

StrataRossLAPem Resource

From: Moore, Johari
Sent: Thursday, January 30, 2014 8:17 AM
To: 'bschiffer'
Cc: StrataRossLA Resource
Subject: RE: Ross Final Draft PA Interim Review

Ben,

We are reviewing your comments and will provide a response to your request shortly.

Thank you,

Johari A. Moore
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FSME/DWMEP/Environmental Review Branch
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From: bschiffer [<mailto:bschiffer@wwcengineering.com>]
Sent: Tuesday, January 28, 2014 6:24 PM
To: Moore, Johari
Cc: Waldron, Ashley; Mike Griffin; Saxton, John; Hsueh, Kevin
Subject: Ross Final Draft PA Interim Review

Johari--

Please see the attached Final Draft PA for the Ross Project with some red lines and comments. In addition, we have provided a brief list below of specific stipulations to discuss with NRC as the previous webinar sessions were insufficient and given our critical role as a signatory and in funding these endeavors we believe our concerns should be important to the NRC. Notice that I have not copied the entire group on this transmittal as we believe resolution of our concerns during this interim period will expedite final review by agencies and consulting parties. That is, we'll revise our final comments on the PA pending further discussions with NRC. We hope that these discussions can be done via the PM-to-PM process and soon such that our final comments can be assembled expeditiously. Mike and I are prepared to discuss in the coming days provided we receive some notification from you. As you well know, we believe that the PA development process could delay final licensing and that would be extremely unfortunate given all of the hard work by ourselves, NRC and the entire group. Please let us know at your soonest convenience when we might be able to spend some time reviewing the attached Draft PA.

Respectfully,

Ben

List of Specific Stipulations for Discussion

1. Stips B.2.b, C.1, C.2, D.2.f, D.3.d, F.1.a, F.1.c--Specified review times are absolutely critical.
2. Stips B.2.a and B.2.b--Vague language on spatial extent of future Phases.
3. Stip B.4.e--Additional site visits by consulting parties are unnecessary.
4. Stips D.2.h/i and D.3.h--Inconsistent process to address comments by/from consulting parties.
5. Stips F.2.a and F.2.b--Human remain discovery protocol references incorrect WS and would result in Strata employee getting charged with a misdemeanor.
6. Stips F.1.a, F.1.b and F.2.a--Offset distances inconsistent with other PAs and seemingly arbitrary given survey methods (30 m transects).
7. Stip J--Added stipulation for Coordination with other Federal Reviews.
8. Stip L--Should duration be consistent with license period i.e. 10 yrs?

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