GEHitachiUELAPEm Resource

From: Ridge, Christianne
Sent: Tuesday, November 10, 2009 7:04 AM
To: GEHitachiHrgFile Resource
Subject: FW: GLE Environmental RAIs
Attachments: ML0926601172.doc; ML0926605055.doc

From: Ridge, Christianne
Sent: Tuesday, October 13, 2009 10:49 AM
To: 'Olivier, Julie A (GE Infra, Energy)'
Cc: Kock, Andrea; Johnson, Timothy
Subject: GLE Environmental RAIs

Julie,

Per our discussion during the 9/22 teleconference, I have attached the non-security related environmental request for additional information NRC sent you by mail.

Christianne Ridge
Environmental Project Manager
Division of Waste Management and Environmental Protection
US Nuclear Regulatory Commission
301-415-5673

Hearing Identifier: GEHitachiUE_LicenseApplication_Public
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October 7, 2009

Mr. Albert Kennedy, Licensing Manager
GE Hitachi Global Laser Enrichment
P.O. Box 780
3901 Castle Hayne Road
Wilmington, NC 28402

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION RELATED TO THE PREPARATION OF AN ENVIRONMENTAL IMPACT STATEMENT FOR THE GENERAL ELECTRIC-HITACHI PROPOSED GLOBAL LASER ENRICHMENT FACILITY

Dear Mr. Kennedy:

On June 26, 2009, General Electric-Hitachi (GEH) submitted an application to the U.S. Nuclear Regulatory Commission (NRC) for a license to authorize construction and operation of a uranium enrichment facility. As established in Title 10 Code of Federal Regulations Part 51 (10 CFR 51), the NRC regulation that implements the National Environmental Policy Act of 1969, as amended, the NRC is preparing an Environmental Impact Statement for the proposed action.

During the review of the application and environmental report, questions have arisen requiring the NRC staff to request additional information and clarification. Please provide a response to the enclosed request no later than 30 days from the date of this letter. Any information which GEH proposes to withhold from public disclosure as proprietary should be identified and submitted pursuant to the requirements of 10 CFR 2.390.

If you have any questions, please contact Ms. Christianne Ridge of my staff at (301) 415-5673.

Sincerely,

/RA/

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

Docket No.: 70-7016

Enclosure: Request for Additional Information

cc: see next page

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DATE	9/25/09	9/25/09	9/25/09	10/06/09	10/07/09

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cc: William Szymanski/DOE
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Robert Brown/GEH
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Mike Giles/CFC
Tom Clements/FOTE
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Wanda Lagoe/NCOSH
Cameron Weaver/NCDENR
Emily Hughes/USACE
Lafayette Atkinson/NCOSH
David Weaver/New Hanover County

Request for Additional Information

GE-Hitachi Global Laser Enrichment Commercial Facility

The general requirements for an U.S. Nuclear Regulatory Commission (NRC) Draft Environmental Impact Statement (DEIS) are delineated in 10 CFR 51.70. Pursuant to 10 CFR 51.70(b), the NRC staff is required to prepare a DEIS that: (1) is concise, clear, analytical, and written in plain language, and (2) states how the alternatives considered in the DEIS and decisions based on it will achieve the requirements of Sections 101 and 102(1) of the National Environmental Policy Act. Appendix A of 10 CFR Part 51 describes the format the NRC staff will use in preparing the DEIS.

To prepare a DEIS consistent with the requirements of 10 CFR 51.70, certain information is required. To satisfy the information requirement, the applicant is required, in accordance with 10 CFR 51.45, to provide an Environmental Report (ER). The NRC staff is required to independently review the information in the ER and prepare a DEIS. The staff has reviewed the applicant's license application, including the ER, and determined that additional information is necessary to prepare a DEIS that satisfies the requirements of 10 CFR 51.70.

The section numbers given below refer to the sections in the ER. (GLE, 2008)

SECTION 1 – INTRODUCTION

Pursuant to 10 CFR 51.45(d), the ER is required to list all the Federal permits, licenses, approvals, or other entitlements which must be obtained in connection with the proposed action.

1-4 Applicable Regulatory Requirements, Permits, and Required Consultations:

A. Provide, as available, an update on the status of required permits, licenses, and approvals for the construction and operation of the proposed GE-Hitachi Global Laser Enrichment (GLE) facility since the ER was submitted to NRC.

SECTION 2 – ALTERNATIVES

Pursuant to 10 CFR 51.45(b), the ER is required to include a discussion of alternatives to the proposed action.

2-1 No-Action Alternative

A. Provide the additional information specified below regarding the intended use of the site if NRC does not grant a license to construct and operate the proposed GLE facility.

    1. Indicate which site preparation activities are expected to be completed before NRC determines whether to grant a license to construct and operate the proposed facility.

2. Indicate whether all of the land cleared prior to the licensing decision would be expected to remain cleared if NRC does not grant a license to construct and operate the proposed facility.

Basis: The ER indicates that certain facilities that may be constructed prior to NRC's licensing decision would be used for other purposes if NRC does not grant a license to construct and operate the proposed facility. However, other aspects of the no-action alternative related to site preparation activities are not specified. This information is required to provide an accurate description of the no-action alternative.

SECTION 3 – DESCRIPTION OF AFFECTED ENVIRONMENT

Pursuant to 10 CFR 51.45(b), the ER is required to contain a description of the affected environment.

3-1 Ambient Air Radiation Level:

A. Provide a summary table or chart that compares recent ambient air radiation level measurements taken at on-site and off-site locations on the General Electric Wilmington Site. Specifically, provide on-site ambient air radiation data for 2005 to 2008 and off-site ambient air radiation data for 1999 to 2008.

   Basis: Tables 3.11-2 through 3.11-5 in the ER provide measurements at four on-site locations from 1995 to 2005 and compare them with measurements at two off-site locations from 1995 to 1999. More recent on-site measurements will be compared with the latest off-site measurements to evaluate occupational health impacts.

3-3 Geology and Soils:

A. Provide any available data for soil chemical and radiological characteristics at the proposed facility in the north-central sector of the Wilmington site. If there are plans to take soil samples at the proposed site to establish the baseline soil conditions, provide a description of the plans.

3-4 Water Resources:

A. Provide a reference regarding any remedial excavation at the Fuel Components Operation, including the date, purpose, and approximate volume of excavated soil. This information is needed to provide an accurate description of the affected environment.

B. Provide the information specified below regarding the procedures for managing effluents when high pH is detected through continuous monitoring at the site dam.

   1. Indicate the site processes responsible for potentially elevated pH effluent and the pH level that causes the alarm.

2. Indicate when the site dam has been closed because of elevated effluent pH and any applicable reporting requirements.

3. Describe what is done to mitigate high pH in the effluent channel prior to re-opening the dam's gate, and how quickly this mitigation can be accomplished.

Basis: During the site visit, the applicant indicated that continuous monitoring equipment at the site dam alerts GEH staff to elevated effluent pH. GEH staff indicated that a gate at the dam can be closed to stop discharge from the effluent channel. Additional information is needed to assess the potential impacts of elevated pH effluents.

SECTION 4 – ENVIRONMENTAL IMPACTS

Pursuant to 10 CFR 51.45(c), the ER is required to include an analysis that considers and balances the environmental effects of the proposed action, the environmental impacts of alternatives of the proposed action, and alternatives available for reducing or avoiding adverse environmental effects.

4-1 Public Health Impacts from Liquid Effluent Releases:

A. Provide the information specified below to support an analysis the dose contributions of liquid effluents from the proposed Global Laser Enrichment (GLE) facility.

   1. Provide estimated doses to the maximally exposed member of the public and the collective dose to the population in the region of influence from liquid effluent releases attributable to the proposed GLE facility.

   2. Provide the estimated radionuclide concentration in the liquid effluent releases from the proposed GLE facility, dilution factors at the receiving water bodies where humans may be exposed, and applicable exposure pathways.

   Basis: The ER does not include public impacts from liquid effluent releases. Section 4.12.2.2.2 indicates that "any impacts on human health to nearby resident or on-site workers from these effluents or from receiving waters are anticipated to be SMALL" without providing supporting information. The total annual dose to the public from all exposure pathways will be compared to the dose limits in 10 CFR 20.1301 and 40 CFR 190.

4-2 Transportation Impacts:

A. Clarify whether pre-construction has an impact on the 815 additional daily trips during the construction phase. Specifically, indicate whether the 815 additional daily trips are still anticipated during the construction phase.

   Basis: The amount of additional traffic anticipated during construction of the GLE facility was given as 815 additional daily trips (ER Section 4.2.2.1). The amount of additional traffic anticipated during site preparation (pre-construction) activities was subsequently given as 200 additional daily trips in ER Supplement 1(GLE,2009b), but there is no indication as to

whether some of this work will overlap with the construction phase. Clarification is needed regarding the amount of additional traffic anticipated during construction of the GLE facility, to properly assess transportation impacts.

4-4 Water Resource Impacts:

A. Provide the information specified below regarding the GLE liquid effluent treatment system.

   1. Provide the acceptable levels of uranium after pre-treatment.

   2. Describe the treatment equipment and process. Provide justification for the conclusion that the treatment steps would produce an effluent with concentrations similar to those of current process wastewaters.

   Basis: ER Section 4.4.2.3.1.2 states that liquid radwaste from the GLE facility would be pre-treated in a liquid effluent treatment system to reduce uranium to acceptable levels before transfer to the existing Wilmington Site final process lagoon wastewater treatment facility but does not indicate the acceptable levels or describe the treatment system.

B. Provide information on the design and construction of the stormwater wet detention basin, including size, materials of construction (e.g., composition of liners), discharge structure, and storm design.

C. Provide information on the design and construction of the UF_6 storage pad stormwater holding pond, including its size, discharge structure, storm design, and details of the liner.

D. Provide a monitoring plan for the UF_6 storage pad stormwater holding pond, including any planned treatment steps for the water in the pond. Indicate sample quantities and frequencies under normal conditions and for rainfall events.

E. Provide copies of notices of violation of the National Pollutant Discharge Elimination System (NPDES) permits issued during the last ten years.

4-5 Ecological Resource Impacts:

A. Provide a figure that shows the location of various components and ancillary facilities associated with the GLE facility and the footprint of land that would be disturbed to install the facilities. This figure should include components such as the stormwater wet detention basin, guard stations, lift stations, and the transmission line that would be located outside of the 100-acre area that would be cleared.

B. Section 4.3.1 of ER Supplement 1 states that 175 acres of land would be cleared and graded. Describe what the 75 acres that are not part of the 100-acre GLE site include. In addition, provide an updated version of ER Table 4.5-1 to reflect the 75 acres (rather than the 45.8 acres now listed for the proposed utility structures and original location of the proposed north access road). As feasible, summarize the components and habitats that would be affected by the recent addition of 34 acres to the GLE study area.

Basis: Section 4.3.1 of ER Supplement 1 states that 175 acres of land would be cleared and graded but does not provide enough detail to determine which types of habitats will be affected. A portion of the 175 acres is expected to be the additional 34 acres mentioned in Section 1.3 of the ER Supplement 1. However, a more precise breakdown of the locations of the areas to be cleared and corresponding habitats is needed.

C. Provide a figure that shows the land that would be disturbed to install potable water, process water, water for fire suppression, sanitary sewer, and natural gas utilities; and specify the method(s) by which they would be installed.

D. Provide the additional information specified below regarding special status species on the Wilmington site.

    1. Describe any ecological resource surveys that will be conducted prior to the start of site preparation (pre-construction) activities, especially for special status species, including, but not limited to, the rough-leaved loosestrife and red-cockaded woodpecker.

    2. Describe the procedures used during the July and September 2007 field surveys.

Basis: Section 7 of the Endangered Species Act of 1973 (16 USC 1531 *et seq*.) requires the NRC staff to ensure that its actions are not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of the habitat of such species. As part of its process to meet its responsibilities under the Endangered Species Act, NRC staff requested information from the U.S. Fish and Wildlife Service (FWS). The FWS indicated the NRC DEIS should specify whether rough-leaved loosestrife habitat currently exists on the site and indicated that, if suitable habitat exists, surveys for rough-leaved loosestrife habitats should be performed (FWS, 2009). In addition, the FWS indicated the NRC EIS should provide additional information to support the finding that no red-cockaded woodpecker cavity trees exist on the site. The letter also provided information about appropriate steps to determine the potential impact on the species (FWS, 2009).

E. Provide the most recent dates and areas where logging has occurred in the area proposed for the GLE facility. Also, provide whatever similar summary data is available for logging on the Wilmington site since 1980 (approximately). This information is needed to support conclusions about the suitability of the site for red-cockaded woodpecker habitat.

F. Provide a figure similar to ER Figure 1-2 that shows the “30-acre” area outlines for the proposed ATC II complex and the Tooling and Development Center. This information is needed for the cumulative impacts analysis.

4-6 Air Quality Impacts:

A. Provide additional information, specified below, on air emission inventories expected during road construction, site preparation (pre-construction), construction, and operation of the proposed GLE facility.

1. Provide anticipated $PM_{2.5}$ emissions expected during road construction, site preparation (pre-construction), construction, and operation of the proposed GLE facility.

2. To facilitate the evaluation of impacts on global climate change, provide greenhouse gas emissions (e.g., CO_2) associated with the site preparation (pre-construction), construction, and operation activities for the proposed GLE facility.

3. Provide emissions of criteria pollutants, including both PM_{10} and $PM_{2.5}$, during facility operation from: (1) the GLE mechanical-draft cooling tower; (2) cylinder-handling activities (e.g., diesel-powered gantry or fork lift) between the main GLE buildings and cylinder pads; and (3) hauling traffic of product cylinders between the GLE facility and other facilities at the Wilmington Site.

4. Provide air emissions of criteria pollutants, including both PM_{10} and $PM_{2.5}$, by pollutant and by source category (similar to ER Table 4.6-1) along with emission factors, activity levels, and control efficiencies for road construction, site preparation (pre-construction), construction, and operation of the proposed GLE facility.

Basis: Additional information is needed for NRC to reproduce some of the emissions presented in the ER tables. In addition, emission estimations for some pollutants are not included in the ER.

B. Provide air dispersion modeling for operational emission sources such as auxiliary diesel generator units, cooling tower, and onsite traffic. No air dispersion modeling during facility operation was included in the ER.

C. Provide additional information, specified below, to justify AERMOD modeling choices or provide updated AERMOD analyses taking into account the comments and recommendations listed below. The AERMOD model was used to estimate potential air quality impacts as reported in the ER, but independent analyses conducted by NRC noted discrepancies that diverge from typical air impact modeling practices.

1. Clarification is needed of the unit emission rates that were multiplied by actual emissions. For example, the emission rate for site preparation was estimated to be 1.15×10^{-4} lb/ft^2/work hour (in GLE_construction_phase_emission_factor.xls) but the value is listed as 1.15×10^{-4} lb/ft^2/work day in the summary worksheet which, in turn, was used for the final results. Clarify which unit emission rate is correct and revise the results if necessary.

2. In reporting model results, include background concentrations representative of the Wilmington Site.

   Basis: Total (background plus modeled) concentrations are required to estimate potential air quality impacts because total concentrations are compared with National Ambient Air Quality Standards (NAAQS). Determination of background concentrations might vary from state to state, so the Applicant is encouraged to

consult with North Carolina Department of Environmental and Natural Resources (DENR), Division of Air Quality (DAQ).

3. Provide additional justification of the use of meteorological data from the Wilmington Airport in the AERMOD model or revise the model using data from a site with surface conditions representative of both the measurement and application sites.

   Basis: ER Appendix R (Section R.2) states "the model also requires input values for site-specific factors related to the air emission dispersion characteristics of the landscape surrounding the emission source." Per the AERMET User's Guide and AERMOD Implementation Guide, surface characteristics should represent the surface conditions at the measurement site, not the application site. In particular, the Wilmington airport has open exposures while the GLE site is heavily wooded. Although the Wilmington airport is only 7.2 kilometers (4.5 miles) from the GLE site, its meteorological parameters and surface characteristics are not representative of the GLE site. In this case, the AERMOD Implementation Guide recommends finding another nearby measurement site representative of both the meteorological parameters and surface characteristics at the site of interest. Otherwise, the Guide states that site-specific meteorological data will be required. One option would be to use meteorological data from the Horticultural Crops Research Station operated by North Carolina State University, which is located directly across Castle Hayne Road. Surface characteristics might also be similar to the GLE site after site clearing. The station collects most meteorological parameters for use in AERMET, such as wind speed and direction, air temperature, standard deviation of wind direction, solar radiation, etc. If the station's data recovery rate is greater than 90%, it could be designated as ONSITE in AERMET[1] and meteorological data from the Wilmington airport could be used for any missing meteorological parameters.

4. Provide a justification for the dry and wet deposition used in the PM_{10} modeling or provide an air dispersion modeling analysis with 1) PM_{10} conservatively assumed to act as a gas and 2) no dry and wet deposition.

   Basis: The ER assumes dry and wet deposition for construction-related PM_{10} modeling. Because dry and wet deposition mechanisms are uncertain, they are typically used only in special cases (e.g., deposition impacts on vegetation).

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[1] Typically, threshold wind speed for non-National Weather Service (NWS) data is low (e.g., 0.3 m/s), but that for NWS data is set at 1 m/s by default in AERMET. If you look into AERMET output files for NWS data, the lowest wind speed is 1.5 m/s. Accordingly, AERMOD modeling results using non-NWS data could be approximately 3-5 times higher than using NWS data. No calculations were made for wind speed of less than 1 m/s in old EPA models but AERMOD does. It is known that AERMOD overpredicts for low wind speed and low-level emissions. A revised AERMOD with a fix will be available in few months. Accordingly, modeling results estimated from current AERMOD version are subject to change.

5. Provide a justification as to why the most recent five years of data from the Wilmington International Airport and Morehead City/Newport, North Carolina stations were not used in the analysis or re-perform the analysis using more recent data.

   Basis: The ER states that surface meteorological data from Wilmington International Airport and upper air data from Charleston, South Carolina (7.2 kilometers [4.5 miles] and 240 kilometers [150 miles], respectively, from the proposed GLE facility) were used for the years 1992 through 1996 because this time period encompassed the most recent data available for which surface and upper air data from the two weather stations coincided. However, more recent upper air data are available from Morehead City/Newport, North Carolina, which is closer than Charleston, South Carolina (103 kilometers [64 miles] from the proposed GLE facility) and similarly influenced by coastal climate. Per EPA's "Guideline on Air Quality Models," the most recent, readily available 5-year meteorological data are preferred.

6. Clarify which settings were used to obtain both 24-hour and annual average concentrations and revise the model input parameters to use information representing conditions from 7 a.m. to 4 p.m. of weekends as well as weekdays if necessary.

   Basis: The ER assumes that construction activities would occur 5 days per week and 10 hours per day. In AERMOD, the SHRDOW7 option was used with "on" for 7 a.m. to 4 p.m. of weekday and "off" for other hours of weekday; and "off" for all hours of weekend. Historic meteorological conditions should be used as a spectrum of meteorological conditions that might occur for a given site, so there should be no differentiation between weekday and weekend. In this example, the highest concentrations could be missed if the worst meteorological conditions fall on the weekend.

7. Determine surface moisture conditions used to calculate the Bowen ratio based on the 30-year climatological data for the Wilmington airport (e.g., 1971-2000 normals if 2004-2008 meteorological data are used) or provide additional justification for the use of wet surface moisture conditions to calculate the ratio.

   Basis: ER Appendix R (Section R.2) states "wet surface moisture condition values were used for the Bowen ratio because Wilmington, N.C. has a much higher than average annual rainfall than the average for most of the country." However, per the AERSURFACE User's Guide, the surface moisture condition can be determined by comparing precipitation for the period of data to be processed to the 30-year climatological record.

D. With a typical control efficiency of 50% from water spraying for fugitive dust emissions, preliminary independent analysis conducted by NRC indicates that the total (background plus modeled) 24-hour concentration at the northern site boundaries could exceed the ambient air quality standard during site preparation. Reexamine the assumptions and modeling parameters used to estimate the air quality impacts at these locations and specify the dust control measures that will be used to mitigate the impacts.

4-7 Noise Impacts:

A. Provide the additional information specified below regarding the impacts of auxiliary diesel generator units during facility operation.

   1. Provide modeled noise levels at the nearest subdivision assuming that units are operating for a 24-hour period.

   2. Provide general information about auxiliary diesel generator units, including the source of the noise, noise level and whether the units are in enclosures or not.

4-8 Impacts to Historical and Cultural resources:

A. Provide information on how unexpected discoveries of artifacts or human remains would be addressed if they were encountered during site preparation (pre-construction) and construction activities. Provide information on how site 31NH801 will be protected.

   Basis: Under Section 106 of the National Historic Preservation Act (36 CFR 800), NRC is required to consider the effect of an undertaking on historic properties. The North Carolina State Historic Preservation Office (SHPO) recommended (NC, 2009) that procedures be formalized to address the unexpected discovery of archaeological material or human remains during the project. The SHPO also asked how Site 31NH801 would be protected.

B. ER Supplement 1 noted that the footprint of the project has changed. The new footprint contains areas that have not yet been surveyed for the presence of historic properties. Provide copies of any historic and archaeological surveys and correspondence with the North Carolina SHPO concerning these portions of the GLE study area and information on any historic properties that will be affected by the project.

4-10 Socioeconomic Impacts:

A. For the region of influence, provide estimates of the indirect economic impacts of site preparation (pre-construction), construction, operation, and decommissioning. Indirect impacts could be estimated using input-output multipliers taken from the RIMS II modeling framework, or other similar framework, and should include estimates of impacts on labor income ($ per year) and employment (number of job-years per year).

   Basis: ER estimation of the economic impacts of the various phases of the proposed GLE facility is limited to the direct (on-site) impacts on the facility. The inclusion of estimates of indirect impacts would provide an important indication of the overall impact of the facility on the economy of the ROI.

4-13 Waste Management Impacts:

A. Provide the capacity of the existing sanitary wastewater treatment system at the Wilmington Site, to assure that the system has adequate capacity to handle the additional sanitary waste from the proposed GLE facility as discussed in ER Section 4.13.2.2.1.3.

Basis: ER Section 3.12.2.2 discusses the current facilities available to handle sanitary wastewater, listing the amount discharged in 2006 and the amount allowed by the existing NPDES permit. Information is needed on the actual system capacity, and whether it matches the NPDES permit.

B. Provide the capacity of the final process lagoons for treatment of wastewater at the Wilmington Site, to assure that the wastewater system has adequate capacity to handle the additional process wastewater from the proposed GLE Facility as discussed in ER Section 4.13.4.1

   Basis: ER Section 4.13.4.1 states that the final process lagoons have the capacity to handle the additional load from the proposed GLE facility and other anticipated projects at the Wilmington Site. While it states that the additional effluent would not lead to discharges in excess of the NPDES permit, information is needed on whether the NPDES permit limit matches the capacity of the final process lagoons.

C. Provide the estimated annual average volume of non-compacted construction waste generated by site preparation (pre-construction) activities. Also provide the volume of anticipated hazardous waste from these activities.

   Basis: In response to NRC questions at the site visit, GLE Letter Number GLEL-09-004 (GLE, 2009a) contains information on the amounts of construction wastes that may be generated by construction activities. However, neither this response nor ER Supplement 1 provides separate estimates for site preparation (pre-construction) and construction wastes.

SECTION 6 - ENVIRONMENTAL MEASUREMENTS AND MONITORING PROGRAMS

Pursuant to 10 CFR Part 20, licensees are required to conduct surveys to demonstrate compliance and that radioactive material in effluent discharges is kept as low as reasonably achievable.

6-1 Radiological Monitoring:

A. Provide the locations where Thermo-Luminescent Dosimeters (TLD) would be placed for monitoring the direct radiation from the cylinder pads and other outdoor storage areas, as well as the frequency of radiation surveys that would be conducted in and around storage areas.

   Basis: ER Section 6.1.1 states that “[d]irect radiation monitoring for the cylinder pads and other outdoor storage areas would be accomplished by use of film badges or TLDs.” However, it does not provide the locations where TLDs would be placed and does not specify whether any direct radiation monitoring would be conducted at the site boundary. ER Section 6.1.1 also states that “[p]rogram procedures require periodic surveys to be performed in and around outdoor storage areas to ensure that direct radiation doses are maintained ALARA.” However, there is no information on how often the surveys would be conducted.

6-1 Radiological Monitoring and 6-2 Physicochemical Monitoring:

A. Provide the effluent and surface water monitoring plans (Expanded Monitoring Program) proposed to include the GLE site, or verify that the plans described in ER Section 6.1.3 have been adopted.

B. Provide the groundwater monitoring plan (Expanded Monitoring Program) proposed to include the GLE site, or verify that the plan described in ER Section 6.1.4 has been adopted.

SECTION 7 - COST/BENEFIT ANALYSIS

A. Provide information about any tax incentives provided for the project including, but not necessarily limited to, information about agreements with the State of North Carolina or New Hanover County. This information is necessary to evaluate the private and public costs and benefits of the proposed action.

References

(FWS, 2009) "Docket No. 70-7016; General Electric-Hitachi Global Laser Enrichment Facility, New Hanover County, North Carolina," Letter from Pete Benjamin, U.S. Department of the Interior, Fish and Wildlife Service, to Andrea Kock, U.S. Nuclear Regulatory Commission, June 8, 2009. (ML091700024)

(GLE, 2008). GE-Hitachi Global Laser Enrichment LLC. "Environmental Report for the GLE Commercial Facility, Revision 0." December 2008. (ML090910573)

(GLE, 2009a) GE-Hitachi Global Laser Enrichment LLC. "GE-Hitachi Global Laser Enrichment Submittal of Additional Information Related to NRC Review of GLE Environmental Report," Letter number GLEL-09-004, GE-Hitachi Nuclear Energy, Global Laser Enrichment, LLC, Wilmington, NC. June 8, 2009. (ML092110764)

(GLE, 2009b) GE-Hitachi Global Laser Enrichment LLC. "GE-Hitachi Global Laser Enrichment Submittal of GLE Environmental Report Supplement 1 – Early Construction," GE-Hitachi Nuclear Energy, Global Laser Enrichment, LLC, Wilmington, NC. July 13, 2009. (ML092100577)

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