Docket, Hearing

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Sent: Friday, July 15, 2011 5:17 PM
To: Bollwerk, Paul; Eser, Jonathan
Cc: Docket, Hearing; 'Beatrice Brailsford'
Subject: Testimony from the Snake River Alliance
Attachments: July 2011 Areva Testimony Liz Woodruff_Final.doc; Brailsofrd_Oral testimony on the need for the Eagle Rock Enrichment Facility.doc; Final Talking Points Areva EIS.doc; Brailsford DEIS_Idaho falls final oral hearing testimony.doc; List of Proposed New Reactors.pptx

Dear Judge Paul Bolwerk:
Please see the attached comments and included link submitted on behalf of the Snake River Alliance relevant to the limited appearance session regarding the proposed Eagle Rock enrichment factory that took place in Idaho Falls on July 11, 2011.

In addition to the attached written comments that reflect the oral testimony given by Ms. Brailsford and myself, I have included our draft EIS testimony for reference and the following link to the report from Ms. Brailsford's oral testimony on July 11.
http://www.worldwatch.org/system/files/NuclearStatusReport2011_prel.pdf

I have also attached the chart of current reactor proposals to verify the decline of new proposals in the US from 19 to 12.

It remains our sincere hope the ASLB will seriously consider requiring a supplemental EIS in light of the "changed circumstances" surrounding this proposal as a result of the Fukushima disaster. We will look forward to hearing back directly from the Board regarding this request.

Thank you,
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The Snake River Alliance works for responsible solutions to nuclear waste and a nuclear-free future. It seeks to strengthen Idaho's economy and communities through the implementation of renewable energy resources in Idaho and the promotion of energy efficiency and conservation.

July 11, 2011

Liz Woodruff

Snake River Alliance Executive Director

Comments to the ASLB

Limited Appearance Session on the Proposed EREF

Members of the Atomic Safety and Licensing Board, thank you for the opportunity to speak with you tonight regarding Areva's proposed uranium enrichment factory here in eastern Idaho. My name is Liz Woodruff, and I am the Executive Director of the Snake River Alliance. The Alliance has been Idaho's nuclear watchdog for over 30 years. We represent 1,100 members state-wide.

We are grateful that this board has created an opportunity for the public to comment on the proposed facility in the midst of the Fukushima nuclear disaster. Since the Final EIS was issued in February of 2011, just prior to the March 11th crisis in Japan, it is imperative the EIS be thoroughly revaluated in light of the new economic context in the nuclear industry created by the crisis in Japan prior to the final granting of a license.

1) There was never a need for this facility. The entire premise of the draft and final EIS relies on an outdated letter by William Magwood (from July 2002) which hypothesizes that an increase in uranium enrichment will be needed for US security. This is not enough evidence to support the licensing of this facility, especially since the global and domestic market for new nuclear power plants is shrinking.

   The first approach to domestic and global security should be the continued down-blending of weapons grade material from Russia for use in domestic reactors. It is not simply enough for Areva to assert that Russia does not want to extend this agreement after 2013. The NRC staff should specifically evaluate whether, if Russia were to receive a fair price for down-blended HEU, it would continue this agreement or continue to supply LEU through other arrangements. To date, no argument exists from Areva or the NRC for why the continued dismantlement and down-blending of weapons grade material from both Russian and US stockpiles would not be the best approach to national and global security.

   Moreover, the uranium to be enriched at the proposed Areva facility would originate as raw uranium outside the US. How does enriching uranium here, while still receiving it from foreign sources, result in domestically controlled uranium? This argument is like claiming that because we refine oil in the US, we have a domestic supply of oil, even though the resource originates in the Middle East. The uranium market is in fact a

global market. There is no provable threat to energy security as a result of the global trade in uranium. The Areva facility is not needed to make the US more "secure."

2) The proposed facility is not necessary to meet the fuel demands of the current fleet of US reactors. The Urenco facility in New Mexico has started production and will reach half its operating capacity next month—even though the Final EIS makes production sound far off. Moreover, the projected SWU requirement cited in the Final EIS of 15 to 16 million SWUs is in excess of the current need and particularly in light of events in Japan, the forecast used in the FEIS (made in 2010) should be revised. The fact that the NRC staff has chosen not to reanalyze this forecast and make public its findings is troubling. A thorough review of this forecast should be conducted by an entity other than the applicant. Furthermore, does the projected demand in the final EIS include new reactors? If so, how many? We also remain puzzled that the DOE has not weighed in on whether there is a need for this facility. Press releases and other generic statements are not adequate to replace thorough evidence, analysis and a substantiated position by the DOE regarding the actual need for the facility.

3) The proposed facility is not needed to meet any future demand for enriched uranium by a new fleet of US reactors because the existence of that new fleet is unlikely. The already long delayed South Texas Project reactor development lost its funding from NRG Energy on April 19th, 2011. The financer cited Fukushima as the final factor that made building new nuclear reactors too "daunting." Calvert Cliffs has been cancelled, too. In fact, whereas three years ago there were 19 applications for new reactors in the US, today that number has dwindled to 12. Claims by Areva that it has 90% of its contracts established must be qualified by statements in the FEIS that 60% of the contracts have been finalized. The additional 30% are in process and not finalized. Additionally, many of that 30% are from foreign sources. Finally, the estimated forecasts by Areva are based on projected increases in capacity at current reactors, which may very well change overtime.

Areva cannot have it both ways. It cannot argue that the facility is needed only for *current* domestic use, when it is clear that given current demands this facility would create an excess supply. And it cannot cite a future demand without providing solid evidence that future demand from new reactors will occur. The NRC must engage in a thorough review of the FEIS forecast regarding the enriched uranium market in the wake of the Fukushima disaster. The answer to the question "Is this facility necessary to meet an existing or future need in spite of the environmental, public health and safety and economic risks associated with the proposal?" is clearly "No." The costs associated with the facility outweigh the one asserted benefit of meeting a hypothesized need. The question should not be "Does Areva want to build an enrichment factory and should we let them?" This latter question has seemingly been the focus thus far, and this Board should use this opportunity to re-frame that question and explore alternative answers.

Without a "nuclear renaissance" this facility cannot be justified. After Fukushima, the "renaissance" is even less likely. Here is additional evidence of the changed circumstances in the uranium enrichment market following Fukushima

From Idaho Congressman Mike Simpson quoted in Fortune Magazine

"Politically, this will slow down nuclear," says Rep. Mike Simpson (R-Idaho), a co-chair of the Nuclear Issues Working Group. "It might make it harder for new nuclear facilities to get loan guarantees. It might slow down the effort to push more nuclear power out the door. That's just being realistic."

From WISE Uranium

Roswell-based Ux Consulting said on Monday (May 9) it expects there to be about a 10% reduction in nuclear generating capacity globally by 2020 as a result of the Japanese nuclear disaster in March. Ux said it had revised its expectations downward by 43 GW of global nuclear power-generating capacity to 490 GW, with 545 operational reactors by that time. (Mining Weekly May 9, 2011).

From an industry executive

"It's betting the farm for a lot of utilities" to currently invest in traditional large-scale plants, said Christofer Mowry, president of Babcock & Wilcox's nuclear energy group. Reuters, July 14, 2011.

NRC regulations for the implementation of the National Environmental Policy Act (NEPA) require the NRC to prepare a supplemental EIS in the event of "changed circumstances bearing on environmental concerns and bearing on the proposed action or its impacts." See 10 CFR 51.92(a). Three worldwide trends have combined to create just such changed circumstances with respect to the need for the proposed Areva uranium enrichment facility: a significant depression in the uranium market following the nuclear crisis in Japan, greatly increased cost estimates for new reactors, and a markedly reduced pace of new nuclear project construction. In light of these trends, the EIS' assertion that there is a need for the proposed Areva uranium enrichment factory – i.e., that its environmental impacts are justified -- is not supportable. Therefore, as required by 10 C.F.R. 51.92(f)(1), the NRC must revise the EIS and publish it in draft for public comment. If the EIS is not revised and re-published, the application must be rejected.

The DOE and the NRC are large federal agencies partially tasked with formulating sound energy policy and regulating an industry that poses serious public health and financial risks to US citizens. They should absolutely take more time to reflect on the effects of the Fukushima crisis on the nuclear industry as a whole, including the global and domestic future demand for

enriched uranium. The ASLB should not make its decision solely based on the forecasting of the applicant. Thank you for your time and consideration of these comments and for your careful contemplation of these issues.

Oral testimony on the need for the Eagle Rock Enrichment Facility
July 11, 2011, Idaho Falls, Idaho
Beatrice Brailsford, Snake River Alliance

I thank the Atomic Safety and Licensing Board for this opportunity to discuss the need for the Eagle Rock Enrichment Facility as you consider licensing the facility.

The need for the facility was always problematic. The argument in its favor rested to an inordinate degree on a 2002 letter written by William Magwood when he was Assistant Secretary at the Department of Energy. That's a very shaky foundation for what is purported to be a cornerstone of this country's energy and national security policy.

Nuclear Engineering International addressed the enriched uranium supply question in a November 2009 analysis: "Enrichment requirements for the world's growing fleet of nuclear power plants are expected to expand significantly. Current enrichment capacity on a world-wide basis is just sufficient to meet requirements, but the potential pace of enrichment capacity expansions is expected to out-strip the growth in requirements." That's because the so-called nuclear renaissance is not occurring as planned. For instance, there were 444 nuclear reactors operating worldwide in 2002; in 2011 there are 437. That decrease is not a forecast; it is a fact.

One of the reasons the "nuclear renaissance" is not occurring is the ever-growing cost of building a reactor. Their price tag has doubled and the list of applicants for a license has decreased from 19 to 12. The "renaissance" is so anemic that there aren't even applicants for all the federal loan guarantee funds currently available.

And then the disaster in Fukushima occurred, calling into question any nuclear expansion and in fact taking current reactors off-line. Germany shut down 7 reactors immediately and plans to abandon its other 9 within years. The Swiss have voted to shut down their 5 reactors. Before Fukushima, Japan had 54 reactors operating. Now it has 19, and it's not at all certain that the majority of the shutdown reactors will ever restart. The recently shut down or soon to be shut down reactors account for something like 5 to 6 million SWUs of enriched uranium no longer needed.

All of this led industry consultant UxC to estimate global reactor requirements for uranium will now be, comparing pre-Fukushima to post-Fukushima estimates, 3.5% lower in 2015, 9.7% lower by 2020 and 14% lower by 2030. In addition, Areva itself has decided to slow its investment in mine developments based in Niger and Namibia.

Because of the decline in the uranium market after Fukushima, the skyrocketing cost of new reactors, and the slowed pace of nuclear development, the NRC should prepare a supplemental environmental impact statement that reexamines the need for the Eagle Rock Enrichment Plant.

Thank you.

Oral testimony on draft environmental impact statement for the proposed Eagle Rock Enrichment Facility in Bonneville County, Idaho
Beatrice Brailsford, Snake River Alliance
Idaho Falls, August 13, 2010

I would like to speak about one of the most important parts of an environmental impact statement: the examination of the purpose and need for the proposed action. According to the current draft EIS, the purpose of Areva's Eagle Rock Enrichment Factory is to meet two needs: 1) for enriched uranium to fulfill electricity generation requirements; and 2) for domestic supplies of enriched uranium for national energy security.

That first "need"—enriched uranium for electricity generation—is undeniably true as long as the majority of nuclear reactors use low-enriched uranium fuel. But the draft EIS does not even *attempt* to make the case that that need is not already being met. Furthermore, the draft clearly acknowledges that, even if the "nuclear renaissance" occurs as advertised, already planned new enrichment would exceed US demand by about the same amount as Areva's factory might produce.

The "national energy security policy objective" Areva's plant is supposed to meet was enunciated in a 2002 letter from the DOE to the NRC. The focus of the letter was not that the US needed a foreign company to build a plant here but rather that an American company should have a stake in US enrichment capacity. Eight years later, there are no more nuclear reactors operating in the world, but as of June, Urenco, a German company, is enriching uranium—in New Mexico. The NRC's efforts to ignore that plant in the draft EIS are painful to behold.

At any rate, let's go back to the need for domestic supplies of enriched uranium. The key word here is "domestic." Areva is owned by the *French* government. Areva has said the natural uranium destined for its plant *does,* in fact, belong to American companies. But according to the Nuclear Energy Institute, US nuclear power plants bought 92 per cent of their uranium from foreign sources in 2007. And where is the uranium converted? According to the draft EIS, in Illinois, Canada, and…overseas.

And finally, the product, enriched uranium. The draft EIS tells us that all Areva's enriched uranium could "theoretically" be sold to US companies. But it also tells us that potential customers are in Washington, South Carolina, North Carolina, and…overseas. Is Overseas the name of a new state?

But perhaps the theory will play out. Areva has said US companies have already signed contracts for half its projected product. Those contracts do raise a question, though. I know the NRC has already heard concerns that it has a bias toward licensing. What about selling the product of a plant that doesn't even have a license yet? I'd say we've gone well beyond a learner's permit here.

The most "domestic" part of the proposal is that the waste will in fact stay here. The plant would produce 350,000 tonnes of depleted uranium hexafluoride over its licensed lifetime, and the door is already ajar for the license to be extended. That waste might be stored on outdoor concrete pads above the Snake River Aquifer until the plant is decommissioned. It's worth noting that New Mexico sharply limits how much and how long waste can stay at the plant there. The waste has to be treated before it can be disposed of. Two government-owned treatment plants are under construction, over budget, and behind schedule; waste the US has already accumulated will take a combined 43 years to process.

The draft EIS essentially ignores the fact that the US does not have guidelines on how large quantities of the treated waste will be disposed of, but it will most certainly be disposed of in the United States.

So that's the proposal to meet the need for a domestic supply of enriched uranium. A uranium factory without any strong national purpose will produce fuel for everywhere in the world but here in Idaho, send its profits to France, and leave us with the waste. It is as if every barrel of crude oil we imported from the Middle East, then refined here, would no longer be foreign oil. Addiction cured!

I was born the same year the National Reactor Testing Station was established, and I am aware of the benefits it has brought. I am aware, too, of the costs borne by all of Idaho.

Snake River Alliance Testimony on Draft EIS
NRC Meeting in Boise, ID
8/9/2010

Radioactive Waste Poses an Unacceptable Risk

- Radioactive material is inherently dangerous. Just the activities *directly connected* with uranium enrichment pose risks, as do all other parts of the fuel chain. The NRC should perform a complete analysis of the risks of uranium mining and milling, mixing yellow cake with hexafluoride (itself a dangerous material), enriching UF6 in gas centrifuge plants, storing and deconverting depleted UF6, disposing of depleted uranium and low level waste, fabricating fuel from enriched uranium, and all intermediate transportation steps.

Purpose and Need for the Facility

- The draft EIS fails to establish that the current approach to supplying enriched uranium is unreliable. There is uranium enrichment in the US, enriched uranium has always been an international market, the raw material comes from foreign sources, and this system has adequately provided fuel for US reactors for decades.
- Since the uranium slated for enrichment will be from foreign sources, the licensing of this facility does not in fact create increased domestic control of reliable supplies of enriched uranium (draft EIS, 2-6)
- The EIS specifies that the numbers of license requests for new enrichment facilities in the US are in excess of the need for new enriched uranium (draft EIS, 1-6). The EIS does not adequately prove that the Areva facility is necessary.
- The EIS clearly states that Areva's product will be shipped overseas, therefore nullifying the project's effects on domestic uses of enriched uranium. Because Areva is a French company, its production of enriched uranium in the US does not actually result in domestic control of that product (draft EIS, 2-17).
- The EIS claims that the need to be fulfilled by the Areva facility will be spurred by the building of a new fleet of reactors. Economic costs, delays, and safety issues all indicate that this supposed resurgence is not only improbable, but unlikely.

Waste Management

- The draft EIS assumes that depleted uranium hexafluoride will not be stored on site beyond the licensed life of the facility. But the draft EIS also acknowledges that Areva may well apply for a license extension. The NRC must discuss the length of a potential extension and whether or not cumulative waste storage would be allowed.
- The lack of a fully developed rule on disposal of depleted uranium creates great uncertainty about the disposal pathway for this waste.
- Since no deconversion facilities are operational in the US, and if they do become operational they will first process already existing depleted uranium waste, the time-line for the removal of DUF6 from Idaho is uncertain.

Bias Towards Licensing

- Because of an exemption granted in March 2010, Areva will be allowed to start "preconstruction" activities as early as October 2010. This preconstruction exemption shows a bias towards licensing. It appears the NRC has already made the decision to allow the project to move forward even before the necessary impact assessments and public comment periods have been completed. draft EIS, xxviii)

- Preconstruction constitutes one part of a major federal action. 40 CFR 1500.1(b) requires that information be available *before* an agency makes decisions or takes any action. Considering that public comment is open until September 13, 2010. It is impossible for the NRC to produce a final EIS and ROD before preconstruction starts in October.

- It is clear that great environmental impacts will occur in preconstruction. However, operation of the facility, the existence of radioactive materials on site, and the long-term consequences of the indefinite storage of DUF6 above the aquifer are also significant and have been inadequately evaluated in the EIS.

Threat Posed by Fire

- The draft EIS fails to even consider the threats associated with wildfires at the proposed site. While the draft EIS looks specifically at the geology and weather patterns at the site, it does not provide a detailed analysis of the threats posed by fire. The recent example of the Jefferson Fire at the INL (and within range of the proposed EREF) demonstrates this is a real hazard which warrants specific analysis.

Ecology

- According to the NRC's own definition of the significance of potential impacts, a large impact is one that "the environmental effects are clearly noticeable and are sufficient to destabilize important attributes of the resource." According to the draft EIS, the sage-brush steppe located within the proposed EREF would improve due to the elimination of grazing. The NRC must flesh out the connection between claims of potential improvements and the amount of habitat that will be compromised.

- Several species will be impacted by development on this land including sensitive species, raptors, and sage-brush obligate species (draft EIS 4.2.7). Pronghorn antelope, greater sage-grouse, and ferruginous hawks all will likely abandon the EREF site and areas surrounding the EREF due to development and human activity. It is difficult to see how, when an ecosystem is considered as a whole, it be improved if the animals that depend on it can no longer use it. In other words, it is not a healthy sagebrush ecosystem if there are no antelope, grouse, and hawks. The conclusion of small to medium potential ecological/wildlife impacts contained in the draft EIS is inaccurate based on the true scale of ecological effects.

- This problem is compounded by construction of the proposed electric transmission line and poles, which sage-grouse are known to avoid because they serve as perches for raptors.

- Sage-grouse is a candidate species for federal ESA protections. USFWS recently concluded that listing under the ESA is warranted, though formal listing is precluded by other agency priorities. The treatment of this issue is inadequate in the draft EIS. These concerns are addressed in greater detail in the Transmission section below.

Accidents

- The risks of accidents associated with the transportation of radioactive materials into and out of the site should require the Nuclear Regulatory Commission to notify all relevant regional offices when radioactive material will be shipped to and from the Areva facility.

Air quality

- Are the filtration systems set up to decontaminate water prior to evaporation adequate to ensure that contaminants will not be released in the air?
- The amount of radioactive material that will be present on the proposed site represent an implicit severe threat to air quality in the event of an accidental release of radioactive toxins.

Alternatives

- Since the only justification for the facility is an asserted but unsupported need for domestically produced enriched uranium, which EREF does not in any case provide, a "no action" alternative should be chosen.

Compliance with applicable regulations

- The EIS may not be in compliance with the Federal Farmland Protection Act.

Geology and soils

- Due to the indefinite storage of depleted uranium hexafluoride on site, seismic activity in the area of the proposed facility poses a major safety hazard that could lead to a critical level accident. The NRC should clarify why a complete analysis of seismic risk is delayed until the Safety Evaluation Report.

Greenhouse gas emissions

- The draft EIS (4-136) stretches credulity in attaching "GHG sink" attributes to EREF. The reasoning in the EIS is that the project should be considered a greenhouse sink because it would produce enriched uranium for use in nuclear reactors that might replace traditional coal and other fossil fuel plants. This tertiary GHG benefit is improper particularly in light of the EIS's failure to acknowledge the secondary and tertiary environmental and public health threats created by EREF and its operations, from uranium mining to disposal of reactor waste and reactor decommissioning. If the EIS credits EREF for such greenhouse gas emission reductions due to its contribution to nuclear reactors, it must also credit EREF for the known environmental and health threats that are also attributed to the same nuclear reactors.

Historic and cultural resources

- Construction of the facility would lead to the destruction of a site that has been recommended for the National Register of Historic Places. The John Leopard homestead (MW004), would be destroyed in preconstruction activity. A Memorandum of Understanding must be signed with the Idaho State Historic Preservation Office before any activity is initiated that would affect this historic site.
- The draft EIS (draft 4-5) notes that "The greatest potential for impacts on historic and cultural resources would occur during ground disturbance during preconstruction." Yet these preconstruction activities are specifically removed from review in this study.

Land Use

- The EIS claims that the licensing of this facility is exempt from the Farmland Protection Act since the site is on private property (EIS, 3-3). But because Areva has accepted a $2 billion federal loan guarantee from the Department of Energy, the Federal Farmland Protection Act applies to this license and the required procedures under the Act must be completed prior to licensing.

Proliferation (beyond the scope of the EIS)

- The NRC should produce an unclassified non-proliferation assessment for the Areva enrichment plant. To refuse to do so based on the fact that Areva intends to enrich uranium to no more than 5% misses an important point. Gas centrifuge uranium enrichment is a proliferable technology. A comparable case occurred in Idaho during the environmental evaluation of pyroprocessing. In that instance, no one was arguing that the DOE intended to recover pure plutonium. But, because pyroprocessing is a proliferable *technology,* the DOE produced a non-proliferation assessment as part of the final EIS on the *facility.*

State and federal largess (beyond the scope of EIS)

- In 2008, the state of Idaho showered Areva with huge tax breaks funded by Idaho taxpayers, including a cap on property tax valuation at $400 million and unnecessary sales tax exemptions.
- Warned by Areva that it probably wouldn't build the enrichment factory without US taxpayer support, the Department of Energy reached into your pockets to grant the French-owned company a $2 billion loan guarantee.
- Not convinced the state had already done enough, the state Departments of Labor and Commerce gave Areva $750,000 to help offset the cost of a highway interchange at its site, even though the project hadn't been approved by the NRC and sidestepping traditional Idaho Transportation Department review.

Transmission (beyond the scope of the EIS)

- The NRC's exemption that authorizes Areva to undertake preconstruction activities as not part of the proposed action (draft EIS xxvii) should not include exempting utilities installations, including transmission lines and associated substations and other utility infrastructure. Installation of 80-foot, 161kv transmission lines should not be considered as having "cumulative" impacts but rather direct impacts that must be analyzed in the EIS. Contrary to assertions (draft EISk 1-10) that "this transmission line is not considered by the NRC to be part of the proposed action," EREF could not function without the transmission line, which is critical to the proposed action.
- The routes for some proposed new transmission lines, including the proposed Mountain States Transmission Intertie, have not been determined and as such should not be considered as certain future transmission infrastructure.
- The draft EIS should analyze the benefits of burying any additional transmission lines to minimize the acknowledged harmful impacts to birds, bats and other wildlife. This is especially important given "impacts of transmission line construction and operation could also include wildlife disturbance and wildlife mortality." (4-150
- The Idaho Department of Fish and Game, a response to NRC dated April 14, reaffirmed the threats transmission lines would pose to wildlife (draft EIS B-26) and challenges the methodology of sage grouse and lek analysis in the EIS (B-27), recommends burying transmission lines, and suggests Areva submit to the NRC for review plans to mitigate for the expected wildlife impacts. These concerns do not appear to have been addressed in this EIS.

Transportation

- The EIS should fully evaluate the safety threats posed by the transportation of radioactive material into and out of the EREF. The accident scenarios should include an analysis of the potential environmental and public health effects of an accident on roadways in the event of a spill of the various radioactive materials that will be transported to and from the facility: uranium hexafluoride; enriched uranium, and depleted uranium.

Visual and scenic resources

- The proposed facility will have a visual impact on the Hell's Half Acre National Monument.

Water resources

- The facility will store radioactive waste above the sole source aquifer for nearly 300,000 people. This threat to a vital and unique resource outweighs any perceived benefit of the facility.

For more information call 208.344.9161 or email [redacted]

List of Proposed New Reactors

William Lee (2)	South Carolina	AP-1000	Has CWIP; delayed > 2021
Turkey Point (2)	Florida	AP-1000	Has CWIP; delayed > 2021
Levy County (2)	Florida	AP-1000	Has CWIP; delayed > 2021
Shearon Harris (2)	North Carolina	AP-1000	Has CWIP; delayed
Calvert Cliffs (1)	Maryland	EPR	In line for LG; No US partner
Bell Bend (1)	Pennsylvania	EPR	Delayed
Fermi (1)	Michigan	ESBWR	No CWIP/LG
South Texas (2)	Texas	ABWR	In line for LG; No US partner
Comanche Peak (2)	Texas	US-APWR	In line for LG
North Anna (2)	Virginia	US-APWR	No CWIP/LG; Delayed