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COMMENT (2)  
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Director, Division of Fuel Cycle Safety and Safeguards

U.S. Nuclear Regulatory Commission

Washington, DC 20555-0001

Re: Requests for NRC Actions for/regarding the Westinghouse Nuclear Fuel Fabrication Plant in Columbia SC:

Dear Mr. Erlanger,

The John Bachman Group of Sierra Club, covering 7 counties in the Midlands region of South Carolina requests that the Nuclear Regulatory Commission halt consideration of a new forty-year license for the Westinghouse Nuclear fuel fabrication plant, license #SNM-1107 (and Docket Number NRC-2015-0039) in Columbia, SC and reopen the National Environmental Policy Act (NEPA) related to the license renewal.

To determine if the relicensing is appropriate and necessary, the Environmental Assessment associated with relicensing of the plant must be revisited to include all germane data on nuclear incidents such as leaks, discharges, and nuclear criticality, all vital to make a determination as to whether relicensing should occur. In recent years and months several serious nuclear incidents have occurred at the Westinghouse's Columbia Fuel Fabrication Facility which would warrant deeper investigation into their effects on the environment and human health. Critical, additional public input from and engaging with the local community by Westinghouse has been inadequate, and the proceedings for the EA must be reopened.

On March 15, 2018, there was an incident involving a deviation from Criticality Evaluation Procedures reported only to the NRC but not to the local community or to the South Carolina Department of Health and Environmental Control (SCDHEC). On July 23, 2018, a hole was discovered in the floor into which was leaking uranium laced liquid which soaked into the concrete and soils under the facility. Reported in the media, the incident sparked a public meeting request, not by Westinghouse, but by elected officials.

The public meeting on August 13, 2018, engaged outraged citizens whose questions were either inadequately or not at all answered by Westinghouse and/or SCDHEC or the NRC. No representative answered the questions about how much liquid had leaked from the tank and about how much uranium escaped. How deep and wide has the leak gone after having leaked through the liner hole and the concrete? How the ground water could be affected now and over the course of years is another unanswered question.

Though the meeting was designed by the organizers, Westinghouse, and DHEC to be limited to the July 23 incident, the public demanded answers concerning historical problems and promises avoided by Westinghouse. To which, notification to the local rural and low-income community surrounding said plant is unacceptably ineffective. Publishing procedures, deadlines, event reports, etc. published only the obscure NRC website cannot be considered adequate. In this modern era social media, television, and radio must be included, as public announcements typically capture the attention of the public.

In 2016, an incident involving an internal build-up of large amounts of uranium in the filter and duct systems at the plant caused public alarm. At a public meeting, questions about danger levels were not answered clearly. At an NRC meeting on the incident, Westinghouse assured the community it would be more diligent in informing the public when such incidents occurred and would work with the community on revealing the evacuation plan. Now, in 2018, the assurances turned out to be broken promises. There have been no instruction sessions, no special meetings with the community, and no marked routes for evacuation.

These deliberate avoidances are a clear indication the management and operations team have not been and continue not to demonstrate competence and not to be thoroughly diligent; therefore, Westinghouse likely should not be allowed to pursue a relicensing of the plant until accountability is demanded and demonstrated to the NRC and the public. Most certainly, the NRC should reject Westinghouse's application inclusion of relicensing for an unheard of 40-year span of time.

The John Bachman Group, Sierra Club, in agreement with the letter to you from Tom Clements of Friends of the Earth, makes the following requests of the NRC:

1. Reject and completely stop consideration of any license renewal at this time until the full NEPA process is followed, including fulfilling the intent as well as the letter of the Act, which requires full and transparent public process and accountability with teeth;
2. Reject the request for a forty-year time span of any nuclear license; for this facility or any other;
3. Make an official determination to reopen the EA and require public meetings be held in the local community (known as Lower Richland) to solicit input directly in this community on the environmental impacts and health impacts of the plant and its operations on the public and on the employees of the plant;
4. A full, revised EIS be written and considered after all oral and written comments on the reopened EA are made and responded to;
5. Develop an effective means of communication with residents regarding all incidents and discharges from the current Westinghouse plant in question, including communications from both Management of the plant and from the NRC;
6. Clarify for the public the roles and responsibilities of the NRC regarding the plant;
7. Exact a schedule/timeline for the development, communication, training, and posting of an evacuation plan for and to the public.

Thank you for your time and effort in these matters. I look forward to your positive response soon.

Sincerely,

Pamela Greenlaw

Chair, John Bachman Group, Sierra Club (in the Midlands of South Carolina)