

#### UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001

December 29, 2010

Mr. S.K. Gambhir, Vice President, Technical Services Columbia Generating Station Energy Northwest MD PE04 P.O. Box 968 Richland, WA 99352

## SUBJECT: ISSUANCE OF ENVIRONMENTAL SCOPING SUMMARY REPORT ASSOCIATED WITH THE STAFF'S REVIEW OF THE APPLICATION BY ENERGY NORTHWEST FOR RENEWAL OF THE OPERATING LICENSE FOR COLUMBIA GENERATING STATION (TAC NO. ME3121)

Dear Mr. Gambhir:

The U.S. Nuclear Regulatory Commission (NRC or the staff) conducted a scoping process and solicited public comments from March 11 to May 14, 2010, to determine the scope of the staff's environmental review of the application for renewal of the operating license for Columbia Generating Station (CGS). The scoping process is the first step in the development of a plant-specific supplement to NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants" (GEIS), for CGS. The staff is in the process of revising the GEIS. For this environmental review, the staff relied on the GEIS and Addendum 1 which were issued in 1996 and 1999, respectively (ADAMS Accession Numbers ML040690705, ML040690738, and ML040690720).

As part of the scoping process, the staff held two public environmental scoping meetings in Richland, Washington on April 6, 2010, to solicit public input regarding the scope of the review. In addition to the public scoping meetings, the staff conducted an informational meeting with representatives from several affected American Indian tribes on April 27, 2010. The staff also received written comments by letter and e-mail. At the conclusion of the scoping process, the staff prepared the enclosed environmental scoping summary report identifying comments received during the scoping period. In accordance with 10 CFR 51.29(b), the staff will send a copy of the scoping summary report to all participants in the scoping process.

The transcripts of the public scoping meetings are available for public inspection in the NRC Public Document Room (PDR), located at One White Flint North, 11555 Rockville Pike, Rockville, Maryland 20852, or from the NRC's Agencywide Documents Access and Management System (ADAMS). The ADAMS Public Electronic Reading Room is accessible at <u>http://www.nrc.gov/reading-rm/adams.html</u>. The transcripts for the afternoon and evening meetings are listed under accession numbers ML101241002 and ML101241037, respectively. Persons who encounter problems in accessing documents in ADAMS should contact the NRC's PDR reference staff by telephone at 1-800-397-4209 or 301-415-4737 or by e-mail at <u>pdr.resource@nrc.gov</u>.

S. Gambhir

The draft supplement to the GEIS is scheduled to be issued in late 2011. A notice of the availability of the draft document and the procedures for providing comments will be published in the *Federal Register*. If you have any questions concerning the staff's environmental review of this license renewal application, please contact Mr. Daniel Doyle, Project Manager, at 301-415-3748 or by e-mail at <u>daniel.doyle@nrc.gov</u>.

Sincerely,

Bo M. Pham, Chief Projects Branch 1 Division of License Renewal Office of Nuclear Reactor Regulation

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Docket No. 50-397

Enclosure: As stated

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S. Gambhir

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Sincerely, /**RA**/ Bo M. Pham, Chief Projects Branch 1 Division of License Renewal Office of Nuclear Reactor Regulation

\*concurrence via e-mail

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## Introduction

The U.S. Nuclear Regulatory Commission (NRC) received an application from Energy Northwest (EN), dated January 19, 2010, for renewal of the operating license for Columbia Generating Station (CGS). CGS is located in Richland, Washington. The purpose of this report is to provide a concise summary of the determinations and conclusions reached, including the significant issues identified, as a result of the scoping process in the NRC's environmental review of this license renewal application.

As part of the application, EN submitted an environmental report (ER) (EN, 2010) prepared in accordance with Title 10 of the *Code of Federal Regulations* (CFR) Part 51 which contains the NRC requirements for implementing the National Environmental Policy Act of 1969 (NEPA). The requirements for preparation and submittal of ERs to the NRC are outlined in 10 CFR 51.53(c)(3).

The requirements in section 51.53(c)(3) were based upon the findings documented in NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants" (GEIS) (NRC, 1996), (NRC, 1999). In the GEIS, the staff identified and evaluated the environmental impacts associated with license renewal. After issuing a draft version of the GEIS, the staff received and considered input from Federal and State agencies, public organizations, and private citizens before developing the final document. As a result of the assessments in the GEIS, a number of impacts were determined to be generic to all nuclear power plants (or, in some cases, to plants having specific characteristics such as a particular type of cooling system). These generic issues were designated as "Category 1" impacts. An applicant for license renewal may adopt the conclusions contained in the GEIS for Category 1 impacts unless there is new and significant information that may cause the conclusions to differ from those of the GEIS. Other impacts that require a site-specific review were designated as "Category 2" impacts and are required to be evaluated in the applicant's ER. The Commission determined that the NRC does not have a role in energy-planning decision-making for existing plants. Therefore, an applicant for license renewal need not provide an analysis of the need for power or the economic costs and benefits of the proposed action. Additionally, as stated in 10 CFR 51.23(b), the Commission determined that the ER need not discuss any aspect of storage of spent fuel for the facility that is within the scope of the generic determination in 10 CFR 51.23(a). This determination was based on the Nuclear Waste Policy Act of 1982 and the NRC's Waste Confidence Rule, 10 CFR 51.23.

On March 11, 2010, the NRC initiated the scoping process by issuing a *Federal Register* notice (75 FR 11576). This notified the public of the staff's intent to prepare a plant-specific supplement to the GEIS regarding the application for renewal of the CGS operating license. The plant-specific supplement to the GEIS is also referred to as the Supplemental Environmental Impact Statement or SEIS. The SEIS will be prepared in accordance with 10 CFR Part 51.

The scoping process provides an opportunity for public participation to identify issues to be addressed in the SEIS and to highlight public concerns and issues. The notice of intent identified the following objectives of the scoping process:

- Define the proposed action
- Determine the scope of the SEIS and identify significant issues to be analyzed in depth

- Identify and eliminate peripheral issues
- Identify any environmental assessments and other environmental impact statements being prepared that are related to the SEIS
- Identify other environmental review and consultation requirements
- Indicate the schedule for preparation of the SEIS
- Identify any cooperating agencies
- Describe how the SEIS will be prepared

The NRC's proposed action is whether to renew the Columbia Generating Station operating license for an additional 20 years.

The scope of the SEIS includes an evaluation of the environmental impacts of CGS license renewal and reasonable alternatives to license renewal. The 'Scoping Comments and Responses' section of this report includes specific issues identified by the comments. The subsequent NRC responses explain if the issues will be addressed in the SEIS and, if so, where in the report they will likely be addressed. At the onset of the project, the NRC identified several significant issues for this license renewal, including, but not limited to, the following issues that require a site-specific review: threatened or endangered species, acute effects of electromagnetic fields (electric shock), chronic effects of electromagnetic fields, housing impacts, public services (public utilities and transportation), offsite land use (during the license renewal period), historic and archaeological resources, severe accidents, and environmental justice. Among the significant issues that were identified in the scoping process are the ongoing cleanup of radioactive waste burial grounds on the Hanford Site near CGS and existing groundwater contamination below the CGS site.

Throughout the scoping process, the NRC staff identified and eliminated peripheral (i.e., out-ofscope) issues for the environmental review. This report provides responses to comments that were determined to be out of the scope of the environmental review. For in-scope comments, the staff will consider the comments in the development of the SEIS. A detailed response to inscope comments will be provided, if necessary, in Appendix A of the SEIS.

Another environmental impact statement that is currently being prepared related to this review is the U.S. Department of Energy Tank Closure and Waste Management Environmental Impact Statement for the Hanford Site, Richland, Washington<sup>1</sup>. Appendix G to the SEIS will include a comprehensive list of related projects considered in this review.

In order to meet the requirements of the Magnuson-Stevens Fisheries Conservation and Management Act and Section 7 of the Endangered Species Act, the NRC staff is required to consult with the National Marine Fisheries Service and the U.S. Fish and Wildlife Service to evaluate the potential impacts of continued operation on bull trout, Chinook salmon, steelhead, and the essential fish habitat. In order to fulfill its obligations under the National Historic Preservation Act, the NRC additionally initiated consultation with the Advisory Council on Historic Preservation, the Washington State Historic Preservation Officer, and three

<sup>&</sup>lt;sup>1</sup> Draft document available at: <u>http://www.hanford.gov/page.cfm?page=1118</u>

Federally-recognized American Indian tribes: the Confederated Tribes of the Umatilla Indian Reservation, the Yakama Nation, and the Nez Perce Tribe. The NRC has also met with representatives of the Wanapum Band and contacted other potentially-affected American Indian communities.

The NRC staff expects to publish the draft SEIS in late 2011.

The NRC staff did not identify any cooperating agencies for this review. The NRC, as an independent regulatory agency, routinely and extensively consults with Federal, State, Tribal, and local entities during development of environmental impact statements and environmental assessments. Formal Cooperating Agency status is usually not sought or used.

The SEIS will be prepared by NRC staff with contract support from Pacific Northwest National Laboratories.

The NRC invited the applicant; Federal, State and local government agencies; American Indian tribal governments; local organizations; and individuals to participate in the scoping process by providing oral comments at the scheduled public meetings or by submitting written comments before the end of the scoping comment period on May 14, 2010. The scoping process included two public meetings which were held on April 6, 2010, at the Richland Public Library, 955 Northgate Drive, Richland, Washington 99352. The NRC issued press releases, purchased newspaper advertisements, and distributed flyers locally to advertise these meetings. Approximately 40 people attended the meetings. Each session began with NRC staff members providing a brief overview of the license renewal process and the NEPA environmental review process. Following the NRC's prepared statements, the floor was opened for public comments. Ten attendees provided oral comments that were recorded and transcribed by a certified court reporter. The transcripts of the comments from these meetings are included at the end of this report. The NRC issued a summary of the scoping meetings on May 10, 2010 (NRC, 2010a).

In addition to the April 6 public scoping meetings, the staff conducted an informational meeting with representatives from several affected American Indian tribes on April 27, 2010 (NRC, 2010b). The comments from the tribal representatives were recorded in the meeting notes which are also included in this report.

All documents associated with this scoping process are available for public inspection in the NRC Public Document Room (PDR), located at One White Flint North, 11555 Rockville Pike, Rockville, Maryland 20852, or from the NRC's Agencywide Documents Access and Management System (ADAMS). The ADAMS Public Electronic Reading Room is accessible at <a href="http://www.nrc.gov/reading-rm/adams.html">http://www.nrc.gov/reading-rm/adams.html</a>. Persons who encounter problems in accessing documents in ADAMS should contact the NRC's PDR Reference staff by telephone at 1-800-397-4209 or 301-415- 4737 or by e-mail at <a href="http://www.nrc.gov/neading-thenaitte.com">pdr.resource@nrc.gov</a>. The ADAMS accession number for each document is listed below in Table 1.

In addition to the comments received at the meetings, the NRC also received 11 letters and one e-mail with comments about the review. At the conclusion of the scoping period, the staff reviewed the transcripts, meeting notes, and all written material received in order to identify individual comments. Each comment was marked with a unique identifier including the Commenter ID (specified in Table 1) and a comment number, allowing each comment to be traced back to the transcript, letter, or e-mail in which the comment was submitted. Comments were consolidated and categorized according to the topic within the proposed SEIS or according

to the general topic if outside the scope of the GEIS. Once comments were grouped according to subject area, the staff determined the appropriate action for the comment. The action or resolution for each comment is described in the staff's responses in this report.

Table 1 identifies the individuals providing comments and the assigned Commenter ID. For oral comments, the individuals are listed in the order in which they spoke at the public meeting. Accession numbers identify the source document of the comment in ADAMS.

Commenter	Affiliation (If Stated)	Comment Source	Commenter ID	ADAMS Accession Number
John Greenhill		E-mail	А	ML100920546
Jerome Delvin	Washington State Senate	Letter	В	ML100980062
David V. Taylor, et al.	Washington State Legislature	Letter	С	ML101040675
James O. Luce	State of Washington Energy Facility Site Evaluation Council	Letter	D	ML101050307
Brad Peck, Rick Miller, and Robert Koch	Franklin County Board of Commissioners	Letter	Е	ML101110052
Tim Sheldon	Washington State Senate	Letter	F	ML101110053
Russell Jim	Confederated Tribes and Bands of the Yakama Nation	Letter	G	ML101160435
Larry Haler, Brad Klippert, Maureen Walsh, and Terry Nealey	State of Washington House of Representatives	Letter	н	ML101110054
Tim Sheldon, et al.	Washington State Senate	Letter	I	ML101170056
Phil Rockefeller	Washington State Senate	Letter	J	ML101180459
Gary Robertson	State of Washington Dept of Health	Letter	К	ML101460059

 TABLE 1. Individuals Providing Comments During The Scoping Comment Period

Commenter	Affiliation (If Stated)	Comment Source	Commenter ID	ADAMS Accession Number
Ed Revell	City of Richland	Afternoon Scoping Meeting	L	ML101241002
Brad Peck	Franklin County	Afternoon Scoping Meeting	М	ML101241002
Steve Lee	Pasco Chamber of Commerce	Afternoon Scoping Meeting	Ν	ML101241002
Bob Link	AREVA	Afternoon Scoping Meeting	0	ML101241002
Lori Sanders	Benton County PUD, EN Board of Directors	Afternoon Scoping Meeting	Ρ	ML101241002
Alvin Ankrum	Pacific Northwest National Laboratory (PNNL)	Evening Scoping Meeting	Q	ML101241037
Ed Harrington		Evening Scoping Meeting	R	ML101241037
Dan Jordheim		Evening Scoping Meeting	S	ML101241037
Gene Kinsey		Evening Scoping Meeting	Т	ML101241037, ML101960547
Carrie Mathews	PNNL	Evening Scoping Meeting	U	ML101241037
Barbara Harper	Confederated Tribes of the Umatilla Indian Reservation (CTUIR)	Tribal Outreach Meeting	V	ML102630228
Wade Riggsbee	Confederated Tribes and Bands of the Yakama Nation	Tribal Outreach Meeting	W	ML102630228
Dave Rowland	Confederated Tribes and Bands of the Yakama Nation	Tribal Outreach Meeting	х	ML102630228
Various Tribal Representatives	See list of attendees in meeting summary	Tribal Outreach Meeting	Y	ML102630228
Judy Ridge, et al.	Washington public power utilities	Letter	Z	ML103230048

The comments and suggestions received as part of the scoping process are documented in this section and the disposition of each comment is discussed. The formatting of the comment in the source document is not necessarily preserved. The meeting transcripts and written comments are included in their original form at the end of this report.

Comments have been grouped into general categories.

In-scope comments:

- 1. General comments in support of EN, nuclear power, and license renewal for CGS (PRO)
- 2. Alternatives to license renewal of CGS (ALT)
- 3. Socioeconomic impact of CGS (SOC)
- 4. Greenhouse gas or carbon impact of CGS (GHG)
- 5. Other comments within the scope of NRC's environmental review (OTH, SAMA<sup>2</sup>)

Out-of-scope comments:

- 6. Long-term storage of waste (WST)
- 7. Other comments outside the scope of NRC's environmental review (OOS)

In those cases where no new environmental information was provided by the commenter, only a brief response has been provided to the comment, and no further evaluation will be performed.

The preparation of the SEIS will take into account all the in-scope issues raised during the scoping process. The SEIS will address both Category 1 and 2 issues along with any new information identified as a result of the scoping process. The SEIS will rely on conclusions supported by information in the GEIS for Category 1 issues and will include analysis of Category 2 issues and any new and significant information. The NRC will issue a draft SEIS for public comment. The comment period will offer the next opportunity for the applicant, interested Federal, State, and local government agencies, American Indian tribal governments, local organizations, and other members of the public to provide input to the NRC's environmental review process. The comments received on the draft SEIS will be considered in the preparation of the final SEIS. The final SEIS, along with the staff's safety evaluation report (SER), will provide much of the basis for the NRC's decision on the EN application to renew the license of CGS.

<sup>&</sup>lt;sup>2</sup> Severe Accident Mitigation Alternatives

## Columbia Generating Station Scoping Comments and Responses

## In-Scope Comments

## 1. General comments in support of Energy Northwest, nuclear power, and license renewal for Columbia Generating Station (PRO)

The comments in this category can be found at the back of this report and are labeled with the following identifiers: B-1-PRO, C-1-PRO, C-3-PRO, D-1-PRO, D-3-PRO, E-1-PRO, H-1-PRO, I-1-PRO, J-2-PRO, K-2-PRO, L-2-PRO, L-4-PRO, L-6-PRO, O-1-PRO, O-3-PRO, O-4-PRO, O-5-PRO, P-3-PRO, Q-1-PRO, R-1-PRO, S-2-PRO, T-2-PRO, U-1-PRO, and Z-1-PRO.

**Response:** These comments are general in nature and express support for Energy Northwest (EN), nuclear power, or license renewal of Columbia Generating Station (CGS). The comments provide no new and significant information and will not be evaluated further in the development of the SEIS.

## 2. Alternatives to license renewal of CGS (ALT)

The comments in this category can be found at the back of this report and are labeled with the following identifiers: E-4-ALT, M-2-ALT, M-3-ALT, L-3-ALT, P-2-ALT, T-1-ALT.

**Response:** These comments refer to the alternatives to license renewal of Columbia Generating Station, including the alternative of not renewing the operating license, also known as the "no-action" alternative. The staff will evaluate all reasonable alternatives in Chapter 8 of the SEIS. Appendix A of the draft SEIS will include expanded responses to these comments as well as the other comments that are within the scope of the NRC's environmental review.

## 3. Socioeconomic impact of CGS (SOC)

The comments in this category can be found at the back of this report and are labeled with the following identifiers: B-2-SOC, E-3-SOC, F-2-SOC, N-1-SOC, N-3-SOC.

**Response:** These comments address the socioeconomic impact of CGS. They are supportive of the applicant, in general, and also address the socioeconomic benefits of CGS on local/regional communities and economy, including other related issues such as employment, taxes, and education. The staff will address the socioeconomic impact of renewing the CGS operating license in Chapters 2 and 4 of the SEIS. In addition, the socioeconomic impact of not renewing the operating license will be discussed in Chapter 8. Appendix A of the draft SEIS will include expanded responses to these comments as well as the other comments that are within the scope of the NRC's environmental review.

## 4. Greenhouse gas or carbon impact of CGS (GHG)

The comments in this category can be found at the back of this report and are labeled with the following identifiers: C-2-GHG, E-2-GHG, F-1-GHG, J-1-GHG, N-2-GHG, O-2-GHG, P-1-GHG, S-1-GHG.

**Response:** These comments are generally supportive of license renewal and describe CGS as a source of power with low carbon emissions when compared to fossil fuel-powered sources. Greenhouse gas emissions of the nuclear fuel cycle will be discussed in Chapter 6. Finally, the environmental impacts of reasonable alternatives will be discussed in Chapter 8 of the SEIS, including air emissions. Appendix A of the draft SEIS will include expanded responses to these comments as well as the other comments that are within the scope of the NRC's environmental review.

## 5. Other comments within the scope of the NRC's environmental review (OTH, SAMA)

The comments in this category can be found at the back of this report and are labeled with the following identifiers: A-1-SAMA, D-2-OTH, K-1-OTH, K-3-OTH, K-4-OTH, K-5-OTH, Y-1-OTH, V-2-OTH, V-3-OTH, V-4-OTH, V-5-OTH, V-6-OTH, V-7-OTH, V-8-OTH, V-9-OTH.

**Response:** These comments address a variety of topics within the scope of the NRC's environmental review. They will be considered in the development of the draft SEIS. Appendix A of the draft SEIS will include expanded responses to these comments as well as the other comments that are within the scope of the NRC's environmental review.

Topics addressed by these comments include:

- Risk from solar storms in the severe accident mitigation alternatives (SAMA) analysis
- Wastewater discharges
- Existing groundwater contamination
- Additional radiation data that is available from the Washington State Dept. of Health
- DOE 618-11 Burial Ground
- DOE Waste Treatment Plant
- Tribal participation in the environmental review
- Environmental Justice
- Proposed energy park near CGS
- Tribal scenarios for dose assessment
- Review schedule flexibility to accommodate tribal input
- Mitigation in the original environmental analysis

## Out-of-Scope Comments

## 6. Long-term storage of waste (WST)

**Comment G-1-WST:** I am writing to urge the Nuclear Regulatory Commission to strengthen efforts to ensure the safe and secure storage of spent power reactor fuel at the Columbia Generating Station (CGS) located on the U.S. Department of Energy's Hanford site. In light of the decision by President Obama to cancel the Yucca Mountain nuclear waste repository, the timely disposal of spent power reactor fuel can no longer be assumed. Instead there is a growing likelihood that spent power reactor fuel will accumulate and remain at reactor sites for an indefinite period.

In particular, we urge the NRC to end its policy of allowing dense compaction of spent fuel in pools and require highly radioactive fuel assemblies greater than five years old be placed into

dry, hardened storage modes capable of withstanding aerial impacts, earthquakes and acts of malice.

The Hanford site is located on land to which the Yakama Nation has perpetual rights under the Treaty of June 9, 1855. The Federal government maintains a special trust relationship with Indian tribes pursuant to treaties, statutes, Executive Orders, judicial decisions and other legal instruments. Inherent in this relationship is an enforceable fiduciary responsibility to the Yakama Nation to protect its lands and resources. Moreover, the Yakama Reservation is within the 50-mile Ingestion Pathway Zone if a major radiological release were to occur at the Columbia Generating Station.

As you may know, the CGS is a Boiling Water Reactor Mark II that began operation in 1984. It is in the early process of extending its operating license, which expires in December 2023. This reactor has generated approximately 500 metric tons of spent fuel. Over the next several decades the radioactive inventory in spent fuel at the Columbia Generating Station is estimated to more than quadruple. The major preponderance of spent fuel at the CGS is densely compacted in an above ground pool, well above grade. On average, spent fuel ponds hold five to 10 times more long-lived radioactivity than a reactor core. Particularly worrisome is the large amount of cesium 137 in fuel ponds, which contain anywhere from 20 to 50 million curies of this dangerous isotope.

For the past several years, the NRC has sponsored research which indicated that consequences from drainage of spent fuel pools from accidents and earthquakes could be considerable. For instance, a 1997 report for the NRC by Brookhaven National Laboratory found that a severe pool fire could render about 188 square miles uninhabitable, cause as many as 28,000 cancer fatalities, and cost \$59 billion in damage. But, the frequency of these events was considered to be quite small.

In 2002, Attorneys General from states hosting most of the nation's nuclear power plants called upon the U.S. Congress to pass legislation to "enhance protections for one of the most vulnerable components of a nuclear power plant—its spent fuel pools."

In 2003 an independent study reported that drainage of a spent fuel pool by a terrorist attack could result in as much as 27,000 square miles of severe land contamination. This was the first study to consider potential risks of terrorist attacks on spent fuel pools.

In response, the U.S. Congress requested the National Academy of Sciences to convene a special panel to address this concern. In 2005 the Academy panel warned that,"...under some conditions, a terrorist attack that partially or completely drained a spent fuel pool could lead to a propagating zirconium cladding fire and the release of large quantities of radioactive materials to the environment." The panel also noted that, "pools are potentially susceptible to attacks from above or from the sides depending on their elevation with respect to grade and the presence of surrounding shielding structures." Because of the sensitivity of the subject, the panel submitted classified findings and recommendations to the NRC.

The Academy panel also visited German nuclear sites, where spent fuel pools are under heavy containment or stored in dry casks, which are placed in earthen berms or thick-wall structures. The German nuclear industry took these steps 25 years ago in response to fighter jet crashes and concerns over acts of terror.

We note that the NRC is working on a new "waste confidence" policy. We urge that this new policy not be contingent on the timely opening of a high-level waste repository, but rather on the safety and security of spent fuel storage, which may unfortunately, extend into the indefinite future. Specifically, we urge that license extensions being sought, including that for the Columbia Generating Station be contingent on emplacement of spent fuel greater than five years of age, in dry, hardened storage. Future reactors should be required to have spent fuel pools under heavy containment.

I look forward to your response.

**Comment L-5-WST:** The only concern that I have that's worth mentioning is where it involves the ultimate disposal of spent nuclear fuel. The community has got concerns on how long storage of spent nuclear fuel will be handled by the Department of Energy. I know that's outside the control of NRC and Columbia Generating Station or Energy Northwest. But it is an issue that needs to be addressed because, you know, the administration's trying to shutdown Yucca Mountain. However, this community is very used to working with nuclear materials. I know the storage containers that the fuel is in really would allow that fuel to be stored for a long time onsite but that's not really the contract so to speak, that the utilities had with the Federal Government. And I don't know if you'll be addressing that or not in your review. And I don't see it as a show stopper for us here because we are, as I said, a nuclear community. And we have the capability to do long term storage here but it's not something we're really looking forward to.

**Response:** These comments address concerns about the long-term onsite storage of spent nuclear fuel. NRC responded by letter directly to Mr. Russell Jim about the concerns he expressed in his letter. The ADAMS accession number for the NRC's response is ML101300463. The safety and environmental effects of long-term storage of spent fuel onsite have been assessed by the NRC, and, as set forth in its Waste Confidence Decision (codified at 10 CFR 51.23), the Commission generically determined that such storage could be accomplished without significant environmental impact. In the Waste Confidence Decision, the Commission determined that spent fuel can be stored onsite for at least 30 years beyond the license operating life, which may include the term of a renewed license. At or before the end of that period, the fuel would be removed to a permanent repository. In its Statement of Consideration for the 1990 update of the Waste Confidence Decision (55 FR 38472), the Commission addressed the impacts of both license renewal and potential new reactors. In its December 6, 1999, review of the Waste Confidence Decision (64 FR 68005), the Commission reaffirmed the findings in the rule. In addition to the conclusion regarding safe onsite storage of spent fuel, the Commission states in the rule that there is reasonable assurance that at least one geologic repository will be available within the first quarter of the 21st century, and sufficient repository capacity for the spent fuel will be available within 30 years beyond the licensed life for operation of any reactor. On October 9, 2008, the Commission issued a proposed revision of the Waste Confidence Decision in the Federal Register (73 FR 59551) for comment. This revision provided the basis for extending the time for sufficient repository capacity for spent fuel to be available from within 30 years beyond the licensed life for operation of any reactor to within 50 to 60 years. The proposed revision also provides reasonable assurance that spent fuel can be stored without significant environmental impacts for at least 60 years beyond the licensed life for reactor operation assuming storage of spent fuel in either a spent fuel storage basin or onsite or offsite independent spent fuel storage installation. On September 15, 2010, the Commission approved a final revision to the agency's "Waste Confidence" findings and regulation. expressing the Commission's confidence that the nation's spent nuclear fuel can be safely stored for at least 60 years beyond the licensed life of any reactor and that sufficient

repository capacity will be available when necessary. In addition, the Commission directed the NRC staff to conduct additional analysis for longer-term storage to ensure that the NRC remains fully informed by current circumstances and scientific knowledge relating to spent fuel storage and disposal (NRC, 2010c).

Accordingly, as discussed above and as specified by 10 CFR 51.23(b), no site-specific discussion of any environmental impact of spent fuel storage in reactor facility storage pools or ISFSIs is required in an environmental impact statement associated with license renewal.

These comments are not within the scope of the environmental review and will not be evaluated further in development of the SEIS.

## 7. Other comments outside the scope of NRC's environmental review (OOS)

**Comment L-1-OOS:** I'm Ed Revell. Mayor Pro Tem for the City of Richland. And these are just more curiosity questions. What was the design life of the Columbia Generating Station and will you all be doing any special materials testing so you can evaluate certain kinds of equipment before you decide to go forward?

**Response:** These topics, design life and materials, are addressed in the NRC's safety review of the license renewal application and will be described in the staff's Safety Evaluation Report. In the safety review, the staff examines EN's programs and processes designed to manage the effects of aging and ensure adequate protection of the public's health and safety during the 20-year license renewal period. This includes understanding component design life and may result in additional tests or inspections, as required.

This is separate from the environmental review which focuses on the environmental impacts of license renewal rather than on technical issues related to reactor safety. However, safety issues become important to the environmental review when they could result in environmental impacts. For this reason, the environmental effects of postulated accidents will be considered in the SEIS. The NRC has codified regulations for conducting an environmental impact statement separate from the regulations for reviewing safety issues during its review of a license renewal application. The regulations governing the environmental review are contained in 10 CFR Part 51, and the regulations for the safety review are contained in 10 CFR Part 54. Because the two reviews are separate, operational safety issues and safety issues related to aging are considered outside the scope for the environmental review, just as the environmental issues are not considered as part of the safety review.

These comments are not within the scope of the environmental review and will not be evaluated further in development of the SEIS.

**Comment M-1-OOS:** Will the EIS process take into consideration the negative consequences for the region's power supply if the plant is not relicensed?

**Response:** The need for power is outside the scope of license renewal pursuant to 10 CFR 51.95(c)(2).

The regulatory authority over licensee economics (including the need for power) falls within the jurisdiction of the states and to some extent within the jurisdiction of the Federal Energy Regulatory Commission. The proposed rule for license renewal had included a cost-benefit analysis and consideration of licensee economics as part of the NEPA review. However, during

the comment period, state, Federal, and licensee representatives expressed concern about the use of economic costs and cost-benefit balancing in the proposed rule and the GEIS. They noted that the President's Council on Environmental Quality (CEQ) regulations interpret NEPA to require only an assessment of the cumulative effects of a proposed Federal action on the natural and man-made environment and that the determination of the need for generating capacity has always been the states' responsibility. For this reason, the purpose and need for the proposed action (i.e., license renewal) is defined in the GEIS as follows:

The purpose and need for the proposed action (renewal of an operating license) is to provide an option that allows for power generation capability beyond the term of a current nuclear power plant operating license to meet future system generating needs, as such needs may be determined by State, licensee, and, where authorized, Federal (other than NRC) decision-makers.

Section 51.95(c)(2) of 10 CFR states that:

The supplemental environmental impact statement for license renewal is not required to include discussion of need for power or the economic costs and economic benefits of the proposed action...except insofar as such benefits and costs are either essential for a determination regarding the inclusion of an alternative in the range of alternatives considered or relevant to mitigation.

Since the need for power is outside the scope of the environmental review, this topic will not be evaluated further in development of the SEIS.

**Comment V-1-OOS:** Dr. Barbara Harper of the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) responded to introductory remarks by asking if she could contact the Intergovernmental Liaison Branch to find out, for example, with whom to speak regarding (DOE Order) 435.1 rulemaking efforts. She stated that NRC dose limits differ from those of the DOE and EPA. She asked which dose limits they should use as the standard.

**Response:** There is an existing effort at NRC and DOE to implement rules that are complementary regarding dose limits. Part 61 rulemaking at NRC regarding waste classification will seek to rectify the discrepancy. DOE and NRC are in discussions to meet in 2011 regarding the issue.

This comment is not within the scope of the environmental review and will not be evaluated further in development of the SEIS.

**Comment W-1-OOS:** Mr. Riggsbee, Yakama Nation, asked whether [PNNL's involvement in the Energy Park proposal] poses a potential conflict of interest because the NRC is using PNNL as a contractor in the license renewal review.

**Response:** Both the Atomic Energy Act of 1954, as amended, and NRC's implementing regulations require NRC to avoid, eliminate, and/or mitigate organizational conflicts of interest. In its proposal to NRC, the DOE laboratory provided information regarding all ongoing or proposed work (whether by the laboratory or by any contractor or subcontractor that the laboratory intends to use) in the same or similar technical area as the project Statement of Work. This information enabled NRC to determine whether any actual or potential organizational conflict of interest would exist if the NRC were to place the work with the

laboratory through DOE. This information was reviewed carefully by several NRC staff qualified and trained in regulations regarding organizational conflicts of interest, as well as by the Office of General Counsel, for any conflict of interest that could call into question the soundness of the technical work product. Additionally, the NRC reviewed this information to identify any appearance of an organizational conflict of interest that could diminish the public's confidence in the NRC.

As part of its standard contract review process, the NRC did not identify any organizational conflict of interest in using PNNL personnel for the Columbia license renewal environmental review. Given the commenter's specific reference to the Energy Park proposal, the NRC requested additional disclosure by PNNL to identify any other potential conflict of interest. PNNL has indicated that none of the PNNL personnel on the Columbia license renewal review had any involvement in the Energy Park proposal. Additionally, in order to mitigate the appearance of an organizational conflict of interest, the NRC requested that the laboratory forgo any work in the areas of health physics/human health and cumulative impacts where the NRC staff felt that there could be an appearance of an organizational conflict of an organizational conflict of an organizational conflict of an organizational conflict.

The SEIS is NRC's product, and the NRC staff has ultimate oversight of every subject area the SEIS describes, providing the NRC's assessment of the environmental impact of license renewal. However, the areas of health physics/human health and cumulative impacts were singled out and were entirely produced by NRC staff to remove any appearance of an organizational conflict of interest.

This comment is not within the scope of the environmental review and will not be evaluated further in development of the SEIS.

**Comment X-1-OOS:** Dave Rowland, Yakama Nation, asked about Emergency Planning and expressed dissatisfaction with the level of interaction between EN and the Yakama Nation.

**Response:** Emergency planning is not within the scope of the license renewal as set forth in 10 CFR Parts 51 and 54, as it is addressed as a current licensing issue on an ongoing basis. The NRC has regulatory requirements in place under 10 CFR Part 50 to ensure that licensees have adequate emergency planning and evacuation programs in place in case of an accident/emergency scenario. Such plans are evaluated by the NRC and coordinated with the Federal Emergency Management Agency (FEMA) and local authorities for implementation. Drills and exercises are conducted periodically to verify the adequacy of the plans. Issues identified during such exercises are resolved within the context of the current operating license and are not reevaluated as part of license renewal.

This comment is not within the scope of license renewal and will not be evaluated further in development of the SEIS.

## References

10 CFR 50. *Code of Federal Regulations*, Title 10, *Energy*, Part 50, "Domestic Licensing of Production and Utilization Facilities."

10 CFR 51. *Code of Federal Regulations*, Title 10, *Energy*, Part 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions."

10 CFR 54. *Code of Federal Regulations*, Title 10, *Energy*, Part 54, "Requirements for Renewal of Operating Licenses for Nuclear Power Plants."

Energy Northwest (EN). 2010. License Renewal Application, Columbia Generating Station, "Appendix E, Applicant's Environmental Report, Operating License Renewal Stage," ADAMS Accession No. ML100250666

National Environmental Policy Act of 1969 (NEPA). 42 U.S.C. 4321, et seq.

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U.S. Nuclear Regulatory Commission (NRC). 1996. *Generic Environmental Impact Statement for License Renewal of Nuclear Plants*, NUREG-1437, Volumes 1 and 2, Washington, D.C., ADAMS Accession Nos. ML040690705 and ML040690738.

U.S. Nuclear Regulatory Commission (NRC). 1999. *Generic Environmental Impact Statement for License Renewal of Nuclear Plants, Main Report,* "Section 6.3 – Transportation, Table 9.1, Summary of Findings on NEPA Issues for License Renewal of Nuclear Power Plants, Final Report," NUREG-1437, Volume 1, Addendum 1, Washington, D.C., ADAMS Accession No. ML040690720.

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U.S. Nuclear Regulatory Commission (NRC). 2010. "Energy Northwest; Notice of Intent to Prepare an Environmental Impact Statement and Conduct the Scoping Process for Columbia Generating Station," *Federal Register*, Vol. 75, No. 47, pp. 11576-11578, March 11, 2010.

U.S. Nuclear Regulatory Commission (NRC). 2010a. "Summary of Public License Renewal Overview and Environmental Scoping Meetings Related to the Review of the Columbia Generating Station License Renewal Application (TAC Nos. ME3058 and ME3121)," ADAMS Accession No. ML101250540.

U.S. Nuclear Regulatory Commission (NRC). 2010b. "Summary of Tribal Outreach Informational Meeting Concerning Columbia Generating Station License Renewal and Hanford Low-Level Waste," ADAMS Accession No. ML102630228.

U.S. Nuclear Regulatory Commission (NRC). 2010c. Memorandum, "Staff Requirements – Affirmation Session, 8:45 a.m., Wednesday, September 15, 2010, Commissioners' Conference Room, One White Flint North, Rockville, Maryland (Open to Public Attendance)," ADAMS Accession No. ML102580229.

## **Comment Letters and Meeting Transcripts**

The following pages contain the comments, identified by commenter designation and comment number, from letters, public scoping meeting transcripts, and the informational meeting with tribal representatives conducted on April 27, 2010.

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From: Sent: To: Cc: Subject:	Greenhill, John [John.Greenhill@dhs gov] Wednesday, March 31, 2010 6:23 PM Gettys@nrc.gov; Doyle, Daniel Eccleston, Charles Re- licensing of Columbia Generating Station	ECEIVE	NPR - I AN I	LES AND DIFECT
Follow Up Flag: Flag Status:	Follow Up Flagged (1) 75/=R 11572	Ð	00 0	IVES

Dear Sirs,

I submitted the following question to the environmental scoping meeting on 11//2009 of the Salem and Hope Creek nuclear relicensing and feel it is also applies Columbia Generating Station.

The TMI Generic Environmental Impact Statement for License (NUREG-1437 Supplement 37) table 5-2 shows the following

Initiating Event	CDF (Per Year)	% Contribution to CDF	
Loss of Offsite Power	7.73 x 10 <sup>-6</sup>	32.6	
Transients	5.80 x 10 <sup>-6</sup>	24.5	
Small and Very Small LOCA	4.66 x 10 <sup>-6</sup>	19.7	
Loss of Nuclear Service River Water	3.67 x 10 <sup>-6</sup>	15.5	
Steam Generator Tube Rupture	9.93 x 10 <sup>-7</sup>	4.2	
Internal Floods	4.50 x 10 <sup>-7</sup>	1.9	
Large and Medium LOCA	2.06 x 10 <sup>-7</sup>	< 1	
ISLOCA	1.80 x 10 <sup>-7</sup>	<1	
Total CDF (internal events)	<b>2.37</b> x 10 <sup>-5</sup>	100	

Table 5-2. TMI-1 Internal Events Core Damage Frequency

The probability of a super solar storm of the 1859 or 1921 size is about 1/100 years or 1 %/year. This size storm could lead to a continental wide, long term (many months) outage of the bulk power grid because of damage to all the U.S. step-up EHV transformers. This damaged would be similar to the damage that occurred at Salem New Jersey in 1989 during a fairly mild solar storm. With such an outage, the emergency generators (that drive the cooling pumps) fuel supply could run out and may not be replaced because all the commercial fuel suppliers would be out of fuel as well due to the failure of the electrical pumps. Without fuel for the cooling pumps, the core damage frequency (CDF) appears to be several orders larger that the CDF given in the table 5-2. Perhaps s solar storm initiating event should be included in all the final EIS documents...

A-1-SAMA

John D. Greenhill Department of Energy National Communications System Department of Homeland Security E-mail: john.greenhill@dhs.gov

Phone: 703-235-5538 SUNSI REVIEW Complete Memplate = ABH-013

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- 18 -

RULES AND DIRECTIVES BRANCH USNRC

(360) 786-7614

FAX: (360) 786-7524

e-mail:/delvin.jerome@leg.wa.gov

B-1-PRO

B-2-SOC

## Washington State Senate 2010 APR -6 PM 2: 49 Senator Jerome Delvin

Republican Deputy Whip

8th Legislative District

Olympia Office: 201 Irving R. Newhouse Building PO Box 40408 Olympia, WA 98504-0408

March 31, 2010

Michael T. Lesar, Chief Rulemaking and Directives Branch Office of Administration Mailstop TWB 05-BOIM U.S. Regulatory Commission Washington, D.C. 20555-001

3/11/2010 75 F.R. 11285

Dear Chief Lesar,

It is a pleasure to lend my support for the Columbia Generating Station's license renewal. I am pleased you have decided to extend operations beyond its 40-year original operating license.

As the sole nuclear power capability in the Pacific Northwest, Columbia Generating Station's baseload operations help guarantee a supply of clean, low-cost electricity to Washington's communities and industries. It also provides security to the region's electric power system. المرجعة والمتعام

Nuclear power is one of few energy resources that can produce large amounts of electrical capacity on demand without harming the environment. Along with hydropower, wind, solar and other sources of clean energy, Washington needs the Columbia generating Station's electric power-generating capacity. It ensures a reliable and cost-effective baseline upon which to diversity the state's power generation mix. Approval of the Columbia Generating Station's license renewal application will be a vital step towards helping secure our economic, environmental and security interests.

Most importantly, extending the life of the Columbia Station is integral to Washington's economic success. In addition to paying millions of dollars each year in tax revenues to the state and municipal governments, Columbia is one of the largest employers in the Tri-Cities, providing full-time employment to more than 1,100 workers who, in turn, significantly invest in our state and local economy.

Your approval will ensure a reasonable cost for power in Washington and help drive a strong economy. AL 1 1 101:12

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Committees: Economic Development, Trade & Innovation • Environment, Water & Energy • Transportation

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## Mashington State Legislature<sup>PR 13</sup> M 9:09

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3/11/2010 15 FR 11572

April 2, 2010

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Michael T. Lesar Chief, Rulemaking and Directives Branch Office of Administration Mailstop TWB 05-BOIM U. S. Regulatory Commission Washington, D.C. 20555-001

Dear Mr. Lesar:

We strongly share our support of Energy Northwest's license renewal for Columbia Generating Station nuclear power plant, to extend the operating license through 2043.

For more than 25 years, Columbia has provided valuable electricity to the region and assisted in economic stability to the state by providing clean, affordable energy to more than a million Washington residents.

A's energy demand increases and climate change becomes a significant public policy issue, a diverse mix of clean energy resources will be critical to meet increasing electricity needs. For these reasons, it is imperative to maintain the vast quantity of carbon-free and baseload power Columbia Generating Station provides.

We fully support Columbia receiving the 20-year license renewal from the Nuclear Regulatory Commission and encourage others to voice their support enabling the region to continue benefiting from this clean, affordable electricity.

Sincerely,

Signed by the following members of the Washington State Legislature:

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Larry Crouse 4th Disa Joel Kretz Brad Klippert Sth Klyzont Norm Johnson 14th ta Uneon Ferry R. Nealey 167 R. nealey Pm a CANY CONDOND 12 rep. Larry Heler sthe Rep MOTTHEWT. SHEA 4 IH Norma Smith 10th Russe 39TE Skip PRIET 30Th /L 20" Richard DuBolt Tolume and Jim McCone 13th Bill Hinkle Buce Chandler 15th BRUCE CHANDLER

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April 6, 2010

Mr. Michael T. Lesar, Chief

Office of Administration Mailstop: TWB 05-B01M

Rulemaking and Directives Branch

U.S. Nuclear Regulatory Commission Washington, D.C. 20555-0001

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3/11 /2010 <sup>175</sup> FR. 11572

Subject: Columbia Generating Station License Renewal Application Review

Dear Mr. Lesar:

As@Chair@of@the) Washington@State@Energy@Facility\_Site\_Evaluation Council (Council or EFSEC), (I) want to take this, opportunity to comment on the application for the renewal of the operating license for the Columbia Generating Station (CGS), an operating nuclear power plant located on the Hanford Site in Benton County, Washington. My understanding is that the U.S. Nuclear Regulatory Commission (NRC) is seeking comments on the CGS renewal application as part of its environmental review in evaluating the impacts of extending the plant's operating license for an additional twenty years through 2043.

In addition to receiving construction and operation license from the NRC, in 1972 the state of Washington issued a Site Certification Agreement (SCA) for the Columbia Generating Station that set out the construction and operation terms and conditions for CGS pursuant to state environmental and public health and safety regulations. EFSEC administers the SCA and has maintained regulatory oversight of the CGS facility/site since construction began in the 1970's and the plant began commercial operations in December 1984 action Stre Englander

D-1-PRO

Dear Mr. Lesar:

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Mr. Michael T. Lesar April 6, 2010 Page 2 of 3

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Through contracts with key state agencies, the Council monitors environmental and safety aspects of CGS operations that include: radiological monitoring; environmental sampling and data analysis; wastewater discharge and water quality monitoring; sanitary waste treatment and landfill operations; waste disposal operations; building code and fire protection inspections; air emissions monitoring; and wildlife and habitat protection. The Council's ongoing oversight of CGS operations provides assurance that the plant is in compliance with applicable state and federal environmental/safety regulations and the terms and conditions of the SCA.

Throughout CGS's operating life, the plant has maintained an excellent record of compliance with state environmental and safety regulations and SCA requirements. Plant management and staff have always been very responsive in addressing any concerns, and this cooperative partnership has resulted in such matters being satisfactorily resolved. At this time, CGS has no outstanding environmental issues and is considered to be in full compliance with license and permit conditions.

The Council has reviewed the environmental and safety portions of CGS's license renewal application and finds that the impacts associated with extending plant operations are adequately addressed. Three areas of ongoing interest were identified – wastewater discharge under the National Pollutant Discharge Elimination System (NPDES) permit; groundwater discharges; and storage of spent reactor fuel on-site (dry cask storage). These areas are key components of our compliance monitoring program and will continue to receive our full attention throughout the relicensing process.

At an appropriate time in the future, the Council expects to process an amendment to the CGS SCA that will update the plant's licensing requirements should the period of operation be extended to 2043. NRC's licensing decision will be a key component of that review.

The Council wishes to note that Energy Northwest has provided several briefings and routinely reports on the status of the relicensing effort. We also acknowledge that NRC has been in contact with several state agencies with knowledge of CGS activities and received their input as part of your initial scoping review.

The Council appreciates the opportunity to participate in this relicensing process as the Columbia Generating Station is an integral

D-1-PRO, continued

## D-2-OTH

D-3-PRO

Mr. Michael T. Lesar April 6, 2010 Page 3 of 3

part of the region's power system and a license extension will ensure that the power from CGS is available to future generations.

D-3-PRO,

continued

Thank you for your continued cooperation.

Sincerely,

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James O. Luce Chair



# FRANKLIN COUNTY

BRAD PECK DISTRICT 1 BRAD PECK DISTRICT 2

RICK MILLER DISTRICT 3

Fred H. Bowen County Administrator Rosie H. Rumsey Human Resources Director

April 7, 2010

Michael T. Lesar Chief, Rulemaking and Directives Branch Office of Administration Mailstop TWB 05-BOIM U.S. Nuclear Regulatory Commission Washington, D.C. 20555-001 3/11 AND RECEIVED 75FR 11572 FECEIVED

Dear Mr. Lesar:

As the duly elected Franklin County Board of Commissioners, we are pleased to support Energy Northwest's Columbia Generating Station license renewal application to E-1-PRO the Nuclear Regulatory Commission. Plot Millor, Cheinnan Pro Teen We recognize the valuable role Columbia plays in our regional supply of safe, affordable E-2-GHG and reliable carbon-free energy. Bred Pech, Chainsan Moreover, many of our citizens enjoy stable, professional working careers at Energy Northwest. Those jobs provide significant economic benefit to our county in addition to E-3-SOC the annual power generation taxes you pay that flow back to our schools, fire departments, libraries and other local services. In addition to our strong support of your license renewal application, we urge you to E-4-ALT consider developing additional nuclear power generating facilities in or near Franklin County.

Sincerely,

#### BOARD OF COUNTY COMMISSIONERS FRANKLIN COUNTY, WASHINGTON

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Brad Peck, Chairman

and Sable carbon-free energy.

Rick Miller, Chairman Pro Tem

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cc: J.V. Parrish, Chief Executive Officer, Energy Northwest

1016 North 4<sup>th</sup> Avenue. Pasco. Washington 99301-3706 | Phone (509) 545-3535 | Fax (509) 545-3573 | web site www.co.franklin.wa.us Tem plate = ADH - 013



- 27 -

Olympia Office: 412 Legislative Building PO Box 40435 Olympia, WA 98504-0435 (360) 786-7668 FAX: (360) 786-1323 e-mail: sheldon.timothy@leg.wa.gov

## Washington State Senate

#### Senator Tim Sheldon

35th Legislative District

Residence: Potlatch PO Box 474 Hoodsport, WA 98548 Phone: (360) 877-5768

April 9, 2010

Michael T. Lesar Chief, Rulemaking and Directives Branch Office of Administration Mailstop TWB 05-BOIM U. S. Regulatory Commission Washington, D.C. 20555-001

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F-1-GHG

F-2-SOC

RE: Renewal of the operating license for the Columbia Generating Station

Dear Mr. Lesar:

I strongly support the relicensing of the Columbia Generating Station.

The relicensing of CGS will play a crucial role in helping the region meet the growing demand for carbon-free power. According to the Bonneville Power Administration, replacing the power output of CGS with market purchases generated by fossil fuels would increase the carbon emissions of the Federal Columbia River Power System by about 3.7 million metric tons a year. CGS is also vital to a reliable and stable regional power system. The firm power from CGS complements variable hydroelectric and wind power.

In addition to providing the region with safe, cost-effective carbon-free power, CGS is a major source of economic stability in Washington's Tri-Cities. CGS employs a large work force, it provides significant tax revenues, and it lends support to local charitable organizations.

For these reasons, the relicensing of CGS has my strong support.

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Sincerely, Tim Shedon

Senator Tim Sheldon

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Confederated Tribes and Bands of the Yakama Nation Established by the Treaty of June 9, 1855

April 9, 2010

The Honorable Gregory B. Jaczko Chairman U.S. Nuclear Regulatory Commission Mail Stop 0-16G4 Washington D.C. 20555-0001

Dear Chairman Jaczko:

I am writing to urge the Nuclear Regulatory Commission to strengthen efforts to ensure the safe and secure storage of spent power reactor fuel at the Columbia Generating Station (CGS) located on the U.S. Department of Energy's Hanford site. In light of the decision by President Obama to cancel the Yucca Mountain nuclear waste repository, the timely disposal of spent power reactor fuel can no longer be assumed. Instead there is a growing likelihood that spent power reactor fuel will accumulate and remain at reactor sites for an indefinite period.

In particular, we urge the NRC to end its policy of allowing dense compaction of spent fuel in pools and require highly radioactive fuel assemblies greater than five years old be placed into dry, hardened storage modes capable of withstanding aerial impacts, earthquakes and acts of malice.

The Hanford site is located on land to which the Yakama Nation has perpetual rights under the Treaty of June 9, 1855. The Federal government maintains a special trust relationship with Indian tribes pursuant to treaties, statutes, Executive Orders, judicial decisions and other legal instruments. Inherent in this relationship is an enforceable fiduciary responsibility to the Yakama Nation to protect its lands and resources. Moreover, the Yakama Reservation is within the 50-mile Ingestion Pathway Zone if a major radiological release were to occur at the Columbia Generating Station.

As you may know, the CGS is a Boiling Water Reactor Mark II that began operation in 1984. It is in the early process of extending its operating license, which expires in December 2023. This reactor has generated approximately 500 metric tons of spent fuel. Over the next several decades the radioactive inventory in spent fuel at the Columbia Generating Station is estimated to more than quadruple. The major preponderance of spent fuel at the CGS is densely compacted in an above ground pool, well above grade. On average, spent fuel ponds hold five to 10 times more long-lived radioactivity than a reactor core. Particularly worrisome is the large amount of cesium 137 in fuel ponds, which contain anywhere from 20 to 50 million curies of this dangerous isotope.

For the past several years, the NRC has sponsored research which indicated that consequences from drainage of spent fuel pools from accidents and earthquakes could be considerable. For instance, a 1997 report for the NRC by Brookhaven National Laboratory found that a severe pool fire could render about 188 square miles uninhabitable, cause as many as 28,000 cancer

Post Office Box 151, Fort Road, Toppenish, WA 98948 (509) 865-5121

## G-1-WST

The Honorable Gregory B. Jaczko April 9, 2010 Page 2

fatalities, and cost \$59 billion in damage. But, the frequency of these events was considered to be quite small.

In 2002, Attorneys General from states hosting most of the nation's nuclear power plants called upon the U.S. Congress to pass legislation to "enhance protections for one of the most vulnerable components of a nuclear power plant –its spent fuel pools."

In 2003 an independent study reported that drainage of a spent fuel pool by a terrorist attack could result in as much as 27,000 square miles of severe land contamination. This was the first study to consider potential risks of terrorist attacks on spent fuel pools.

In response, the U.S. Congress requested the National Academy of Sciences to convene a special panel to address this concern. In 2005 the Academy panel warned that, "...under some conditions, a terrorist attack that partially or completely drained a spent fuel pool could lead to a propagating zirconium cladding fire and the release of large quantities of radioactive materials to the environment." The panel also noted that, "pools are potentially susceptible to attacks from above or from the sides depending on their elevation with respect to grade and the presence of surrounding shielding structures." Because of the sensitivity of the subject, the panel submitted classified findings and recommendations to the NRC.

The Academy panel also visited German nuclear sites, where spent fuel pools are under heavy containment or stored in dry casks, which are placed in earthen berms or thick-wall structures. The German nuclear industry took these steps 25 years ago in response to fighter jet crashes and concerns over acts of terror.

We note that the NRC is working on a new "waste confidence" policy. We urge that this new policy not be contingent on the timely opening of a high-level waste repository, but rather on the safety and security of spent fuel storage, which may unfortunately, extend into the indefinite future. Specifically, we urge that license extensions being sought, including that for the Columbia Generating Station be contingent on emplacement of spent fuel greater than five years of age, in dry, hardened storage. Future reactors should be required to have spent fuel pools under heavy containment.

I look forward to your response.

Sincerely

Russell Jim. Manager Environmental Restoration and Waste Management Program

cc. Energy Northwest Board of Directors

Yakama Nation Radioactive and Hazardous Waste Committee Philip Rigdon, Deputy Director, Yakama Nation Department of Natural Resources G-1-WST, continued

	State of Washington House of Representatives			
April 12, 2010	3/11/2010	RECEIV	200 APR 1.9 PM	RULES AND DIPEC
Rulemaking and Directives Branch Office of Administration Mailstop TWB 05-B01M U. S. Regulatory Commission Washington, D. C. 20555-0001	75 F.K. 115 72)		2: 39	TIVES

#### SUBJECT: Support for License Renewal of the Columbia Generating Station **Operated by Energy Northwest**

- 30 -

We are pleased to support Energy Northwest's request to the NRC to renew the operating license of the Columbia Generating Station, Washington State's only commercial nuclear generating project.

Columbia has been a valuable energy resource in the region for more than 25 years. It provides reliable, clean, safe and low cost electricity to the region's ratepayers. In addition to the Columbia Generating Station, the State of Washington is fortunate to have a mix of other energy resources such as hydropower, wind and solar. However, the continued operation of Columbia will ensure we can meet our region's growing energy demands while helping the State of Washington in its economic recovery.

The ongoing operation of this generating resource is vital to the citizens of the region and will guarantee that a reliable, low cost and diversified source of power is available to provide a base-load source of power for our businesses and ratepayers.

Thank you for your consideration.

Sincerely, Larry Haler

State Representative 8th Legislative District

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Brad Klippert

State Representative 8th Legislative District

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## Washington State Senate

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April 12, 2010

Michael T. Lesar, Chief Rulemaking and Directives Branch Office of Administration Mailstop TWB 05-BO1M U. S. Regulatory Commission Washington, D. C. 20555-0001

### SUBJECT: SUPPORT FOR LICENSE RENEWAL OF THE COLUMBIA GENERATING STATION OPERATED BY ENERGY NORTHWEST

Dear Mr. Lesar,

We are pleased to support Energy Northwest's request to the Nuclear Regulatory Commission to renew the operating license of the Columbia Generating Station, Washington State's only commercial nuclear generating project.

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Columbia has been a valuable energy resource in the region for more than 25 years. It provides reliable, clean, safe and low cost electricity to the region's ratepayers. In addition to the Columbia Generating Station, the state of Washington is fortunate to have a mix of other energy resources such as hydropower, wind and solar. However, the continued operation of Columbia will ensure we can meet our region's growing energy demands while helping the State of Washington in its economic recovery.

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The ongoing operation of this generating resource is vital to the citizens of the region and will guarantee that a reliable, low cost and diversified source of power is available to provide a baseload source of power for our businesses and ratepayers.

I-1-PRO, continued

Cordially, the following members of the Washington State Senate:

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## Washington State Senate Senator Phil Rockefeller

23rd Legislative District

3/11/20/0

PO Box 40423 Olympia, WA 98504-0423 (360) 786-7644 E-mail: Rockefeller.Phi.@leg.wa.gov

April 19, 2010

TTY: 1-800-635-9993 Toll Free Hotline: 1-800-562-6000 FAX: (360) 786-7450

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Michael T. Lesar, Chief Rulemaking and Directives Branch Office of Administration Mailstop TWB 05-BOIM U. S. Regulatory Commission Washington, D.C. 20555-001

Dear Mr. Lesar:

I want to add my voice to those strongly supporting relicensing of Columbia Generating Station (CGS) as an essential asset in Washington's energy resources. Since the nuclear plant received its original 40-year license in 1983, it has demonstrated its value as an important source of energy free of greenhouse gas emissions. I view Energy Northwest's planned request to renew the license for another 20 years as an essential step in extending upon that value, which is likely to grow as the demand for carbon-free power increases.

CGS provides some of the region's most cost-effective carbon-free power, making it essential to state, regional and national goals of reducing carbon emissions that contribute to climate change. The Bonneville Power Administration estimated that replacing CGS power with market purchases generated by fossil fuels would increase the carbon emissions of the Federal Columbia River Power System by about 3.7 million metric tons a year. We must retain this power source not only to avoid such emissions, but also because of its vital contribution to a reliable, stable regional power system. In addition, the firm power from CGS also complements more variable, renewable hydroelectric power.

CGS is a valuable resource, and its importance will no doubt increase well into the future. Energy Northwest's efforts to improve plant performance over the coming years will further support its relicensing application, which I strongly endorse. Thank you for your consideration. J-2-PRO

J-1-GHG

Sincerely, Chil Rockefeller

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Senator Phil Rockefeller Chairman Senate Committee on Environment, Water, & Energy SUUSI Review Complete

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Committees: Environment, Water & Energy, Chair • Joint Committee on Energy Supply & Energy Conservation, Chair • Ways & Means Joint Legislative Audit & Review Committee, Chair



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DEPARTMENT OF HEALTH OFFICE OF RADIATION PROTECTION 111 Israel Road SE • PO Box 47827 • Olympia, Washington 98504-7827 TDD Relay Services: 1-800-833-6388

STATE OF WASHINGTON

May 14, 2010

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

3/11/2210 75 FR 11572

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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Michael T. Lesar, Chief Page 2 of 3

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

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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. USDOF 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.

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Michael T. Lesar, Chief Page 3 of 3

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

Sincerely,

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Gary Ro Director obertson

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

24 1 a second. Okay. If you could introduce yourself 2 3 first? MR. REVELL: I'm Ed Revell. Mayor Pro Tem 4 5 for the City of Richland. 6 And these are just more curiosity questions. What was the design life of the Columbia 7 L-1-00S Generating Station and will you all be doing any 8 special materials testing so you can evaluate certain 9 kinds of equipment before you decide to go forward? 10 11 MR. RAKOVAN: Who wants to take care of this, Louise? 12 MS. LUND: I can do that. 13 MR. RAKOVAN: Okay. 14 MS. LUND: As far as the 40 years, and we 15 get asked this a lot, that really was established 16 17 because of antitrust regulations. So it's not a 18 design life specific to 40 years. And there's 19 analyses that are done for the equipment. Okay. And some of them are the analyses that were done for 40 20 years and have to be extended past the 40 year time 21 22 frame, they're called time limited aging analyses. So 23 that's what part of the work that we do is looking at the analyses and the reviews that have been done. 24 25 In essence, on the safety side it's about NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrorcss.com

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making sure aging management programs that we feel are sufficiently robust are put into place.

Do we have the GALL document back there, does anybody know? Okay.

We have what we call a lessons learned 5 6 document through many years of looking at license 7 renewal applications and also doing a lot of research and looking at a lot of the information that's 8 available about the performance of the components that 9 are in the plant. We have put together a document 10 11 that says for certain components and certain 12 environments we feel that these are good aging management programs. If the plant chooses not to use 13 those programs, they have to show that the program 14 that they're going to put into place is comparable. 15 That's a lot of what we evaluate in the safety review. 16

17 Now the programs have components like how 18 often they have to inspect, what the acceptance criteria is, you know, and a lot these programs are in 19 place even before the period of extended operation. 20 But as the plant gets older, as you can imagine, you 21 22 would want to inspect more. You know, there's a lot 23 of things that you put into place, much like you would with your car as far as the aging management you would 24 do for your vehicle or for your house or for anything 25

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26 1 else. You now, the older it gets the more often you 2 look. Now when a plant is planning to go into 3 license renewal a lot of times they replace a lot of 4 the components in the plant and there's certain ones 5 6 that get replaced on a regular basis anyway. So anyway this is all the things that they take into 7 account when they're putting together 8 their 9 application. I hope that answers your question. 10 And 11 did I get the second one, I couldn't remember what the second one was? 12 MR. REVELL: Materials testing? 13 MS. LUND: Right. 14 MR. REVELL: But I think you kind of 15 16 covered it. 17 MS. LUND: Right. Right. It's basically 18 through the inspection and also we have a lot of 19 information that we do. We do confirmatory work through our Office of Research Loo, and the sorts of 20 materials and environments that have all played into 21 22 the guidance documents that we have produced. This is 23 one of the areas where we have a lot of guidance out there to the plants in what we consider acceptable. 24 25 MR. REVELL: Thank You. NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrorcss.com

27 MR. RAKOVAN: Thanks Louise. 1 2 Any other questions on the environmental 3 scoping process or the license renewal process at this time? 4 Okay. We've got a hand in the back. 5 6 If you could introduce yourself please? MR. PECK: Brad Peck, Franklin County 7 8 Commissioner. Will the 9 EIS process take into consideration the negative consequences for M-1-00S 10 the 11 region's power supply if the plant is not relicensed? MR. RAKOVAN: Jeff, can you take the front 12 mic if you would? 13 MR. RIKHOFF: My name is Jeff Rikhoff. 14 The need for power is not addressed in 15 license renewal. Our regulations prevent us from 16 17 addressing those issues. Primarily because these 18 decisions are made by state and local agencies as well 19 as the applicant licensee as to whether they want to operate or not. Whether it's economically feasible to 20 operate or not. 21 22 I don't know if that answers your 23 question. MR. PECK: I think it answers the question 24 M-2-ALT 25 that the basis of it was that the EIS process is to NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

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28 1 consider the environmental impacts on humans of the 2 proposed action. And I'm surprised to hear that the 3 no action alternative, which is required under NEPA, M-2-ALT, continued would have a negative consequence for the region but 4 that wouldn't be considered. But you have answered 5 6 the question. Thank you. MR. RIKHOFF: Well in alternative centered 7 8 no action we address not licensing or not extending the license to the plant, but the issue of the impact 9 on the power base we don't address directly. 10 11 MR. DRICK: I think you're asking does the EIS --12 MR. RAKOVAN: Could you introduce 13 yourself, Victor? 14 MR. DRICK: I'm the Public Affairs Officer 15 for the NRC in Region IV. 16 17 I think you're asking does the EIS address 18 the economic impact to the area if the license is not extended? Was that what your question was, what the 19 economic impact on the area would be? 20 MR. PECK: That would be one slice of the 21 22 broader question. MR. DRICK: They do look at that. 23 MR. PECK: Okay. So again, that's just 24 M-3-ALT There are other various negative, I 25 one slice. NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrorcss.com

29 1 believe, impacts on local communities --MR. DRICK: That's looked at. 2 MR. PECK: -- if it's not relicensed. 3 M-3-ALT, MR. DRICK: Yes. Those things are looked 4 continued 5 at as part of the review. 6 MR. PECK: Okay. So that I would have expected. That would be included in the EIS? 7 MR. DRICK. Yes. What he was saying was 8 we don't look at what the community would do to 9 replace the power if the plant is not relicensed. But 10 11 we look at the issues that you're concerned about, 12 certainly. MR. PECK: Okay. Thanks. 13 MR. RAKOVAN: Thanks Victor. That's 14 Victor Drick from our Region IV Office near Dallas. 15 Any other questions at this time? 16 17 Okay. What I'm going to do then is to go 18 ahead and go with the yellow cards that I have of 19 people who have signed up to speak. I'm going to go ahead and just let you know the order, I've only got 20 four cards at this point. So once I call you up, if 21 22 you could come up, I will basically hand the floor over to you. Again, if you could introduce yourself 23 just to make sure we have the right person. 24 25 I'm going to start with Ed Revell from the NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrorcss.com

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30 1 city of Richland. Then I'm going to go to Steve Lee. And third to Robert Link. 2 MR. REVELL: I'm Ed Revell from the city 3 of Richland. I'm Mayor Pro Tem on the City Council. 4 I have just a couple of comments, it won't 5 6 take much more than a minute or two. During the initial start up period in the 7 mid to late 1980s there was a few community concerns 8 regarding the long term viability of the Columbia 9 Generating Station. They had mostly to do with 10 11 reliability, I don't think there was every really a safety concern. But within a few years of those 12 issues, those issues were resolved and the Columbia 13 Generating Station has demonstrated for the past 15 or 14 so years, maybe 18 I'm not sure what the timeline is, 15 but I know for quite a while now they've had a very 16 17 good performance rating. And have been very reliable 18 as well. 19 There's every reason for us to believe that with the extended life of the Columbia Generating 20 Station that it will continue to be a safe and 21 22 reliable base load resource for the Pacific Northwest. 23 We have an excellent community for Energy Northwest and a nuclear power presence. This is a pronuclear 24 community because most of our people are scientific 25 NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrorcss.com

L-2-PRO

31 1 people. A lot of research is done here and a lot of people understand the risks involved and 2 the L-2-PRO, continued technology involved in and are actually very 3 comfortable with it. 4 And just recently, and this is kind of 5 6 encouraging, just recently our Governor has made public statements in favor of looking at the nuclear 7 L-3-ALT option here for the state. So I would say the state 8 is opening up a little and will be a little more 9 receptive as we look into the future. 10 11 I think Energy Northwest and Columbia Generating Station has been a good corporate citizen L-4-PRO 12 in our community and is a very welcomed neighbor. 13 The only concern that I have that's worth 14 mentioning is where it involves the ultimate disposal 15 of spent nuclear fuel. The community has got concerns 16 17 on how long storage of spent nuclear fuel will be 18 handled by the Department of Energy. I know that's 19 outside the control of NRC and Columbia Generating L-5-WST Station or Energy Northwest. But it is an issue that 20 needs to be addressed because, you know, 21 the 22 administration's trying to shutdown Yucca Mountain. 23 However, this community is very used to working with nuclear materials. I know the storage containers that 24 the fuel is in really would allow that fuel to be 25 NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrorcss.com

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32 1 stored for a long time on-site but that's not really the contract so to speak, that the utilities had with 2 the Federal Government. And I don't know if you'll be 3 addressing that or not in your review. And I don't 4 L-5-WST, continued see it as a show stopper for us here because we are, 5 6 as I said, a nuclear community. And we have the capability to do long term storage here but it's not 7 something we're really looking forward to. 8 And so in summary I'll say the City of 9 Richland does support this relicensing effort to 10 L-6-PRO 11 extend the operating life of the Columbia Generating Station by 20 years. 12 Thank you. 13 MR. RAKOVAN: Thank you, sir. 14 15 Let's go ahead and go to Steve Lee followed by Bob Link and then Lori Sanders. 16 17 MR. LEE: Good afternoon. I'm Steve Lee 18 and I'm with the Pasco Chamber of Commerce. The Pasco Chamber represents some 400 local businesses in our 19 And I know we joined the other chambers and 20 area. N-1-SOC collective business in the Tri-City's area in saying 21 22 it's absolutely essential that Columbia Generating Station continue providing safe, clean and low cost 23 power for our community and our surrounding area which 24 drives the strong economy. 25 NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrorcss.com

33 I'm with that on behalf of Pasco 1 2 businesses that Columbia Generating Station has given 3 our community much more than just electricity. Columbia offers full time employment for many of our 4 residents, not to mention significant tax revenues to 5 N-1-SOC, 6 local and state governments. Relicensing this plant continued will also capture extended benefits in terms of a 7 regional invest, which we measure in both direct and 8 indirect economic impact which extends well beyond the 9 Pasco city limits. 10 11 We also live in an environmentally conscious time and Columbia Generating Station's 12 benign impact on the environment through safe and 13 N-2-GHG clean carbon-free power generation speaks to the 14 plants leading role as a steward of our natural 15 resources. 16 17 The Pasco Chamber of Congress is confident 18 that the Columbia Generating Station with the Nuclear Regulatory Commission's approval will continue to be a 19 N-3-SOC safe and reliable source of economic strength for our 20 community for many years to come. 21 22 Thank you. 23 MR. RAKOVAN: Okay. Let's go to Bob Link and then Lori Sanders. 24 25 MR. LINK: Good afternoon and thank you O-1-PRO NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrorcss.com

34 1 for the opportunity. I'm Bob Link. I'm manager of Environmental Health Safety and Licensing for Areva, a 2 nuclear fuel fabrication facility located on the north 3 side of Richland, Washington. I'm also a member of 4 the Board of Directors for the Tri-City Development 5 0-1-PRO. 6 Council, called TRIDEC, the regional economic continued development of our organization. And I also am a 7 resident of Franklin County and I reside literally on 8 the river just south of the plant about 12 miles. So 9 I have a variety of different perspectives to look at 10 11 this action by the NRC. The Columbia Generating Station represents 12 an important environmental asset to the Northwest 13 region of the United States as it generates critical 14 15 electrical energy for our economy without any CO2 emissions. If the license is not renewed, I can 16 17 guarantee you the replacement source, even if it is O-2-GHG 18 not CO2 emitting, would consume precious resources in its construction and add to the global environmental 19 footprint. These impacts on the environment will be 20 deferred by allowing this well operated offset to 21 22 continue to serve the community well into the future. 23 Having just completed a renewal of the AREVA's NRC license to operate, I'm familiar with the 24 0-3-PRO dedication and scrutiny that the NRC and other 25 NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrorcss.com

35 1 stakeholders perform in such a process. I'm confident that your findings will conclude that from an 2 environmental perspective, Energy 3 Northwest 0-3-PRO. application in balance is a responsible means to 4 continued economically continue to serve the Northwest region 5 while having minimal impact on the environment. 6 In fact, it's renewal and continued use of 7 critical installed infrastructures such 8 as O-4-PRO transmission lines and minimal water use consumption 9 for its benefit represents an environmental asset to 10 11 the region. Northwest 12 Energy has demonstrated themselves to be good stewards of their mission and 13 assets with the sensitivity to the environment as a 14 high level of performance. They have continued to 15 seek input from a wide variety of interested parties 16 17 and are dedicated to sustainable development in their 18 operations. Their continued safety record and O-5-PRO 19 operation of the Columbia Generating Station speaks to their commitment to assure the workers, public, and 20 environment will not be harmed by the renewal of this 21 22 license. 23 I strongly urge the renewal of the operating license by the NRC as in the best overall 24 interest of the environment and the economy of the 25 NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrorcss.com

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1	region.	C-5-PRO,
2	Thank you.	continued
3	MR. RAKOVAN: Okay. The last card that I	
4	have is Lori Sanders.	
5	MS. SANDERS: I'm Lori Sanders. I'm a	
6	Commissioner for Benton PUD and also on the Board of	
7	Directors for Energy Northwest.	
8	And I would just like to note, I	
9	understand Mr. Peck's comment on environmental issues	
10	not being concerned and I really think what he's	
11	trying to capture is just to point out that we are a	
12	unique community. We're probably the envy of most	
13	communities across the United States because we	
14	already have 97 percent of our power is carbon-free.	
15	And the majority of that is coming from Bonneville	
16	Power System and Columbia Generating Station is 10	
17	percent of that system. So it's really an important	
18	part of keeping our resources, not necessarily	
19	renewable maybe, but as carbon-free as possible.	] ]
20	And we're all going to see a lot of	
21	additional wind power being put up and already it just	
22	amazes me how much we have and it's becoming more and	
23	more difficult to balance that. It's unreliable, you	P-2-ALT
24	can't make the wind blow, and we use our hydro system	
25	to balance it. And although the nuclear plant doesn't	
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37 1 balance the wind in itself, it allows more flexibility 2 of the hydro system to do so. And those items cught 3 to be considered when you're looking at the environmental impact of this plant. It isn't just the 4 P-2-ALT, long term storage. It isn't just the construction of 5 continued 6 a plant. It's what do you do if you don't have it? 7 And I think that's really what Mr. Peck was trying to 8 say and I really think it ought to be considered. 9 But Columbia Generating Station has been a 10 11 good neighbor. I believe Mr. Revell also stated it very well, "We are friendly to the plant as far as the 12 community is concerned, supportive of the plant." And 13 P-3-PRO really we'd like to see it continue on for another 14 additional 20 years or even 40. 15 Thank you very much. 16 17 MR. RAKOVAN: Okay. That's the end of the 18 cards that I had of people who signed up before the meeting to speak. I wanted to just see before we go 19 ahead and close to see if there's anyone who wishes to 20 have a chance at the microphone to provide us with 21 22 some environmental scoping comments? 23 Now again, don't forget you'll have time after today's meeting. Of course you can come back 24 for tonight's meeting or you can send in your 25 NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrorcss.com

23 1 to Ed Harrington and Dan Jordheim. So Alvin please? 2 MR. ANKRUM: Thank you, Lance. 3 As you mentioned my name is Al. 4 And I 5 work at Pacific Northwest National Laboratory. Ι 6 would just like to submit a statement in favor of renewing the operating license for Columbia Generating 7 Q-1-PRO Station. They've been a conscientious neighbor and a 8 good resident of this community supplying reliable 9 electricity. And a good employer. And at the heart of 10 11 the foundation for the economic well being as this 12 community. Thank you. 13 MR. RAKOVAN: Okay. Let's move on to Ed 14 Harrington please. Then Dan Jordheim and Gene Kinsey. 15 MR. HARRINGTON: Well I didn't really know 16 17 what the content of this meeting was going to be but 18 I've got four years of my professional life invested in that plant. And I have a tendency to be a little 19 protective of it. 20 R-1-PRO I didn't build it to last just 40 years, 21 22 our intent was to put up an absolute perfect plant in every step of the way. And we think we turned out a 23 good product. 24 25 And I'm sure that you'll continue to give NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrorcss.com

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24 1 us a good investigation before you relicense it, we encourage that. But just believe that it was a great 2 R-1-PRO, plant when we built it. 3 continued 4 Thank you. 5 MR. RAKOVAN: Okay. Dan? MR. JORDHEIM: I'm Dan Jordheim. 6 As a Tri-City's resident one of the things 7 I love to brag about to people from out of state is 8 that my power company, that delivers power to my 9 house, tells me that 95 percent of the power delivered 10 11 to my house comes from non-green house gas, non-global warming sources. And that's something we're proud of S-1-GHG 12 and I'd like to see continue. Ten percent of that 13 comes from the Columbia Generating Station, so it 14 seems appropriate to me that the Environmental Impact 15 Statement's side of this incorporates some positive 16 17 aspects of the non-global greenhouse gas side of it. 18 The other part, just to comment on my part, Columbia's about 20 miles that way and my house 19 is about five miles that way. Which means that where 20 my daughter lays her head to sleep each night is 25 or 21 S-2-PRO 22 30 miles from the Columbia plant. And the people that 23 operate this plant have shown me for some two or three decades now that I can trust them with my daughter's 24 25 life. NEAL R. GROSS

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25 Thank you. 1 MR. RAKOVAN: Okay. The last yellow card 2 3 that I have is for Gene Kinsey. MR. KINSEY: I'm Gene Kinsey. Can you 4 5 hear me? 6 I was a welder at this plant years ago 7 when they were building it. I've got to be able to see who I'm talking 8 9 to. Okay. So if you don't mind I'm going to 10 11 read a statement that I -- and anybody, you know, if you want to ask me questions about it later on to, 12 your welcome. But here's what I wrote, I says: In my 13 view of this event, I can truly say that the license 14 renewal and continued operation of the Energy 15 Northwest facility is reasonable to expect. I am not 16 T-1-ALT 17 only in favor of the license renewal, I believe that 18 it would be prudent to add other nuclear plants on 19 this 500 plus square miles of the Hanford Nuclear Reservation. 20 In the nuclear energy field, we as a 21 22 nation have only scratched the surface of using this T-2-PRO 23 energy to provide a larger and more useful source for public use. When you realize that a pellet, a little 24 larger than the eraser an the end of a pencil, has the 25 NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrorcss.com

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ultimate energy of a ton of coal. If this little pellet is recycled to its fullest energy content, the unusable residue would fit on the head of a straight pin.

Somewhere in our future the truth will 5 6 emerge regarding this powerful energy resource. Τn 7 the early days of electrical energy, there was strong resistance to its use. Electrocution by accident or 8 on purpose created a huge fear factor. We know today 9 that electrical energy in the hands of professional 10 11 and responsible people, like those at Energy Northwest I could say, can create wonders today that people in 12 our nation's early history vaguely dreamed of. 13

The future of our country abounds with 14 opportunities in the nuclear industry. Nuclear energy 15 can be the door opener for hydrogen as fuel. Too many 16 17 times the political influence, environmental concerns, 18 and financial history have been twisted and used to 19 slow the progress towards putting this energy source into action. With nuclear power the coal mines and 20 oil wells of tomorrow can come from the air we breathe 21 22 and the water we drink. If you do not believe this 23 look up, Fischer-Tropsch Synthesis, and I'd encourage you to look at that and talk to a real scientist about 24 25 that process.

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T-2-PRO, continued

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27 1 My life is proof that a person can live, 2 work, and retire healthy in the nuclear industry. 3 This is not to say that mistakes have not been made T-2-PRO. continued but Energy Northwest and others should abound with a 4 bright future on the Hanford Nuclear Reservation. 5 Thank you for listening. 6 MR. RAKOVAN: Okay. I'd like to offer up 7 8 the microphone to anyone here who has -- please, of you would, if you could let us know who you are and 9 who you're with? And if you'd like you can come up 10 11 and use this microphone, it's much easier for addressing the crowd. 12 MS. MATHEWS: Hi. 13 My name is Carrie Mathews and I work at Pacific Northwest National 14 15 Laboratory. And I just wanted to pointed kind of a 16 17 unique situation in the Tri-City that may not exist in 18 other places with nuclear plants. And that situation is that we have a laboratory, which is pursuing 19 U-1-PRO research and development and projects which improve 20 non-filtration and nuclear security around the world. 21 22 And we also have AREVA's fuel fabrication plant, 23 which is producing nuclear fuel for boiling water reactors. 24 And the nexus of these three facilities 25 NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrorcss.com

28 1 and capabilities creates an unique opportunity for us 2 to reach out to states around the world who are going 3 to introduce nuclear power and there are a lot of them in regions of a somewhat sense of instability and 4 5 insecurity. And so we really need to be engaging them 6 to help them do it right and learn from the mistakes that have been made people with a lot of experience. 7 So I'm going to say that Energy Northwest 8 has been extremely helpful in opening their plant for 9 tours and providing lectures and assisting in the 10 11 outreach to countries that are going to introduce nuclear power, to help them learn how to operate them 12 safely and securely and to safeguard nuclear material. 13 So I am just very supportive of the plant 14 and the people that work there and the regulatory 15 process and I'm encouraging, you know, that we move 16 17 this forward. 18 So thanks for your attention. MR. RAKOVAN: Anyone else like sometime at 19 the microphone tonight? 20 Okay. I will go ahead and turn it over to 21 22 Louise then to close out the meeting. 23 MS. LUND: I'd like to thank everybody for coming to our meeting tonight. 24 And, you know, I just wanted to mention 25 NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrorcss.com

U-1-PRO, continued

Gene & Anne Kinsey 4904 West Canal Drive Kennewick, WA 99336-1407

RE: Nuclear Regulatory Commission Energy Northwest / License Renewal Richland Public Library 1:30pm and 6pm Tuesday April 6, 2010

In my view of this event, I can truly say that the license renewal and continued operation of the Energy Northwest nuclear facility is reasonable to expect. I am not only in favor of license renewal. I believe that it would be prudent to add other nuclear plants on the 500 plus square miles of the Hanford Nuclear Reservation.

In the nuclear energy field, we as a nation have only scratched the surface of using this energy to provide a larger and more useful source for public use. When you realize that a pellet a little larger than the eraser on the end of a pencil has the ultimate energy that compares to a ton of coal. If this pellet is recycled to its fullest energy content the unusable residue would fit on the head of a straight pin.

Somewhere in our future the truth will emerge regarding this powerful energy resource. In the early days of electrical energy, there was strong resistance to its use. Electrocution by accident or on purpose created a huge fear factor. We know today that electrical energy in the hands of professional responsible people can create wonders today that people in our nations early history vaguely dreamed of.

The future of our country abounds with opportunities in the nuclear industry. Nuclear energy can be the door opener to hydrogen as fuel. To many times political influence, environmental concerns, and financial history have been twisted and used to slow progress toward putting this energy source into action. With nuclear power the coal mines and oil wells of tomorrow can come from the air we breathe and the water we drink. If you do not believe this look up Fischer Tropsch Synthesis and talk to a real scientist about that process.

My life is proof that a person can live, work, and retire healthy in the nuclear industry. This is not to say that mistakes have not been made. But with understanding, and care, and education with reality in focus, Energy Northwest and others should abound with a bright future on the Hanford Nuclear Reservation. Thank you for listening.

I am Gene Kinsey, a retired Hanford worker.

(Please note: These written comments were also captured orally in the evening meeting transcript with the same comment identifier codes)

T-1-ALT

T-2-PRO



#### UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001

October 1, 2010

LICENSEE:	Energy	Northwest
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FACILITY: Columbia Generating Station

SUBJECT: SUMMARY OF TRIBAL OUTREACH INFORMATIONAL MEETING CONCERNING COLUMBIA GENERATING STATION LICENSE RENEWAL AND HANFORD LOW-LEVEL WASTE

The U.S. Nuclear Regulatory Commission staff and representatives of several local tribes held an informational meeting on April 27, 2010, to discuss the Columbia Generating Station license renewal application review process and a technical assistance request regarding low-level waste at Hanford. The meeting was useful as an opportunity to discuss some of the tribal representatives' concerns about these issues and also to capture comments as part of the scoping process for the license renewal review.

Enclosure 1 contains a list of the meeting participants. Enclosure 2 is the meeting handout. Enclosure 3 contains the meeting notes.

All tribal participants had an opportunity to comment on this summary.

amb ayle

Daniel I. Doyle, Project Manager Projects Branch 1 Division of License Renewal Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosures: 1. List of Participants 2. Meeting Handout 3. Meeting Notes

cc w/encls: Distribution via Listserv

## U.S. Nuclear Regulatory Commission Washington State Tribal Outreach Informational Meeting Summary

Topics: Columbia Generating Station License Renewal and Hanford Waste

> Richland, Washington April 27, 2010

PARTICIPANTS	AFFILIATION
Bo Pham	U.S. Nuclear Regulatory Commission (NRC)
Daniel Doyle	NRC
Maurice Heath	NRC
Michelle Ryan	NRC
Ronald Cohen	NRC
Bill Maier (via telephone)	NRC
Gregory Suber (via telephone)	NRC
Wade Riggsbee	Yakama Nation
Dave Rowland	Yakama Nation
Brian Barry (via telephone)	Yakama Nation
Stuart Harris	Confederated Tribes of the Umatilla Indian
	Reservation (CTUIR)
Dr. Barbara Harper	CTUIR
Rico Cruz	CTUIR
Rex Buck	Wanapum Band
Alyssa Buck	Wanapum Band
Tara O'Neil	Pacific Northwest National Laboratories (PNNL)
Ellen Kennedy	PNNL
Jerry Yokel	Washington State Department of Ecology

ENCLOSURE 1

## Meeting between NRC and Indian Tribes in the Vicinity of the Hanford Reservation April 27, 2010

- Intergovernmental Liaison
  - o Welcome and Introduction
  - General Comments about NRC
  - o Remarks about Intergovernmental Liaison Branch
  - Meeting Purpose
- Columbia Generating Station license renewal application review: ٠
  - Overall schedule:
    - Jan. 19, 2010 Energy Northwest submitted license renewal application .
    - Mar. 11, 2010 NRC formally accepted license renewal application
    - . May 14, 2010 - Scoping period ends
    - Dec. 15, 2010 Issue Draft Environmental Impact Statement (EIS)
    - .
    - Mar. 7, 2011 Draft EIS comment period ends July 19, 2011 Issue Final Environmental Impact Statement .
    - Nov. 18, 2011 NRC Decision .
  - How to submit comments (deadline is May 14):
    - Chief, Rulemaking and Directives Branch Mail: **Division of Administrative Services** Mailstop TWB-5B01M U.S. Nuclear Regulatory Commission Washington, DC 20555
    - Internet: http://www.regulations.gov (Docket ID: NRC-2010-0029)
  - Additional information about the review:
    - . http://www.nrc.gov/reactors/operating/licensing/renewal/applications /columbia.html
- Low-Level Waste
  - Update regarding Washington State Technical Assistance Request (TAR) and 0 Hanford site

ENCLOSURE 2

#### Meeting Notes:

#### Welcome and Introduction: Michelle Ryan, NRC (Intergovernmental Liaison Branch)

Ms. Ryan opened the meeting with general remarks about the NRC and recognition of the Federal Government's trust responsibility to tribes. Ms. Ryan provided an overview of tribal outreach at the Commission, mentioning efforts made by uranium recovery and current efforts made by the Office of Federal and State Materials and Environmental Management Programs (FSME). To place current Tribal Protocol efforts in context, information regarding its origin was provided, indicating that the Commission information paper and internal protocol were developed after a December 2008 Uranium Recovery briefing. The Intergovernmental Liaison Branch (ILB) at the NRC serves as a liaison to the tribal community. Tribal representatives can contact ILB with general comments or questions related to NRC regulated activities. She also indicated that the ILB staff is not technical, but will be able to assist tribes with finding the proper contact at NRC to handle inquiries of a programmatic or technical nature.

#### Dose Limits at NRC, DOE, and EPA

Dr. Barbara Harper of the Confederated Tribes of the Umatilla Indian Reservation (CTUIR), responded to introductory remarks by asking if she could contact ILB to find out, for example, with whom to speak regarding (DOE Order) 435.1 rulemaking efforts. She stated that NRC dose limits differ from those of the DOE and EPA. She asked which dose limits they should use as the standard.

Greg Suber, NRC, provided information regarding upcoming efforts to implement rules that are complimentary. Part 61 rulemaking at NRC regarding waste classification will seek to rectify the discrepancy. DOE and NRC are in discussion to meet next year regarding the issue.

#### II. Columbia Generating Station License Renewal Application Review Daniel Doyle, NRC (Division of License Renewal)

Mr. Doyle stated that Energy Northwest (EN) has submitted an application to extend the operating license of Columbia Generating Station (CGS) for another 20 years (from 2023 to 2043). He provided an overview of the NRC's License Renewal Application review process which includes two concurrent review paths: one for technical safety issues and the other for determining environmental impacts in accordance with the National Environmental Policy Act (NEPA). The final result of the environmental review is an Environmental Impact Statement (EIS) that includes a recommendation regarding license renewal. He described opportunities for external stakeholder involvement and methods and deadlines for submitting comments.

#### NEPA EIS Templates

The Tribes provided comments to indicate that they all would like to participate in the environmental review process and would like input into the description of the affected environment. The tribal representatives felt that the typical federal government EIS does

Y-1-OTH

ENCLOSURE 3

V-1-00S

-2-		
not adequately address tribal environmental, cultural, and other concerns. The Tribes would like to participate in and improve the process.	}	Y-1-OTH, continued
Dr. Harper would like to provide input to the evaluation of Environmental Justice (EJ).	}	V-2-OTH
Mr. Doyle provided information regarding how comments are provided and considered during the NRC's process. He also continued to describe that the length of a typical review is 22 months. He requested participants to note that the meeting handout provided information on submitting comments and that the deadline for these comments is May 14, 2010.		
<u>Proposed Energy Park</u> Dr. Harper stated that EN has requested to lease 20 square miles of the Hanford Reservation from DOE for an energy park in the future and that Pacific Northwest National Laboratory (PNNL) may be listed as a potential partner in this energy park.	}	V-3-OTH
Mr. Riggsbee, Yakama Nation, asked whether this poses a potential conflict of interest because the NRC is using PNNL as a contractor in the license renewal review.	}	W-1-00S
The NRC staff at the meeting did not have further information regarding the proposed energy park, but indicated that it would consider the potential conflict of interest.		
Hearing Period and Cooperating Agency Status Mr. Maier, NRC, initiated a discussion of the hearing period and cooperating agency status. He referenced the Prairie Island Indian Community and inquired about the parallel between that proceeding and the one for Columbia. Mr. Pham provided some information regarding the hearing process and the unique situation at Prairie Island where the tribe was both a cooperating agency and an intervener in the proceeding.		
Emergency Planning Dave Rowland, Yakama Nation, asked about Emergency Planning and expressed dissatisfaction with the level of interaction between EN and the Yakama Nation.	}	X-1-00S
NRC representatives (Mr. Pham, Mr. Cohen, and Mr. Maier) discussed public meetings and other activities related to emergency planning. Mr. Maier provides preliminary information regarding the next graded exercise, (planned for August 2010) and indicated that he would provide more details about emergency planning via e-mail after the meeting.		
<u>Risk Assessment and Tribal Scenarios</u> Dr. Harper and Mr. Harris initiated a discussion regarding dose assessment. The CTUIR would like a new exposure pathway to be considered in the risk assessment that captures the unique tribal lifestyle including traditional foods and way of life. The CTUIR have a tribal scenario and are interested in performing this analysis for NRC to include in the EIS. The tribal scenario has been developed over the past 16 years. The CTUIR asked if the schedule for issuance of the EIS could be extended to allow time to	}	V-4-OTH

incorporate the tribal scenario. Mr. Pham indicated that information that is new and

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III. Hanford waste and the Washington State Technical Assistance Request (TAR) Maurice Heath, NRC (Low-Level Waste Branch)

Mr. Heath provided an overview of the Washington State TAR for NRC review of US Ecology records from 1965 to 1980. The NRC intends to finish research and provide a report by June 2010. Questions that the review is seeking to answer:

- 1. Does waste fit objectives of Part 61?
- 2. What is the radiological risk to workers' health and safety?

A tribal representative asked about the quality of US Ecology records from 1965-1980. NRC staff indicated that uncertainty would be quantified in risk assessment.

#### Hazardous Materials and Mixed Waste

Mr. Riggsbee raised the issue of hazardous chemicals commingled with radiological waste. He suggested that mercury was dumped at the site. A tribal representative asked who is responsible for mixed waste.

Mr. Heath indicated that this Technical Assistance Request is asking the NRC to evaluate radiological risk. The NRC is responding within the scope of this request and is not evaluating other hazardous chemicals. Mr. Pham explained that the cumulative impact discussion in the EIS for license renewal will seek to disclose relevant information regarding projects in the vicinity of the plant.

Jerry Yokel, Washington State Department of Ecology, described his involvement with the chemical component of the waste.

Dr. Harper made a comment suggesting that DOE is ultimately responsible, since they will be the recipient of waste on the site. Participants discussed the site acceptance criteria and Washington State's role as an agreement state.

Mr. Harris indicated that the tribes would like to be engaged in the process as part of the solution rather than being informed later.

#### License Renewal Schedule revisited

Dr. Harper initiated a discussion regarding the schedule for renewing the license, suggesting that they may need more time if tribal scenarios are to be considered. Mr. Pham discussed the standard timeline is 22 months but indicated that it may vary on a case-by-case basis. Dr. Harper raised the topic of groundwater quality, and asked how that would be evaluated given the known contamination due to the plant's proximity to radiological waste burial grounds. Mr. Cohen responded that wells on the site are monitored as part of the Radiological Emissions Monitoring Program (REMP). V-5-OTH V-6-OTH



#### CTUIR Field Office

Mr. Harris mentioned that the CTUIR were hoping to open a field office near CGS at one point, but changes in security requirements made the building space unavailable. He also indicated that the plant seemed clean and stable and asked for NRC's impression. Mr. Cohen stated that the plant is operated safely.

-4-

Dr. Harper asked whether or not the original environmental analysis had natural resource mitigation. Mr. Doyle responded that this information was discussed in previous Final Environmental Statements which were provided to the tribes in a hard copy as well as electronic version.

List of Tribal Reports Received by the NRC:

1.	2006 Progress Report: Lifestyles and Cultural Practices of Tribal Populations And Risks from Toxic Substances in the Environment. http://cfpub.epa.gov/ncer_abstracts/index.cfm/fuseaction/display.abstractDeta il/abstract/6269/report/2006	<pre>}</pre>	V-8-OTH
2.	Human Scenarios for the Screening Assessment. Columbia River Comprehensive Impact Assessment. Napier, Harper, Lane, Strenge, Spivey. March 1996. U.S. Department of Energy.	}	V-9-OTH

V-7-OTH



P.O. Box 968 Richland, WA 99352-0968

0|11|0010 75 FR 11572 April 21, 2010 000 Es AON Michael T. Lesar 6 Chief, Rulemaking and Directives Branch Office of Administration 10 Mailstop TWB 05–B01M ço U.S. Nuclear Regulatory Commission З Washington, DC 20555-0001 Dear Mr. Lesar, As representatives of public power utilities throughout Washington State, we ardently support Columbia Generating Station's 20-year license renewal application to the Nuclear Regulatory Commission, dated January 19, 2010. We recognize it is in the best interest of our state and all Northwest region ratepayers for the NRC to carefully and fully review and approve this application, thereby continuing Columbia operations through 2043. We can attest that Columbia Generating Station, which delivers at-cost electricity to the Bonneville Power Administration for transmission throughout Washington and other western states, is an exceptionally valuable regional power asset. Historically a very strong operation, Columbia emits zero greenhouse gases and provides safe and secure on-site storage of used fuel. The plant's outstanding environmental and safety record is matched by its strong long-term performance record. As such, it is clearly evident to our public power community that Columbia's continued generation of large quantities of reliable, affordable, environmentally responsible power to Northwest ratepayers is key to meeting the region's current and future baseload electricity needs.

We are also thankful and appreciative to Energy Northwest employees whose commitment and dedication to public power has led to the safe operation of Columbia Generating Station for more than 25 years.

Respectfully,

otin County

Benton PUD

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April 21, 2010 Clallam County PUD

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Pacific County PUD

City of Fort Angeles

Seattle City Light

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