

From: Gloria Kulesa
Sent: Friday, March 13, 2009 10:59 AM
To: Antoinette Walker-Smith; Tarsha Moon
Subject: Comments on the AREVA facility

-----Original Message-----

From: Jeff_Krupka@fws.gov [mailto:Jeff_Krupka@fws.gov]
Sent: Monday, March 02, 2009 1:10 PM
To: Gloria Kulesa
Subject: Re: Comments on the AREVA facility

Looks good Gloria. When you finalize this document, attach a cover letter requesting consultation and mail to:

Ken S. Berg, Manager
U.S. Fish and Wildlife Service
Washington Fish and Wildlife Office
Central Washington Field Office
215 Melody Lane, Suite 119
Wenatchee, WA 98801

As soon as we receive it, we'll get you a letter of concurrence within 30 days. Thanks, jk

Jeff Krupka, Supervisory Fish and Wildlife Biologist USFWS - Central Washington Field Office
215 Melody Lane, Suite 119
Wenatchee, WA 98801
509.665.3508 x18 (tel)
509.665.3509 (fax)

"I don't know the key to success, but the key to failure is trying to please everyone" - Bill Cosby

Gloria Kulesa
<Gloria.Kulesa@nrc.gov>

To "Jeff_Krupka@fws.gov"
02/26/2009 10:40 AM <Jeff_Krupka@fws.gov>
cc

Subject Comments on the AREVA facility

Good morning Jeff,

Based on your review of the Draft Environmental Assessment for the AREVA NP Fuel Fabrication Facility, you had several comments. Here are the actions taken.

Specific Comments:

1. In your comment on Section 3.11, Page 32, Table 8, you state, referring to Table 8, that the ". . . occupational dose limit for any exposure category is 50 mSv [5 rem], but the table suggests 12 of 15 categories failed to meet this criteria

over a 5 year period." NRC staff reviewed Table 8 and determined that the dose values expressed in units of milliSieverts, or "mSv," are incorrect. The values cited in terms of "rem" are correct, and the dose values expressed in terms of "mSv" should have been 10 times smaller than shown in Table 8. NRC staff will correct Table 8. As a result, the maximum TEDE for the period from 2003 to 2007 are all below the NRC occupational dose limit.

2. In your comment on Section 3.11, Page 33, Table 9, you state that "It appears the injury rate data suggests no acute health impacts. Does any data suggest potential for chronic effects from low-level exposure?" As NRC staff stated in section 3.11 of the EA, there are no data that indicates that plant operations adversely impact the health of its workforce relative to radiological, chemical, or physical agents (AREVA NP, 2008).

3. In your comment on Sections 4.4 (Air Quality) and 4.5 (Water Quality) (Pages 37-39) of the EA, you request additional information on the environmental impacts of permitted liquid waste discharges from AREVA to the Richland wastewater treatment facility, i.e. "estimated amount of contaminants released into the Richland sewer system ... what is the contribution of the AREVA facility". NRC staff provided further details in the discussion of the liquid waste discharge (which is reprinted below). In summary, AREVA NP is a small contributor (1.4% of the total) of wastes processed by the City of Richland's Publicly Owned Treatment Works facility. AREVA complies with the limits stated in their discharge permit issued by the City of Richland. Also note that it is the City (and formerly the State) that regulates these attributes. NRC does not have regulatory authority here.

Revision to Chapter 4.5 Water Quality:
AREVA NP used a lagoon in its past operations. It has since been decommissioned. With its removal, the AREVA NP property no longer contains any surface water or wetland bodies. Consequently, there are no direct, indirect, short or long term environmental impacts to surface water or wetland bodies on site as a result of continued operations at this facility.

Beyond the site, the primary surface water within the affected area is the Columbia River. The river is approximately 2.4 km [1.5 mi] down-gradient from the site. To remain in compliance with regulations and permits, AREVA NP possesses and uses processes, procedures, and controls to minimize groundwater contamination (refer to groundwater quality discussion in the next paragraph). Therefore NRC staff does not anticipate any significant groundwater contaminant flow from the site to the Columbia River. However, the site's wastewater ultimately reaches and

co-mingles with the river water. This results from the processing of wastewaters. AREVA NP processes their wastewater discharge (process wastewater, plant sanitary sewage, and cooling water streams) through the City of Richland's publicly owned sewage treatment facility (under permit number CR-IU004). Post treatment, the City discharges the flow into the receiving waters of the Columbia River.

CR-IU004 is a new permit, issued in 2006. Previously, the Washington State Department of Ecology held the waste discharge permit (ST3919), as authorized by the United States Environmental Protection Agency (the federal agency charged with regulating industrial users of publicly owned treatment works [POTW]). In 2006, the Department of Ecology granted regulatory authority to the City of Richland to pass local ordinances and issue their own discharge permits. City officials state that the recent permit limits are conservative "due to the limited historical data available to both the City and [AREVA NP] regarding the performance of the new pretreatment system... This is necessary in order to be protective of both the POTW and the receiving water body. It is the City's policy to include those parameters with limits either in the City's Pretreatment Code or within the City's own NPDES permit. The City does recognize that the data provided by [AREVA NP] indicates that several of the metals which have limits assigned, appear to be orders of magnitude lower than the applied local limits."

To show compliance with the various permits and regulations, AREVA NP samples sludge from the sewage treatment plant. Per NRC regulations, this is done to ensure that uranium and technetium levels in the sludge remains below the NRC monthly average sewer release limits (10 CFR Part 20, Appendix B). There are similar analyses performed for other attributes listed in CR-IU004, such as flow, conventional loadings, and metals. Based on a review of AREVA NP's discharges to the sewer data, AREVA NP's monthly discharges are within the regulated limits. Furthermore, the wastewater treatment plant treats mainly domestic sewage. Only 7.9% of the flow comes from industrial sources of which AREVA NP contributes 17%. Overall, AREVA NP's discharge is 1.4% of all the wastewater volume treated by the City of Richland. Based on this analysis, NRC staff considers that continued operation of the AREVA NP facility has no discernible impact on the daily operation of the POTW and therefore, AREVA NP has a small direct, indirect, and short term impact on Columbia River water quality.

Storm-water runoff may potentially affect groundwater quality. AREVA NP handles storm-water runoff through the use of a dry well system. Dry wells are passive devices in which runoff eventually intermingles with the groundwater and may include other surface

contaminants trapped in the runoff. The State regulates discharges to dry wells in its Underground Injection Control Program. From discussions with the State Department of Ecology, a new rule went into effect on February 2006 (i.e. provision of a schedule to complete registration and assessment of these wells). AREVA NP is addressing the change. In the meantime, the State allows the continued use of the wells. In order to maintain groundwater quality, AREVA NP continues with its programs and practices of managing spills and leaks. The programs include active containment (i.e. spill containment basins, double containment tanks) and employee reporting/inspection processes. Since changes in operations with respect to type and amount of effluent release are not anticipated under this license amendment, there will be no direct or indirect impacts to surface water as a result of continued operations at this facility. Therefore staff considers this a small effect.

Over the next forty years, the City of Richland anticipates increased industrial activity in the Horn Rapids Industrial Park. Further industrial activity could potentially increase the amount of industrial effluent and runoff received by the sewage treatment plant. Since the type of effluents can not be reasonably determined, the staff cannot assess the long-term or cumulative impacts.

The No-Action Alternative could impact water quality. In the short-term, decommissioning activities could increase levels of liquid effluent and the potential for spills. In the long-term, the impact would depend on the decontamination level achieved.

Also, you had 2 general comments that I summarized below with our response.

General Comments:

1. You noted that USFWS does not concur on NEPA documents. Rather USFWS provides comments in terms of Section 7. NRC's letter also refers to Section 7 and considers this action a consultation. NRC staff appreciate USFWS' comments and has revised the draft document accordingly. The email exchanges will be placed within our publicly available system as part of the AREVA NP 40 year license renewal package.

2. You asked if there is "some sort of risk assessment or EIS that has been conducted for the construction and operation of the receiving facilities [Hanford and Utah sites]?". The answer is yes. NRC staff are researching the references for these facilities and will note that within the final Environmental Assessment.

If you have any further questions, please contact me either by email or phone (301-415-5308).

USFWS' original email
Subject Comments on the AREVA facility

Hi, sorry for the delay. Lots of work, wading through some litigation, some annual leave, and a few time zones have made this more difficult than I had hoped for. Attached are my comments for your review, most are suggested changes and clarifications. If you accept them, we're done. If you want to discuss them first, that's fine too. Just trying to calibrate the paper, the land, and the resources in a way that makes sense and is consistent with our implementing regs. Thanks, jk

(See attached file: Comments on the AREVA EA.doc)

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