

WCO outreachCEM Resource

From: Marthea Rountree [Rountree.Marthea@epamail.epa.gov]
Sent: Wednesday, February 15, 2012 5:22 PM
To: Pineda, Christine; WCO outreach Resource
Cc: Cliff Rader; Aimee Hessert
Subject: Re: draft report for comment: Background and Preliminary Assumptions For an Environmental Impact Statement- Long-Term Waste Confidence Update
Attachments: Long-Term Waste Confidence Update - Background Report (comment ltr).pdf

Christine,

Attached are EPA comments on the draft report - Background and Preliminary Assumptions For an Environmental Impact Statement- Long-Term Waste Confidence Update. We look forward to working with you on future efforts regarding the EIS. Please let me know if you have any questions or if we can assist with anything else.

(See attached file: Long-Term Waste Confidence Update - Background Report (comment ltr).pdf)

Regards,

Marthea Rountree
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From: WCO outreach Resource <WCO outreach.Resource@nrc.gov>
To: WCO outreach Resource <WCO outreach.Resource@nrc.gov>
Date: 12/30/2011 02:29 PM
Subject: draft report for comment: Background and Preliminary Assumptions For an Environmental Impact Statement- Long-Term Waste Confidence Update

Attached please find a draft report entitled "Background and Preliminary Assumptions for an Environmental Impact Statement-Long-Term Waste Confidence Update," which the NRC staff is publishing for public comment.

The NRC is anticipating that spent nuclear fuel will be stored longer than originally intended, because of the uncertainties in the national strategy for disposing of spent nuclear fuel. To prepare for this situation, the Commission updated the NRC's Waste Confidence decision and rule in December 2010 and directed the staff to develop a longer-term update, supported by an environmental impact statement (EIS), that would account for the impacts of storage beyond a 120 year timeframe.

The staff has developed the attached report to seek public feedback on the agency's preliminary plans to develop the EIS. The NRC seeks to ensure the preliminary EIS scope described in the report considers the significant factors related to the longer-term storage of spent nuclear fuel and high-level waste.

The comment period is 45 calendar days, from January 3 to February 17, 2012. The report is accessible in the NRC's Agencywide Documents Access and Management System (ADAMS) at Accession Number ML11340A141 and will also be available (on January 3) at <http://www.nrc.gov/waste/spent-fuel-storage/public-involvement.html>.

Please submit comments to WCO Outreach@nrc.gov. You may also send comments through the U.S mail to:

Christine Pineda, Project Manager
Mailstop EBB-2B2
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

We look forward to receiving your input.

Sincerely,

Staff of the Nuclear Regulatory Commission Waste Confidence Update Program
<http://www.internal.nrc.gov/ADM/branding/images/5in-color-bl-nrc-logo.gif>

You have received this email because you are included on the NRC's list of people interested in this program (you are already subscribed). To unsubscribe from the mailing list, send an email to the address above with the command unsubscribe in the subject line. Anyone who wishes to subscribe to the mailing list should send an email with the command subscribe in the subject line. You will receive a confirmation indicating that you have been added to or removed from the list.

[attachment "Background and Assumptions for an EIS--Long Term Waste Confidence Update.pdf" deleted by Marthea Rountree/DC/USEPA/US]

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Subject: Re: draft report for comment: Background and Preliminary Assumptions For an Environmental Impact Statement- Long-Term Waste Confidence Update
Sent Date: 2/15/2012 5:22:10 PM
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From: Marthea Rountree

Created By: Rountree.Marthea@epamail.epa.gov

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Reply Requested: No
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

FEB 15 2012

Ms. Christine Pineda
Mailstop EBB-2B2
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Ms. Pineda:

In accordance with our responsibilities under Section 309 of the Clean Air Act, the National Environmental Policy Act (NEPA), and the Council on Environmental Quality's (CEQ) NEPA regulations, the Environmental Protection Agency (EPA) has reviewed the Nuclear Regulatory Commission's (NRC) Draft Report, "Background and Preliminary Assumptions for an Environmental Impact Statement – Long-Term Waste Confidence Update, December 2011." This draft report is meant to support the development of an Environmental Impact Statement (EIS) that will generically evaluate the impacts of extended storage and associated transportation of spent fuel.

Based on the information provided in the report and additional pre-scoping activities, we offer the following comments for your consideration.

1. While we understand that NRC is currently in the process of developing alternatives that will be evaluated in the upcoming EIS, the draft report is unclear as what alternatives are being considered for evaluation. We recognize that the EIS will examine the environmental impacts of extending the temporal scope of the current Waste Confidence rule by as many as 200 years, however it is not clear whether other storage timeframes, both shorter and longer, will also be evaluated. In addition, the draft report is unclear whether alternatives that would change the current 5 to 10 year review/update cycle for the Waste Confidence rule will be examined. We recommend that the final report more clearly articulate a range of reasonable alternatives that may be considered in the upcoming EIS, and consider whether including alternative storage timeframes and schedules for updates of the Waste Confidence rule would be appropriate.

2. Section 8.1(5) states that while re-packaging of spent fuel for disposal may occur, the impacts of re-packaging will not be considered in this EIS. Given that existing fuel storage facilities may have complied with previous iterations of the Waste Confidence rule and decision (i.e., facilities have planned to store waste for no more than 60 years past the licensed life of operation), we recommend that consideration of re-packaging be part of the continued storage at reactor sites scenarios that will be evaluated in the EIS.
3. Section 9 lists potential impacts of storage that would be evaluated in the EIS, including radiation doses to "workers." We recommend that the definition of "worker" be broadly defined to include construction, operation, auxiliary, off-site, and on-site staff. This is especially important since re-packaging of waste and concurrent storage, construction, and operation of facilities could be among the scenarios analyzed.
4. We recommend that the final report clarify how each scenario would address demographic changes over the period of analysis, including changes in population location. In addition, we recommend that the final report outline how the EIS will evaluate the potential for disproportionately high and adverse human health or environmental effects on minority and low-income populations.

We appreciate your efforts to engage EPA in the pre-scoping activities and the opportunity to review and comment on this document. We look forward to continued collaboration during the formal scoping process and development of the EIS. If you have any questions, you may contact me at (202) 564-5400. You may also call my staff point of contact, Marthea Rountree at (202) 564-7141.

Sincerely,

A handwritten signature in black ink that reads "Susan E Bromm" followed by a horizontal line.

Susan E. Bromm
Director
Office of Federal Activities