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Michael T. Lesar, Chief
Rulemaking and Directives Branch
Office of Administration
Mailstop TWB 05–B01M
U.S. Nuclear Regulatory Commission
Washington, DC 20555–0001

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RULES AND DIRECTIVES
BRANCH
USNRC

Dear Mr. Lesar:

This letter is in response to the NRC's March 26, 2010 request for input on the environmental review of Columbia Generating Station's license renewal.

The Washington State Department of Health (DOH) is responsible for protecting the public from exposure to radiation. At the Columbia Generating Station (CGS), we play an active role in ensuring public health. One way we achieve this is through our independent oversight of the CGS Radiological Environmental Monitoring Program (REMP). Another is through coordination with CGS's emergency preparedness group.

Each year DOH and CGS split hundreds of samples of air, groundwater, Columbia River water, soil, sediment, and farm products. DOH's samples are analyzed for radiation at the Public Health Laboratories in Shoreline. We also measure radiation levels at locations where the public resides, and at locations near the plant, including the Independent Spent Fuel Storage Installation. The results of the analyses are used to verify the quality of the CGS results, to look for trends in environmental radiation levels, and to respond to specific incidents when radiation is found at locations where it is not expected. DOH also conducts environmental monitoring of the U.S. Department of Energy's (USDOE) Hanford Site surrounding CGS. These data are available for your environmental review of CGS.

In addition to environmental monitoring, DOH works closely with CGS in developing plans, procedures, and training related to emergency preparedness. During drills and evaluated exercises, DOH and CGS personnel work collaboratively. CGS staff actively asks DOH for comments regarding exercise design, development, and process improvement regarding emergency preparedness.

Over the years of working with CGS staff, analyzing thousands of samples and completing numerous emergency drills and exercises, our relationship and interactions have been

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professional. CGS has proven its dedication to plant safety and shares the common goal of protecting the public and the environment.

CGS is located on USDOE's Hanford Site. In the past, the Hanford Site included nine nuclear reactors and five chemical plants. The reactors and chemical plants are shut down and the mission of the Hanford Site has switched from plutonium production to cleanup and restoration.

DOH identified three potentially significant environmental issues that should be considered for inclusion in the Environmental Impact Statement (EIS). These issues result from the unusual siting of a commercial nuclear power reactor near land previously used for plutonium production, and have emerged since CGS was initially licensed.

Groundwater contamination

Protecting groundwater and subsequently the Columbia River is a priority. The Columbia River is an important resource for drinking water, crop irrigation, and recreation. The groundwater below CGS is contaminated from past Hanford practices. Recently, the NRC directed all commercial nuclear power plants to conduct studies to ensure that plant operation was not impacting groundwater. The environmental review should consider how to best distinguish between the radioactive contamination currently in the groundwater from past Hanford practices, and the contamination that might occur from continued CGS operations.

Cleanup of buried waste sites

During Hanford operations, high level waste was disposed into an unlined waste site, 618-11, directly adjacent to CGS. USDOE expects this site will be the most hazardous waste site remediated at Hanford. Considerable effort has been spent trying to reconstruct what might be buried there, and the best strategy for removing the waste. While USDOE's goal is to remediate this site without spreading any contamination, CGS could be impacted if waste were released during cleanup activities. The environmental review should consider every possible scenario in which cleanup activities might impact CGS operations.

Waste Stabilization

A significant Hanford Site cleanup challenge is stabilizing and disposing of millions of gallons of high level waste stored in underground tanks. Under the cleanup agreement, plutonium and other high level waste will be vitrified to make it stable for disposal. DOH has the authority to issue the air operating permit to USDOE for the Waste Treatment Plant (WTP). The WTP is currently under construction, upwind of CGS, and will be operating during the proposed extended life of CGS. The environmental review should consider potential impacts from the WTP on CGS operations.

If you have any questions regarding these issues, please feel free to contact me at (360) 236-3210.

Sincerely,

Gary Robertson
Director

cc: Stephen Posner, EFSEC
Debra McBaugh, DOH
Leo Wainhouse, DOH