

**From:** Kim Bickford <bickfordk83@gmail.com>  
**Sent:** Sunday, August 30, 2020 1:43 PM  
**To:** WEC\_CFFF\_EIS Resource  
**Subject:** [External\_Sender] RE: Docket ID: NRC-2015-0039 / Scoping Comments for Preparation of the Draft Environmental Impact Statement as Part of the Relicensing Process for the Westinghouse Fuel Fabrication Facility, Hopkins, SC

Dear NRC, Sirs and Madams:

Please include this entire letter in the official record of the draft Environmental Impact Statement, EIS.

In light of the recent toxic spills, leaks, and dangerous incidents at Westinghouse Fuel Fabrication Facility (WFFF), and to preserve the right to be officially heard by the NRC regarding how the WFFF impacts our water, air, and soil, the WFFF should only be granted a 10-year license AFTER the WFFF successfully completes a 12-month trouble-free review period.

The following significant issues should be included by the NRC in its investigations and put into the EIS:

1. Land Use
2. Geology and Soils
3. Water Resources
4. Air Quality and Climate Change
5. Ecological Resources
6. Waste Management
7. Historical and Cultural Resources
8. Visual and Scenic Resources
9. Noise
10. Transportation
11. Accidents
12. Public and Occupational Health
13. Socio-economics
14. Environmental Justice

In fairness and in the urgency to “get this right” rather than just fast, please extend the official scoping comment period. The Westinghouse Fuel Fabrication Facility (WEC) has had too many serious and complex problems to not allow the public enough time to respond. I, all of us stakeholders, are suffering day to day through the COVID-19 and still care about our community. We need additional time.

The Proposed Action of renewing the license for WEC for a period of 40 years must be rejected. Instead, the EIS must favor the Alternative of a Ten Year renewal license.

The Nuclear Regulatory Commissions (NRC) and Westinghouse have met with and responded to community pressures only because there has been a relicensing process. Without that process

both NRC and Westinghouse will not be compelled to communicate in open dialogues and meetings with the entire community. One indication the process must happen every 10 years and not 40 is that both Westinghouse and NRC repeatedly broke promises to the community about improving communications. The public needs to provide input and receive feedback on a regular basis in order to hold Westinghouse and the NRC accountable for safety.

The draft EIS must include studies and analyses of all pathways for exposures to toxins, chemicals, and radioactivity at WEC. It also must list and report on the following measures: initial and continual training on safety, developing policies and procedures, and enforcement for workers, staff, and management. Then the EIS must analyze the effectiveness of those measures in reducing exposures to workers. Workers at WEC are exposed to higher levels of radioactivity than at other nuclear facilities in the United States.

The draft EIS must report data and an analyses on indoor air quality inside all WEC's buildings.

The draft EIS must include a report and analysis of all releases to the out-of-doors atmosphere. There are releases of fumes from processing materials, from incinerating materials, and from indoor ventilating systems. The type, amount of toxins and radioactive gases that move through the filters and enter the atmosphere daily need to be included. Effects of these toxins and radioactive releases on the respiratory system and other body organs should also be part of the report.

The draft EIS must include a complete study about the different underground plumes of toxic uranium, technetium-99, PCE, and TCE. Their levels in the groundwater are above drinking water standards, and various plumes continue to move through and contaminate the soils and the groundwater. The EIS must include where each plume starts; the amount of each toxic material entering the plumes each day; the locations on the property; the size, depth, and growth or decrease of each plume; and the concentrations of U, Tc-99, PCE, and TCE in the plumes.

Groundwater moves and can exchange contents with surface water, with deeper aquifers, soils, and plants. Eventually, if these plumes are not stopped or mitigated, these pollutants will migrate off the Westinghouse property eventually, affecting the ecosystems and habitats downstream and downgradient.

The EIS must include the various short- and long-term effects of exposures to these elements on animals and humans. Technetium-99 and the different forms of uranium emit radiation for thousands of years before these elements become safe. Technetium-99 when inhaled or ingested often becomes located in the thyroid gland.

The presence of these elements in vegetation and then, in the meat of fish and game can have an impact of people who hunt and fish for food. These are hard times, and more people than ever are fishing, even from Mill Creek and the Congaree River.

The EIS must include data about fish caught in the Congaree River where WEC discharges its wastewater. Both uranium and technetium have been found in fish. Which types of fish, what sizes of fish, how many fish are caught and tested, how often the testing is done, whether or not

there are apparent effects on the fish all need to be included in the EIS.

Concerning waste and incidental discoveries of contamination, the draft EIS must not be concluded but remain open until the DHEC-Westinghouse clean-up and remediation plan for the lagoons leaking contaminants into the soil and groundwater is completed. The results of that plan at completion will need to be entered into the draft EIS for additional comment. The present license for WEC is good until 2026, and the schedule for completion of the DHEC-WEC plan is well within that span of time.

The draft EIS should include an evacuation plan for the community and the means to communicate that information to all residents, businesses, schools, and houses of worship within a 15-mile radius of the WEC. The EIS must consider a variety of means to alert residents, businesses, etc. of the Lower Richland community, as they do not have broadband; phone service is spotty; and very few people order a local newspaper. Evacuation route signs must be posted and made easily accessible throughout the Lower Richland area.

Residents and guests within 5 to 10 miles of the WEC are the ones who would suffer the greatest losses should there be damage directly to people and to crops, fish, and air from pollutants and from any major emergency. This is an environmental justice community which is a fenceline area for other polluters – International Paper, a toxic landfill, Wateree Coal-Fired Power Plant--to name 3. Effects on health from emissions from all sources can be cumulative and serious. The EIS must account for the cumulative health effects of all the sources of air, water, and soil pollution on the population.

The draft EIS must explain how Westinghouse handles waste, air emissions, water discharges, and even unreported yet known or possible leaks from the Wes Dyne company operating at WEC.

WesDyne, a Westinghouse subsidiary, makes and/or assembles Tritium Producing Burnable Absorber Rods (TPBARs) at the Westinghouse site. The NRC-regulated rods are shipped to Tennessee where they are inserted into the NRC-licensed Watts Bar unit 1 commercial reactor and irradiated in order to produce radioactive tritium gas. The irradiated rods are then shipped to DOE's Savannah River Site in South Carolina where the tritium is extracted and placed in small reservoirs that are inserted into all US nuclear weapons.

Data on Wes Dyne's material intakes, emissions, discharges, and wastes, which may also impact the human and natural environment of Lower Richland, need to be accounted for and analyzed as part of the EIS. Whether both companies use the same discharge points or each has its own into the waters of the state is of vital importance. Wes Dyne's inclusion in the same or different safety and security plan and whether or not there are connections to WEC operations need to be part of the EIS picture, especially if the NRC is responsible for regulation of Wes Dyne's operations on the same campus.

Thank you for accepting all my comments and for placing this letter in its entirety into the official record.

Sincerely,

Kimberly Bickford  
Eastover, South Carolina

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