

From: Rick Lee <writer@comporium.net>
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To: WEC_CFFF_EIS Resource
Subject: [External_Sender] Comments on Docket ID NRC-2015-0039
Attachments: Letter to NRC on Westinghouse license application - Final.pdf

Please find our comments attached. Thank you for the opportunity to be a part of the process.

Rick Lee
Chairman
Nuclear Advisory Council

Federal Register Notice: 86FR43277
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Attn: Program Management, Announcements and Editing Staff

RE: Docket ID NRC-2015-0039

Subject: **Westinghouse Columbia Nuclear Fuels Facility License Renewal
Application Public Comment Submittal**

Dear Sirs:

The South Carolina Governor's Nuclear Advisory Council (GNAC) held its semi-annual meeting on October 18, 2021, in the Gressett Building at the South Carolina Capitol in Columbia, S.C. At the meeting we received a thorough briefing from Mr. Mike Annacone, Vice-President – Columbia Nuclear Fuel Operations, regarding the progress Westinghouse has made in their efforts to address environmental issues at their site arising from these many years of operations. This was not the first time that we have called Westinghouse before the Council to report on the status of their site and operations. They have provided updates on progress of their environmental projects at three previous meetings. Members of GNAC have conducted multiple visits to the Westinghouse site and visually inspected the plant, sample wells, holding ponds and other portions of the grounds. We have regularly been briefed on the schedules and work activities Westinghouse has used to address process and environmental challenges. Members of GNAC participate in the Westinghouse stake holder meetings. We have had unfettered access to incident reports, updates on investments and site access anytime requested. Westinghouse has been fully transparent with the GNAC.

Following the briefing we received from Westinghouse on October 18, 2021, GNAC entered discussions regarding the relicensing of the project. It is our understanding that there is a lot of discussion within some special interest groups regarding whether the license renewal should be 20 years or 40 years in length. These groups advocate for a 20-year license and argue that it is the best method to ensure Westinghouse stays focused on environmental or operational issues. The advocates are concerned that there will be no regulatory oversight and inspections for compliance by the NRC to address problems which might arise from operations if a 40 year relicense is granted. In our discussions we concluded that such a position ignores the regular inspections performed by the NRC on facilities and operations. Their position also fails to acknowledge the actions by the S.C. Department of Health and Environmental Control (DHEC) regarding environmental compliance throughout the grounds and plant. The inspections and monitoring of Westinghouse operations by the NRC and DHEC are not dependent on the length of the relicensing from the NRC. Both regulatory organizations conduct scheduled and unscheduled inspections as well as respond to incidents. It is our understanding that the NRC and DHEC each have authority to issue cure or stop work notices should conditions warrant. Between the two organizations, all activities on the Westinghouse site are subject to regular inspections by regulatory personnel.

As to the duration of the license issued by the NRC, GNAC is very familiar with the long-term nature of the nuclear industry and the many years that reactor fuel is ordered in advance of actual need. Westinghouse is an important part of the nuclear energy community in South Carolina and throughout the US serving as a major supplier of reactor fuel. Because nuclear reactors schedule their refueling outages and delivery of new fuel rods many years in advance of actual due dates, we are concerned that a 20-year license will create uncertainty regarding Westinghouse's ability to meet those long term commitments. We can well imagine a scenario around years 12-15 wherein the possibility of a 20-year license not being renewed creates uncertainty regarding delivery of fuel and causes customers to purchase fuel from other suppliers resulting in a wind down of the current Westinghouse facility.

During our discussions we noted the following. Westinghouse:

1. Is executing a full EIS, as directed by the NRC and advocated by DHEC, to meet NEPA standards, including extensive modeling and investigation. Such a study will completely address the environmental concerns being advanced by others who are in favor of a shortened license period.
2. Completed the removal of all shipping containers containing uranium bearing materials
3. Completed the remediation and closure of the East Lagoon.
4. Installed additional wells on the grounds to monitor subsurface conditions

5. Formed a community stakeholder group complete with regular site meetings and a newsletter
6. Submitted a request to the NRC to include several conditions in the renewed license that ensure sustainability of programmatic improvements that have been made, resulting in reduced risk of future operations.
7. Has maintained a transparent relationship with GNAC, DHEC and the citizens group
8. Has moved ahead with the remediation of the Sanitary Lagoon well ahead of receiving directions from regulators to do so
9. Is investing significantly in upgrading and modernizing the facilities
10. DHEC has regularly affirmed the absolute cooperation they have received from Westinghouse including data, schedules, compliance with DHEC requests and the performance of activities by Westinghouse above and in advance of requirements.
11. Changed processes within the plant to eliminate the use of certain hazardous chemicals as a means of eliminating potential problems in the future

Following our discussion, a motion was made and unanimously approved that if the NRC chooses to relicense the Westinghouse facility, we urge a 40 year license be awarded to Westinghouse for the reasons noted above. We fully acknowledge that the decision rests exclusively with the NRC. However, in light of advocacy for the shorter-term permit by special interest groups, we felt compelled to participate in your comment period and represent the State of South Carolina, the 1100 employees at site and speak favorably about the efforts Westinghouse has made to prepare their site and plant for the future.

Very truly yours,



Rick Lee
Chairman
S.C. Governor's Nuclear Advisory Council

cc:
Governor Henry McMaster
Governor of the State of South Carolina