

From: tvolskay@gmail.com
Sent: Thursday, November 18, 2021 12:11 PM
To: WEC_CFFF_EIS Resource
Subject: [External_Sender] Public Comment by LWVSC: Docket No. NRC-2015-0039
Attachments: 11-18-2021 LWVSC Correspondence Docket ID NRC-2015-0039.pdf

Nuclear Regulatory Commission,

On behalf of the League of Women Voters of South Carolina, please find attached comments pertaining to proposed relicensing of the Westinghouse Electric Company Columbia Fuel Fabrication Facility; Docket No. NRC-2015-0039.

Ted Volskay
Co-Chair Environmental Working Group

Federal Register Notice: 86FR43277
Comment Number: 26

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U.S. Nuclear Regulatory Commission

Re: Westinghouse Electric Company, LLC
Columbia South Carolina Fuel Fabrication Facility License Renewal Application
Docket ID NRC-2015-0039

The Westinghouse Electric Company (WEC) is in the process of renewing their license to continue operation of its Columbia Fuel Fabrication Facility (CFFF) for an additional 40 years. The League of Women Voters of South Carolina (LWVSC) recommends renewal of the WEC license to operate the CFFF for 10 years.

The LWVSC has been at the forefront of efforts to protect SCs air, land and water resources. Extensive documentation including a September 17, 2021 letter from the U.S. Department of the Interior (DOI) to the U.S. Nuclear Regulatory Commission (NRC) indicates that the WEC CFFF has a history of uncontrolled releases of radioactive and non-radioactive hazardous wastes into the environment ([main.jsp](#) ([nrc.gov](#))). Statements, concerns and a recommendation from the letter include:

- There have been “multiple leaks or spills that have resulted in subsurface contamination at the CFFF site since the last license renewal”.
- “Investigations of subsurface contamination from past events have not been definitive in identifying the sources of contaminants, the initiation of contaminant releases, and the total amounts of contaminants released to the environment.”
- “The methods by which the groundwater quality objectives of the consent agreement will be met are unknown.”
- DOI is concerned that an existing subsurface contamination plume from the CFFF could have potential impacts to Congaree National Park (CONG) and the Congaree River.
- DOI recommends a license alternative less than 40-years which would allow for an examination for potential relicensing and evaluation of environmental impacts over a shorter span of time.

In addition to concerns expressed by the DOI, the LWVSC is concerned that historical and possibly ongoing releases of hazardous materials from the CFFF will compromise groundwater quality in South Carolina’s Coastal Plain aquifer system. The CFFF is located southeast of the “fall line” (see attachment). The fall line separates the crystalline rocks of the piedmont from the sedimentary formations of the Coastal Plain. Groundwaters southeast and in close proximity of the SC fall line recharge

groundwater in the Lower Coastal Plain aquifer system (Aucott). The SC Upper and Lower Coastal Plain aquifer systems are the source of potable water for millions of South Carolinians.

Releases of hazardous contaminants from the CFFF are preventable and therefore unacceptable. Likewise, effective measures to remediate soil and groundwater impacted by historical releases should be prioritized. Limiting the CFFF operating license to 10-years may incentivize WEC to become better stewards of SCs environment and natural resources.

Sincerely,

League of Women Voters of South Carolina

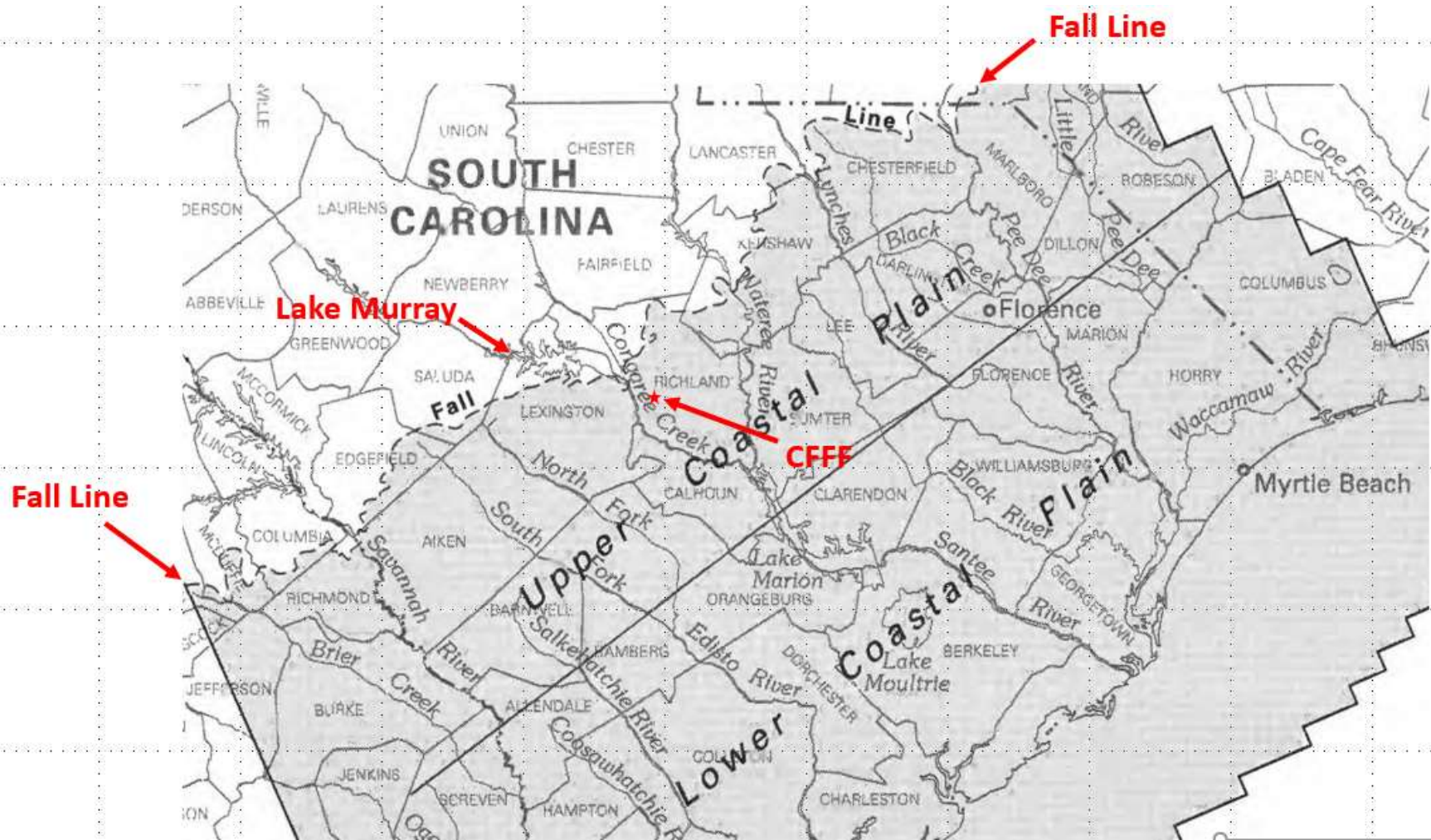
Nancy Williams, President
president.lwvsc@gmail.com

Submitted via E-mail to WEC_CFFF_EIS@nrc.gov

cc: LWVSC Issues & Action
LWVSC Environmental Working Group
League of Women Voters of Horry County

Attachment: Location of Carolina Fuel Fabrication Facility Relative to Fall Line

ATTACHMENT: LOCATION OF CAROLINA FUEL FABRICATION FACILITY RELATIVE TO FALL LINE



Source: *Hydrology of the Southeastern Coastal Plain Aquifer System in South Carolina and Parts of Georgia and North Carolina*

By Walter R. Aucott

U.S. Geological Survey Professional Paper 1410-E