



November 26, 2019

Office of Administration
Mail Stop: TWFN-7-A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Program Management, Announcements and Editing Staff

**Re: SC Department of Health and Environmental Control Comments on the Draft Environmental Assessment (EA) for the Westinghouse Columbia Fuel Fabrication Facility pursuant to National Environmental Policy Act (NEPA)
[Docket ID NRC-2015-0039]**

The South Carolina Department of Health & Environmental Control (SCDHEC) appreciates the opportunity to comment on NRC's draft EA and proposed Finding Of No Significant Impact (FONSI) for a 40-year license renewal for operations at the Westinghouse Columbia Fuel Fabrication Facility. Based on the new environmental data being generated at the site under SCDHEC's Consent Agreement with Westinghouse, SCDHEC believes that it is premature to make a FONSI determination at this time and is requesting that NRC either suspend making a determination at this time, or, to extend this public comment period another 120 days (to the end of March 2020), so that the bulk of new data can be received, reviewed, and evaluated to allow for making a more informed decision.

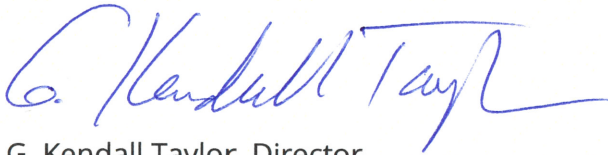
Over 40 new groundwater monitoring wells have been installed over the summer of 2019 and the first data from these wells will not be submitted until early January 2020. This work is being conducted pursuant to a Consent Agreement with SCDHEC which, in part, requires a site-wide environmental investigation. Furthermore, preliminary uranium concentration results in sediments from Upper and Lower Sunset Lakes are showing elevated levels of uranium not previously identified. Westinghouse has informed SCDHEC that there was an incident which occurred 1971 where a former wastewater lagoon ruptured and released 1 to 1.5 million gallons of wastewater into Upper Sunset Lake. The draft EA does not discuss this event nor was current SCDHEC staff aware of it through existing records. SCDHEC has learned that this event was reported to the SC Pollution Control Authority (SCDHEC's predecessor agency) at the time. Based on these initial sediment results, SCDHEC approved a more detailed sediment sampling plan on November 1, 2019 which is currently underway. The results of this further sediment sampling, however, will not be available before the end of this 30-day public notice period.

Again, given the substantial amount of new environmental information due to be submitted to SCDHEC by early January 2020, SCDHEC believes that it is premature to conclude with a FONSI for continued operations for 40 years, and therefore, cannot concur with the proposed Draft EA at this time. It is respectfully requested that the current public comment period be extended (or re-issued) for 120 days until there has been a reasonable opportunity to review all the new environmental data from the first phase of the Remedial Investigation conducted under the Consent Agreement including a better definition of the scope of the 1971 release.

The following technical/regulatory specific comments are also being submitted for the record:

1. The EA states that Westinghouse is regulated under 40 CFR 61. However, this Section has not been applicable to Westinghouse since EPA revised 40 CFR 61 Subpart I in 1996.

If you need additional information, please contact me at 803-898-0835 or taylorgk@dhec.sc.gov.



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