

**From:** Pate, Dusty H <Haigler\_Pate@nps.gov>  
**Sent:** Friday, August 28, 2020 12:01 PM  
**To:** WEC\_CFFF\_EIS Resource  
**Cc:** Berry, K Lynn; Shelley, David; West, Ben  
**Subject:** [External\_Sender] Docket ID NRC-2015-0039  
**Attachments:** NPS CONG WEC CFFF Ltr to NRC re NOI EIS Scoping 20200827.pdf

Please see the attached for comments regarding Docket ID NRC-2015-0039.

Thank you,

Haigler "Dusty" Pate  
Energy Specialist  
National Park Service  
Department of the Interior Region 2: South Atlantic-Gulf  
404-772-0637 cell

**Federal Register Notice:** 85FR46193  
**Comment Number:** 15

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# United States Department of the Interior



## NATIONAL PARK SERVICE

Atlanta Federal Center  
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IN REPLY REFER TO:  
I.A.2. (SERO-PC)

Jessie M. Quintero  
Acting Chief, Environmental Review Materials Branch  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

*Via Electronic Mail*

Re: Docket ID NRC-2015-0039

Dear Ms. Quintero:

I am writing to submit National Park Service (NPS) comments to the U.S. Nuclear Regulatory Commission (NRC) regarding a notice of intent (NOI) dated July 31, 2020, to prepare an environmental impact statement (EIS) and conduct a scoping process for Westinghouse Electric Company, LLC's (WEC) request to renew its operating license for the Columbia Fuel Fabrication Facility (CFFF) in Hopkins, SC.

The CFFF is located approximately four miles from Congaree National Park (CONG) and discharges permitted radiological and non-radiological waste into a stream that enters the Congaree River approximately one river mile upstream from the western boundary of CONG. Multiple high-profile incidents have allowed radiological contaminants (including uranium and technetium) and non-radiological contaminants (including volatile organic compounds and chlorinated volatile organic compounds such as tetrachloroethene and trichloroethene) into the surficial aquifer underneath the CFFF site. The leaks and groundwater contamination at the CFFF along with public concerns caused NRC to withdraw a June 2018 environmental assessment (EA) and finding of no significant impact (FONSI) and to determine that a subsequent draft EA compliance process required the preparation of an EIS.

NRC's draft EA published in October 2019 indicated that, "[d]ue to past releases, the uncertainty of the migration pathways for contamination, and because it is likely that there will be leaks and spills in the future, the NRC determined that there could be noticeable impacts to the soil, surface water, and groundwater." The draft EA went on to reach a preliminary conclusion that continued operations at the CFFF would not have a significant impact on the environment due to monitoring and mitigation by WEC, but the NOI documents the NRC's determination that it was not able to reach a FONSI for re-licensing of the CFFF.

Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi  
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands

Local geology and hydrology in the vicinity of the CFFF are highly complex and interconnected, and CONG provided relevant technical information to the NRC during the environmental review documented in the October 2019 draft EA. The NPS is concerned about the status and fate of previous releases, current uncertainty regarding migration pathways for contamination, and the likelihood of future leaks and spills. All of these have the potential to impact CONG resources and visitor experiences as well as the park's gateway community. The adjacent reach of the Congaree River is also listed on the Nationwide Rivers Inventory (NRI) administered by the NPS, resulting in similar concerns about potential impacts to the outstandingly remarkable values (ORVs) of the river.

Congaree National Park, established in 1976, "protects, studies, and interprets the resources, history, stories, and wilderness character of the nation's largest remaining tract of southern old-growth bottomland forest and its associated ecosystems." (CONG Foundation Document, 2014) The park's enabling legislation specifies that the Secretary of the Interior shall permit sport fishing on lands and waters at the park. (16 USC § 410jjj-2(b)) The park hosted 159,000+ visitors in 2019, and these visitors generated an estimated \$8.2 million for the local economy near the park. CONG has also been recognized for the superlative quality of its resources through multiple international, national, state, and local designations:

- The United Nations Educational, Scientific and Cultural Organization (UNESCO) has recognized the park as a Wetland of International Importance and an International Biosphere Reserve.
- The park encompasses over 15,000 acres of federally designated wilderness and has also been recognized as a National Natural Landmark and an Audubon Society Important Bird Area.
- The State of South Carolina has recognized park resources as Outstanding National Resource Waters, one of the Seven Wonders of South Carolina, and part of the COWASEE Basin Focus Area.

The area in and around CONG also contains significant cultural resources that span the long, rich, and complex arc of human history in the Southeastern United States. Archaeological sites, cultural traditions, and primary sources attest to the region's history including thousands of years of Native American habitation; Spanish and English exploration; English colonization; the Revolutionary War; Slavery in the Antebellum South; the Civil War; Reconstruction; the Jim Crow South; logging, steamboat, and railroad history; moonshining; and the modern era. Today the park works closely with many neighbors, stakeholders, and partners in the gateway community, many of whom are directly connected with those that previously inhabited and worked park lands. Additional information about CONG can be found at the links below:

- <https://www.nps.gov/cong>
- [https://www.nps.gov/cong/learn/management/upload/CONG\\_FD\\_SP.pdf](https://www.nps.gov/cong/learn/management/upload/CONG_FD_SP.pdf)

The NRI-listed reach of the Congaree River is a 45-mile stretch extending from the confluence with Congaree Creek to the confluence with the Wateree River. This reach, which flows past the CFFF before flowing past CONG, is a popular, scenic resource for recreational boating and fishing that has also been designated as a Blue Trail. The NPS administers the NRI as part of its

responsibilities under the Wild and Scenic Rivers Act (WSRA). NRI listings are potential candidates for inclusion in the Wild and Scenic Rivers System due to ORVs such as scenery, geology, wildlife, and recreational potential. Under WSRA Section 5(d)(1) and related guidance, all federal agencies must seek to avoid or mitigate actions that would adversely affect NRI rivers. The Congaree River is noted for its outstandingly remarkable scenic, recreational, geologic, fish, wildlife, historic, and cultural values.

The NPS is aware of several high-profile prior safety incidents and environmental releases at the WEC CFFF. There is currently significant uncertainty about the status, transport, and fate of subsurface contamination as it migrates through a highly interconnected hydrogeologic system; modeling and monitoring this contamination in such a complex system requires significant subsurface and surface data. These incidents and uncertainties—and the nature of the presently permitted discharge—raise concerns about potential impacts to CONG resources, including old-growth forests and freshwater fisheries, visitor experiences (e.g., safety and perceptions of wilderness), and the park’s gateway community. These concerns are compounded by the NRC’s statement in its 2019 draft EA that leaks and spills are likely to continue.

Based on the context given above, the NPS proposes five specific considerations for the current NRC scoping process:

1. Ensure that sampling, monitoring, modeling, and remediation of radiological and non-radiological contaminant plumes originating from the CFFF are undertaken by WEC with adequate spatial and temporal resolution for such a complex system. We suggest this will require integration of numerous surface monitoring sites, environmental borings, and groundwater monitoring sites such as nested piezometer arrays that extend well beyond present plume boundaries; sampling in the park under a research permit is welcome.
2. Ensure that a broader human health and ecological risk assessment—as well as detailed response planning for potential future releases—is undertaken by WEC and discussed in the EIS.
3. Ensure that: (a) the special international, national, state, and local designations of CONG (see list above), (b) the “shall provide access to sport fishing” clause from CONG’s enabling legislation, and (c) the Fundamental Resources and Values identified in the CONG foundation document are all specifically identified and any potential impacts addressed as applicable in the EIS.
4. Ensure that any potential impacts to the ORVs for which the Congaree River is designated are addressed in the EIS. This request is in accordance with an executive memorandum dated August 10, 1980, regarding interagency consultation to avoid or mitigate adverse effects on rivers in the NRI. Further information on consulting with the NPS regarding NRI rivers can be found at:  
<https://www.nps.gov/subjects/rivers/consultation-instructions.htm>.
5. Ensure that the NPS be included as a consulting party in the National Historic Preservation Act Section 106 process along with the South Carolina Department of Archives and History and affiliated, Federally recognized tribes on the undertaking.

We appreciate the opportunity to provide comments on the NOI for NRC's proposed re-licensing of the CFFF. Questions regarding these comments or NPS jurisdictional resources and expertise can be directed to David Shelley, CONG Chief of Resource Stewardship and Science, at 803-647-3966 or [david\\_shelley@nps.gov](mailto:david_shelley@nps.gov); or Dusty Pate, Regional Energy Specialist, at 404-772-0637 or [haigler\\_pate@nps.gov](mailto:haigler_pate@nps.gov).

Sincerely,

KAREN  
CUCURULLO

Digitally signed by  
KAREN CUCURULLO  
Date: 2020.08.27  
16:36:54 -04'00'

For Stan Austin  
Regional Director

cc: Dr. W. Eric Emerson, South Carolina Department of Archives and History  
Superintendent K. Lynn Berry, Congaree National Park