

## Shroff, Behram

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**From:** Shroff, Behram - FSME  
**Sent:** Friday, June 25, 2010 10:30 AM  
**To:** Swain, Patricia  
**Cc:** Hsueh, Kevin  
**Subject:** RE: 2 questions

Patti: This action is to renew the license, not an EIS. Most of the facilities already have EAs. There are two active CPPs and several satellites, some active and others not; one is even as far as 90 miles west. It seems to fit the category of a complex EA.

Given the number of facilities, one could theoretically devise quite a few alternatives. But no additional land disturbance is involved. For this reason, re-licensing would be the proposed action and rejecting the re-licensing would be the required No Action alternative. I would prefer to have the contractor write the alternatives chapter, but with input from me and our SMEs. We have had too much trouble splitting the work between NRC and the contractors for the three SEISs and I think it's a lesson learned that should be followed.

OGC does need to be engaged in helping FSME to decide on the number of logical range of alternatives to be considered, especially for an EIS. Thanks

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**From:** Swain, Patricia  
**Sent:** Friday, June 25, 2010 9:31 AM  
**To:** Shroff, Behram  
**Cc:** Hsueh, Kevin  
**Subject:** RE: 2 questions

Behram,

The outline for the GEIS will not be precisely followed: specifically, the discussion of mitigation measures will be its own chapter (consistent with NUREG-1748).

You need to legitimately consider at least three alternatives in the analysis (if this is an EIS).

Since NRC is the decisionmaker (not the contractor), NRC needs to be involved in the development of the alternatives. It is not wise to take a "hands off" approach. If you brainstorm alternatives with your contractor, then they can probably support writing that chapter. If you have no input that is unacceptable; at some point I'd like to have OGC sit down with us to provide their perspective on "a reasonable range of alternatives."

Patti

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**From:** Shroff, Behram  
**Sent:** Thursday, June 24, 2010 3:42 PM  
**To:** Swain, Patricia  
**Subject:** 2 questions

Patti:

1. I suppose this is a policy question for management, but in writing SOWs and for future NEPA work, is the outline of the GEIS to be followed?
2. 1748 is a bit vague about the issue of how many alternatives are we to consider, especially for EAs: only the PA and NA?

- For a situation like the PRI license renewal, there are two CPPs and three satellites (one 90 miles west), and one could devise four legitimate alternatives. But since this is a license renewal, one could go with fewer than that, but can we stop at just the license renewal or no action (cessation of operations in 2011?).

I also find that in recent SOWs, NRC provides the contractor with Chapters 1 and 2. Why not have them do them all except #1?

Since I am writing the SOW for PRI, I would benefit from your thoughts. Thanks