

Exh. AES000105

# **Eagle Rock Enrichment Facility Mandatory Hearing**

## **ASLB Presentation Topic #2 Preconstruction Activities**

George A. Harper, VP of Engineering & Licensing  
Jim Kay, Licensing Manager





# Presentation Overview

- ▶ Describe the pre-construction activities that have been undertaken
- ▶ Address what types of redress/restoration actions would be mandated
- ▶ Address what redress/restoration action AES would anticipate actually taking



## Pre-construction Exemption

- ▶ **AES was granted an exemption to 10 CFR Parts:**
  - ◆ 30.4 – definition of “commencement of construction”
  - ◆ 30.33(a)(5) – general requirements describing commencement of construction
  - ◆ 40.4 – definition of commencement of construction
  - ◆ 40.32(e) - general requirements describing commencement of construction
  - ◆ 70.4 - definition of “commencement of construction”
  - ◆ 70.23(a)(7) - general requirements describing commencement of construction

Source: Exh. NRC000082



# Pre-construction Exemption

- ▶ **The exemption covers the following activities and facilities:**
  - ◆ **Clearing the site**
  - ◆ **Site grading and erosion control**
  - ◆ **Excavating the site including rock blasting and removal**
  - ◆ **Installing parking areas**
  - ◆ **Construction of storm water detention pond**
  - ◆ **Construction highway access roads and site roads**
  - ◆ **Installing utilities (e.g., temporary and permanent power) and storage tanks**
  - ◆ **Installing fencing for investment protection (not used to implement physical security plan)**
  - ◆ **Installing construction buildings, offices (including trailers), warehouses and guardhouse**

Source: Exh. NRC000082





## Activities Undertaken

- ▶ **Mitigation of historical resource MW004**
  - ◆ Began 10/7/2010
  - ◆ Completed 11/7/2010
- ▶ **Some limited pre-construction activities began 11/4/2010 were completed by 11/23/2010:**
  - ◆ Road improvements to existing farmer's road
  - ◆ Clearing & grubbing for site, main access road and construction power lines
- ▶ **No pre-construction activities have been performed to-date during 2011**

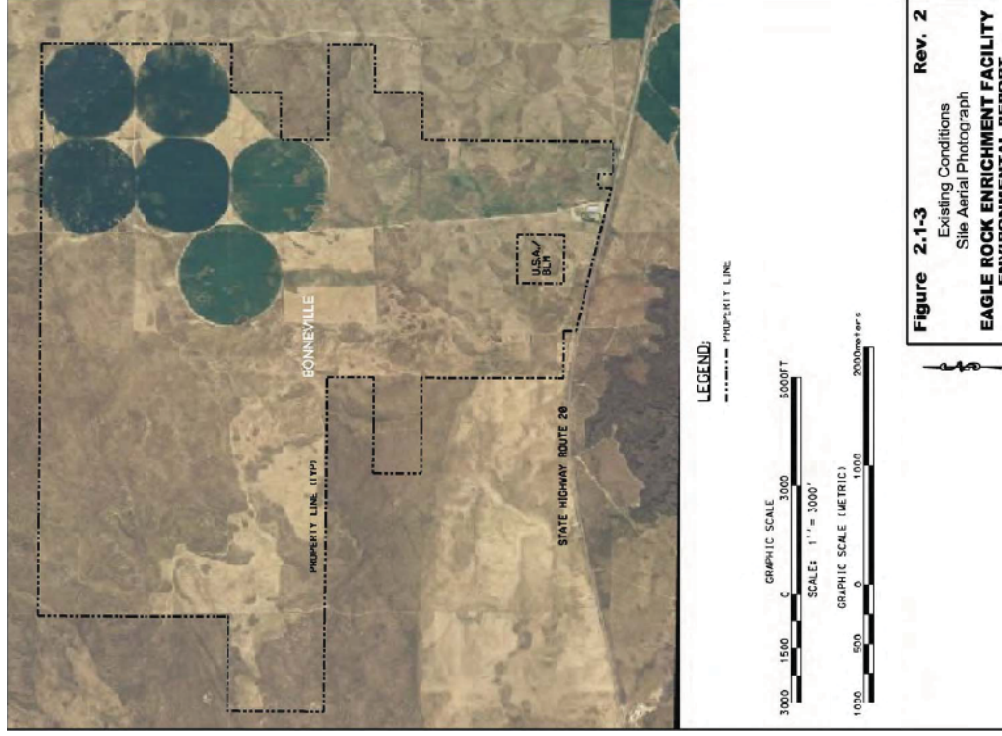
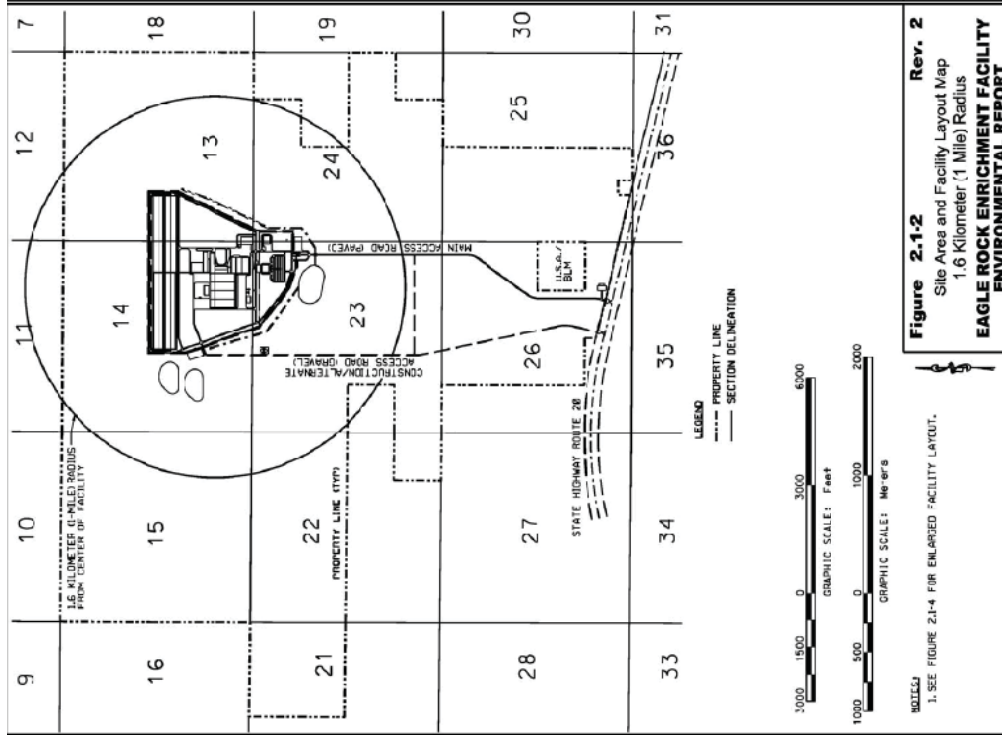


# Potential pre-construction activities for 2011

- ▶ **Potential activities for late Summer/Early Fall 2011**
  - ◆ **Topsoil removal**
  - ◆ **Continue clearing & grubbing**
  - ◆ **Drill/shoot rock and limited excavation**
  - ◆ **Road sub-base construction for the permanent access roadway**



# Site Layout & Area Map



Source: Exh. AES000070



# MW004 Mitigation (1/2)







# MW004 Mitigation (2/2)





# Road Improvements (1/2)



Looking North from near potato sheds – grading of existing road



Looking south towards potato sheds – grading of existing road





## Road Improvements (2/2)



Looking North from near potato sheds –  
after gravel placement



Looking south towards potato sheds –  
during gravel placement



## **Redress/Restoration Requirements Applicable to EREF**

- ▶ **Federal – The NRC has no site redress requirements for the activities that are permitted under the exemption**
- ▶ **State – Idaho has no site redress requirements**
- ▶ **Local – Bonneville County has no site redress requirements**



# Anticipated Redress/Restoration Actions

- ▶ **Redress/restoration actions that AES would anticipate taking:**
  - ◆ Re-grading of worked and stockpiled areas to preclude erosion due to channeled runoff and to minimize ponding
  - ◆ Stabilize areas, as appropriate, where pre-construction activities occurred by:
    - Soil placement
    - Vegetation plantings
  - ◆ Removal of all equipment or temporary structures
  - ◆ Removal of any added fencing

***Actions would focus on minimizing any hazards to humans or wildlife and minimizing adverse environmental impacts***



# Conclusions

- ▶ **Minimal pre-construction activities under the approved exemption have been performed**
- ▶ **There are no mandatory site redress requirements**
- ▶ **AES would re-grade and stabilize areas where pre-construction activities occurred, as appropriate, to minimize hazards to humans or wildlife and minimize adverse environmental impacts**