



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
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ATLANTA, GEORGIA 30303-8960

May 27, 2009

Mary Adams
Senior Project Manager,
Fuel Manufacturing Branch
Division of Fuel Cycle Safety and Safeguards
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Rockville, Maryland 20852

**SUBJ: EPA Comments on the License Renewal
Global Nuclear Fuel--Americas, LLC, Wilmington, NC
Environmental Assessment and Finding of No Significant Impact**

Dear Ms. Adams:

Consistent with Section 102(2)(c) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) for the proposed License Renewal for Global Nuclear Fuel--Americas, LLC, in Wilmington, NC. We understand that the Nuclear Regulatory Commission (NRC) is considering the renewal of Special Nuclear Material License SNM-1097 for the continued operation of the Global Nuclear Fuel--Americas, LLC (GNF-A) Fuel Fabrication Facility located in Wilmington, North Carolina. This renewal authorizes the licensee to receive and possess nuclear materials at the Wilmington facility to fabricate and assemble nuclear fuel components under the provisions of 10 CFR Part 70, Domestic Licensing of Special Nuclear Material. If NRC approves the renewal of the license, the term would cover 40 years. We understand that based upon NRC's Environmental Assessment (EA), the NRC has concluded that a Finding of No Significant Impact (FONSI) is appropriate. If approved, NRC will issue the renewed license following the publication of this Notice.

The proposed action would allow the licensee to renew SNM-1097 for an additional 40 years at the Wilmington, North Carolina facility. Specifically, this would allow GNF-A to continue manufacturing and assembling nuclear fuel components for use in commercial light-water-cooled nuclear power reactors. GNF-A's request for the renewal was previously noticed in the Federal Register on June 18, 2007 (72 FR 33539), with an opportunity to request a hearing, and it is our understanding that no hearing requests were received.

EPA's review of the EA for the proposed license renewal revealed that the NRC staff considered direct, indirect, and cumulative environmental impacts to 12 resource areas in their evaluation, including: land use; transportation; socioeconomics; air quality; water quality; geology and soils; ecology; noise; historic and cultural; scenic and visual; public and occupational health; and waste management. All of the environmental impacts were described as small-to-moderate. The license renewal request does not include any altering of the site footprint nor does it change the operating processes of the existing facility. The proposed action was found to not adversely affect Federal or State-listed threatened or endangered species or flora and fauna in the site vicinity. Airborne effluents released through stacks and liquid effluents released in the North Cape Fear River are reported to be below and are anticipated to remain below regulatory limits in 10 CFR Part 20 for non-radiological and radiological contaminants. Public and occupational exposures are reported to be below the limit established in 10 CFR Part 20, and the NRC has found that GNF-A maintains acceptable waste management practices and procedures. The NRC staff thus concluded that the proposed 40 year renewal of license SNM-1097 will not result in a significant impact to the environment.

NRC staff consulted with other agencies regarding the proposed action, including the National Oceanic and Atmospheric Administration (NOAA) Fisheries, the North Carolina State Historic Preservation Office, the Waccamaw Siouan Tribe, the North Carolina Cape Fear Regional Council of Governments, the North Carolina Department of Environment and Natural Resources, the North Carolina Department of Agriculture, the North Carolina Department of Cultural Resources, the North Carolina Department of Transportation, the North Carolina Crime Control & Public Safety, Division of Emergency Management, Floodplain Management Program, New Hanover County Planning, and New Hanover County Environmental. The consultations ensured that the requirements of Section 7 of the Endangered Species Act and Section 106 of the National Historic Preservation Act were met and provided the designated State liaison agency the opportunity to comment on the proposed action.

The EPA Region 4 NEPA Program Office has no objections to the proposed action, but recommends that you coordinate this proposed action with Ms. Lynorae Benjamin, Chief of EPA Region 4's Regulatory Development Section, Air, Pesticides and Toxics Management Division, at (404) 562-9040 or at benjamin.lynorae@epa.gov. We appreciate the opportunity to review the EA and FONSI. Should you have questions, feel free to coordinate with Paul Gagliano, P.E., of my NEPA Program Office staff, at 404/562-9373 or gagliano.paul@epa.gov.

Sincerely,



Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management