

**From:** Priscilla Preston <priscilla.preston@alumni.unc.edu>  
**Sent:** Wednesday, September 9, 2020 12:37 PM  
**To:** WEC\_CFFF\_EIS Resource  
**Subject:** [External\_Sender] Comments on NRC's Scoping Related to Preparation of an EIS on the Westinghouse Fuel Plant - Docket ID NRC-2015- 0039

To Office of Administration U.S. Nuclear Regulatory Commission :

Comments on the U.S. Nuclear Regulatory Commission's Scoping Related to Preparation of an Environmental Impact Statement on the Westinghouse Fuel Plant in Richland County, South Carolina - Docket ID NRC-2015- 0039

I hereby submit these comments for the record of the scoping for the preparation of an Environmental Impact Statement related to the review of the request by Westinghouse Electric Company, LLC's (WEC) to renew its operating license for its Columbia Fuel Fabrication Facility (CFFF) located near Columbia, South Carolina. All of these comments are for the record and must be included in a scoping comment summary and responded to in any draft EIS that might be prepared.

Given the brevity of the scoping comment period and the inexplicable lack of a scoping meeting, Columbia Friends (Quakers) signed on to an August 10, 2020 letter spearheaded by the Sierra Club asking for a 90-day extension of the comment period. As of the submission of these comments on September 8, 2020, the request was denied. I hereby complain about the denial by the NRC.

Given the seriousness of the matter at hand and chronic problems with soil and groundwater contamination and on-going concerns with operations of the Westinghouse facility, it is very unclear how dates for issuance of the final EIS, issuance of a Record of Decision and a license-extension determination can be made according to a schedule fixed over a year in advance. In preparing the draft EIS and reviewing information from the NRC, Westinghouse and the South Carolina Department of Health and Environmental Control, it is unknown if new and important information will be revealed that would impact the schedule and decision-making process. It appears that the NRC has assumed the EIS will be a pro forma matter and that the schedule will likely not be impacted.

There are multiple issues of concern. One is the radiation doses of the workers at Westinghouse Electric Co. Columbia nuclear fuel plant. According to NRC's report on occupational radiation exposure at NRC-licensed facilities in 2018, the workers receiving the highest individual doses in the U.S. nuclear fuel industry are those employed at Westinghouse Electric Co.'s Columbia nuclear fuel plant. This situation requires immediate attention.

Another major concern is the relationship of Westinghouse to nuclear weapons production. A part of the Westinghouse facility, operated by subsidy WesDyne, makes tritium rods that are irradiated in the TVA Watts Bar unit 1 reactor - and perhaps soon in unit 2. The highly radioactive irradiated rods are taken to DOE's Savannah River Site, where radioactive tritium gas is removed and placed into small reservoirs for insertion into US nuclear weapons. Tritium

gas is used during detonation of a nuclear warhead to boost the explosive power of the device. The unirradiated Tritium-Producing Burnable Absorber Rods (TPBARs) assembled at the Westinghouse /WesDyne facility don't contain nuclear materials but it is unknown what waste may be generated during their fabrication and how those waste are managed and if they are transferred to overall Westinghouse facility waste-management operations. It is also unknown if WesDyne staff are on the Westinghouse payroll or work on the Westinghouse side of operations. Likewise, it is unknown if WesDyne uses the same water and sewer systems as the overall Westinghouse facility, thus impacting disposal operations. This must be discussed in the draft EIS. The NRC claims it doesn't regulate the WesDyne facility as it is a nuclear weapons facility under the oversight of DOE's National Nuclear Security Administration but no documentation to that effect has been released by the NRC or the NNSA. The relationship of WesDyne operations to the uranium fuel side of the facility is unknown and must be revealed. As NNSA is not a regulatory agency which government entity regulates WesDyne operations and waste management activities? The draft EIS must clarify this matter. Considering the on-going health and environmental concerns as well as WesDyne's support of Department of Defense's (DOD) nuclear weapons stockpile mission, the license for the Westinghouse facility has not been justified by the NRC to be extended for 40 years. The NRC must hold the draft EIS open and require that the company show it can operate the facility for a period of one year without any problems that might impact public health and safety. After a trouble-free one-year period of time, the draft EIS should be revised and opened again for comment. If Westinghouse cannot operate without contributing to the harm of its workers and the environment or clarify its role in contributing to the nuclear weapons stockpile, it should not continue to operate. This concludes my scoping comments. Thank you for consideration of them.

Sincerely,

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