

REQUEST FOR ADDITIONAL INFORMATION REGARDING THE
WESTINGHOUSE ELECTRIC COMPANY, LLC
COLUMBIA FUEL FABRICATION FACILITY LICENSE RENEWAL

**Environmental Report, Environmental Protection Program, and
Decommissioning Planning**

Westinghouse Electric Company, LLC (WEC) submitted a license renewal application to the U.S. Nuclear Regulatory Commission (NRC) for its Columbia Fuel Fabrication Facility requesting a license renewal period of 40 years.

The purpose of this request for additional information (RAI) is to get the information and data necessary for the NRC to fulfill the requirements of the National Environmental Policy Act of 1969 – implementing regulations of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 51. Additionally, the RAIs identify information necessary to complete the safety review of WEC's environmental protection program and decommissioning planning under 10 CFR Parts 20 and 70.

ENV 1 – Updated Environmental Report

In accordance with 10 CFR 51.45(a)-(d), provide an updated Environmental Report (ER) that reflects the new information learned from recent site investigations, information related to the recent leaks, and changes to effluent permits. The updated ER should revise any descriptions, conclusions, data and discussions in the ER, as appropriate, relating to matters such as:

- Impacts related to soil, water, and sediment due to gross alpha, uranium, gross beta, and Technetium (Tc) Tc-99 and other non-radiological contaminants in the environment, particularly groundwater (ER Sections 2.2, 4.3, 4.4, 5.4, etc);
- Potential migration pathways for contamination (groundwater, surface water, soil, etc.); exposure routes (dermal contact, ingestion, fish and shellfish ingestion, etc.); and the nearest potential receptors (onsite and offsite);
- Environmental monitoring data collected, whether for NRC, South Carolina Department of Health and Environmental Control, or WEC, since 2007 for soil, water, and sediment, including isotopic analyses; and
- Leaks and spills that occurred in the past and potential sources of contamination since the 2007 license renewal.

The regulations at 10 CFR 51.45(b) require the ER to contain a description of the environment affected by the proposed action, as well as the impacts of the proposed action on the environment. In 10 CFR 51.45(c), analyses in ERs are required to be quantitative to the fullest extent practicable and contain sufficient data to aid the NRC in its development of an independent analysis. 10 CFR 51.45(d) requires that the ER contain the status of compliance with applicable environmental quality standards and requirements.

ENV 2 – Updated License Renewal Application

Provide an updated License Renewal Application (LRA) Chapter 10 – *Environmental Protection* and any other corresponding changes to the LRA Chapter 11 – *Decommissioning*. Updates should include:

- Any proposed changes to the environmental protection program and/or decommissioning programs;
- Any proposed changes to environmental monitoring that account for (1) potential release mechanisms, including underground piping; (2) migration pathways; and (3) all potential receptors – onsite and offsite;
- Any proposed changes to the environmental sampling program (e.g., environmental media, frequency, locations, constituents, number of samples etc.);
- Any changes to the quality assurance, quality control, and laboratory analyses procedures; and
- Westinghouse’s decision-making process for determining if residual radioactivity is significant, and if so, what Westinghouse’s approach is for determining if further investigation or remediation is necessary, per Regulatory Guide 4.22.

The regulations in 10 CFR 20.1406(c) and 20.1501(a) require licensees to minimize contamination of the environment, including the subsurface and to characterize subsurface contamination, respectively. The regulations in 10 CFR Part 70.22(a) require an applicant to demonstrate that proposed facilities, equipment, and procedures are adequate to protect the public health and minimize danger to life or property.