

From: Priscilla Preston <priscilla.preston@alumni.unc.edu>
Sent: Friday, November 19, 2021 3:49 PM
To: WEC_CFFF_EIS Resource
Subject: [External_Sender] Midlands Group of the South Carolina Sierra Club
comment on Draft EIS for WFFF license renewal
Attachments: MidlandsGroup_Comments.docx

Ms. Diana Diaz-Toro
Office of Administration,
Mail Stop: TWFN-7-A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001,
ATTN: Program Management,
Announcements and Editing Staff.
WEC_CFFF_EIS@nrc.gov

RE: Comments of Midlands Group of the South Carolina Sierra Club on the Draft EIS on 40-Year License Extension Request for the Westinghouse Electric Company, LLC; Columbia Fuel Fabrication Facility

Dear Ms. Diaz-Toro:

The Midlands Group of the South Carolina Sierra Club does not support the 40-Year License Extension Request for the Westinghouse Columbia Fuel Fabrication Facility. Both Westinghouse and the Nuclear Regulatory Commission (NRC) have been unable to prevent and remediate existing pollution from the site during the current license period. Granting such a long license is not in the best interests of the Environmental Justice (EJ) community in which Westinghouse is located and is a concern throughout the Midlands area. The existing NRC license failed to prevent extensive radioactive and hazardous pollution by the Westinghouse Nuclear Fuel Fabrication Facility over the last 50 years which threatens air quality, groundwater and surface water quality including the waters of Mill Creek which flows through the site and into the Congaree River. Under the existing license the NRC has failed to exercise sufficient oversight to prevent and remedy pollution discharges and violations by Westinghouse.

Only through action by the local State authorities- South Carolina Department of Health and Environmental Control (SCDHEC) - as recently as 2019, did Westinghouse disclose extensive radioactive and toxic contamination of groundwater at the site and sediments at the bottom of Mill Creek which flows to the Congaree River. Such sediment contamination includes radioactive Uranium and Technetium 99. Uranium may lead to thyroid problems, leukemia and infertility and other health conditions. Technetium-99 affects the thyroid and digestive system when inhaled or swallowed in foods. The sources of such pollution remain unidentified and its extent and remediation remain incomplete. No new license should be approved until such historic pollution has been cleaned up and full corrective action to prevent future pollution has been

implemented.

The NRC and Westinghouse have failed to comply with Environmental Justice regulatory requirements. While acknowledging that the Westinghouse Nuclear Fuel Fabrication Facility is sited in a predominately African American, low income and minority residential community with numerous additional sources of environmental hazards including an adjacent Superfund Hazardous Waste Site and the nearby Wateree coal-fired power plant, NRC and Westinghouse have failed to properly address the disproportionate and harmful impacts of future facility operations on the EJ community, including the cumulative and synergistic impacts of other sources. Furthermore, the NRC and Westinghouse have failed to properly assess the heightened impacts of facility pollution on subsistence hunting and fishing by members of the EJ community in areas adjacent to the facility boundaries. Over the last 50 years of facility operations the NRC and Westinghouse have failed to effectively engage the local EJ community to facilitate effective understanding of facility operations and impacts and effective public participation in facility regulation and emergency preparedness and response. Only very recently has the NRC and Westinghouse embarked on public relations gestures. We appreciate these gestures but the results of such efforts are not yet clear.

We support the comments made by others concerning the cultural and archaeological resources. We request an extension of the comment period deadline until after the Intensive Archaeological Survey of Westinghouse Fuel Fabrication Facility (WFFF) is completed and reviewed by the State Historic Preservation Office (SHPO) and made available to the public for review. We request an expansion of the Area of Potential Effect (APE) to include significant ancestral sites of the local Native American populations including the Pine Hill Tribe. We ask that WFFF discontinue the installation of test wells in proximity to Denley Cemetery, a historic African American (and possibly Native American) cemetery. We request that all ground disturbances at WFFF should be monitored by a professional archaeologist.

We are concerned that WESDYNE, LLC (Westinghouse Government Services), operates at the same Westinghouse site and fabricates Tritium Producing Burnable Absorber Rods (TPBARS) for transport to Tennessee Valley Authority (TVA) where they are irradiated and subsequently transported to Savannah River Site (SRS) where the tritium gas is extracted for use in nuclear warheads. The waste emissions from WESDYNE/Westinghouse Government Services are co-mingled with those of Westinghouse. NRC is claiming that it does not regulate the facility and therefore does not mention it in the EIS. The SC Department of Health and Environmental Control says it has issued no permits to the facility and that waste goes to the fuel plant which is regulated by NRC. That results in ambiguity about who is regulating the wastes from the facility. More importantly, the site is being used as a dual-use commercial-nuclear weapons facility.

Considering all of the above, we request the No Action alternative until all of the problems stated can be resolved.

Sincerely,

Priscilla Preston,
Chair, Midlands Group, South Carolina Sierra Club

Comments attached

Federal Register Notice: 86FR43277
Comment Number: 35

Mail Envelope Properties (CAE2S54LoZq2yrREzk3LDHwZVfdQyADywwZs-27FqwOJ49hdqGw)

Subject: [External_Sender] Midlands Group of the South Carolina Sierra Club comment on Draft EIS for WFFF license renewal
Sent Date: 11/19/2021 3:48:47 PM
Received Date: 11/19/2021 3:49:32 PM
From: Priscilla Preston

Created By: priscilla.preston@alumni.unc.edu

Recipients:
"WEC_CFFF_EIS Resource" <WEC_CFFF_EIS.Resource@nrc.gov>
Tracking Status: None

Post Office: mail.gmail.com

Files	Size	Date & Time
MESSAGE	5750	11/19/2021 3:49:32 PM
MidlandsGroup_Comments.docx		32501

Options
Priority: Normal
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:

November 16, 2021

Diana Diaz-Toro
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