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June 18, 2025  
XO1-25-006

ATTN: Document Control Desk  
US Nuclear Regulatory Commission  
Washington, DC 20555-000

**Subject: Energy Northwest New Nuclear Small Modular Reactor (SMR)  
Integrated Environmental Review White Paper, Revision 0**

This letter transmits Revision 0 of the Energy Northwest New Nuclear, LLC (ENNN) white paper on a proposed integrated environmental review for the ENNN SMR project.

The white paper contains business sensitive information related to proposed scheduled activities. EN requests that portions of the white paper be withheld from public disclosure in accordance with 10 CFR 2.390, "Public inspections, exemptions, request for withholding," paragraph (a)(4).

An affidavit providing the basis for this request is provided in Enclosure 1. Enclosure 2 is the non-public version of the white paper which contains business sensitive information. Enclosure 3 is the public (redacted) version of the white paper.

In addition, ENNN requests that NRC coordinate a public meeting with ENNN, NRC, US Department of Energy Hanford Field Office (DOE-HFO), and Washington's Energy Facility Site Evaluation Council (EFSEC) to discuss the white paper, including a closed session to discuss the proprietary information. Enclosure 4 contains the slides prepared by ENNN for that meeting.

This letter contains no commitments. If you have any questions or need any additional information, please contact Theresa Howell at [thowell@energy-northwest.com](mailto:thowell@energy-northwest.com) or (509)-377-8557.

XO1-25-006

Page 2 of 2

Sincerely,

Signed by:

A handwritten signature in black ink that reads "Lisa Williams". The signature is written in a cursive style with a loop at the end of the name.

D582EC1FE95E4D8...

Lisa Williams

Operations, Licensing, & Environmental Manager

Enclosures:

- 1) Affidavit Supporting Request for Withholding from Public Disclosure
- 2) Energy Northwest New Nuclear SMR Integrated Environmental Review, Revision 0 (Proprietary)
- 3) Energy Northwest New Nuclear SMR Integrated Environmental Review, Revision 0 (Non-Proprietary)
- 4) Integrated Environmental Review Public Meeting Slides

cc:

Greg Cullen

Ken Langdon

Don Gregoire

Nathan Clark

Enclosure 1  
Affidavit Supporting Request for Withholding from Public Disclosure

I, Lisa Williams, Manager, Operations, Licensing, and Environmental for Energy Northwest (EN) New Nuclear Projects do hereby affirm and state:

1. I have knowledge of the criteria used by EN in designating information as proprietary and am authorized to execute this affidavit on behalf of EN. I am further authorized to review information submitted to or discussed with the U.S. Nuclear Regulatory Commission (NRC) and apply for the withholding of information from disclosure.
2. The purpose of this affidavit is to provide the information required by 10 CFR 2.390(b)(1) in support of EN and the project's request for proprietary treatment of certain commercial information submitted in Enclosure 2 to this letter which is requested to be withheld under the provisions of 10 CFR 2.390(a)(4).
3. Pursuant to the provisions set forth in 10 CFR § 2.390(b)(4), the following is provided for consideration by the Commission in determining whether the information sought to be withheld from public disclosure should be withheld.
  - a. The information sought to be withheld in Enclosure 2 has been held in confidence by EN as confidential financial and commercial information.
  - b. The information is of a type that is customarily held in confidence by EN based on the rationale described in this affidavit.
  - c. The information is being transmitted to and, pursuant to 10 CFR 2.390, received by the NRC in confidence.
  - d. No public disclosure of the information has been made, and it is not available in public sources. All disclosures to third parties, including any required transmittals to NRC, have been made, or must be made, pursuant to regulatory provisions or contractual agreements that provide for maintenance of the information in confidence.
  - e. The information requested to be withheld contains information about the planned activities of EN related to development of the project, project development time frames, and relates the commercial strategy for the project. Release of the information requested to be withheld would reveal valuable information regarding development, competitive expectations, assumptions, current position and strategy. Its use by a competitor could substantially improve the competitor's position in licensing and construction of a similar project and harm continued financial support for this project.

I declare under the penalty of perjury that the foregoing is true and correct. Executed on this 18<sup>th</sup> day of June 2025.

Signed by:  
  
D582EC1FE95E4D8...  
Lisa Williams  
Operations, Licensing, and Environmental Manager  
Energy Northwest

Enclosure 2

Energy Northwest New Nuclear SMR Integrated Environmental Review, Revision 0  
(Proprietary)

Enclosure 3

Energy Northwest New Nuclear SMR Integrated Environmental Review, Revision 0  
(Non-Proprietary)

**Non-Proprietary**  
**ENNN SMR INTEGRATED ENVIRONMENTAL REVIEW**

**Small Modular Reactor Project**  
**Energy Northwest New Nuclear, LLC**  
**Integrated Environmental Review**

June 2025

Revision 0

**Non-Proprietary**  
**ENNN SMR INTEGRATED ENVIRONMENTAL REVIEW**

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## **1.0 INTRODUCTION**

### **1.1 Purpose**

Energy Northwest New Nuclear, LLC (ENNN) intends to construct a small modular reactor (SMR) project on leased land at the Hanford Site in Washington State to address an ever-increasing need in the Pacific Northwest for firm, clean, and reliable electrical generation. ENNN recognizes that this decision requires approvals from the US Nuclear Regulatory Commission (NRC), the US Department of Energy, (DOE), and Washington's Energy Facility Site Evaluation Council (EFSEC). The approvals from each agency would be most efficient if the agencies could work together in collaboration through the environmental decision, document development, review, and approval processes.

In 2019, Washington State's Governor signed the Clean Energy Transformation Act (CETA) into law, committing Washington to a greenhouse gas free supply of energy by 2045. The law provides for affordable and reliable energy service, and ENNN is a key player to achieve these clean energy goals as a Joint Operating Agency in Washington State. As established in RCW 80.50.010, it is the policy of the state of Washington to recognize the pressing need for increased energy facilities. In addition, Washington is called upon to take action to avoid costly duplication in the siting process and ensure that decisions are made timely and without unnecessary delay.

Similarly, in 2025, a series of Executive Orders were signed by the President of the United States, to streamline construction and licensing of new projects to 18 months. These Executive Orders call upon the DOE and NRC to prioritize early site preparation and authorization of advanced nuclear reactors located at or operated in coordination with DOE facilities. They additionally call upon DOE to utilize categorical exclusions for construction of advanced nuclear reactor technologies and utilize emergency and other permitting procedures.

To expedite and obtain approvals in a timely manner, ENNN provides this white paper to assist each regulatory agency in accomplishing the required review and approval of the project by:

- 1) identifying needs for project approval,
- 2) increasing awareness of the regulatory approval processes and efficiency opportunities,
- 3) requesting clear roles and responsibilities be developed by the regulatory agencies,
- 4) requesting what ENNN sees as the most expedient coordination on National Environmental Policy Act (NEPA) and State Environmental Policy Act (SEPA) reviews.

### **1.2 Project Overview**

Energy Northwest has a 100% carbon-free electricity generation portfolio, and a mission to support its members and the public with clean, reliable, affordable power. As a Washington State, not-for-profit joint operating agency, Energy Northwest looks to maintain sufficient capacity to meet peak loads, while meeting the goals of Washington's 2019 Clean Energy Transformation Act (CETA) to generate electricity with carbon-free resources.

By siting advanced nuclear reactors at the former WNP-1/4 location adjacent to Columbia Generating Station, an operating 1200 MWe boiling water reactor, ENNN can progress clean

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**ENNN SMR INTEGRATED ENVIRONMENTAL REVIEW**

power generation in Washington while utilizing land that has already undergone significant site disturbance, contains existing useful infrastructure, and has undergone extensive environmental and cultural review previously.

General phases of the project include site preparation, facility construction, and facility operation. For the ENNN project, site preparation (grading, road improvements, etc.) and non-nuclear construction (admin buildings, parking lots, etc.) requires EFSEC and DOE approval. For the two remaining phases, facility construction and operation, approvals from all agencies, NRC, EFSEC, and DOE, are required.

ENNN will submit an Environmental Report (ER) to the NRC, DOE Hanford Field Office (DOE-HFO), and EFSEC to support all phases of the project. It is anticipated that the NRC will lead the environmental review, leading to a Record of Decision/Environmental Impact Statement.

## **2.0 REGULATOR AGENCY OVERVIEW**

The following sections summarize ENNN project needs from each agency and a general description of the agency review processes.

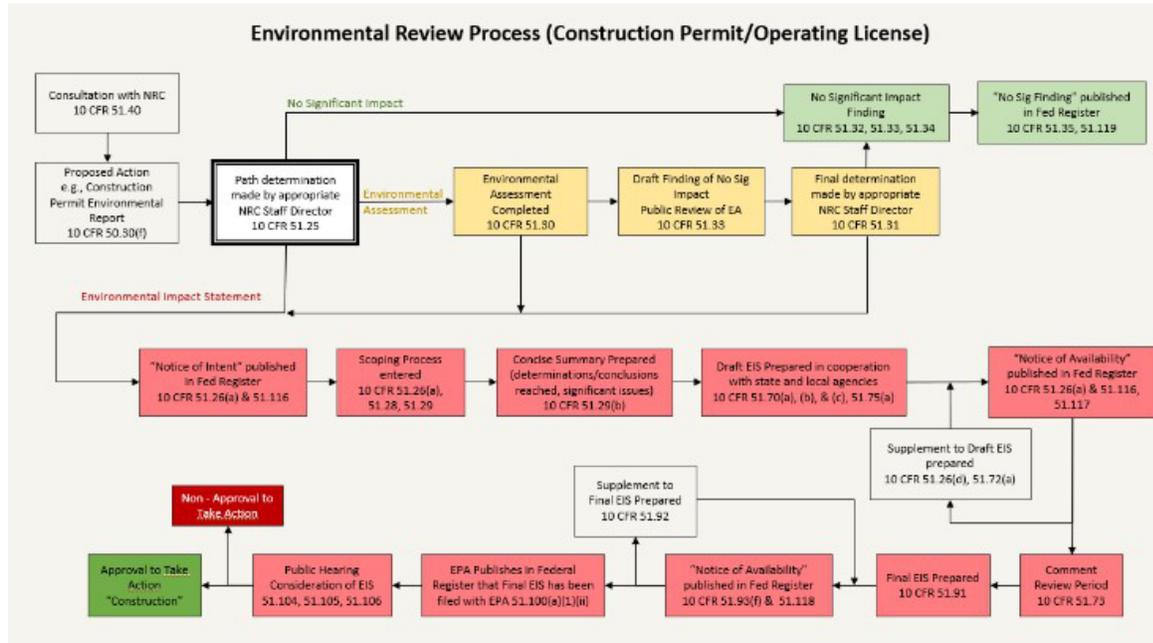
### **2.1 ENNN and NRC**

ENNN will need a construction permit (CP) for nuclear facility construction and an operating license (OL) for nuclear facility operation from the NRC, as NRC is the licensing authority for domestic licensing of nuclear reactors (10 CFR 50), including the implementation of NEPA. No approval is needed from the NRC for site preparation.

The NRC requires that the CP application (CPA) include an ER to support an environmental review (described in Figure 1) and a Preliminary Safety Analysis Report (PSAR) to support a technology safety review based on preliminary design information. The NRC will issue a draft and final Environmental Impact Statement (EIS) documenting the conclusions of the environmental review. Similarly, the NRC will issue a draft and final Safety Evaluation (SE) documenting the conclusions of the safety review. Satisfactory completion of both reviews is needed to support NRC issuance of a CP. The NRC requires that the OL application (OLA) include any new and significant environmental information to support an environmental review and a Final Safety Analysis Report (FSAR) to support operational safety review based on final design information. Satisfactory completion of both reviews is needed to support NRC issuance of an OL.

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**Figure 1. NRC Environmental Review Process.**



**2.2 ENNN and DOE**

ENNN will need an amendment to its existing lease from DOE-HFO, the landowner, to support all phases of the project. The lease amendment is subject to NEPA requirements per Contract No. AT(45-1)-2416)(1)(b) which states:

“EN agrees to obtain the written authorization of the DOE before EN engages in construction of new buildings, facilities and other improvements, including new projects or significant change in scope of activities beyond currently approved type or level of activities. DOE authorization of such approvals will depend on the outcome of NEPA and other applicable regulatory requirements.”

The DOE NEPA review process, described in 10 CFR 1021, is essentially the same as that conducted by the NRC under 10 CFR 51 (reference Figure 1).

Beyond the NEPA review, ENNN will need the DOE-HFO to support a lease revision to reflect ENNN’s right to exclusion area control as well as lease terms to support the full life of the facility. This is needed to support the NRC licensing process. ENNN’s current lease runs only through 2052, and because a lease is required for the duration of an operating license, an extension supporting a minimum of 40 years of operation will be needed.

DOE-HFO also holds a unique relationship with affected tribal nations in the region, local stakeholders, other lessees, and state and federal regulators due to their land ownership of Hanford. ENNN anticipates DOE-HFO will participate in the NEPA document development and will eventually adopt this NEPA decision in support of a lease revision.

EN submitted a Part I application to the DOE Loan Program Office (LPO) and was formally invited to participate in the Part II application process to finance up to 80% of total project costs through the loan program. The release of funds by DOE-LPO for the project is considered a

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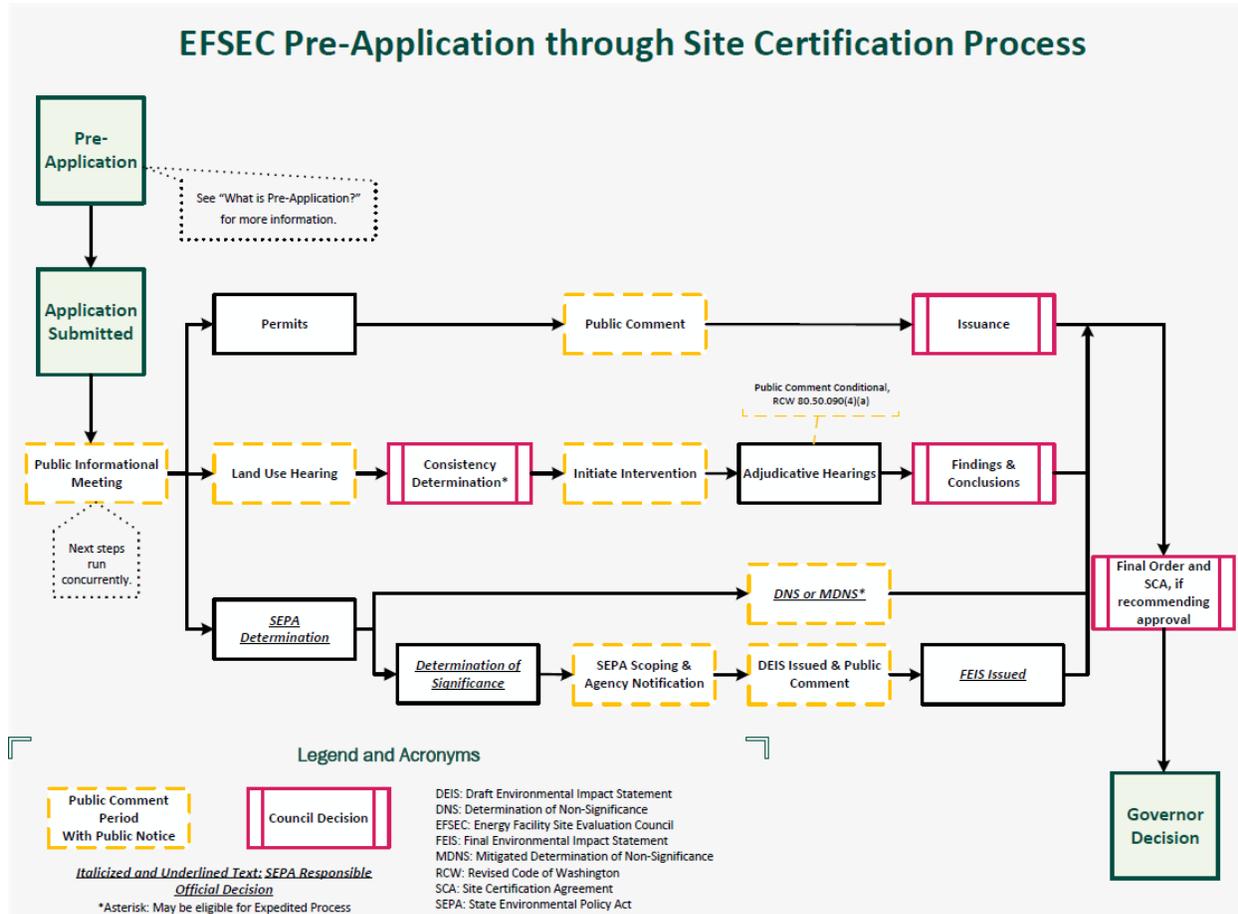
major federal action requiring a NEPA review. DOE-LPO has an existing MOU with NRC, which outlines the cooperation between the agencies. DOE-LPO will utilize the NRC’s Final EIS (FEIS) to prepare their own Record of Decision related to release of funds. Once ENNN completes the submittal of the Part II application, ENNN will formally request coordination between NRC and DOE-LPO at that time.

### 2.3 ENNN and EFSEC

ENNN will need a site certification agreement (SCA) and other environmental permits from EFSEC to support all phases of the project. EFSEC will need to comply with SEPA in order to issue these agreements and permits, and can do so by co-leading, cooperating on, or adopting a NEPA decision (WAC 197-11-610, WAC 463-47-150).

ENNN will submit an ER to the NRC, DOE-HFO, DOE-LPO, and EFSEC. For EFSEC purposes, the ER will substitute, in part, for the application for site certification (ASC) in accordance with WAC 463-60-012. The ER will be supplemented and indexed as necessary to comply with the guidelines in EFSEC’s requirements for applications and SEPA and will also be submitted with other applications for permits or permit modifications to EFSEC. A flow chart of the site certification review process is included as Figure 2.

**Figure 2. Site Certification Flow Chart.**



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**2.4 ENNN and BPA**

ENNN will need the Bonneville Power Administration (BPA) to eventually update the transmission network to support the operation phase. BPA, who owns and operates the transmission system will conduct its own NEPA review for the transmission network upgrades. This is not considered part of the ENNN project except where modifications are required within the site boundary, if applicable. There is a clear line of handoff to BPA authority at the 500kV connection line, which will be contractually described in diagrams. Currently, BPA is conducting the necessary studies for interconnecting the facility to the grid.

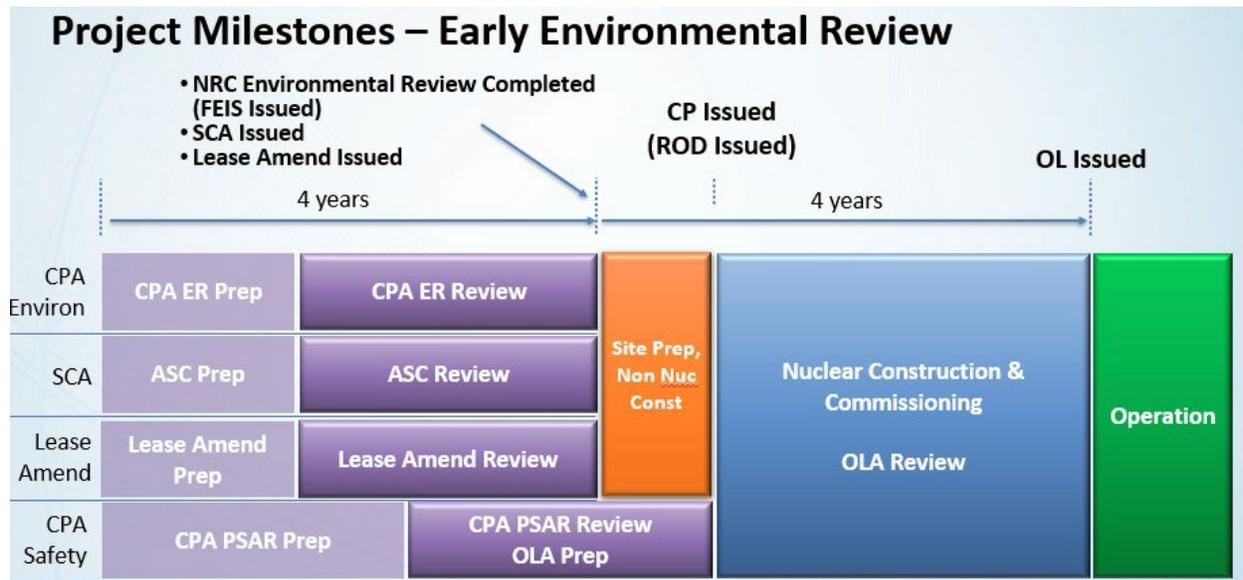
**2.5 Project Milestones and Collaboration Needs**

Since the environmental review of the project is a required activity to support each agency's action, it plays a major role in each agency accomplishing their support mission. The timing of completion of the environmental review supports the timing of the first phase of site preparation, which will also include non-nuclear related construction.

Under the requirements of NRC licensing, EFSEC's site certification, and DOE-HFO's lease revisions, site prep and non-nuclear site construction should be able to occur after environmental reviews are completed by all agencies, but before NRC safety reviews for the construction permit application are finished. Figure 3 provides a depiction of possible project timelines provided the NRC can complete an environmental review before the safety review.

If accomplished, as shown in Figure 3, this would allow ENNN to begin site prep activities once NRC, DOE-HFO, and EFSEC environmental reviews are completed.

**Figure 3. Early Environmental Review Milestones**



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### **3.0 POTENTIAL CHALLENGES AND RECOMMENDED SOLUTIONS**

#### **3.1 Potential Challenges**

##### **3.1.1 Challenge 1 – NEPA and SEPA Scope and Process Alignment**

ENNN has selected X-energy's high temperature gas-cooled reactor technology for the SMR project. ENNN will license twelve 200MWt Xe-100 reactors deployable in three phases of four reactors each. The lead project utilizing the Xe-100 technology will be deployed by Long Mott Energy, LLC (LME), a subsidiary of the Dow Chemical Company, in Seadrift, TX.

LME has recently submitted a CPA to license four Xe-100 reactors. The NRC has preliminarily determined that an EIS is not required, and an Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) will be prepared.

NRC could potentially proceed with a threshold determination and EA for the ENNN project that does not include adequate scoping or regulatory analysis for other agencies to adopt the decision. Washington State has no state equivalent of a NEPA EA. If scoping does not adequately meet EFSEC's requirements, EFSEC would need to issue a full or supplemental EIS, leading to delays in project approval and issuance of the SCA.

Additionally, with the issuance of the executive order, the NRC is called upon to reduce review times, which may not allow for adequate scoping by all parties. For this reason, ENNN is not seeking an exemption from the 10 CFR 51.20 requirement to prepare an EIS for the construction of a nuclear power facility.

##### **3.1.2 Challenge 2 – Consultation and Public Involvement**

Tribal Consultation and public engagement will be required of each agency. Separate and uncoordinated interactions with the tribes and the public can lead to confusion, delays, and lack of support from affected tribal nations. In addition, consultation offers to the tribes extended at different times can lead to consultation start and finish times that vary significantly.

##### **3.1.3 Challenge 3 – Project Schedule and Staffing**

Lack of agreement on schedules and staffing early in the process could lead to support and approval delays. State and federal agencies may need to hire consultants and establish inter-agency agreements to ensure all requirements are satisfied. Without adequate coordination, agency resource planning may not be optimized and could result in unnecessary agency costs and delays that ultimately would need to be passed on to ENNN as the applicant.

##### **3.1.4 Challenge 4 – Federal or State Policy Issues**

Federal or state policy or authority changes on many environmental topics could delay project decisions and increase regulatory uncertainty, ultimately impacting project viability. Loose coordination (e.g., no formal agreements) between agencies could result in each agency moving independently, leading to extensive completion times.

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**3.2 Recommended Solutions**

**3.2.1 Recommendation 1 - NEPA and SEPA Scope and Process Alignment**

ENNN is not seeking an exemption from the requirement to prepare an EIS for construction of the nuclear power facility. ENNN does expect the NRC will utilize the arguments supporting the EA for the LME project to the greatest extent practicable to further streamline the environmental review. Thus, for scoping and process challenges, ENNN recommends that all 3 agencies participate jointly in as many ways as possible, including jointly holding public meetings, and jointly issuing responses to comments.

To ensure re-work is not required, ENNN recommends that, as much as possible, the environmental review process be jointly undertaken by all three regulators, to facilitate an EIS that can be adopted by all agencies without need for additional analysis. ENNN recommends that an MOU outlining roles and responsibilities and a schedule be developed between the regulators by end of October 2025 to support timely coordination.

**3.2.2 Recommendation 2 – Consultation and Public Involvement**

For consultation and public engagement challenges, ENNN recommends that coordinated consultation offers be provided to affected tribes as early in the process as practicable, with a specified response time to the consultation offer. ENNN recommends that all regulators jointly participate in consultation, unless it is requested by a tribe that the consultation be with only one party. DOE-HFO and Washington State agencies have had successful experience in joint consultation offers on major federal actions.

ENNN recommends that the regulatory agencies jointly develop a robust public involvement plan that will satisfy requirements and reduce tribal and public confusion early in the process.

**3.2.3 Recommendation 3 – Project Schedule and Staffing**

To address schedule and resource challenges, ENNN proposes that an integrated project schedule similar to that described in Section 4 of this white paper is agreed to among the regulators and shared with ENNN.

The project schedule should include key milestones, such as initiation of consultation or public comment periods, and hearings. Additionally, ENNN recommends that the agencies scope early for anticipated staffing needs, hire supporting contractors, and develop any necessary MOUs or inter-agency agreements with other supporting agencies.

**3.2.4 Recommendation 4 – Federal or State Policy Issues**

For policy change challenges, adequate scoping and an early gap analysis developed between the NRC, DOE, and EFSEC can identify expectations for the NEPA and SEPA documentation, help reduce risk and promote alignment between the regulators.

Readiness reviews of the ER chapters will be requested by ENNN so regulatory agencies can aid in the efficiency by providing robust comments early, prior to submittal of the ER and ASC.

Regulatory uncertainty, rulemaking, and rule implementation changes should be communicated as soon as possible to ENNN and the co-regulators.

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**4.0 PROPOSED SCHEDULE**

This section is a high-level overview of a timeline needed by ENNN to obtain an NRC issued EIS (ahead of a CP), a DOE issued lease amendment, and an EFSEC issued SCA, assuming the NRC's Final EIS is completed ahead of the safety review.

[[ **]]<sup>P</sup>/Months 1-4**

- NRC, EFSEC, and DOE align on roles and responsibilities
- All agencies establish new or revised MOUs
- Regulators establish any needed inter-agency agreements
- ENNN, NRC, EFSEC, and DOE-HFO hold tribal listening session
- ENNN submits ER Ch. 8 (Need for Power) to NRC for Readiness Review
  - EFSEC Readiness Review for this chapter not requested due to state's establishment of need for power

[[ **]]<sup>P</sup>/Months 5-10**

- EFSEC holds an informational public hearing
- ENNN submits \$50,000 fee to EFSEC so that the independent consultant can be hired
- ENNN may choose to submit ER Chapters to NRC and EFSEC for Readiness Review:
  - Ch. 1 (Introduction)
  - Ch. 2 (The Proposed Site and the Affected Environment)
  - Ch. 3 (Site Layout and Project Description)
  - Ch. 4 (Environmental Impacts from Construction of the Proposed Project)
  - Ch. 5 (Environmental Impacts from Operation of the Proposed Plant)
  - Ch. 6 (Fuel Cycle, Transportation, and Decommissioning Impacts)
  - Ch. 7 (Cumulative Impacts)
  - Ch. 9 (Environmental Impacts)
  - Ch. 10 (Conclusions)
- ENNN presents results on topics such as:
  - Environmental surveys
  - Groundwater and river water use
  - National Historic Preservation Act surveys

[[ **]]<sup>P</sup>/Months 11-12**

- ENNN incorporates comments on draft ER chapters

[[ **]]<sup>P</sup>/Month 13**

- ENNN submits ER to NRC and DOE
- ENNN submits ASC (ER with indexed state requirements) and air and water permit applications

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[[ **]]<sup>P</sup>/Months 14-17**

- NRC, DOE, and EFSEC jointly offer letters of consultation to the affected Tribal nations: Yakama Nation, Nez Perce, CTUIR, Wanapum, and possibly Warm Springs and Colville
- EFSEC asks counties, cities, and ports to appoint representatives to sit on the Council for consideration of issues in their jurisdiction. EFSEC appoints representatives.
- NRC, DOE, and EFSEC jointly issue a scoping notice
- NRC, DOE, and EFSEC hold joint initial public meeting no later than 60 days after ER submittal and site certification application. This meeting can also act as a scoping meeting for the federal or state EIS.
- NRC, DOE, and EFSEC evaluate whether environmental effects are likely to be significant (30-60 days after ER submittal). ENNN is not requesting an exemption to the requirement of 10 CFR 51.20 to prepare an EIS for the construction and operation of a nuclear power facility.

[[ **]]<sup>P</sup>/Months 17-19**

- NRC, DOE, and EFSEC hold land use hearing (NRC and DOE participation is not necessarily required, but is recommended for consistent messaging and adequate responses to public comments)
- NRC issues a Notice of Intent to write an EIS

[[ **]]<sup>P</sup>/Months 21-22**

- Tribal consultations completed to comply with 54 USC §306108 (National Historic Preservation Act), Endangered Species Act Section 7

[[ **]]<sup>P</sup>/Months 23-27**

- NRC writes the NEPA EIS, with DOE and EFSEC coordination, and EFSEC reviews to ensure SEPA requirements are met, avoiding the need for a separate SEPA supplement or addendum.
- NRC notifies the public that the draft NEPA document is ready for public review and holds joint public hearings (30-day pre-notice + 45 days)
- EFSEC and ENNN complete air and water permit conditions and conditions of SCA, if applicable

[[ **]]<sup>P</sup>/Months 28-29**

- EFSEC holds prehearing conferences and subsequent adjudicative proceedings. Because this is a federal action with NRC as the lead, ENNN recommends that NRC and DOE would participate. Legal counsel will represent the parties during hearings.

[[ **]]<sup>P</sup>/Months 30-32**

- NRC develops the response to comments document, with DOE and EFSEC collaboration, regardless of significance, due to EFSEC adoption needs

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[[ ]]  
]]<sup>P</sup>/**Months 33-36**

- NRC issues a NEPA EIS and response to comments
  - DOE and EFSEC adopt the EIS

[[ ]]  
]]<sup>P</sup>/**Month 37**

- EFSEC develops an administrative order with recommendations and SCA to be signed by Washington's Governor

[[ ]]  
]]<sup>P</sup>/**Months 38-40**

- WA Governor decision on the site certification application
- SCA and air permits issued
- DOE-HFO lease amended to include site prep and construction activities

## **5.0 CONCLUSIONS**

As outlined in this white paper, there is a need for coordinated project review and approval as well as a recognition that there are opportunities for identifying agency efficiencies early.

ENNN believes the recommendations identified in Section 3.2 of this report as well as the proposed schedule in Section 4.0 of collaboration activities would help facilitate an efficient integrated effort by all regulatory stakeholders involved.

ENNN appreciates the open communication with the regulatory agencies that has been facilitated to date, and ENNN commits to continued early, frequent communication with the regulators during the pre-application and application phases of the project. ENNN will support the regulatory agencies with timely responses to requests and support for tribal, public, and stakeholder engagements.

Enclosure 4

Integrated Environmental Review Public Meeting Slides

# Environmental Review Regulatory Engagement Timeline and Interface

ENNN/NRC Meeting

Theresa Howell

Environmental Planning Supervisor

# Environmental Review Scope and Timeline

## **New Nuclear Project Overview**

Energy Northwest New Nuclear, LLC (ENNN) intends to construct a small modular reactor project on leased land at the Hanford Site in Washington State.

Successful siting of this project requires coordination and parallel reviews by federal and state regulators.

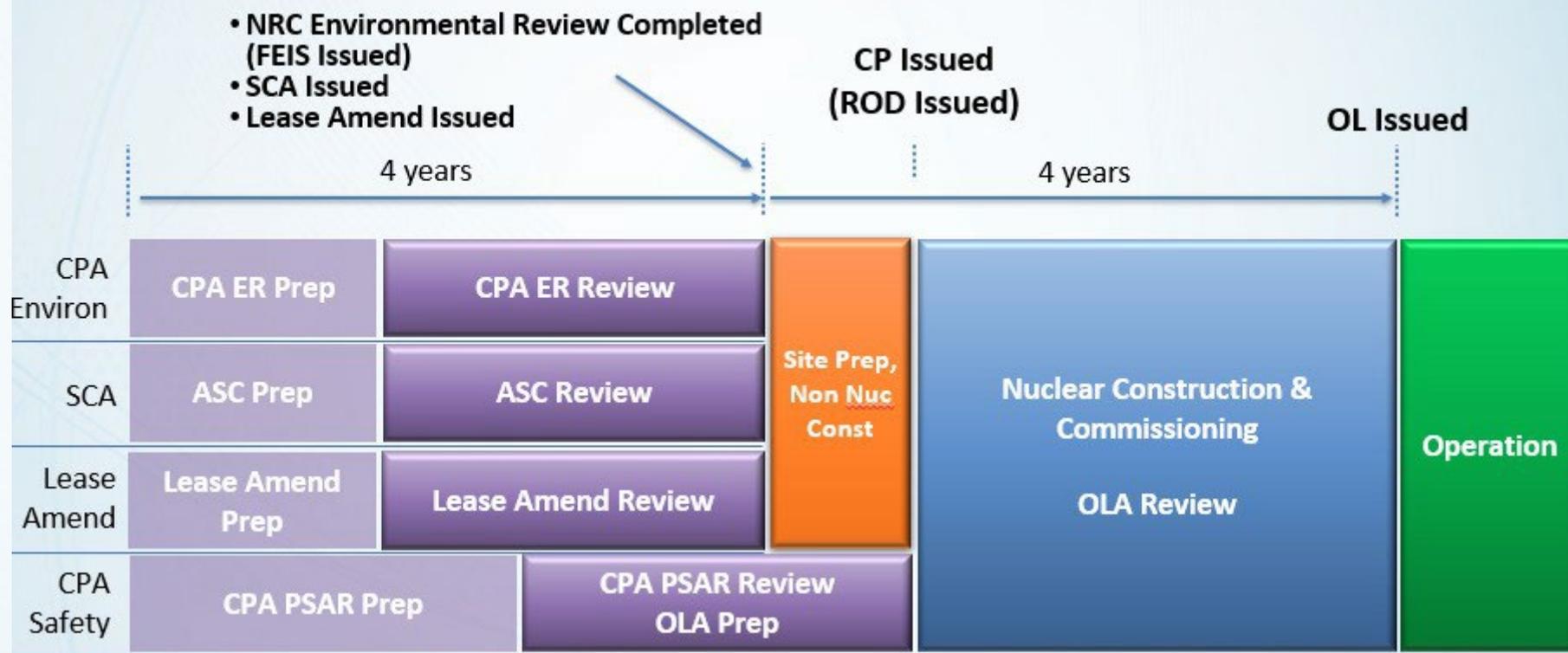
The presentation and associated white paper are provided to assist the regulators in a robust discussion leading to an agreed path forward for environmental review coordination and roles & responsibilities.

# Project Overview

# Environmental Report

- ENNN will submit an Environmental Report to the NRC, DOE Hanford Field Office (DOE-HFO) and Loan Program Office (DOE-LPO) and EFSEC.
- Goal is to begin site prep and non-nuclear construction activities once a Final Environmental Impact Statement is issued.

## Project Milestones – Early Environmental Review



# National and State Environmental Policy Act Scopes

- Environmental Review in support of a Construction Permit and Operating License
  - US Nuclear Regulatory Commission (NRC)
- Environmental Review in support of issuing a Site Certification Agreement
  - WA State Energy Facilities Site Evaluation Council (EFSEC)
- Environmental Review in support of issuing a Lease Amendment
  - US Department Of Energy-Hanford Field Office (DOE-HFO)
- Environmental Review in support of issuing funds
  - US Department Of Energy-Loan Program Office (DOE-LPO)

# Lead and Supporting Agencies

## **NRC**

- As the licensing authority, NRC is the lead under the National Environmental Policy Act (NEPA) for the major federal action.

## **EFSEC**

- As a state agency, EFSEC will cooperate on and adopt, supplement, or otherwise rely on the NEPA decision as described in the State's Environmental Policy Act (SEPA)

## **DOE**

- As a federal agency and the landowner, DOE-HFO will participate in and adopt the NEPA decision
  - DOE-LPO will also adopt the NEPA decision to support disbursement of funds

## Previous NEPA and SEPA Decisions

- Multiple sources of environmental reviews for the site exist, including:
  - Hanford's Comprehensive Land Use Plan EIS/ROD and Supplement Analyses
  - Energy Northwest's WNP-1/4 Lease Renewal FONSI/EA and SHPO determination of No Adverse Effect
  - Initial and Renewed Operating Licenses EIS/ROD for Columbia Generating Station
  - Construction Permits EIS/ROD for the former WNP-1/4 site
- ENNN will provide robust data in our Environmental Report and rely on existing environmental decision documents as much as possible to minimize new reviews required.
- ENNN will follow NRC's Reg Guide 4.2, NUREG-1555, and Washington State's WAC 463-60 and WAC 197-11 requirements in the environmental report submittal.

# Schedules

- ENNN's white paper, for review and comment by the agencies describes the interaction between the agencies and delineates a proposed schedule to reach a Final EIS and Site Certification Agreement.
- Key enablers include:
  - Early coordination between the parties
  - Agreement on roles and responsibilities
  - Integrated schedule for tribal, public, and stakeholder review process

# Summary of Challenges

Four challenges are presented for regulatory engagement:

1. NEPA and SEPA Scope and Process could be misaligned
2. Tribal Consultation and Public Involvement may create delays
3. Project Schedule and Staffing needs support early in the process
4. Federal or State Policy Issues could emerge throughout the environmental review

# Recommended Solutions

- NRC, DOE, and EFSEC should agree to the following:
  - Roles and Responsibilities
  - MOUs
  - Schedule for processing environmental documents
  - Joint public involvement plan

# Conclusions

- ENNN asks that the agencies consider the white paper provided, and agree to Roles and Responsibilities and schedule, and communicate any concerns to the ENNN project as soon as possible.
- Streamlining the regulatory review process will be key to success.
- ENNN commits to robust engagement throughout the regulatory process.

# Questions