

From: [Ramsey, Kevin](#)
To: barboneal@charter.net
Cc: [Zimmerman, Jacob](#); [Lopez-Santiago, Omar](#); [Rivera Ortiz, Joel](#)
Subject: RE: New Downblending at NFS
Date: Friday, November 30, 2018 4:08:00 PM

See responses below.

Kevin M. Ramsey
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U.S. Nuclear Regulatory Commission
301-415-7506

From: barboneal@charter.net [mailto:barboneal@charter.net]
Sent: Tuesday, November 20, 2018 1:09 PM
To: Ramsey, Kevin <Kevin.Ramsey@nrc.gov>
Subject: [External_Sender] New Downblending at NFS

Kevin: Regarding the new NFS contract of \$505 Million for downblending of 20.5 metric tons of highly enriched uranium (HEU) beginning in 2019 through mid 2025, members of ECAN have a few questions:

They just finished cleaning up from the last downblending project and demolishing the buildings, if I read the NRC documents correctly.

1. Will NFS build new buildings for this downblending? If so, how many?
Response: No. The buildings that were demolished housed the processes for converting low-enriched liquid to a low-enriched powder. No downblending was conducted in those buildings. The processes for blending high-enriched uranium with natural uranium to produce low-enriched uranium liquid are still housed inside the protected area.
2. Where will they be located?
Response: See answer to Question 1.
3. Will a License Amendment be required? If not, why not? This is a new process.
Response: No license amendment has been requested for this work. Operation of the existing downblending processes was reviewed and approved previously by the NRC. It is our understanding that Nuclear Fuel Services (NFS) can provide services to its new customer using the existing NRC-licensed processes.
4. If a License Amendment is required, will it be broken into three separate pieces like the last downblending amendment back in the 2000-2003 time frame?
Response: No change to the license has been requested.
5. Will NRC require an Environmental Assessment -- (or better yet, a site-specific EIS?)
Response: No. An environmental review would assess the impact of approving a change to the license. No change to the license has been requested. Therefore, there is nothing to assess.
6. Will the public have a right to comment on this new downblending?
Response: We will not publish anything for comment because no licensing action has been requested.
7. Will the NRC have a public meeting in Erwin to discuss this new six-year downblending project?
Response: We have no plans to conduct a public meeting to discuss this project.

8. When will the next License Performance Review (LPR) Public Meeting be held in Erwin?

Response: The current 24-month performance assessment period for NFS extends from January 1, 2017, through December 31, 2018. The last LPR public meeting was conducted in April 2017. I would estimate that the next LPR public meeting would be in April 2019.

We are concerned, because they are still having safety and environmental issues, i.e.:

- the 17-liter spill of Uranyl Nitrate on July 11, 2018, with worker contamination.
- their continuing failure to meet the Criticality Accident Alarm System (CAAS) requirements, which is a constant recurring issue that has been ongoing for years.
- the fire water pipe break where a portion of the water and dirt from the excavation flowed into a nearby storm water drainage system. State of Tennessee notification required in addition to NRC.

This is just a few examples of recent issues. As you well know, there are more.

Thank you for answering our questions.

Barbara O'Neal
f/Erwin Citizens Awareness Network (ECAN), Inc.