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**From:** "GENOA, Paul" <phg@nei.org>  
**To:** "dgeis@nrc.gov" <dgeis@nrc.gov>  
**Date:** 12/28/01 11:09AM  
**Subject:** NEI Comments on Draft Supplement 1

Attached are NEI's comments. They are also being sent by mail---phg

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Chief, Rules and Directives Branch  
December 28, 2001  
Page 2



NUCLEAR ENERGY INSTITUTE

**James W. Davis**  
DIRECTOR, OPERATIONS  
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December 28, 2001

Chief, Rules and Directives Branch  
Division of Administrative Services  
U. S. Nuclear Regulatory Commission  
Mail Stop T6-D59  
Washington, DC 20555-0001

**SUBJECT:** Industry Comments on Draft Supplement 1 to the Generic  
Environmental Impact Statement (GEIS) on Decommissioning of  
Nuclear facilities

The Nuclear Energy Institute (NEI) appreciates the opportunity to provide the following comments on behalf of the nuclear industry. The industry attended all four public meetings held by the NRC on the draft GEIS to offer comments in support of the document. While the industry identified technical corrections or additions to improve the accuracy of the document, they do not alter the conclusions reached in the evaluation.

Draft supplement 1 represents a useful update of the environmental impacts of decommissioning based upon over 200 facility-years' worth of actual decommissioning experience accumulated by nuclear facilities since the NRC published the initial GEIS in 1988. NEI concurs with the GEIS conclusions, which found that for the *"...environmental issues assessed, most of the impacts are generic and SMALL for all plants regardless of the activities and identified variables..."*

NEI commented in the scoping process that potential environmental impacts associated with the rubblization concept be analyzed in the GEIS Supplement. The non-radiological impacts are assessed, however *"...the staff has determined that Rubblization, or on-site disposal of slightly contaminated material, would require a site-specific analysis and the radiological aspects of the activity would be addressed at the time the license termination plan is*

Chief, Rules and Directives Branch  
December 28, 2001  
Page 3

*submitted."*

In order to ensure that the radiological aspects of this activity are assessed consistently, NEI recommends that standard dose modeling assumptions be documented directly through the Q&A process associated with the NRC guidance consolidation project.

Specific comments on the draft are provided in the attachment. They are provided to improve the accuracy of the data included in the draft, however they do not alter the conclusions documented in the supplement.

Once again, NEI appreciates the opportunity to provide these comments. If you have questions concerning the enclosed comments, please contact me at (202) 739-8105 or Paul Genoa at (202) 739-8034.

Sincerely,



James W. Davis

PHG/maa  
Enclosure

## **Draft NUREG-0586, Supplement 1 Specific Industry Comments**

### **Comments on the Executive Summary:**

Executive Summary, page xiv, line 20 - references 10 CFR 50.82(a)(6)(ii) which states that the licensee must not perform any decommissioning activity that causes any significant environmental impact not previously reviewed. The supplement at page 1-8 beginning on line 23 defines three levels of significance SMALL, MODERATE, and LARGE. At which of these significance levels does the requirement of 10 CFR 50.82(a)(6)(ii) come into affect? This needs to be defined as several Environmental Issues, e.g. threatened and endangered species are listed as site-specific.

### **Comments on GEIS Section 3:**

Section 3.1.3, p 3-8 – add “The systems described are typical and may differ at specific facilities.” to end of the 1<sup>st</sup> paragraph.

Section 3.1.3, p 3-10, 1<sup>st</sup> paragraph – add “or similar document” following “(ODCM)”, since limits may be in Technical Specifications rather than an ODCM. Also, the description of effluent systems should include mention of an evaporator, since some facilities use evaporation to convert liquid waste to gaseous and monitor their discharge.

Section 3.1.3, p 3-13, last paragraph – shipment of contaminated apparatus or hardware may also occur to support specific activities.

Section 3.1.3, p 3-14, 1<sup>st</sup> paragraph – shipment may also occur on barges or other ships.

Section 3.1.4, p 3-15, last paragraph – clarify whether the last sentence is referring to radiation exposure during decommissioning or operation. In context, the inference is that the activation products provide the main source of radiation exposure to plant personnel in an operating plant, but typically contaminated materials provide more exposure to plant personnel during operation.

Section 3.2, p 3-16 – the definition of SAFSTOR should more clearly define that it includes the final decontamination of the facility. This would be more consistent with definitions used elsewhere.

Section 3.2, p. 3-20 - defines two ENTOMB options developed specifically to envelope a wide range of potential options by describing two possible extreme cases of entombment. These extremes are useful in bounding an analysis, however they may be inappropriate for analysis to support a potential rulemaking for this option.

#### **Comments on GEIS Section 4:**

Section 4.3.4.2, p 4-14, 2<sup>nd</sup> paragraph – not all decommissioning sites have or will have building ventilation systems, especially those that are in SAFSTOR for many years. Temporary systems will be established, as needed, for gaseous effluents during decommissioning if installed systems are no longer functional.

Monitoring of air quality is not necessarily performed during the storage period, depending on activities, storage period and source term.

Section 4.3.4.4, p 4-16, 1<sup>st</sup> paragraph – add the following sentence to the end of the paragraph: “Particulates produced by decommissioning activities within buildings will be filtered as needed so that air quality impacts will be small.”

Section 4.3.4 pg. 4-14, last paragraph - This statement indicates that in most cases the number of shipments of other materials (non-radioactive materials) will be small compared to those for LLW. This is not necessarily the case for a plant that is removing all above grade facilities. However, this fact should not affect the conclusion that the air quality related environmental impacts for these activities will be small.

Section 4.3.5 pg. 4-19, 1<sup>st</sup> paragraph - This conclusion would result in site-specific analyses for the use of areas beyond the previously disturbed areas if there a potential to impact the aquatic environment exists. The vagueness of the condition “potential to impact” could be result in a site-specific analysis for any potential no matter how remotely possible. The NRC should consider rewording the condition to say “there is expected to be or likely to be an impact” Also on the previous page (pg. 4-18 last paragraph in section 4.3.5.2,) it appears that a site-specific assessment would be required merely if the aquatic environment has not been characterized. NRC should clarify that a site specific EIS is not necessary just because the lack aquatic environment characterization, but rather, if an area beyond the previously disturbed area is to be used and no associated characterization of the aquatic environment, if applicable, exists, then such a characterization should be conducted. Then as stated above, if there is expected to be or likely to be an impact to the aquatic environment, then a site-specific analysis should be conducted.

Section 4.3.6, pg. 4-23, last paragraph - This section should be reworded as in

section 4.3.5.4, as modified by the comment above.

Section 4.3.7, pg. 4-25, last paragraph - This conclusion indicates that the NRC will meet its responsibilities on a site specific basis during any decommissioning process, but it does not specify how the NRC will meet its responsibilities or what information it will need from licensees.

Section 4.3.13, pg. 4-57, last paragraph - This conclusion indicates that licensees will need to provide appropriate information related to environmental justice as part of the environmental portion of the PSDAR, but it does not specify what kind of information is needed or what evaluation criterion should apply.

Section 4.3.14, pg. 4-61, last paragraph - This conclusion indicates that the NRC will meet its responsibilities on a site specific basis during any decommissioning process, but it does not specify how the NRC will meet its responsibilities or what information it will need from licensees.

Section 4.3.17 pg. 4-68 - This section does not seem to give sufficient attention to licensees that are removing all above grade structures from the site and transporting all of the above grade concrete offsite. The volume of concrete for PWR DECON is much to low for this situation by a factor of three or four based recent experience.

**From:** Michael Masnik  
**To:** Doris Mendiola  
**Date:** 1/7/02 7:08AM  
**Subject:** Fwd: NEI Comments on Draft Supplement 1

Another comment letter on DGEIS. I think the notice appeared in the Federal Register on November 9, 2001.