

**From:** [Wiehle, Kelly L](#)  
**To:** [Trefethen, Jean](#)  
**Cc:** [Coflin, Monika](#); [Faraz, Yawar](#)  
**Subject:** [External\_Sender] RE: NRC Clarifications Requested -- Environmental Report  
**Date:** Wednesday, January 13, 2021 10:48:27 AM  
**Attachments:** [image001.png](#)

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The scope of the HALEU Demonstration Program (3-year) does not cover shipping product offsite other than samples. The DOE-owned product will be stored in a safety compliant container within ACO's NRC licensed and regulated facility in Piketon, Ohio. The specifics of this NRC-approved area within the ACO footprint would not be public releasable information, but is described in the Security Plan(s).

Plans for the extended operation of the HALEU cascade remains under negotiations to determine future ownership and liability; therefore, the product under the extended operation will again be stored in a safety compliant container within ACO's NRC licensed and regulated facility in Piketon, Ohio. NRC approval of a future license amendment request for ACO's proposed packaging and transportation plans would be needed before offsite product shipments would be authorized.

Please let me know if you need anything further related to this question.

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**From:** Trefethen, Jean <Jean.Trefethen@nrc.gov>  
**Sent:** Wednesday, January 6, 2021 4:56 PM  
**To:** Wiehle, Kelly L <wiehlekl@centrusenergy.com>  
**Cc:** Coflin, Monika <Monika.Coflin@nrc.gov>; Faraz, Yawar <Yawar.Faraz@nrc.gov>  
**Subject:** RE: NRC Clarifications Requested -- Environmental Report

**[EXTERNAL EMAIL]**

Hello Kelly,  
During the call we discussed shipping product. The purple text below is what we have in the response, is the last sentence (highlighted in yellow) accurate? If not could you correct the text and we will finalize these notes for our reference.

Thank you!

When does Centrus anticipate shipping product to a fuel manufacturing facility? **Not until after the fuel manufacturing facility is made available. Before they can ship, Centrus will need packaging and transportation qualification if the fuel manufacturing facility is located offsite. Until then, the product will be stored in an NRC-licensed container that is owned by DOE**

*Jean Trefethen*

Environmental Project Manager  
U.S. Nuclear Regulatory Commission  
301-415-0867



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**From:** Wiehle, Kelly L <[wiehlekl@centrusenergy.com](mailto:wiehlekl@centrusenergy.com)>  
**Sent:** Wednesday, January 06, 2021 4:45 PM  
**To:** Trefethen, Jean <[Jean.Trefethen@nrc.gov](mailto:Jean.Trefethen@nrc.gov)>  
**Cc:** Faraz, Yawar <[Yawar.Faraz@nrc.gov](mailto:Yawar.Faraz@nrc.gov)>; Coflin, Monika <[Monika.Coflin@nrc.gov](mailto:Monika.Coflin@nrc.gov)>  
**Subject:** [External\_Sender] NRC Clarifications Requested -- Environmental Report  
**Importance:** High

Jean,

Based upon the history of the Lead Cascade Request for Disposals (RFD) and/or shipments of hazardous waste, our most conservative estimate is one 55-gallon drum of hazardous waste during the HALEU Demonstration Program (3-year period) and two 55-gallon drums of hazardous waste annually during the potential continued 10-year period of operations. These estimates would not cover an unanticipated calamity type situation.

These conservative estimates would keep ACO in the Very Small Quantity Generator (generate < 220 lbs. hazardous waste per month) category with the Environmental Protection Agency, though we will continue to follow the guidance of a Large Quantity Generator (generate > 2,200 lbs. of hazardous waste per month), much like we did during Lead Cascade operations.

Please let me know if you would like to see the Lead Cascade history behind this information.

Kelly