

December 18, 2009

MEMORANDUM TO: Andrea Kock, Branch Chief
Environmental Review Branch
Environmental Protection
and Performance Assessment Directorate
Division of Waste Management
and Environmental Protection
Office of Federal and State Materials
and Environmental Management Programs

FROM: Stephen Lemont, Senior Project Manager **/RA/**
Environmental Review Branch
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SUBJECT: TRIP REPORT FOR AREVA EAGLE ROCK ENRICHMENT
FACILITY SITE VISIT AND AGENCY MEETINGS, JUNE 2-4,
2009

Enclosed please find the trip report for the AREVA Eagle Rock Enrichment Facility Site Visit and Agency Meetings conducted June 2-4, 2009.

The enclosed document does not contain any proprietary or classified information.

Docket No.: 70-7015

Enclosure: Trip Report

CONTACT: Kellee Jamerson, FSME/DWMEP
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Trip Report for AREVA Eagle Rock Enrichment Facility Site Visit and Agency Meetings June 2-4, 2009

On June 2-4, 2009, a site visit was conducted for the proposed AREVA Enrichment Services, LLC (AREVA) Eagle Rock Enrichment Facility (EREF); in support of the U.S. Nuclear Regulatory Commission's (NRC) environmental review for NRC's licensing action for the EREF. This trip report summarizes the discussion topics and findings from agency meetings and meetings with AREVA during each day of the site visit.

Date: Tuesday, June 2, 2009

Agency: Bonneville County Public Works

Attendee: Kevin Eckersell (Public Works Director)

NRC and Bonneville County staff discussed the landfill capacity with regard to whether the capacity was adequate to accommodate solid waste from the proposed facility. The County has separate landfills for construction and municipal wastes. They do not expect to have a problem with having capacity for either waste. The municipal waste site is currently filling cell 2 of 7. NRC staff determined that additional information was needed to obtain official landfill capacities, current fill rates, and the estimated waste volume. In addition, we will need waste volumes from AREVA to ensure the slated capacity is sufficient.

Agency: Bureau of Land Management, Upper Snake Field Office

Attendees: Wendy Reynolds (Field Manager), Karen Rice (Associate District Manager for the Idaho Falls District), Rebecca Lazdauskas, Mark Kennison (District NEPA Coordinator)

The NRC and Bureau of Land Management (BLM) staff discussed the status of BLM land in and around the proposed site and impacts analyses on the land being completed by each agency. BLM is in the process of redoing the Resource Management Plan for the Upper Snake Field Office. BLM's Environmental Impact Statement (EIS) is due in 2011-2012 timeframe. Also, AREVA mentioned that they might be interested in purchasing the 750 acres to the west of the EREF site between it and the Idaho National Laboratory (INL), primarily for security purposes. Neither the 40 acres within the EREF property nor the additional 750 acres is currently listed as available for sale. In addition, BLM indicated there was no recreation in the 750 acres of BLM land adjacent to the EREF site. Based on this information, NRC staff determined that additional information would be needed from AREVA regarding the proposed uses of the 750-acre parcel of land. Finally, BLM indicated that Hell's Half Acre was a wilderness study area and BLM had no major concerns or conservation activities at the proposed site. Both NRC and BLM staff agreed that sharing information at each agency's draft EIS stage would be beneficial to each agency.

Enclosure

Agency: Bonneville County Planning and Zoning Department

Attendee: Steve Serr -Responsible for building permits, overseeing compliance with the fire code and mechanical codes checking construction not within flood plains.

During this meeting, NRC staff and the County representative discussed the status of permits for the site. The County Planning Office is responsible for tracking the status of various permits required before a building permit can be issued. AREVA had not submitted a building permit application at the time of the meeting. NRC was advised that the nearest residence is 4-5 miles away. The agency has had preliminary discussions on some of the buildings and will require paved roads into and out of the facility. All facility construction will follow Occupational Safety and Health Administration guidelines. The agency expects to have two full-time inspectors on-site when construction begins. Finally, the agency informed us that there was no significant hunting near this site, and the County representative was not aware of plans for other facilities near the proposed site. In addition, there will be no agricultural activities on the site after construction begins. The agency indicated that they would send a zoning map to NRC.

Agency: Idaho Fish & Game

Attendee: Gary Vecellio -Environmental Review and Coordination

At the meeting with NRC staff, Mr. Vecellio stated that we should officially send a letter to the director of Idaho Fish and Game and to Paul Kjellander in Idaho's Office of Energy Resources before any assistance can be extended. He further reiterated that all requests for review or assistance should specifically include a reference to the Element Occurrence database for the nearest known locations of the species of concern identified. He also informed the NRC that management's plans for the sage grouse, mule deer, and grey wolf are available on the internet. He further indicated that once a letter from NRC is received, Idaho Fish and Game would request that certain species be considered in our review, including the mule deer, prong horn, elk, sage grouse, and the sharp-tailed grouse.

Date: Wednesday, June 3, 2009

Agency: Idaho Transportation Department

Attendees: Dave Walrath, Ken Hahn, Matt Davison, Bill Shaw, Tim Cramer

The agency informed the NRC that AREVA would need an annual permit for an access point to U.S. 20, which is primarily a commuter route with heavy traffic during the morning and evening commutes to and from INL. The agency expressed concerns with flow into U.S. 20 and recommended acceleration and deceleration lanes (turn lanes) and staggered shift release times. The agency informed the NRC that there is a local perception that U.S. 20 is unsafe and that the AREVA project will make the problem worse. The intersection of U.S. 20 and I-15 may need to be upgraded as time goes on to handle traffic (geometry not favorable for trucks and right-of-way is limited). Presently, U.S. 20 is overbuilt to a distance of 5 miles west of Idaho Falls for the current traffic levels. A study conducted in 2005 indicated that further expansion to four lanes is not necessary (although selective passing lanes would be advantageous). The traffic on

U.S. 20 could increase if the INL park and ride bus system is cancelled. The agency advised about potential periodic problems regarding wildlife and weather in the area and anticipating a 24/7 operation of the facility due to chronic weather-related shutdown of U.S. 20 in winter could be a challenge. If needed, the agency can provide road closure data.

Date: Thursday, June 4, 2009

Agency: Shoshone Bannock

Attendees: Tribal Council

At the meeting, NRC staff discussed the process for licensing an enrichment plant. NRC staff also answered questions from the tribe on the source of the uranium, waste storage at the facility, the proposed shipping corridor, etc. Other questions included:

1. Where is the uranium coming from?
2. How long will the waste be stored at the facility?
3. What is the shipping corridor that will be used to bring the material to the plant?
4. What type of training is provided to deal with a transportation accident involving radioactive material?
5. Are there any issues associated with water use?
6. Where is the water coming from?
7. What happens to the waste water?
8. Will local emergency responders be trained to deal with accidents that may occur at the plant ?
9. What are the impacts on flora and fauna?
10. Will there be any impacts to water and air in relation to habitats?
11. What is AREVA's track record when dealing with the environment?
12. Will the NRC consider whether AREVA has demonstrated a positive track record when considering the environment when operating their other facilities?

Agency: Idaho Department of Environmental Quality

Attendees: Lezlie Aller, David Jones, Bruce LaRue, Mark Dietrich (Administrator in the Department of Environmental Quality's Technical Services Division and the State Response Program Manager) was unable to attend (flat tire)

The agency informed NRC that the AREVA emergency plan seems adequate. They also stated there are five Idaho Department of Environmental Quality (DEQ) region teams that cover the Waste Isolation Pilot Plant (WIPP) route in Idaho. DEQ trains state emergency responders for transportation accidents and receive advance courtesy notice from U.S. Department of Energy for radioactive shipments.

Agency: Idaho Department of Water Resources

Attendees: Ernest Carlsen

The agency informed the NRC that AREVA had purchased an irrigation water right and changed it to industrial use. The water right transfers are ready for approval, but AREVA has requested a hold on the approval because the use must be developed within 5 years of the approval and the current landowner would not be able to use the water for irrigation once the change was made to an industrial use permit. The requested water use is not expected to cause a problem with the aquifer and a model used by the Idaho Department of Water Resources (IDWR) was run to check impacts. IDWR will require a monitoring device (water rate and volume) to be installed.

Agency: Discussions with AREVA June 3rd PM and 4th, Wed. AM,)

The following topics were discussed and AREVA plans on addressing many of these discussions in a supplement to its Environmental Report (ER). AREVA anticipated sending the supplement to NRC in July 2009. Additionally, NRC staff conducted a tour of the EREF site on the afternoon of June 3, 2009.

Accidents

NRC staff discussed the material at risk for the seismic and fire accident scenarios. These were provided in Appendix E of the ER, but the actual release amounts and how they were derived were not provided. AREVA agreed to review what potential operations impacts to construction workers could occur during the combined construction and operations phase.

Air Quality and Meteorology

AREVA will re-analyze their air quality impact discussion that covers the period of time in which the construction and operation phases overlap. AREVA will consider the extent of the construction impacts during the 4 year overlap. AREVA also confirmed that initial site preparation work for the entire site will be completed during initial construction, including those areas that will not undergo construction until years later.

Cumulative Effects

AREVA will provide additional information regarding public or private development activities planned within 10 miles of the site. In addition, AREVA committed to providing NRC with the Rocky Mountain Power conceptual study report (December 2008) that describes access to the electric grid and options for transmission lines.

Ecology

AREVA will provide additional information regarding ecology. Currently, AREVA does not have a mitigation plan to address migratory birds. However, AREVA verbally stated their intent to avoid movement of nests during construction, if discovered during the nesting season. AREVA stated their intention is minimize the impact to the area.

AREVA plans to work within the facility footprint including keeping the lay-down activities within this zone.

Geology

AREVA will provide NRC with additional information on the radionuclides detected in the soil profiles.

Historic and Cultural Resources

AREVA will provide additional information regarding the Wasden site and the Idaho State Historic Preservation Office visit on Sept 4, 2008. AREVA will also include maps regarding cultural resources.

Human Health-Non-Radiological

NRC staff asked AREVA to describe the safety measures that AREVA would have in place to limit worker exposure to hydrogen fluoride during such activities as maintenance. AREVA described their safety measures and their process (sub-atmospheric pressure). AREVA does not anticipate worker exposure to this chemical.

Human Health-Radiological

AREVA will provide additional information to support their analysis of collective worker population doses.

Hydrology

AREVA agreed to provide additional information regarding their methodology for water use during construction, including use for farming.

Noise

AREVA discussed with NRC staff some key issues such as the number of shifts that will be used during construction and the type of pile-driving or blasting activities that can be expected. AREVA will provide additional details on explosives usage or pile driving and on controls that will be established to attenuate sound. AREVA will also provide noise signature data for the identical centrifuges located at the National Enrichment Facility in New Mexico.

Transportation

NRC requested the radionuclide inventory for all shipments. This information is needed to analyze transportation accidents. NRC also requested information on radiological and hazardous waste shipments that are currently transported on U.S. 20 to and from INL. Also, NRC requested quantitative estimates of site access traffic during construction years 4 through 11 and during the decommissioning phase.

AREVA planned to submit a supplement at the beginning of July 2009 to address the information needed by the NRC as outlined above. This information will be placed in the NRC's Agencywide Documents and Management System