



In response reply to
1992-PIK-2005

May 8, 2017

Cinthya I. Román, Chief
Environmental Review Branch
Division of Fuel Cycle Safety, Safeguards, and Environmental Review
Office of Nuclear Material Safety and Safeguards
United States Nuclear Regulatory Commission
Washington, DC, 20555-0001

Re: Disposal of Waste from the Lead Cascade Facility (Docket Number: 70-7003)
Portsmouth Gaseous Diffusion Plant (PORTS), Pike County, Ohio

Dear Ms. Román,

This is in response to correspondence from your office dated April 13, 2017 (received April 14) regarding the above referenced project. The comments of the Ohio State Historic Preservation Office (SHPO) are submitted in accordance with provisions of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470 [36 CFR 800]); the Nuclear Regulatory Commission serves as the lead federal agency.

The project involves packaging classified matter and contaminated waste for shipment and disposal. This undertaking will package and ship waste offsite for burial in an appropriately licensed facility. The SHPO understands that safety and timeliness are important in working with contaminated waste material from the Lead Cascade Facility.

While the SHPO sees no reason to object to the direct implementation of the decontamination clean-up work, we are concerned about the potential for project segmentation and recommend that a considerable amount of consultation remains to be conducted as this part of the undertaking moves forward. For reasons discussed below it is the opinion of the SHPO that the findings for this undertaking better align with No Adverse Effect for the initial clean-up part of a phased undertaking. We believe that this finding will allow meaningful participation of consulting parties as the subsequent phases of the undertaking are planned and initiated.

The Portsmouth Gaseous Diffusion Plant Reservation constitutes an historic property. We stress that the Cascade Lead Facility is within and is part of an historic property. We agree for this part of the undertaking that removal of contaminated waste does not diminish the qualities that make this historic property significant. However, the decontamination work sets in motion direct and foreseeable consequences that will result in substantial changes in, around, and to an historic property. It may be possible but quite difficult to imagine that these changes will not contribute to an adverse effect.

Ms. Cinthya I. Román
May 8, 2017
Page 2

The SHPO recommends that the Nuclear Regulatory Commission (NRC) initiate as soon as practical a greatly expanded consultation to engage a broad range of consulting parties with information about what these changes mean now and within the context of direct and foreseeable consequences. This consultation must provide opportunities for consulting parties to understand the basis of the decisions that have been made and will be made. Also, this consultation must afford consulting parties ample opportunities to offer ideas and recommendations for the NRC to integrate into its planning as this undertaking unfolds.

Also, we recommend that the NRC provide copies of correspondence regarding this undertaking to the Advisory Council on Historic Preservation and the Department of Energy – Portsmouth Office (our standard contact is: Amy Lawson, U.S. Department of Energy, PORTS, P.O. Box 700, Piketon, OH 45661).

Any questions concerning this matter should be addressed to David Snyder at (614) 298-2000, between the hours of 8 am. to 5 pm. Thank you for your cooperation.

Sincerely,



Diana Welling, Department Head
Resource Protection and Review

DW/ds (OHPO Serial Number 1068418)

OHIO HISTORY CONNECTION

800 E. 17th Ave., Columbus, OH 43211-2474 • 614.297.2300 • ohiohistory.org