

From: Robert Reese <rreese4@bellsouth.net>
Sent: Friday, November 19, 2021 5:43 PM
To: WEC_CFFF_EIS Resource
Cc: Karen Irick; Mary Kirkland; Woods Felicia - Columbia SC; Robert Reese
Subject: [External_Sender] Response to draft EIS - Westinghouse Columbia Fuel Fabrication Facility (CFFF)
Attachments: NRC Response.pdf

The attached response to the draft EIS regarding the Westinghouse Columbia Fuel Fabrication Facility is from residents of the directly affected community, and our response includes data from a community survey that depicts the sentiments of a large swathe of residents in the impacted community.

Please keep us informed about any decisions regarding this draft. We thank you for allowing our voices to be heard, and we are hopeful that our voice matters.

from.....

A group of concerned citizens

Robert Reese
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From: Robert Reese

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RE: Environmental Impact Statement for the License Renewal of the Columbia Fuel Fabrication Facility
in Richland County, South Carolina

DATE: 11/19/2021

FROM: Residents of the Directly Affected Parties
Karen Irick, Mary Kirkland, Robert Reese, and Felicia Woods

As you review all public comments received and make preparation to develop the final Environmental Impact Statement (EIS) concerning the Westinghouse Columbia Fuel Fabrication Facility (CFFF) in Richland County, South Carolina, we, the undersigned, respectfully submit a collective commentary, and hereby, request that you consider with due diligence, the most pressing concerns of the directly affected parties: safety, environmental justice, and historical preservation.

Additionally, we request the inclusion of the safety review in the February 2022 Draft EIS for public comment. Moreover, if the safety review is not completed at such time, we ask that a final decision not be made until the safety review is completed and gone through the public comment process.

During the August 26, 2021, NRC Public Meeting on the Draft Environmental Impact Statement for the License Renewal of the CFFF, NRC staff heard support from the community for the No-Action Alternative as well as the 20 Year Alternative. There was also a discussion about a 10 Year Alternative. However, it was clear there was no support for the 40 Year renewal.

Because the Commission has approved license terms for less than 40 years on a case-by-case basis where there are concerns about safety risk to the facility or where a licensee introduces a new process or technology, we support the approval of the 20 Year Alternative.

Moreover, 87% of respondents to the Lower Richland Area (LRA) Westinghouse Electric Corporation (WEC) Perception Survey supported the 20- or 10-Year Alternative, and conversely, only 13% of our neighbors supported the 40 Year renewal option. This survey also revealed 59% of the directly affected parties, and 39% of the community-at-large believes WEC causes cancer, whether it is through groundwater contamination or through the air.

Environmental protection and groundwater contamination has been an issue at the Westinghouse CFFF for years. The effects on the environment from the 2015 historic flooding event and multiple leaks or spills that have resulted in the contamination of the subsurface at the CFFF and an injured workforce are all of great concern to us and our community.

Over the course of the past several years, there have been frequent and numerous events that injured or put workers in danger. In fact, the EIS was issued because of the plant's poor handling of accidents and issues that came to light after the NRC issued a draft EA and FONSI in June 2018. Less than a month after issuing the draft Environmental Assessment and FONSI in June

2018, a leak at Hydrofluoric Acid Spiking Station #2 released uranyl nitrate and hydrofluoric acid into the soil, an incident that further raised concerns about WEC's environmental and safety record.

WEC's initial response to the report of this incident also raised alarms; they planned to monitor any COPC (Constituents of Potential Concern) migration using an existing monitoring well 190 feet away from the site; at typical rates of groundwater flow, contamination would not be detected for over a year. Fortunately, South Carolina Department of Health and Environmental Controls (SCDHEC) requested a more aggressive sampling plan.

Leaks including radionuclides from a contaminated wastewater line in 2008 and 2011 were not reported at the time they occurred. The 2011 incident is particularly concerning because WEC at that time was petitioning SCDHEC to decommission air sparging and soil vapor extraction onsite and was granted relief.

In 2019, another incident raised questions about management decisions. During a May 2019 inspection, SCDHEC found numerous intermodal containers containing storage barrels that had not been previously reported. Some of these intermodal containers and the barrels stored therein were not well maintained, and contamination was found on-site. Further, these containers, designed only for temporary storage, had been used for storage for up to 14 years. Though this incident appeared in the original Environmental Assessment, WEC's failure to disclose the site and existing contamination showed lack of attention to proper site management and disclosure.

While workforce training may not be under the purview of the NRC and therefore bears no discussion in the EIS, other than cultural resource training, please consider a trained workforce would keep the plant and the community safe.

In addition to workforce safety concerns, we – the directly affect party – understand that our biggest concern is the natural and cultural environments. The Wetlands adjacent to the facility are subject to considerable contamination. Our water table, rivers and creeks are at risk substantial risk. Our wetlands are dwindling away and cannot be replaced, and the plants sits adjacent to the only National Park in the entire state – the Congaree Swamp – our communities most prized ecological asset.

The WEC property was home to the Congaree Indian Tribe, of which very little historic information remains. Their villages are thought to be in the area and our knowledge of them could be greatly augmented by archaeological research. Hernando De Soto also journeyed through the region in A.D. 1540 before visiting the Native American towns of Aymay (at the junction of the Congaree and Wateree Rivers) and Cofitachequi (near Camden on the Wateree River). Any sites with preserved Spanish components would be greatly beneficial to our understanding of European exploration of the area. The South Carolina State Historic Preservation Office (SHPO) has asserted that the WEC site has high likelihood for the presence of significant archaeological properties.

The local community believes that the Area of Potential Effect (APE) should be expanded to include archaeological site 38RD4 (Green Hill Mound). This site is an important archaeological resource, Native American cemetery, and has traditional significance for local Native American groups, including the Pine Hill Tribe.

The APE includes the Denley Cemetery. This cemetery contains the remains of African American and, potentially, Native American interments. In rural South Carolina historic cemeteries, lower status individuals were buried in unmarked graves around the margins of a core family plot. Considering this pattern, the Denley Cemetery likely includes unmarked interments outside of the area set aside for the cemetery. Consequently, we encourage the NRC to use remote-sensing and/or penetrometer testing to identify the actual boundaries of the resource before ground disturbance re-commences.

We write this e-mail, asking the NRC to consider extending the Environmental Assessment license for no more than 20 years, instead of 40 years proposed to the WEC Fuel Fabrication facility in Hopkins, SC. There have been several incidents at the plant recently (problem with a scrubber, drum fire, spiking station issues). WEC has a long history of repeated violations of safety and negative environmental impacts for residents in the Lower Richland Community. The workforce deserves the highest quality of safety standards and a 20 year license holds the plant management to a more stringent criteria for safety protocol.

Since the EIS consistently uses the word “uncertainty”, we – the directly affected party - ask that you quantify Small, Medium, and Large from a risk standpoint to include the margin of error. Our community has been affected by environmental injustices from a variety of corporate entities. Our pristine ecosystem is threatened by the smallest changes in its biological makeup, and the NCR licensing process is one way for this rural community to enlist regulatory assistance to address environmental and workforce safety needs.