

**UNIVERSITY OF MISSOURI PICKARD HALL
DECOMMISSIONING PLAN LICENSE AMENDMENT
REQUEST FOR ADDITIONAL INFORMATION**

By letter dated May 25, 2023, the Curators of the University of Missouri (the licensee) submitted a license amendment request for an amendment to License No. 24-00513-32 for the University of Missouri Pickard Hall Decommissioning Plan. This request for additional information (RAI) identifies information needed by the U.S. Nuclear Regulatory Commission (NRC) staff in connection with its environmental review of the amendment application. Each individual RAI describes information needed by the staff for it to complete its review of the application and to determine whether the applicant has demonstrated compliance with the regulatory requirements.

The U.S. Nuclear Regulatory Commission's (NRC) regulations at 10 CFR Part 51, which implement section 102(2) of the National Environmental Policy Act of 1969, as amended (NEPA), include requirements for applicants to provide information as may be useful in aiding the NRC staff in complying with NEPA. Licensees are required by 10 CFR 51.41 and 10 CFR 51.60(a)(b) to supply an "Applicant's Environmental Report" or "Supplement to Applicant's Environmental Report" pursuant to part 30 of Title 10 of the *Code of Federal Regulations*.

RAI-1

REQUIREMENT: As required by 36 CFR § 800.3 through § 800.6, the NRC must initiate Section 106 consultation under the National Historic Preservation Act, identify historic properties, assess effects on historic properties, and resolve adverse effects, if any. To meet these requirements, the NRC relies upon applicants or consultants to prepare information, analyses, and recommendations in accordance with 36 CFR § 800.2(a)(3). To provide necessary information to consulting parties on the identification of historic properties and potential effects, information is gathered through reasonable and good faith efforts such as background research per 36 CFR § 800.4(b)(1) which is typically performed through the appropriate state repository such as the State Historic Preservation Office (SHPO).¹ In addition, Licensees are required by 10 CFR 51.41 and 10 CFR 51.60(a)(b) to supply an "Applicant's Environmental Report" or "Supplement to Applicant's Environmental Report."

REQUEST: Please provide documentation that the University of Missouri used as a basis for its findings regarding impacts to historic properties and any documentation provided to the SHPO, if documentation was provided to the SHPO. This documentation should include existing information on historic properties that may be impacted by project activities including information on whether Pickard Hall is eligible for the NRHP individually or as a contributing element of the Francis Quadrangle Historic District and the likelihood that archaeological material may be impacted by the proposed activities. This documentation should be prepared by qualified professionals² and meet the documentation standards in 36 CFR § 800.11.

¹See <https://mostateparks.com/page/84261/section-106-review> and

<https://mostateparks.com/page/84251/maps-records> for additional information specific to Missouri.

²See 36 CFR § 800.2(a)(1). Qualified professionals are those who meet the Secretary of Interior's Professional Qualifications Standards (see <https://www.nps.gov/articles/sec-standards-prof-quals.htm>).

RAI-2

REQUIREMENT: As required by 10 CFR 51.41 and 10 CFR 51.60(a)(b), applicants shall assess the impact of the proposed action on the environment, including threatened or endangered species. This analysis also is required in accordance with Federal laws protecting wildlife, including but not limited to, the Endangered Species Act (ESA). The ESA regulations at 10 CFR 402 require Federal agencies to confer with the U.S. Fish and Wildlife service (FWS) concerning Federally listed species and species proposed for Federal listing under ESA Section 7.

The FWS published one proposed rule and three final rules for four bat species:

- a proposed rule to list the tricolored bat (*Perimyotis subflavus*) as endangered under the ESA on September 14, 2022 (87 FR 56381),
- a rule to list the gray bat (*Myotis grisescens*) as endangered under the ESA on April 21, 1975 (40 FR 17590), and
- a rule to list the Indiana bat (*Myotis sodalis*) as endangered under the ESA on March 11, 1967 (32 FR 4001), and
- a rule to list the northern long-eared bat (*Myotis septentrionalis*) as endangered under the ESA on December 2, 2013 (78 FR 72058).

These species ranges are included within the proposed action area.

REQUEST: Please provide an analysis of the potential impacts of the proposed Decommissioning Plan (DP) on the tricolored bat, the grey bat, the Indiana bat, and the northern long-eared bat. For example, what would be potential impacts to each species of bat from noise, dust generation, and other activities associated with demolition and dismantlement activities.

RAI -3

REQUEST: Please provide any surveys, if present, regarding Federally listed bats within the action area.

RAI -4

REQUEST: Please specify the time of the year (months) demolition activities will occur.

RCI -1

From information gathered from the licensee amendment request submitted by the Curators of the University of Missouri (ADAMS Accession No. ML23151A353), the NRC staff understands that (steam) tunneling exists under the footprint of Pickard Hall. Please confirm that there are no known access points, such as grating, present where bats may enter to utilize the tunnels as hibernaculum.

RCI-2

Please confirm the absence of known observances of Federally listed bat species within the proposed action area.