

A. TOBLIN STAFF EXHIBIT 3

NIRS/PC EC-1



**NATIONAL
ENRICHMENT
FACILITY**

ENVIRONMENTAL REPORT



3.4.1.2 Facility Withdrawals and/or Discharges to Hydrologic Systems

The NEF plant will receive its water supply from one or more municipal water systems and thus no water will be drawn from either surface water or groundwater sources at the NEF site. Supply of nearby groundwater users will thus not be affected by operation of the NEF. NEF water supply requirements are discussed in ER Section 4.4, Water Resources Impact.

The NEF design precludes operational process discharges from the plant to surface or groundwater at the site other than into engineered basins. Discharge of routine plant liquid effluents will be to the Treated Effluent Evaporative Basin on the site. The Treated Effluent Evaporative Basin is utilized for the collection and containment of waste water discharge from the Liquid Effluent Collection and Treatment System. The ultimate disposal of waste water will be through evaporation of water and impoundment of the residual dry solids byproduct of evaporation. Total annual discharge to that basin will be approximately 2,535 m³ per year (669,844 gal/yr). The location of the basin is shown in Figure 4.12-2, Site Layout for NEF. Evaporation will provide the only means of liquid disposal from this basin. The Treated Effluent Evaporative Basin will include a double membrane liner and a leak detection system. A summary of liquid wastes volumes accumulated at the NEF is provided in Table 3.4-1, Summary of Potentially Contaminated Liquid Wastes for the NEF. Of the wastes listed in Table 3.4-1, only uncontaminated liquid wastes are released to the Treated Effluent Evaporative Basin for evaporation without treatment. Contaminated liquid waste is neutralized and treated for removal of uranium, as required. Effluents unsuitable for the evaporative disposal will be removed off-site by a licensed contractor in accordance with US EPA and State of New Mexico regulatory requirements. The State of New Mexico has adopted the US EPA hazardous waste regulations (40 CFR Parts 260 through 266, 268 and 270) (CFR, 2003cc; CFR, 2003p; CFR, 2003dd; CFR, 2003ee; CFR, 2003v; CFR, 2003ff; CFR, 2003gg; CFR, 2003hh; CFR, 2003ii) governing the generation, handling, storage, transportation, and disposal of hazardous materials. These regulations are found in 20.4.1 NMAC, "Hazardous Waste Management" (NMAC, 2000).

Stormwater from parts of the site will be collected in a retention or detention basin. The design for this system includes two basins as shown in Figure 4.12-2, Site Layout for NEF. The Site Stormwater Detention Basin at the south side of the site will collect runoff from various developed parts of the site including roads, parking areas and building roofs. It is unlined and will have an outlet structure to control discharges above the design level. The normal discharge will be through evaporation/infiltration into the ground. The basin is designed to contain runoff for a volume equal to that for the 24-hour, 100-year return frequency storm, a 15.2 cm (6.0 in) rainfall. The basin will have approximately 123,350 m³ (100 acre-ft) of storage capacity. Area served includes about 39 ha (96 acres) with the majority of that area being the developed portion of the 220 ha (543 acres) NEF site. In addition, the basin has 0.6 m (2 ft) of freeboard beyond the design capacity. It will also be designed to discharge post-construction peak flow runoff rates from the outfall that are equal to or less than the pre-construction runoff rates from the site area.

The Uranium Byproduct Cylinder (UBC) Storage Pad Stormwater Retention Basin is utilized for the collection and containment of water discharges from two sources: (1) cooling tower blowdown discharges and (2) stormwater runoff from the UBC Storage Pad. The ultimate disposal of basin water will be through evaporation of water and impoundment of the residual dry solids after evaporation. It is designed to contain runoff for a volume equal to twice that for the 24-hour, 100-year return frequency storm, a 15.2-cm (6.0-in) rainfall plus an allowance for

(3,311 ft) msl. Results of chemical and radiological analyses of water samples from that well are provided in Table 3.4-3, Chemical Analyses of NEF Site Groundwater.

Based on groundwater levels in MW-2 and data from the adjacent WCS site, a groundwater gradient of 0.011 m/m (0.011 ft/ft) was determined, generally sloping towards the south. Hydraulic conductivity of the saturated layer, based on slug tests is estimated to be approximately 3.7×10^{-6} cm/s (3.8 ft/yr). Based on the data collected at the NEF and WCS, the groundwater gradient in the siltstone unit at NEF is estimated to range from approximately 0.011 to 0.017 m/m (0.011 to 0.017 ft/ft).

3.4.15.1 Groundwater Elevation Trends

Three monitoring wells were recently installed at the NEF site, i.e., MW-1, MW-2 and MW-3 shown on Figure 3.4-6, Dockum Group (Chinle Formation) Surface Contour. They are being monitored for inflow of groundwater. The well screens are located at the first occurrence of groundwater beneath the site, some 65 to 68 m (214 to 222 ft) below land surface. They are set in a siltstone or silty sandstone that has very low permeability. Monitor wells tapping the same unit to the east of the site on the WCS property are also slow to recover after drilling and sampling operations. Some of the wells never appear to equilibrate between sampling events

Groundwater levels in the 70-m (230-ft) zone siltstone unit at the NEF is approximately at an elevation of 1,009 m (3,311 ft) msl which is consistent with data from the nearby WCS site. Levels do not fluctuate much over time.

3.4.15.2 Water Table Contours

Information relative to water table gradients in the siltstone at the base of the Chinle Formation unit is available from the WCS site to the east of the NEF. Based on the data collected at the NEF and WCS, the groundwater gradient in the siltstone unit at the NEF is estimated to range from approximately 0.011 to 0.017 m/m (0.011 to 0.017 ft/ft). The groundwater gradient was estimated based on interpretation of data collected at the NEF and WCS in the 70 m (230-ft) groundwater zone. The groundwater gradient generally slopes south beneath the NEF site. Water table contour maps will be produced for the NEF site as the data from the three monitoring wells becomes available to supplement the contour maps for the nearby WCS site.

3.4.15.3 Depth to Water Table for Unconfined Aquifer Systems

The depth to the first occurrence of groundwater beneath the site is on the order of 65 to 68 m (214 to 222 ft). This same geologic unit has been investigated beneath the WCS facility to the east of the NEF site. The information available from the WCS site suggests that this saturated unit, which is just below the red bed clay, may be under confined or semi-confined conditions. The unit is low in permeability, however, and does not produce water very quickly. It is not formally considered an aquifer, as discussed in ER Section 3.4.15.6, Interactions Among Different Aquifers.

3.4.15.4 Soil Hydrologic Properties

The top 0.3 to 17 m (1 to 55 ft) of soil is comprised of a silts, sands, and silty sands, grading to a sand and gravel base layer just above the red bed clay unit. Based on this characterization, the porosity of the surface soils is on the order of 25% to 50% (Freeze, 1979). The saturated hydraulic conductivity of the surface soils is likely to range from 10^{-5} to 10^{-1} cm/s (3.9×10^{-6} to

3.9×10^{-2} in/s) (Freeze, 1979). Estimates of the hydraulic conductivity of the Chinle clays are on the order of 10^{-8} cm/s (3.9×10^{-9} in/s) (Rainwater, 1996). Given the low permeability of the underlying red bed clay, this unit serves as a barrier for any hydraulic connection between the surficial hydrologic processes and any subsurface occurrence of groundwater beneath the Chinle clay.

3.4.15.5 Flow Travel Time: Groundwater Velocity

Groundwater flow velocities are dependent on the groundwater gradient and soil or bedrock permeabilities. WCS and NEF have wells in the saturated unit that constitutes the first occurrence of groundwater beneath the site. The groundwater velocity in this unit has been estimated to be very low, on the order of 0.002 m/yr (0.007 ft/yr). Based on the data collected at the NEF and WCS, the groundwater velocity at the NEF is estimated to range from approximately 0.002 to 0.09 m/yr (0.007 to 0.3 ft/yr).

3.4.15.6 Interactions Among Different Aquifers

As discussed in ER Section 3.4.1.1, there are occurrences of shallow groundwater in a thin saturated stratum just above the Chinle Formation red bed clays in various locations to the north and east of the NEF site. These localized zones of saturation are due to local infiltration mechanisms, such as fractures in the caprock caliche leading to underlying sand and gravel deposits, and infiltration through "buffalo wallow" depressions that pond surface water runoff. None of these shallow saturated unit occurrences are laterally continuous and none extend to the NEF site. Conditions at the NEF site are markedly different. It is probable that no recharge is actively occurring at the NEF site due to infiltration of precipitation. The native vegetation is quite efficient with evapotranspiration processes to intercept all infiltration before it gets to depth, a process that has probably been in progress for thousands of years. Therefore, no interaction exists between the shallow saturated units to the north and east of the site and the site itself.

The presence of the thick Chinle clay beneath the site essentially isolates the deep and shallow hydrologic systems. Groundwater occurring within the red bed clay occurs at three distinct and distant elevations. Approximately 65 to 68 m (214 to 222 ft) beneath the land surface, within the red bed unit, is a siltstone or silty sandstone unit with some saturation. It is a low permeability formation that does not yield groundwater very readily. It is not considered an aquifer. ER Figure 3.3-5, Site Boring Plan and Profile shows the locations of three monitoring wells (MW-1, MW-2 and MW-3) installed at the NEF site in September 2003 with screens at the depth of this horizon. Two of these wells have yielded no water. Well MW-2 produced a minimal amount of water suitable for sampling purposes several weeks after installation. Based on this information and the lack of groundwater encountered in other site borings, this unit is not interpreted to meet the definition of an aquifer (Freeze, 1979) which requires that the unit be able to transmit "significant quantities of water under ordinary hydraulic gradients."

The next water bearing unit below the saturated siltstone horizon is a saturated 30.5-meter (100-foot) thick sandstone horizon approximately 183 m (600 ft) below land surface, overlying the Santa Rosa formation. The Santa Rosa formation, is the third water bearing unit and is located about 340 m (1,115 ft) below land surface. Between the siltstone and sandstone saturated horizons and the Santa Rosa formation lie a number of layers of sandstones, siltstones, and shales. Hydraulic connection between the siltstone and sandstone saturated horizons and the Santa Rosa formation is non-existent.

3.6.1.3 Precipitation

The normal annual total rainfall as measured in Hobbs is 46.1 cm (18.2 in). Precipitation amounts range from an average of 1.2 cm (0.5 in) in March to 8 cm (3.1 in) in September. Record maximum and minimum monthly totals are 35.1 cm (13.8 in) and zero. Table 3.6-1B, Hobbs, New Mexico, Precipitation Data (1971-2000) lists the monthly averages and extremes of precipitation for the Hobbs data. These precipitation summaries are based on 30-year records.

The normal annual total rainfall in Midland-Odessa is 37.6 cm (14.8 in). Precipitation amounts range from an average of 1.1 cm (0.4 in) in March to 5.9 cm (2.3 in) in September. Record maximum and minimum monthly totals are 24.6 cm (9.7 in) and zero, respectively. The highest 24-hr precipitation total was 15.2 cm (6.0 in) in July 1968 (NOAA, 2002a). Table 3.6-6, Midland-Odessa, Texas Precipitation Data lists the monthly averages and extremes of precipitation for the Midland-Odessa data. These precipitation summaries are based on 30-year records.

The normal annual rainfall total in Roswell, New Mexico, is 33.9 cm (13.3 in). Record maximum and minimum monthly totals are 17.5 cm (6.9 in) and zero, respectively (NOAA, 2002a, 2002b). The highest 24-hr precipitation total was 12.5 cm (4.91 in) in July 1981 (NOAA, 2002b). Table 3.6-7, Roswell, New Mexico Precipitation Data, lists the monthly averages and extremes of precipitation for the Roswell data. These precipitation summaries are based on 30-year records.

Snowfall in Midland-Odessa, Texas, averages 13.0 cm (5.1 in) per year. Maximum monthly snowfall/ice pellets of 24.9 cm (9.8 in) fell in December 1998. The maximum amount of snowfall/ice pellets to fall in 24 hours was 24.9 cm (9.8 in) in December 1998 (NOAA, 2002a). Table 3.6-8, Midland-Odessa, Texas Snowfall Data, lists the monthly averages and maximums of snowfall/ice pellets. These snowfall summaries are based on 30-year records.

Snowfall in Roswell, New Mexico, averages 30.2 cm (11.9 in) per year. Maximum monthly snowfall/ice pellets of 53.3 cm (21.0 in) fell in December 1997. The maximum amount of snowfall/ice pellets to fall in 24 hours was 41.9 cm (16.5 in) in February 1988 (NOAA, 2002b). Table 3.6-9, Roswell, New Mexico Snowfall Data, lists the monthly averages and maximums of snowfall/ice pellets. These snowfall summaries are based on 30-year records.

There was no snowfall information for Hobbs, New Mexico, presumably because snowfall events are extremely rare.

3.6.1.4 Wind

Monthly mean wind speeds and prevailing wind directions at Midland-Odessa are presented in Table 3.6-10, Midland-Odessa, Texas Wind Data. The annual mean wind speed was 4.9 m/sec (11.0 mi/hr) and the prevailing wind direction was 180 degrees with respect to true north. The maximum five-second wind speed was 3.13 m/s (70 mi/hr).

Monthly mean wind speeds and prevailing wind directions at Roswell are presented in Table 3.6-11, Roswell, New Mexico Wind Data. The annual mean wind speed was 3.7 m/sec (8.2 mi/hr) and the prevailing wind direction was wind from 160 degrees with respect to true north. The maximum five-second wind speed 27.7 m/s (62.0 mi/hr).

Five years of data (1987-1991) from the Midland-Odessa NWS were used to generate joint frequency distributions of wind speed and direction. This data summary, for all Pasquill stability classes (A-F) combined, is provided in Table 3.6-12, Midland-Odessa Five Year (1987-1991) Annual Joint Frequency Distribution for All Stability Classes Combined.

Hand Wash and Shower Effluents are not treated. These effluents are discharged to the same Treated Effluent Evaporative Basin as for the Decontamination, Laboratory and Miscellaneous Effluents. Laundry Effluent is treated if necessary and discharged to this basin as well.

Cooling Tower Blowdown Effluent is discharged to a separate on-site basin, the UBC Storage Pad Retention Basin. The single-lined retention basin is used for the collection and monitoring of rainwater runoff from the UBC Storage Pad and to collect cooling tower blowdown. A third unlined basin is used for the collection and monitoring of general site stormwater runoff.

Six septic systems are planned for the NEF site. Each septic system will consist of a septic tank with one or more leachfields. Figure 3.12-1, Planned Septic Tank System Locations, shows the planned location of the six septic tank systems.

The six septic systems are capable of handling approximately 40,125 liters per day (10,600 gallons per day) based on a design number of employees of approximately 420. Based on the actual number of employees, 210, the overall system will receive approximately 20,063 liters per day (5,300 gallons per day). Total annual design discharge will be approximately 14.6 million liters per year (3.87 million gallons per year). Actual flows will be approximately 50 percent of the design values.

The septic tanks will meet manufacturer specifications. Utilizing the percolation rate of approximately 3 minutes per centimeter (8 minutes per inch) established by actual test on the site, and allowing for 76 to 114 liters (20 to 30 gallons) per person per day, each person will require 2.7 linear meters (9 linear feet) of trench utilizing a 91.4-centimeter (36-inch) wide trench filled with 61 centimeters (24 inches) of open graded crushed stone. As indicated above, although the site population during operation is expected to be 210 persons, the building facilities are designed by architectural code analysis to accommodate up to 420 persons. Therefore, a total of approximately 975 linear meters (3,200 linear feet) of percolation drain field will be required. The combined area of the leachfields will be approximately 892 square meters (9,600 square feet).

3.12.2 Solid Waste Management

Solid waste generated at the NEF will be grouped into industrial (nonhazardous), radioactive and mixed, and hazardous waste categories. In addition, solid radioactive and mixed waste will be further segregated according to the quantity of liquid that is not readily separable from the solid material. The solid waste management systems will be a set of facilities, administrative procedures, and practices that provide for the collection, temporary storage, (no solid waste processing is planned), and disposal of categorized solid waste in accordance with regulatory requirements. All solid radioactive wastes generated will be Class A low-level wastes (LLW) as defined in 10 CFR 61 (CFR, 2003r).

Industrial waste, including miscellaneous trash, vehicle air filters, empty cutting oil cans, miscellaneous scrap metal, and paper will be shipped offsite for minimization and then sent to a licensed waste landfill. The NEF is expected to produce approximately 172,500 kg (380,400 lbs) of this normal trash annually. Table 3.12-2, Estimated Annual Non-Radiological Wastes, describes normal waste streams and quantities.

Radioactive waste will be collected in labeled containers in each Restricted Area and transferred to the Radioactive Waste Storage Area for inspection. Suitable waste will be volume-reduced and all radioactive waste disposed of at a licensed low-level waste (LLW) disposal facility.