwest across the proposed NEF and would be re-routed but no maps show the current location of the pipeline.

2-2 Septic Tanks and Leach Fields:

Provide a detailed description of the septic tanks and leach fields.

- Section 2.1.2.5 states “three septic tanks with a common leach field will be installed onsite.” Sections 3.12.1.3.4 and 4.4.7 discuss the effluent discharge systems.

2-3 Treated Effluent Evaporative Basin (TEEB):

A. Provide specific information on the materials and construction methods to be used for the double-lined TEEB.

- Section 4.4.7 describes controls of impacts to water quality including the TEEB which is double-lined with leak detection equipment installed and open to allow evaporation.

B. Describe the methodology used to determine that the basin liner(s) would last the entire life of the proposed NEF.

C. Describe the proposed monitoring system used to determine whether the liner(s) has been breached. Provide specific information on the equipment and its alarm activation and operation system.

D. Describe the proposed mitigating actions to be implemented if the liner(s) fails.

E. Provide the process for decommissioning the TEEB and disposing of the soil and sludge as low-level waste.

- Based on Section 2.1.2.3.4, the TEEB soil/sludge would contain a complexing agent (citrate), uranium, and other decay product radionuclides from the 30 years of operation.

F. Identify the treatment method(s) used to treat the citrate in the liquid effluent prior to discharging it into the TEEB.

G. Verify that the amount of chelating agent (i.e., citric acid) in the TEEB's soil/sludge would be acceptable for low-level waste disposal.

2-4 Uranium Byproduct Cylinder (UBC) Storage Pad:

A. Provide additional information which resolves inconsistencies on the UBC storage pad construction.

- Section 1.2.3 states the UBC storage pad is designed to store up to 15,727 UBCs, or about 25 years worth (i.e., tails generation rate is 625-627 UBCs per year). This statement is inconsistent with Section 1.2 which states the proposed NEF would be licensed for 30 years of operation and Section 4.13.3.1.1 which states "the concrete pad to be initially constructed onsite for the storage of UBCs will only be of a size necessary to hold a few years worth of UBCs."

B. Provide the specific size and capacity for the initial concrete storage pad.

C. Identify the planned expansion dates for the storage pad and discuss the impact the periodic expansions of the storage pad would have on operation and maintenance activities.

D. Discuss the potential for regular periodic expansion of the UBC storage pad that could bring construction crews back onto the proposed NEF which could increase the number of personnel exposed to radiological and hazardous events.

- Section 4.13.3.1.1 states the depleted uranium would be temporarily stored onsite in containers on the UBC storage pad. The current schedule calls for completion of construction activities by 2013, which seems inconsistent with the regular periodic expansion of the UBC storage pad.

2-5 Depleted Uranium:

A. Provide LES's determination on whether the depleted uranium is a waste or a resource material.

- Section 4.13.3.1.3 notes that "NRC expects LES to indicate in its proposed NEF license application whether the depleted uranium tails will be treated as a waste or a resource" and that "LES will make a determination as to whether the depleted uranium is a resource or a waste and notify the NRC."

B. Provide an update on actions to identify and finalize a viable disposal path for the depleted uranium.

- Section 4.13.3.1.1 states that LES is committed to aggressively pursue economically viable disposal paths for the disposition of UBCs.

2-6 Construction and Operation Resources:

Provide a list of resources and materials that would be used, consumed, or stored at the proposed NEF during construction and operation.

- Section 2.1.2.3 describes the proposed NEF process, building and related operation. However, there is no information on the resources and materials that would be used, consumed, or stored at the proposed NEF during construction and operation. Materials may include steel, aluminum, asphalt, water, electricity, concrete, wood, fuel (diesel and gas), chemicals, etc.

2-7 Alternatives Sites:

A. Provide a sample calculation to allow the NRC to reproduce the site score results in Section 2.1.3.3.3.

- In Section 2.1.3.3.3, a summary is provided on how the site scores are calculated. Table 2.1-9 summarizes the unweighted scores of the sites against the second phase screening criteria. Figures 2.1-7 and 2.1-8 present the final weighted scores.

B. Clarify the Eddy County site's higher score under the air quality licensing criteria over the Lea County site.

- Table 2.1-9 states both the Lea County and the Eddy County sites are in the same air quality attainment area as defined by U.S. Environmental Protection Agency (EPA). The Eddy County site is closer to a larger population center (Carlsbad) than the Lea County site. The Eddy County site may be penalized for uncertainty in being available for siting the proposed NEF.

C. Verify that the description of the Eddy County site is accurate in Section 2.1.3.3.4.2.

- The written description of the location of the Waste Isolation Pilot Plant (WIPP) access road and utilities indicate that the correct site is Section 11 of Township 22S, Range 31E of the New Mexico Meridian which is northeast of the current WIPP site. Section 2.1.3.3.4.2 identifies the Eddy County site as Section 8 of Township 22S, Range 31E of the New Mexico Meridian which is near the northwest corner of the WIPP site.

D. Include in Figures 2.1-7 and 2.1-8 the score for the Portsmouth, Ohio site.

- Figures 2.1-7 and 2.1-8 present the final weighted scores of five of the six sites, omitting the score for the Portsmouth, Ohio site.

SECTION 3 - DESCRIPTION OF AFFECTED ENVIRONMENT

Pursuant to 10 CFR 51.45(b), the ER is required to contain a description of the affected environment.

3-1 Geology and Soils:

A. Provide information on the existing soil contamination due to chemicals at the proposed NEF.

- Section 3.3 discusses geological characteristics of the soil, but specific physical or chemical data is lacking.

B. Clarify whether Red Bed Ridge is associated with the Mescalero Escarpment or if it is the result of other structural/erosional activity in Section 3.3.

C. Clarify whether single values estimating the thickness of the geological units represent averages across the proposed NEF site in Table 3.3-1.

D. Provide the average value when a range of depth or thickness is stated for the various materials in Table 3.3-1.

E. Provide a range of values when a single value of thickness is stated.

3-2 Water Resources:

Provide an explanation for the units of the chemicals listed below U-238 in Table 3.4-3. Specifically, explain the use of negative values.

3-3 Air Quality and Meteorology:

Provide the correlation analyses of the meteorological data from the Midland-Odessa, Texas Airport with the Waste Control Specialists (WCS) meteorological data.

3-4 Ecological Resources:

A. Identify on a map the locations of the two Areas of Critical Environmental Concern (ACC) designated for the Lesser prairie chicken.

- Sections 3.5.2 stated that the Bureau of Land Management is in the process of designating two public land parcels within Lea County as ACC for the Lesser prairie chicken.

B. Provide a copy of the reference that was cited (Stinnett, 2002) in the ER.

C. Provide the results of any additional surveys conducted to identify habitat suitability, if any, and any mitigation measures that would be undertaken to reduce the impacts and protect the Sand dune lizard and Lesser prairie chicken.

D. Provide detailed information on the habitat and biology of the Black-tailed prairie dog.

- The U.S. Fish and Wildlife Service identified the Black-tailed prairie dog as a candidate species.

E. Determine if the proposed NEF site contains habitats that would be attractive to the Swift fox, the American peregrine falcon, the Arctic peregrine falcon, the Baird's sparrow, the Bell's vireo, the Western burrowing owl, and the Yellow-billed cuckoo.

F. Discuss the species listed above and their potential vulnerabilities to construction, operation, and decommissioning of the proposed NEF.

3-5 Socioeconomic:

Provide the tax revenue for Eunice, New Mexico and Lea County.

- Section 3.10 describes the tax methodology but does not provide the tax revenue.

3-6 Background Radiation:

Provide a summary table or chart which shows the normal background radiation levels for the area surrounding the proposed NEF site.

- Section 3.11 discusses the normal background radiation levels for the United States but lacks normal background radiation levels for the area surrounding the proposed NEF site.

SECTION 4 – ENVIRONMENTAL IMPACTS

Pursuant to 10 CFR 51.45(c), the ER is required to include an analysis that considers and balances the environmental effects of the proposed action, the environmental impacts of alternatives of the proposed action and alternatives available for reducing or avoiding adverse environmental effects.

4-1 Visual/Scenic Resources Impacts:

Provide a copy of the artistic rendering showing a view of the proposed NEF and how it would visually impact the site and surrounding area.

4-2 Water Resources Impacts:

A. Provide a complete water balance table identifying the estimated flow rates (maximum and minimum) discharged to each of the wastewater basins identified in Section 4.4.7 and the anticipated evaporation, soil adsorption, or evapotranspiration on a monthly basis.

B. Provide the basis for assuming that the sand and gravel layer at the surface is laterally and wholly indurated across the entire proposed NEF site.

- In Section 3.3, it appears there is an assumption being made that the sand and gravel layer at the surface is laterally and wholly indurated across the entire proposed NEF site. The limited information from the geotechnical borings does not support this assumption.

C. Discuss the contaminant pathways in a lateral direction to a groundwater source within the subsurface (i.e., contaminant migration beyond the bounds of the proposed NEF within the sand and gravel layer above the Chinle formation).

- Section 4.4.2 includes discussions on contaminant pathways only in a vertical direction to a groundwater source and not in a lateral direction within the subsurface.

D. Discuss the potential for water or other liquids from spills or pipeline leaks to migrate and flow along the base of the Chinle Formation.

- In the construction of the proposed NEF, the site would be subject to borrow and fill from onsite. The sand and gravel “fill” could be a pathway for water or other liquids from spills or pipeline leaks. The water or liquids may flow along the base of the fill area in an apparent southwesterly direction based on the slope of the Chinle Formation.

E. Provide any impacts to the surrounding land if the site stormwater retention basin overflows.

4-3 Socioeconomic Impacts:

A. Clarify the radius of influence (ROI) for the proposed NEF.

- Section 3.10 describes the radius of influence (ROI) as 120 km (75 mi), while it is described as 112 km (70 mi) in Section 4.10.

B. Explain how the projected population increases due to construction and operation would impact the ROI.

C. Provide a description of the potential impact of a similar population increase on the area within a reasonable commuting distance (e.g., 10 to 25 miles) of the proposed NEF.

- Sections 4.10.1.2 and 4.10.2.1 describe the impact of the anticipated population increase on the surrounding area. It states that the population increase from construction and operation workers would be less than a 1 percent increase over the existing population of Lea and Andrews Counties and therefore, have no significant impact on the area. However, it may be more reasonable to assume that both the construction and operation work forces that relocate to the area would move within the ROI rather than dispersing equally throughout the combined 15,268 km^2 (5,895 mi^2) area of Lea and Andrews Counties.

4-4 Air Quality Impacts:

A. Provide the XOQDOQ model input files used to generate the air quality impact data from the proposed NEF operation in Section 4.6.2.3.

B. Provide the calculations used in estimating the hydrogen fluoride and radiological releases from the proposed NEF during operation and decommissioning as identified in Section 4.6.

C. Provide specific information on the plume from the cooling tower as discussed in Section 4.6.3 including:
   1.) Height of plume,
   2.) Areal extent of plume,
   3.) Duration of plume, and
   4.) Extent and duration of fog from plume.

D. Provide the gaseous release points for each radionuclide (at least for the Technical Support Building Gaseous Effluent Vent System (GEVS), Separations Building GEVS, Confinement Ventilation System, and the Centrifuge Test and Post Mortem Facility unless other potential ventilation release points are identified). Information should include:
   1.) Exit area of the stacks,
   2.) Exit height of the stacks,

3.) Height of release buildings,
4.) Height of adjacent structure,
5.) Exit velocity of the stacks,
6.) Exit temperature of the stacks, and
7.) Annual released activity (µCi) by radionuclide including uranium daughters.

E. Provide the location, quantity, and source for the emission rates from the release points listed above at the proposed NEF during site preparation, construction, and decommissioning.

F. Provide emission factors, tons of daily emissions, number of vehicles and heavy duty engines, and estimated traffic increases during construction and operation.

4-5 Noise Impacts:

Predict the noise level at the proposed NEF boundary during construction.

4-6 Transportation Impacts:

A. Provide the following information for the shipments of supplies and materials to the proposed NEF and wastes from the proposed NEF during construction:
1.) Mode of shipment (rail, truck, etc.),
2.) The type of material,
3.) Origin or destination of each type of shipment (e.g., Lea County Landfill), and
4.) Estimated number of shipments by material type for each year of construction.

B. Provide for all radioactive shipments (e.g., feed material, product, depleted uranium, low-level waste, contaminated empty Type 48X, 48Y, and 30B cylinders, etc.) to or from the proposed NEF by truck or rail, the following information:
1.) Curie content by isotope,
2.) Radiation at 1 meter from the surface,
3.) Estimated number of annual shipments,
4.) Estimated number of packages per shipment,
5.) Air pollution impacts from normal transportation,
6.) Estimated number of traffic accidents,
7.) Radiological and/or chemical impacts from potential accidents, and
8.) Origin or destination of the shipments.

C. For all non-radioactive shipments (operating supplies, office products, chemicals, empty Type 30B cylinders, etc.) to the proposed NEF, provide the annual number of truck and rail deliveries and shipments expected during operation.

D. For all non-radiological waste shipments from the proposed NEF during operation, provide the following information:
   1.) Place of origin onsite and number of each type of waste shipment, and
   2.) Destination of waste, including current number of annual deliveries to the waste receiver and remaining capacity of the disposal sites.

E. Verify and provide an example of the calculations used to generate the dose equivalent of 9.47 rem to a driver during normal transport in Section 4.2.7.6.

- Sections 2.3 and 4.2.7.6 states that the annual dose equivalent for a truck driver during incident-free transportation is 9.47 rem. Regarding the feed shipments from Ontario, Section 2.3 does not state that the dose per shipment is a collective dose. However, Section 4.2.7.6 appears to indicate that the dose is collective, cumulative over the life of the proposed NEF, and based on 2 drivers per shipment.

4-7 Public and Occupational Health Impacts:

A. Provide a discussion on how the Urenco's Capenhurst Plant occupational exposures and occupational injury rates are valid for the proposed NEF.

- Section 3.11.2.1 states that "occupational injury rate at the proposed NEF is expected to be similar to other operating uranium enrichment plants." Table 3.11-1 provides lost time accidents at the Capenhurst Plant. Although the proposed NEF would be similar in operation to the existing Capenhurst Plant, the proposed NEF would produce twice as many SWUs as the Capenhurst Plant.

B. Identify whether the size of the onsite workforce at the proposed NEF would be the same as at the Capenhurst Plant.

C. Provide the level of education, experience, and safety training at the Capenhurst Plant.

D. Provide the education and safety training planned for the proposed NEF.

E. Provide a description of the column "Target Max LTAs" in Table 3.11-1.

F. Provide a discussion of the non-radiological accidents in Section 4.12.3 to the public, workers, and equipment or provide justification why no such discussion is needed.

G. Justify the assumption used in the liquid effluent dose assessment in Section 4.12.2.1.2 that "the TEEB is assumed to be dry no more than 10 percent of the time."

- The pan evaporation rate for southeastern New Mexico and western Texas is approximately 80 inches per year. From Figure 4.12-2, the areal extent of water in the TEEB is approximately 30,000 - 50,000 square feet. Therefore, the expected annual evaporation rate could be expected to remove at least 1,500,000 gallons per year from the TEEB. With an expected annual treated liquid effluent volume of not more than 670,000 gallons, the TEEB would likely remain mostly dry, rather than mostly wet. As a result, the sludge would be subjected to wind erosion and suspension more than 10 percent of the time.

4-8 Waste Management Impacts:

A. Describe the efforts planned to recover recyclable materials such as metals, papers, etc. during both construction and operation of the proposed NEF.

B. Provide external and internal effluent monitoring data for at least five years of operation at the Capenhurst and Almelo facilities for all waste streams (gaseous, liquid, and solid), if available. If data is available, adjust as appropriate for any operational differences between the Capenhurst and Almelo facilities and the proposed NEF.

- Sections 3.12 and 4.13 note that the proposed NEF would be similar in operation to the existing Capenhurst and Almelo facilities.

C. Provide all radionuclides and chemicals that are routinely monitored and any abnormal release measurements at the Capenhurst and Almelo facilities.

D. Provide the average, maximum, and minimum volumetric and uranic concentration and hydrogen fluoride concentrations over each annual year of data that are equivalent to the proposed NEF evaporative discharge and laundry liquid effluent streams from the Capenhurst and Almelo facilities.

E. Identify the specific regulations that would be followed for disposal of effluent materials unsuitable for the evaporative disposal or for release to the TEEB.

- Sections 3.4.1.2 and 4.4.7 state "... effluents unsuitable for the evaporative disposal will be removed off-site by a licensed contractor in accordance with regulatory requirements" and "effluents unsuitable for release to the TEEB are processed onsite or disposed of offsite in a suitable manner in conformance with pertinent regulations."

4-9 Decommissioning Impacts:

A. Provide an assessment of the potential radiological and non-radiological impacts that would be associated with the decontamination and decommissioning activities. This assessment should include:
   1.) Number of workers required for decommissioning,

2.) Change in worker qualifications for decommissioning versus operation,
3.) Number of low-level waste shipments to a disposal facility, and
4.) Number of normal trash and construction waste shipments.

B. Provide estimates of the deposition rate of uranium, fluorides, and other chemicals released from normal operation in the soil and the impacts of these accumulated depositions.

C. Identify the depth to which soil contamination may occur considering soil disturbances and wind erosion.

4-10 Waste Management Impacts:

A. Provide the details of the package types that would be used, shipment modes, and the quantity per shipment of each type of radioactive and mixed wastes and non-radiological wastes identified in Table 3.12-1 and Sections 3.12.2 and 4.13.4.2.

B. Provide the package surface dose rate and estimate the worker's exposure for processing, packaging, and shipping these waste streams.

4-11 Cumulative Impacts:

A. Provide the Walvoord and WCS referenced and unreferenced documentations for air (e.g., meteorological tower data), ground water (e.g., sample well information), and soil (e.g., soil analysis).

- Sections 3.3, 3.4, 4.4.2, and 4.6.4 cite or reference data obtained from WCS (such as Rainwater, 1996; TTU, 2000; WBG, 1998) and other sources (Walvoord, 2002) for the site characteristics.

B. Provide an assessment of the cumulative impacts from the proposed NEF construction and operations in relationship to existing and planned Quarry, Lea County Landfill, and WCS operations including the increase in total suspended particulate.

C. Describe potential releases from the proposed low-level radioactive waste disposal facility planned by WCS.

SECTION 6 - ENVIRONMENTAL MEASUREMENTS AND MONITORING PROGRAMS

Pursuant to 10 CFR Part 20, licensees are required to conduct surveys to demonstrate compliance and that radioactive material in effluent discharges are kept as low as reasonably achievable.

6-1 Water Resources:

A. Discuss the reason for the lack of any radiological or chemical sampling of the septic tank and leach field in Section 6.1.2.

B. If such monitoring is planned, provide information on the program.

C. Provide the locations of all groundwater sampling wells on Figure 6.1-2.

- Figure 6.1-2 legend indicates that groundwater samples would be taken at two locations to be determined at a later date. Groundwater would be sampled for radionuclides, metals, organics and pesticides. No rationale is provided for where the groundwater wells that would be necessary to take the samples would be located in orientation to the proposed NEF and to each other.

D. Clarify which of these wells would act as a background well and which aquifer is being sampled.

E. Clarify whether background monitoring well location would consider and avoid potential cross contamination from WCS and other surrounding industrial activities.

F. Describe the discharges that would occur from the outfall of the site stormwater detention basin (Item 7 on Figure 6.1-1).

G. Describe the water quality features of the discharges, the surface feature receiving the discharge from this outfall, and any impacts on the highway or surrounding facilities (e.g., Lea County Landfill).

H. Provide a discussion on any impacts of discharges from the outfall of the diversion ditch and associated mitigative measures (Item 5 on Figure 6.1-1).

I. Justify why the lower limits of detection (LLD) shown in Table 6.2-1 are higher than EPA action limits for some of the proposed analyses.

- Table 6.2-1 shows the LLD for metals to be 5 parts per million (ppm) whereas the EPA limit for lead is 0.5 ppm.

J. Describe how the surface water testing program complies with the State of New Mexico Standards for Interstate and Intrastate Surface Waters.

SECTION 7 - COST/BENEFIT ANALYSIS

Pursuant to 10 CFR 51.45(c), the ER is required to consider the economical, technical, and other benefits and costs of the proposed action and alternatives.

7-1 A. Provide a description of jobs to be generated during operation of the proposed NEF. Information should include:

1.) Number of jobs by job type (laborers, janitors, guards, engineers, mechanics, electricians, administrative staff, etc.), and

2.) Estimated hourly or monthly wages for each job type during the 30 years of operation.

3.) Anticipated educational or training requirements for job types.

B. Provide detailed information on the yearly itemized purchases for labor, equipment, and materials in Section 7.2.1. Information should include:

1.) Anticipated yearly purchases of steel, concrete, and related construction materials, and

2.) Anticipated percentage of construction materials to be purchased locally each year.

C. Discuss whether or not LES plans to apply for inclusion in a Foreign Trade Zone or apply for a sub-zone around the proposed NEF.