



ILLINOIS EMERGENCY MANAGEMENT AGENCY

JB Pritzker
Governor

Alicia Tate-Nadeau
Director

June 4, 2021

John McKirgan, Chief
Storage and Transportation Licensing Branch
Division of Fuel Management
Office of Nuclear Material Safety and Safeguards
U.S Nuclear Regulatory Commission
Washington, DC 20555

Subject: REVIEW OF THE DRAFT ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT FOR THE MORRIS OPERATION DECOMMISSIONING FUNDING PLANS

Dear Mr. McKirgan:

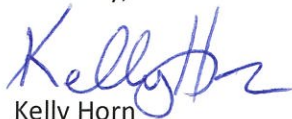
The Illinois Emergency Management Agency (IEMA/Agency) appreciates the U.S. Nuclear Regulatory Commission (NRC) providing our Agency the opportunity to review and comment on the Draft Environmental Assessment and Finding of No Significant Impact for the Morris Operation Decommissioning Funding Plan (EA). IEMA reviewed both the EA and the GE Hitachi Nuclear Energy Americas, LLC, Morris Operation, Independent Spent Fuel Storage Installation, Decommissioning Funding Plan, Revision 4 (DFP) to determine potential impacts to the state of Illinois. As such, IEMA would like to make the following comments:

- The DFP, as presented, lacks an estimation for the total volume of low-level radioactive waste (LLRW) to be generated during the decommissioning process. Therefore, is not clear to IEMA how GE Hitachi determined an estimated cost associated with transportation and disposal of LLRW.
- Section 13 of the Illinois Low-Level Radioactive Waste Management Act establishes a fee schedule for LLRW generated within Illinois. Because the DFP lacks granularity, IEMA is unable to determine if GE Hitachi has included an estimated cost associated with LLRW fees to be assessed by the IEMA.

In general, IEMA believes the EA and DFP to be sufficient in context; however, until the NRC provides IEMA with clarification to our comments, we cannot concur with the NRC's Finding of No Significant Impact.

Again, IEMA would like to thank the NRC for the opportunity to review and provide comment on the EA and DFP for the GE Hitachi Morris Facility. We look forward to working with you on the resolution of our comments in order to achieve our common goal – the health and safety of the public and the environment through the safe and secure use of radioactive material.

Sincerely,



Kelly Horn

Head of Environmental Management
Division of Nuclear Safety
Illinois Emergency Management Agency

Cc: Kristina Banovac/ NRC
Adnan G Khayyat/ IEMA