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# PUBLIC SUBMISSION

**Docket:** NRC-2015-0039

Westinghouse Electric Company, LLC; Columbia Fuel Fabrication Facility

**Comment On:** NRC-2015-0039-0006

Westinghouse Electric Company, LLC; Columbia Fuel Fabrication Facility

**Document:** NRC-2015-0039-DRAFT-0033

Comment on FR Doc # 2019-23419

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## Submitter Information

**Name:** Anonymous Anonymous

**Submitter's Representative:** Bill Stangler

**Organization:** Congaree Riverkeeper

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## General Comment

I am submitting the attached comments on behalf of Congaree Riverkeeper.

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## Attachments

CRK Westinghouse EA Comments



November 26, 2019

Office of Administration, US NRC  
MS TWFN-7-A60M  
ATTN: Program Management, Announcements, and Technical Editing  
Washington, DC 20555-001

Re: Draft Environmental Assessment related to the License Renewal of Westinghouse Columbia Fuel Fabrication Facility in Hopkins, SC

To whom it may concern,

I am submitting these comments concerning the draft Environmental Assessment of Westinghouse Columbia Fuel Fabrication Facility on behalf of Congaree Riverkeeper. Congaree Riverkeeper is a grassroots nonprofit organization that works to protect the Broad, Lower Saluda and Congaree Rivers, and their tributaries.

We fundamentally disagree with the NRC's preliminarily conclusion that continued operation of this facility for an additional 40 years would not have a significant impact on the environment. The Environmental Assessment acknowledges that there have been releases to the environment, are ongoing impacts, and are likely to be future impacts.

"Due to past releases, the uncertainty of the migration pathways for contamination, and because it is likely that there will be leaks and spills in the future, the NRC determined that there could be noticeable impacts to the soil, surface water, and groundwater." (EA Executive Summary, Page ii)

As regulators have asked more questions about this facility we have learned about more problems, and new monitoring has revealed new issues. This alone should require the NRC to conduct a full Environmental Impact Statement. An EIS is what NEPA envisions for facilities like this (10 CFR part 1021, Subpart D), especially ones with the troubled history this facility has had.

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The EA gives significant weight to the recent consent agreement between the South Carolina Department of Health and Environmental Control (DHEC) and Westinghouse. While we appreciate the work DHEC has done to address the numerous issues at this facility, the consent agreement itself does not guarantee there will be no significant impacts. There are significant monitoring requirements, but we don't yet know what remediation will look like, or how effective it will be. We cannot assume the consent agreement will prevent or solve all impacts.

It is for these reasons that we request the NRC conduct a full environmental Impact Statement.

Finally, should the NRC decide to move forward with the relicensing without an EIS, we urge to NRC to adopt a license term of no more than 10 years. The EA acknowledges that a shorter license period would reduce the potential for future contamination.

"If the NRC were to approve WEC's license (SNM-1107) for a period of less than 40 years, there would be less potential for contamination from future leaks and spills." (EA, Page 4-18)

We appreciate the opportunity to provide these comments.

Sincerely,

Bill Stangler  
Congaree Riverkeeper

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