

NRR-PMDAPEm Resource

From: Jennifer Campbell <Jennifer.Campbell@mdc.mo.gov>
Sent: Thursday, June 02, 2016 5:21 PM
To: Moser, Michelle
Cc: Irwin, Mike (mike.irwin@dnr.mo.gov) (mike.irwin@dnr.mo.gov); bryan_simmons@fws.gov; daniels.jason@epa.gov; Martinez, Nancy; Folk, Kevin; Brittnie Brauner
Subject: [External_Sender] RE: Environmental Review for the Proposed Northwest Medical Isotopes, LLC Facility
Attachments: MDCcomments_USNuclearRegulatoryCommission_Northwest Medical Instruments_6.2.2016.pdf

Michelle,

Attached are comments for your consideration in development of the EIS for Northwest Medical Instruments in Boone County, MO. Thanks for your coordination. We appreciate the opportunity to comment. Contact me with any questions at 573-522-4115x3159.

Thanks,
Jennifer

Jennifer K. Campbell
Policy Coordinator
Missouri Department of Conservation
(573) 522-4115
Jennifer.Campbell@mdc.mo.gov

From: Moser, Michelle [<mailto:Michelle.Moser@nrc.gov>]
Sent: Tuesday, April 26, 2016 11:16 AM
To: Brittnie Brauner
Subject: Environmental Review for the Proposed Northwest Medical Isotopes, LLC Facility

Brittnie,

It was a pleasure to talk with you the other day on the phone. As I mentioned during our conversation, I am a biologist with the U.S. Nuclear Regulatory Commission (NRC). Northwest Medical Isotopes, LLC (NWMI) submitted an application to the NRC to construct a radioisotope production facility that, if licensed, would produce medical radioisotopes. NWMI would construct a production facility building, a support facility, a waste staging and shipping building, diesel generator building, administration building, and security stations. The proposed Discovery Ridge site includes 7.4 acres (ac) (3.0 hectares (ha)) of land located about 3 mi (5 km) southeast of the City of Columbia. The proposed site has been used for agricultural purposes for several decades. In its application to the NRC, NWMI did not identify any forests, prairies, riparian zones, or streams on the proposed Discovery Ridge site.

Attached is a Natural Heritage Level 3 Report regarding the proposed NMWI project. In addition, I've attached a list of State-endangered species that have the potential to occur on or near the site. The attached list of species also includes Federally-listed species, which is based on information provided by the U.S. Fish and Wildlife Service. Per our conversation, the NRC requests any additional information you may have regarding State-protected species, Natural Communities of Conservation Concern, and any other important ecological resource on or near the proposed Discovery Ridge site.

Please feel free to contact me if I can provide any additional information. My phone number is 301-415-6509 and my email is Michelle.Moser@nrc.gov.

Regards,

Michelle Moser

Michelle Rome Moser
Biologist
U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Division of License Renewal
Phone: 301-415-6509
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Hearing Identifier: NRR_PMDA
Email Number: 2883

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Subject: [External_Sender] RE: Environmental Review for the Proposed Northwest Medical Isotopes, LLC Facility
Sent Date: 6/2/2016 5:21:18 PM
Received Date: 6/2/2016 5:21:30 PM
From: Jennifer Campbell

Created By: Jennifer.Campbell@mdc.mo.gov

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ROBERT L. ZIEHMER, Director

June 2, 2016

Ms. Michelle Rome Moser
U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
11555 Rockville Pike
Mailbox OE-11
Rockville, Maryland 20852

Ms. Moser:

Thank you for the opportunity to comment during the development of a Draft Environmental Impact Statement for the Northwest Medical Isotopes, LLC facility proposed southeast of Columbia, Missouri in Boone County, Missouri (Section 33, Township 48 North, Range 12 West and LandGrant 2536).

The information provided about the project describes the work as:

[Northwest Medical Isotopes, LLC] NWM I would construct a production facility building, a support facility, a waste staging and shipping building, diesel generator building, administration building, and security stations. The proposed Discovery Ridge site includes 7.4 acres (ac) (3.0 hectares (ha)) of land located about 3 mi (5 km) southeast of the City of Columbia. The proposed site has been used for agricultural purposes for several decades. In its application to the [Nuclear Regulatory Commission], NWM I did not identify any forests, prairies, riparian zones, or streams on the proposed Discovery Ridge site.

From email conversation, the facility does not propose to withdraw or discharge cooling water from or into surface water. Process water for the facility will originate from the City of Columbia and wastewater would return to the municipal sanitary sewer system. Radiological and non-radiological waste would be handled within enclosed buildings. Storm water runoff would be accommodated by an engineered storm water management system.

The Missouri Department of Conservation (Department) is the agency responsible for fish, forest and wildlife resources in Missouri. As such, the Department actively participates in project reviews when projects might affect those resources. The Department has no regulatory role, however, the following comments and recommendations are for your consideration and are offered to avoid, minimize, and where necessary mitigate impacts to fish, forest, and wildlife resources. Please consider the following comments:

1. Per your request, enclosed find a Natural Heritage Review Report, which covers species of conservation concern in the vicinity of the proposed project site known as Discovery Ridge. If site development or construction will result in tree removal, the applicant is encouraged to

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coordinate with the U.S. Fish and Wildlife Service (Ecological Services, 101 Park Deville Drive, Suite A, Columbia, Missouri 65203-0007; Phone 573-234-2132 Ext. 100 for

Ecological Services) related to the Endangered Species Act.

2. The proposed site is located in the Gans Creek watershed.
3. When land use is converted from open fields to rooftops and paved roads, an increase in storm water runoff can be anticipated due to reduced infiltration. Without adequate storm water management, this increased volume of water and the increased speed of its movement can overwhelm drainage networks (streams) off site and result in erosion of stream banks downstream. Adequate storm water management at development sites reduces the risk of damaging downstream aquatic habitat and function.
4. The proposed project will convert the majority of the project site to surfaces that are less pervious than the current condition. Details of storm water management were not provided with the material to review. The Department suggests that storm water design seek a "no net increase" in runoff compared to pre-construction condition.
5. Regionally native plants should be used to revegetate areas where soils are disturbed for the project. Exercise caution to avoid introduction of non-native plants to the watershed, such as through a Hazard Analysis Critical Control Plan described by the American Society for Testing and Materials (ASTM E2592-80).

Thank you for your coordination and the opportunity to comment. If you have any questions about these comments, please contact me at (573) 522-4115, extension 3159 or by e-mail at jennifer.campbell@mdc.mo.gov.

Sincerely,



JENNIFER K. CAMPBELL
POLICY COORDINATOR

c: Mike Irwin, DNR
Jason Daniels, EPA
Bryan Simmons, USFWS



Missouri Department of Conservation Natural Heritage Review Report

May 16, 2016 -- Page 1 of 2

Resource Science Division
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Prepared by: Brittne Brauner
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MICHELLE ROME MOSER
U.S. NUCLEAR REGULATORY
COMMISSION
OFFICE OF NUCLEAR REACTOR
REGULATION
DIVISION OF LICENSE RENEWAL

Project type:	LAND DEVELOPMENT
Location/Scope:	T48N R12W S33 & LANDGRANT 2536
County:	BOONE
Query reference:	NORTHWEST MEDICAL ISOTOPE PROJECT
Query received:	4/26/2016

This NATURAL HERITAGE REVIEW is not a site clearance letter. Rather, it identifies public lands and sensitive resources known to have been located close to and/or potentially affected by the proposed project. On-site verification is the responsibility of the project. Natural Heritage records were identified at some date and location. This report considers records near but not necessarily at the project site. Animals move and, over time, so do plant communities. To say "there is a record" does not mean the species/habitat is still there. To say that "there is no record" does not mean a protected species will not be encountered. These records only provide one reference and other information (e.g. wetland or soils maps, on-site inspections or surveys) should be considered. Look for additional information about the biological and habitat needs of records listed in order to avoid or minimize impacts. More information is at <http://mdc.mo.gov/discover-nature/places-go/natural-areas> and [mdc4.mdc.mo.gov/applications/mofwis/mofwis_search1.aspx](http://mdc.mo.gov/applications/mofwis/mofwis_search1.aspx).

Level 3 issues: Records of federal-listed (these are also state-listed) species or critical habitats near the project site:

Gray bats (*Myotis grisescens*, federal and state-listed endangered), Indiana bats (*Myotis sodalis*, federal and state-listed endangered) and Northern long-eared bats (*Myotis septentrionalis*, federal-listed threatened) occur near the project site, with the closest occurrences being 3.2, 3.5 and 3.5 miles from the project site, respectively.

Gray bats forage over streams, rivers, and reservoirs. Avoid entry or disturbance of any cave inhabited by gray bats and when possible retain forest vegetation along the stream and from the gray bat cave opening to the stream. See <http://mdc.mo.gov/104> for best management recommendations.

Indiana and Northern long-eared bats hibernate during winter months in caves and mines. During the summer months, they roost and raise young under the bark of trees in riparian forests and upland forests near perennial streams. During project activities, avoid degrading stream quality and where possible leave snags standing and preserve mature forest canopy. Do not enter caves known to harbor Indiana bats, especially from September to April. **If any trees need to be removed by your project, please contact the U.S. Fish and Wildlife Service (Ecological Services, 101 Park Deville Drive, Suite A, Columbia, Missouri 65203-0007; Phone 573-234-2132 Ext. 100 for Ecological Services) for further coordination under the Endangered Species Act.**

FEDERAL LIST species/habitats are protected under the Federal Endangered Species Act. Contact the U.S. Fish and Wildlife Service (101 Park Deville Drive Suite A, Columbia, Missouri 65203-0007, 573-234-2132) for Endangered Species Act coordination and concurrence information.

Level 2 issues: Records of state-listed (not federal-listed) endangered species AND / OR state-ranked (not state-listed endangered) species and natural communities of conservation concern. The Department tracks these species and natural communities due to population declines and/or apparent vulnerability.

Natural Heritage records identify no state-listed endangered species within the project area.

Natural Heritage records identify no state-ranked species and/or natural communities within the project area.

See <http://mdc.mo.gov/sites/default/files/resources/2010/04/2015speciesconcern.pdf> for a complete

list of species and communities of conservation concern.

STATE ENDANGERED species are listed in and protected under the Wildlife Code of Missouri (3CSR10-4.111).

General recommendations related to this project or site, or based on information about the historic range of species (unrelated to any specific Natural Heritage records):

- Boone County has known [karst geologic features](#) (e.g. caves, springs, and sinkholes, all characterized by subterranean water movement). Few karst features are recorded in Natural Heritage records, and ones not noted here may be encountered at the project site or affected by the project. Cave fauna (many of which are species of conservation concern) are influenced by changes to water quality, so check your project site for any karst features and make every effort to protect groundwater in the project area.
- Construction should be managed to minimize erosion and sedimentation/runoff to nearby streams and lakes, including adherence to any “Clean Water Permit” conditions. Project design should include stormwater management elements that assure storm discharge rates to streams for heavy rain events will not increase from present levels. Revegetate disturbed areas to minimize erosion using native plant species compatible with the local landscape and wildlife needs. Annual ryegrass may be combined with native perennials for quicker green-up. Avoid aggressive exotic perennials such as crownvetch and sericea lespedeza.
- Invasive exotic species are a significant issue for fish, wildlife and agriculture in Missouri. Seeds, eggs, and larvae may be moved to new sites on boats or construction equipment, so inspect and clean equipment thoroughly before moving between project sites.
 - ◆ Remove any mud, soil, trash, plants or animals from equipment before leaving any water body or work area.
 - ◆ Drain water from boats and machinery that have operated in water, checking motor cavities, live-well, bilge and transom wells, tracks, buckets, and any other water reservoirs.
 - ◆ When possible, wash and rinse equipment thoroughly with hard spray or HOT water ($\geq 140^{\circ}$ F, typically available at do-it-yourself carwash sites), and dry in the hot sun before using again.

These recommendations are ones project managers might prudently consider based on a general understanding of species needs and landscape conditions. Natural Heritage records largely reflect sites visited by specialists in the last 30 years. Many privately owned tracts have not been surveyed and could host remnants of species once but no longer common.

