

Westinghouse Electric Company

Nuclear Fuel

Columbia Fuel Fabrication Facility

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USA

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Your ref:

Our ref: LTR-RAC-24-19

March 11, 2024

Subject: February 2024 CA Progress Report

Ms. Kuhn:

In accordance with Item 19 of Consent Agreement (CA) 19-02-HW, this progress report is being submitted to you, including the following requested information:

- (a) a brief description of the actions which Westinghouse has taken toward achieving compliance with the Consent Agreement during the previous month;
- (b) results of sampling and tests, in tabular summary format received by Westinghouse during the reporting period;
- (c) a brief description of all actions which are scheduled for the next month to achieve compliance with the Consent Agreement, and other information relating to the progress of the work as deemed necessary or requested by the Department; and
- (d) information regarding the percentage of work completed and any delays encountered or anticipated that may affect the approved schedule for implementation of the terms of the Consent Agreement, and a description of efforts made to mitigate delays or avoid anticipated delays.

In response to the above requirements, the following is being reported to the Department since the last progress report submitted on February 8, 2024. The following progress report is for work occurring from February 1-29, 2024:

(a) Actions during the previous month:

In accordance with **Item 7** of the Consent Agreement and to support completion of the **Feasibility Study (FS) Report** due on or before November 30, 2024, Westinghouse continued work as follows:

- Continued development of an assessment work plan for the Middle Ditch to identify the extent of contamination.
- Groundwater flow model:
 - o Completed 50 year runs that established that the system is at/near steady-state for CVOCs after approximately 10,000 days (~27 years).
 - Established an interim calibration for CVOCs, generating simulated concentrations that mimic/approximate the observed chemical concentrations for the CVOCs.
 - Revisited the flow model to encourage southerly flow in the eastern plume to reflect chemical distribution (to honor data at W-11).
 - o Verified CVOC fate and transport using this new groundwater flow field.

- Began model runs to assess the fate and transport of nitrate and fluoride.
- FS:
- Presented the progress of the FS to the Department.
- Evaluated U concentration trends in groundwater at/near W-56.
- o Began development and evaluation of remedial alternatives.
- (b) Results of sampling and tests:
 - None
- (c) Brief description of all actions which are scheduled for the next month:
 - Submit a work plan for the Middle Ditch on or before March 30th to identify the extent of contamination.
 - Groundwater flow model:
 - o Continue to calibrate the fate and transport model to nitrate and fluoride observations.
 - Work to establish a range of attenuation factors (e.g., Kd) for U that generate observed patterns.
 - Document calibration(s) and iterate for the five COPCs (CVOC, Nitrate, Fluoride, Tc-99, and U).
 - Share monitored natural attenuation (MNA) results from six groundwater wells sampled in February: W-94, W-105, W-108, W-124, W-125, and W-126. Share Iso-U results for groundwater well W-56, also sampled in February.
 - FS:
- o Continue development of remedial alternatives.
- o Select remedial alternatives for evaluation.
- o Begin remedial alternatives design and evaluation.
- (d) Percentage of work completed, and any delays encountered or anticipated:
 - 100% of the **Remedial Investigation** is complete.
 - 100% of the **Groundwater Flow Model** is completed.
 - 100% of the Feasibility Study Work Plan is completed.
 - 55% of the Groundwater Fate and Transport Model is completed.
 - 33% of the **Feasibility Study** is completed:
 - Identification of remedial action objectives/goals (complete)
 - Screening of remedial technologies (complete)
 - o Development and evaluation of remedial alternatives (10% complete, 75% of overall FS).
 - Currently there are no anticipated delays.

Respectfully,

Diana P. Joyner

Principal Environmental Engineer Westinghouse Electric Company, CFFF

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cc: N. Parr, Environmental Manager

- J. Ferguson, EH&S Manager
- J. Grant, AECOM Project Manager
- S. Subosits, Licensing Engineer

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