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Comment On: NRC-2026-2906-0001

Orano Enrichment USA LLC; Uranium Enrichment Facility; Notice of Intent To Conduct Scoping Process and Prepare Environmental Impact Statement

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Comment on FR Doc # 2026-11785, NRC-2026-2906-0001, from LUTHER GIBSON

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General Comment

I am a retired Department of Energy (DOE) Oak Ridge prime contractor employee that worked over 40 years at the Paducah Gaseous Diffusion Plant and K-25 and Y-12 facilities in Oak Ridge. I worked in the areas of environmental technology development, operations research, environmental compliance, nuclear facility safety, and emergency management technical basis for these nuclear facilities. My work included analysis of accidental uranium hexafluoride releases and development of containment technology.

I have the following comments on issues that should be included in the scope of an environmental impact statement (EIS) for issuing a license to Orano Enrichment USA, LLC (Orano) to construct and operate a gaseous centrifuge uranium enrichment facility in Roane County, Tennessee.

To the extent that the project is a revival of Areva's proposal for the canceled Eagle Rock Enrichment Facility in Bonneville County, Idaho, this EIS should be of similar content and depth of analysis of the same issues applicable to this project as evaluated in that EIS (NUREG-1945).

At a minimum, the accident scenarios for the Eagle Rock Enrichment Facility should be presented in the EIS for this new facility including but not limited to:

- Inadvertent nuclear criticality
- Hydraulic rupture of a heated feed vessel
- Earthquake
- Facility-wide fire
- Sampling manifold release
- Sampling cylinder release

All hazardous chemicals in the facility should be screened for other potential accidents to analyze in the EIS.

Given the location of this project in proximity to remediation of legacy contamination by DOE at the

White Wing Scrap Yard, the potential impact on that remediation activity should be documented.

The evaluation associated with any consideration that was given to alternative nearby sites not requiring as much development should be presented in the EIS.

The EIS should evaluate cumulative environmental impacts including other nuclear projects and the external hazards posed by these projects.

Again, an EIS similar in scope, content, and amount of information to that produced for the Eagle Rock Enrichment Facility would be appropriate.