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October 21, 2005
AET 05-0075

Michael T. Lesar
Chief, Rules Review and Directives Branch
Attention: Document Control Desk
Mail Stop T6-D59
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

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RULES AND DIRECTIVES
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**American Centrifuge Plant
Docket Number 70-7004
Comments on the Draft Environmental Impact Statement for the Proposed American
Centrifuge Plant in Piketon, Ohio (TAC No. L32308)**

Dear Mr. Lesar:

The purpose of this letter is to provide USEC Inc. (USEC) comments on the U.S. Nuclear Regulatory Commission's Draft Environmental Impact Statement for the Proposed American Centrifuge Plant in Piketon, Ohio (NUREG-1834). Enclosure 1 of this letter provides USEC's comments.

If you have any questions regarding this matter, please contact Peter J. Miner at (301) 564-3470.

Sincerely,

S. A. Toelle

Steven A. Toelle
Director, Nuclear Regulatory Affairs

cc: M. Blevins, NRC HQ
J. Davis, NRC HQ
Y. Faraz, NRC HQ
B. Smith, NRC HQ
J. Strosnider, NRC HQ

Reference:

1. NUREG-1834, Environmental Impact Statement for the Proposed American Centrifuge Plant in Piketon, Ohio, Draft Report for Comment. Published August 2005.

SFSF Review Complete

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E-RDS=ADM-03

*all =
M. Blevins
(MXB6)*

Template=ADM-03

Enclosure 1 of AET 05-0075

USEC's Comments Regarding the Draft Environmental Impact Statement

Enclosure 1 of AET 05-0075
USEC's Comments Regarding the Draft Environmental Impact Statement

Comment Number	Page	Line	Comments
1	1-13	30	Change "municipal" to "public"
2	1-35	23 and 26	Change "United States Enrichment Corporation" to "USEC Inc."
3	2-10	13 and 23	Change "48X source cylinder" to "10-ton source cylinder." (See page 1-5 of the License Application, Revision 1).
4	2-14	47	Change "The X-7725B building..." to "The X-7725C building..." (See Environmental Report page 2-5.)
5	2-27	40-42	The Draft Environmental Impact Statement (DEIS) phrasing can be read to mean that the vent monitors have the capacity to monitor HF gas in real-time. This would not be accurate. The actual text should be clarified to state that the "gas flow monitoring instrumentation with local readouts" refers to total gas flow and accumulated radioactivity in the sample traps.
6	2-27/2-28	43-2	The description of the emission control systems on these lines is correct only for the X-3346, X-3356, and X-3366 buildings (the feed and withdrawal buildings). It explicitly cites the cold traps used to control UF ₆ from process gas piping and states that the alumina traps can not be bypassed. The process buildings emission controls do not directly connect to process gas piping, do not have cold traps, and the alumina traps can be bypassed by the Evacuation Vacuum system.
7	2-29	32-36	The DEIS gives the same value for the As Low As Reasonably Achievable (ALARA) goal for liquid radioactive effluent releases as for the ALARA goal for gaseous radioactive effluent releases (0.5 mrem/year). The liquid effluent ALARA goal USEC actually proposed in the License Application is ten percent of this value (0.05 mrem/year).
8		40-43	Paragraph should state, "Satellite accumulation areas would be established throughout the proposed ACP as necessary.... Waste is then moved to the XT-847 Waste Management Staging Facility to be sampled and measured...."
9	2-30	33	Change "OAC 37455-103" to "OAC 3745-51-03"
10	2-34	33	Change "19,040" to "19,030" and change "(21,000 tons)" to "(20,980 tons)" (See Environmental Report, page 4-130, Revision 5)
11		34	Change "42,800" to "41,105" and "571,200" to "512,730" (See Environmental Report, page 4-130, Revision 5)
12		35	Change "(630,000 tons)" to "(565,200 tons)"
13		39	Change "\$1,433 million" to "\$1,842 million" and delete the footnote. (Revision 5 of the Decommissioning Funding Plan assumes \$4.83/Kg U for disposal cost of tails.)
14	2-64	13, 16, 19, 22, and 25	Change "United States Enrichment Corporation" to "USEC Inc."
15	2-64	14, 17, and 20	Change "NRC Docket No. 70-2004" to "NRC Docket No. 70-7004"
16	2-88	27	Change to read as, "...activity would involve a filament winding process,

Comment Number	Page	Line	Comments
			which will not..."
17	3-24	19	Technetium-99 is misspelled.
18	3-25	40	The DEIS states that Little Beaver Creek receives "treated process wastewater...ditch)." Since November 1988, the only wastewater the east drainage ditch routinely receives is stormwater runoff, non-contact cooling water (essentially tap water), condensate from air conditioners and steam lines, and treated groundwater from the U.S. Department of Energy's (DOE) X-624 facility. None of these are "process wastewater." In addition, the only treatment any of these waters (except the groundwater) receive is a settling period in the X-230J-7 East Holding Pond. The DEIS phrasing implies that decontamination solutions, or a comparable material, are being discharged to the creek.
19		40	Delete word "process"
20		49	Change "612" to "012"
21	3-27	15	Change "19 permits" to "19 permitted outfalls,"
22		16	Change "19 permits" to "19 permitted outfalls,"
23		28	Change "permits" to "permitted outfalls."
24	3-28	5	Outfall Column - Change "1" to "001"
26		7	Outfall Column - Change "2" to "002"
27		9	Outfall Column - Change "0.125" to "003"
28		11	Outfall Column - Change "4" to "004"
29		13	Outfall Column - Change "5" to "005"
30		15	Outfall Column - Change "0.375" to "009"
31		17	Outfall Column - Change "0.4167" to "010"
32		19	Outfall Column - Change "11" to "011"
33		21	Outfall Column - Change "0" to "012"
34		22	Outfall Column - Change "0.042" to "013"
35		23	Outfall Column - Change "0.125" to "015"
36	3-30	7	Delete "manganese," from the Parameters column.
37	3-30	7	Add "Cadmium," to the Parameters column.
38	3-30	9	Delete "Fluoride, manganese," from the Parameters column.
39	3-30	9	Add "Cadmium, mercury," to the Parameters column.
40	3-31	8	Change "weekly composite" to "monthly grab"
41		11	Add "are taken quarterly." to the end of the sentence.
42		15	Add "are taken quarterly." to the end of the sentence.
43	3-40	34	Change "X-611a," to "X-611A,"
44	3-40	35	Change "X-611b" to "X-611B"
45	3-41	37	Notes: Q1 and Q4 are not used in Table 3-12, delete reference.
46	3-69	24	Change "healthy work effect," to "healthy worker effect,"
47	3-74	38	Section 3.14.3.1 lists 16,190 of containers, but the number should be 16,109 to be consistent with Table 3-31.
48	3-74	13	Change "XT847" to "XT-847"
49	3-80	33, 36, and 42	Change "United States Enrichment Corporation" to "USEC Inc."
50	3-80	34	Add "NRC Docket No. 70-7003" before the date.

Comment Number	Page	Line	Comments
51	4-14	7	Revise bulletized item as follows, "X-3356 and X-3366 Product and Tails Withdrawal Buildings;"
51		25	Add "X-3366," after "X-3356,"
52	4-21	17	Change "012" to "013"
53		18	Change "013" to "012"
54	4-23	33	Change "weekly composite" to "monthly grab"
55		37	Add "are taken quarterly." to the end of the sentence.
56	4-65	9-31	The radiation dose analyses on this page apparently used the same rural food source assumptions appropriate for the offsite locations. This pattern assumes that a fixed percentage of the receptor's food is produced at the home location. This is not a reasonable assumption for the on-site tenant organizations (ONG and OVEC). No foodstuffs are being produced on the DOE reservation and the percentages of the food sources for the on-site tenants should be adjusted to reflect this. CAP88-PC does allow this.
57	4-123	31	Add "NRC Docket No. 70-7004" before the date.
58	4-123	42	Change "USEC, Inc." to "USEC Inc."
59	4-123	46	Change "USEC, , Inc." to "USEC Inc."
60	5-4	31 and 34	Change "United States Enrichment Corporation" to "USEC Inc."
61	6-3	7	Revise bulletized item as follows, "X-3001, X-3002, X-3003, and X-3004 Process Buildings;"
62		8	Revise bulletized item as follows, "X-3356 and X-3366 Product and Tails Withdrawal Buildings;"
63	6-4	4	Revise subtitle as follows, " <u>X-3001, X-3002, X-3003, and X-3004 Process Buildings</u> "
64		6	Revise sentence to read as follows, "The X-3001, X-3002, X-3003, and X-3004 Process Buildings would..."
65		25	Revise subtitle as follows, " <u>X-3356 and X-3366 Product and Tails Withdrawal Buildings</u> "
66		26	Revise sentence to read as follows, "The X-3356 and X-3366 buildings would..."
67		6-6	6
68	7		Change "013" to "012"
69	6-12	34	Change "United States Enrichment Corporation" to "USEC Inc."
	7-10	43 and 46	Change "United States Enrichment Corporation" to "USEC Inc."
70	8-4	13	Change "3324" to "3346"
71	8-5	3	Change "United States Enrichment Corporation" to "USEC Inc."