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# PUBLIC SUBMISSION

**Docket:** NRC-2015-0039

Westinghouse Electric Company, LLC; Columbia Fuel Fabrication Facility

**Comment On:** NRC-2015-0039-0006

Westinghouse Electric Company, LLC; Columbia Fuel Fabrication Facility

**Document:** NRC-2015-0039-DRAFT-0035

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## General Comment

See attached file(s)

## Attachments

Westinghouse 2019 Draft EA Public Comments



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November 27, 2019

Office of Administration  
Mail Stop: TWFN-7-160M  
US Nuclear Regulatory Commission  
Washington, DC 20555-0001  
ATTN: Program Management, Announcements and Editing Staff

RE: Dockets No. 70-1151, NRC-2015-0039

Dear Nuclear Regulatory Commission,

Friends of Congaree Swamp would like to offer the following comments on the Draft Environmental Assessment for Westinghouse Electric Company LLC/Columbia Fuel Fabrication Facility.

We request that an Environmental Impact Statement be prepared rather than an Environmental Assessment, largely due to uncertainty arising from WEC's Consent Agreement with SC Department of Health and Environmental Control. We also note WEC's poor record of notification and compliance and do not feel that their actions under the previous permit warrant a 40-year extension. Hence, we recommend Alternative 1-License Renewal for Less than 40 Years.

The Draft Environmental Assessment rightly notes the history of recent incidents at WEC, but de-emphasizes the troublesome handling of these incidents. First, there is the context of the re-opened Environmental Assessment. Less than a month after issuing the draft Environmental Assessment and FONSI in June 2018, a leak at HF Spiking Station #2 released uranyl nitrate and hydrofluoric acid into the soil, an incident that further raised concerns about WEC's environmental and safety record. WEC's initial response to the report of this incident also raised alarms; they planned to monitor any COPC migration using an existing monitoring well 190 feet away from the site; at typical rates of groundwater flow, contamination would not be detected for over a year. Fortunately, SCDHEC requested a more aggressive sampling plan.

Leaks including radionuclides from a contaminated wastewater line in 2008 and 2011 were not reported at the time they occurred, and only came to light recently. The 2011 incident is particularly concerning because WEC at that time was petitioning SCDHEC to

decommission air sparging and soil vapor extraction onsite. Currently, Westinghouse proposes no soil remediation for the 2011 leak because it would be inconvenient to do so; remediation from this leak should be a pre-condition for a new permit.

Another incident from 2019 raises questions as well. During a May 2019 inspection, SCDHEC found numerous intermodal containers containing storage barrels that had not been previously reported. Some of these intermodal containers were not well maintained, and contamination has been found on-site. Further, these containers, designed only for temporary storage, had been used for storage for up to 14 years. Though this incident appears in the Environmental Assessment, WEC's failure to disclose the site and existing contamination shows lack of attention to proper site management and disclosure. Further, the Environmental Assessment makes no mention of the accidental nature of the discovery of this problem.

Unfortunately, the Communications Protocol recently prepared as part of the Consent Agreement leaves too many reporting decisions to WEC's discretion. Given WEC's history, we are not confident that future incidents will be disclosed in a timely manner. A shorter license renewal permit would provide an opportunity to ensure that WEC has changed its reporting culture.

We include some shorter notes below:

- In Section 3.1.2, Congaree National Park's recognitions should also include Ramsar Wetlands of International Importance and federally designated wilderness. Waters within the 1988 boundary expansion are Outstanding Resource Waters, while Cedar Creek is the only Outstanding National Resource Waters in the state. American Rivers has recognized Congaree River as a Blue Trail, and the Congaree River is a National Recreation Trail.
- In Section 3.5.1, the discussion of possible impacts on wildlife needs to be rewritten. The site is on the ecotone between the Congaree River floodplain and bluff ecosystems and lies along obvious migration/transit corridors for a large variety of wildlife. Impacts of the site on wildlife need to be more carefully considered.
- In Section 3.6.2, Wood Stork and Rafinesque's Big-eared Bat are species of concern that occur in the area; the environmental assessment should more specifically discuss impacts on these species.
- In section 3.9, note that Hernando de Soto traveled through South Carolina in 1540, not 1545.

We will note the many uncertainties that remain to be addressed as part of the Consent Agreement, some of which may have long-lasting impacts: the uncertain scope of remediation of the East Lagoon; the possibility of groundwater contamination into the floodplain through yet-to-be-documented pathways; the unknown source of Technetium-99 contamination; the unknown sources of the two CVOC groundwater plumes. These large unresolved issues are strong arguments for an Environmental Impact Statement. With seven years till renewal, there is ample time to conduct a more thorough environmental investigation. Further, we will have a better sense of the scope of

environmental problems on site as the Remedial Investigation under the Consent Agreement evolves.

Sincerely,

A rectangular box containing a handwritten signature in black ink. The signature is written in a cursive style and reads "John M. Grego".

John M. Grego, President