

From: <jsaldarini@TtFWI.com>
To: <MXB6@nrc.gov>
Date: 8/18/03 8:17AM
Subject: FWENC (informal) comments on NUREG 1773

6/26/03
68 FR 38105
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Matt,

Confirming my voice message to you last week, attached are FWENC's informal comments on the ISF Facility draft EIS (NUREG-1773). I also understand that DOE will be providing you with a separate letter submitting their comments on the ISF DEIS.

Please let me know if you or the CNWRA reviewers have any questions regarding the attachment.

Thanks,

Jim Saldarini
Tetra Tech FW Inc.
(509) 372-5870 (office)
(509) 372-5801 (fax)
(973) 727-1544 (mobile)
jsaldarini@ttfwi.com

(See attached file: FWENC Comment Table_DEIS_081503.pdf)

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The staff Directives Branch (NRC)

Template = ADM-013

E-VIDS = ADM-03
Add = M. Blevins (MXB6)
J. Randall (JRH)

**NRC Draft Environmental Impact Statement (NUREG-1773)
FWENC (Informal) Comments**

Number	Page	Section/Figure	Comments and Recommended Changes
1	-	General - INTEC fence / ISF site location	<p>– The relation of our site to INTEC is not correct throughout the DEIS. For example,</p> <p><u>Correctly Stated:</u> Section 3.9.2, Page 3-61 lines 44-47. “The location of the proposed Idaho Spent Fuel Facility is just outside the INTEC complex on an open, previously disturbed 3.2-ha [8-acre] parcel of land immediately east of the INTEC perimeter fence, north of its coal-ash bury pit, and northeast of the coal-fired power plant.”</p> <p><u>Incorrectly Stated:</u> Section 2.3, Page 2-2, line 42. “The SNF transfer would occur completely within the boundaries of INTEC (Figure 2-1) and would be conducted in accordance with INEEL procedures and DOE orders.” Recommend removing words “would occur completely within the boundaries of INTEC”. Words really not needed – Figure 2-1 is adequate to show route and relationship.</p> <p><u>Unclear:</u> Page 4-4 – lines 11-12 “Most of the waste processing activities for the proposed Idaho Spent Fuel Facility would take place inside the perimeter fence at INTEC, an area dedicated to industrial use at INEEL for more than 40 years.”</p>
2	xv	Background 3 rd paragraph	The cessation of Shippingport operations is stated as 1984. Shippingport operations ceased 10/1/82, with the last fuel removed and final disassembly 5/16/84.
3	xvi	Proposed Action 5 th paragraph	The cessation of Shippingport operations is stated as 1983. See above comment.
4	xvi	Proposed Action	The statement is made “FWENC has proposed using an environmental checklist to verify whether the actual impacts are within the expected range.” This is a true statement, but a more accurate statement is that the “DOE-ID will verify transfer compliance with NEPA documentation using an environmental checklist prior to implementation.” (From FWENC Environmental RAI 1-1 Response) As written now, implies we will complete the checklist.
5	xviii	Transportation line 32	States the transportation distance as 700 m (2,300 feet). Distance should be 460 m (1,500 ft) as identified on Page 4-3, Section 4.2.1 line 8 of DEIS. (See Section 1.1 of SAR Appendix A). Recommend changing distance.

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6	xix	Water Resources line 5	Recommend adding "sanitary" in front of "wastewater treatment requirements" to make it clear that we only have sanitary waste.
7	xx	Socioeconomic line 27 and 29	Both lines refer to 4 years of operation rather than 3 years discussed elsewhere
8	xxi	Waste Mgmt lines 31-34	Indicates liquid waste will go to INEEL RWMC. This isn't the case (using mobile waste processing contractor who will transport waste to a licensed disposal site).
9	1-3	Figure 1-1	Laydown area not correct – Please refer to FWENC letter FW-NRC-ISF-03- 0149 dated June 4, 2003. In addition, the upper right representation of INEEL should label the point of interest as "INTEC/ISF" as the vertical arrow points to the ISF, not to the INTEC. The original SAR Figure 1.1-1 representation of INEEL has the point labeled "INTEC/ISF".
10	1-4	Section 1.2 lines 2-3	This section also identifies environmental checklist – recommend clarification like used for comment 4 above.
11	1-12	Section 1.6.1.2 lines 22-24	Indicates that we will submit a Permit to Construct Categorical Exemption to Idaho DEQ. This was based on the 2001 ISF ER. Recommend changing to the verbiage in ER Revision 2, Section 12.2.1, as follows "Documentation of the calculated emissions will be provided to the Idaho DEQ and EPA as appropriate to demonstrate compliance, and to address INEEL Title V operating permit considerations."
12	1-12	Section 1.6.1.2 lines 28-31	Identifies FWENC as RCRA conditionally exempt.... per 2001 revision of ISF ER. Recommend changing to Revision 2 of ER, Section 12.2.2 "Although the ISF Facility will generate only small quantities of RCRA waste, and would, on its own, meet small quantity generator requirements, the ISF Facility is considered part of the INEEL for RCRA waste accountability purposes. As a result, applicable sections of 40 CFR 270 for large quantity generators will be implemented in compliance with the existing INEEL RCRA permitting and coordination with DOE-ID and its M&O contractor."

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13	2-2	Section 2.3 lines 45-47	Recommend change as follows: "As described by FWENC, the proposed action can be divided into three FOUR major activities: (1) facility construction, (ii) fuel-handling operations, and (iii) storage operations, AND (iv) D&D ACTIVITIES."
14	2-4	Section 2.3.1.1 line 7	Recommend change as follows: "In addition to the site, about 4.1 ha (10 acres) EAST adjacent to the northeast corner of the site would be disturbed to provide a laydown area during construction."
15	2-10 through 2-14	Table 2-1 Summary of Environmental Impacts	In each case, the No-Action alternative indicates no impact. This is not correct, and not consistent with other sections, including Section 4.15 that outlines that eventually this material must be dealt with anyhow, and it will cost \$250 M more if not implemented now. Recommend modifying this chart to include life cycle impacts.
16	3-6	Section 3.1.3	The text states that site is above the 100 and 500 year flood levels. Please refer to SAR Section 2.4.4.2, which predicts overtopping of the Mackay Dam and flooding of INEEL.
17	3-10	Section 3.4.2	The second sentence is shown as part of a direct quote, but the words "uncontrolled fill or" have been deleted from the original soil characterization statement. The sentence should state that the soils "... consist of 1.5 m [5 ft] of uncontrolled fill or silt ..".
18	3-20	Figure 3-6	Based on DEIS Figure 3-7 and several ISF SAR Figures (2.1-8, 2.1-10, 2.4-4), Birch Creek is shown in the wrong location. It is further North and does not extend to any of the Playas.
19	3-22	Figure 3-7	Based on the title of this figure and the original SAR figure, the Probable Maximum Flood covers considerably more area than the spreading area south of the INEEL Diversion Dam. The legend appears to be incorrect.
20	3-40	Figure 3-10	The 4900 elevation arrow and 4910 elevation indicator shown in the Topographic Cross Section A – A' are incorrect. The higher elevation is the top line.
21	3-43	Section 3.7.1 4 th paragraph	The annual daily pressure should read annual <u>mean</u> daily pressure.

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22	3-19	Section 3.5.1.2 lines 46-47	The statement is made: "INTEC is surrounded by a storm water drainage ditch system." The implication taken in light of the DEIS is that this system also surrounds the ISF Facility site, which it does not. Recommendation – See comment 1 above
23	3-62	Section 3.9.2 lines 1-2	Recommend the following change: "An associated construction laydown area would be located on a previously disturbed 4.1 ha (10 acre) lot EAST a short distance northeast of the proposed Idaho Spent Fuel Facility site."
24	4-4	Section 4.4.1	The environmental report (Section 4.2) states that the site is 450 ft above the aquifer.
25	4-6	Section 4.4.2 2 nd paragraph	Our response to environmental RAI 2-1 states that the yearly INEEL water consumption is 7.4 billion liters rather than 6 billion as listed.
26	4-7	Section 4.6 lines 10-12	Indicates that FWENC will submit a Permit to Construct Categorical Exemption to Idaho DEQ. This was based on the 2001 ISF ER. Recommend changing to the verbiage in ER Revision 2, Section 12.2.1, as follows: "Documentation of the calculated emissions will be provided to the Idaho DEQ and EPA as appropriate to demonstrate compliance, and to address INEEL Title V operating permit considerations."
27	4-9	Section 4.6.2.1 lines 28 and 29	Based on the 2001 version of the Environmental Report, the statement is made: " This [emergency] generator is classified as an exempt source.... and would not require a permit". Although this statement is true that we do not need a separate permit, the emissions from this source are now included in all site emissions for reporting purposes. Recommend that this sentence be replaced with the modified wording in ER Revision 2, Section 12.2.1: "Documentation of the calculated emissions will be provided to the Idaho DEQ and EPA as appropriate to demonstrate compliance, and to address INEEL Title V operating permit considerations."
28	4-20	Table 4-4	The table in the EIS has been replaced in the Revision 2 ER Table 3-1. Recommend using the most current table.

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29	4-21	Section 4.12.1.2.2 lines 40 and 41	<p>This section says that construction activities would occur and involve only potential preexisting contaminants. Section 3.4.2 of this EIS indicates that preexisting contaminants are not an issue.</p> <p>Recommend at a minimum that Section 4.12.2.1.2.2 reference Section 3.4.2 for additional information on preexisting contaminants.</p>
30	4-23	Section 4.12.1.2.2	<p>The reference to 9.1 mSv [910 mrem] is not correct. It appears that ISF Facility SAR Table 7.4-2 was misinterpreted. Rev. 0 of SAR Table 7.4-2 provides total person-mrem for one year of ISF operations. The total person-mrem is 44,434. The table provides a total of 75 craft. Therefore the average dose per person is 592 mrem.</p> <p>Planned revisions to SAR Table 7.4-2 in response to Round 2 technical RAI 11-1 will change the above number to 47,035 person-mrem giving an average dose of 627 mrem. The Environmental report states that the ISF will employ about 60 people. If we divide the total estimated annual collective dose by 60 people we get 784 mrem per person, still below the 910 mrem quoted.</p> <p>The 47,035 person-mrem is conservative because we do not take credit for any shielding in the waste processing area. If we do account for shielding (as indicated in Table 7.4-2) the annual person-mrem is 17,794 and the average dose per person based on 60 workers is 297 mrem/yr. Again, this is well below the 910 mrem/yr value quoted.</p>
31	4-27	Table 4-8	The SAR is ISF-FW-RPT-0033 rather than 0032, and is FWENC 2001b
32	4-28	Table 4-9	<p>There are several responses in the "Effects and Consequences" column that start off "Staff requested for...". Also one that states "Staff review of independent..."</p> <p>Recommended updating the table to provide the effects and consequences requested.</p>
33	4-30	Table 4-9	The SAR is ISF-FW-RPT-0033 rather than 0032, and is FWENC 2001b

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34	4-31	Sec. 4.12.4.1 1 st paragraph	The sequence of events leading to the probable maximum flood includes a <u>48</u> hour storm and an antecedent storm with a magnitude of 40 % of the <u>48</u> hour storm based on Section 2.4.3.1 of the ISF SAR rather than a 4 hour storm.
35	4-31	Sec. 4.12.4.1 2 nd paragraph	The peak flow from the SAR is 82,100 ft ³ (Section 2.4.3.1) or 66,830 ft ³ at INTEC (Section 2.4.3.4) versus the 35,000 ft ³ stated.
36	4-38	Sec. 4.12.4.5 last paragraph	The SAR (Section 8.2.5.4) lists the estimated maximum wind speed that will occur with a probability of 1×10^{-7} per year as 171 mph rather than 117 as stated. Also the referenced basis was to NUREG/CR-4461 rather than Ramsdell and Andrews.
37	4-39	Section 4.12.4.5 last paragraph	The paragraph states that the transfer cask provides protection inside the canister receipt area. The canister receipt area is for new canisters and does not involve the transfer cask. Also the 15 % SNF handling number in SAR (Page 8.2-35, Case 3) is specific to the cask suspended by the crane in the cask receipt area unloading operation not the ISF facility.
38	4-40	Section 4.12.4.5 lines 2-3	Indicates that the CHM has been designed to withstand tornado missiles. Please refer to SAR 8.2-37 for a more correct discussion.
39	4-40	Section 4.12.4.6 line 21	Recommend adding to end of 1 st Paragraph: "Once construction is complete, unpaved areas of the property would be covered with gravel or similar material to further minimize combustible vegetation buildup." This is an excerpt from EIS section 4.4.1 page 4-5, lines 17-20
40	4-42	Section 4.13 1 st paragraph	The tank area rather than the tank provides the effective containment volume and the SAR (Section 6.3.2) uses 9700 gallons rather than 11,000.
41	4-42	Table 4-12	Correct the FWENC 2001 reference to 2001b
42	4-54	Section 4.14.3 line 37	Indicates a construction force of 250 for 4 years and an operational force up to 60 for the next several decades. Recommend changing the construction date to 2 years.

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43	4-56	Section 4.16 line 28	States that FWENC would be required to submit a detailed [D&D] plan to NRC for review and approval. Recommend that the term "Licensee" be used instead of "FWENC" since, at the time of decommissioning, the licensee may not be FWENC.
44	5-2	Table 5-1	This table includes two sections; namely Ecological Resources and Historic, Archeological, or Cultural Resources. In both cases, the potential mitigation does not acknowledge that the appropriate surveys have been performed. Recommend changing the table to identify that the appropriate surveys have been completed and are referenced in the ISF Environmental Report, which, in this DEIS section is called FWENC 2001a.
45	8-1	Section 8.1 lines 24-25	Indicates the distance for SNF transport is 700m (2,300 ft). Should be 460 m (1,500 ft) as identified on Page 4-3, Section 4.2.1 line 8.