

ClinchRiverESPEISCEm Resource

From: Long, Larry <Long.Larry@epa.gov>
Sent: Tuesday, May 30, 2017 2:56 PM
To: ClinchRiverESPEIS
Cc: Vokoun, Patricia; Militscher, Chris
Subject: [External_Sender] Informal Pre-permit Clinch River Nuclear Site

I have reviewed the Nuclear Regulatory Commission's Opens House materials and the federal registry solicitation for public comments in reference to Tennessee Valley Authority's (TVA) Pre-Permit application for the Clinch River Nuclear generation station in Oak Ridge TN. Keeping with Nuclear Regulatory's (NRC's) mission to protect public health and safety, promote common defense and security, and to protect the environment, along with EPA's mission for the protection of public health and the environment, Region 4 NEPA Program Office provides the following comments for your considerations.

NRC and TVA may want to consider the advantages of early consultation with federal, state and tribal agencies for the purpose of streamlining the permitting process during the NEPA analysis. One advantage of an early consultation process could be TVA obtaining their environmental permits shortly after the NEPA Record of Decision (ROD) issuance. The inclusion of NRC's systematic approach (10 CFR Part 51) along with state and federal permitting issues into the NRC's pre-permitting process can provide a streamline NEPA analysis that helps to eliminate duplications in the permitting analysis. This will help to provide a more productive analytical process overall.

NRC and TVA may also want to consider incorporating the Army Corps of Engineers into the early consultation process to include Clean Water Act (CWA) 404 permitting requirements, such as avoidance and minimization, along with mitigation requirements, if any.

A major issue with nuclear facilities is the disposal of radioactive waste products. NRC may want to consider an economic feasibility comparison study for vitrification of waste products verses current storage and disposal practices as part of the EIS.

Please provide us with a copy (electronic, CD with two hardcopies) of future NEPA documents when they become available.

Thank you for your time.

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