

Comments on the EA for the proposed license renewal of the AREVA NP Fuel Fabrication Facility

Prepared by Jeff Krupka, USFWS – Wenatchee, 16 October 08

General Comments

1. The Service doesn't "concur" on NEPA documents, we comment, at least in terms of Section 7(a)(2) analyses (i.e., consultation). I interpreted your letter to mean you are requesting consultation under Section 7 of the ESA by way of using the EA as your biological assessment. I know this may sound like gibberish, but both NEPA and ESA have very detailed procedures and outputs, I want to make sure I understand what you are asking. If NRC has some national agreement with the Service that governs this, please clarify what that is. I've not done a NRC project before and am assuming the standard policy and regs on Section 7(a)(2) apply. Please clarify.
2. Beyond the specific comments below, it seems to me the main outstanding issue (and it is an indirect, but potential significant effect) is long-term management of the waste stream. I read and re-read sections 2.3 and 2.4 but I have no idea how to address this; I realize nuclear waste is highly regulated, but there really isn't much discussion on the impacts of storage (e.g., Hanford and Utah sites). Then there are the non-nuclear wastes that I am more familiar with. In terms of section 7(a)(2), it's all about the impacts of the proposed action that are reasonably certain to occur. I'm also not sure what to propose as a remedy so I'll ask this question. Is there some sort of risk assessment or EIS that has been conducted for the construction and operation of the receiving facilities? If so, maybe we should summarize this, provide citations, and incorporate by reference and be done. Does this sound reasonable?
3. In the interests of timeliness, I'm only providing you a subset of my comments and that will have to do. The others are minor enough I'll pass so it doesn't take even longer to get this project wrapped up.

Specific Comments

1. Section 3.11, Page 32, Table 8: Am I reading this wrong? You state 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. Please clarify.
2. Section 3.11, Page 33, Table 9: It appears that the injury rate data suggests no acute health impacts. Does any data suggest potential for chronic effects from low-level exposure?
3. Sections 4.4 and 4.5 (Pages 37-39): In both these sections, you essentially describe that there is some air and water effluent of various types, but that they are within

permitted amounts. While that may be true, this does not inform the effects analysis (i.e., what is this effect to listed species or their habitats?). What would be helpful is to know (for example) the estimated amount of “contaminants” released into the Richland sewer system. If in this hypothetical example (and noting the effluent levels on Page 10), if approximately 400 pounds of BOD (I’m assuming due to Nitrogen) per month goes into the sewer plant, what comes out the end of the pipe? That is the effect of the action, and maybe AREVA contributes to 40% of the total Nitrogen released from the Richland sewer plant, and maybe this mixing zone downstream of the pipe has high algal growth, increased temperatures, or even fish kills. That is the information I need to get at to understand what the impact may be to say bull trout that migrate or hold in the receiving rivers. Also, I’m guessing an upper pH level of 10 is probably close to pure bleach or lye, which even in very low concentrations can be toxic to salmonids, especially bull trout which are quite sensitive. Again, what comes out the end of the pipe, what is the contribution of the AREVA facility, and what is the risk of exposure to listed species. In both cases, both acute and chronic effects should be assessed.

However, and this is a big however, if the City of Richland accepts AREVA’s waste, does this mean they are responsible for it at the end of the pipe, and this should not be an effect we assess in terms of this analysis? I have no idea what their permit looks like, what those effects may be, or even if a section 7(a)(2) nexus is appropriate or has already be conducted. If you can clarify this point, we’ll be 90% of the way there.

Please contact me if you have any questions regarding these comments. You can reach me at 509-665-3508 x18 or at jeff_krupka@fws.gov. Thanks, jk