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**To:** <NRCREP@nrc.gov>  
**Date:** Mon, Oct 24, 2005 11:22 AM  
**Subject:** Ohio EPA's comments on the Draft EIS for the proposed American Centrifuge Plant

Please refer to the attached comments.

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**Creation Date:** Mon, Oct 24, 2005 11:21 AM  
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State of Ohio Environmental Protection Agency

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October 21, 2005

Chief, Rules Review and Directives Branch  
U.S. Nuclear Regulatory Commission  
Mail Stop T6-D59  
Washington, DC 20555-0001

**RE: Ohio Environmental Protection Agency Comments on the Environmental  
Impact Statement for the Proposed American Centrifuge Plant in  
Piketon, Ohio**

Dear Sir/Madam:

Enclosed are the Ohio EPA comments on the Environmental Impact Statement for the  
Proposed American Centrifuge Plant in Piketon, Ohio.

If you have any questions, please do not hesitate to contact me at (740) 380-5289.

Sincerely,

*Maria Galanti for me*

Maria Galanti  
Site Coordinator  
Division of Emergency and Remedial Response

MG/jg

Enclosure

cc: Melody Stewart, OEPA-DHWM

## Comments Draft EIS

- 1) Page xxiii, Water Resources, line 29: Please describe what type of best management practices would be utilized to minimize the impact to water resources from construction activities. The Ohio EPA has completed stream sampling from around the U.S. DOE reservation. The data should be included in the EIS to evaluate the impact potential construction activity may have upon the streams and creeks surrounding the facility. USEC must ensure that there is limited impact to the streams.
- 2) Page xxiii, Water Resources, line 29: Please describe how the ACP intends to utilize a Spill Prevention and Control and Counter measure plan when they do not control all the holding ponds at the site. Please describe how coordination between USEC, U.S. DOE and UDS would be implemented to prevent a spill from leaving the site.
- 3) Page xxvi, Waste Management, line 47: Please describe the agreement the ACP has with the U.S. DOE to accept the DUF6 cylinders for the centrifuge facility. Currently, Ohio EPA is not aware that such an agreement exists. If the ACP anticipates that U.S. DOE will be responsible for converting all DUF6 cylinders from the centrifuge plant, Ohio EPA should be contacted so that proper agreements are in place and orders may be modified to allow the transfer of waste material. Additionally, the cost for conversion for the DUF6 should be included in the costs of the facility.
- 4) Page 1-2, Line 4-8: Please describe how the lease with the federal government would work once U.S. DOE has completed its mission at the site. It is highly likely that the D&D of the gaseous diffusion plant will be completed and the site will be in long term surveillance and maintenance.
- 5) Page 2-14, Section 2.1.3.2 Secondary Facilities: The document does not discuss the potential to utilize additional buildings currently leased by USEC, Inc. Please describe what other facilities may be used including those currently leased by USEC, Inc. to support the centrifuge program.
- 6) Page 2-29, Solid Waste Handling, Storage, and Transport, Line 30: What are the NRC regulatory requirements for the management of low level mixed wastes? Where in the CFR are these requirements cited?
- 7) Page 2-30 and 2-31, Management and Disposal of Depleted UF6 from Facility Operation, line 45: If USEC-ACP and U.S. DOE have reached agreement concerning the management of UF6 cylinders, please provide the information within the text. Additionally, the USEC-ACP and U.S. DOE should discuss the potential to insert a 4<sup>th</sup> process line within the conversion facility to limit the amount of time needed to complete the conversion process for the number of cylinders USEC will create over time. The U.S. DOE and USEC should be proactive in this matter and associated cost should be examined in this EIS.

- 8) Page 3-36, Section 3.8 ecological Resources, line 1: All ecological resources should be managed appropriately. The ACP should limit disturbance to only those areas in and around the facilities needed for production.
- 9) Page 3-40, Section 3.8.3 Rare, Threatened, and Endangered Species, line 42: Ohio EPA has recently completed a stream survey of the creeks and streams surrounding the facility. The EIS should include the recent data in the report for evaluations.
- 10) Page 4-26, Section 4.2.7.2 Facility Operation, line 37: The EIS should discuss the impact to rare, threatened and endangered species should an air release or incident occur which could release HF or radioactivity into the atmosphere. Discuss deposition and potential areas of the site which would be impacted.
- 11) Page 4-93, Section 4.2.15.7, line 21, Ecological Impacts: The ecological impacts from the site most likely will change during the life span of the ACP. Please discuss how these changes will be accounted for during D&D. Will USEC-ACP be responsible for conducting ecological surveys? Is there money set aside during the D&D process for these types of surveys to be conducted?
- 12) Page 7-1, Section 7.1.1 Costs of the proposed Action: It is unclear from the report if the ACP (USEC) would be responsible for the D&D of the facilities once the life cycle is completed. USEC is currently leasing the facilities from a federal agency. This document should make it clear if the federal government will be ultimately responsible for the D&D of the facilities to be used by the ACP.