

August 14, 2018



Mr. Craig Erlanger
Director, Division of Fuel Cycle Safety, Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

**Request to Reopen EA on License Extension for Westinghouse Nuclear Fuel Facility – License No. SNM-1107 and Docket ID NRC-2015-0039 – and to Hold Public Meeting;
Discard 40-Year License Extension Consideration and Solicit Input on Need for EIS**

Dear Mr. Erlanger:

I hereby request that the comment period for the Environmental Assessment (EA) associated with the license extension for Westinghouse's Columbia Fuel Fabrication Facility be reopened and that a public meeting be held in the community near the facility in order to take public comments. Given changed circumstances with the operation of the facility, comments should be solicited at any meeting about the need for a full Environmental Impact Statement (EIS) on the operation of the facility and its environmental discharges and nuclear criticality concerns.

I further request that the Nuclear Regulatory Commission now reject consideration of the license extension for an additional 40 years and take comments at the public EA and/or EIS meeting as to how long the license might be extended (or not).

On June 15, 2018, a notice was published in the Federal Register officially releasing a document entitled *Final Environmental Assessment for the Renewal of SNM-1107 Columbia Fuel Fabrication Facility in Richland County, South Carolina*. That document, prepared in conjunction with a request to extend the license for the fuel plant for an additional 40 years, concludes that "there would be a noticeable but not significant impact to the quality of the human environment." The document goes on to make a determination that a Finding of No Significant Impact (FONSI) is warranted.

Since that document was prepared, the situation regarding the operation of the fuel plant and the public's knowledge of it has changed considerably, warranting preparation of new documents as allowed under the National Environmental Policy Act (NEPA). Given the changed circumstances and new information that has become available, it is imperative that the EA process be reopened and that preparation of a full EIS be considered.

First, there was an incident at the facility on March 15, 2018 involving a deviation from "Criticality Safety Evaluation Procedures." (See NRC event report for March 19, 2018.) This event went unreported by the media and, as far as I can determine, the community near to the facility was not informed by Westinghouse, the Nuclear Regulatory Commission or the South Carolina Department of Health and Environmental Control (DHEC) about it.

Second, an incident involving an unauthorized leak of fluoride and uranium from inside of the facility through the concrete floor and into soil underneath the facility was reported in an NRC event report of

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July 23, 2018. Neither Westinghouse nor the NRC nor DHEC have been able to quantify the volume of liquid material that leaked nor the amount of uranium that leaked. This event has rightly sparked public concern, especially in the community near to the facility, known as "Lower Richland."

Third, Westinghouse failed to develop a promised community outreach program in the aftermath of the notorious incident discovered in May 2016 concerning the buildup of uranium in the ventilation system of the fuel plant. The failure, admitted by Westinghouse officials, to develop such an outreach and communication program has become starkly clear in the aftermath of the June-July 2018 uranium leak.

Fourth, a public meeting sponsored by elected officials on August 13, 2018 in Hopkins, SC clearly revealed deep public concern about both the recent uranium leak, discharges from other events and impacts of regular operation of the Westinghouse facility. The public near to the facility was justifiably angry at complete lack of public outreach by Westinghouse after the uranium leak and inability by Westinghouse, DHEC and the NRC to fully answer questions from the public during the standing-room-only meeting held in the Hopkins Park Adult Activity Center. The issue of the NRC's consideration of the 40-year extension of the license for the facility was only mentioned in passing in response by an NRC official to a question from a member of the public. Neither the NRC nor Westinghouse nor DHEC proactively raised the licensing issue, about which the community was not informed and in which there was interest. The discussion on the licensing matter and about impacts of the operation of the facility was curtailed due to a focus on the uranium leak and due to time constraints.

Given the recent incidents at the facility and a renewed community interest in plant operations and impacts, the public in Columbia, SC area, especially those living near the fuel plant in Lower Richland, is deserving of a new opportunity to comment during a reopened NEPA process. I thus request:

1. That the NRC immediately freeze consideration for any license renewal and discard consideration of licensing for an additional 40-year time period;
2. That the NRC make a formal determination that the EA be immediately reopened and that a public meeting be held in Lower Richland in the near term to solicit comments on the public health impacts (including to facility workers) and environmental impacts of the facility and on the license renewal issue;
3. That preparation of a full EIS be considered after oral and written comments on the reopened EA are taken; and
4. That the NRC develop a method to better communicate with Lower Richland residents about incidents and discharges from Westinghouse's Columbia Fuel Fabrication Facility and that a much better effort be made to inform the public about the NRC's oversight role at the facility.

Sincerely,



Tom Clements

Senior Adviser, Friends of the Earth