

TRACKED CHANGES



NUREG-2157
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Waste Confidence Generic Environmental Impact Statement

Draft Report for Comment

This TRACKED CHANGES version of the Waste Confidence Draft Generic Environmental Impact Statement (DGEIS) shows changes made since the DGEIS was submitted to the Commission for their review in June 2013. The Commission-review version of the DGEIS can be found in ADAMS under ML13150A347. Do not use this TRACKED CHANGES version of the DGEIS for submitting comments. Please use the official Draft For Public Comment version available at <http://pbadupws.nrc.gov/docs/ML1322/ML13224A106.pdf> and in ADAMS under ML13224A106.

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United States Nuclear Regulatory Commission

Protecting People and the Environment

NUREG-2157

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Waste Confidence Generic Environmental Impact Statement

Draft Report for Comment

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**Waste Confidence Directorate
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001**

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COMMENTS ON DRAFT REPORT

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Any interested party may submit comments on this report for consideration by the NRC. Please send comments by the end of the comment period specified in the *Federal Register* notice announcing the availability of this report. There are many ways to submit comments on the draft GEIS.

Submit comments online at www.regulations.gov using Docket ID No. NRC–2012–0246

E-mail comments to Rulemaking.Comments@nrc.gov, citing Docket ID No. NRC–2012–0246

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Abstract

2 In 2010, the Commission published an updated Waste Confidence decision and rule that
3 included an Environmental Assessment and finding of no significant impact. In response to the
4 2010 update, several groups filed a lawsuit in the U.S. Court of Appeals for the District of
5 Columbia Circuit challenging the 2010 Rule on grounds primarily relating to aspects of the
6 National Environmental Policy Act of 1969, as amended, (NEPA) analysis in the Environmental
7 Assessment.

8 The objective of this draft *Waste Confidence Generic Environmental Impact Statement* (draft
9 GEIS) is to examine the potential environmental impacts that could occur as a result of the
10 continued storage of spent nuclear fuel (spent fuel) at at-reactor and away-from-reactor sites
11 until a repository is available. For the resource areas considered, this draft GEIS attempts to
12 establish generic impact determinations that would be applicable to a wide range of existing and
13 potential future spent fuel storage sites. While some site-specific information is used in
14 developing the generic impact determinations, the NRC does not intend for this draft GEIS to
15 replace the NEPA analysis associated with any individual site licensing action.

16 The draft GEIS is intended to improve the efficiency of the NRC's licensing processes by
17 (1) providing an evaluation of the environmental impacts that may occur as a result of continuing
18 to store spent fuel at at-reactor or away-from-reactor sites until a repository is available,
19 (2) identifying the types and assessing the magnitude of environmental impacts where generic
20 findings can be established, and (3) providing the regulatory basis for the NRC's proposed
21 amendments to regulations in Title 10 of the *Code of Federal Regulations* Part 51,
22 "Environmental Protection Regulations for Domestic Licensing and Related Regulatory
23 Functions." To accomplish these objectives, the draft GEIS makes maximum use of existing
24 environmental impact determinations, site-specific data, publicly available literature, and public
25 comments received during the scoping period for the draft GEIS.

26 The draft GEIS evaluates alternatives to the proposed action, including a no-action alternative
27 (site-specific licensing review), a GEIS-only option, and a policy statement. The proposed
28 action would have the same potential environmental impacts as any of the alternatives
29 evaluated. However, as shown in the quantitative analysis of costs, the cost for the proposed
30 action is less than the cost for any of the alternatives.

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2 *This summary describes the contents of the U.S. Nuclear Regulatory Commission’s (NRC’s)*
3 *draft Waste Confidence Generic Environmental Impact Statement (draft GEIS). It briefly*
4 *discusses the proposed action, alternatives to the proposed action, the environmental impacts*
5 *of the proposed action and alternatives (including the NRC’s analysis of spent fuel pool leaks*
6 *and fires), and the major conclusions and the NRC’s preliminary recommendation to the*
7 *Commission. The summary ends with next steps in the Waste Confidence rulemaking and how*
8 *the public can comment on the draft GEIS and proposed Waste Confidence rule.*

9 **ES.1 What is Waste Confidence?**

10 Historically, Waste Confidence has been the NRC’s generic
11 determination regarding the safety and environmental
12 impacts of storing spent nuclear fuel (spent fuel) beyond the
13 licensed life for operations of a nuclear power plant. The
14 Commission has incorporated the generic determination in
15 its regulations at Title 10 of the *Code of Federal Regulations*
16 (CFR) 51.23, which satisfied the NRC’s obligations under
17 the National Environmental Policy Act of 1969, as amended,
18 (NEPA) with respect to the continued storage of spent fuel
19 for commercial reactor licenses, license renewals, and spent fuel storage facility licenses and
20 license renewals.

Waste Confidence applies to the storage of spent fuel *after* the end of the licensed life for operations of a nuclear reactor and *before* final disposal in a permanent repository. This timeframe is referred to as “*continued storage*” throughout this draft GEIS.

21 **ES.2 Why has the NRC Developed a Draft Generic** 22 **Environmental Impact Statement?**

23 Since the Waste Confidence rule was
24 originally developed in 1984, the NRC has
25 periodically updated the rule, with the last
26 update completed in 2010. A number of
27 parties challenged the 2010 Waste
28 Confidence rule in court, and in June 2012,
29 the Court of Appeals for the District of
30 Columbia (D.C.) Circuit ruled that the
31 2010 Waste Confidence rulemaking did not
32 satisfy the NRC’s NEPA obligations. The
33 Court identified deficiencies in the
34 2010 Waste Confidence rule and supporting

To comply with **The National Environmental Policy Act of 1969 (NEPA)** Federal agencies:

- assess the environmental impacts of major Federal actions
- consider the environmental impacts in making decisions
- disclose the environmental impacts to the public

The Waste Confidence rulemaking is a major Federal action that requires a NEPA review.

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1 decision related to the NRC’s environmental analysis of spent fuel pool fires and leaks, and the
2 environmental impacts should a repository not become available.

3 In response to the Court’s ruling, the Commission decided that the NRC would not issue any
4 final licenses that relied upon the Waste Confidence rule until the NRC addresses the
5 deficiencies identified by the Court (Commission Order CLI–12–16). The Commission also
6 directed the staff to develop an updated Waste Confidence decision and rule supported by an
7 environmental impact statement. The staff has prepared this draft GEIS to satisfy its NEPA
8 obligations regarding the impacts of continued storage of spent fuel. The draft GEIS provides a
9 regulatory basis for the proposed revision of the Waste Confidence rule. Chapter 1 of the draft
10 GEIS provides a more detailed discussion of the history of Waste Confidence rulemaking.

11 **ES.3 What is the Proposed Action Being Addressed in this** 12 **Draft GEIS?**

13 The proposed action is to issue a rule,
14 10 CFR 51.23, that generically addresses the
15 environmental impacts of continued spent fuel
16 storage by incorporating into rule the conclusions of
17 the final version of this draft GEIS. If the proposed
18 Rule is adopted, the site-specific NEPA analyses for
19 future commercial power reactor and spent fuel
20 storage facility licensing actions would not need to
21 consider the environmental impacts of continued
22 storage.

23 **ES.4 What is the Purpose and** 24 **Need for the Proposed** 25 **Action?**

26 The purpose and need for the proposed action are identified below:

- 27 1. to improve the efficiency of the NRC’s licensing process by generically addressing the
28 environmental impacts of continued storage
- 29 2. to prepare a single document that reflects the NRC’s current understanding of these
30 environmental impacts
- 31 3. to address the deficiencies in the 2010 Waste Confidence rule identified by the U.S. Court of
32 Appeals for the D.C. Circuit

Why is the NRC evaluating Waste Confidence on a generic basis?

The NRC considers the continued storage of spent fuel a generic activity that is similar for all commercial nuclear power plants and storage facilities. Therefore, a generic analysis is an appropriate, effective, and efficient method of evaluating the environmental impacts of continued storage. Other examples of NRC generic environmental evaluations include the License Renewal GEIS (NUREG–1437), the Decommissioning GEIS (NUREG–0586), and the In-Situ Leach Uranium Milling Facilities GEIS (NUREG–1910).

1 **ES.5 What is Covered in the Draft GEIS?**

2 The draft GEIS analyzes the environmental impacts of continued storage of spent fuel. The
3 NRC has looked at the direct, indirect, and cumulative effects of continued storage for three
4 spent fuel storage timeframes—short-term, long-term, and indefinite. These timeframes are
5 defined below and are discussed in more detail in Section 1.8.2 of the draft GEIS. The
6 analyses contained in this draft GEIS provide a regulatory basis for the proposed revisions to
7 10 CFR 51.23.

8 **ES.6 What is Not Covered in the Draft GEIS?**

9 The NRC is evaluating the continued storage of commercial spent fuel in this draft GEIS. Thus,
10 certain topics are not addressed because they are not within the scope of this review. These
11 topics include:

- 12 • noncommercial spent fuel (e.g., defense waste)
- 13 • commercial high-level waste generated from reprocessing
- 14 • Greater-than-Class-C waste
- 15 • foreign spent fuel stored in the United States
- 16 • nonpower reactor spent fuel (e.g., test and research reactors, including foreign generated
17 fuel stored in the United States)
- 18 • need for nuclear power
- 19 • reprocessing of commercial spent fuel

20 **ES.7 Are There Alternatives to the Waste Confidence 21 Rulemaking?**

22 Alternatives to the proposed action, a revision to the Waste Confidence rule, are discussed in
23 Section 1.6 of the draft GEIS. The NRC looked at the following three alternatives to revising the
24 Waste Confidence rule:

- 25 1. *The No-Action Alternative.* The NRC would take no action to generically address the
26 environmental impacts of continued storage and, instead, would address the environmental
27 impacts of continued storage in individual, site-specific licensing reviews.
- 28 2. *The GEIS-Only Alternative.* The NRC would prepare a GEIS to analyze the environmental
29 impacts of continued storage that would then support site-specific licensing reviews. There
30 would be no Waste Confidence rule, so site-specific EISs or environmental assessments
31 would incorporate the GEIS by reference or adopt the conclusions in the GEIS.

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1 3. *The Policy Statement Alternative*. The Commission would issue a policy statement that
2 expresses the Commission's intent to either adopt or incorporate the environmental impacts
3 in the GEIS into site-specific NEPA actions or to prepare a site-specific evaluation for each
4 NRC licensing action.

5 The NRC determined that the environmental impacts of these three alternatives were essentially
6 the same because, in each alternative, the NRC would analyze the environmental impacts of
7 continued storage. The NRC's preliminary conclusion is to revise 10 CFR 51.23 because of the
8 efficiencies that would be gained in reactor and spent fuel storage facility licensing reviews.
9 Revising the Waste Confidence rule minimizes expenditures on site-specific reviews, limits the
10 potential for lengthy project delays, and provides for the same level of environmental protection
11 as the other alternatives.

12 During the scoping period for the draft GEIS, the NRC
13 received many suggested alternatives to the Waste
14 Confidence rulemaking, including calls for halting NRC
15 licensing activities and shutting down operating reactors
16 or imposing new requirements on nuclear power plants,
17 such as storing spent fuel in special hardened onsite
18 storage, reducing spent fuel pool density, and
19 accelerating the transfer of spent fuel from pools to dry
20 casks. The NRC determined that halting NRC licensing
21 and closing nuclear reactors would not meet the purpose
22 and need of the proposed rulemaking action. The NRC also determined that additional
23 requirements on spent fuel storage would not meet the purpose and need. Further, the draft
24 GEIS is a NEPA review and not a licensing action; therefore, this draft GEIS would not be the
25 appropriate activity in which to mandate new spent fuel storage requirements.

The Waste Confidence rulemaking is not a licensing action. It does not permit a nuclear power plant or any other facility to operate or store spent fuel. Every nuclear power plant or specifically licensed spent fuel storage facility must undergo an environmental review as part of its site-specific licensing process.

26 **ES.8 Did the NRC Involve the Public or Governmental** 27 **Organizations?**

28 The NRC announced that it was
29 planning to develop an EIS and
30 requested comments on the proposed
31 scope of the draft GEIS in a *Federal*
32 *Register* Notice that was published on
33 October 25, 2012 (77 FR 65137).
34 Publication of this notice began a
35 70-day public comment period for
36 scoping. The NRC also issued press
37 releases, sent scoping letters to Tribal governments and State liaisons, and sent e-mails to

At the end of the 70-day scoping period, the NRC summarized what it heard and responded to public comments in its *Scoping Summary Report*, which can be accessed at <http://pbadupws.nrc.gov/docs/ML1306/ML13060A128.pdf>.

A separate document at <http://pbadupws.nrc.gov/docs/ML1306/ML13060A130.pdf> lists the comments the NRC received, organized by category.

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1 approximately 1,050 stakeholders who had previously expressed interest in matters related to
2 high-level waste. The NRC conducted four public scoping meetings that were all accessible via
3 Internet and telephone, so people from all over the country could participate and give their
4 comments on the scope of the Waste Confidence draft GEIS. In November 2012, the NRC met
5 with representatives of the U.S. Environmental Protection Agency (EPA) to discuss the Waste
6 Confidence rulemaking. The NRC also held a government-to-government meeting with the
7 Prairie Island Indian Community in June 2013. Future meetings with these groups are also
8 planned. There are no formal cooperating agencies identified in the Waste Confidence
9 environmental review.

10 Section 1.7, Appendix A, and Appendix C of the draft GEIS discuss public and agency
11 involvement in the Waste Confidence environmental review. The Scoping Summary report also
12 provides information about the NRC's scoping activities and what the NRC heard during the
13 scoping process.

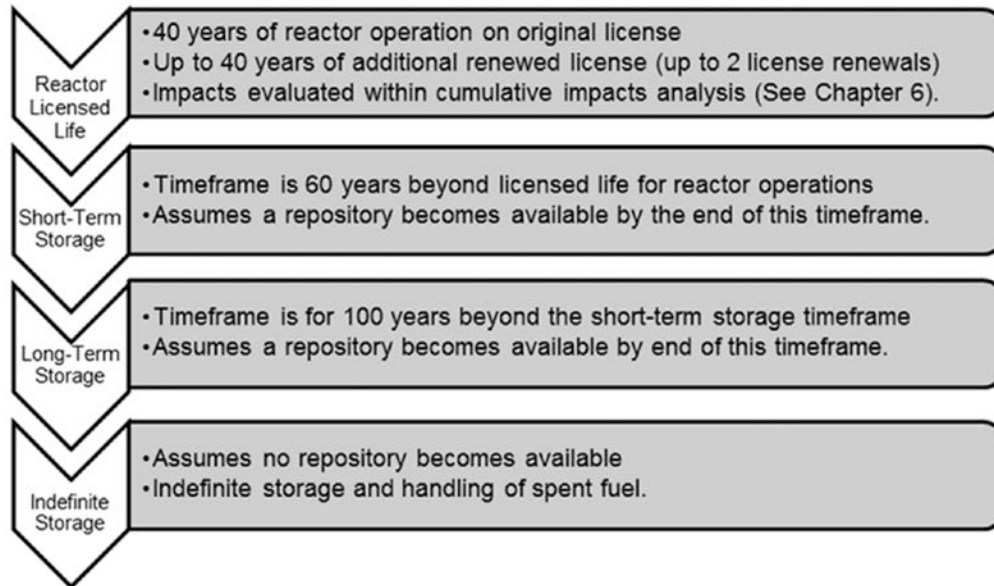
14 **ES.9 How did the NRC Evaluate the Continued Storage of** 15 **Spent Fuel in this Draft GEIS?**

16 The NRC looked at potential environmental impacts of continued storage in three timeframes:
17 short-term storage, long-term storage, and indefinite storage (see Figure ES-1). The short-term
18 and long-term storage timeframes include an assumption that a permanent geologic repository
19 becomes available by the end of those timeframes. The indefinite storage timeframe assumes
20 that a repository never becomes available. For a detailed discussion of the three timeframes,
21 see Section 1.8.2 of the draft GEIS.

22 As discussed above and in the draft GEIS, the NRC has analyzed three timeframes that
23 represent various scenarios for the length of continued storage that will be needed before spent
24 fuel is sent to a repository. The first, most likely, timeframe is the short-term timeframe, which
25 analyzes 60 years of continued storage after the end of a reactor's licensed life for operation.
26 The NRC acknowledges, however, that the short-term timeframe, although the most likely, is not
27 certain. Accordingly, the draft GEIS also analyzed two additional timeframes. The long-term
28 timeframe considers the environmental impacts of continued storage for a total of 160 years
29 after the end of a reactor's licensed life for operation. Finally, although the NRC considers it
30 highly unlikely, the draft GEIS includes an analysis of an indefinite timeframe, which assumes
31 that a repository does not become available.

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2 **Figure ES-1.** Three Storage Timeframes Addressed in the Waste Confidence Draft GEIS
3 (Short-Term, Long-Term, and Indefinite Storage) and the Major Assumptions for
4 Each Timeframe

5 To guide its analysis, the NRC also relied upon certain
6 assumptions regarding the storage of spent fuel. A
7 detailed discussion of these assumptions is contained
8 in Section 1.8.3 of the draft GEIS. Some of these
9 assumptions are listed below:

- 10 • Institutional controls would be in place.
- 11 • Spent fuel canisters and casks would be replaced
12 approximately once every 100 years.
- 13 • Independent spent fuel storage installation (ISFSI)
14 and dry transfer system (DTS) facilities would also
15 be replaced approximately once every 100 years.
- 16 • A DTS would be built at each ISFSI location for
17 fuel repackaging.
- 18 • All spent fuel would be moved from spent fuel
19 pools to dry storage by the end of the short-term
20 storage timeframe (60 years).
- 21 • The analyses in the draft GEIS are based on current technology and regulations.

An ISFSI (independent spent fuel storage installation) is a facility designed and constructed for the interim storage of spent fuel. Typically, spent fuel is stored in dry cask storage systems. In accordance with NRC requirements, dry cask storage shields people and the environment from radiation and keeps the spent fuel inside dry and nonreactive.

A *dry transfer system* would be built at ISFSI sites (at-reactor or away-from-reactor) in the long-term storage timeframe. A DTS would enable retrieval of spent fuel for inspection or repackaging without the need to return the spent fuel to a spent fuel pool.

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1 The NRC used previous environmental evaluations and technical reports to help inform the
2 impact determinations in this draft GEIS. Chapter 1 of the draft GEIS includes a list of NEPA
3 documents used in the development of the draft GEIS, and the end of each chapter includes a
4 complete list of references. References are publicly available, and most are available in the
5 NRC's Agencywide Documents Access and Management System (ADAMS).

6 The ADAMS electronic public reading room is available at <http://www.nrc.gov/reading->
7 [rm/adams.html](http://www.nrc.gov/reading-room/adams.html). If you encounter issues accessing ADAMS, call the NRC at 1-800-397-4209 or
8 301-415-4737, or send an e-mail to pdr.resource@nrc.gov.

9 **ES.10 What Facilities and Activities are Addressed in the** 10 **Draft GEIS?**

11 Chapter 2 of the draft GEIS describes typical facility
12 characteristics and activities that the NRC used to assess
13 the environmental impacts of continued storage of spent
14 fuel. The draft GEIS looked at spent fuel storage at single-
15 and multiple-reactor nuclear power plant sites, in spent fuel
16 pools, at-reactor ISFSIs, and away-from-reactor ISFSIs. In
17 addition to existing reactor designs and conventional spent
18 fuel, the NRC also considered reactor and fuel technologies
19 such as mixed oxide fuel (MOX) and small modular
20 reactors.

21 Section 2.2 of the draft GEIS describes the activities related
22 to the storage of spent fuel that are expected to occur
23 during the three storage timeframes (short-term, long-term,
24 and indefinite):

- 25 • The *short-term storage* timeframe (60 years beyond the
26 licensed life for operation of the reactor) includes routine
27 maintenance and monitoring of the spent fuel pool and
28 ISFSI and transferring spent fuel from pools to dry cask storage. Because decommissioning
29 is normally completed within 60 years after a reactor shuts down, the NRC assumes that all
30 spent fuel will be moved from spent fuel pools to dry cask storage by the end of the short-
31 term storage timeframe. For an away-from-reactor ISFSI, this timeframe includes
32 construction and operation, including routine maintenance and monitoring, at the facility.
- 33 • The *long-term storage* timeframe (100 years beyond the initial 60-year (short-term) storage
34 timeframe) includes activities such as continued facility maintenance, construction and
35 operation of a DTS, and replacement of ISFSI and DTS facilities, including casks.

MOX (mixed oxide fuel) is a type of nuclear reactor fuel that contains plutonium oxide mixed with either natural or depleted uranium oxide, in ceramic pellet form. This fuel differs from conventional nuclear fuel, which is made of pure uranium oxide.

Small Modular Reactors are nuclear power plants smaller in size (e.g., 300 MW(e)) than current generation baseload plants (1,000 MW(e) or higher). These compactly designed reactors are factory-fabricated and can be transported by truck or rail to a nuclear power site.

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- 1 • *Indefinite storage* (i.e., no repository is available) assumes that the activities associated with
2 long-term storage continue indefinitely, with ISFSI and DTSs facilities being replaced at
3 least once every 100 years.

4 The NRC also looked at ongoing regulatory activities that could affect the continued storage of
5 spent fuel, including regulatory changes resulting from lessons learned from the September 11,
6 2001, terrorist attacks and the March 11, 2011, earthquake and tsunami in Japan. Appendix B
7 of the draft GEIS discusses a number of ongoing regulatory program reviews that ensure the
8 safety and security of spent fuel storage and transportation.

9 **ES.11 How did the NRC Describe Environmental Impacts?**

10 NRC used terms in other NEPA documents, such as those for license renewal or new reactors,
11 for defining the standard of significance for assessing environmental issues.

12 SMALL—Environmental effects are not detectable or are so minor that they will
13 neither destabilize nor noticeably alter any important attribute of the resource.

14 MODERATE—Environmental effects are sufficient to alter noticeably, but not to
15 destabilize, important attributes of the resource.

16 LARGE—Environmental effects are clearly noticeable and are sufficient to
17 destabilize important attributes of the resource.

18 For *risk-based determinations* (such as in the NRC's
19 analyses of severe accidents such as spent fuel pool
20 fires), the probability of occurrence as well as the
21 potential consequences have been factored into the
22 determination of significance.

23 For some resource areas, the impact determination
24 language is specific to the authorizing regulation (e.g.,
25 “not likely to adversely impact” for endangered
26 species).

NRC's concept of risk combines the *probability* of an accident with the *consequences of that accident*. In other words, the NRC examines the following questions:

- What can go wrong?
- How likely is it?
- What would be the consequences?

More information can be found at
<http://www.nrc.gov/about-nrc/regulatory/risk-informed.html>.

1 **ES.12 What Environmental Resource Areas did the NRC**
 2 **Consider?**

3 Chapter 3 of the draft GEIS discusses the environment that exists at and around the facilities
 4 where spent fuel is stored in spent fuel pools and at-reactor ISFSIs. The description of
 5 resources in Chapter 3 provides information that is incorporated into the analyses of
 6 environmental impacts of continued storage in Chapter 4 (at-reactor impacts) and Chapter 6
 7 (cumulative impacts). The License Renewal GEIS (NUREG–1437, Volumes 1 and 2, Revision
 8 1) was the primary source of information in Chapter 3. The NRC also referenced information
 9 from site-specific environmental reviews, such as those for initial and renewal ISFSI licenses,
 10 the renewal of operating licenses, and operating licenses for new reactors.

11 The affected resource areas and attributes discussed in the draft GEIS are listed in Table ES-1.

12 **Table ES-1.** Affected Resource Areas for At-Reactor Spent Fuel Storage

Affected Resource Area	Attributes
Land Use	Site areas and land requirements for operating nuclear power plants; land requirements for at-reactor ISFSIs; general land characteristics and coverage; land use in the vicinity of nuclear power plants; locations of nuclear power plants
Socioeconomics	Regional social, economic, and demographic conditions around nuclear power plant sites, including employment, taxes, public services, housing demand, and traffic
Environmental Justice	Human health and environmental effects; the presence of minority and low-income populations; subsistence consumption of fish and wildlife.
Climate and Air Quality	Local and regional climate and air quality, including criteria pollutants and greenhouse gases
Geology and Soils	The physical setting of nuclear power plants and associated geologic strata and soils; different physiographic provinces in the United States.
Water Resources	Surface-water and groundwater use and quality; existing radioactive leaks at nuclear power plants and tritium contamination of groundwater
Ecological Resources	Terrestrial and aquatic resources, including varied habitat such as wetlands and floodplains, wildlife, aquatic organisms, and threatened, endangered, and protected species and habitat.
Historic and Cultural Resources	Description of historic and cultural resources that could occur at nuclear power plant sites; compliance with Section 106 of the National Historical Preservation Act of 1966
Noise	Ambient noise levels around existing spent fuel storage sites.
Aesthetics	The existing scenic quality of spent fuel storage sites, including viewsheds with water bodies, topographic features, other visual landscape characteristics

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1 **Table ES-1.** Affected Resource Areas for At-Reactor Spent Fuel Storage (cont'd)

Affected Resource Area	Attributes
Waste Management	Wastes generated by continued storage of spent fuel, including low-level radioactive waste, hazardous waste, mixed waste, nonradioactive/nonhazardous waste; pollution prevention; and waste minimization
Transportation	Transportation characteristics of reactor sites; workers involved in transportation activities; local, regional, and national transportation networks; populations that use them.
Public and Occupational Health	NRC requirements for radiological protection of the public and workers from the continued storage of spent fuel; public radiation doses from natural and artificial sources; regulatory framework for occupational hazards.

2 The affected environment and potential impacts of continued storage at an away-from-reactor
 3 ISFSI are discussed in Chapter 5 (away-from-reactor impacts). The analysis of away-from-
 4 reactor spent fuel storage in Chapter 5 is based, in general, on the description of the affected
 5 environment provided in Chapter 3. However, some aspects of those discussions would not be
 6 applicable, or would not be applicable in the same way, for an away-from-reactor ISFSI. The
 7 affected resource areas and attributes discussed in Chapter 5 of the draft GEIS are listed in
 8 Table ES-2.

9 **Table ES-2.** Affected Resource Areas for Away-From-Reactor Spent Fuel Storage

Affected Resource Area	Attributes
Land Use	Site areas and land requirements for an away-from-reactor ISFSI to store 40,000 MTU; general land characteristics and coverage
Socioeconomics	Regional social, economic, and demographic conditions around locations meeting the siting evaluation factors of 10 CFR Part 72, Subpart E, including employment, taxes, public services, housing demand, and traffic
Environmental Justice	The potential presence of minority and low-income populations; subsistence consumption of fish and wildlife around locations meeting the siting evaluation factors of 10 CFR Part 72, Subpart E.
Climate and Air Quality	Local and regional climate and air quality, including criteria pollutants and greenhouse gases
Geology and Soils	The physical setting of locations meeting the siting evaluation factors of 10 CFR Part 72, Subpart E and associated geologic strata and soils; the different physiographic provinces in the United States
Water Resources	Surface-water and groundwater use and quality around locations meeting the siting evaluation factors of 10 CFR Part 72, Subpart E

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1 **Table ES-2.** Affected Resource Areas for Away-From-Reactor Spent Fuel Storage (cont'd)

Affected Resource Area	Attributes
Ecological Resources	Terrestrial and aquatic resources, including varied habitat such as wetlands and floodplains, wildlife, aquatic organisms, and threatened, endangered, and protected species and habitat
Historic and Cultural Resources	A description of historic and cultural resources, including traditional cultural properties; compliance with the National Historical Preservation Act of 1966, Section 106; results of a historic and cultural resources survey for the Private Fuel Storage, LLC, application for an away-from-reactor ISFSI
Noise	Ambient noise levels around general construction sites and as discussed in the Private Fuel Storage, LLC, application for an away-from-reactor ISFSI
Aesthetics	The existing scenic quality of locations meeting the siting evaluation factors of 10 CFR Part 72, Subpart E, including viewsheds with water bodies, topographic features, or other visual landscape characteristics
Waste Management	Wastes generated by continued storage of spent fuel, including low-level radioactive waste, hazardous waste, mixed waste, nonradioactive/nonhazardous waste; pollution prevention and waste minimization
Transportation	Transportation characteristics of locations meeting the siting evaluation factors of 10 CFR Part 72, Subpart E; workers involved in transportation activities; local, regional, and national transportation networks and populations that use them
Public and Occupational Health	NRC requirements for radiological protection of the public and workers from the continued storage of spent fuel; public radiation doses from natural and artificial sources; the regulatory framework for occupational hazards.

2 **ES.13 What are the Environmental Effects of Continued**
3 **Storage?**

4 Chapter 4 of the draft GEIS addresses potential environmental impacts of at-reactor continued
5 storage in spent fuel pools and at-reactor ISFSIs. Chapter 5 addresses impacts at away-from-
6 reactor ISFSIs. As applicable for each resource area, impact determinations were made for
7 each of the three spent fuel storage timeframes: short-term, long-term, and indefinite. The
8 following pages provide a short synopsis of impacts, followed by summary tables (Tables ES-3
9 and ES-4). At-reactor impacts of continued storage are addressed first, followed by away-from-
10 reactor impacts.

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1 **ES.13.1 Environmental Impacts of At-Reactor Spent Fuel Storage**

2 **ES.13.1.1 Land Use**

3 *Short-Term Storage.* Impacts would be SMALL. Sixty years of continued at-reactor storage in a
4 spent fuel pool or ISFSI would not require disturbance of any new land or result in operational or
5 maintenance activities that would change land use.

6 *Long-Term Storage.* Impacts would be SMALL. Long-term storage at an at-reactor ISFSI
7 would not result in operational or maintenance activities that would change land-use conditions.
8 Construction of a DTS and replacement of an ISFSI and a DTS after 100 years would impact a
9 small fraction of the land committed for a nuclear power plant.

10 *Indefinite Storage.* Impacts would be SMALL. Impacts would be similar to long-term impacts—
11 a small fraction of land would be impacted and land-use conditions would not change. Older
12 ISFSIs and DTS facilities would be demolished, and that land would be reclaimed or reused as
13 part of the cyclic replacements.

14 **ES.13.1.2 Socioeconomics**

15 *Short-Term Storage.* Impacts would be SMALL. A small number of workers would be required
16 to maintain and monitor spent fuel pools and an at-reactor ISFSI, tax payments to local
17 jurisdictions would continue, and there would be no increased demand for housing and public
18 services.

19 *Long-Term Storage.* Impacts would be SMALL. The construction of a DTS would take about
20 1 to 2 years and the size of the construction and ISFSI replacement and operations workforce
21 would be small. Tax payments would continue and would remain relatively constant at post-
22 operations levels. Additionally, there would be no increased demand for housing and public
23 services.

24 *Indefinite Storage.* Impacts would be SMALL. Impacts would be similar to those described for
25 long-term storage. The workforce required for monitoring and replacement of DTS facilities and
26 ISFSIs would be small. Property tax revenue would continue as long as spent fuel remains
27 onsite.

28 **ES.13.1.3 Environmental Justice**

29 *Short-Term Storage.* Continued maintenance and monitoring of spent fuel pools and at-reactor
30 ISFSIs would have minimal human health and environmental effects on minority and low-
31 income populations. As previously discussed for other resource areas, the overall contributory
32 human health and environmental effects from continued short-term spent fuel storage would be

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1 limited in scope and SMALL for all populations. Therefore, minority and low-income populations
2 are not expected to experience disproportionately high and adverse human health and
3 environmental effects from the continued short-term storage of spent fuel.

4 *Long-Term Storage.* The continued maintenance and monitoring of spent fuel in at-reactor
5 ISFSIs would have minimal human health and environmental effects on minority and low-
6 income populations near these storage facilities. As previously discussed for other resource
7 areas, the overall contributory human health and environmental effects from continued long-
8 term spent fuel storage would be limited in scope and SMALL for all populations, except for
9 historic and cultural resources where impacts could be SMALL, MODERATE, or LARGE. The
10 magnitude of adverse effect on historic properties and impact on historic and cultural resources
11 largely depend site-specific conditions. Measures such as implementation of historic and
12 cultural resource plans and procedures, agreements, and license conditions can be used to
13 avoid, minimize, or mitigate adverse effects. Therefore, minority and low-income populations
14 are not expected to experience disproportionately high and adverse human health and
15 environmental effects from the continued long-term storage of spent fuel.

16 *Indefinite Storage.* The indefinite maintenance and monitoring of spent fuel in at-reactor ISFSIs
17 would have minimal human health and environmental effects on minority and low-income
18 populations near these storage facilities. As previously discussed for the other resource areas,
19 the overall contributory human health and environmental effects from the indefinite storage of
20 spent fuel storage would be limited in scope and SMALL for all populations, except for historic
21 and cultural resources where impacts could be SMALL, MODERATE, or LARGE. If
22 replacement activities occur in previously disturbed areas, then impacts to historic and cultural
23 resources would be SMALL. Therefore, historic properties would not be adversely affected. If
24 construction activities occur in previously undisturbed areas or avoidance is not possible, then
25 there could be adverse effects to historic properties, and impacts to historic and cultural
26 resources could be SMALL, MODERATE, or LARGE depending on site-specific factors.
27 Minority and low-income populations are not expected to experience disproportionately high and
28 adverse human health and environmental effects from the indefinite storage of spent fuel.

29 **ES.13.1.4 Air Quality**

30 *Short-Term Storage.* Impacts would be SMALL. Air emission impacts from spent fuel storage
31 activities from spent fuel pools and ISFSI during short-term storage would be substantially
32 smaller than air emissions during power generation. Heat released to the atmosphere from the
33 dry casks would not be different than temperature changes that occur naturally.

34 *Long-Term Storage.* Impacts would be SMALL. Construction of a DTS, ongoing operation and
35 maintenance of the storage facilities, and replacement of an ISFSI and DTS after 100 years
36 would result in minor and temporary air emissions. Heat released to the atmosphere from the
37 dry casks would decrease throughout this period as decay heat diminishes.

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1 *Indefinite Storage.* Impacts would be SMALL. Impacts would be similar to those for long-term
2 storage ISFSI and DTS operation and replacement activities would result in minor and
3 temporary air emissions. Heat released to the atmosphere from the dry casks would decrease
4 as the spent fuel cools over time.

5 **ES.13.1.5 Climate Change**

6 *Short-Term Storage.* Impacts would be SMALL. The
7 annual level of greenhouse gases generated during
8 continued storage is a small percentage of the annual
9 levels generated in the United States.

Greenhouse gases are gases that trap heat in the atmosphere. The most common greenhouse gases are carbon dioxide, methane, nitrous oxide, and fluorinated gases. Greenhouse gases contribute to global climate change.

10 *Long-Term Storage.* Impacts would be SMALL.
11 Impacts would be similar to short-term impacts, and greenhouse gas emissions would be a
12 small fraction of the overall level in the United States.

13 *Indefinite Storage.* Impacts would be SMALL. Greenhouse gas emissions would continue to
14 be similar to long-term impacts; they would be a small fraction of the overall level in the
15 United States.

16 **ES.13.1.6 Geology and Soils**

17 *Short-Term Storage.* Impacts would be SMALL. Continued spent fuel pool operation is not
18 expected to increase impacts to soil and geology. Impacts to soil from small spills and leaks
19 during operation and maintenance of ISFSIs would be minor because of monitoring and
20 environmental protection regulations. No new land would be disturbed for continued operation
21 of spent fuel pools and ISFSIs.

22 *Long-Term Storage.* Impacts would be SMALL. Construction, operation, and replacement of
23 the DTS and ISFSI would have minimal impacts to soils on the small fraction of land committed
24 for the facilities, including soil compaction, soil erosion, and potential leaks of oils, greases, and
25 other construction materials. Ongoing operation and maintenance of ISFSIs and DTSs would
26 not be expected to have any additional impacts above those associated with construction. No
27 impacts to geology would be expected.

28 *Indefinite Storage.* Impacts would be SMALL. Impacts would be similar to those for long-term
29 storage. Replacement of ISFSIs and DTS facilities would occur on previously disturbed land
30 and would minimize impacts to soils and geology.

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1 **ES.13.1.7 Surface-Water Quality and Use**

2 *Short-Term Storage.* Impacts would be SMALL. Although unlikely, groundwater contamination
3 could affect surface-water quality (see discussion in Appendix E of the draft GEIS). Potential
4 impacts to surface-water quality and consumptive use from the continued operation of spent fuel
5 pools and ISFSIs would be less than for normal plant operations.

6 *Long-Term Storage.* Impacts would be SMALL. Potential consumptive-use and surface-water
7 quality impacts from construction and operation of a DTS would be minor, and replacement of
8 the DTS and ISFSI would be less intense than assumed for initial construction of these facilities.

9 *Indefinite Storage.* Impacts would be SMALL. Impacts would be similar to those for long-term
10 storage. Replacement of ISFSIs and DTS facilities once every 100 years would result in
11 temporary and minimal impacts to surface-water quality and use.

12 **ES.13.1.8 Groundwater Quality and Use**

13 *Short-Term Storage.* Impacts would be SMALL. Groundwater use would be significantly less
14 than that used during reactor operations. Continued storage of spent fuel could result in
15 nonradiological and radiological impacts to groundwater quality, including tritium contamination.
16 Appendix E of the draft GEIS contains additional supporting analysis of the environmental
17 impacts from spent fuel pool leaks. The analysis concludes that (1) there is a low probability of
18 a leak of sufficient quantity and duration to affect offsite locations and (2) site hydrologic
19 characteristics and monitoring programs ensure that impacts from spent fuel pool leaks would
20 be unlikely. Impacts to groundwater from continued storage in ISFSIs would be minimal
21 because ISFSI storage requires minimal water and produces minimal, localized, and easy-to-
22 remediate liquid effluents on or near ground surface.

23 *Long-Term Storage.* Impacts would be SMALL. Construction of a DTS would require minimal
24 groundwater use. With regard to storage facility-replacement activities, groundwater
25 consumptive use and quality impacts would be similar to those for initial construction of the
26 facilities, and would be minor and temporary.

27 *Indefinite Storage.* Impacts would be SMALL. Impacts would be similar to those for long-term
28 storage. Once every 100 years, groundwater would be required for demolishing and replacing
29 the ISFSI and DTS facilities. Consumptive use of groundwater and water-quality impacts would
30 be minor and temporary.

31 **ES.13.1.9 Terrestrial Resources**

32 *Short-Term Storage.* Impacts would be SMALL. Impacts associated with the operation of spent
33 fuel pools would likely be bounded by the impacts analyzed in the License Renewal GEIS for

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1 those issues that were addressed generically in the License Renewal GEIS. For the issue of
2 water-use conflicts with terrestrial resources at plants with cooling ponds or cooling towers using
3 makeup water from a river, the NRC determined that the impacts from operating the spent fuel
4 pool during the short-term storage timeframe would be minimal, because the water withdrawal
5 requirements for spent fuel pool cooling are considerably lower than those for a power reactor.
6 Impacts associated with operating an at-reactor ISFSI would be minimal and similar to those
7 described in example Environmental Assessments reviewed for the GEIS.

8 *Long-Term Storage.* Impacts would be SMALL. Construction, repackaging, and replacement
9 activities for the ISFSI and DTS would have minimal impacts on terrestrial resources. Based on
10 a review of example Environmental Assessments, normal operations and replacement of DTS
11 and ISFSI facilities would not generate significant noise, would not significantly affect the area
12 available for terrestrial wildlife, and would not adversely impact terrestrial environments or their
13 associated plant and animal species.

14 *Indefinite Storage.* Impacts would be SMALL. Impacts would be similar to long-term storage
15 impacts. Replacement of the ISFSI and DTS facilities would likely occur on land near the
16 existing facilities and could be sited on previously disturbed ground and away from terrestrial
17 species and habitat.

18 **ES.13.1.10 Aquatic Ecology**

19 *Short-Term Storage.* Impacts would be SMALL. Impacts associated with the operation of spent
20 fuel pools would likely be minimal and bounded by the impacts analyzed in the License Renewal
21 GEIS because of the lower withdrawal rates, lower discharge rates, and smaller thermal plume
22 for a spent fuel pool compared to an operating reactor with closed-cycle cooling. Impacts from
23 operation of onsite ISFSIs would be minimal because ISFSIs do not require water for cooling,
24 and ground-disturbing activities would have minimal impacts on aquatic ecology.

25 *Long-Term Storage.* Impacts would be SMALL. Construction, repackaging, and replacement
26 activities for the ISFSI and DTS would have minimal impacts on aquatic resources. The ISFSI
27 and DTS would not require water for cooling, would produce minimal gaseous or liquid effluents,
28 and would have minimal impacts on aquatic resources.

29 *Indefinite Storage.* Impacts would be SMALL. Activities and impacts to aquatic resources
30 would be similar those described for long-term storage, although complete repackaging would
31 occur once every 100 years. Replacement of ISFSI and DTS facilities would occur on land near
32 existing facilities and could likely be sited on previously disturbed ground and away from
33 sensitive aquatic features.

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1 **ES.13.1.11 Special Status Species and Habitat**

2 *Short-Term Storage.* The Endangered Species Act
3 (ESA) has several requirements that would help ensure
4 protection of listed species and critical habitat beyond
5 the licensed term of the reactor during short-term
6 storage. In complying with the ESA, the NRC would
7 evaluate the impacts from spent fuel pool construction,
8 operations, and decommissioning in a site-specific
9 review before the spent fuel pool is initially constructed
10 and operated. ESA protection would continue during
11 the short-term storage timeframe. NRC would be
12 required to reinitiate consultation with the U.S. Fish and
13 Wildlife Service (FWS) or the National Marine Fisheries
14 Service (NMFS) if the cooling system parameters
15 change, if a “take” occurs for a species not included in
16 an incidental take permit, or if a new species is listed under the ESA. In addition, the NRC
17 would either need to continue to require the licensee to abide by the conditions described in the
18 Biological Opinion or reinitiate consultation.

Endangered Species Act, Section 7, called "Interagency Cooperation," is the mechanism by which Federal agencies ensure that the actions they take, including those they fund or authorize, do not jeopardize the existence of any listed species. Under Section 7, the NRC must consult with the U.S. Fish and Wildlife Service or National Marine Fisheries Service when any action NRC carries out, funds, or authorizes (such as through a permit) *may affect* a listed endangered or threatened species.

19 With regard to dry cask storage of spent fuel, given the small size and ability to site ISFSI
20 facilities away from sensitive ecological resources, the NRC concludes that continued storage of
21 spent fuel in at-reactor ISFSIs is not likely to adversely affect listed species or critical habitat. In
22 the unlikely situation that ISFSIs could affect listed species or critical habitat, the NRC would be
23 required to initiate consultation with the NMFS or the FWS.

24 *Long-Term Storage.* In addition to routine maintenance and monitoring of ISFSIs, impacts from
25 the construction of a DTS and replacement of the DTS and ISFSIs on special status species
26 and habitat would be minimal because of the small size of the ISFSI and DTS facilities and
27 because no water is required for cooling. NRC assumes that the ISFSI and DTS facilities could
28 be sited to avoid listed species and critical habitat because of the small size of the construction
29 footprint and sufficient amount of previously disturbed areas on most nuclear power plant sites.
30 Therefore, the NRC concludes that construction of a DTS and replacement of the DTS and
31 ISFSI that would occur during the long-term storage timeframe are not likely to adversely affect
32 listed species or critical habitat, or essential fish habitat. In the unlikely situation that the ISFSI
33 could affect listed species or critical habitat, the NRC would be required to initiate Section 7
34 ESA consultation with the NMFS or FWS for listed species or critical habitat, and consult with
35 the NMFS for essential fish habitat.

36 *Indefinite Storage.* Impacts from indefinite storage on special status species and habitat would
37 be minimal. The same consultation and any associated mitigation requirements described for
38 the short-term storage timeframe would apply to the construction of the DTS and replacement of

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1 the DTS and ISFSI facilities during indefinite storage. NRC concludes that the replacement of
2 the DTS and ISFSI that would occur during the indefinite storage timeframe is not likely to
3 adversely affect listed species or critical habitat, or essential fish habitat. In the unlikely
4 situation that the ISFSI could affect listed species or critical habitat, NRC would be required to
5 initiate Section 7 ESA consultation with NMFS or FWS (for listed species or critical habitat), and
6 consult NMFS (for essential fish habitat).

7 **ES.13.1.12 Historic and Cultural Resources**

8 *Short-Term Storage.* Impacts would be SMALL. Because no ground-disturbing activities are
9 anticipated during the short-term storage timeframe, impacts associated with continued
10 operations and maintenance would be SMALL. Therefore, there would be no impacts on
11 historic and cultural resources.

12 *Long-Term Storage.* Impacts could be SMALL, MODERATE, or LARGE. Impacts from
13 continued operations and routine maintenance during the long-term storage timeframe would be
14 similar to those described in the short-term storage timeframe. The impacts would be SMALL
15 because no ground-disturbing activities would occur. NRC authorization to construct and
16 operate a DTS and replace an at-reactor ISFSI and DTS would constitute Federal actions under
17 NEPA and would be undertakings under the National Historic Preservation Act of 1966 (NHPA).
18 In accordance with 36 CFR Part 800, a site-specific Section 106 review would be conducted for
19 each undertaking to determine whether historic properties are present in the area of potential
20 effect, and if so, whether these actions would result in any adverse effects upon these
21 properties. Impacts to historic and cultural resources would vary depending on what resources
22 are present. Resolution of adverse effects, if any, should be concluded prior to the closure of
23 the Section 106 process. Therefore, the potential impacts to historic and cultural resources
24 could be SMALL, MODERATE, or LARGE depending on site-specific factors.

25 *Indefinite Storage.* Impacts could be SMALL, MODERATE, or LARGE. If replacement activities
26 occur in previously disturbed areas (i.e., in areas that have previously experienced construction
27 impacts) then impacts to historic and cultural resources would be SMALL. Therefore, historic
28 properties would not be adversely affected. If construction activities occur in previously
29 undisturbed areas or avoidance is not possible, then there could be adverse effects to historic
30 properties, and impacts to historic and cultural resources could be SMALL, MODERATE, or
31 LARGE depending on site-specific factors.

32 **ES.13.1.13 Noise**

33 *Short-Term Storage.* Impacts would be SMALL. Spent fuel pool and dry cask storage noise
34 levels, noise duration, and distance between noise sources and receptors would generally not
35 be expected to produce noise impacts noticeable to the surrounding community.

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1 *Long-Term Storage.* Impacts would be SMALL. Construction of the DTS and replacement of
2 the DTS and ISFSI, although temporary and representing a small portion of the overall time
3 period for spent fuel storage, would generate noise levels that exceed EPA-recommended noise
4 levels. Noise from dry cask storage operations would be infrequent and at lower levels than for
5 construction or replacement activities. Generally, for spent fuel storage, the noise levels, noise
6 duration, and distance between the noise sources and receptors would not be expected to
7 produce noise impacts noticeable to the surrounding community.

8 *Indefinite Storage.* Impacts would be SMALL. Spent fuel casks resting on concrete pads are
9 essentially a passive activity that does not generate noise. The most noise would be generated
10 by construction equipment associated with the replacement of the ISFSI and DTS facilities, and
11 impacts would be similar to those during the long-term storage timeframe.

12 **ES.13.1.14 Aesthetics**

13 *Short-Term Storage.* Impacts would be SMALL. No changes to the visual profile are likely to
14 occur as a result of the continued operation and maintenance of the existing spent fuel pool and
15 at-reactor ISFSI.

16 *Long-Term Storage.* Impacts would be SMALL. Periodic construction, replacement, and
17 operation activities would not significantly alter the landscape of an ISFSI.

18 *Indefinite Storage.* Impacts would be SMALL. Impacts would be similar to long-term storage
19 and would not significantly alter the landscape of an ISFSI.

20 **ES.13.1.15 Waste Management**

21 *Short-Term Storage.* Impacts would be SMALL.
22 Continued at-reactor storage of spent fuel would
23 generate much less low-level, mixed, and
24 nonradioactive waste than an operating facility, and
25 licensees would continue to implement Federal and
26 State regulations and requirements regarding proper
27 management and disposal of wastes.

28 *Long-Term Storage.* Impacts would be SMALL.
29 The replacement of the ISFSI, repackaging of spent
30 fuel canisters, and construction, operation, and
31 replacement of the DTS is not expected to
32 significantly increase the low-level waste (LLW)
33 disposal capacity needed for reactor decommissioning, and LLW would continue to be managed
34 according to Federal regulations. The quantity of mixed waste generated from long-term

Low-level waste is a general term for a wide range of items that have become contaminated with radioactive material or have become radioactive through exposure to neutron radiation. The radioactivity in these wastes can range from just above natural background levels to much higher levels, such as seen in parts from inside the reactor vessel in a nuclear power reactor.

Mixed waste contains two components: low-level radioactive waste and hazardous waste, as defined in EPA regulations.

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1 storage would be a small fraction of that generated during the licensed life of the reactor.
2 Although large amounts of nonradioactive waste would be generated by replacement of dry
3 cask storage facilities, it would still be less than the waste generated during decommissioning
4 and would not likely have a noticeable impact on local or regional landfill capacity and
5 operations.

6 *Indefinite Storage.* Impacts would be SMALL to MODERATE. It is expected that sufficient LLW
7 disposal capacity would be made available when needed. A relatively small quantity of mixed
8 waste would be generated from indefinite storage and proper management and disposal
9 regulations would be followed. The amount of nonradioactive waste that would be generated
10 and impacts to nonradioactive waste landfill capacity is difficult to accurately estimate over an
11 indefinite storage timeframe.

12 **ES.13.1.16 Transportation**

13 *Short-Term Storage.* Impacts would be SMALL. A low volume of traffic and shipping activities
14 is expected with the continued storage of spent fuel in spent fuel pools and at-reactor ISFSIs.

15 *Long-Term Storage.* Impacts would be SMALL. There would be small workforce requirements
16 for continued storage and aging management activities (relative to the power plant workforce)
17 and a low frequency of supply shipments and shipments of LLW from DTS activities, continued
18 dry cask storage operations, and ISFSI and DTS replacement activities.

19 *Indefinite Storage.* Impacts would be SMALL. There would be no significant changes to the
20 annual magnitude of traffic or waste shipments that were identified for long-term storage.

21 **ES.13.1.17 Public and Occupational Health**

22 *Short-Term Storage.* Impacts would be SMALL. Annual
23 public and occupational doses would be maintained
24 below the annual dose limits established by 10 CFR
25 Part 72 for the public and 10 CFR Part 20 for
26 occupational personnel. Licensed facilities would also
27 be required by the above regulations to maintain an
28 as-low-as-reasonably-achievable (ALARA) program,
29 which would likely reduce the doses even further.

30 Appendix E of the draft GEIS provides additional information to support the environmental
31 impact determination with respect to leaks from spent fuel pools on public health. Public health
32 regulatory limits could be exceeded in the very unlikely event a spent fuel pool leak remained
33 undetected for long periods of time. Preventive maintenance activities would be conducted in
34 accordance with Occupational Safety and Health Agency requirements and risks to
35 occupational health and safety would be infrequent and minor.

ALARA is an acronym for "as low as (is) reasonably achievable," which means making every reasonable effort to maintain exposures to ionizing radiation as far below the dose limits as practical.

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1 *Long-Term Storage.* Impacts would be SMALL. Public
2 and occupational doses would be maintained well below
3 the dose limits established by 10 CFR Part 72 for the
4 public and 10 CFR Part 20 for occupational personnel.
5 Licensed facilities would also be required by these
6 regulations to maintain an ALARA program to ensure
7 radiation doses are maintained as low as is reasonably
8 achievable. Construction activities for the DTS would be
9 conducted in accordance with Occupational Safety and
10 Health Agency requirements, and once in operation, ISFSI preventive maintenance would be
11 infrequent and minor.

10 CFR Part 20 contains the NRC's radiation protection regulations.

10 CFR Part 72 contains the NRC's regulations for licensing storage facilities for spent fuel and other radioactive waste.

12 *Indefinite Storage.* Impacts would be SMALL. Impacts to public and occupation health are
13 expected to be similar to those from long-term spent fuel storage activities.

14 **ES.13.1.18 Environmental Impacts of Postulated Accidents**

15 *Design Basis Accidents in Spent Fuel Pools.* Impacts
16 would be SMALL. The postulated design basis
17 accidents considered in this draft GEIS for spent fuel
18 pools include hazards from natural phenomena, such as
19 earthquakes, floods, tornadoes, and hurricanes; hazards
20 from activities in the nearby facilities; and fuel handling-
21 related accidents. In addition, potential effects of climate
22 change are also considered. Based on the assessment
23 in Section 4.18, the environmental impacts of these postulated accidents involving continued
24 storage of spent fuel in pools are SMALL because all important safety structures, systems, and
25 components involved with the spent fuel storage are designed to withstand these design basis
26 accidents without compromising the safety functions.

A **design basis accident** is a postulated accident that a nuclear facility must be designed and built to withstand without loss to the systems, structures, and components necessary to ensure public health and safety.

27 *Design Basis Accidents in Dry Cask Storage Systems.* Impacts would be SMALL. All NRC-
28 licensed dry cask storage systems are designed to withstand all postulated design basis
29 accidents without any loss of safety functions. A DTS or a facility with equivalent capabilities
30 may potentially be needed to enable retrieval of spent fuel for inspection or repackaging.
31 Licensees of DTS facilities are required to design the facilities so that all safety-related
32 structures, systems, and components can withstand the design basis accidents without
33 compromising any safety functions. Based on the assessment, the environmental impact of the
34 design basis accidents is SMALL because safety-related structures, systems, and components
35 are designed to function in case of these accidents.

36 *Severe Accidents in Spent Fuel Pools.* Probability-weighted impacts would be SMALL. A spent
37 fuel pool may encounter severe events, such as loss of offsite power or beyond design basis

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1 earthquakes. Although it is theoretically possible that these events may lead to loss of spent
2 fuel pool cooling function resulting in spent fuel pool fire, the likelihood of such events is
3 extremely small. Additional discussion about spent fuel pool fires can be found in Appendix F.

4 *Severe Accidents in Dry Cask Storage Systems.* Probability-
5 weighted impacts would be SMALL. Although some handling
6 accidents such as a postulated drop of a canister could
7 exceed NRC's public dose standards, the likelihood of the
8 event is very low. Therefore, the environmental impact of
9 severe accidents in a dry storage facility is SMALL.

A **severe accident** is a type of accident that may challenge safety systems at a level much higher than expected.

10 **ES.13.1.19 Potential Acts of Sabotage or Terrorism**

11 The NRC finds that even though the environmental consequences of a successful attack on a
12 spent fuel pool beyond the licensed life for operation of a reactor are large, the very low
13 probability of a successful attack ensures that the environmental risk is SMALL. Similarly, for an
14 operational ISFSI during continued storage, the NRC finds that both the probability and
15 consequences of a successful attack are low, and therefore, the environmental risk is SMALL.
16 Therefore, the storage of spent fuel during continued storage will not constitute an unreasonable
17 risk to the public health and safety from acts of radiological sabotage, theft, or diversion of
18 special nuclear material. The environmental impacts of terrorism are an area of particular
19 controversy.

20 **Table ES-3.** Summary of Environmental Impacts of Continued At-Reactor Storage

Resource Area	Short-Term Storage	Long-Term Storage	Indefinite Storage
Land Use	SMALL	SMALL	SMALL
Socioeconomics	SMALL	SMALL	SMALL
Environmental Justice	No disproportionately high and adverse impacts	No disproportionately high and adverse impacts	No disproportionately high and adverse impacts
Air Quality	SMALL	SMALL	SMALL
Climate Change	SMALL	SMALL	SMALL
Geology and Soils	SMALL	SMALL	SMALL
Surface Water			
Quality	SMALL	SMALL	SMALL
Consumptive Use	SMALL	SMALL	SMALL
Groundwater			
Quality	SMALL	SMALL	SMALL
Consumptive Use	SMALL	SMALL	SMALL

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1 **Table ES-3.** Summary of Environmental Impacts of Continued At-Reactor Storage (cont'd)

Resource Area	Short-Term Storage	Long-Term Storage	Indefinite Storage
Terrestrial Resources	SMALL	SMALL	SMALL
Aquatic Ecology	SMALL	SMALL	SMALL
Special Status Species and Habitat	Impacts from the spent fuel pool would be determined as part of ESA Section 7 consultation; ISFSI operations are not likely to be adversely affected	Not likely to be adversely affected	Not likely to be adversely affected
Historic and Cultural Resources	SMALL	SMALL, MODERATE, or LARGE	SMALL, MODERATE, or LARGE
Noise	SMALL	SMALL	SMALL
Aesthetics	SMALL	SMALL	SMALL
Waste Management			
Low-Level Waste	SMALL	SMALL	SMALL
Mixed Waste	SMALL	SMALL	SMALL
Nonradioactive Waste	SMALL	SMALL	SMALL to MODERATE
Transportation	SMALL	SMALL	SMALL
Public and Occupational Health	SMALL	SMALL	SMALL
Accidents	SMALL	SMALL	SMALL
Sabotage or Terrorism	SMALL	SMALL	SMALL

2 **ES.13.2 Environmental Impacts of Away-From-Reactor Spent Fuel Storage**

3 No away-from-reactor ISFSIs of the size considered in Chapter 5 of the draft GEIS
 4 (40,000 metric tons uranium) have been constructed in the United States. For the analysis of
 5 environmental impacts in Chapter 5 of this draft GEIS, the NRC assumes that construction and
 6 operation of an away-from-reactor ISFSI would be similar to that proposed for the Private Fuel
 7 Storage Facility on the Reservation of the Skull Valley Band of Goshute Indians in Tooele
 8 County, Utah. The NRC analyzed the environmental impacts of constructing and operating
 9 Private Fuel Storage Facility in NUREG-1714 (Volumes 1 and 2).

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1 **ES.13.2.1 Land Use**

2 *Short-Term Storage.* Impacts would be SMALL. Construction of an ISFSI would change the
3 nature of land use within the site boundary and along access corridors. While this change
4 would be qualitatively substantial (e.g., from agricultural to industrial), the land parcel is
5 assumed to be sufficiently remote and small (when compared, for example, to any surrounding
6 county) that no quantitatively significant impact would occur.

7 *Long-Term Storage.* Impacts would be SMALL. Construction of a DTS would disturb a small
8 portion of the land committed for an away-from-reactor storage facility. To minimize land-use
9 impacts from replacement of the ISFSI and DTS facilities, the replacement facilities would likely
10 be constructed on land near the existing facilities, and the old facilities would likely be
11 demolished and the land reclaimed.

12 *Indefinite Storage.* Impacts would be SMALL. Only a small portion of the total land committed
13 for development of an away-from-reactor ISFSI is required to support continued operations,
14 including periodic maintenance or replacement of equipment and repackaging of fuel. As
15 mentioned previously, replacement of the away-from-reactor ISFSI and DTS every 100 years
16 would likely occur on land near the existing facilities.

17 **ES.13.2.2 Socioeconomics**

18 *Short-Term Storage.* Adverse impacts would be SMALL. Based on the small workforce
19 required for construction and operations of an away-from-reactor facility, and any associated
20 indirect impacts to public services, housing, and education, the impacts of construction and
21 operation of a storage facility on those resources would be minor. Beneficial impacts to the
22 economy would be LARGE in the local area.

23 *Long-Term Storage.* Adverse impacts would be SMALL. Construction of a DTS would require a
24 workforce smaller than the workforce required for construction of an away-from-reactor ISFSI.
25 The labor force required for maintenance and replacement activities of an ISFSI and DTS would
26 not be expected to exceed the labor force required for construction of the storage facility as a
27 whole. Beneficial impacts to the economy would be LARGE in the local area.

28 *Indefinite Storage.* Adverse impacts would be SMALL. If no repository becomes available,
29 operational and replacement activities would continue, beneficial impacts to the economy would
30 be LARGE in the local area.

31 **ES.13.2.3 Environmental Justice**

32 *Short-Term Storage.* Although it is possible that an away-from-reactor ISFSI could raise
33 concerns related to environmental justice, the process of siting and licensing such a project

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1 would be expected to ensure that these issues are addressed before a facility is licensed and
2 that there would be no significant environmental justice impacts.

3 *Long-Term Storage.* Because building a DTS is a much smaller project than building a nuclear
4 power plant and would occur within the ISFSI protected area, the impacts from construction of
5 the DTS would be within the envelope of impacts from the construction of the away-from-reactor
6 ISFSI. Because of the passive nature of operations and the temporary nature of any
7 construction associated with the DTS and the monitoring and maintenance of ISFSI pads and
8 dry casks, impacts on minority and low-income populations would not be disproportionately high
9 and adverse.

10 *Indefinite Storage.* The environmental impacts on minority and low-income populations if a
11 repository is not available to accept spent fuel, and away-from-reactor storage continues
12 indefinitely, are the same as the impacts for long-term storage. Impacts on minority and low-
13 income populations would not be disproportionately high and adverse.

14 **ES.13.2.4 Air Quality**

15 *Short-Term Storage.* Impacts would be SMALL to MODERATE. Construction of an away-from-
16 reactor ISFSI would result in minimal emissions, but construction of the rail spur could produce
17 temporary and localized impacts that would be noticeable. ISFSI operations generate minor
18 levels of air emissions but not enough to be classified as a “major stationary source” of
19 emissions as defined in Federal air quality regulations. Locomotives transporting spent fuel to
20 an away-from-reactor ISFSI would emit exhaust pollutants in a distributed manner along the
21 transport route.

22 *Long-Term Storage.* Impacts would be SMALL. Operation activities are expected to be of
23 relatively short duration and limited in extent. The DTS is a relatively small facility, and the air
24 quality impacts associated with construction would be less than those associated with the
25 original construction of the ISFSI. Replacement of the DTS and ISFSI and maintenance of the
26 rail spur would involve only a fraction of the air emissions associated with initial construction of
27 an ISFSI. Exhaust from vehicles would not be expected to noticeably affect air quality for the
28 region.

29 *Indefinite Storage.* Impacts would be SMALL. Indefinite storage would consist of the same
30 short-duration and limited-extent activities and would result in the same impact magnitudes as
31 described for long-term storage except that they would continue indefinitely into the future.

32 **ES.13.2.5 Climate Change**

33 *Short-Term Storage.* Impacts would be SMALL. Average annual greenhouse gas
34 emissions associated with building and operating an ISFSI as well as transportation

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1 (e.g., commuters, supplies, waste materials, and spent fuel) would be equivalent to the
2 annual emissions from about 1,720 passenger vehicles.

3 *Long-Term Storage.* Impacts would be SMALL. Construction of a DTS, replacement of dry
4 casks and pads, and maintenance activities would likely involve only a fraction of the
5 greenhouse gas emissions associated with the original construction of the ISFSI.

6 *Indefinite Storage.* Impacts would be SMALL. Greenhouse gas emissions would continue to be
7 similar to long-term impacts; they would be a small fraction of the overall level in the
8 United States.

9 **ES.13.2.6 Geology and Soils**

10 *Short-Term Storage.* Impacts would be SMALL. The land required to construct an ISFSI would
11 be relatively small, and soil erosion controls would minimize impacts.

12 *Long-Term Storage.* Impacts would be SMALL. Construction of a DTS would have minimal
13 impacts to geology and soil because of the small size of the facility. Replacement of the ISFSI
14 pads and supporting facilities would likely occur on land near the existing facilities. The old
15 facilities would likely be demolished, and the land would likely be reclaimed.

16 *Indefinite Storage.* Impacts would be similar to long-term storage, SMALL. Replacement of
17 ISFSI and DTS facilities would likely occur on previously disturbed land and would minimize
18 impacts to soils and geology.

19 **ES.13.2.7 Surface-Water Quality and Use**

20 *Short-Term Storage.* Impacts would be SMALL. Best management practices would be
21 implemented during construction of an ISFSI to address stormwater flows, soil erosion, and
22 siltation. Stormwater control measures would be required to comply with State-enforced water-
23 quality permits. Construction and operation of an ISFSI would require very little consumptive
24 use of water.

25 *Long-Term Storage.* Impacts would be SMALL. Given the relatively smaller size of a DTS as
26 compared to an ISFSI, much less water would be required to build a DTS. Consumptive use
27 and surface-water quality impacts would be no greater than those identified for initial
28 construction of the storage facilities.

29 *Indefinite Storage.* Impacts would be SMALL. Impacts would be similar to those for long-term
30 storage. Replacement of ISFSIs and DTS facilities once every 100 years would result in
31 temporary and minimal impacts to surface-water quality and use.

1 **ES.13.2.8 Groundwater Quality and Use**

2 *Short-Term Storage.* Impacts would be SMALL. Methods necessary to control impacts to
3 groundwater quality during construction and operation of an ISFSI are well understood and
4 State-issued permits typically require the implementation of such controls. Construction and
5 operation of an ISFSI would require very little consumptive use of water.

6 *Long-Term Storage.* Impacts would be SMALL. Impacts on groundwater from a DTS would be
7 no larger than those considered for construction of the ISFSI. Likewise, the impacts of replacing
8 portions of the ISFSI over time would be no more than the impacts of the initial construction of
9 the facility, and would likely occur over a longer period of time.

10 *Indefinite Storage.* Impacts would be SMALL. Impacts would be similar to those for long-term
11 storage. Once every 100 years, groundwater may be required when demolishing and replacing
12 the ISFSI and DTS facilities. Consumptive use of groundwater and water-quality impacts would
13 be minor and temporary.

14 **ES.13.2.9 Terrestrial Resources**

15 *Short-Term Storage.* Impacts would be SMALL to MODERATE. Land area permanently
16 disturbed for construction of an away-from-reactor dry cask storage facility would be relatively
17 small, and any impacts to wetlands would be addressed under the Clean Water Act. However,
18 construction could have some noticeable impacts to terrestrial resources, such as habitat loss,
19 displacement of wildlife, and incremental habitat fragmentation. ISFSI operations would have
20 minimal impacts on terrestrial resources.

21 *Long-Term Storage.* Impacts would be SMALL. Impacts from construction of a DTS would be
22 significantly less than those impacts expected from construction and operation of an ISFSI.
23 Because of its relatively small construction footprint, the DTS could be sited on previously
24 disturbed ground and away from sensitive terrestrial resources. Impacts from operational
25 activities would be minor. Replacement activities would occur once about every 100 years, and
26 would likely occur adjacent to existing facilities.

27 *Indefinite Storage.* Impacts would be SMALL. Replacement activities are not expected to add
28 additional impacts beyond those impacts expected for initial construction of the away-from-
29 reactor ISFSI and DTS. Operation of away-from reactor ISFSIs would not require any additional
30 land use beyond that set aside for original construction of the facility.

31 **ES.13.2.10 Aquatic Ecology**

32 *Short-Term Storage.* Impacts would be SMALL. Construction and operation of an away-from-
33 reactor ISFSI would require limited water supplies, and effluents, if any, would be limited to

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1 stormwater and treated wastewater. Impacts to aquatic resources would tend to be limited by
2 certain factors, including the land area permanently disturbed would be relatively small; water
3 use for the construction and operation of the site would be limited; and any impacts from
4 discharges to water bodies would need to be addressed under the Clean Water Act, which
5 requires licensees to obtain a National Pollutant Discharge Elimination System permit for any
6 discharges to water bodies.

7 *Long-Term Storage.* Impacts would be SMALL. Building a DTS, and transferring, handling, and
8 aging management at an away-from-reactor ISFSI could result in ground-disturbing activities
9 that would have impacts similar to or less than impacts associated with the original construction
10 of the ISFSI. Replacement activities would likely occur adjacent to existing facilities, and
11 aquatic disturbances would result in relatively short-term impacts and aquatic environs would
12 recover naturally.

13 *Indefinite Storage.* Impacts would be SMALL. Activities associated with demolishing old
14 facilities and building replacement facilities once about every 100 years could result in minimal,
15 short-term impacts to aquatic resources. Impacts associated with ISFSI operation and
16 maintenance would also be small.

17 **ES.13.2.11 Special Status Species and Habitat**

18 *Short-Term Storage.* Impacts from the initial construction and ongoing operation and
19 maintenance of dry cask storage facilities to special status species and habitat would range
20 from minimal to noticeable, which would be similar to those described for terrestrial and aquatic
21 resources, with any noticeable impacts resulting from the construction of the ISFSI. An away-
22 from-reactor ISFSI could be sited to avoid adversely affecting special status species and
23 habitat. Assuming the ISFSI can be sited to avoid special status species and habitat, operating
24 the ISFSI is not likely to adversely affect special status species and habitat. Impacts would be
25 determined as part of an ESA Section 7 consultation if continued storage would affect Federally
26 listed species or critical habitat. The NRC assumes that consultations would result in avoidance
27 or mitigation measures that would minimize impacts to protected species and habitat.

28 *Long-Term Storage.* During the long-term storage timeframe, replacement of the casks, pads,
29 and the DTS would result in impacts that would be less than initial construction impacts because
30 replacement activities would occur within the facility's operation area near existing facilities.
31 Assuming the ISFSI was sited to avoid special status species and habitat, operating and
32 replacing components of the ISFSI would not likely adversely affect special status species and
33 habitat.

34 *Indefinite Storage.* Impacts to special status species and habitat from continued operation of
35 away-from-reactor ISFSIs if a repository never becomes available would be similar to those

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1 described for the long-term storage timeframe. The same operations and maintenance
2 activities would occur repeatedly because the spent fuel remains at the facility indefinitely.

3 **ES.13.2.12 Historic and Cultural Resources**

4 *Short-Term Storage.* Impacts would be SMALL,
5 MODERATE, or LARGE. Impacts to historic and cultural
6 resources would vary depending on what resources are
7 present, but would be minimized because (1) the land
8 area disturbed would be relatively small, (2) site
9 selection and placement of facilities on the site could be
10 readily adjusted to minimize impacts to historic and
11 cultural resources because the facility does not depend on significant water supply and has
12 limited electrical power needs, and (3) potential adverse effects could also be minimized
13 through development of agreements, license conditions, and implementation of the licensee's
14 historic and cultural resource management plans and procedures to protect known historic and
15 cultural resources and address inadvertent discoveries during construction.

Section 106 of the National Historic Preservation Act of 1966 requires Federal agencies to take into account the effects of their undertakings on historic properties.

16 *Long-Term Storage.* Impacts would be SMALL, MODERATE, or LARGE. Impacts from
17 continued operations, routine maintenance, replacement of the facilities at an away-from-reactor
18 ISFSI, and potential construction, operation, and replacement of a DTS would vary depending
19 on what resources are present, proposed land disturbance, and if the licensee has management
20 plans and procedures that are protective of historic and cultural resources. Additionally, the
21 construction of a DTS and replacement of an ISFSI and the DTS would be Federal actions that
22 would require the NRC to conduct a site-specific assessment of potential impacts to historical
23 and cultural resources under Section 106 of NHPA.

24 *Indefinite Storage.* Impacts would be SMALL, MODERATE, or LARGE. Impacts would be
25 similar to those described for the long-term storage timeframe. Ground-disturbing activities
26 would likely occur in areas that have previously experienced construction impacts.

27 **ES.13.2.13 Noise**

28 *Short-Term Storage.* Impacts would be SMALL. Noise impacts for an away-from-reactor ISFSI
29 could exceed EPA-recommended levels during some portions of construction and operation;
30 however, noise impacts would be short in duration and intermittent.

31 *Long-Term Storage.* Impacts would be SMALL. Noise impacts from continued operation and
32 routine maintenance of an away-from-reactor ISFSI would be minimal. Impacts from
33 construction of a DTS and replacement of the DTS and ISFSI would be similar to those for initial
34 construction of an ISFSI. These construction and replacement activities would be intermittent
35 and short in duration, and noticeable noise levels would be limited to the nearest receptors.

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1 *Indefinite Storage.* Impacts would be SMALL. Impacts would be similar to those associated
2 with the long-term storage timeframe. Ongoing operation, maintenance, and replacement
3 activities would have minimal noise impacts.

4 **ES.13.2.14 Aesthetics**

5 *Short-Term Storage.* Impacts would be SMALL to MODERATE. Potential impacts to aesthetic
6 resources would include visibility of facility buildings, dry storage pads and canisters, and the
7 rail line and trains from across scenic water bodies, roadways, or from higher elevations.
8 Lighting of the facility would increase visibility. If constructed in an area with no prior industrial
9 development, the ISFSI probably would be expected to impact the local viewshed, and scenic
10 appeal of the site would be noticeably changed when viewed from various locations. Impacts
11 could be minimal if the ISFSI is built in a previously disturbed area.

12 *Long-Term Storage.* Impacts would be SMALL to MODERATE. Aesthetic impacts from
13 transferring and handling spent fuel and aging management activities at an away-from-reactor
14 ISFSI are anticipated to be similar to the impacts for initial construction and short-term operation
15 of the ISFSI. Periodic construction, demolition, and operation activities required for aging
16 management would not significantly alter the preexisting impacts on aesthetic resources.

17 *Indefinite Storage.* Impacts would be SMALL to MODERATE. The same operations and
18 maintenance activities that are described for the long-term storage timeframe occur repeatedly
19 because the spent fuel remains at the facility indefinitely.

20 **ES.13.2.15 Waste Management**

21 *Short-Term Storage.* Impacts would be SMALL. Construction activities would generate
22 excavation and construction debris, vegetation debris, and backfill. Operation of an away-from-
23 reactor ISFSI would involve limited waste generating activities. Small quantities of LLW may be
24 generated during routine operation and maintenance. Little to no mixed waste generation would
25 be expected. Small quantities of nonradioactive waste would be generated. All wastes would
26 be managed and disposed of according to regulatory requirements.

27 *Long-Term Storage.* Impacts would be SMALL. Routine maintenance would generate minimal
28 quantities of waste. Construction and operation of a DTS and replacement of casks and ISFSI
29 and DTS facilities at an away-from-reactor ISFSI would generate LLW and nonradioactive
30 waste. Although the exact amount of LLW and nonradioactive waste depends on the level of
31 contamination, the quantity of waste generated from the replacement of the storage casks and
32 concrete storage pads is expected to be a fraction of the LLW generated during reactor
33 decommissioning, which was determined to have a SMALL impact in the Decommissioning
34 GEIS.

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1 *Indefinite Storage.* Impacts would be SMALL to MODERATE. LLW, mixed waste, and
2 nonradioactive waste would continue to be generated indefinitely, and there could be noticeable
3 impacts on the local and regional landfill capacity for nonradioactive waste disposal.

4 **ES.13.2.16 Transportation**

5 *Short-Term Storage.* Impacts would be SMALL to MODERATE. The environmental impacts of
6 transportation include impacts to regional traffic from commuting workers, supply shipments,
7 shipments of spent fuel to the ISFSI, and shipments of nonradioactive and radiological waste.
8 Impacts to traffic from workers commuting to and from the
9 away-from-reactor storage site depend on the size of the
10 workforce, the capacity of the local road network, traffic
11 patterns, and the availability of alternative commuting
12 routes to and from the facility. The majority of impacts
13 would be associated with the traffic during the initial
14 construction of the ISFSI. Shipment of spent fuel from
15 nuclear power plants to the ISFSI would be required to
16 comply with NRC and the U.S. Department of
17 Transportation (DOT) regulations. Radiological impacts
18 to the public and workers from spent fuel shipments from
19 a reactor have previously been evaluated by the NRC (in
20 Table S-4 of 10 CFR 51.52) and were found to be small.

Table S-4 in 10 CFR 51.52 summarizes the environmental impacts of transportation of fuel and waste to and from a nuclear power plant. Data supporting the determinations in Table S-4 is contained in the *NRC's Environmental Survey of Transportation of Radioactive Materials to and from Nuclear Power Plants*, WASH-1238, December 1972, and Supp. 1 NUREG-75/038, April 1975.

21 *Long-Term Storage.* Impacts would be SMALL to MODERATE. Construction of a DTS would
22 require a smaller workforce than the initial construction of the ISFSI, so transportation impacts
23 from workers commuting would be less, but may still be noticeable. Shipments of LLW
24 generated by maintenance and replacement activities would be regulated by NRC and DOT
25 requirements and impacts to traffic and to public and worker radiological and nonradiological
26 safety would be minimal.

27 *Indefinite Storage.* Impacts would be SMALL to MODERATE. Annual transportation activities
28 and associated environmental impacts would be similar to that analyzed for the long-term
29 storage timeframe.

30 **ES.13.2.17 Public and Occupational Health**

31 *Short-Term Storage.* Impacts would be SMALL. Nonradiological health impacts from the
32 construction of an away-from-reactor ISFSI include normal hazards associated with construction
33 such as pollutants (e.g., dust), and fatal and nonfatal occupational injuries (e.g., falls and
34 overexertion). Impacts would be minor and similar to an industrial facility of similar size. Public
35 and occupation radiological doses would be maintained significantly below the dose limits
36

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1 established by 10 CFR Part 72 and 10 CFR Part 20. Licensed facilities would also be required
2 by those regulations to maintain an ALARA program, which would likely reduce the doses even
3 further.

4 *Long-Term Storage.* Impacts would be SMALL. Nonradiological health impacts associated with
5 replacement activities would be similar those for the original construction of the facility, although
6 replacement activities would take place over a longer period of time. Public and occupational
7 radiological doses would be maintained significantly below the dose limits established by
8 10 CFR Part 72 and 10 CFR Part 20. In addition, the dry cask storage facility would be required
9 to maintain an ALARA program that would further reduce radiological doses. Operation of the
10 DTS would involve increased doses to works and a very small increase in dose levels at the site
11 boundary; however, the licensee would still be required to comply with regulations limiting dose.

12 *Indefinite Storage.* Impacts would be SMALL. For the indefinite storage timeframe, the types of
13 activities (construction, operation, and decommissioning) and associated health impacts would
14 remain the same as those for the long-term storage timeframe.

15 **ES.13.2.18 Environmental Impacts of Postulated Accidents**

16 Impacts would be SMALL. Consideration of accidents at an away-from-reactor ISFSI for all
17 three storage timeframes are similar to those for at-reactor ISFSIs (described in Chapter 4 of
18 the draft GEIS). The postulated accidents analysis in the draft GEIS is applicable for all three
19 timeframes (short-term, long-term, and indefinite). NRC regulations in 10 CFR Part 72 require
20 that structures, systems, and components important to safety will be designed to withstand the
21 effects of natural phenomena (such as earthquakes, tornadoes, and hurricanes) and human-
22 induced events without loss of capability to perform those safety functions. NRC siting
23 regulations also require applicants to take into consideration, among other things, physical
24 characteristics of sites that are necessary for the safety analysis or that may have an impact on
25 plant design (such as the design basis earthquake). All these factors are considered in
26 determining the acceptability of the site and design criteria of a proposed dry cask storage
27 facility. The draft GEIS analysis considered an accident scenario in which wind-borne missiles
28 damage the concrete overpack of a dry cask. This accident would result in only slightly higher
29 occupational doses and only negligible increases in radiological doses at the boundary of the
30 site. The analysis also considered an accident resulting in a dry cask leaking, and determined
31 that radiological doses would still be below the limits in 10 CFR Part 20 and 10 CFR Part 72.

32 **ES.13.2.19 Potential Acts of Sabotage or Terrorism**

33 The consideration of terrorism at an away-from-reactor ISFSI for all three storage timeframes
34 are similar to those for at-reactor ISFSIs (described in Chapter 4 of the draft GEIS). The
35 probability and consequences of a successful attack on an away-from-reactor ISFSI are low;
36 therefore, the environmental risk is SMALL.

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1 **Table ES-4.** Summary of Environmental Impacts of Away-From-Reactor Spent Fuel Storage

Resource Area	Short-Term Storage	Long-Term Storage	Indefinite Storage
Land Use	SMALL	SMALL	SMALL
Socioeconomics	SMALL (adverse) to LARGE (beneficial)	SMALL (adverse) to LARGE (beneficial)	SMALL (adverse) to LARGE (beneficial)
Environmental Justice	No disproportionately high and adverse impacts	No disproportionately high and adverse impacts	No disproportionately high and adverse impacts
Air Quality	SMALL to MODERATE	SMALL	SMALL
Climate Change	SMALL	SMALL	SMALL
Geology and Soils	SMALL	SMALL	SMALL
Surface-Water Quality and Use	SMALL	SMALL	SMALL
Groundwater Quality and Use	SMALL	SMALL	SMALL
Terrestrial Resources	SMALL to MODERATE	SMALL	SMALL
Aquatic Ecology	SMALL	SMALL	SMALL
Special Status Species and Habitat	Impacts from the construction of the ISFSI would be determined as part of an ESA Section 7 consultation. Assuming the ISFSI can be sited to avoid special status species and habitat, operation and replacement of the ISFSI is not likely to adversely affect special status species and habitat. Impacts would be determined as part of an ESA Section 7 consultation if continued storage would affect listed species or critical habitat.		
Historic and Cultural Resources	SMALL, MODERATE, or LARGE	SMALL, MODERATE, or LARGE	SMALL, MODERATE, or LARGE
Noise	SMALL	SMALL	SMALL
Aesthetics	SMALL to MODERATE	SMALL to MODERATE	SMALL to MODERATE
Waste Management			
Low-Level Waste	SMALL	SMALL	SMALL
Mixed Waste	SMALL	SMALL	SMALL
Nonradioactive Waste	SMALL	SMALL	SMALL to MODERATE
Transportation			
Traffic	SMALL to MODERATE	SMALL to MODERATE	SMALL to MODERATE
Health	SMALL	SMALL	SMALL
Public and Occupational Health	SMALL	SMALL	SMALL
Accidents	SMALL	SMALL	SMALL
Sabotage or Terrorism	SMALL	SMALL	SMALL

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1 **ES.14 Did the NRC Look at Cumulative Effects?**

2 In Chapter 6 of the draft GEIS, the NRC examined the
 3 incremental impact of continued storage on each
 4 resource area in combination with other past, present,
 5 and reasonably foreseeable actions. The introductory
 6 sections of Chapter 6 discuss the NRC's methodology
 7 for assessing cumulative effects, including the spatial
 8 and temporal bounds on which the NRC based its analyses, and provide a table that describes
 9 national, regional, and local trends that informed the NRC's consideration of reasonably
 10 foreseeable future actions. Trends that the NRC examined include increased energy demand,
 11 continued use of radiological materials, increased water demand, population growth and
 12 demographic shifts, increased urbanization, transportation, and other activities and
 13 environmental stressors. The temporal boundary for the cumulative effects analysis includes
 14 activities that could occur through decommissioning of at-reactor or away-from-reactor storage
 15 facilities.

Cumulative impacts result when the effects of an action are added to or interact with other effects in a particular place and within a particular time.

16 Table ES-5 provides a summary of the determinations made in Chapter 6. The second and
 17 third columns list resource impact determinations made in Chapters 4 and 5. These impacts are
 18 combined with the past, present, and reasonably foreseeable actions discussed in Chapter 6.
 19 The last column lists the cumulative impacts to resource areas. Discussions about impact
 20 differences resulting from cumulative effects can be found in Chapter 6 of the draft GEIS.

21 **Table ES-5.** Summary of Cumulative Effects for Continued Storage of Spent Fuel

Resource Area	Incremental Impact from Onsite Storage	Incremental Impact from Offsite Storage	Cumulative Impact from Continued Storage and Other Federal and Non-Federal Activities
Land Use	SMALL	SMALL	SMALL to MODERATE
Socioeconomics	SMALL	SMALL	SMALL to LARGE
Environmental Justice		No disproportionately high and adverse impacts	
Air Quality	SMALL	SMALL to MODERATE	SMALL to MODERATE
Climate Change	SMALL	SMALL	MODERATE
Geology and Soils	SMALL	SMALL	SMALL to MODERATE
Surface-Water Quality and Use	SMALL	SMALL to MODERATE	SMALL to LARGE
Groundwater Quality and Use	SMALL	SMALL	SMALL to LARGE
Terrestrial Resources	SMALL	SMALL to MODERATE	SMALL to MODERATE
Aquatic Ecology	SMALL	SMALL	SMALL to LARGE

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1 **Table ES-5.** Summary of Cumulative Effects for Continued Storage of Spent Fuel (cont'd)

Resource Area	Incremental Impact from Onsite Storage	Incremental Impact from Offsite Storage	Cumulative Impact from Continued Storage and Other Federal and Non-Federal Activities
Historic and Cultural Resources	SMALL, MODERATE, or LARGE	SMALL, MODERATE, or LARGE	SMALL, MODERATE, or LARGE
Noise	SMALL	SMALL	SMALL to MODERATE
Aesthetics	SMALL	SMALL to MODERATE	SMALL to MODERATE
Waste Management	SMALL to MODERATE	SMALL to MODERATE	SMALL to LARGE
Transportation	SMALL	SMALL to MODERATE	SMALL to MODERATE
Public and Occupational Health	SMALL	SMALL	SMALL
Accidents	SMALL	SMALL	SMALL

2 **ES.15 Does the Draft GEIS Address Costs?**

3 Chapter 7 of the draft GEIS analyzes and compares the benefits and costs associated with the
4 proposed action (preparing a GEIS and revising 10 CFR 51.23), other action alternatives (the
5 GEIS-only and policy statement alternatives), and the no-action alternative. The alternatives do
6 not noticeably alter the environmental impacts from continued storage that the NRC addresses
7 in Chapters 4, 5, and 6 of the draft GEIS. Instead, the alternatives considered provide different
8 approaches that the NRC could apply to future licensing activities that can satisfy the agency's
9 responsibility to consider the potential environmental impacts of continued storage in deciding
10 whether to issue certain new and renewed licenses. Section 7.1 of the draft GEIS includes
11 assumptions about financial costs and current and future licensing reviews that are the bases
12 for the cost and benefit analysis.

13 Section 7.6 of the draft GEIS summarizes and compares the estimated costs of the alternatives,
14 including the savings or expense of each action alternative when compared to the no-action
15 alternative. The cost for the proposed action (preparing a GEIS and revising 10 CFR 51.23) is
16 significantly lower than the cost for any of the alternatives. This occurs primarily because the
17 NRC does not undertake site-specific reviews of the continued storage issue in the course of
18 individual licensing proceedings as part of the proposed action. In general, the no-action
19 alternative is substantially more costly than the proposed action, but less costly than either the
20 GEIS-only or policy statement alternatives. While the no-action alternative avoids the costs
21 associated with a GEIS and rulemaking, site-specific review costs are significantly higher than
22 the avoided costs of the GEIS and rulemaking. The GEIS-only and policy-statement

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1 alternatives avoid the need for rulemaking, but result in higher costs than the no-action
2 alternative because of the up-front costs of creating the GEIS and, for the policy-statement
3 alternative, the policy statement.

4 **ES.16 How did the NRC Address Spent Fuel Pool Fires and** 5 **Leaks?**

6 The NRC assessed the environmental impacts of spent fuel pool fires and leaks as part of the
7 analysis in the GEIS. Further, in response to the historic interest of the public in this issue, as
8 evidenced by comments in NRC's Waste Confidence rulemaking and related litigation, the NRC
9 prepared separate appendices to provide additional, more detailed discussion of the analyses
10 supporting the impact determinations for spent fuel pool fires and leaks. Appendix E of the draft
11 GEIS describes the environmental impacts of spent fuel pool leaks during the short-term
12 storage timeframe, and Appendix F describes the environmental impacts of a spent fuel pool fire
13 during the short-term storage timeframe. In the draft GEIS, the NRC assumes that all spent fuel
14 being stored in spent fuel pools will be transferred to dry casks by the end of the 60-year (short-
15 term) storage timeframe.

16 **ES.16.1 Spent Fuel Pool Leaks**

17 A variety of factors work together to make the likelihood of a spent fuel pool leak that leads to
18 noticeable offsite environmental impacts during continued storage very low, including the
19 combination of spent fuel pool design and maintenance, operational and regulatory practices
20 (e.g., leakage monitoring, NRC oversight, and, more recently, groundwater monitoring), site
21 hydrogeologic characteristics, and radionuclide transport properties.

22 For impacts to groundwater resources, though highly unlikely, it is possible that a leak of
23 sufficient quantity and duration could occur, resulting in noticeable impacts to groundwater
24 resources. The factors that could lead to a significant leak are many and varied. These factors
25 include the magnitude and duration of the leak, the radiological constituents of the leak, the
26 hydrologic conditions of the site, and the distance to the offsite groundwater resource. All these
27 factors, in addition to the assessment of past leaks and the promulgation of regulations requiring
28 monitoring and reporting of subsurface contamination, leads NRC to conclude that the
29 environmental impacts of a spent fuel pool leak during continued storage would be SMALL.

30 Public health concerns would be related to groundwater contamination and would be limited to
31 private wells nearest the site. In the event of uncontrolled and undetected discharges
32 associated with long-term spent fuel pool leaks to nearby surface waters, the annual discharge
33 would be comparable to normal discharges associated with operating reactors, and would likely
34 remain below limits in 10 CFR Part 50, Appendix I. If, in the very unlikely event that a pool leak
35 remained undetected for a long period of time, public health regulatory limits (i.e., EPA drinking

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1 water standards) could potentially be exceeded. ~~In that~~
2 ~~circumstance, the public health impacts could be~~
3 ~~MODERATE.~~ However, it is unlikely that a leak of
4 sufficient quantity and duration could occur without
5 detection, or that such a leak would not be impeded by
6 the inherent hydrologic characteristics typical at spent
7 fuel pool locations. Therefore, based on the low
8 probability that a long-duration leak exceeding effluent
9 limits would go undetected and affect offsite groundwater
10 sources to the extent that a public health limit would be
11 exceeded, the NRC concludes that impacts during the
12 short-term storage timeframe would be SMALL.

13 For all other resource areas evaluated, the impacts from
14 a spent fuel pool leak would be SMALL.

15 ES.16.2 Spent Fuel Pool Fires

16 The spent fuel pool fire environmental impacts described
17 in Appendix F are a summary of spent fuel pool fire risk
18 studies the NRC has completed since 1975. While most
19 of the earlier studies were concerned with spent fuel pool
20 fire risk during the operating life of a reactor, the most
21 recent risk study completed in 2001 examined the risk of
22 spent fuel pool fires during the reactor decommissioning
23 period, which is the same storage timeframe of continued
24 storage of spent fuel on which this draft GEIS is focused.

25 The conservative estimates used to assess the impacts of
26 spent fuel pool fires in NRC's previous analyses resulted
27 in frequency-weighted population doses and economic
28 impacts that were much less than the values calculated for a full power reactor accident
29 estimated in the 1996 and 2013 License Renewal GEIS for the assumptions found in previous
30 analyses (e.g., spent fuel pool density, site population density, and time after shutdown for the
31 event to occur). Furthermore, mitigation measures implemented by licensees as a result of
32 NRC Orders have further lowered the risk of this class of accident. As a result, the NRC finds
33 that the 1996 and 2013 License Renewal GEIS conclusion that the probability-weighted
34 consequences of atmospheric releases, fallout onto open bodies of water, releases to
35 groundwater, and societal and economic impacts of spent fuel pool fires are SMALL is
36 applicable for a spent fuel pool fire during the continued storage timeframe.

Tritium is a radioactive isotope of hydrogen. Water containing tritium is normally released from nuclear power plants under controlled, monitored conditions that the NRC mandates to protect public health and safety. The NRC evaluates abnormal releases of tritium-contaminated water. More information about tritium from nuclear power plants can be found at <http://www.nrc.gov/reading-rm/doc-collections/fact-sheets/tritium-radiation-fs.html>.

The NRC's determination of SMALL for the environmental impacts of a spent fuel fire is based on a **probability-weighted consequence**. This means that the risk of a spent fuel fire informed the impact determination of SMALL.

The risk of a spent fuel fire is low because even though the consequences would be high, the probability is extremely low.

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1 **ES.17 What is the Overall Conclusion of the Waste** 2 **Confidence Draft GEIS?**

3 Chapter 8 of the draft GEIS provides a summary of the environmental impacts and
4 consequences of continued at-reactor and away-from-reactor spent fuel storage, a discussion
5 and cost-benefit analysis of the proposed action, other action alternatives, and the no-action
6 alternative, and a preliminary recommendation to the Commission regarding the preferred
7 alternative.

8 For at-reactor storage, the unavoidable adverse environmental impacts for each resource
9 area are SMALL, with the exception of waste-management impacts, which are SMALL to
10 MODERATE, and historic and cultural impacts, which are SMALL, MODERATE, or LARGE.
11 The moderate waste-management impacts are associated with the volume of nonhazardous
12 solid waste generated by assumed facility-replacement activities for only the indefinite
13 timeframe. The SMALL, MODERATE, or LARGE historic and cultural impacts are based on a
14 combination of the additional land-disturbing activities from DTS-construction and facility-
15 replacement activities during the long-term and indefinite storage timeframes and a range of
16 site-specific characteristics that are assumed for the purpose of evaluating a reasonable range
17 of potential impacts.

18 For away-from-reactor storage, the unavoidable adverse environmental impacts for each
19 resource area are SMALL except for air quality, terrestrial ecology, aesthetics, waste
20 management, and transportation for which the impacts would be SMALL to MODERATE.
21 Socioeconomics impacts would range from SMALL to **beneficial and** LARGE and historic and
22 cultural impacts could be SMALL, MODERATE, or LARGE. The potential MODERATE impacts
23 to air quality, terrestrial wildlife, and transportation are based on construction-related potential
24 fugitive dust emissions, terrestrial wildlife direct and indirect mortalities, and temporary
25 construction traffic impacts. The potential MODERATE impacts to aesthetics and waste
26 management are based on noticeable changes to the viewshed from constructing a new ISFSI,
27 and the volume of nonhazardous solid waste generated by assumed ISFSI and DTS
28 replacement activities for only the indefinite timeframe. Potential LARGE impacts to
29 socioeconomics would be due to local economic tax revenue increases from an away-from-
30 reactor ISFSI. The potential LARGE impacts to historic and cultural and special status species
31 apply to assumed site-specific circumstances at an away-from-reactor ISFSI involving the
32 presence of these resources during construction activities and absence of effective protection
33 measures. Specifically, these potential historic and cultural impacts vary depending on whether
34 resources are present, the extent of proposed land disturbance, and if the licensee has
35 management plans and procedures that are protective of historic and cultural resources.

36 For both at-reactor and away-from-reactor ISFSIs, there would be no irreversible and
37 irretrievable commitments of resources during continued storage for most resources. However,

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1 impacts on land use, aesthetics, historic and cultural resources, waste management, and
2 transportation would result in irreversible and irretrievable commitments. As finite resources,
3 the loss of historic and cultural resources would constitute irreversible and irretrievable impacts.
4 For the indefinite storage timeframe, land and visual resources allocated for spent fuel storage
5 would be committed in perpetuity as continued operations would preempt other productive land
6 uses and permanently affect the viewshed. Waste-management activities involving waste
7 treatment, storage, and disposal would result in irreversible commitment of capacity for waste
8 disposal. Transportation activities would involve irreversible and irretrievable commitment of
9 resources, including vehicle fuel for commuting workers and shipping activities.

10 Of the alternatives considered, the proposed action (i.e., preparing a GEIS and revising
11 10 CFR 51.23) is the most efficient regulatory approach for addressing the impacts of continued
12 storage, and provides for the same level of environmental protection as the other alternatives.
13 The NRC quantitative analysis of costs shows that the cost for the proposed action is
14 significantly lower than the cost for any of the alternatives. This occurs primarily because the
15 NRC does not undertake site-specific reviews of continued storage in the course of individual
16 licensing proceedings as part of the proposed action.

17

In conclusion, the NRC recommendation is to select the proposed action—revising 10 CFR 51.23—as the preferred alternative. The NRC recommendation is based on (1) NRC independent impact assessments of continued storage summarized in the draft GEIS, which would result in substantially the same impact conclusions for any of the evaluated alternatives; (2) NRC consideration of public scoping comments in the development of the draft GEIS; and (3) NRC analysis of the cost-benefit balance of the proposed action and alternatives. In making its preliminary recommendation, the NRC determined that none of the alternatives assessed were obviously superior to the proposed action.

18

19 **ES.18 How is the Draft GEIS Related to the Waste** 20 **Confidence Rule?**

21 This draft GEIS, if adopted, would provide a regulatory basis for the NRC's proposed
22 amendment to 10 CFR 51.23. Appendix B of the draft GEIS contains detailed information about
23 the previous Waste Confidence rule, and addresses two relevant topics from earlier versions of
24 the Waste Confidence decisions: the technical feasibility for continued storage and repository
25 availability. NRC's conclusions regarding these topics, based on the best available information,
26 continue to undergird the agency's environmental analysis.

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1 **ES.19 Are There Any Areas of Controversy in the Draft** 2 **GEIS?**

3 There are a number of areas of controversy that should be considered in preparing comments
4 on the draft GEIS.

- 5 1. The NRC has included detailed analyses of spent fuel pool leaks and spent fuel pool fires.
6 Historically, the NRC has devoted considerable attention to these topics, and there has
7 been intense public interest in these issues, as evidenced by comments received during the
8 scoping period and during the litigation on the 2010 Waste Confidence update. The NRC
9 therefore prepared separate appendices to provide additional detail regarding the studies
10 and analyses that underlie the analyses of spent fuel pool fires and leaks.
- 11 2. The NRC has included indefinite storage as one of the three timeframes analyzed in this
12 draft GEIS. The NRC has devoted considerable attention to this timeframe in response to
13 the intense public interest in this issue, as evidenced by comments received during the
14 scoping period and during the litigation on the 2010 Waste Confidence update. Although
15 the NRC believes it is likely that a repository will be available by 60 years after the end of a
16 reactor's licensed life for operation, it does recognize that the availability of a repository is a
17 controversial issue and has included an analysis of indefinite storage in the draft GEIS.
- 18 3. The NRC will update this list to reflect areas of controversy that are identified by public
19 comments on this draft GEIS.

20 **ES.20 Are There Any Remaining Issues to be Resolved?**

21 For the purposes of successfully completing the draft GEIS while meeting NEPA requirements,
22 the NRC believes there are numerous sources of the requisite technical data and information
23 available; therefore, there are no remaining issues that require resolution. In the reference
24 section of each chapter, the NRC has listed technical documents and reports on pertinent
25 issues that are used to support the analyses in the draft GEIS. Additionally, the NRC will adopt
26 or incorporate by reference all or part of existing EISs, as appropriate. The NRC will rely on
27 accurate and high quality information to ensure the Waste Confidence GEIS contains a
28 thorough and rigorous environmental impact analysis. As new information becomes available,
29 the NRC will gauge the significance of the new information, and will review its conclusions as
30 necessary.

1 **ES.21 What are the Next Steps in the NRC's Waste** 2 **Confidence Rulemaking?**

3 The NRC is seeking comments on both the draft GEIS and proposed Waste Confidence rule.
4 A 75-day public comment period from ~~August X~~September 13, 2013, through November ~~X26~~,
5 2013, will be scheduled to receive comments on the draft GEIS and the proposed Rule. During
6 that time, the NRC plans to conduct two nationally webcast meetings and eight regional public
7 meetings. There will be no need to submit separate comments on the draft GEIS and the
8 proposed Rule, as comments on the two documents will be treated the same. The 75-day
9 comment period from ~~August X~~September 13, 2013, through November ~~X26~~, 2013, will be the
10 same for both the draft GEIS and proposed Rule.

11 Following closure of the comment period, the NRC will evaluate, summarize, and respond to the
12 comments received. The NRC will revise the draft GEIS and proposed Rule in response to
13 comments, as necessary, and, if appropriate, will issue a final GEIS and Rule. Comments on
14 the draft GEIS and proposed Rule will be summarized and responded to in a separate
15 document that will be issued with and referenced in the final GEIS and *Federal Register* Notice
16 for the final rule.

17 **ES.22 How Can I Obtain a Copy of and Comment on the** 18 **Draft GEIS and Proposed Rule?**

19 Ways of viewing or obtaining a copy of the draft GEIS are described below:

- 20 • View an electronic copy of the draft GEIS at [http://www.nrc.gov/waste/spent-fuel-](http://www.nrc.gov/waste/spent-fuel-storage/wcd.html)
21 [storage/wcd.htmlwww.nrc.gov](http://www.nrc.gov)
- 22 • View an electronic copy of the draft GEIS at www.regulations.gov using
23 Docket ID No. NRC-2012-0246
- 24 • Request a free CD or hard copy of the draft GEIS by submitting a request to
25 WCO Outreach@nrc.gov, or by calling ~~4-301-492-3425~~287-0675

26 There are many ways to submit comments on the draft GEIS and proposed Rule. You can
27 participate in one of the nationally webcast meetings, which will also be accessible by
28 telephone, or one of the regional public meetings, where you can state your comments and
29 obtain additional information related to the draft GEIS and proposed Rule. Comments received
30 during the public meetings will be transcribed and added to the record. Information on how to
31 participate in the webcast meetings, and the dates, times, and locations of the regional
32 meetings can be found at <http://www.nrc.gov/public-involve/public-meetings/index.cfm>.

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1 The NRC gives all comments equal weight, no matter who submits them or how they are
2 submitted. If you cannot participate in one of our nationally webcast meetings or regional public
3 meetings, you can submit written comments through any of the methods below.

4 **Submit comments online** at www.regulations.gov using Docket ID No. NRC–2012–0246

5 **E-mail comments to** Rulemaking.Comments@nrc.gov, citing Docket ID No. NRC–2012–0246

6 **Mail comments to** Secretary
7 U.S. Nuclear Regulatory Commission
8 Washington, DC 20555-0001
9 ATTN: Rulemakings and Adjudications Staff

10 **Fax comments to** Secretary
11 U.S. Nuclear Regulatory Commission
12 301-415-1101, citing Docket ID No. NRC–2012–0246

13 **Hand-deliver comments to** 11555 Rockville Pike, Rockville, Maryland 20852, between
14 7:30 a.m. and 4:15 p.m. (Eastern Time) on Federal workdays; telephone ~~1~~-301-415-1677.

15 **ES.23 When Can I Comment?**

16 You can comment via mail, fax, www.regulations.gov, and e-mail any time from **August**
17 **~~X~~September 13, 2013** through **November ~~X~~26⁷, 2013**.

18

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Abbreviations/Acronyms

ACHP	Advisory Council on Historic Preservation
ADAMS	Agencywide Documents Access and Management System
AEC	U.S. Atomic Energy Commission
ALARA	as low as is reasonably achievable
ANS	American Nuclear Society
ANSI	American National Standards Institute
ASLBP	Atomic Safety and Licensing Board Panel
ASME	American Society of Mechanical Engineers
BMP	best management practice
BWR	boiling water reactor
CEDE	committed effective dose equivalent
CEQ	Council on Environmental Quality
CFR	<i>Code of Federal Regulations</i>
CNWRA	Center for Nuclear Waste Regulatory Analyses
CO ₂	carbon dioxide
COL	combined license
dBA	decibel(s) (acoustic)
D.C.	District of Columbia
DOE	U.S. Department of Energy
DOT	U.S. Department of Transportation
DTS	dry transfer system
EA	Environmental Assessment
EIS	environmental impact statement
EFH	essential fish habitat
EMF	electromagnetic field
EPA	U.S. Environmental Protection Agency
EPRI	Electric Power Research Institute
ESA	Endangered Species Act of 1973, as amended
ESP	early site permit
FEIS	final environmental impact statement
FONSI	finding of no significant impact
FR	<i>Federal Register</i>
FSAR	Final Safety Analysis Report

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Abbreviations/Acronyms

FTE	full-time equivalent
FWS	U.S. Fish and Wildlife Service
GCRP	U.S. Global Change Research Program
GEH	General Electric-Hitachi
GEIS	Generic Environmental Impact Statement
GHG	greenhouse gases
HLW	high-level waste
HSM	horizontal storage modules
IAEA	International Atomic Energy Agency
INL	Idaho National Laboratory
iPWR	integral pressurized water reactor
ISFSI	independent spent fuel storage installation
LLW	low-level waste
LWR	light water reactor
MCL	maximum contaminant level
MEI	maximally exposed individual
MOX	mixed oxide
MTU	metric tons of uranium
NA	not applicable
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act of 1969, as amended
NHPA	National Historic Preservation Act of 1966, as amended
NMFS	National Marine Fisheries Services
NMSS	Office of Nuclear Material Safety and Safeguards
NPDES	National Pollutant Discharge Elimination System
NRC	U.S. Nuclear Regulatory Commission
NRDC	Natural Resources Defense Council
NRHP	National Register of Historic Places
OMB	Office of Management and Budget
OSHA	Occupational Safety and Health Administration
PFS	Private Fuel Storage, LLC
PFSF	Private Fuel Storage Facility
PM	particulate matter
PM _{2.5}	particulate matter with a diameter of 2.5 microns or less

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Abbreviations/Acronyms

PM ₁₀	particulate matter with a diameter of 10 microns or less
PWR	pressurized water reactors
RCRA	Resource Conservation and Recovery Act of 1976, as amended
REMP	radiological environmental monitoring program
TEDE	total effective dose equivalent
TMI-2	Three Mile Island Unit 2
TN	Transnuclear Inc.
TVA	Tennessee Valley Authority
USACE	U.S. Army Corps of Engineers
USC	United States Code
USCB	U.S. Census Bureau

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Units of Measure

1	<u>Metric Prefixes</u>		34	<u>Length/Distance</u>	
2	tera (T-)	10 ¹²	35	cm	centimeter(s)
3	giga (G-)	10 ⁹	36	ft	foot or feet
4	mega (M-)	10 ⁶	37	in.	inch(es)
5	kilo (k-)	10 ³	38	km	kilometer(s)
6	hecto (h-)	10 ²	39	m	meter(s)
7	deci (d-)	10 ⁻¹	40	mi	mile(s)
8	centi (c-)	10 ⁻²	41	mm	millimeter(s)
9	milli (m-)	10 ⁻³	42	yd	yard(s)
10	mirco (μ-)	10 ⁻⁶	43		
11	nano (n-)	10 ⁻⁹	44	<u>Volume</u>	
12	pico (p-)	10 ⁻¹²	45	m ³	cubic meter(s)
13			46	yd ³	cubic yard(s)
14	<u>Radiological Units</u>		47	ft ³	cubic foot(feet)
15	μCi/ml	microcurie(s) per milliliter	48	L	liter(s)
16	Bq	becquerel(s)	49	gal	gallon(s)
17	Ci	curie(s)	50	gpd	gallon(s) per day
18	Ci/L	curies per liter	51	gpm	gallon(s) per minute
19	Ci/yr	curie(s) per year	52	oz	ounce(s)
20	mrem	millirem	53		
21	mSv	millisievert(s)	54	<u>Area</u>	
22	pCi	picocurie(s)	55	ha	hectare(s)
23	pCi/L	picocurie(s) per liter	56	ac	acre(s)
24	R	roentgen	57	ft ²	square foot(feet)
25	rad	special unit of absorbed	58	mi ²	square mile(s)
26		dose	59	m ²	square meter(s)
27	rem	roentgen equivalent man	60		
28		(a special unit of radiation	61	<u>Units of Time</u>	
29		dose)	62	hr	hour(s)
30	S	siemens	63	mo	month
31	Sv	sievert	64	s	second(s)
32			65	yr	year(s)
33			66	min	minute
			67	Ryr	reactor year(s)
			68		
			69		

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Units of Measure

1	<u>Units of Temperature</u>		13	<u>Units of Weight</u>	
2	°C	degree(s) Celsius	14	MT	metric ton(s) (or tonne[s])
3	°F	degree(s) Fahrenheit	15	MTU	metric ton(s) of uranium
4			16	T	ton(s)
5	<u>Units of Concentration</u>		17		
6	ppm	parts per million	18	<u>Units of Power</u>	
7	ppt	parts per thousand	19	Btu	British thermal unit(s)
8			20	GWd	gigawatt-day(s)
9	<u>Units of Speed</u>		21	MW	megawatt(s)
10	mph	mile(s) per hour	22	MW(e)	megawatt(s) electrical
11			23	Ci/L	curies per liter
12			24	L/d	liter(s) per day
			25	L/min	liter(s) per minute
			26	ml or mL	milliliter(s)
27					

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1.0 Introduction

Since the inception of commercial nuclear power, the ~~U.S. Nuclear Regulatory Commission (NRC) (including its predecessor, the Atomic Energy Commission)~~ United States has worked to find a disposal solution for spent nuclear fuel (spent fuel) generated by commercial nuclear power reactors. In the late 1970s, the ~~U.S. Nuclear Regulatory Commission (NRC)~~ reexamined an underlying assumption used in licensing reactors to that time—that a repository could be secured for the ultimate disposal of spent fuel generated by nuclear reactors, and that spent fuel could be safely stored in the interim. This analysis was called the Waste Confidence proceeding.

This draft *Waste Confidence Generic Environmental Impact Statement* (draft GEIS) addresses the environmental impacts of continuing to store spent fuel at a reactor site or at an away-from-reactor storage facility, after the end of a reactor's licensed life for operation until final disposition in a geologic repository ("continued storage"). This draft GEIS has been prepared to fulfill the Commission's obligations under the National Environmental Policy Act of 1969, as amended (NEPA) and NRC regulations implementing NEPA in Title 10 of the *Code of Federal Regulations* (CFR) Part 51.

1.1 History of Waste Confidence

The first Waste Confidence rulemaking began in the late 1970s in response to two significant legal proceedings. In 1977, the Commission denied a petition for rulemaking filed by the Natural Resources Defense Council (NRDC) that asked the NRC to determine whether radioactive wastes generated in nuclear power reactors can be disposed of without undue risk to public health and safety and to refrain from granting pending or future requests for reactor operating licenses until the NRC made a determination regarding disposal. The Commission stated in its denial that, as a matter of policy, it "... would not continue to license reactors if it did not have reasonable confidence that the wastes can and will in due course be disposed of safely" (42 FR 34391). The Commission's denial of the NRDC petition was affirmed upon judicial review (*NRDC v. NRC*). Since that time, the Federal government has adopted deep geologic disposal as the national solution for spent fuel disposal (Nuclear Waste Policy Act of 1982). Recently, the U.S. Department of Energy (DOE) reaffirmed the Federal government's commitment to the ultimate disposal of spent fuel, and predicted that a repository would be available by 2048 (DOE 2013).

At about the same time the Commission denied the NRDC petition, the State of Minnesota and the New England Coalition on Nuclear Pollution challenged license amendments that permitted

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Introduction

1 expansion of the capacity of spent fuel storage pools at two nuclear power plants, Vermont
2 Yankee and Prairie Island. In 1979, the Court of Appeals for the District of Columbia (D.C.)
3 Circuit, in *Minnesota v. NRC*, remanded to the Commission the question of whether an offsite
4 storage or disposal solution would be available for the spent fuel at the two facilities at the
5 expiration of their licenses—at that time scheduled for 2007 and 2009—and, if not, whether
6 the spent fuel could be stored safely at those reactor sites until an offsite solution was available.

7 In 1979, the NRC initiated a generic rulemaking that stemmed from these challenges and the
8 Court's remand in *Minnesota v. NRC*. The Waste Confidence rulemaking generically assessed
9 whether the Commission could have reasonable assurance that spent fuel produced by nuclear
10 power plants "... can be safely disposed of....when such disposal or offsite storage will be
11 available, and....whether radioactive wastes can be safely stored onsite past the expiration of
12 existing facility licenses until offsite disposal or storage is available" (44 FR 61372). On
13 August 31, 1984, the Commission published the Waste Confidence decision (49 FR 34658)
14 (Decision) and a final rule (49 FR 34688), codified at 10 CFR 51.23 (Rule). In addition to
15 addressing the NRC's assessment of the issues presented by the Court's remand, the Decision
16 provided an environmental assessment (EA) and finding of no significant impact (FONSI) to
17 support the Rule.

18 The analysis in 10 CFR 51.23 found that, for at least 30 years beyond the expiration of a
19 reactor's licensed life for operation, no significant environmental impacts would result from
20 storage of spent fuel, and expressed the Commission's reasonable assurance that a repository
21 was likely to be available in the 2007 to 2009 timeframe. The Rule also stated that, as a result
22 of this generic determination, the NRC need not prepare any site-specific environmental
23 analysis in connection with continuing storage when issuing a license or amended license for a
24 new reactor or independent spent fuel storage facility (ISFSI) (10 CFR 51.23(b)).

25 The first review of the Decision and the Rule occurred in 1989 and 1990. This review resulted
26 in revisions to the Decision and the Rule to reflect revised expectations for the availability of the
27 first repository, and to clarify that the expiration of a reactor's licensed life for operation referred
28 to the full 40-year initial license for operation and a 30-year revised or renewed license. On
29 September 18, 1990, the Commission published the revised Decision (55 FR 38474) and final
30 Rule (55 FR 38472).

31 The Commission conducted its second review of the Decision and the Rule in 1999 and
32 concluded that experience and developments after 1990 had confirmed the findings and made a
33 comprehensive reevaluation of the Decision and Rule unnecessary. The Commission also
34 stated that it would consider undertaking a comprehensive reevaluation when the pending
35 repository development and regulatory activities had run their course or if significant and
36 pertinent unexpected events occurred that raised substantial doubt about the continuing validity
37 of the Waste Confidence decision (64 FR 68005).

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1 In 2008, the Commission decided to conduct its third review of the Decision and the Rule. This
2 review resulted in revisions to reflect revised expectations for the availability of the first
3 repository and to encompass at least 60 years of continued storage. In December 2010, the
4 Commission published its revised Decision (75 FR 81032) and final Rule (75 FR 81037).

5 In response to the 2010 rulemaking, the States of New York, New Jersey, Connecticut, and
6 Vermont; several public interest groups; and the Prairie Island Indian Community sought review
7 in the U.S. Court of Appeals for the D.C. Circuit challenging the Commission's NEPA analysis
8 that supported the Rule. On June 8, 2012, the Court ruled that some aspects of the
9 2010 Waste Confidence rulemaking did not satisfy the NRC's NEPA obligations. The Court
10 therefore vacated the Decision and the Rule and remanded the case to the NRC for further
11 proceedings consistent with the Decision (*New York v. NRC*).

12 The Court concluded that the Waste Confidence rulemaking proceeding is a major Federal
13 action necessitating either an environmental impact statement (EIS) or an EA that results in a
14 FONSI. The Court identified three deficiencies in the NRC's environmental analysis:

- 15 1. Related to the Commission's conclusion that permanent disposal will be available "when
16 necessary," the Court held that the Commission needed to evaluate the environmental
17 effects of failing to secure permanent disposal, given the uncertainty about whether a
18 repository would be built.
- 19 2. Related to 60 years of continued storage, the Court concluded that the Commission had not
20 adequately examined the risk of spent fuel pool leaks in a forward-looking fashion.
- 21 3. Also related to continued storage, the Court concluded that the Commission had not
22 adequately examined the consequences of potential spent fuel pool fires.

23 In response to the Court's decision, the Commission stated in Commission Order CLI-12-16
24 that it would not issue reactor or ISFSI licenses dependent upon the Waste Confidence rule
25 until the Court's remand is appropriately addressed (NRC 2012a). This decision is not an
26 indication that the Commission lacks confidence in the availability of an ultimate disposal
27 solution, but rather reflects the Commission's need to develop an analysis that assesses the
28 environmental impacts of continued storage in a manner addressing the Court's remand.¹
29 The Commission stated, however, that this determination extends only to issuance of the
30 **reactor or ISFSI** license, and that all licensing reviews and proceedings should continue to move

¹ "Waste confidence undergirds certain agency licensing decisions, in particular new reactor licensing and reactor license renewal. Because of the recent court ruling striking down our current waste confidence provisions, we are now considering all available options for resolving the waste confidence issue, which could include generic or site-specific NRC actions, or some combination of both. We have not yet determined a course of action. But, in recognition of our duties under the law, we will not issue licenses dependent upon the Waste Confidence Decision or the Temporary Storage Rule until the court's remand is appropriately addressed." (NRC 2012a) at 4 *citations omitted*.

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1 forward. In SRM-COMSECY-12-016, the Commission directed the NRC to develop a GEIS to
2 support an updated Waste Confidence decision and rule (NRC 2012b).

3 **1.2 Scope of the Generic Environmental Impact Statement**

4 This draft GEIS analyzes the environmental impacts of continued storage, and also will provide
5 a regulatory basis for a proposed revision to the NRC's Waste Confidence rule.

6 The Waste Confidence rule, originally adopted by the Commission in 1984, satisfies part of the
7 Commission's NEPA obligation to prepare an environmental analysis prior to licensing a
8 commercial nuclear power reactor or a facility that will store the spent fuel generated by
9 these reactors.

10 For both power reactor and storage facilities, NEPA requires that the NRC address direct,
11 indirect, and cumulative impacts of its licensing actions. Thus, in issuing a power reactor
12 license, the NRC must analyze the environmental impacts resulting from the generation of spent
13 fuel by the reactor and its continued storage pending ultimate disposal. Likewise, for an ISFSI,
14 the NRC must analyze the impacts of continued storage at the facility until ultimate disposal for
15 the spent fuel is available. The environmental impacts addressed in this draft GEIS are limited
16 to the environmental impacts of continued storage.

17 This draft GEIS considers three possible continued storage timeframes: (1) short-term storage
18 of no more than 60 years after the end of a reactor's licensed life for operation; (2) long-term
19 storage of no more than 160 years after the end of a reactor's licensed life for operation; and
20 (3) indefinite storage at a reactor site or at an away-from-reactor ISFSI. The indefinite storage
21 scenario assumes that disposal in a repository never becomes available.

22 As discussed above, the NRC has analyzed three timeframes that represent various scenarios
23 for the length of continued storage that will be needed before spent fuel is sent to a repository.
24 The first, most likely, timeframe is the short-term timeframe, which analyzes 60 years of
25 continued storage after the end of a reactor's licensed life for operation. As discussed in more
26 detail later this draft GEIS and in Appendix B to this draft GEIS, the NRC believes this is the
27 most likely timeframe because the DOE has expressed its intention to provide repository
28 capacity by 2048, which is about 10 years before the end of this timeframe for the oldest spent
29 fuel within the scope of this analysis. Further, international and domestic experience with deep
30 geologic repository programs supports a timeline of 25–35 years to provide repository capacity
31 for the disposal of spent fuel. The DOE's prediction of 2048 is in line with this expectation. The
32 NRC acknowledges, however, that the short-term timeframe, although the most likely, is not
33 certain. Accordingly, this draft GEIS also analyzed two additional timeframes. The long-term
34 timeframe considers the environmental impacts of continued storage for a total of 160 years
35 after the end of a reactor's licensed life for operation. Finally, although the NRC considers it

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1 highly unlikely, this draft GEIS includes an analysis of an indefinite timeframe, which assumes
2 that a repository does not become available.

3 **1.3 Purpose of the Generic Environmental Impact Statement**

4 This draft GEIS assesses the environmental impacts of continued storage and, if adopted,
5 would provide a regulatory basis for the NRC's proposed amendment to 10 CFR 51.23.

6 Consistent with principles of efficient use of agency resources and the Council on
7 Environmental Quality guidance, publication of this draft GEIS will help the Commission
8 decide whether the environmental impacts associated with continued storage can be considered
9 on a generic basis and codified in a rule. If so, then site-specific consideration of continued
10 storage would be unnecessary. As described in the introduction to this chapter, the
11 Commission has already generically considered continued storage and related impacts
12 addressed in 10 CFR 51.23 in various proceedings over the past 40 years. The Commission's
13 operating experience from spent fuel storage and licensing dates back to the 1950s and
14 supports the assessment of continued storage impacts in a draft GEIS for several reasons:

- 15 • Continued storage will involve spent fuel storage facilities for which the environmental
16 impacts of operation are sufficiently well understood as a result of lessons learned and
17 knowledge gained from operating experience.
- 18 • Activities associated with continued storage are expected to be within this well-understood
19 range of operating experience; thus, environmental impacts can be reasonably predicted.
- 20 • Changes in the environment around spent fuel storage facilities are sufficiently gradual and
21 predictable to be addressed using a generic approach.

22 This draft GEIS does not authorize issuance of any NRC license, but rather discloses the
23 environmental impacts associated with the continued storage of spent fuel. In addition, this
24 draft GEIS considers alternative approaches to assessing the environmental impacts of
25 continued storage (see Section 1.6).

26 **1.4 Proposed Federal Action**

27 The Commission proposes to issue a revised Rule, 10 CFR 51.23, that generically addresses
28 the environmental impacts of continued storage. This revision would adopt into regulation the
29 environmental impact analyses in this draft GEIS. Further, the revision would state that
30 because the impacts of continued storage have been generically assessed in this draft GEIS
31 and codified in a Rule, NEPA analyses for future reactor and spent fuel storage facility licensing
32 actions would not need to separately consider the environmental impacts of continued storage.

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1 **1.5 Purpose of and Need for the Proposed Action**

2 The purpose and need for the proposed action are threefold: (1) to improve the efficiency of the
3 NRC's licensing process by generically addressing the environmental impacts of continued
4 storage; (2) to prepare a single document that reflects the NRC's current understanding of these
5 environmental impacts; and (3) to respond to the issues identified in the remand by the Court in
6 the *New York v. NRC* decision.

7 The NRC intends to codify the results of its analyses in this draft GEIS at 10 CFR 51.23.
8 NRC licensing proceedings for nuclear reactors and ISFSIs will continue to rely on the generic
9 determination in 10 CFR 51.23 to satisfy obligations under NEPA with respect to the
10 environmental impacts of continued storage.

11 **1.6 Alternatives**

12 The NRC could pursue several alternatives, other than the proposed action, to address the
13 environmental impacts of continued storage in its licensing actions.

- 14 • First, the NRC could take no action and address the environmental impacts from continued
15 storage in each of its nuclear power plant and ISFSI initial licensing and license renewal
16 proceedings.
- 17 • Second, the NRC could develop a GEIS without incorporating the results into a rule. This
18 approach would allow the NRC to adopt ~~this~~-these draft GEIS findings into environmental
19 reviews for future licensing activities, but without the binding effect of a rule.
- 20 • Third, the Commission could issue a policy statement. The policy statement would not bind
21 licensees and applicants like a rule, but it would provide notice of the Commission's intent to
22 incorporate the findings of the GEIS into environmental reviews for future licensing activities.

23 **1.6.1 No-Action Alternative**

24 Under the no-action alternative, the NRC would take no action to generically address the
25 environmental impacts of continued storage. The NRC would then perform site-specific reviews
26 of the environmental impacts of continued storage. These reviews would generally take place
27 within the context of existing environmental review processes for new reactor licensing, reactor
28 license renewal, and ISFSI licensing and renewals. In some cases, these reviews could involve
29 time- and resource-intensive considerations of issues that could readily be resolved on a
30 generic basis. Therefore, this alternative is not consistent with Council on Environmental
31 Quality guidance for achieving efficiency and timeliness under NEPA.

32 In the no-action alternative, it is likely that NRC would first construct complete analyses of the
33 issues previously addressed by earlier Waste Confidence proceedings resulting in the adoption

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1 and revision of 10 CFR 51.23 for use in site-specific NEPA reviews, and then incorporate by
2 reference the applicable findings from the first few published environmental documents that
3 used the analyses. This approach could ultimately lead the NRC to consider the issue through
4 a generic and replicable analysis.

5 From a procedural perspective, the main effect of the no-action alternative is that the NRC
6 would have to address, in site-specific reviews, the environmental impacts of continued storage
7 for individual licensing proceedings. Requiring the NRC to prepare site-specific discussions of
8 generic issues, like those associated with continued storage, could result in the considerable
9 expenditure of public, NRC, and applicant resources. Further, licensing boards could be
10 required to hear nearly identical contentions in each proceeding on these generic issues.
11 Preparing and codifying the generic impacts of continued storage allows the NRC and the
12 parties to its licensing proceedings to focus their limited resources on the site-specific issues
13 that are unique to each licensing action.

14 **1.6.2 Other Reasonable Alternatives**

15 In addition to the proposed action and the no-action alternative, this draft GEIS considers two
16 other alternatives: a GEIS-only alternative and a policy-statement alternative.

17 **1.6.2.1 GEIS-Only Alternative**

18 Instead of incorporating the results of this draft GEIS into a binding revision of 10 CFR 51.23,
19 the NRC could develop and issue a GEIS that addresses the generic environmental effects of
20 continued storage, which would then be used to support site-specific licensing reviews. This
21 nonbinding, "GEIS-only" alternative would add somewhat to the efficiency of NRC reviews by
22 addressing issues that are similar at all sites or that otherwise are susceptible to generic
23 consideration. For particular licensing actions, the EIS or EA could incorporate by reference
24 any finding or conclusion of the GEIS, but parties to a proceeding could still file contentions on
25 continued storage. This approach is consistent with Council on Environmental Quality guidance
26 regarding efficiency and timeliness under NEPA.

27 While this approach would be beneficial in terms of improved efficiency, the GEIS's findings and
28 conclusions would remain open to challenge in site-specific reviews for reactor and ISFSI
29 licensing proceedings. Although this incorporation-by-reference approach would satisfy NRC's
30 NEPA obligations, this alternative could enable parties in licensing proceedings to raise
31 contentions that challenge the conclusions of the GEIS. Thus, the "GEIS-only" approach would
32 eliminate some of the efficiency and time-savings that the NRC would gain through a binding
33 generic analysis of continued storage, although it would provide greater efficiencies than the no-
34 action (site-specific) alternative.

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1 Requiring the NRC to prepare multiple site-specific discussions of generic issues, when a
2 generic analysis would suffice, would result in considerable expenditure of public, NRC, and
3 applicant resources. Further, licensing boards might be required to hear nearly identical
4 contentions in individual licensing proceedings. Determining and codifying the generic impacts
5 of continued storage, on the other hand, would allow the NRC and parties to its licensing
6 proceedings to focus their limited resources on the site-specific issues that are unique to each
7 licensing action.

8 **1.6.2.2 Policy-Statement Alternative**

9 Instead of incorporating a GEIS into a binding rule on the impacts of continued storage, the
10 Commission could issue a policy statement that expresses its intent to either incorporate the
11 environmental impacts determined by the GEIS into site-specific NEPA analyses or to prepare
12 a site-specific evaluation without regard to the GEIS for each NRC licensing action.

13 In general, a policy statement suffers from many of the same shortcomings as the no-action and
14 nonbinding GEIS alternatives. The NRC would still need to address the impacts of continued
15 storage in site-specific NEPA analyses either by incorporating the impacts from the GEIS or
16 through the consideration of the impacts on a site-specific basis if no GEIS is adopted. Like the
17 no-action and nonbinding GEIS-only alternatives, the policy-statement alternative would reduce
18 the efficiencies that the NRC would gain through a rule whose incorporation of environmental
19 impacts of continued storage would be binding in licensing proceedings, although it would at
20 least provide notice to parties that the Commission might elect to incorporate by reference all or
21 a portion of the existing GEIS.

22 Preparation of site-specific analyses of continuing storage impacts, either by incorporating a
23 generic analysis by reference or by ignoring earlier analyses altogether, would result in
24 considerable expenditure of public, NRC, and applicant resources. Further, licensing boards
25 could be expected to hear nearly identical contentions in each proceeding on these generic
26 issues. Determining and codifying the generic impacts of continued storage would allow the
27 NRC and parties to its licensing proceedings to focus their limited resources on site-specific
28 issues that are unique to each licensing action.

29 **1.6.3 Alternatives Considered but Eliminated**

30 Interested parties submitted numerous scoping comments suggesting that this draft GEIS
31 should consider other actions as alternatives to the proposed update to 10 CFR 51.23. In
32 this section, this draft GEIS considers and eliminates the most common suggested alternatives
33 because they fail to address the purpose and need for this draft GEIS.

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1 **1.6.3.1 Cessation of Licensing or Cessation of Reactor Operation**

2 Cessation of licensing activities and cessation of reactor operations do not satisfy the stated
3 purpose and need for this draft GEIS, which is to improve the efficiency of NRC's licensing
4 process, to prepare a single source that reflects the NRC's current understanding of the
5 environmental impacts of continued storage, and to comply with the remand in the *New York v.*
6 *NRC* decision. Abandonment of reactor licensing and the closure of existing plants is not a
7 reasonable alternative to the proposed action because these actions would not meet the NRC's
8 stated objectives in proposing to revise 10 CFR 51.23.

9 Through the Atomic Energy Act, Congress has mandated that the NRC establish criteria to
10 allow the licensing of nuclear power plants. Therefore, without Congressional direction to do so,
11 the NRC may not deny a reactor license unless it determines that a license applicant has not
12 met the NRC's regulatory standards for issuance of a license. Further, unless a threat to the
13 public health and safety or the common defense and security exists, the NRC has no authority
14 to deprive current licensees of their vested interest in licenses already issued in compliance with
15 those regulatory standards. In separate rulemaking actions, the Commission has already
16 established criteria that provide reasonable assurance of public health and safety and due
17 consideration of environmental impacts in the construction and operation of nuclear power
18 plants, including facilities for continuing storage of spent fuel.

19 Although cessation of nuclear power plant licensing and operations would halt the future
20 generation of spent fuel, other environmental impacts could result from the required
21 development of replacement power sources or demand reductions. Even then, the
22 environmental impacts of continued storage would not cease until sufficient repository capacity
23 becomes available.

24 **1.6.3.2 Implementing Additional Regulatory Requirements**

25 Imposing new regulatory requirements, such as requiring licensees to implement hardened
26 at-reactor storage systems, reduce the density of spent fuel in pools, or expedite transfer of
27 spent fuel from pools to ISFSIs, is outside the scope of this proposed action, which includes
28 alternatives that improve the efficiency of the NRC's licensing process by generically addressing
29 the environmental impacts of continued storage. Adoption of a revised 10 CFR 51.23,
30 supported by this draft GEIS, is not a licensing action, and does not impose new requirements
31 on licensees or applicants. Therefore, the NRC cannot impose new requirements or regulations
32 on the duration of spent fuel storage in pools through this proposed action. In separate
33 proceedings, the NRC is considering implementing revised security requirements as part of the
34 ongoing ISFSI security rulemaking effort. The rulemaking effort is described in the
35 December 16, 2009, *Federal Register* notice (74 FR 66589), "Draft Technical Basis for
36 Rulemaking Revising Security Requirements for Facilities Storing SNF [spent nuclear fuel] and
37 HLW [high-level waste]; Notice of Availability and Solicitation of Public Comments." Also, the

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1 NRC is separately considering expedited transfer of spent fuel from pools as part of lessons
2 learned from the March 11, 2011 earthquake and subsequent tsunami that badly damaged the
3 Fukushima I Nuclear Power Plant in Japan (NRC 2012c).

4 **1.6.4 Comparison of Reasonable Alternatives**

5 The reasonable alternatives considered here include the proposed action (revising
6 10 CFR 51.23), no action (resulting in site-specific analyses in each licensing proceeding), a
7 generic EIS without a Rule (GEIS-only), and a Commission policy statement (GEIS-only or site-
8 specific analysis in each licensing proceeding).

9 The environmental impacts of these three alternatives are substantially the same, and the
10 licensed activities under all three alternatives remain the same. The alternatives merely
11 propose alternative means of analyzing the environmental impacts of continued storage. In
12 subsequent chapters of this draft GEIS, the NRC considers the potential environmental impacts
13 that result from continued storage. Chapter 7 provides a cost-benefit analysis of the
14 alternatives.

15 **1.7 Public and Agency Involvement**

16 **1.7.1 Scoping Process**

17 The NRC began the environmental review process by publishing a Notice of Intent to prepare
18 an EIS and conduct scoping in the *Federal Register* on October 25, 2012 (77 FR 65137). The
19 NRC conducted live and webcast public meetings on November 14, 2012 (NRC 2012d), and
20 conducted public webinars on December 5 and 6, 2012 (NRC 2012e). The NRC transcribed
21 the discussions that took place during the scoping meetings and webinars. The NRC received
22 approximately 700 pieces of comment correspondence, primarily through the website at
23 www.Regulations.gov (using Docket ID NRC–2012–0246) and, to a lesser extent, by fax and
24 mail. The scoping period formally closed on January 2, 2013, although staff considered
25 comments received after this date to the extent practical.

26 Scoping participants included private citizens and representatives of Tribes and State
27 governments, the U.S. Environmental Protection Agency (EPA), multiple environmental and
28 advocacy groups, industry, and quasi-governmental organizations. In all, the NRC identified
29 approximately 1,700 comments from the materials submitted.

30 The NRC responded to comments in its “Waste Confidence Generic Environmental Impact
31 Statement Scoping Process Summary Report” (NRC 2013a), which was published on March 4,
32 2013. The summary report, in accordance with 10 CFR 51.29(b), contained a summary of
33 conclusions reached by the NRC and issues identified as a result of the scoping process.

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1 Additional information regarding the summary report is provided in Appendix A. A summary of
2 outreach and correspondence related to the environmental review is provided in Appendix C.

3 Both this draft GEIS and the proposed Rule will have a concurrent 75-day public comment
4 period. The comment period will begin on the date of publication of EPA's Notice of Availability
5 of this draft GEIS in the *Federal Register* and will allow interested parties to comment on the
6 results of the environmental review and the proposed Waste Confidence rule. During this
7 period, the NRC will conduct public meetings to describe the results of the environmental
8 review, respond to questions, and accept public comments on this draft GEIS and proposed
9 rule. Comments received on this draft GEIS and the proposed Rule will be addressed in the
10 final GEIS and the Rule.

11 **1.7.2 Cooperating Agencies**

12 The NRC did not identify any cooperating agencies for the Waste Confidence environmental
13 review, nor did the NRC receive any formal requests for cooperating agency status.

14 **1.8 Analytical Approach**

15 The NRC's methodology and approach to evaluating the environmental impacts of continued
16 storage follows the guidance in NUREG-1748, "Environmental Review Guidance for Licensing
17 Actions Associated with NMSS Programs: Final Report" (NRC 2003), where applicable.

18 This draft GEIS evaluates the potential environmental impacts of continued storage at reactor
19 sites in Chapter 4, and at away-from-reactor sites in Chapter 5. The environmental impacts are
20 evaluated for three timeframes based on when a repository would become available. This
21 section outlines the approach, timeframes, assumptions, and previous NEPA assessments the
22 NRC used in its evaluation.

23 **1.8.1 Approach to Impact Assessment**

24 To evaluate the potential environmental impacts of continued storage at reactor sites
25 (Chapter 4), the NRC assumes that spent fuel is stored in a pool and in an ISFSI, both of which
26 have already been constructed and are operating during reactor operations. Therefore, many of
27 the impacts of at-reactor continued spent fuel storage can be determined by comparing onsite
28 activities that occur during reactor operations to the reduced activities that occur during
29 continued storage. Where appropriate, the environmental impacts during reactor operations are
30 drawn from the License Renewal GEIS (NRC 2013b), which evaluates the impacts of continued
31 reactor operation. In addition, this draft GEIS uses analyses in EAs prepared for ISFSIs and
32 renewals of those ISFSI licenses.

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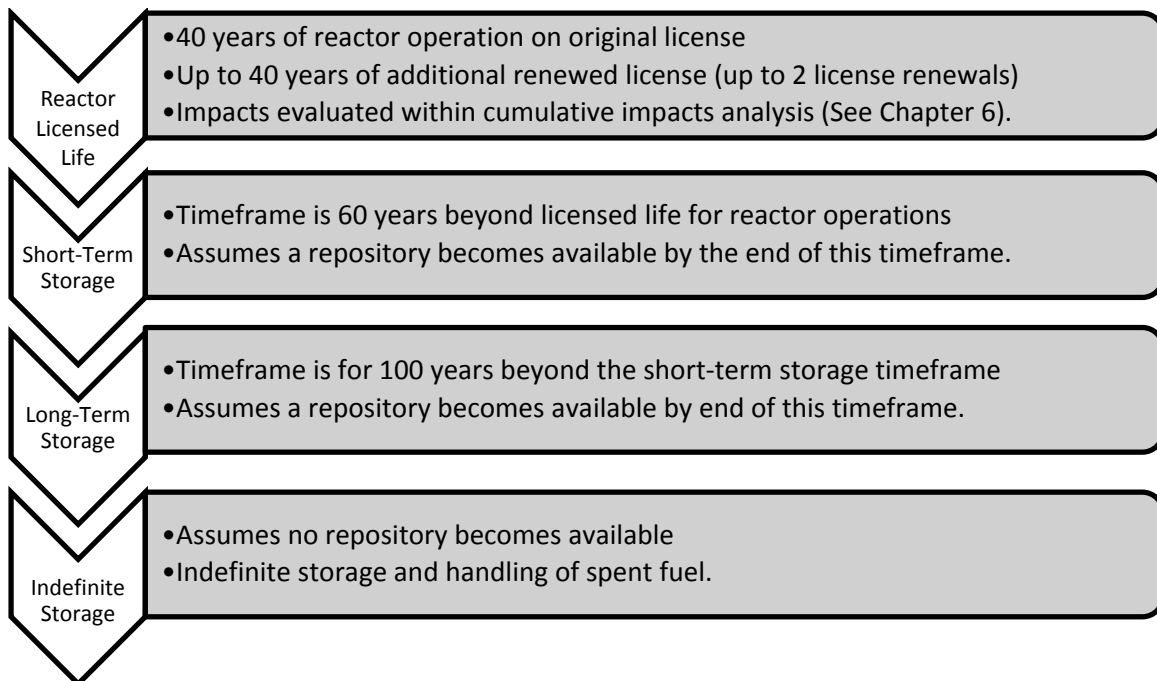
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1 For the impacts of continued storage at an-away-from-reactor ISFSI, the NRC evaluated the
2 impacts of an ISFSI of the same size as described in the “Final Environmental Impact Statement
3 for the Construction and Operation of an Independent Spent Nuclear Fuel Storage Installation
4 on the Reservation of the Skull Valley Band of Goshute Indians and Related Transportation
5 Facility in Tooele County, Utah” (NRC 2001). Chapter 5 contains a list of the assumptions used
6 in that analysis. Unlike in Chapter 4, the generic analysis for away-from-reactor storage at an
7 ISFSI includes a general discussion of the construction of the facility. However, the site-specific
8 impacts of the construction and operation of any proposed ISFSI would be evaluated by NRC as
9 part of that ISFSI’s licensing process.

10 For both the at-reactor and away-from-reactor storage sites, the NRC assumes that the
11 construction, operation, and replacement of a dry transfer system (DTS) facility is necessary at
12 some point to handle the transfer of fuel. Chapter 2 provides the physical characteristics of the
13 reference DTS (see Section 2.1.4).

14 1.8.2 Timeframes Evaluated

15 The NRC evaluated the environmental impacts of continued storage in three timeframes that
16 begin once the licensed life of the reactor ends—short-term storage, long-term storage, and
17 indefinite storage (see Figure 1-1).



18
19

Figure 1-1. Continued Storage Timeframes

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1 The first timeframe—*short-term storage*—lasts for 60 years and begins after the end of the
2 licensed life for a nuclear power plant. The NRC evaluated the environmental impacts resulting
3 from the following activities that occur during the short-term storage timeframe:

- 4 • continued storage of spent fuel in spent fuel pools (at-reactor only) and ISFSIs
- 5 • routine maintenance of at-reactor spent fuel pools and ISFSIs (e.g., maintenance of
6 concrete pads)
- 7 • construction and operation of an away-from-reactor ISFSI (including routine maintenance)
- 8 • handling and transfer of spent fuel from spent fuel pools to ISFSIs

9 The next timeframe—*long-term storage*—is 100 years and begins immediately after the short-
10 term storage timeframe. The NRC evaluated the environmental impacts resulting from the
11 following activities that occur during long-term storage:

- 12 • continued storage of spent fuel in ISFSIs, including routine maintenance
- 13 • one-time replacement of ISFSIs and spent fuel canisters and casks
- 14 • construction and operation of a DTS (including replacement)

15 For the long-term storage timeframe, the NRC assumes that all spent fuel has already been
16 moved from the spent fuel pool to dry cask storage by the end of the short-term storage
17 timeframe. The spent fuel pool would be decommissioned within 60 years of permanent
18 cessation of operation, as required by 10 CFR 50.82.

19 The third timeframe—*indefinite storage*—assumes that a geologic repository does not become
20 available. In this timeframe, at-reactor ~~spent fuel storage would continue to be stored onsite in~~
21 ~~spent fuel pools until the end of the short-term storage timeframe and in at-reactor and away-~~
22 ~~from-reactor ISFSIs indefinitely and away-from-reactor ISFSIs would continue to store spent fuel~~
23 ~~in dry casks indefinitely.~~ For the evaluation of environmental impacts if no repository becomes
24 available, the following activities are considered:

- 25 • continued storage of spent fuel in ISFSIs, including routine maintenance
- 26 • replacement of ISFSIs and spent fuel canisters and casks every 100 years
- 27 • construction and operation of an away-from-reactor ISFSI (including replacement every
28 100 years)
- 29 • construction and operation of a DTS (including replacement every 100 years)

30 These activities are the same as those that would occur for long-term storage, but without a
31 repository, they would occur repeatedly.

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1 1.8.3 Analysis Assumptions

2 To evaluate the potential environmental impacts of continued storage, this draft GEIS makes
3 several assumptions.

- 4 • Although the NRC recognizes that the precise time spent fuel is stored in pools and dry cask
5 storage systems will vary from one reactor to another, this draft GEIS makes a number of
6 reasonable assumptions regarding the length of time the fuel can be stored in a spent fuel
7 pool and in a dry cask before the fuel needs to be moved or the facility needs to be
8 replaced. With respect to spent fuel pool storage, the NRC assumes that all spent fuel is
9 removed from the spent fuel pool and placed in dry cask storage in an ISFSI no later than
10 60 years after the end of the reactor's licensed life for operation. With respect to dry cask
11 storage, the NRC assumes that the licensee uses a DTS during long-term and indefinite
12 storage timeframes to move the spent fuel to a new dry cask every 100 years. Similarly, the
13 NRC assumes that the DTS and the ISFSI pad are replaced every 100 years. For an ISFSI
14 that reaches 100 years of age near the end of the short-term storage timeframe, the NRC
15 assumes that the replacement would occur during the long-term storage timeframe.
- 16 • Based on its knowledge of and experience with the structure and operation of the various
17 facilities that will provide continued storage, including the normal life of those facilities,
18 the NRC believes that spent fuel pool storage could last for about 60 years beyond the
19 licensed life for operation of the reactor where it is stored, and that each ISFSI will last about
20 100 years, for a total of 160 years or less of likely continued storage if a repository becomes
21 available.
- 22 • Institutional controls, i.e., the continued regulation of spent nuclear fuel, will continue. This
23 assumption avoids unreasonable speculation regarding what might happen in the future
24 regarding Federal actions to provide for the safe storage of spent fuel. Although
25 government agencies² and regulatory safety approaches can be expected to change over

² Institutional controls are relied upon by Federal agencies that regulate hazards to public health and property that persist into the future. For example, the Environmental Protection Agency (EPA) relies on institutional controls to ensure that future land use at decontaminated sites is consistent with the type and level of cleanup at a site, and the Federal Emergency Management Agency and the U.S. Army Corps of Engineers use institutional controls to restrict development in floodplains (ELI 1995). Institutional controls associated with Federal programs typically include enforcement tools to address potential problems involving improper or incomplete implementation, maintenance, and breaches of institutional controls. Examples of institutional controls include permits, Federal Facility Agreements, and environmental covenants that apply continuously with present and future ownership of the subject property (under either state statute or common law) (EPA 2012). Some Federal agencies acknowledge that it may be necessary to have permanent institutional controls (USACE 2000). In addition, EPA recognizes that “[f]or some response actions, institutional controls may be selected as a permanent measure to prevent unacceptable exposures to contamination that remains in place” (EPA 2012). The Department of Energy (DOE), at their Savannah River Site facility, asserts that the entire site will remain under federal government ownership within its current boundaries in perpetuity (DOE 2000).

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- 1 long periods of time into the future, the history of radiation protection has generally been
2 towards ensuring increased safety as knowledge of radiation and effectiveness of safety
3 measures has improved. For the purpose of the analyses in this draft GEIS, the NRC
4 assumes that regulatory control of radiation safety will remain at the same level of regulatory
5 control as currently exists today.
- 6 ~~• Institutional controls will continue. This assumption avoids unreasonable speculation
7 regarding what might happen in the future regarding Federal actions to provide for the safe
8 storage of spent fuel. Although government agencies and regulatory safety approaches can
9 be expected to change over long periods of time into the future, the history of radiation
10 protection has generally been towards ensuring increased safety as knowledge of radiation
11 and effectiveness of safety measures has improved. For the purpose of the analyses in this
12 draft GEIS, the NRC assumes that regulatory control of radiation safety will remain at the
13 same level of regulatory control as currently exists today.~~
- 14 • The DOE analyzed a no-action alternative in their Final EIS for Yucca Mountain (DOE 2008)
15 that considered the loss of institutional controls. In particular, the DOE considered a specific
16 scenario in which spent fuel and high-level radioactive waste would remain in dry storage
17 at commercial and DOE sites and would be under institutional controls for approximately
18 100 years, and beyond that time, it was assumed there would be no institutional controls.

When reviewing site remedies at Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) sites, EPA does not consider loss of institutional controls. Rather, as required by section 121(c) of CERCLA and consistent with 40 CFR 300.430(f)(4)(ii), EPA conducts five-year reviews of the IC components of the implemented remedy (EPA 2011). For disposal sites where waste is buried in place or disposed in the subsurface, DOE does consider loss of institutional controls in their Environmental Impact Statements (EISs). For example, in their post-closure EIS analysis for the Savannah River Site F- and H-Tank Farms, DOE assessed the potential impacts if institutional controls were lost after 100 years and residents move into or intruders entered the tank farm areas (DOE 2002). However, DOE's post closure analysis of the F- and H-Tank Farms needed to demonstrate that the tank closure meets applicable disposal performance requirements, which is unrelated to the indefinite storage of licensed spent nuclear fuel considered in this draft Generic EIS. DOE also took a similar approach in their EIS analysis for the Waste Isolation Pilot Plant site where it was assumed that the earliest time that penetration of the buried material could occur was 100 years after repository closure (i.e., the end of the active institutional control period) (DOE 1997). DOE's approach to the loss of institutional controls at a dry cask storage facility was provided in its Yucca Mountain EIS (DOE 2008). In its analysis, DOE found that the loss of institutional controls resulted in catastrophic impacts for several resource areas. These approaches to institutional controls were related to post-closure buried radioactive waste and are not relevant to the indefinite dry cask storage of licensed spent nuclear fuel considered in Waste Confidence. A dry cask spent nuclear fuel storage facility is not sited, designed, or built to avoid active maintenance like a low-level waste disposal facility. Further, at some period beyond the closure of the disposal facility, there is a potential that the knowledge of the intended purpose of the facility could be lost, thereby increasing the likelihood that an inadvertent intrusion could occur. In contrast, a dry storage facility is typically a visible surface structure requiring active maintenance and security, making loss of institutional control so unlikely that it is a remote and speculative occurrence. Given that the National Environmental Policy Act does not require consideration of remote and speculative issues, this analysis has not been included in this GEIS.

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- 1 The NRC provided comments to the DOE related to their assumption about the loss of
2 institutional controls (NRC 2000). The NRC stated that it did not consider the loss of
3 institutional controls a reasonable assumption because the Federal government would
4 continue to control licensed material under its authority for as long as necessary to protect
5 the public health and safety.
- 6 • A DTS will be built at each ISFSI location during long-term storage timeframe to facilitate
7 spent fuel transfer and handling.
 - 8 • The NRC assumes a 100-year replacement cycle for spent fuel canisters and casks. This
9 assumption is consistent with assumptions made in the Yucca Mountain Final EIS (DOE
10 2008).
 - 11 • The 100-year replacement cycle also assumes replacement of the ISFSI facility and DTS.
 - 12 • Based on currently available information, the 100-year replacement cycle provides a
13 reasonably conservative assumption for a storage facility that would require replacement at
14 a future point in time. However, this assumption does not mean that dry cask storage
15 systems and facilities *need* to be replaced every 100 years to maintain safe storage.
 - 16 • The NRC assumes that the land used for the ISFSI pads and DTS would be reclaimed after
17 the facilities are demolished and, therefore, could be used again in the next 100-year
18 replacement cycle. The NRC believes this assumption is reasonable because the
19 characteristics of the previously disturbed land ~~is-are~~ already known and ~~is-are~~ suitable for
20 ISFSI and DTS design and construction.
 - 21 • The NRC assumes that aging management, including routine maintenance activities and
22 programs occurs between replacements. These “routine” or planned maintenance activities
23 are distinct from the “replacement” of facilities and equipment.
 - 24 • The spent fuel is moved from the spent fuel pool to dry cask storage within the short-term
25 storage timeframe.
 - 26 • ~~The~~ Under NRC regulations, a nuclear power plant that operates for the term specified in its
27 license is required to complete decommissioning within 60 years after the licensed life for
28 operations in accordance with 10 CFR 50.82 or 52.110. Under these regulations, a plant
29 that terminates its license early is required to complete decommissioning within 60 years
30 after the permanent cessation of operation. Consistent with this requirement, the NRC
31 assumes that by the end of the short-term storage timeframe, a licensee will either terminate
32 its Part 50 or 52 license and receive a specific Part 72 ISFSI license (see 10 CFR Part 72,
33 Subpart C) or apply to receive Commission approval under 10 CFR 50.82(a)(3) or 52.110(c)
34 to continue decommissioning under its Part 50 or 52 license. Accordingly, the NRC would
35 conduct any appropriate site-specific NEPA analysis for either issuance of a Part 72 ISFSI
36 license upon termination of the licensee’s Part 50 or 52 license or approval to continue
37 decommissioning beyond 60 years after ceasing operations in accordance with 10 CFR
38 50.82(a)(3) or 52.110(c). Further, the NRC assumes that replacing an ISFSI and licensing a

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- 1 DTS are licensing actions that would be subject to separate site-specific NEPA reviews.
2 The ISFSI and DTS would be decommissioned separately. ~~NRC assumes that nuclear power~~
3 ~~plant decommissioning occurs within 60 years after the licensed life for operations in~~
4 ~~accordance with 10 CFR 50.82 or 52.110. The NRC also assumes that, by the end of the~~
5 ~~short-term storage timeframe, a licensee will either terminate its Part 50 or 52 license and~~
6 ~~receive a specific Part 72 ISFSI license (see 10 CFR Part 72, Subpart C) or receive~~
7 ~~Commission approval under 10 CFR 50.82(a)(3) or 52.110(c) to continue decommissioning~~
8 ~~under its Part 50 or 52 license. In either case, the NRC assumes that the NRC will conduct~~
9 ~~an appropriate site-specific NEPA analysis for either issuance of a Part 72 ISFSI license or~~
10 ~~approval to continue decommissioning in accordance with 10 CFR 50.82(a)(3) or 52.110(c).~~
11 ~~The ISFSI and DTS would be decommissioned separately.~~
- 12 • Replacement of the entire ISFSI would occur over the course of each 100-year interval,
13 starting at the beginning of the long-term storage timeframe.
 - 14 • Construction, operation, and replacement of the DTS are assumed to occur within the long-
15 term storage timeframe. If the DTS is built at the beginning of the long-term storage
16 timeframe, it could be near the end of its useful life by the end of that storage timeframe. To
17 be conservative, the NRC included the impacts of replacing the DTS one time during the
18 long-term storage timeframe.
 - 19 • Because an away-from-reactor ISFSI could store fuel from several different reactors, the
20 earliest an away-from-reactor ISFSI would enter the short-term timeframe is when the first of
21 these reactors reaches the end of its licensed life for operation.
 - 22 • The amount of spent fuel generated is based on the assumption that the nuclear power
23 plant operates for 80 years (40-year initial term plus two 20-year renewed terms).³
 - 24 • A typical spent fuel pool of 700 metric tons of uranium (MTU) storage capacity reaches its
25 licensed capacity limit about 30 years into the licensed life for operation of a reactor. At
26 that point, some of the spent fuel would need to be removed from the spent fuel pool and
27 transferred to a dry cask storage system at either an at-reactor or away-from-reactor ISFSI.
 - 28 • The environmental impacts of constructing a “spent fuel pool island,” which allows the spent
29 fuel pool to be isolated from other reactor plant systems to facilitate decommissioning, are
30 considered within the analysis of cumulative effects in Chapter 6. Because a new spent fuel
31 pool cooling system would be smaller in size and have fewer associated impacts than
32 existing spent fuel pool cooling systems, the environmental impacts of operating the new
33 spent fuel pool cooling system in support of continued storage in the spent fuel pool, would
34 be bound by the impacts of operating the existing cooling system described in Chapter 4.

³ The Commission's regulations provide that renewed operating licenses may be subsequently renewed, although no licensee has yet submitted an application for such a subsequent renewal. ~~has not determined as a matter of policy that a second renewal is a possibility.~~ This draft GEIS included two renewals as a conservative assumption in evaluating potential environmental impacts.

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- 1 • It is assumed that an ISFSI of sufficient size to hold all spent fuel generated **will be**
2 **constructed** during **the** licensed life for operation ~~will be constructed~~.
- 3 • Sufficient low-level waste (LLW) disposal capacity will be made available when needed.
4 Historically, the demand for LLW disposal capacity has been met by private industry. NRC
5 expects that this trend will continue in the future. For example, in response to demand for
6 LLW disposal capacity, Waste Control Specialists, LLC, opened a LLW disposal facility in
7 Andrews County, Texas on April 27, 2012.

8 The analyses in this draft GEIS are based on current technology and regulations. Appendix B
9 provides further information supporting the analysis assumptions. These analyses are not
10 intended to be, and should not be interpreted as, representative of any specific storage facility
11 or site in the United States where spent fuel is currently stored or could be stored in the future.

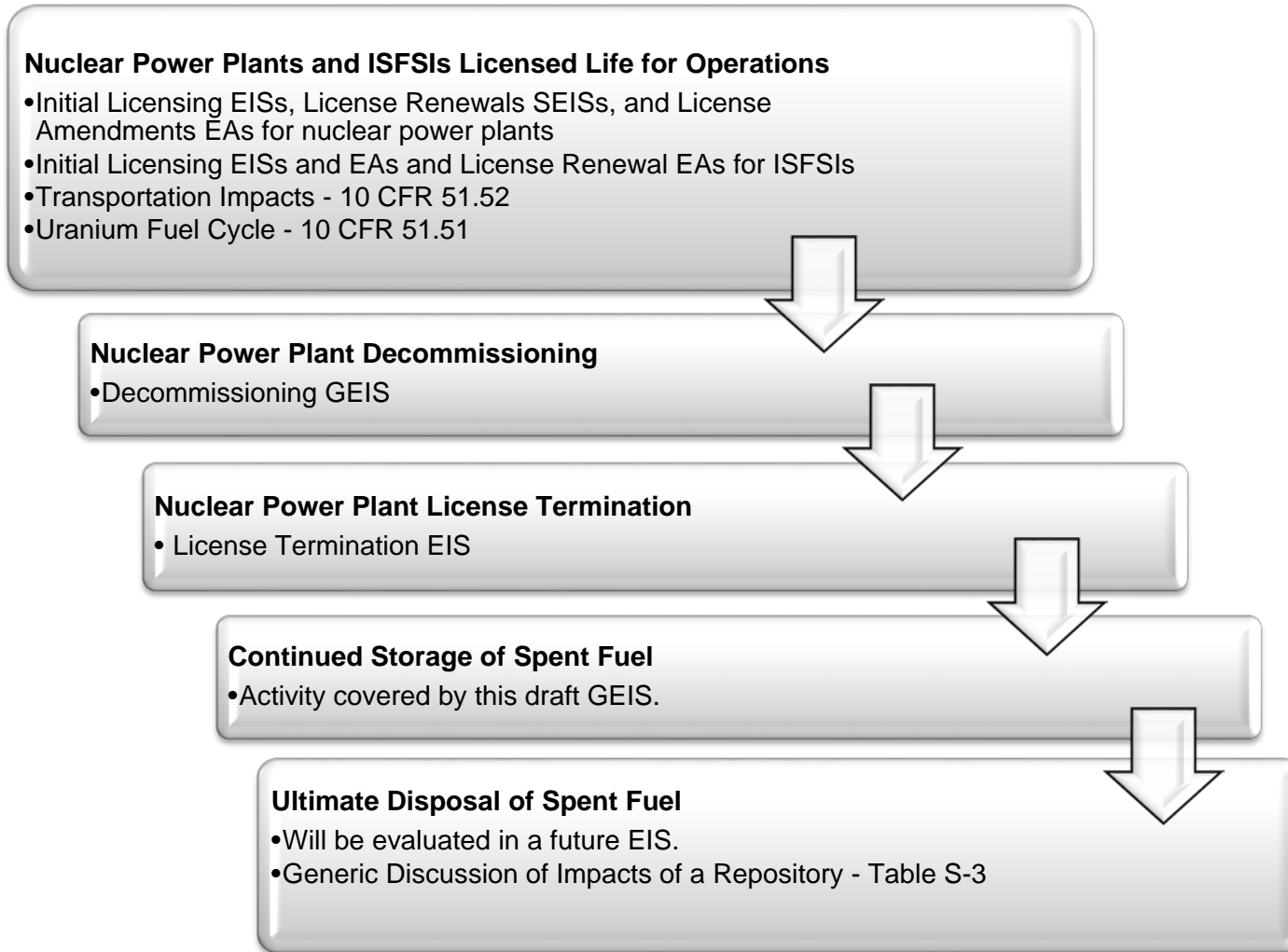
12 **1.8.4 Other Environmental Analyses**

13 Numerous NRC proceedings, regulations, or NEPA documents address the environmental
14 impacts of other NRC-regulated activities: the licensed life for operation of a commercial
15 nuclear power facility, the licensed life of an ISFSI, spent fuel transportation, the nuclear fuel
16 cycle, license termination, and ultimate spent fuel disposal. This is depicted in Figure 1-2. A
17 brief description of these other NEPA documents and regulations are presented below. Some
18 of the NEPA documents used to support the analyses in this draft GEIS are listed in Table 1-1.

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Figure 1-2. NEPA Analyses for Other NRC Activities

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1 **Table 1-1.** List of NEPA Documents Used in Preparation of this Draft GEIS

Document	Agency	Date	Availability
Final EIS for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada and its supplements	DOE	June 2008	Online at www.energy.gov ML081750212 ^(a)
Generic EISs			
Final Generic EIS on Decommissioning of Nuclear Facilities Supplement 1 Regarding the Decommissioning of Nuclear Power Reactors	NRC	November 2002	NUREG-0586 ^(b) ML023470323
Spent Fuel Transportation Risk Assessment	NRC	May 2012	NUREG-2125 ^(b) ML12125A218
Final Generic EIS on Handling and Storage of Spent Light Water Power Reactor Fuel	NRC	August 1979	NUREG-0575 ^(b) ML022550127
ISFSI Licensing			
EA for 10 CFR Part 72 Licensing Requirements for the Independent Storage of Spent Fuel and High-Level Radioactive Waste	NRC	August 1984	NUREG-1092 ^(b) ML091050510
Final EIS for the Construction and Operation of an Independent Spent Nuclear Fuel Storage Installation on the Reservation of the Skull Valley Band of Goshute Indians and Related Transportation Facility in Tooele County, Utah	NRC	December 2001	NUREG-1714 ^(b) ML020150217
Environmental Assessment Related to the Construction and Operation of the H.B. Robinson Independent Spent Fuel Storage Installation	NRC	March 1986	ML060200531 ^(a)
Environmental Assessment for the Trojan Independent Spent Fuel Storage Installation	NRC	November 1996	ML060410416 ^(a)
Environmental Assessment for the License Renewal of the General Electric Morris Operation Independent Spent Fuel Storage Installation in Morris, Illinois	NRC	November 2004	ML043360415 ^(a)

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Table 1-1. List of NEPA Documents Used in Preparation of this Draft GEIS (cont'd)

Document	Agency	Date	Availability
Final Environmental Impact Statement for the Construction and Operation of an Independent Spent Fuel Storage Installation to Store the Three Mile Island Unit 2 Spent Fuel at the Idaho National Engineering and Environmental Laboratory	NRC	March 1998	NUREG-1626 ^(b) ML123480202
Environmental Assessment Related to the Construction and Operation of the Oconee Nuclear Station Independent Spent Fuel Storage Installation - Redacted	NRC	October 1988	ML123480209 ^(a) (Redacted)
Environmental Assessment Related to the Construction and Operation of the Calvert Cliffs Independent Spent Fuel Storage Installation – Redacted	NRC	March 1991	ML123480177 ^(a) (Redacted)
Environmental Assessment for Proposed Renewal of Calvert Cliffs Nuclear Power Plant Independent Spent Fuel Storage Installation	NRC	April 2012	ML121220084 ^(a)
Environmental Assessment Related to the Construction and Operation of the Fort St. Vrain Independent Spent Fuel Storage Installation	NRC	February 1991	ML123480181 ^(a) (Redacted)
Environmental Assessment Related to the Construction and Operation of the Humboldt Bay Independent Spent Fuel Storage Installation	NRC	October 2005	ML052430106
Notice of Issuance of Environmental Assessment and Finding of No Significant Impact for the Diablo Canyon Independent Spent Fuel Storage Installation	NRC	October 2003	ML032970369
Environmental Assessment Related to the Construction and Operation of the Rancho Seco Independent Spent Fuel Storage Installation	NRC	August 1994	ML123480187 ^(a) (Redacted)
Environmental Assessment Related to the Construction and Operation of the North Anna Independent Spent Fuel Storage Installation	NRC	March 1997	ML123480192 ^(a) (Redacted)

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Table 1-1. List of NEPA Documents Used in Preparation of this Draft GEIS (cont'd)

Document	Agency	Date	Availability
Reactor License Renewals			
Generic Environmental Impact Statement for License Renewal of Nuclear Plants, Rev. 1	NRC	May 2013	NUREG-1437 ^(b) Vol. 1 ML13106A241 Vol. 2. ML13106A242 Vol. 3. ML13106A244
Supplemental Environmental Impact Statement for Wolf Creek Generating Station License Renewal	NRC	May 2008	NUREG-1437, Supplement 32 ^(b)
New Reactor Licensing			
Environmental Impact Statement for the Combined License (COL) for Enrico Fermi Unit 3	NRC	January 2013	NUREG-2105 ^(b) Vol. 1 ML12307A172 Vol. 2 ML12307A176 Vol. 3 ML12307A177 Vol. 4 ML12307A202
Environmental Impact Statement for Combined Licenses (COLs) for South Texas Project Electric Generating Station Units 3 and 4	NRC	February 2011	NUREG-1937 ^(b) Vol. 1 ML111290826 Vol. 2 ML11049A001
Environmental Impact Statement for the Combined License (COL) for Calvert Cliffs Nuclear Power Plant Unit 3	NRC	May 2011	NUREG-1936 ^(b) ML12026A658
Draft Environmental Impact Statement for Combined Licenses (COLs) for William States Lee III Nuclear Station Units 1 and 2	NRC	December 2011	NUREG-2111 Vol. 1 ML11343A010 Vol. 2 ML11343A011
Previous Waste Confidence Rules and Decisions			
<i>Federal Register</i> Notice – “Consideration of Environmental Impacts of Temporary Storage of Spent Fuel After Cessation of Reactor Operation; Waste Confidence Decision Update; Final Rules”	NRC	December 2010	75 FR 81032
<i>Federal Register</i> Notice – “Waste Confidence Decision Review: Status”	NRC	December 1999	64 FR 68005
<i>Federal Register</i> Notice – “Consideration of Environmental Impacts of Temporary Storage of Spent Fuel After Cessation of Reactor Operation; and Waste Confidence Decision Review; Final Rules”	NRC	September 1990	55 FR 38472

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Table 1-1. List of NEPA Documents Used in Preparation of this Draft GEIS (cont'd)

Document	Agency	Date	Availability
<i>Federal Register</i> Notice – “Waste Confidence Decision and Requirements for Licensee Actions Regarding the Disposition of Spent Fuel Upon Expiration of Reactor Operating Licenses; Final Rules”	NRC	August 1984	49 FR 34658

(a) ADAMS can be accessed [online](#). Accession numbers are provided for EAs.
(b) NUREGs can be found online at the [NRC's website](#).

- 1 The storage of spent fuel *during* the initial licensed term for operation of a nuclear reactor is
2 considered within the site-specific EIS for either a [10 CFR Part 50](#) or 10 [CFR Part 52](#) licensing
3 review.
- 4 The impacts from renewing the operating licenses for commercial nuclear power plants for up to
5 an additional 20 years are evaluated in site-specific EISs, which tier off the License Renewal
6 GEIS ([NRC 2013b](#)). The License Renewal GEIS addresses spent fuel storage *during* the
7 license renewal term. The findings from the License Renewal GEIS with respect to
8 environmental impacts of continued nuclear power plant operations have been codified in
9 regulation (in [10 CFR Part 51, Table B-1 of Appendix B to Subpart A](#)).
- 10 The impacts from storage of spent fuel during the initial and renewed licensed terms of an ISFSI
11 are addressed in site-specific NEPA reviews for licensees that elect to construct ISFSIs with
12 specific licenses under 10 CFR Part 72. For those licensees that elect to construct an ISFSI
13 under a general license, the environmental review has already been conducted and
14 documented in an EA (NRC 1989).
- 15 The impacts from decommissioning nuclear power plants have previously been evaluated in
16 *Final Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities*
17 *Supplement 1 Regarding the Decommissioning of Nuclear Power Reactors Main Report*
18 (Decommissioning GEIS) ([NRC 2002](#)), although the Decommissioning GEIS expressly excludes
19 matters related to the environmental impacts of continued storage.
- 20 The environmental impacts of portions of the uranium fuel cycle that occur before new fuel is
21 delivered to the plant and after spent fuel is sent to a disposal site have been evaluated and are
22 codified in regulation ([10 CFR 51.51, Table S-3](#)).
- 23 Impacts from the transportation of fuel and waste to and from a nuclear power reactor are
24 codified in regulation ([10 CFR 51.52, Table S-4](#)).
- 25 The environmental impacts of residual radioactivity remaining after license termination are
26 addressed in the *Generic Environmental Impact Statement in Support of Rulemaking on*

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1 *Radiological Criteria for License Termination of NRC-Licensed Nuclear Facilities: Final Report*
2 (License Termination Rule GEIS) (NRC 1997).

3 The environmental impacts of a specific geologic repository will be addressed in the EIS that the
4 DOE is required to submit for any geologic repository application that it submits.

5 **1.8.5 Significance of Environmental Impacts**

6 The NRC has established a standard of *significance* for assessing environmental issues. In
7 NRC environmental reviews, significance indicates the importance of likely environmental
8 impacts and is determined by considering two variables: *context* and *intensity*. Context is the
9 geographic, biophysical, and social setting in which the effects will occur. Intensity refers to the
10 severity of the impact, in whatever context it occurs. The NRC uses a three-level standard of
11 significance based upon the President's Council on Environmental Quality guidelines
12 (40 CFR 1508.27):

13 SMALL – Environmental effects are not detectable or are so minor that they will neither
14 destabilize nor noticeably alter any important attribute of the resource. For the purposes
15 of assessing radiological impacts, the Commission has concluded that radiological
16 impacts that do not exceed permissible levels in the Commission's regulations are
17 considered small.

18 MODERATE – Environmental effects are sufficient to alter noticeably, but not to
19 destabilize, important attributes of the resource.

20 LARGE – Environmental effects are clearly noticeable and are sufficient to destabilize
21 important attributes of the resource.

22 For issues in which the significance determination is based on risk (i.e., the probability of
23 occurrence as well as the potential consequences), the probability of occurrence as well as the
24 potential consequences have been factored into the determination of significance. For some
25 resource areas, the impact determination language is specific to the authorizing regulation or
26 statute (e.g., "not likely to adversely impact" for historic and cultural resources).

27 **1.8.6 Issues Eliminated from Review in this GEIS**

28 The NRC is evaluating the continued storage of commercial spent fuel in this draft GEIS. Thus,
29 certain topics are not addressed because they are not within the scope of this review. These
30 topics include:

- 31 • noncommercial spent fuel (e.g., defense waste)
- 32 • commercial high level waste generated from reprocessing

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- 1 • greater-than-class-C LLW
- 2 • advanced reactors (e.g., high-temperature and gas-cooled reactors)
- 3 • foreign spent fuel
- 4 • nonpower reactor spent fuel (e.g., test and research reactors)
- 5 • need for nuclear power
- 6 • reprocessing of commercial spent fuel

7 The “Waste Confidence Generic Environmental Impact Statement Scoping Process Summary
8 Report” (NRC 2013a) provides additional details on topics that are considered out of scope for
9 this draft GEIS.

10 **1.8.7 Draft GEIS Contents**

11 The subsequent chapters of this draft GEIS are organized as follows. Chapter 2 describes
12 typical facility characteristics and activities that are used to assess environmental impacts of
13 continued storage. Chapter 3 describes the affected environment. Chapters 4 and 5 include
14 analyses of potential environmental impacts of at-reactor storage (Chapter 4) and away-from-
15 reactor storage (Chapter 5). Chapter 6 evaluates the cumulative impacts of continued storage
16 with other reasonable past, present, and reasonably foreseeable actions. Chapter 7 provides
17 cost-benefit analyses of the alternatives. Chapter 8 summarizes the findings of the preceding
18 chapters and presents the NRC’s recommendation with respect to which alternative should be
19 chosen. Chapter 9 provides a list of the staff who authored this draft GEIS.

20 Appendices to this draft GEIS provide the following additional information:

- 21 • Appendix A – Scoping Comments
- 22 • Appendix B – Technical Feasibility of Continued Storage and Repository Availability
- 23 • Appendix C – Outreach and Correspondence
- 24 • Appendix D – Draft GEIS Comments and Responses
- 25 • Appendix E – Analysis of Spent Fuel Pool Leaks
- 26 • Appendix F – Spent Fuel Pool Fires
- 27 • Appendix G – Spent Fuel Storage Facilities
- 28 • Appendix H – Estimated Costs of Alternatives

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1 1.9 Other Applicable Federal Requirements

2 **Atomic Energy Act of 1954, as amended** – The Atomic Energy Act of 1954, as amended,
3 provides fundamental jurisdictional authority to the DOE and the NRC over governmental and
4 commercial use of nuclear materials. This Act ensures proper management, production,
5 possession, and use of radioactive materials. To comply with the Act, NRC has established
6 requirements published in Title 10 of the CFR.

7 This Act gives NRC authority to regulate the possession, transfer, storage, and disposal of
8 nuclear materials, as well as aspects of transportation packaging design for radioactive
9 materials that include testing for packaging certification. This Act gives EPA the authority to
10 develop standards for the protection of the environment and public health from radioactive
11 material.

12 **National Environmental Policy Act of 1969, as amended** – The NRC has prepared this draft
13 GEIS in accordance with the NRC's implementing regulations for NEPA (10 CFR Part 51).

14 **Energy Reorganization Act of 1974, as amended** – The Energy Reorganization Act of 1974
15 (Act of 1974), as amended, established the NRC. Under the Atomic Energy Act of 1954, a
16 single agency, the Atomic Energy Commission, had responsibility for the development and
17 production of nuclear weapons and for both the development and the safety regulation of the
18 civilian uses of nuclear materials. The Act of 1974 split these functions, assigning to one
19 agency, now the DOE, the responsibility for the development and production of nuclear
20 weapons, promotion of nuclear power, and other energy-related work, and assigning to the NRC
21 the regulatory work, which does not include regulation of defense nuclear facilities. The Act of
22 1974 gave the Commission its collegial structure and established its major offices. The later
23 amendment to the Act of 1974 also provided protections for employees who identify nuclear
24 safety concerns.

25 **Nuclear Waste Policy Act of 1982, as amended** – The Nuclear Waste Policy Act provides for
26 the research and development of repositories for the disposal of high-level radioactive waste,
27 spent fuel, and low-level radioactive waste. The Act assigns responsibility for the construction
28 of a deep geologic repository to the DOE.

29 **Administrative Procedure Act of 1946, as amended** – The Administrative Procedure Act is
30 the fundamental law governing the processes of Federal administrative agencies. It requires,
31 for example, that affected persons be given adequate notice of proposed rules and an
32 opportunity to comment on the proposed rules. This Act gives interested persons the right to
33 petition an agency for the issuance, amendment, or repeal of a rule. It also provides standards
34 for judicial review of agency actions.

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1 The Administrative Procedure Act has been amended often and now incorporates several other
2 acts. Three of these incorporated acts deal with access to information: The Freedom of
3 Information Act, The Government in the Sunshine Act, and The Privacy Act. The Freedom of
4 Information Act requires that agencies make public their rules, adjudicatory decisions,
5 statements of policy, instructions to staff that affect a member of the public, and, upon request,
6 other material that does not fall into one of the act's exceptions for material dealing with national
7 security, trade secrets, and other sensitive information. The Government in the Sunshine Act
8 requires that collegial bodies such as the Commission hold their meetings in public, with
9 certain exceptions for meetings on matters such as national security. The Privacy Act limits
10 release of certain information about individuals.

11 Two other incorporated acts are noteworthy: The Regulatory Flexibility Act and The
12 Congressional Review Act. The Regulatory Flexibility Act requires that agencies consider the
13 special needs and concerns of small entities in conducting rulemaking. The Congressional
14 Review Act requires that every agency rule be submitted to Congress before being made
15 effective, and that, before being made effective, every "major" rule sit before Congress for
16 60 days, during which time the rule can be subjected to an accelerated process that can lead
17 to a statutory modification or disapproval of the rule.

18 **1.10 References**

19 10 CFR Part 2. *Code of Federal Regulations*, Title 10, *Energy*, Part 2, "Agency Rules of
20 Practice and Procedure." Washington, D.C.

21 10 CFR Part 50. *Code of Federal Regulations*, Title 10, *Energy*, Part 50, "Domestic Licensing of
22 Production and Utilization Facilities." Washington, D.C.

23 10 CFR Part 51. *Code of Federal Regulations*, Title 10, *Energy*, Part 51, "Environmental
24 Protection Regulations for Domestic Licensing and Related Regulatory Functions."
25 Washington, D.C.

26 10 CFR Part 52. *Code of Federal Regulations*, Title 10, *Energy*, Part 52, "Licenses,
27 Certifications, and Approvals for Nuclear Power Plants." Washington, D.C.

28 10 CFR Part 72. *Code of Federal Regulations*, Title 10, *Energy*, Part 72, "Licensing
29 Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive
30 Waste, and Reactor-Related Greater Than Class C Waste." Washington, D.C.

31 40 CFR Parts 1500 through 1508. *Code of Federal Regulations*, Title 40, *Protection of*
32 *Environment*, Parts 1500 "Purpose, Policy, and Mandate" through 1508 "Terminology and
33 Index." Washington, D.C.

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- 3 44 FR 61372. October 25, 1979. “Storage and Disposal of Nuclear Waste.” *Federal Register*,
4 U.S. Nuclear Regulatory Commission, Washington, D.C.
- 5 49 FR 34658. August 31, 1984. “Waste Confidence Decision and Requirements for Licensee
6 Actions Regarding the Disposition of Spent Fuel Upon Expiration of Reactor Operating
7 Licenses; Final Rules.” *Federal Register*, U.S. Nuclear Regulatory Commission,
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- 9 49 FR 34688. August 31, 1984. “Waste Confidence Decision.” *Federal Register*, U.S. Nuclear
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12 Storage of Spent Fuel After Cessation of Reactor Operation; and Waste Confidence Decision
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14 Washington, D.C.
- 15 55 FR 38474. September 18, 1990. “Waste Confidence Decision Review.” *Federal Register*,
16 U.S. Nuclear Regulatory Commission, Washington, D.C.
- 17 64 FR 68005. December 6, 1999. “Waste Confidence Decision Review: Status.” *Federal*
18 *Register*, U.S. Nuclear Regulatory Commission, Washington, D.C.
- 19 74 FR 66589. December 16, 2009. “10 CFR 72 and 73.” *Federal Register*, U.S. Nuclear
20 Regulatory Commission, Washington D.C.
- 21 75 FR 81032. December 23, 2010. “Consideration of Environmental Impacts of Temporary
22 Storage of Spent Fuel After Cessation of Reactor Operation; Waste Confidence Decision
23 Update; Final Rules.” *Federal Register*, U.S. Nuclear Regulatory Commission,
24 Washington, D.C.
- 25 75 FR 81037. December 23, 2010. “Waste Confidence Decision Update.” *Federal Register*,
26 U.S. Nuclear Regulatory Commission, Washington, D.C.
- 27 77 FR 65137. October 25, 2012. “Notice of Intent To Prepare an Environmental Impact
28 Statement for the Consideration of Environmental Impacts of Temporary Storage of
29 Spent Fuel After Cessation of Reactor Operation.” *Federal Register*, U.S. Nuclear Regulatory
30 Commission, Washington, D.C.
- 31 Administrative Procedures Act. 5 USC 500, *et seq.*
- 32 Atomic Energy Act of 1954. 42 USC 2011, *et seq.*

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- 1 Congressional Review Act. 5 USC 801–808.
- 2 DOE (U.S. Department of Energy). 1997. *Waste Isolation Pilot Plant Disposal Phase Final*
3 *Supplemental Environmental Impact Statement*. DOE/EIS-0026-S-2, Carlsbad Area Office,
4 Carlsbad, New Mexico. Available at <http://www.wipp.energy.gov/library/seis/MainMenu.pdf>
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- 6 DOE (U.S. Department of Energy). 2000. *Savannah River Site Long Range Comprehensive*
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- 8 DOE (U.S. Department of Energy). 2002. *Savannah River Site High-Level Waste Tank Closure*
9 *Final Environmental Impact Statement*. DOE/EIS-0303, Savannah River Operations Office,
10 Aiken, South Carolina. Available at [http://www.doe.gov/sites/prod/files/EIS-0303-FEIS-01-](http://www.doe.gov/sites/prod/files/EIS-0303-FEIS-01-2002.pdf)
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2.0 Generic Facility Descriptions and Activities

This chapter describes typical facility characteristics and activities that the U.S. Nuclear Regulatory Commission (NRC) used to assess environmental impacts that may occur from continued storage of spent nuclear fuel (spent fuel) beyond the licensed life for operation of a reactor (continued storage).

2.1 Generic Facility Descriptions

Most commercial spent fuel is stored at reactor sites in spent fuel pools and at-reactor independent spent fuel storage installations (ISFSIs). Some commercial spent fuel is stored under NRC regulatory oversight at away-from-reactor ISFSIs such as the GE-Hitachi Nuclear Energy Americas, LLC, Morris wet storage facility in Morris, Illinois (GEH Morris) and the U.S. Department of Energy's (DOE) Three Mile Island, Unit 2, Fuel Debris ISFSI at the Idaho National Engineering Laboratory.^{1,2} The remainder of the commercial spent fuel has either been reprocessed at the former Nuclear Fuel Services reprocessing facility in western New York or removed from reactor sites by the DOE, or its predecessor agencies, and is no longer regulated by the NRC. The spent fuel addressed by the generic analysis in this draft *Waste Confidence Generic Environmental Impact Statement* (draft GEIS) is the commercial spent fuel regulated by the NRC. Spent fuel or commercial high-level waste derived from reprocessing of spent fuel under the control of other agencies of the Federal government is not included in this generic analysis. Additional information on the scope of this draft GEIS is presented in Chapter 1.

The following sections provide generic descriptions of NRC-licensed facilities that store commercial spent fuel, with an emphasis on characteristics relevant to continued storage. These descriptions provide physical context for the generic activities described in Section 2.2.

2.1.1 At-Reactor Continued Storage Site Descriptions

The following sections describe the general characteristics of at-reactor continued storage sites, which are identical to nuclear power plant sites.

¹ DOE holds three ISFSI licenses from NRC: (1) the Fort St. Vrain at-reactor ISFSI in Platteville, Colorado; (2) the away-from-reactor Three Mile Island ISFSI; and (3) the yet-to-be-constructed away-from-reactor Idaho Spent Fuel Facility.

² In 2006, the NRC granted a license to Private Fuel Storage, LLC (PFS), to construct and operate an away-from-reactor ISFSI in Skull Valley, Utah. PFS did not construct the proposed ISFSI and, on December 20, 2012, it submitted a request to the NRC to terminate its license (PFS 2012).

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Generic Facility Descriptions and Activities

1 2.1.1.1 General Description of Single-Unit Nuclear Power Plant Site

2 This section describes a generic single-unit nuclear power plant site, which is where continued
3 storage will occur in spent fuel pools and at-reactor ISFSIs. Key differences between a single-
4 unit site and multiple-unit site, relevant to continued storage, are described in Section 2.1.1.2.

5 A nuclear power plant site, including its associated ISFSI, contains a number of buildings or
6 structures. Among them are a containment building or reactor building, turbine building,
7 auxiliary building, vent stacks, meteorological towers, and cooling systems (which may include
8 cooling towers). A nuclear power plant also includes large parking areas, security fencing,
9 switchyards, water-intake and -discharge facilities, and transmission lines. While reactor,
10 turbine, and auxiliary buildings are often clad or painted in colors that are intended to reduce or
11 mitigate their visual presence, the heights of many of the structures, coupled with safety lights,
12 make power plants visible from many directions and from great distances. Typical heights of
13 structures found on these facilities are as follows: reactor buildings are 90 m (300 ft), turbine
14 buildings are 30 m (100 ft), stacks are 90 m (300 ft), meteorological towers are 60 m (200 ft),
15 natural draft cooling towers are higher than 150 m (500 ft), and mechanical draft cooling towers
16 are 30 m (100 ft) tall. Transmission-line towers are between 20 and 50 m (70 and 170 ft) in
17 height, depending on the voltage being carried (NRC 2013a).

18 There are two types of power reactors currently in use in the United States—boiling water
19 reactors (BWRs) and pressurized water reactors (PWRs). In general, all nuclear power plant
20 sites, when operating, are similar in terms of the types of onsite structures; however, the layout
21 of buildings and structures varies considerably among the sites. In addition, while these
22 buildings and structures are necessary during operations, many of the structures may be
23 removed, mothballed, or entombed as a result of the decommissioning process, depending on
24 several factors, including which decommissioning option licensees select and other operational
25 considerations. Many of these structures will be present at the beginning of continued storage
26 analyzed in this draft GEIS. As decommissioning of the reactor facility progresses, the number
27 of onsite structures will decline until only continued storage-related structures are present at the
28 beginning of the long-term storage timeframe. The following list describes typical structures
29 located on most sites following the permanent cessation of reactor operations (NRC 2013a):

- 30 • *Containment or reactor building.* The containment or reactor building of a PWR is a massive
31 concrete or steel structure that houses the reactor vessel, reactor coolant piping and pumps,
32 steam generators, pressurizer, pumps, and associated piping. In general, the reactor
33 building of a BWR includes a containment structure and a shield building. The reactor
34 containment building is a massive steel and concrete structure that houses the reactor
35 vessel, the reactor coolant piping and pumps, and the suppression pool. It is located inside
36 a shield building.
- 37 • *Fuel building.* For PWRs, the fuel building has a fuel pool that is used to store and service
38 spent fuel and prepare new fuel for insertion into the reactor. This building is connected to

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Generic Facility Descriptions and Activities

- 1 the reactor containment building by a transfer tube or channel that is used to move new fuel
2 into the reactor and move spent fuel out of the reactor for storage. For plants with a
3 BWR/6 reactor, spent fuel is stored in an adjacent Fuel Building or Fuel Handling Building.
- 4 • *Turbine building.* The turbine building houses the turbine generators, condenser, feedwater
5 heaters, condensate and feedwater pumps, waste-heat rejection system, pumps, and
6 equipment that support those systems.
 - 7 • *Auxiliary buildings.* Auxiliary buildings house support systems (e.g., the ventilation system,
8 emergency core cooling system, laundry facilities, water treatment system, and waste
9 treatment system). An auxiliary building may also contain the emergency diesel generators
10 and, in some PWRs, the diesel fuel storage facility.
 - 11 • *Diesel generator building.* Often a separate building houses the emergency diesel
12 generators if they are not located in the auxiliary building.
 - 13 • *Pump houses.* Various pump houses for circulating water, standby service water, or
14 makeup water may be onsite.
 - 15 • *Cooling towers.* Cooling towers are structures designed to remove excess heat from the
16 condenser without dumping the heat directly into waterbodies (e.g., lakes or rivers). The
17 two principal types of cooling towers are mechanical draft towers and natural draft towers.
18 Most nuclear plants with once-through cooling do not have cooling towers. However, seven
19 facilities with once-through cooling also have cooling towers that are used to reduce the
20 temperature of the water before it is released to the environment.
 - 21 • *Radwaste facilities.* Radioactive waste facilities may be contained in an auxiliary building or
22 located in a separate radwaste building.
 - 23 • *Ventilation stack.* Many older nuclear power plants, particularly BWRs, have ventilation
24 stacks to discharge gaseous waste effluents and ventilation air directly to the outside.
25 These stacks can be 90 m (300 ft) tall or higher and contain monitoring systems to ensure
26 that radioactive gaseous discharges are below fixed release limits.
 - 27 • *Switchyard and transmission lines.* Facilities typically contain a large switchyard that
28 connects the site to the regional power distribution system.
 - 29 • *Administrative, training, and security buildings.* In most cases, administrative, training, and
30 security buildings are located outside the protected area of the plant.
 - 31 • *Independent spent fuel storage installations.* An ISFSI is designed and constructed for the
32 interim storage of spent fuel pending permanent disposal. ISFSIs are used by operating
33 plants to add spent fuel storage capacity beyond that available in spent fuel pools.
- 34 Nuclear power plant facilities are large industrial complexes with land-use requirements
35 generally amounting to 40 to 50 ha (100 to 125 ac) for the reactor containment building,

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1 auxiliary buildings, cooling system structures, administration and training offices, and other
2 facilities (e.g., switchyards, security facilities, and parking lots). Areas disturbed during
3 construction of the power plant generally have been returned to prior uses or were ecologically
4 restored when construction ended. Site areas range from 34 ha (84 ac) for the San Onofre
5 plant in California to 5,700 ha (14,000 ac) for the Clinton plant in Illinois. Almost 60 percent of
6 plant sites encompass 200 to 800 ha (500 to 2,000 ac), with 28 site areas ranging from 200 to
7 400 ha (500 to 1,000 ac) and an additional 12 sites encompassing 400 to 800 ha (1,000 to
8 2,000 ac). Larger land areas are often associated with elaborate man-made closed-cycle
9 cooling systems that include cooling lagoons, spray canals, reservoirs, artificial lakes, and buffer
10 areas (NRC 2013a).

11 Nuclear power plant sites are located in a range of political jurisdictions, including towns,
12 townships, service districts, counties, parishes, and states. Typically, the nearest resident lives
13 about 0.4 km (0.25 mi) from a nuclear power plant and ISFSI. At more than 50 percent of the
14 sites, the population density within a 80-km (50-mi) radius is fewer than 77 persons/km²
15 (200 persons/mi²), and at more than 80 percent of the sites, the density within 80 km (50 mi) is
16 fewer than 193 persons/km² (500 persons/mi²). The largest population density is around the
17 Indian Point Nuclear Generating Station in upper Westchester County, New York, which has a
18 population density within 80 km (50 mi) of more than 825 persons/km² (2,138 persons/mi²).
19 Within the 80-km (50-mi) radius, State, Federal, and Native American lands are present to
20 various extents (NRC 2013a).

21 The nuclear power plant structures that are used for continued storage of spent fuel, namely
22 spent fuel pools and at-reactor ISFSIs, are described in more detail in Section 2.1.2 of this draft
23 GEIS. Power plant-specific data on spent fuel pools and ISFSIs is provided in Appendix G of
24 this draft GEIS. As shown in Appendix G, spent fuel pool licensed capacities at single-unit
25 PWR power plants range from 544 assemblies at H.B. Robinson Steam Electric Plant, Unit 2, to
26 2,363 assemblies at the Callaway Plant and Wolf Creek Generating Station. At BWR plants,
27 spent fuel pool capacities range from 1,803 assemblies at the Brunswick Steam Electric
28 Generating plant to 4,608 assemblies at Fermi Unit 2.

29 **2.1.1.2 General Description of Multiple-Unit Nuclear Power Plant Sites**

30 During continued storage at a multiple-unit site, other onsite reactors may be in different
31 stages of their life cycles: under construction; operating; or decommissioning. Subject to
32 NRC regulations that ensure independence of safety systems, multiple reactors may share
33 systems, structures, and components (e.g., a spent fuel pool). Existing nuclear power
34 plants with shared spent fuel pools are summarized in Table 2-1. Dresden Units 2 and 3
35 and Comanche Peak Units 1 and 2 do not share a pool, but have two pools in one structure.
36 Other common structures at multiple-unit sites include cooling system infrastructure,
37 switchyards, and ISFSIs (Sailor et al. 1987).

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1 **Table 2-1.** U.S. Pressurized Water Reactors with Shared Spent Fuel Pools

Power Plant^(a)	Shared Pool Capacity Assemblies (cores)
Braidwood	2,984 (13.5)
Byron	2,984 (13.5)
Calvert Cliffs	1,830 (8.4)
D.C. Cook	3,613 (18.7)
North Anna	1,737 (11.1)
Oconee ^(b)	1,312 (7.4)
Point Beach	1,502 (12.4)
Prairie Island	1,582 (13.1)
Surry Units	1,044 (6.6)
Zion ^(c)	3,012 (15.6)

(a) Source: Individual plant operating licenses www.nrc.gov.
(b) Oconee Units 1 and 2 share a pool. Unit 3 has a separate pool.
(c) Zion Units 1 and 2 were permanently shut down on February 13, 1998.

2 As noted in the Decommissioning GEIS (NRC 2002a), licensees that choose to shut down one
3 reactor at a multi-reactor site usually choose a decommissioning option that allows the
4 shutdown reactor to be placed in a safe, stable condition and maintained in that state until other
5 reactors shut down, so that all reactors at a site can be decommissioned simultaneously.³ In
6 these cases, a licensee may opt to store spent fuel in the shutdown reactor's spent fuel pool
7 until all reactors undergo decommissioning. Alternatively, the licensee may transfer some or all
8 of the spent fuel in the shutdown reactor's spent fuel pool to spent fuel pools for the other
9 operating reactors or to an at-reactor or away-from-reactor ISFSI, and begin some
10 dismantlement activities in the shutdown reactor's spent fuel pool. As discussed in Chapter 1,
11 the NRC assumes that, in compliance with current decommissioning requirements, all of a
12 reactor's spent fuel will have been removed from the spent fuel pool within 60 years after the
13 end of the reactor's licensed life for operation.

14 **2.1.1.3 Reactor and Fuel Technologies**

15 Several commercial reactor designs have been built and operated in the United States. As
16 described below, the generic analysis in this draft GEIS is focused on past, present, and future
17 spent fuel types that will be subject to a future NRC licensing action. These fuel types include:
18 fuel types that have been used in the past and continue to be stored under an NRC license; fuel
19 types that are presently used; and fuel types for which the characteristics are similar to fuel
20 used today, are well understood, and may be used in the near future.

³ See Section 2.2 below for a description of the SAFSTOR option.

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Generic Facility Descriptions and Activities

1 **Light Water Reactors**

2 The majority of reactors that have been licensed for commercial operation in the United States,
3 including the currently operating nuclear power plants and those under construction, are light
4 water reactors. Light water reactors use ordinary water as coolant and a neutron moderator to
5 initiate and control the nuclear reaction. The two light water reactor designs in use are PWRs
6 and BWRs. There are 69 PWRs and 35 BWRs operating in the United States today.⁴ This is
7 important for the generic analysis of continued storage because these reactors all use similar
8 fuel, which means that the NRC can generically consider the environmental impacts of
9 continuing to store spent fuel after a reactor's licensed life for operation.

10 The nuclear fuel typically used in both types of
11 reactors is uranium enriched to a concentration of 2
12 to 5 percent of the uranium-235 isotope. The fuel is
13 in the form of cylindrical uranium dioxide (UO₂)
14 pellets, approximately 1 cm (0.4 in) in diameter and
15 1 to 1.5 cm (0.4 to 0.6 in) in height. The fuel pellets
16 are stacked and sealed inside a hollow cylindrical
17 fuel rod made of zirconium alloy. As described

Enrichment: *Enriching uranium increases the proportion of uranium atoms that can be "split" by fission to release energy (usually in the form of heat) that can be used to produce electricity.*

18 further below, a small amount of stainless-steel-clad fuel was used in the past and is still being
19 stored under NRC licenses. The fuel rods are approximately 4.3 m (14 ft) long. They are
20 bundled into fuel assemblies that generally consist of 15 × 15 or 17 × 17 rods for PWRs and
21 8 × 8 or 10 × 10 rods for BWRs. For PWRs, there are typically 150 to 200 fuel assemblies,
22 containing between 179 and 264 fuel rods per assembly, loaded into the core when operating.
23 For BWRs, there are typically between 370 and 800 fuel assemblies, containing between 91
24 and 96 fuel rods per assembly, loaded into the core when operating. The mass of uranium fuel
25 in a typical light water reactor core is about 90 MTU, regardless of whether the reactor is a PWR
26 or BWR design.

27 As shown in Table 2-2, fuel with stainless-steel cladding was used at five plants that are all shut
28 down. LaCrosse was the last decommissioning plant to transfer its stainless-clad fuel from its
29 pool into an at-reactor dry storage ISFSI in September 2012 (UxC 2013). Some of the Haddam
30 Neck and San Onofre Unit 1 stainless-clad fuel is stored at the GEH Morris away-from-reactor
31 ISFSI and the remainder is in at-reactor dry storage. The continued storage of this fuel is
32 covered by NRC licenses.

⁴ Crystal River Nuclear Generating Plant, Unit 3, and Kewaunee Power Station, both PWRs, have announced plans to permanently cease operations.

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Generic Facility Descriptions and Activities

1

Table 2-2. Stainless-Steel-Clad Fuel at Decommissioning Plants

Plant	Discharged Stainless-Clad Assemblies^(a)	Stored at GEH Morris ISFSI^(b)
Haddam Neck	945 ^(c)	82
Indian Point Unit 1	160	---
LaCrosse	333	---
San Onofre Unit 1	665	270
Yankee Rowe	76	---
Total	2,179	352

Sources:
(a) EIA 1994.
(b) NRC 2004a.
(c) S. Cohen & Associates, Inc. 1998.

2 The amount of spent fuel accumulated at a reactor over its licensed life depends on factors such
3 as how long the reactor operates each year, the duration of outages, spent fuel burnup, and
4 operating lifetime. For purposes of analysis in this draft GEIS, the NRC assumes reactors
5 operate with high capacity factors and short outages, which results in the generation of more
6 spent fuel.

7 Spent fuel burnup describes the extent to which energy has been extracted from nuclear fuel.
8 Burnup is the actual energy released per mass of initial fuel in GWd/MTU. Spent fuel is
9 considered to have low burnup if the burnup is less than 45 GWd/MTU. At low burnups, about
10 one-fourth to one-third of the spent fuel assemblies are removed from the reactor and replaced
11 every 12 to 18 months. Therefore, the amount of spent fuel discharged from a light water
12 reactor to its spent fuel pool is about 20 MTU per year. After 80 years of reactor operation, this
13 amounts to about 1,600 MTU of spent fuel. A reactor could operate for 80 years if the licensee
14 requested, and the NRC granted, two 20-year renewals of its initial 40-year operating license.

15 Currently, the average discharge burnup for PWRs and BWRs is approximately 48 and
16 43 GWd/MTU, respectively (EPRI 2010). By 2020 it is projected that the maximum discharge
17 burnups for PWRs and BWRs will be 58 and 48 GWd/MTU, respectively (EPRI 2010). The
18 current trend toward extended irradiation cycles and higher fuel enrichments of up to 5 weight
19 percent uranium-235 has led to an increase of the burnup range for discharged nuclear fuel
20 assemblies in the United States that is expected to exceed 60 GWd/MTU. For plants at which
21 higher fuel burnups are authorized, the period between outages may be extended to 24 months
22 and the annual discharge of spent fuel reduced to about 15 MTU per year. Should a nuclear
23 power plant operate for up to 80 years with high-burnup fuel, it would generate about
24 1,200 MTU of spent fuel. For purposes of analysis in this draft GEIS, the NRC relies for
25 impact analysis on the larger reactor lifetime amount of spent fuel discharged at low burnups
26 (i.e., 1,600 MTU), unless otherwise stated in the description of environmental impacts. This is
27 because many of the environmental impacts (e.g., land use, geology and soils, and terrestrial

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1 resources) will depend upon the greater amount of space needed to store the larger amounts of
2 spent fuel that would be generated at low burnups. In cases where high-burnup fuel is a
3 consideration in the impact determination, which is the case with spent fuel pool fires, this is
4 explained in the supporting analysis.

5 Mixed Oxide Fuel

6 Mixed oxide (MOX) fuel is a type of nuclear reactor fuel that contains plutonium oxide mixed
7 with either natural or depleted uranium oxide in ceramic pellet form. Using plutonium reduces
8 the amount of enriched uranium needed to produce a controlled reaction in commercial light
9 water reactors. MOX fuel was produced and used in the United States prior to the mid-1970s;
10 during that time, the United States reprocessed nuclear fuel and recovered plutonium for reuse
11 as MOX fuel in light water reactors. MOX fuel was used at Quad Cities, San Onofre, Big Rock
12 Point, Dresden Unit 1 and, as recently as 2005–2008, Catawba Unit 1. Catawba Unit 1 used
13 four MOX lead test assemblies that were part of a nonproliferation project conducted by the
14 National Nuclear Security Administration. Because the MOX fuel is substantially similar to
15 existing uranium oxide light water reactor fuel and was, in fact, used in existing light water
16 reactors in the United States, it is within the scope of this draft GEIS.

17 MOX fuel is not currently being produced in the United States; however, an application is
18 pending before the NRC for Shaw AREVA MOX Services (formerly Duke COGEMA Stone &
19 Webster) to manufacture MOX fuel at the Mixed Oxide Fuel Fabrication Facility at the Savannah
20 River Site in South Carolina as part of the National Nuclear Security Administration's ongoing
21 nonproliferation project. The MOX fuel proposed to be manufactured by Shaw AREVA MOX
22 Services is a blend of plutonium dioxide, extracted from retired nuclear weapons and other
23 sources of surplus plutonium, and depleted uranium dioxide, which is a byproduct of the
24 uranium enrichment process. Because the MOX fuel that would be generated at the Mixed
25 Oxide Fuel Fabrication Facility is substantially similar to existing light water reactor fuel and is,
26 in fact, intended for use in existing light water reactors in the United States, MOX fuel from this
27 project is within the scope of this draft GEIS.

28 Integral Pressurized Water Reactors

29 The NRC is preparing to review a number of integral pressurized water reactor (iPWR) designs
30 that are currently under development. An iPWR is a small modular reactor that uses light water
31 reactor technology. Current iPWR designs employ light water reactor technology with current
32 design fuel and secondary loop steam generators, but also incorporate a number of advanced
33 features and characteristics (NRC 2012a). The NRC is currently engaged in preapplication
34 activities with several applicants for light water small modular reactors.

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Generic Facility Descriptions and Activities

1 Because the light water reactor fuel that would be used in iPWR designs is substantially similar
2 to existing light water reactor fuel (i.e., zirconium-clad, low-enriched uranium oxide pellets in
3 square fuel rod arrays), it is within the scope of this draft GEIS.

4 ***Other Commercial Reactor and Fuel Designs***

5 In addition to light water reactors, two other reactor technologies are sufficiently well developed
6 to be deployed for use as commercial nuclear power plants: the high-temperature gas-cooled
7 reactor and the liquid metal fast reactor. As described in more detail below, with the exception
8 of high-temperature gas reactor fuel stored in the Fort Saint Vrain ISFSI, spent fuel generated
9 by these technologies is not within the scope of the analysis in this draft GEIS because neither
10 technology is in commercial use or under development in the United States at this time.

11 High-Temperature Gas-Cooled Reactors

12 A high-temperature gas-cooled reactor is a type of nuclear fission reactor that typically operates
13 at a very high temperature, is graphite-moderated, and uses an inert gas such as helium as its
14 primary coolant. Fuel may be loaded in the core in a prismatic or pebble bed design. In the
15 United States, there have been two high-temperature gas-cooled reactors built and
16 commercially operated: Fort Saint Vrain and Peach Bottom Unit 1. Fort Saint Vrain has been
17 decommissioned, and Peach Bottom Unit 1 is in the process of decommissioning. The
18 Fort Saint Vrain spent fuel continues to be stored at an NRC-licensed ISFSI in Platteville,
19 Colorado, and is within the scope of this draft GEIS.⁵ Peach Bottom Unit 1 fuel is under Federal
20 government control at the Idaho National Laboratory and is not within the scope of this draft
21 GEIS because it is no longer regulated by the NRC.

22 The NRC is participating in preapplication reviews of the DOE's Next Generation Nuclear Plant.
23 The Next Generation Nuclear Plant would use nuclear fuel comprised of tristructural-isotropic-
24 coated fuel particles contained in either fuel pebbles or prismatic fuel assemblies. The uranium
25 oxycarbide kernels in each particle would be encapsulated in successive layers of silicon
26 carbide and pyrolytic carbon.

27 Because this fuel type has not completed fuel qualification testing, it is not yet a commercially
28 viable technology. If this technology should become viable and the NRC is asked to review one
29 or more license applications for a high-temperature gas-cooled reactor facility, then the
30 environmental impacts of continued storage of spent fuel will be considered in individual
31 licensing proceedings unless the NRC updates the GEIS and corresponding rule to include the
32 environmental impacts of storing this type of fuel after a reactor's licensed life for operation.

⁵ The NRC renewed the operating license for the Fort St. Vrain ISFSI in May 2011, after completing an environmental assessment and finding of no significant impact (76 FR 30399).

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Generic Facility Descriptions and Activities

1 Liquid Metal Fast Reactor

2 Liquid metal fast reactors use a molten metal (e.g., sodium) as their primary coolant. Fuel for a
3 liquid metal fast reactor varies by concept, but typically consists of a mix of uranium and
4 zirconium or a mix of uranium, plutonium, and zirconium. In the United States, Enrico Fermi
5 Unit 1 was a liquid-sodium-cooled fast reactor that operated between 1963 and 1972. Fermi
6 Unit 1 is in the process of decommissioning and all spent fuel has been removed from the site
7 and is now the responsibility of the DOE.

8 The NRC is engaged in preliminary preapplication discussions with the designers of three liquid
9 metal fast reactors—Toshiba Corporation's Super-Safe, Small and Simple design, General
10 Electric Hitachi's Power Reactor Innovative Small Module design, and Gen4 Energy's Gen4
11 Module design. The fuel types in these designs range from a mix of uranium-zirconium or
12 uranium-plutonium-zirconium metal alloys to stainless-steel-clad uranium nitride.

13 These fuel types have not completed fuel qualification testing and are not yet commercially
14 viable technologies. If these technologies should become viable and the NRC is asked to
15 review one or more license applications for a liquid metal fast reactor facility, then the
16 environmental impacts of continued storage of spent fuel will be considered in individual
17 licensing proceedings unless the NRC updates the GEIS and corresponding rule to include the
18 environmental impacts of storing this type of fuel after a reactor's licensed life for operation.

19 **2.1.2 Onsite Spent Fuel Storage and Handling**

20 As of the end of 2011, the amount of commercial spent fuel in storage at commercial nuclear
21 power plants is an estimated 67,500 MTU. The amount of spent fuel in storage at commercial
22 nuclear power plants is expected to increase at a rate of approximately 2,000 MTU per year
23 (NRC 2012a).

24 Licensees have designed spent fuel pools to temporarily store spent fuel in pools of
25 continuously circulating water that cool the spent fuel assemblies and provide shielding from
26 radiation. When industry designed the current fleet of operating nuclear power plants, it
27 expected that, after a few years, the plant operators would transport spent fuel to one or more
28 reprocessing plants. However, as a result of historic decision-making on reprocessing⁶ no
29 commercial spent fuel reprocessing facilities are currently operating or planned in the
30 United States (NRC 2012b).

⁶ In furtherance of anti-proliferation policies, the Federal government declared a moratorium on reprocessing spent fuel in 1976. This moratorium was lifted in 1981, but in 1993, President Clinton issued a policy statement that the United States does not encourage civil use of plutonium, including reprocessing. In 2001, President Bush's National Energy Policy encouraged research into reprocessing technologies. Currently, there is no Federal moratorium on reprocessing.

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1 2.1.2.1 Spent Fuel Pools

2 Spent fuel pools are designed to store and cool spent fuel following its removal from a reactor.
3 Spent fuel pools are massive and durable structures constructed from thick, reinforced-concrete
4 walls and slabs that vary between 0.7 and 3 m (2 and 10 ft) thick. Typically, spent fuel pools are
5 at least 12 m (40 ft) deep, allowing the spent fuel to be covered by at least 6 m (20 ft) of water,
6 which provides adequate shielding from the radiation for anyone near the pool. All spent fuel
7 pools currently in operation are lined with stainless-steel liners that vary in thickness from 6 to
8 13 mm (0.25 to 0.5 in.). Further, all spent fuel pools have either a leak-detection system or
9 administrative controls to monitor the spent fuel pool liner (NRC 2012a). Typically, leak-
10 detection systems are made up of several individually monitored channels or are designed so
11 that leaked water empties into monitored drains. Leaked water is directed to a sump, liquid
12 radioactive waste treatment system, or other cleanup or collection system.

13 Reactor designers originally anticipated that spent fuel would be stored for less than 1 year
14 before being shipped to a reprocessing plant for separation of the fissile isotopes. For this
15 reason, currently operating reactors originally had storage capacity for one full core plus one or
16 two additional discharged batches of spent fuel. When the United States abandoned spent fuel
17 reprocessing and spent fuel pools began to fill up, licensees expanded fuel storage capacity by
18 replacing the original storage racks with higher density fuel racks. Licensees achieved the
19 higher density by taking into account in their safety assessments the neutron-absorbing
20 characteristics of the stainless-steel structure of the storage racks and incorporating plates or
21 sheets containing a neutron absorber material for reactivity control (EPRI 1988). As a result, a
22 typical spent fuel pool at a light water reactor now holds the equivalent of about six reactor core
23 loads, or about 700 MTU (see Appendix G).

24 On this basis, the NRC has adopted as its reference spent fuel pool, one that has 700 MTU
25 storage capacity that reaches its licensed capacity limit in about 35 years into licensed life for
26 operation of a reactor. At that point, some of the spent fuel would need to be removed from the
27 spent fuel pool and transferred to a dry cask storage system at either an at-reactor or away-
28 from-reactor ISFSI.

29 Two events have resulted in changes to NRC requirements for physical security and the safe
30 operation of spent fuel pools. The first was the terrorist attacks on September 11, 2001. The
31 NRC ordered all operating nuclear power plants to immediately implement compensatory
32 security measures. In addition, the NRC issued orders to decommissioning reactor licensees
33 that imposed additional security measures associated with access authorization, fitness for duty,
34 and behavior observation. In 2009, the NRC completed a rulemaking that codified generally
35 applicable security requirements for operating power plants (74 FR 13926).

36 Second, in response to the March 11, 2011 severe earthquake and subsequent tsunami that
37 resulted in extensive damage to the six nuclear power reactors at Japan's Fukushima Dai-ichi

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Generic Facility Descriptions and Activities

1 site, the NRC established a task force of senior agency experts (Near-Term Task Force). On
2 July 12, 2011, the Near-Term Task Force issued its report, which concluded that there was no
3 imminent risk from continued operation and licensing activities (NRC 2011a). Based on its
4 analysis, the Near-Term Task Force made 12 overarching recommendations for changes to
5 ensure the continued safety of U.S. nuclear power plants.

6 Several of these recommendations addressed spent fuel pool integrity and assurance of
7 adequate makeup water in the event of a serious accident. In response to the Near-Term Task
8 Force's recommendations, the NRC issued multiple orders and a request for information to all of
9 its nuclear power plant licensees on March 12, 2012. The orders addressed: (1) mitigating
10 strategies for beyond-design basis external events; and (2) reliable spent fuel pool
11 instrumentation. In addition, the NRC issued a formal request for information to all licensees to
12 assist the agency in reevaluating seismic and flooding hazards at operating reactor sites and
13 determining whether appropriate staffing and communication can be relied upon to coordinate
14 event response during a prolonged station blackout event, as was experienced at Fukushima
15 Dai-ichi. The NRC will use the information collected to determine whether to update the design
16 basis and systems, structures, and components important to safety, including spent fuel pools.
17 However, because the NRC has not yet received responses to the request for information and
18 has not decided whether any license needs to be modified, suspended, or revoked, for
19 purposes of analysis in this draft GEIS, the NRC assumes that the existing regulatory
20 framework remains unchanged.

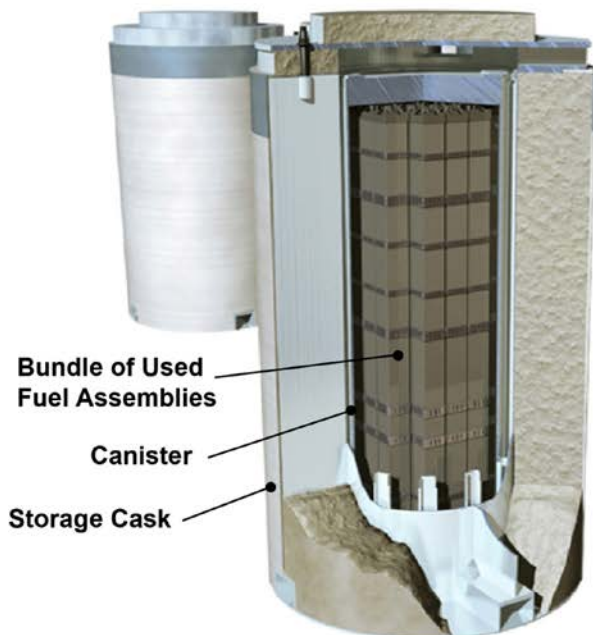
21 **2.1.2.2 At-Reactor Independent Spent Fuel Storage Installations**

22 Spent fuel pools, as discussed above, have limited capacity to store a reactor's spent fuel. As
23 noted, the NRC has adopted a reference pool of 700 MTU storage capacity that reaches its
24 licensed capacity limit about 35 years into licensed life for operation of a reactor. At that point,
25 the licensee needs a dry cask storage system to store older fuel that has cooled sufficiently and
26 can be removed safely from the pool. These dry cask storage systems are located in ISFSIs at
27 reactor sites and are licensed by the NRC. Dry cask storage shields people and the
28 environment from radiation and keeps the spent fuel dry and nonreactive (NRC 2012a).

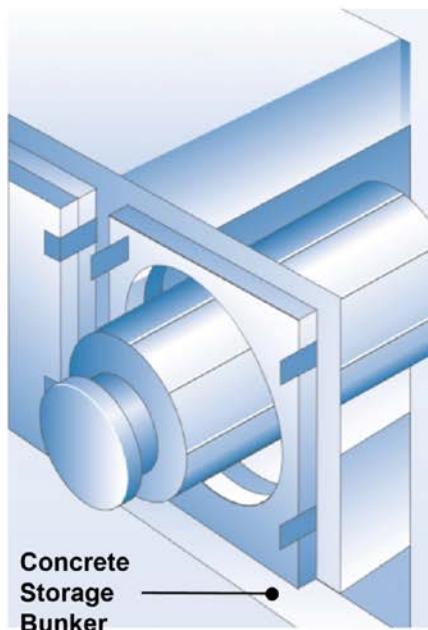
29 There are many different dry cask storage systems, but most fall into two main categories based
30 on how they are loaded. The first is the bare fuel, or direct-load, casks, in which spent fuel is
31 loaded directly into a basket that is integrated into the cask. Bare fuel casks, which tend to be
32 all metal construction, are generally bolted closed. The second is a canister-based system in
33 which spent fuel is loaded into a basket inside a cylinder called a canister. The canister is
34 usually loaded while inside a transfer cask, then welded and transferred vertically into either a
35 concrete or metal storage overpack or horizontally into a concrete storage module
36 (e.g., NUHOMS) (DOE 2012a). Typical dry cask storage systems are shown in Figure 2-1.

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Generic Facility Descriptions and Activities



At some nuclear reactors across the country, spent fuel is kept on site, typically above ground, in systems basically similar to the ones shown here. Once the spent fuel has sufficiently cooled, it is loaded into special canisters that are designed to hold nuclear fuel assemblies (shown left). Water and air are removed. The canister is filled with inert gas, welded shut and rigorously tested for leaks. The dry casks are then loaded onto concrete pads. Some systems store fuel vertically (bottom left) and some are oriented horizontally (bottom right).



- 1
- 2
- 3

Figure 2-1. Dry Storage of Spent Fuel (Source: NRC 2012a)

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Generic Facility Descriptions and Activities

1 Dry cask storage systems are licensed by the NRC for storage only or for storage and
2 transportation. Storage-only casks are not certified for transportation under 10 CFR Part 71,
3 “Packaging and Transportation of Radioactive Material.” Casks and canisters licensed for both
4 storage and transportation are generally referred to as dual-purpose casks and dual-purpose
5 canisters. Some vendors refer to their dual-purpose casks or canisters as “multipurpose”
6 canisters, which implies that it would be suitable for storage, transportation, and disposal.
7 However, in the absence of a repository program, there are no specifications for disposal
8 canisters and, therefore, no dual-purpose casks or canisters have been certified as
9 multipurpose (DOE 2012a).

10 There are 69 ISFSIs licensed to operate in 34 states. As of the beginning of 2012, ISFSIs were
11 storing spent fuel in over 1,700 loaded dry casks. Of the currently licensed ISFSIs, 54 are
12 operating under general licenses and 15 have specific licenses (NRC 2013b). Figure 2-2 shows
13 the locations of U.S. ISFSIs. Information on ISFSIs is presented in Appendix G of this draft
14 GEIS.

15 NRC authorizes construction and operation of ISFSIs by general and specific licenses. A
16 general license is created by regulation and confers the right upon the general licensee to
17 proceed with the licensed activity without further review or approval by the NRC. A specific
18 license, by contrast, requires an application to perform the licensed activity and NRC review and
19 approval by granting the license.

20 As these concepts apply to ISFSIs, every nuclear power reactor licensee holds a general
21 license, by virtue of 10 CFR Part 72, Subpart K, which authorizes storage of spent fuel in casks
22 whose design has been approved by the NRC. Licensees must evaluate the safety of using the
23 approved casks at the ISFSI for site-specific conditions, including man-made and natural
24 hazards, and must conform to all requirements under Subpart K for use of the approved design.
25 In addition, licensees must review their programs for operating the reactor (e.g., physical
26 security, radiation protection, or emergency planning) to determine if those programs are
27 affected by use of the casks and, if so, to seek approval from the NRC for any necessary
28 changes to those programs.

29 Further, a reactor licensee can seek a specific license to construct and operate an ISFSI, which
30 requires NRC’s review of the safety, environmental, and physical security aspects of the
31 proposed facility and the licensee’s financial qualifications. If the NRC concludes the proposed
32 ISFSI meets licensing criteria, the NRC grants the specific license. This license contains
33 various conditions (e.g., leak testing and monitoring) and specifies the quantity and type of
34 material the licensee is authorized to store at the site. A specific license runs for a term of up to
35 40 years and may be renewed ~~in accordance with all applicable requirements without limit for an~~
36 ~~additional 40 years (NRC 2012a).~~

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Generic Facility Descriptions and Activities

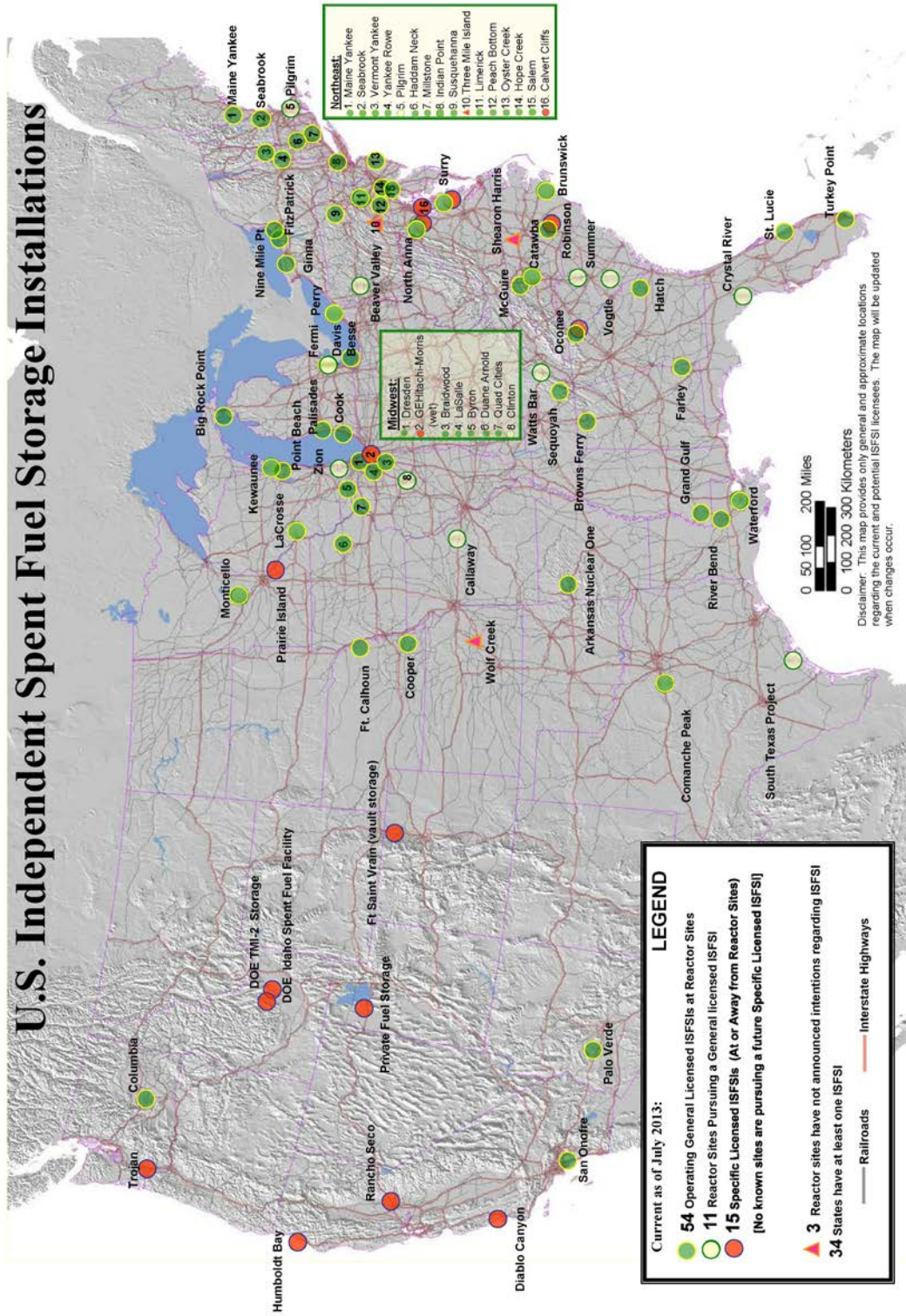


Figure 2-2. Licensed/Operating ISFSIs by State (Source: NRC 2013b)

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Generic Facility Descriptions and Activities

1 As described in more detail in Section 2.2.1, nuclear power plant licensees will undertake major
2 decommissioning activities during the 60 years following permanent cessation of reactor
3 operations. During major decommissioning activities, the licensees will transfer spent fuel from
4 spent fuel pools to either an at-reactor or away-from-reactor ISFSI. When the at-reactor ISFSI
5 is the only spent fuel storage structure left onsite, the facility is referred to as an “ISFSI-only
6 site.” Existing ISFSI-only sites include Big Rock Point, Haddam Neck, Fort St. Vrain, Maine
7 Yankee, Rancho Seco, Trojan, and Yankee Rowe.

8 The NRC requires licensees to develop spent fuel management plans that include specific
9 consideration of a plan for removal of spent fuel stored under a general license, and spent fuel
10 management before decommissioning systems and components needed for moving, unloading,
11 and shipping spent fuel (10 CFR 50.54(bb) and 72.218).⁷

12 Following the terrorist attacks on September 11, 2001, the NRC issued Orders to ISFSI
13 licensees to require certain compensatory measures. For example, on May 23, 2002, the NRC
14 issued an Order to the GEH Morris wet storage ISFSI (NRC 2002b). On October 16, 2002, the
15 NRC also issued Orders to specifically licensed and generally-licensed dry storage ISFSIs
16 (including those with near-term plans to store spent fuel in an ISFSI under a general license).
17 These Orders apply to prospective licensees. The details of these Orders are withheld from the
18 public for security reasons.

19 In addition to NRC licensing requirements, licensees may also be subject to individual State
20 requirements. For example, the State of Minnesota Public Utilities Commission requires an
21 applicant to receive a “certificate of need” prior to constructing an ISFSI.

22 Example of At-Reactor ISFSIs

23 Dry cask storage systems in use in the United States are summarized in Appendix G. Two
24 common systems are described below.

25 A common vertical dry cask storage system currently in use in at-reactor ISFSIs is Holtec
26 International’s HI-STORM 100. The HI-STORM cylindrical overpack is stored on an ISFSI pad
27 with its longitudinal axis in a vertical orientation. For example, its MPC-32 multipurpose canister
28 can hold up to 32 PWR fuel assemblies. Canisters are also available for BWR spent fuel. As a
29 result, dry storage of the entire 1,600 MTU of spent fuel generated by a typical reactor,
30 assuming all spent fuel is eventually transferred from the spent fuel pool, would require about
31 100 casks. Each storage cask is about 3.4 m (11 ft) wide and 6.1 m (20 ft) tall. The layout of
32 casks on an ISFSI pad is guided by operational considerations at each site. However, a
33 nominal layout involves casks separated by about 4.5 m (15 ft). Therefore, a typical ISFSI pad

⁷ The regulations reference “irradiated-fuel-management plans.” For the purposes of this discussion there is no difference between irradiated fuel and spent fuel.

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Generic Facility Descriptions and Activities

1 with 100 casks located inside a protected area common to the power plant, and arranged as
2 10 rows of 10 casks each, would cover about 46 × 46 m (150 × 150 ft). Therefore, the total area
3 of the ISFSI pad would be about 0.2 ha (0.5 ac) (Holtec 2000). For purposes of analysis in this
4 draft GEIS, the NRC assumes that an ISFSI of sufficient size to hold all spent fuel generated
5 during licensed life for operation is constructed during the reactor's licensed life for operation.

6 A common horizontal dry cask storage system currently in use in at-reactor ISFSIs is available
7 from Transnuclear, Inc., a wholly-owned subsidiary of AREVA North America. The NUHOMS
8 horizontal cask system uses dry shielded canisters that are placed in concrete horizontal
9 storage modules (HSMs). Among the NRC-approved canister designs is the NUHOMS-61BT
10 dry shielded canister. This canister can hold 61 BWR fuel assemblies. Canisters are also
11 available for PWR spent fuel. For a BWR, the HSM is about 6.0 m (20 ft) long, 4.6 m (15 ft)
12 high and 2.9 m (9.7 ft) wide. As a result, dry storage of 1,600 MTU of spent fuel generated by a
13 generic BWR, assuming all spent fuel is eventually transferred from the spent fuel pool to an
14 at-reactor ISFSI, would require about 150 HSMs. If HSMs were installed in rows and placed
15 back-to-back in 2 × 10 arrays, an ISFSI with 150 HSMs would require about 7 double module
16 rows and a single module row of 10 HSMs. Allowing for a 6-m- (20-ft-) wide concrete approach
17 slab on the entrance side of each HSM, a 150 HSM ISFSI site would be about 60 m (200 ft)
18 wide and 220 m (720 ft) long. Therefore, the total area of the horizontal ISFSI, including the
19 protected area, would be about 1.3 ha (3.6 ac).

20 **2.1.3 Away-from-Reactor ISFSIs**

21 Existing away-from-reactor ISFSIs include the GEH Morris wet storage facility in Morris, Illinois
22 and the DOE's Three Mile Island, Unit 2 Fuel Debris ISFSI at the Idaho National Engineering
23 Laboratory. Further, the NRC has issued a license to Private Fuel Storage, LLC (PFS) for an
24 away-from-reactor ISFSI, which would have been located on the reservation of the Skull Valley
25 Band of Goshute Indians (NRC 2004b).

26 A future away-from-reactor ISFSI could accept spent fuel from one or more nuclear power
27 plants. For purposes of this draft GEIS, the NRC assumes that the industry could develop an
28 away-from-reactor ISFSI that would store up to 40,000 MTU of spent fuel from various nuclear
29 power plant sites using existing technologies. Spent fuel would be moved from operating or
30 decommissioning reactor sites, or ISFSI-only sites, to an away-from-reactor ISFSI or ISFSIs,
31 and then from the away-from-reactor ISFSI to one or more permanent repositories. Aside from
32 the existing GEH Morris wet storage facility, the NRC assumes that, in the future, a portion of
33 the industry's spent fuel would be stored in one or more dry cask storage systems at an away-
34 from-reactor ISFSI.

35 In 2006, the NRC granted a license to PFS, to construct and operate an away-from-reactor
36 ISFSI in Skull Valley, Utah. PFS, a consortium of eight nuclear power utilities, proposed to
37 construct the site on the reservation of the Skull Valley Band of Goshute Indians, about 80 km

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Generic Facility Descriptions and Activities

1 (50 mi) southwest of Salt Lake City, Utah. The private fuel storage facility was intended for
2 temporary aboveground storage, using the Holtec HI-STORM dual-purpose canister-based cask
3 system, of up to 40,000 MTU of spent fuel from U.S. commercial nuclear power plants. PFS
4 proposed to build the ISFSI on a 330-ha (820-ac) site leased from the Skull Valley Band of
5 Goshute Indians. The site would be located in the northwest corner of the reservation
6 approximately 6 km (3.5 mi) from the Skull Valley Band's village. The proposed PFS ISFSI has
7 not been constructed. On December 20, 2012, PFS submitted a request to the NRC to
8 terminate its license (PFS 2012). Despite no immediate plans to construct the PFS facility,
9 issuance of the PFS license supports the assumption in this GEIS that an away-from-reactor
10 ISFSI is technically feasible and that the NRC can license an away-from-reactor storage facility.
11 Thus, the NRC's analysis of construction, operation, and decommissioning activities and
12 impacts for an away-from-reactor ISFSI in NUREG-1714 are reflected in this draft GEIS
13 (NRC 2001).

14 Consolidated Storage

15 On January 29, 2010, the President of the United States directed the Secretary of Energy to
16 establish a "Blue Ribbon Commission on America's Nuclear Future." The Blue Ribbon
17 Commission was tasked with conducting a comprehensive review of policies for managing the
18 back end of the nuclear fuel cycle and recommending a new strategy. The Blue Ribbon
19 Commission issued its findings and conclusions in January 2012. Among the findings and
20 conclusions related to continued storage of spent fuel was a strategy for prompt efforts to
21 develop one or more consolidated storage facilities.

22 In January 2013, DOE published its response to the Blue Ribbon Commission
23 recommendations titled, "Strategy for the Management and Disposal of Used Nuclear Fuel and
24 High-Level Radioactive Waste" (DOE 2013). This strategy implements a program over the next
25 10 years that, with congressional authorization, will:

- 26 • site, design, construct, license, and begin operation of a pilot interim storage facility by 2021
27 with an initial focus on accepting spent fuel from shutdown reactor sites
- 28 • advance toward the siting and licensing of a larger interim storage facility to be available by
29 2025 with sufficient capacity to provide flexibility in the waste-management system and
30 allow for acceptance of enough spent fuel to reduce expected government liabilities
- 31 • make demonstrable progress on the siting and characterization of repository sites to
32 facilitate the availability of a geologic repository by 2048

33 The Federal government's support for interim storage supports the NRC's decision to consider
34 this type of facility as one of the reasonably foreseeable interim solutions for spent fuel storage
35 pending ultimate disposal at a repository.

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1 **2.1.4 Dry Transfer System**

2 Although there are no dry transfer systems (DTSs) at U.S. nuclear power plant sites today, the
3 potential need for a DTS, or facility with equivalent capability, to enable retrieval of spent fuel
4 from ISFSIs for inspection or repackaging will increase as the duration and quantity of fuel in dry
5 storage increases. A DTS would enhance management of spent fuel inspection and
6 repackaging at all ISFSI sites and provide additional flexibility at all dry storage sites by enabling
7 repackaging without the need to return the spent fuel to a pool. A DTS would also help reduce
8 risks associated with unplanned events or unforeseen conditions and facilitate storage
9 reconfiguration to meet future storage, transport, or disposal requirements (Carlsen 2012).

10 Several DTS designs and related concepts have been put forward over the past few decades.
11 Among these designs is a design developed by Transnuclear, Inc. in the early 1990s under a
12 cooperative agreement between the DOE and the Electric Power Research Institute (EPRI).
13 Although the conceptual design was based on transferring spent fuel from a 30-ton 4-assembly
14 source cask to a 125-ton receiving cask, the DTS could be adapted to be suitable for any two
15 casks (Carlsen 2012).

16 On September 30, 1996, the DOE submitted to the NRC for review a topical safety analysis
17 report on the Transnuclear-EPRI DTS design (DOE 1996). In November 2000, the NRC issued
18 an assessment report in which it found the DTS concept has merit. The DOE, however, did not
19 request a license for the DTS (NRC 2000a).

20 The reference DTS considered in this draft GEIS is a two-level concrete and steel structure with
21 an attached single-level weather-resistant preengineered steel building. The concrete and steel
22 structure provides both confinement and shielding during fuel-transfer operations. The DTS
23 was designed to enable loading of one receiving cask in ten 24-hour days and unloading one
24 source cask in one 24-hour day.

25 The key facility parameters and characteristics described in the September 30, 1996 topical
26 safety analysis report are summarized below.

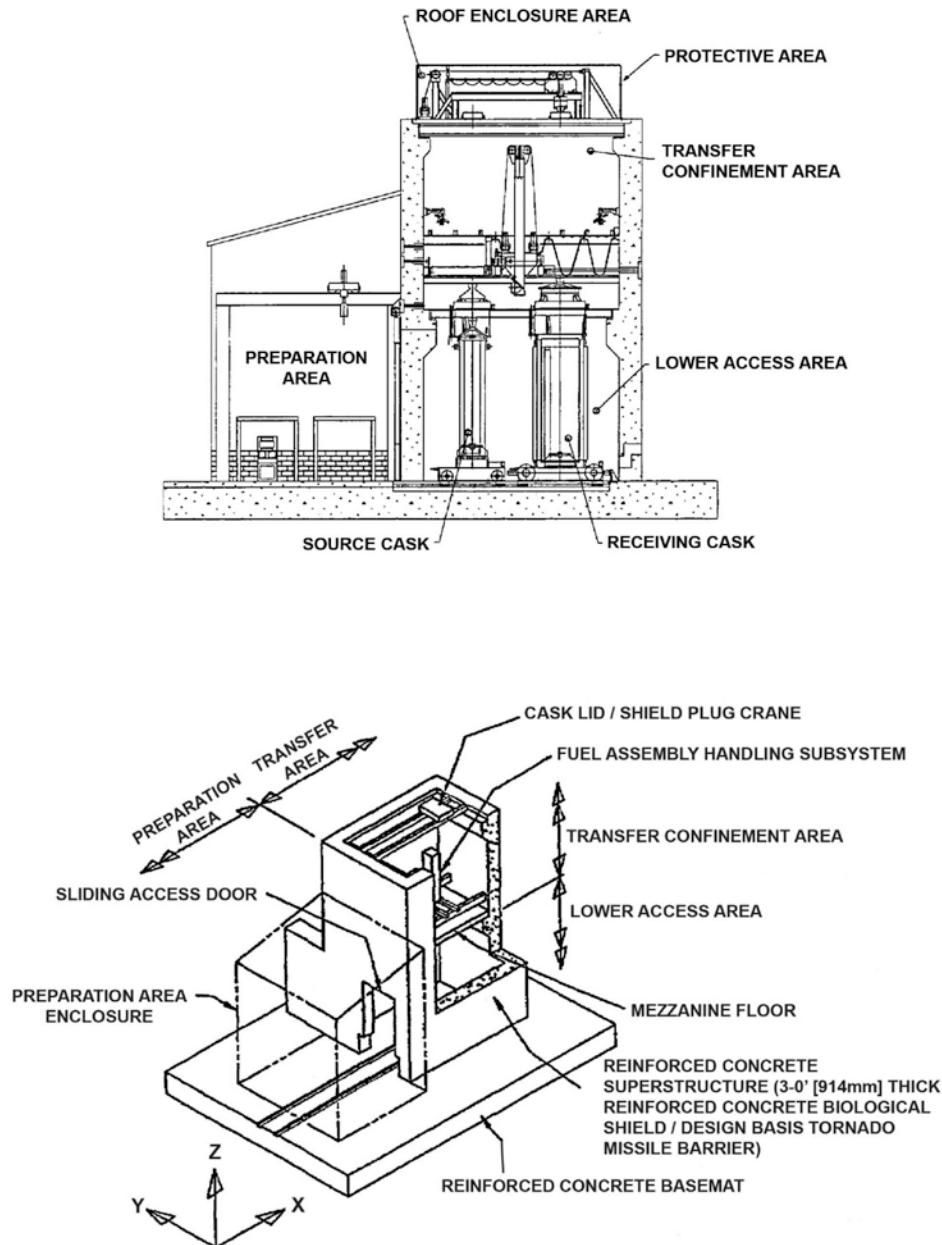
27 The reference DTS is a reinforced-concrete rectangular box structure with internal floor
28 dimensions of about 8 × 5.5 m (26 × 18 ft) and about 14 m (47 ft) tall. The system also includes
29 an attached, prefabricated, aluminum Butler-type building referred to as the preparation area
30 with dimensions of about 11.6 × 7.6 m (38 × 25 ft) wide and 11.6 m (38 ft) tall. The basemat for
31 the facility measures 14.9 × 21.9 m (49 × 72 ft), and the security zone would be about
32 76 × 91 m (250 × 300 ft) (i.e., less than 0.7 ha [2 ac]).

33 As shown in Figure 2-3, the preparation area is located at ground level of the DTS. The lower
34 access area is next to the preparation area and directly below the transfer confinement area.
35 The lower access area provides shielding, confinement, and positioning for the open source and

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Generic Facility Descriptions and Activities

- 1 receiving casks during spent fuel transfers. An 18- to 23-cm (7- to 9-in.)-thick steel sliding door
- 2 separates the lower access area from the preparation area. The transfer confinement area is
- 3 the upper level of the DTS, directly above the lower access area. The transfer confinement
- 4 area provides the physical confinement boundary and radiation shielding between spent fuel
- 5 and the environment.



6
7

Figure 2-3. Conceptual Sketches of a Dry Transfer System (DOE 1996)

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Generic Facility Descriptions and Activities

1 Transnuclear-EPRI found that radioactive waste generation could not be readily quantified, as it
2 depends strongly on reactor-specific conditions, primarily the crud levels on the fuel assemblies.
3 Table 6.1-1 of the topical safety analysis report showed the expected waste sources, including
4 decontamination wastes, spalled material in a crud catcher, and prefilters and high-efficiency
5 particulate air filters used in the heating ventilation and air conditioning system. Others wastes
6 considered included mechanical lubricants and precipitation runoff. The DTS does not rely on
7 water-supply lines. Water is brought to the facility in bottles and used for general purpose
8 cleaning only.

9 The reference DTS, if licensed, would have operated under the radiological protection
10 requirements of 10 CFR Part 20, "Standards for Protection Against Radiation." Occupational
11 doses for various tasks performed in the DTS are provided in Table 7.4-1 of the topical safety
12 analysis report (DOE 1996). Total estimated occupational doses from loading a single cask are
13 about 0.5 person-rem.

14 Maximum offsite doses reported in Table 7.6-1 of the topical safety analysis report were
15 estimated to range from 44 mrem per year at 100 m to 2 mrem per year at 500 m.

16 As with other facilities licensed under 10 CFR Part 72, the design events identified in
17 ANSI/ANS 57.9 (ANSI/ANS 1992) form the basis for the accident analyses performed for the
18 DTS. The bounding accident results for a distance of 100 m are a stuck fuel assembly
19 (47 mrem) and a loss-of-confinement barrier (721 mrem).

20 This draft GEIS considers the environmental impacts of constructing a reference DTS to provide
21 a complete picture of the environmental impacts of continued storage. This draft GEIS does not
22 license or approve construction or operation of a DTS. A separate licensing action would be
23 necessary before a licensee may construct and operate a site-specific DTS.

24 For the purposes of analysis in this draft GEIS, the NRC relies primarily on the facility
25 description of the Transnuclear-EPRI DTS described above. However, for some impact
26 assessments in this draft GEIS, the NRC has drawn from ~~to~~ the "Environmental Impact
27 Statement for the Proposed Idaho Spent Fuel Facility at the Idaho National Engineering and
28 Environmental Laboratory in Butte County, Idaho" (NRC 2004b). The NRC licensed the Idaho
29 Spent Fuel Facility in November 2004, but DOE has not constructed the facility. However, the
30 proposed facility has the capability to handle bare spent fuel for the purposes of repackaging
31 and storing spent fuel from Peach Bottom Unit 1~~;~~; the Shippingport Atomic Power Station~~;~~; and
32 various training, research, and isotope reactors built by General Atomics. Because the Idaho
33 Spent Fuel Facility, like the DTS, includes design features that allow bare fuel-handling
34 operations to repackage spent fuel from DOE transfer casks to new storage containers, the
35 NRC has concluded that some environmental impacts of the facility would be comparable to
36 those of a DTS.

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Generic Facility Descriptions and Activities

1 **2.2 Generic Activity Descriptions**

2 As described in Chapter 1, this draft GEIS analyzes environmental impacts of the continued
3 storage of spent fuel in terms of three timeframes: short-term, long-term, and indefinite storage.
4 As described below, the activities at spent fuel storage facilities during the short-term timeframe
5 coincide with nuclear power plant decommissioning activities. By the beginning of the long-term
6 timeframe, reactor licensees will have removed all spent fuel from the spent fuel pool and
7 decommissioned all remaining nuclear power plant structures. At that point, all spent fuel will be
8 stored in either an at-reactor or away-from-reactor ISFSI. During the long-term storage
9 timeframe, the NRC has conservatively assumed for the purpose of analysis in this draft GEIS,
10 that the need will arise for the transfer of spent fuel assemblies from aged dry cask storage
11 systems to newer systems of the same or newer design. In addition, the NRC assumes that
12 storage pads and modules would need to be replaced periodically.

13 **2.2.1 Short-Term Storage Activities**

14 As depicted in the generic timeline in Figure 2-4, after about 35 years of operation at low fuel
15 burnups, or about 46 years of high-burnup operation, the spent fuel pool at a typical reactor
16 reaches capacity and spent fuel must be removed from the pool to ensure full core offload
17 capability. The inventory of spent fuel that exceeds spent fuel pool capacity may be transferred
18 to dry cask storage at an at-reactor or away-from-reactor ISFSI. This draft GEIS focuses on the
19 activities and impacts associated with continued storage in a spent fuel pool and dry cask. This
20 section explains the activities that occur during short-term storage:

- 21 • decommissioning of the plant systems, structures, and components not required for
22 continued storage of spent fuel
- 23 • routine maintenance of the pool and ISFSI
- 24 • transfer of spent fuel from the pool to the at-reactor or away-from-reactor ISFSI

25 **2.2.1.1 Decommissioning Activities during Short-Term Storage**

26 A number of activities occur after a reactor licensee declares permanent cessation of operations.
27 These activities are divided into three phases: (1) initial activities; (2) major decommissioning
28 and storage activities; and (3) license-termination activities. The initial activities include the
29 licensee's certification to the NRC within 30 days of the decision or requirement to permanently
30 cease operations. This is followed by certification of permanent fuel removal from the reactor.
31 Within 2 years of permanent shutdown, the licensee is required to submit to the NRC a post-
32 shutdown decommissioning activities report that includes a description of planned
33 decommissioning activities along with a schedule, an estimate of expected costs, and a
34 discussion that provides the reasons for concluding that previously issued environmental impact
35 statements bound the site-specific decommissioning activities (NRC 2000b).

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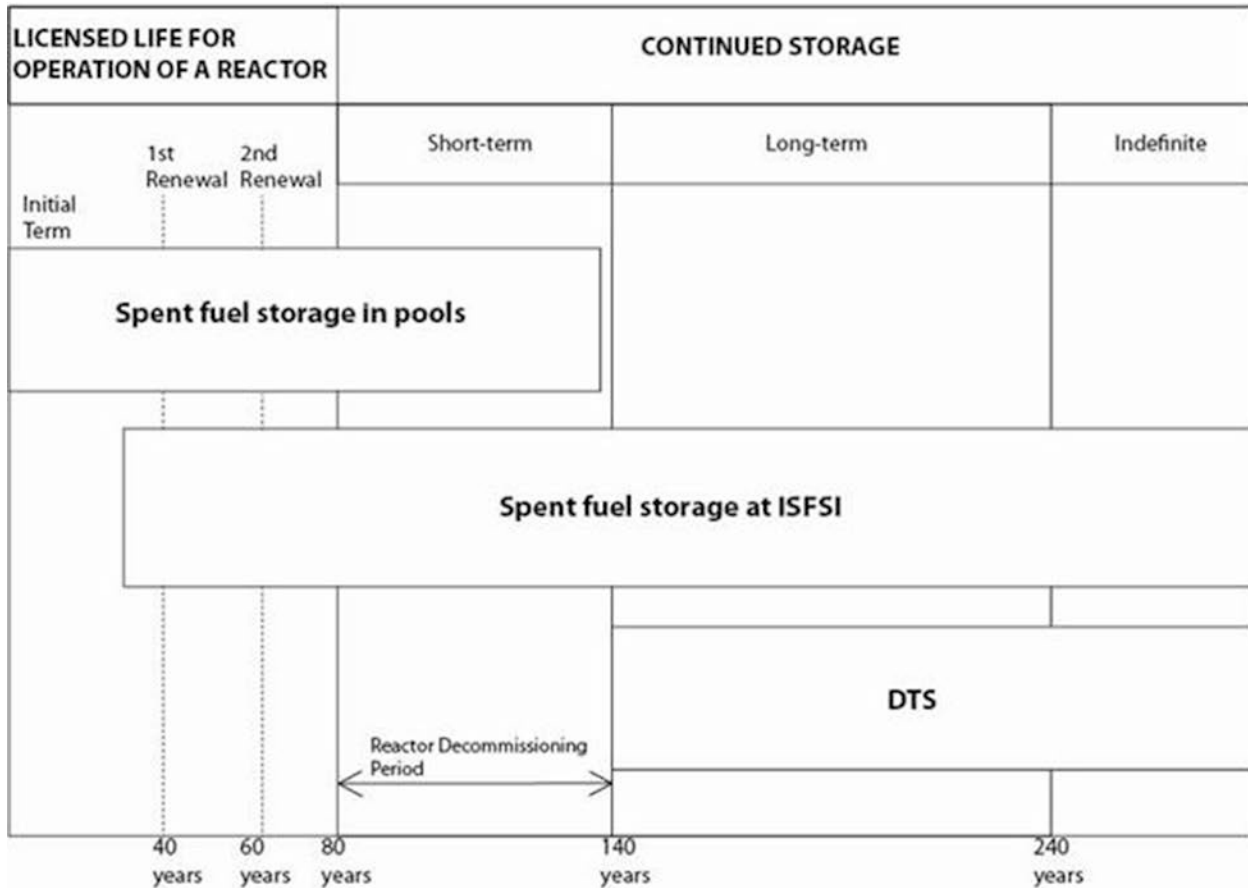


Figure 2-4. Continued Storage Timeline

Licensees may choose from three decommissioning options: DECON, SAFSTOR, and ENTOMB:

DECON: The equipment, structures, and portions of the facility and site that contain radioactive contaminants are promptly removed or decontaminated to a level that permits termination of the license shortly after cessation of operations.

SAFSTOR: The facility is placed in a safe, stable condition and maintained in that state (safe storage) until it is subsequently decontaminated and dismantled to levels that permit license termination. The implementation of SAFSTOR includes those activities necessary for the final decontamination and dismantlement of the facility. During SAFSTOR, a facility is left intact, but the fuel has been removed from the reactor vessel and radioactive liquids have been drained from systems and components and then processed. Radioactive decay

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1 occurs during the SAFSTOR period, thus reducing the quantity of contaminated
2 and radioactive material that must be disposed of during decontamination and
3 dismantlement.

4 ENTOMB: Radioactive structures, systems, and components are encased in a
5 structurally long-lived substance, such as concrete. The entombed structure is
6 appropriately maintained, and continued surveillance is carried out until the
7 radioactivity decays to a level that permits termination of the license⁸
8 (NRC 2000b).

9 The choice of decommissioning option is left to the licensee, but decommissioning must
10 conform to the NRC's regulations. This choice is communicated to the NRC and the public in
11 the post-shutdown decommissioning activities report. In addition, the licensee may choose to
12 combine the DECON and SAFSTOR options. For example, after power operations cease at a
13 facility, a licensee could use a short storage period for planning purposes, followed by removal
14 of large components (such as the steam generators, pressurizer, and reactor vessel internals),
15 place the facility in storage for 30 years, and eventually finish the decontamination and
16 dismantlement process (NRC 2000b).

17 Although the selection of the decommissioning option is up to the licensee, the NRC requires
18 the licensee to reevaluate its selection if the option (1) could not be completed as described,
19 (2) could not be completed within 60 years of the permanent cessation of plant operations,
20 (3) included activities that would endanger the health and safety of the public by being outside
21 of the NRC's health and safety regulations, or (4) would result in a significant impact to the
22 environment (NRC 2000b).

23 In accordance with the license-termination requirements for power reactors in
24 10 CFR 50.82(a)(3) and 52.110(c), decommissioning will be completed within 60 years of
25 permanent cessation of operations. Completion of decommissioning beyond 60 years will be
26 approved by the Commission only when necessary to protect public health and safety. Factors
27 that will be considered by the Commission include unavailability of waste disposal capacity and
28 other site-specific factors, including the presence of other nuclear facilities at the site. Given
29 this regulatory framework, it may be reasonably assumed that each nuclear power plant,
30 including its onsite spent fuel pool, will be decommissioned within 60 years of permanent
31 cessation of operations (NRC 2000b).

32 Licensees may begin major decommissioning activities 90 days after the NRC has received the
33 post-shutdown decommissioning activities report. "Major decommissioning activity" is defined in
34 10 CFR 50.2 and means, for a nuclear power reactor facility, any activity that results in

⁸ Because most power reactors will have radionuclides in concentrations exceeding the limits for unrestricted use even after 100 years, this option will generally not be feasible (NRC 2000b).

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1 permanent removal of major radioactive components, permanently modifies the structure of the
2 containment, or results in dismantling components for shipment containing greater than class C
3 waste in accordance with 10 CFR 61.55 (NRC 2000b). Finally, once decommissioning is
4 completed, and any spent fuel stored by the licensee is removed from the site, a licensee may
5 apply to the NRC to terminate its Part 50 license.⁹ A licensee is required to submit to the NRC a
6 license-termination plan as a supplement to its Final Safety Analysis Report at least 2 years
7 prior to the expected termination of the license as scheduled in the post-shutdown
8 decommissioning activities report (NRC 2000b).

9 **2.2.1.2 Activities in Spent Fuel Pools**

10 Spent fuel pools are cooled by continuously circulating water that cools the spent fuel
11 assemblies and provides shielding from radiation. During the short-term storage timeframe, the
12 pools will be used to store fuel until a licensee decides to remove the spent fuel as part of
13 implementing either the SAFSTOR or DECON decommissioning option. Beyond the
14 decommissioning period, the NRC assumes that all of the spent fuel has been transferred to a
15 dry cask storage system in an at-reactor or away-from-reactor ISFSI, as no other option
16 currently exists.

17 During the short-term storage timeframe, spent fuel in the pool continues to generate decay
18 heat from radioactive decay. The rate at which the decay heat is generated decreases the
19 longer the reactor has been shut down. Storing the spent fuel in a pool of water provides an
20 adequate heat sink for the removal of heat from the irradiated fuel. In addition, the fuel is
21 located under water so that the radiation emanating from the fuel is shielded by the water, thus
22 significantly limiting workers' exposure to radiation. After the spent fuel has cooled adequately,
23 it can be removed from the pool and stored in an ISFSI in air-cooled dry casks. At the earliest,
24 such as for low-burnup spent fuel, transfer of spent fuel to an ISFSI occurs after the fuel has
25 cooled for 5 years (NRC 2002a). Minimum cooling times for high-burnup fuel vary with burnup
26 and initial uranium enrichment for different dry cask storage systems, ranging from 5 to
27 >20 years.

28 Spent fuel pools are cooled by spent fuel pool cooling systems, which typically consist of pumps
29 to circulate cooling water through the system, a purification system of filters and a
30 demineralizer, and a heat exchanger (which transfers the heat from the spent fuel pool cooling
31 system to the service-water system or its equivalent). The operation of the purification system
32 generates some liquid low-level radioactive waste and some solid low-level radioactive waste in
33 the form of demineralizer resins. Some licensees opt to modify the existing spent fuel pool
34 support systems by installing self-contained spent fuel pool cooling and cleanup systems and
35 monitoring, controls and electrical power. These modifications effectively isolate the spent fuel

⁹ A licensee may terminate its Part 50 license earlier if the remaining spent fuel is stored under a specific license issued under 10 CFR Part 72.

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1 pool from the remainder of plant structures, systems and components, thereby creating a “spent
2 fuel pool island.” This approach allows decommissioning to begin on the remainder of the plant
3 while the spent fuel is safely stored (EPRI 2005). As described in Chapter 4 of this draft GEIS,
4 the operation of a new self-contained system would be bounded by the impacts of operating the
5 existing cooling system, which are also described in Chapter 4. The environmental impacts of
6 constructing a new spent fuel pool cooling system, which facilitates decommissioning activities,
7 is addressed in Chapter 6 of this draft GEIS.

8 For plants that enter SAFSTOR, the spent fuel pool will continue to be subject to preventative
9 and corrective maintenance, including maintenance of the structure, its security systems,
10 radiation protection and environmental monitoring programs, and processing of radioactive
11 waste that may be generated.

12 For purposes of analysis in this draft GEIS, the NRC assumes timely decommissioning of the
13 reactor in accordance with requirements in 10 CFR 50.82 and 52.110(c). As a result, all spent
14 fuel in storage in the spent fuel pool is assumed to be transported to a repository, if it is
15 available, or to either an at-reactor or away-from-reactor ISFSI within 60 years beyond the
16 licensed life for operation of the reactor.

17 **2.2.1.3 Activities at At-Reactor ISFSIs**

18 Operation and maintenance activities at an at-reactor ISFSI are focused on inspections,
19 monitoring, and training, and some limited physical and continuous electronic surveillance. The
20 staff that must be trained for ISFSI operations include staff for operations, maintenance, health
21 physics, and security personnel. A licensee will also maintain an emergency response plan for
22 ISFSI-related events.

23 In accordance with 10 CFR 72.42, the initial license term for an ISFSI must not exceed 40 years
24 and licenses may be renewed upon NRC approval for a period not to exceed 40 years. ISFSI
25 license renewal applications must include, among other things: (1) time-limited aging analyses
26 that demonstrate that structures, systems, and components important to safety will continue to
27 perform their intended safety function for the requested period of extended operation and (2) a
28 description of the aging management program for management of issues associated with aging
29 that could adversely affect structures, systems, and components important to safety. The NRC
30 reviews renewal applications using its recently issued “Standard Review Plan for Renewal of
31 Spent Fuel Dry Cask Storage System Licenses and Certificates of Compliance” (NRC 2011b).

32 The kinds of aging effects managed under an aging management program include, but are not
33 limited to: concrete cracking and spalling; loss of confinement; loss of material; and reduction in
34 heat transfer (e.g., by blocked air duct screens). The application of aging management
35 programs may include structure monitoring; monitoring of protective coating on carbon steel

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1 structures; ventilation surveillance; welded canister seal and leakage monitoring programs; and
2 bolted canister seal and leakage monitoring programs (DOE 2012b).

3 **2.2.1.4 Activities at Away-from-Reactor ISFSIs**

4 In assessing environmental impacts from construction and operation at an away-from-reactor
5 ISFSI, the NRC has drawn from the private fuel storage facility environmental impact statement
6 prepared by the NRC (NRC 2001). The proposed PFS facility was designed to store up to
7 40,000 MTU (44,000 tons of spent fuel) and was licensed to operate for 20 years. The NRC
8 now allows an initial license term of 40 years with 40-year renewal terms. While this draft GEIS
9 uses the general attributes of such a facility to assess likely impacts for purposes of this
10 analysis, it should be recognized that the environmental impacts of constructing and operating
11 an away-from-reactor ISFSI would be evaluated in more details in an environmental review
12 associated with a site-specific license application.

13 Based on the construction plans for the proposed private fuel storage facility, construction of the
14 away-from-reactor ISFSI would include construction of major buildings (e.g., administrative,
15 security, and maintenance) including a canister transfer building and installation of concrete
16 storage pads, batch plant, access and heavy haul roads, parking areas, and potentially new rail
17 lines. A peak workforce of approximately 250 workers would be expected (NRC 2001).
18 Groundwater wells could be installed for potable water use or aboveground storage tanks could
19 be erected for potable water and water for fires and the batch plant.

20 Should storage at an away-from-reactor ISFSI continue for such a time as bare fuel handling
21 would be required for inspection or maintenance, then a DTS could be constructed at the
22 facility.

23 Operation of the away-from-reactor ISFSI would include receiving, transferring, storage, and
24 repackaging of spent fuel. If a repository becomes available, operations could include the
25 transfer of spent fuel canisters to shipping casks and transportation to the repository.

26 Approximately 100 to 200 loaded shipping casks would be received at the postulated facility
27 each year (NRC 2001). The shipping casks would be brought into the canister transfer building
28 where the spent fuel would be transferred from the shipping cask to a storage cask. The
29 storage casks would then be placed on the concrete storage pads.

30 **2.2.2 Long-Term Storage Activities**

31 As described below, the new activities associated with long-term storage include continued
32 facility maintenance, construction and operation of a DTS, and storage facility replacement.
33 The maintenance activities during the long-term storage activities are the same as for the

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1 short-term, including any additional monitoring and inspections that may arise as part of
2 implementation of ongoing aging management programs.

3 **2.2.2.1 Construction and Operation of a DTS**

4 As described in Section 2.1.4, the NRC assumes a DTS, or its equivalent, would be used to
5 transfer fuel as needed for inspection or repackaging. For purposes of this draft GEIS, the NRC
6 assumes the reference DTS would be constructed, operated, and replaced once during the
7 long-term storage timeframe, and every 100 years thereafter. The reference DTS would occupy
8 about 0.04 ha (0.1 ac) and would have a total restricted access area of 0.7 ha (2 ac). The NRC
9 assumes that construction of a reference DTS would take 1 to 2 years.

10 DOE has described the operation of a reference DTS in the “Dry Transfer System Topical
11 Safety Analysis Report” (DOE 1996). A summary is provided here to illustrate the process of
12 spent fuel repackaging.

13 The reference DTS includes three major areas:

- 14 • preparation area
- 15 • lower access area
- 16 • transfer confinement area

17 As shown in Figure 2-3, receiving casks and source casks enter the preparation area and exit
18 the DTS on rail-mounted trolleys. To begin spent fuel transfer operations, a receiving cask (i.e.,
19 the cask *into* which fuel will be transferred) is transported to the DTS. The receiving cask is
20 positioned and loaded on a receiving cask transfer trolley at the DTS and rolled into the
21 preparation area. Next, the receiving cask lid and outer and inner canister lids are removed.
22 Finally, the receiving cask is moved into the lower access area and mated to the transfer
23 confinement area.

24 A source cask (i.e., the cask *from* which fuel will be transferred) follows a similar path as the
25 receiving cask into the lower access area and is mated to the transfer confinement area. No
26 personnel are present in the lower access area for the transfer operations; all transfer
27 operations are controlled remotely. The lids on both the receiving cask and source cask are
28 removed to prepare for spent fuel transfer. The fuel-assembly-handling subsystem in the
29 transfer confinement area is used to grab and lift a spent fuel assembly from the source cask.
30 The spent fuel assembly is lifted inside a transfer tube and then moved over an empty position
31 in the receiving cask. The spent fuel assembly is lowered into the receiving cask and detached
32 from the lifting device. When spent fuel transfers are complete, both casks are closed,
33 detached from the transfer confinement area, and ultimately removed from the lower access
34 area back to the preparation area.

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1 Maintenance and monitoring activities at the DTS would include routine inspections and testing
2 of the spent fuel and cask transfer and handling equipment (e.g., lift platforms and associated
3 mechanical equipment) and process and effluent radiation monitoring.

4 **2.2.2.2 Replacement of Storage and Handling Facilities**

5 For purposes of analysis in this draft GEIS, the NRC assumes that storage facilities will require
6 complete replacement over the 100-year long-term storage timeframe. Replacement activities
7 are assumed to occur as needed throughout the 100-year long-term storage timeframe, but not
8 all at once over a relatively short interval (e.g., 2 years). Replacement activities include the
9 following:

- 10 • construction of a new ISFSI pads adjacent to, or nearby, the initial pads
- 11 • construction of replacement storage casks or HSMs
- 12 • movement of canisters in good condition to new casks or HSMs
- 13 • use of the initial and replacement DTS to transfer fuel to new canisters and casks, as
14 necessary
- 15 • replacement of the DTS

16 **2.2.3 Indefinite Storage Activities**

17 Should a repository not become available within the long-term storage timeframe, then activities
18 described for the long-term storage timeframe in Section 2.2.2 are assumed to continue
19 indefinitely. For purposes of analysis in this draft GEIS, the NRC assumes that storage facilities
20 (i.e., an ISFSI and its associated DTS) would be replaced once every 100 years.

21 **2.3 References**

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24 10 CFR Part 50. *Code of Federal Regulations*, Title 10, *Energy*, Part 50, “Domestic Licensing of
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26 10 CFR Part 52. *Code of Federal Regulations*, Title 10, *Energy*, Part 52, “Licenses,
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28 10 CFR Part 61. *Code of Federal Regulations*, Title 10, *Energy*, Part 61, “Licensing
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3.0 Affected Environment

2 For purposes of the evaluation in this draft *Waste Confidence Generic Environmental Impact*
3 *Statement* (draft GEIS), the *affected environment* is the environment that exists at and around
4 the facilities that store spent nuclear fuel (spent fuel) after the end of a reactor's licensed life for
5 operation. Spent fuel is stored in at-reactor spent fuel pools and independent spent fuel storage
6 installations (ISFSIs). Where appropriate, this chapter will discuss the environmental impacts
7 during reactor operations to establish the baseline affected environment at the beginning of
8 continued storage.

9 The affected environment and potential impacts of continued storage at an away-from-reactor
10 ISFSI are discussed in Chapter 5 and are not addressed further in this chapter. Because
11 conditions at at-reactor ISFSIs are at least partially the result of past construction and
12 operations at power plants, the impacts of these past and ongoing operations and how
13 they have shaped the environment help to establish the baseline affected environment.
14 A comprehensive description of the affected environment during operations is provided in the
15 *Generic Environmental Impact Statement for License Renewal of Nuclear Plants* (License
16 Renewal GEIS) (NRC 2013a) and the analysis in this draft GEIS relies on that description to
17 help establish the affected environment for continued storage. Sections 3.1 through 3.16
18 provide a general description of the affected at-reactor environment for each resource area.
19 Descriptions of the typical facilities and activities that occur during continued storage are
20 described in Chapter 2. The potential environmental impacts of continued storage at reactor
21 sites are evaluated in Chapter 4.

22 3.1 Land Use

23 This section describes the affected environment in terms of land use associated with continued
24 storage of spent fuel.

25 The general characteristics of nuclear power plants are described in Section 2.1.1 of this draft
26 GEIS. Operating commercial nuclear power plant sites range in area from 34 ha (84 ac) to
27 5,700 ha (14,000 ac) (NRC 2013a). Nuclear power plant sites are zoned for industrial use with
28 land requirements generally amounting to 40 to 50 ha (100 to 125 ac) for the reactor
29 containment building, auxiliary buildings, cooling system structures, administration and training
30 offices, and other facilities (e.g., switchyards, security facilities, and parking lots). Areas
31 disturbed during construction of the power plant generally were returned to prior uses when
32 construction was completed. Other land commitments include transmission line right-of-ways
33 and cooling lakes (if used) (NRC 2013a).

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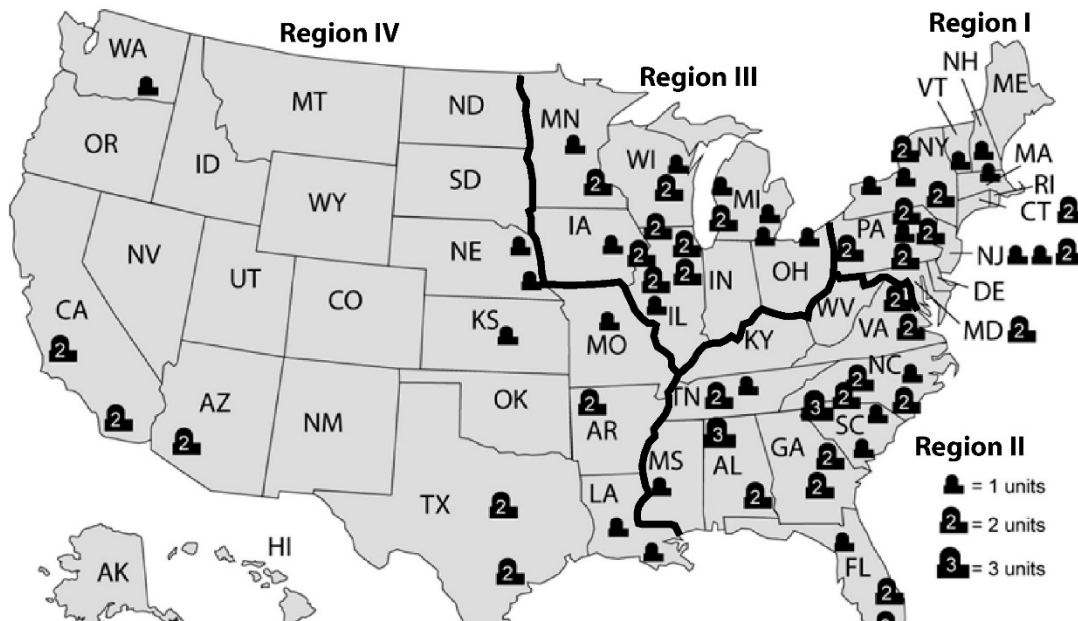
Affected Environment

1 As described in the License Renewal GEIS (NRC 2013a), areas surrounding nuclear power
2 plant sites typically consist of flat to rolling countryside in wooded or agricultural areas.
3 Information on land cover within 8 km (5 mi) of commercial nuclear power plants is summarized
4 in Table 3.2–1 of the License Renewal GEIS (NRC 2013a). Most of the land cover near plants
5 is undeveloped land (forest, wetlands, herbaceous cover, and shrub/scrub land), agricultural
6 land, or open water. U.S. Nuclear Regulatory Commission (NRC) regions and the location of
7 operating reactors within the United States are shown in Figure 3-1. In Region I (Northeast) and
8 Region II (Southeast), more than 80 percent of land cover surrounding most plants is open
9 water, forest, wetlands, and agricultural. Power plants in Region III (northern Midwest) are
10 mostly surrounded (approximately 80 percent) by agricultural land, open water, and forests. In
11 Region IV (West and southern Midwest), more than 90 percent of land cover surrounding most
12 plants is agricultural land, shrub/scrub land, open water, forest, herbaceous cover, and wetlands
13 (NRC 2013a).

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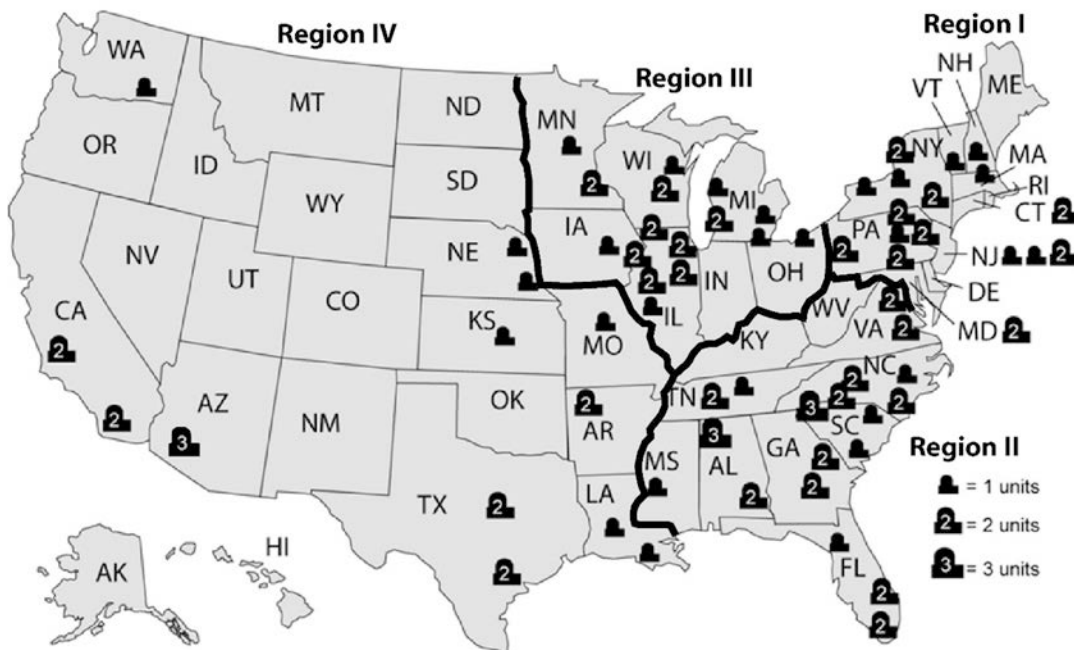
Affected Environment

U.S. Operating Commercial Nuclear Power Reactors



1

U.S. Operating Commercial Nuclear Power Reactors



2

3

Figure 3-1. Map of NRC Regions Showing Locations of Operating Reactors (NRC 2012a)

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1
2 Nuclear power plants and their at-reactor ISFSIs are located in a range of political jurisdictions
3 including towns, townships, service districts, counties, parishes, and states. The distances of
4 plants from metropolitan and residential areas vary among sites. Most sites are not very remote
5 (i.e., they are not more than about 32 km [20 mi] from a community of 25,000 people or 80 km
6 [50 mi] from a community of 100,000 people). State, Federal, and Native American lands are
7 present to various extents within the 80-km (50-mi) radius of power plants (NRC 2013a).

8 During the period from 1960 to 1980, with utilities and local government actively encouraging
9 growth (Metz 1983), commercial and industrial land uses tended to expand within the 16-km
10 (10-mi) radius around nuclear power plants at the expense of agriculture (NRC 2013a). In some
11 instances, the roads and water lines built for plant purposes encouraged residential and
12 industrial growth. As described in Section 2.1, the distance of the nearest resident to a nuclear
13 power plant and ISFSI is typically about 0.4 km (0.25 mi). Recently, local jurisdictions have
14 adopted comprehensive land use or master plans to control residential and commercial growth
15 and preserve agricultural land around nuclear power plants (NRC 2013a).

16 Commercial nuclear power plant sites are owned and maintained by investor-owned utilities or
17 merchant generators (i.e., independent power producers) that operate the associated power
18 plants. While many plant owners use the land solely for generating electricity, some owners
19 allow other uses for the land. Some plant owners lease land for agricultural (farming) and
20 forestry production, permit cemetery and historical site access, and designate portions of their
21 sites for recreation, management of natural areas, and wildlife conservation. As a result of
22 security concerns after September 11, 2001, licensees have implemented improved site security
23 measures, such as upgraded fencing, reduced site access, and increased signage detailing site
24 access and restrictions (NRC 2013a).

25 Spent fuel pools are housed in shield buildings at nuclear power plants with boiling water
26 reactors or in fuel buildings at plants with pressurized water reactors (NRC 2013a). Continued
27 storage in spent fuel pools would require only the building housing the spent fuel pool and any
28 cooling system infrastructure that keeps the spent fuel cool. Land requirements for spent fuel
29 pools are small in comparison to the total nuclear power plant site area.

30 At most operating nuclear power plants, at-reactor ISFSIs have been constructed to provide
31 increased spent fuel storage because the spent fuel pools have reached capacity. The majority
32 of ISFSIs are located at licensed nuclear power plant sites. Currently, there are 69 ISFSIs
33 licensed to operate in 34 states. Of these ISFSIs, 54 operate under a general license at reactor
34 sites and 15 received NRC-issued, site-specific licenses at either reactor sites or at away-from-
35 reactor sites (NRC 2013b).

36 Land requirements for at-reactor ISFSIs (either at operating or decommissioned power plants)
37 are small in comparison to the total power plant site area. Spent fuel storage under either a

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1 general license or a site-specific license at an operating reactor consists of the casks, a cask
2 transfer system (i.e., cranes and mobile equipment necessary to move the casks), and
3 reinforced concrete pads on which the casks are placed (NRC 1989). Table 3-1 provides
4 comparisons of land area needed for ISFSIs at various nuclear power plants in contrast to the
5 total land area of power plant sites.

6 **Table 3-1.** Land Area Characteristics of Operating Nuclear Power Plants with Site-Specific
7 ISFSI Licenses

Plant	Total Site Area ha (ac)	Land Area Developed for ISFSI ha (ac)	Land Area of Concrete Pad(s) ha (ac)
Calvert Cliffs	843 (2,108)	2.4 (6)	0.2 (0.5)
Diablo Canyon	304 (760)	1.6–2 (4–5)	0.48 (1.2)
Surry	336 (840)	6 (15)	0.2 (0.5)
H.B. Robinson	2,408 (6,020)	0.06 (0.15)	0.06 (0.04)
North Anna	721 (1,803)	4 (10)	0.2 (0.5)
Oconee	204 (510)	1.2 (3)	0.16 (0.4)
Prairie Island	224 (560)	4 (10)	0.16 (0.4)

Sources: NRC 2012b; 2009a; 2008; 2005a,b; 2003; 1992

8 **3.2 Socioeconomics**

9 This section describes the general socioeconomic factors that could be directly or indirectly
10 affected by continued storage. For the draft GEIS, the NRC assumes that all nuclear power
11 plant sites have constructed at-reactor ISFSIs by the end of a reactor's licensed life for
12 operation. Further, by this time, the socioeconomic effects of reactor operations have become
13 well established because regional socioeconomic conditions will have adjusted to the presence
14 of the nuclear power plant. During the period of reactor operations, local communities will have
15 adjusted to fluctuations in workforce caused by regularly scheduled refueling and maintenance
16 outages. Changes in employment and tax payments caused by the transition from reactor
17 operations to decommissioning, and the continued storage of spent fuel, can have a direct and
18 indirect effect on public services and housing demand, as well as traffic volumes in the region
19 around each nuclear power plant site.

20 In general, nuclear power plant sites in the United States are located in one of two broad
21 regional economic settings: rural or semi-urban. Rural areas have relatively simple economies
22 in which agriculture is the primary economic activity (NRC 2013a). Rural economies have
23 smaller, less diversified labor markets that are often composed of lower-paying occupations
24 requiring less skill (NRC 2013a). Examples of nuclear power plant sites located in rural
25 environments include Diablo Canyon, Grand Gulf, Oconee, Peach Bottom, Susquehanna, Three
26 Mile Island, and Wolf Creek. Semi-urban areas have more complex economic structures,

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1 containing a wider range of industries, with larger and more diverse labor markets (NRC 2013a).
2 Examples of power plant sites in semi-urban areas include Indian Point, Limerick, Millstone, and
3 Palo Verde.

4 For the purposes of this draft GEIS, the socioeconomic region of influence is defined by where
5 spent fuel storage workers and their families reside, spend their income, and use their benefits,
6 thereby directly and indirectly affecting the economic conditions of the region. Local and
7 regional communities provide the people, goods, and services needed to support spent fuel
8 storage operations. Spent fuel storage operations, in turn, provide wages and benefits for
9 people and dollar expenditures for goods and services.

10 Currently, there are 69 ISFSIs licensed to operate in 34 states (NRC 2013b). NRC has
11 prepared several environmental assessments (EAs) for constructing and operating at-reactor
12 ISFSIs. A review of these EAs found that the construction workforce for an ISFSI ranged from
13 approximately 20 to 60 workers for approximately 1 year (NRC 2003; 2005b,c; 1991a). In most
14 cases, the construction workforce was comprised of locally available construction workers and
15 existing power plant operations and security personnel. Since most at-reactor ISFSIs were
16 constructed during the licensed life of the reactor (including renewed license periods), most
17 reactor licensees added a small number of additional workers (less than three) to support ISFSI
18 operations (NRC 1988, 1985, 1991b). No additional workers were required to maintain or
19 monitor continued ISFSI operations for license renewal (NRC 2005a,b; 2009a; 1991a; 2012b).

20 As a nuclear power plant transitions to decommissioning and continued storage, the staffing
21 requirement decreases. Compared to nuclear power plant operations which requires 600 to
22 2,400 workers, and decommissioning which requires 100 to 200 workers, continued storage at
23 spent fuel pool and at-reactor ISFSI requires far fewer workers, which will likely range from 20 to
24 85 workers, depending on the continued storage activity at any given time. As discussed in
25 Chapter 1 of this draft GEIS, the environmental impacts of decommissioning are not considered
26 to be part of continued storage.

27 **3.2.1 Employment and Income**

28 Regional socioeconomic conditions associated with continued storage can vary depending on
29 the location of the at-reactor storage site and the size of the storage workforce. Impacts
30 associated with reactor shutdown and decommissioning are discussed with respect to
31 cumulative impacts in Chapter 6 of this draft GEIS. Some systems that were used during
32 reactor operations would remain in operation to ensure spent fuel pool cooling prior to the
33 transfer of spent fuel from the pool to an at-reactor ISFSI. During continued storage, a reduced
34 workforce would maintain and monitor the spent fuel pool and ISFSI. Workforce numbers would
35 vary from site to site. At GEH Morris, an away-from-reactor spent fuel pool storage facility;
36 fewer than 20 full-time employees monitor and maintain the spent fuel at the site (NRC 2004).
37 In 2005, the Electric Power Research Institute and Maine Yankee Atomic Power Company

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1 prepared a report that provides detailed information on the decommissioning of Maine Yankee
2 Atomic Power Station (EPRI and Maine Yankee 2005). At Maine Yankee (EPRI and Maine
3 Yankee 2005), approximately 85 workers completed fuel transfer from the spent fuel pool to the
4 at-reactor ISFSI. After fuel transfer was completed, overall staffing at Maine Yankee was
5 reduced further (EPRI and Maine Yankee 2005). Currently, Maine Yankee maintains a staff of
6

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1 30 to 35 workers, which consist of operations and security personnel (MYAPC 2013). In
2 contrast, at Fort St. Vrain, the applicant estimated that a minimal staff of 10 workers was
3 needed for ISFSI operations (NRC 1991a).

4 **3.2.2 Taxes**

5 Tax payments to local communities vary widely and the magnitude of tax payments depends on
6 a number of factors including the state tax laws and established tax payment agreements with
7 local tax authorities. These tax payments, whether occurring in rural or semi-urban areas,
8 provide support for public services at the local level (NRC 2013a). After termination of reactor
9 operations, property tax payments would continue to provide revenue, albeit at a reduced rate,
10 for State and local governments to spend on education, public safety, local government
11 services, and transportation. For example during plant operations, Maine Yankee paid
12 approximately \$12 million a year to the Town of Wiscasset. Following plant shutdown, the town
13 initially agreed to a reduction in taxes to approximately \$6.1 million. Then, subsequent 2-year
14 agreements were reached, and the annual tax liability was reduced to approximately \$1 million
15 (EPRI and Maine Yankee 2005). For the 2012–2013 tax year, Maine Yankee paid
16 approximately \$1,003,000 in property taxes and fees (MYAPC 2013). Portland General Electric,
17 the licensee for the decommissioned Trojan site, which stopped electrical generation in
18 November 1992, has maintained an at-reactor ISFSI and paid \$1,075,228.77 in property taxes
19 for the 2012 tax year (Columbia County 2013). Pacific Gas and Electric, the licensee for
20 Humboldt Bay, which shutdown in July 1976, and has maintained an at-reactor spent fuel pool
21 paid \$1,951,266 in property taxes to Humboldt County for the 2012–2013 tax year (PG&E
22 2012). Connecticut Yankee Atomic Power Company, the licensee for Haddam Neck that
23 shutdown in December 1996, paid approximately \$1,200,000 in property taxes for the 2012 tax
24 year to the town of Haddam (CYAPC 2012).

25 **3.2.3 Demography**

26 Nuclear power plants sites and their associated spent fuel pools and at-reactor ISFSIs are
27 located in a range of political jurisdictions (e.g., towns, townships, service districts, counties,
28 parishes, Native American lands, and states). More than 50 percent of the sites have a
29 population density within an 80-km (50-mi) radius of fewer than 77 people/km² (200 people/mi²).
30 In general, the nearest resident nuclear power plant is typically about 0.4 km (0.25 mi) (NRC
31 2013a). Demographic characteristics vary in the region around each nuclear power plant site
32 and may be affected by the remoteness of the nuclear plant to regional population centers
33 (NRC 2013a).

34 Many communities have transient populations associated with regional tourist and recreational
35 activities, weekend and summer homes, or populations of students who attend regional colleges
36 and other educational institutions. For example, nuclear power plant sites located in coastal
37 regions, such as D.C. Cook and Palisades on Lake Michigan, Oyster Creek on the New Jersey

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1 shore north of Atlantic City, and Diablo Canyon north of Avila Beach, have summer, weekend,
2 and retirement populations and a range of recreational and environmental amenities that attract
3 visitors from nearby metropolitan population centers (NRC 2013a). The regions around
4 Vermont Yankee and Diablo Canyon power stations attract visitors seeking outdoor recreational
5 activities for camping, skiing, and hiking in nearby state parks (NRC 2013a, 2003).

6 In addition to transient populations, farms and factories in rural communities often employ
7 migrant workers on a seasonal basis. For example, berry production near the D.C. Cook and
8 Palisades Nuclear Plants is a local agricultural activity that employs a sizable migrant labor
9 force in the summer (NRC 2013a).

10 **3.2.4 Housing**

11 Housing markets in the vicinities of nuclear power plant sites and the spent fuel pools and
12 at-reactor ISFSIs associated with the power plants vary considerably, with wide ranges in the
13 number of housing units, vacancy rates, and the type and quality of housing (NRC 2013a).
14 Although housing demand may be temporarily affected by the number of workers employed at
15 a nuclear power plant site (NRC 2013a), actual housing choices are not likely to be affected by
16 the presence of a nuclear power plant or construction or operation of an at-reactor ISFSI
17 (NRC 2002). Rather, housing demand and choices are more likely to be in response to housing
18 prices and commutes to a nearby urban area (NRC 2002). Nuclear power plants located in
19 rural communities have relatively small housing markets (i.e., low housing availability), stable
20 housing prices, lower median house values, and moderate and stable vacancy rates. In semi-
21 urban regions, housing markets are likely to change more rapidly with population growth near
22 metropolitan areas (NRC 2013a).

23 **3.2.5 Public Services**

24 Licensees of nuclear power plant sites pay taxes to local and State governments. Revenues
25 from these tax payments support public services at local levels (NRC 2013a). Changes in
26 employment and tax payments caused by the transition from reactor operations to
27 decommissioning and continued storage can have a direct and indirect effect on public services
28 in the region around each nuclear power plant site. Although the most important source of
29 revenue for local communities are property taxes, other sources of revenue include levies of
30 electricity output and direct funding for local educational facilities and programs. As discussed
31 in Section 3.2.2, after termination of reactor operations, property tax payments would continue
32 to provide revenue, albeit at a reduced rate, for State and local governments to spend on public
33 services (e.g., education, public safety, local government services, and transportation).

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1 3.2.6 Transportation

2 Local and regional transportation networks and traffic volumes in the vicinity of nuclear power
3 plant sites and associated spent fuel pools and at-reactor ISFSIs associated with the power
4 plants vary considerably depending on the regional population density, location, size of local
5 communities, and the nature of economic development patterns (NRC 2013a). For continued
6 storage, it is anticipated that roadways used during plant operations would continue to be used
7 for access to the ISFSI after reactor ceases operation. In both rural and semi-rural locations
8 most sites have only one access road, which may experience congestion at peak travel times
9 (NRC 2013a). For further information on transportation networks see Section 3.12.

10 3.3 Environmental Justice

11 This section describes the affected environment in the vicinity of at-reactor spent fuel storage
12 sites with respect to environmental justice factors that could occur during continued storage.

13 The environmental justice analysis assesses
14 the potential for disproportionately high and
15 adverse human health or environmental effects
16 on minority and low-income populations that
17 could result from continued storage.

18 Under Executive Order 12898 (59 FR 7629),
19 Federal agencies are responsible for
20 identifying and addressing potential
21 disproportionately high and adverse human
22 health and environmental impacts on minority
23 and low-income populations. Environmental
24 justice refers to a Federal policy implemented
25 to ensure that minority, low-income, and tribal
26 communities historically excluded from
27 environmental decision-making are given
28 equal opportunities to participate in decision-
29 making processes. In 2004, the Commission issued a Policy Statement on the Treatment of
30 Environmental Justice Matters in NRC Regulatory and Licensing Actions (69 FR 52040), which
31 states “The Commission is committed to the general goals set forth in Executive Order 12898,
32 and strives to meet those goals as part of its National Environmental Policy Act (NEPA) review
33 process” (NRC 2013a).

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations

“Each federal agency, whenever practicable and appropriate, shall collect, maintain, and analyze information assessing and comparing environmental and human health risks borne by populations identified by race, national origin, or income. To the extent practical and appropriate, Federal agencies shall use this information to determine whether their programs, policies, and activities have disproportionately high and adverse human health or environmental effects on minority populations and low-income populations” (59 FR 7629).

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- 1 The Council of Environmental Quality (CEQ) provides the following definitions to consider when
2 conducting environmental justice reviews within the framework of NEPA, in “Environmental
3 Justice: Guidance under the National Environmental Policy Act” (CEQ 1997):
- 4 • **Disproportionately High and Adverse Human Health Effects**—Adverse health effects are
5 measured in risks and rates that could result in latent cancer fatalities, as well as other fatal
6 or nonfatal adverse impacts on human health. Adverse health effects may include bodily
7 impairment, infirmity, illness, or death. Disproportionately high and adverse human health
8 effects occur when the risk or rate of exposure to an environmental hazard for a minority or
9 low-income population is significant (as employed by NEPA) and appreciably exceeds the
10 risk or exposure rate for the general population or for another appropriate comparison
11 group.
 - 12 • **Disproportionately High and Adverse Environmental Effects**—A disproportionately high
13 environmental impact that is significant (as employed by NEPA) refers to an impact or risk of
14 an impact on the natural or physical environment in a low-income or minority community that
15 appreciably exceeds the environmental impact on the larger community. Such effects may
16 include ecological, cultural, human health, economic, or social impacts. An adverse
17 environmental impact is an impact that is determined to be both harmful and significant (as
18 employed by NEPA). In assessing cultural and aesthetic environmental impacts, impacts
19 that uniquely affect geographically dislocated or dispersed minority or low-income
20 populations or American Indian tribes are considered.
 - 21 • **Minority individuals**—Individuals who identify themselves as members of the following
22 population groups: Hispanic or Latino, American Indian or Alaska Native, Asian, Black or
23 African American, Native Hawaiian or Other Pacific Islander, or two or more races meaning
24 individuals who identified themselves on a Census form as being a member of two or more
25 races, for example, Hispanic and Asian.
 - 26 • **Minority populations**—Minority populations are identified when (1) the minority population
27 of an affected area exceeds 50 percent or (2) the minority population percentage of the
28 affected area is meaningfully greater than the minority population percentage in the general
29 population or other appropriate unit of geographic analysis. Minority populations may be
30 communities of individuals living in close geographic proximity to one another, or they may
31 be a geographically dispersed or transient set of individuals, such as migrant workers or
32 American Indians, who, as a group, experience common conditions with regard to
33 environmental exposure or environmental effects. The appropriate geographic unit of
34 analysis may be a political jurisdiction, county, region, or State, or some other similar unit
35 that is chosen so as not to artificially dilute or inflate the affected minority population.
 - 36 • **Low-income population**—Low-income population is defined as individuals or families
37 living below the poverty level as defined by the U.S. Census Bureau’s Current Population
38 Reports, Series P–60 on Income and Poverty (USCB 2007). Low-income populations may
39

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1 be communities of individuals living in close geographic proximity to one another, or they
2 may be a set of individuals, such as migrant workers, who, as a group, experience common
3 conditions.

4 Consistent with the NRC's Policy Statement (69 FR 52040), affected populations are defined as
5 minority and low-income populations who reside within an 80-km (50-mi) radius of a nuclear
6 power plant site. Data on low-income and minority individuals are usually collected and
7 analyzed at the census tract or census block group level (NRC 2013a).

8 For the continued storage of spent fuel, the NRC will comply with Executive Order 12898
9 through implementation of its NEPA requirements in Title 10 of the *Code of Federal Regulations*
10 (CFR) Part 51 by considering impacts to minority and low-income populations in this draft GEIS.
11 It should be noted, however, that the Waste Confidence rulemaking is not a licensing action; it
12 does not authorize the initial or continued operation of any nuclear power plant, and it does not
13 authorize storage of spent fuel. Neither this rulemaking nor this draft GEIS identify specific sites
14 for NRC licensing actions that would trigger a site-specific assessment.

15 This draft GEIS describes the potential impacts to minority and low-income populations
16 associated with continued storage of spent fuel at both at- and away-from-reactor ISFSIs. In
17 this regard, the NRC has determined that it can provide an assessment of the environmental
18 justice impacts during continued storage as compared to environmental justice impacts of
19 storage during reactor operations.

20 For site-specific licensing actions, the NRC addresses environmental justice matters by
21 (1) identifying the location of minority and low-income populations that may be affected by long-
22 term storage of spent fuel at nuclear power plant sites, (2) determining whether there would be
23 any potential human health or environmental effects to these populations and special pathway
24 receptors, and (3) determining if any of the effects may be disproportionately high and adverse.
25 The NRC has and will continue to prepare a site-specific environmental analysis, including an
26 assessment of potential impacts to minority and low-income populations prior to any future NRC
27 licensing action.

28 As discussed in Section 3.2 of this draft GEIS, nuclear power plant sites in the United States are
29 located in one of two broad regional economic settings: rural or semi-urban. Demographic
30 characteristics vary in the region around each nuclear power plant site and may be affected by
31 the remoteness of the nuclear plant to regional population centers (NRC 2013a). Nuclear power
32 plants located in both rural and semi-urban areas can have varying concentrations of minority
33 and low-income communities. Prairie Island Nuclear Generating Plant near Red Wing,
34 Minnesota, is an example of a facility in a rural environment. The Prairie Island Indian
35 Community is located immediately next to the Prairie Island Nuclear Generating Plant and is the
36 closest minority population and American Indian community to spent fuel storage pools and an
37 at-reactor ISFSI.

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1 Subsistence Consumption of Fish and Wildlife

2 Section 4-4 of Executive Order 12898 (59 FR 7629) directs Federal agencies, whenever
3 practical and appropriate, to collect and analyze information on the consumption patterns of
4 populations that rely principally on fish or wildlife for subsistence and to communicate the risks
5 of these consumption patterns to the public. In this draft GEIS, NRC considered whether there
6 were any means for minority or low-income populations to be disproportionately affected by
7 examining impacts to American Indians, Hispanics, migrant workers, and other traditional
8 lifestyle special pathway receptors. Special pathways take into account the levels of
9 radiological and nonradiological contaminants in native vegetation, crops, soils and sediments,
10 groundwater, surface water, fish, and game animals on or near power plant sites that have
11 at-reactor spent fuel storage pools and ISFSIs.

12 The special-pathway-receptors analysis is an important part of the environmental justice
13 analysis because consumption patterns may reflect the traditional or cultural practices of
14 minority and low-income populations in an area, such as migrant workers or Native Americans.
15 Traditional use of an area can be indicative of properties or resources that are historically
16 significant for a living community to maintain its cultural heritage. These places—called
17 traditional cultural properties—are discussed in Section 3.11 of this draft GEIS. For example, in
18 the Prairie Island Nuclear Generating Plant license renewal review, the Prairie Island Indian
19 Community provided NRC information about the traditional use of Prairie Island as a summer
20 encampment for fishing, hunting, gathering medicines and foods, and raising crops. During the
21 review, the Prairie Island Indian Community also expressed concern about native plants on
22 Prairie Island being displaced by invasive species and human health impacts associated with
23 the use of plants that are culturally significant to the Prairie Island Indian Community.

24 Operating nuclear power plants must have a comprehensive radiological environmental
25 monitoring program to assess the impact of site operations on the environment. During plant
26 operations, nuclear power plant operators collect samples from aquatic pathways (e.g., fish,
27 surface water, and sediment) and terrestrial pathways (e.g., airborne particulates, radioiodine,
28 milk, food products, crops, and direct radiation). Contaminant concentrations found in native
29 vegetation, crops, soils, sediment, surface water, fish, and game animals in areas surrounding
30 nuclear power plants are usually quite low (i.e., at or near the threshold of detection) and are
31 seldom above background levels (NRC 2013a).

32 **3.4 Climate and Air Quality**

33 This section describes the local and regional climate, air quality, and sources of greenhouse gas
34 emissions during continued storage.

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1 **3.4.1 Climate**

2 This section describes the climate near spent fuel pools and at-reactor ISFSIs. For this
3 resource area, the License Renewal GEIS (NRC 2013a) provides the baseline description of the
4 affected environment at the start of continued storage. As described in the License Renewal
5 GEIS, weather conditions at nuclear power plant sites vary depending on the year, season, time
6 of day, and site-specific conditions, such as whether the site is located near coastal zones or in
7 or near terrain with complex features (e.g., steep slopes, ravines, and valleys). These
8 conditions can be generally described by climate zones according to average temperatures. On
9 the basis of temperature alone, there are three major climate zones: polar, temperate, and
10 tropical. Within each of the three major climate zones, there are marine and continental
11 climates. Areas near an ocean or other large body of water have a marine climate. Areas
12 located within a large landmass have a continental climate. Typically, areas with a marine
13 climate receive more precipitation and have a more moderate climate. A continental climate
14 has less precipitation and a greater range in climate. Regional or localized refinements in
15 climate descriptions and assessments can be made by considering other important climate
16 variables and climate-influencing geographic variables, such as precipitation, humidity, surface
17 roughness, proximity to oceans or large lakes, soil moisture, albedo (i.e., the fraction of solar
18 energy [shortwave radiation] reflected from the Earth back into space), snow cover, and
19 associated linkages and feedback mechanisms. Localized microclimates can be defined by
20 considering factors such as urban latent and sensible heat flux and building-generated
21 turbulence. Both national and regional maximum and minimum average annual temperature
22 and precipitation climates over the 30 years from 1971 through 2000 are summarized in
23 Section D.2 in Appendix D of the License Renewal GEIS (NRC 2013a).

24 The frequency and intensity of tornadoes, straight winds, and wind-borne missiles are a
25 consideration in the design of both spent fuel storage pools and dry cask storage systems.
26 Natural phenomena hazards, including design bases for high winds and wind-borne missiles are
27 considered in the design bases of spent fuel storage facilities, as discussed in Section 4.18.

28 **3.4.2 Greenhouse Gases**

29 Based on assessments by the Global Climate Research Program (GCRP) and the National
30 Academy of Sciences' National Research Council, the U.S. Environmental Protection Agency
31 (EPA) determined that potential changes in climate caused by greenhouse gas (GHG)
32 emissions could endanger public health and welfare (74 FR 66496). The EPA indicated that,
33 while ambient concentrations of GHGs do not cause direct adverse health effects (such as
34 respiratory or toxic effects), public health risks and impacts can result indirectly from changes in
35 climate. Based on EPA's determination, the NRC recognizes that GHGs contribute to climate
36 change, climate change can affect health and the environment, and mitigation actions are
37 necessary to reduce impacts. The NRC considers carbon dioxide and other GHG emissions in
38 its environmental reviews, and includes consideration of emissions from construction and

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1 operation of a facility (NRC 2009b). NRC guidance (NRC 2010, 2011a, 2013d) also addresses
2 consideration of GHGs and carbon dioxide in its environmental reviews for new power reactors.
3 Historically, long-term carbon dioxide levels extending back 800,000 years have ranged
4 between 170 and 300 parts per million; the GCRP estimates that present-day carbon dioxide
5 concentrations are about 385 parts per million (GCRP 2009).

6 According to GCRP estimates, carbon dioxide levels at the end of the century will range
7 between 500 and 900 parts per million (GCRP 2009). This corresponds with, at worst, a
8 projected increase in average temperature through the end of the century (around 2090) of
9 between 4° to 6°C (7° to 11°F) (GCRP 2009). The GCRP also presented the projected change
10 in precipitation from the “recent past” (1961 to 1979) through the end of the century (around
11 2090). Further, the GCRP forecasts that future precipitation will increase in northern areas,
12 while southern areas, particularly in the West, will become drier (GCRP 2009). These estimates
13 assume that no policies explicitly designed to address climate change are adopted.

14 **3.4.3 Criteria Pollutants**

15 The EPA has set National Ambient Air Quality Standards (NAAQS) (40 CFR Part 50) for six
16 criteria pollutants, including sulfur dioxide, nitrogen dioxide, carbon monoxide, ozone, particulate
17 matter (PM; PM₁₀, and PM_{2.5}), and lead. Primary NAAQS specify maximum ambient (outdoor
18 air) concentration levels of the criteria pollutants with the aim of protecting public health with an
19 adequate margin of safety.¹ Secondary NAAQS specify maximum concentration levels with the
20 aim of protecting public welfare.² States can have their own State Ambient Air Quality
21 Standards. State Ambient Air Quality Standards must be at least as stringent as the NAAQS,
22 and they can include standards for additional pollutants. If a State has no standard
23 corresponding to one of the NAAQS, then the NAAQS apply. EPA’s Tribal Authority Rule
24 (63 FR 7254) also identifies provisions of the Clean Air Act that treat eligible Federally
25 recognized tribes as a state.

¹ Based on EPA regulations, primary (health-based) standards are requisite to protect public health with an “adequate margin of safety” is intended to address uncertainties associated with inconclusive evidence, and to provide a reasonable degree of protection against hazards that research has not yet identified.

² Based on EPA regulations, secondary (welfare-based) standards are requisite to protect the “public welfare” from any known or anticipated adverse effects. Welfare effects include “effects on soils, water, crops, vegetation, man-made materials, animals, wildlife, weather, visibility and climate...” (Hassett-Sipple 2011).

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1 The EPA generally designates a nonattainment
2 area based upon air quality monitoring data or
3 modeling studies that show the area violates, or
4 contributes to violations of the national standard.
5 The area also is referred to as an air quality
6 control region, which the EPA designates for air
7 quality management purposes and which
8 typically consists of one or more counties. The
9 EPA designates the area as attainment/
10 unclassifiable if the area meets the standard or
11 expects to meet the standard despite a lack of
12 monitoring data or modeling studies. After the
13 air quality in a nonattainment area improves so
14 that it no longer violates or contributes to
15 violations of the standard and the State or Tribe
16 adopts an EPA-approved plan to maintain the
17 standard, EPA can re-designate the area as
18 attainment. These areas are known as
19 maintenance areas. In the License Renewal GEIS (NRC 2013a), the NRC identified operating
20 plants located within or adjacent to counties with designated nonattainment areas. EPA
21 periodically reviews ambient pollution concentrations throughout the country and reclassifies
22 the attainment status of areas. Attainment designation status for areas is presented in
23 40 CFR Part 81.

24 Each State develops an implementation plan that includes a strategy for attaining or maintaining
25 the NAAQS, modeling that demonstrates attainment or maintenance, and various rules,
26 regulations, and programs that provide the necessary air pollutant emissions reductions. On
27 tribal lands, Federally recognized Indian tribes can develop their own tribal implementation plan,
28 similar to State implementation plans. If the State or Tribe fails to submit a required plan, EPA
29 can promulgate a plan known as a Federal implementation plan. In accordance with
30 Section 176(c) of the Clean Air Act and the General Conformity Regulations (40 CFR Part 51
31 and Part 93), the NRC must analyze its licensing actions to ensure that its Federal action
32 conforms to any applicable implementation plan. Conformity determinations are required when
33 a department, agency, or instrumentality of the Federal government engages in, supports in any
34 way or provides financial assistance for, licenses or permits, or approves any activity to ensure
35 that the activity conforms to an applicable implementation plan. Currently, the General
36 Conformity Regulations (40 CFR Part 51 and Part 93) apply to all Federal actions that are taken
37 in nonattainment or maintenance areas.

38 The NRC will evaluate and document the need for a conformity determination for the activities
39 within its authority that require an NRC license. These evaluations are completed as part of

Three EPA Air Quality Designations

- **~~NonAttainmentNonattainment~~**: Any area that does not meet (or that contributes to ambient air quality in a nearby area that does not meet) the national primary or secondary ambient air quality standard for the pollutant.
- **~~NonAttainment~~**: Any area ~~(other than an area identified in clause (i))~~ that meets the national primary or secondary ambient air quality standard for the pollutant.
- **Unclassifiable**: Any area that cannot be classified on the basis of available information as meeting or not meeting the national primary or secondary ambient air quality standard for the pollutant.

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1 licensing actions involving new reactors, reactor license renewal, and any specifically licensed
2 ISFSI. Most NRC licensing actions involve emissions well below *de minimis* levels established
3 by EPA in the General Conformity Regulations (e.g., 100 tons per year for nitrogen oxide
4 emissions [a precursor to ozone] in maintenance areas). As described further in Chapter 4,
5 emissions of criteria pollutants during continued storage are likely to remain below *de minimis*
6 levels at all sites, and a general conformity determination would not be required.

7 **3.5 Geology and Soils**

8 This section describes the geology and soils that have the potential to be affected by continued
9 storage of spent fuel.

10 The geologic environment of a nuclear power plant consists of the regional physiography,
11 tectonic setting, and composition and physical properties of the bedrock and sedimentary strata
12 underlying the site. Geologic hazards are also a condition of the geologic environment,
13 including faulting and seismicity (NRC 2013a). Seismic hazards are the most ubiquitous of the
14 geologic hazards, and almost all parts in the United States are subject to some potential for
15 earthquake-induced vibrations. The likelihood and intensity of earthquake-induced vibratory
16 ground motion at reactors depend on two factors. First, the number, frequency, and location of
17 earthquakes depend on the site's tectonic setting, tectonic activity, and nature of the seismic
18 sources. Second, the physical characteristics of bedrock and soils beneath the site determine
19 how earthquake energy is attenuated or amplified as it travels from the earthquake sources to
20 the site. Both factors are integral to the development of the earthquake hazard assessments
21 that form the bases for the seismic design of spent fuel pools and dry cask storage systems.
22 Natural phenomena hazards in the design basis of spent fuel storage facilities, including seismic
23 design, are addressed in Section 4.18, "Environmental Impacts of Postulated Accidents."

24 The general characteristics of nuclear power plants are discussed in Section 2.1.1 of this draft
25 GEIS, in the License Renewal GEIS, and in environmental statements and environmental
26 impact statements prepared for initial construction and operation of nuclear power plants. All
27 safety-related structures (e.g., seismic category 1 structures) at nuclear power plants are
28 founded either on competent natural or engineered strata to ensure that no safety-related
29 facilities are constructed in potentially unstable materials (NRC 2013a).

30 During construction of nuclear power plants, soil is disturbed for buildings, roads, parking
31 lots, underground utilities (including cooling water system intake and discharge systems),
32 aboveground utility structures (including transmission lines), cooling towers, and other
33 structures (NRC 2013a), including at-reactor ISFSIs, which are usually constructed during
34 nuclear power plant operations. Nuclear power plant sites range in size from 34 ha (84 ac)
35 at the San Onofre plant in California to 5702 ha (14,090 ac) at the Clinton plant in Illinois.

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1 At-reactor ISFSIs range in size from 0.06 to 6 ha (0.15 to 15 ac). The proportion of land that
2 remains undisturbed or undeveloped by construction activities varies from site to site.

3 Soils form over time in response to weathering and erosion of parent materials (underlying
4 bedrock or sediments), and as soils mature, they develop distinct horizons or layers that have
5 varying properties and potential uses. Across the United States, soils have a variety of
6 compositions and related physical properties, depending on the local geologic conditions and
7 climate. The degree of infiltration and the relative movement of groundwater or contaminants
8 through the soils depend on these physical properties.

9 The geologic resources in the vicinity of each nuclear plant and at-reactor ISFSI vary with the
10 location and land-use activities. For example, where mining operations occur (e.g., sand and
11 gravel pit operations or quarrying for crushed stone), there is little if any interaction between
12 plant operations and local mining industries. However, some nuclear plants may purchase
13 materials for landscaping and site construction from local sources. Commercial mining or
14 quarrying operations are not allowed within nuclear power plant boundaries (NRC 2013a).

15 **3.6 Surface-Water Quality and Use**

16 This section describes the surface water use and quality that could be affected by the continued
17 storage of spent fuel in spent fuel pools and at-reactor ISFSIs.

18 Because nuclear reactor operations rely predominantly on water for cooling, most nuclear power
19 plant sites are located near reliable sources of water. These sources are often surface
20 waterbodies such as rivers, lakes, oceans, bays, and reservoirs and other man-made
21 impoundments (NRC 2013a). The single exception is the Palo Verde Nuclear Generating
22 Station in Arizona, which uses treated municipal wastewater for cooling water. Of the 65 sites in
23 the United States that contain NRC-licensed nuclear power plants, 32 are located near rivers,
24 22 near lakes and reservoirs, 5 near oceans, and 5 near estuaries and bays. These
25 waterbodies form part of the affected environment for storage of spent fuel in spent fuel pools
26 and at-reactor ISFSIs. Local drainage features at and near nuclear power plant sites, such as
27 creeks and small streams, provide avenues for surface-water movement and interaction with
28 surface waterbodies. Depending on regional precipitation regimes, local topography, and
29 drainage patterns, operation of spent fuel pools and at-reactor ISFSIs may affect the availability
30 and quality of these nearby surface-water resources.

31 Provisions of the Clean Water Act regulate the discharge of pollutants into waters of the
32 United States. Discharges of cooling water and other plant wastewaters are monitored through
33 the National Pollution Discharge Elimination System (NPDES) program administered by the
34 EPA, or, where delegated, individual States. An NPDES permit is developed with two levels of
35 controls: (1) technology-based limits and (2) water quality-based limits. NPDES permit terms

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1 may not exceed 5 years, and the applicant must reapply at least 180 days prior to the permit
2 expiration date. The NPDES permit contains requirements that limit the flow rates and pollutant
3 concentrations that may be discharged at permitted outfalls. Biocides and other contaminants
4 in discharged cooling waters are governed by NPDES permit restrictions to reduce the potential
5 for toxic effects on nontargeted organisms (e.g., native mussels and fish). NPDES permits
6 impose temperature limits for effluents (which may vary by season) and/or a maximum
7 temperature increase above the ambient water temperature (referred to as “delta-T,” which also
8 may vary by season). Other aspects of the permit may include the compliance measuring
9 location and restrictions against plant shutdowns during winter to avoid drastic temperature
10 changes in surface waterbodies. The permit also may include biological monitoring parameters
11 that are primarily associated with the discharge of cooling water.

12 Wastewater discharge is also covered through NPDES permitting, and it includes biochemical
13 monitoring parameters. Conditions of discharge for each plant are specified in its NPDES
14 permit issued by the State or EPA. Most plants have a stormwater management plan, with the
15 parameter limits of the storm water outfalls included in the NPDES permit. Plants also may
16 have a spill prevention, control, and countermeasures plan that provides information on
17 potential liquid spill hazards and the appropriate absorbent materials to use if a spill occurs.

18 In an effort to minimize or eliminate impacts to the water quality of receiving waterbodies, best
19 management practices are typically included as conditions within NPDES permits. Best
20 management practices are measures used to control the adverse stormwater-related effects of
21 land disturbance and development. They include structural devices designed to remove
22 pollutants, reduce runoff rates and volumes, and protect aquatic habitats. Best management
23 practices also include nonstructural or administrative approaches, such as training to educate
24 staff on the proper handling and disposal of potential pollutants.

25 After cessation of reactor operations at the nuclear power plant sites, water use would be
26 reduced to spent fuel pool cooling, radiation protection for workers, maintenance, human
27 consumption, and personal hygiene.

28 **3.7 Groundwater Quality and Use**

29 This section describes the groundwater use and quality that could be affected by the continued
30 storage of spent fuel in spent fuel pools and at-reactor ISFSIs.

31 Groundwater, which has been used as a water supply source throughout recorded history, is
32 found in the voids of unconsolidated geologic materials (e.g., sand and gravel), in fractures of
33 consolidated rocks (e.g., sedimentary, metamorphic, igneous, and volcanic rocks), and in
34 conduits/channels of carbonates (e.g., limestone and dolomites). Where groundwater can be
35 found in the subsurface depends on the geologic history of an area. The quantity and quality of

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1 groundwater for domestic uses depends on site-specific conditions. Anthropogenic impacts
2 may affect groundwater quality, but those impacts also are site specific. Both unconfined and
3 confined aquifers that can provide a potential water supply source for domestic use may exist
4 beneath a nuclear power plant site. The type of aquifers and their properties at nuclear power
5 plant sites are site specific and can vary considerably.

6 In the eastern United States, most nuclear power plant sites are located in two large regional
7 groundwater provinces: (1) the first is composed of the Atlantic and Eastern Gulf coastal plain,
8 the Southeastern coastal plain, and the Gulf of Mexico coastal plain; and (2) the second is
9 composed of the Central Glaciated and the Central Nonglaciated plains (Back et al. 1988). The
10 first groundwater province, which extends from New Jersey south to Florida and west along the
11 Gulf of Mexico, includes aquifers that have moderate to very high transmissivity values,
12 moderate to high recharge rates, and moderate- to high-yield wells. In contrast, the second
13 groundwater province, which includes the Great Lakes and upper Midwest, includes aquifers
14 that have moderate to high transmissivity values, lower recharge rates, and low- to moderate-
15 yield wells.

16 In addition, several nuclear power plant sites are located in the Piedmont and Blue Ridge and
17 the Appalachian Plateau and Valley and Ridge groundwater regions (Back et al. 1988).
18 Aquifers in the Piedmont and Blue Ridge region have low transmissivity values, and while
19 recharge rates are moderate to high, typical wells have very low yields. By contrast, aquifers in
20 the Appalachian Plateau and Valley and Ridge have moderate to high transmissivity values,
21 moderate to high recharge rates, and low to moderate-yield wells.

22 Two of the four nuclear power plant sites located in the western United States use cooling water
23 from the Pacific Ocean. These two nuclear power plants are located in the Pacific Coast Range
24 region of California. The geologic complexity of this region creates diverse hydrogeologic
25 conditions. Another power plant in the west uses cooling water from the Columbia River, which
26 dissects the prolific bedded basalt aquifer system of the Columbia Lava Plateau, while the
27 fourth, located in the Central Alluvial Basins of the arid desert southwest, uses treated municipal
28 wastewater for cooling (Back et al. 1988).

29 Many of the nuclear power reactor sites in the United States that are adjacent to lakes, rivers,
30 reservoirs, and engineered cooling ponds are constructed on unconsolidated stream, glacial,
31 and lake deposits that host shallow, unconfined to semi-confined aquifers (Back et al. 1988).
32 Where unconsolidated permeable deposits are thin or not inter-bedded with lower permeability
33 sediments, local groundwater flow systems may be hydraulically connected to deeper, regional
34 to sub-regional groundwater flow systems in underlying permeable unconsolidated deposits,
35 coarse-grained sandstone, carbonate units with solution features, and folded or fractured
36 crystalline rocks. Where shallow aquifers are immediately underlain by thick, impermeable
37 shale or massive, unjointed carbonate strata, there is likely little or no hydraulic connection with
38 deeper, regional groundwater flow systems.

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1 Contaminants may enter an aquifer system and be transported with the hydraulic gradient. The
2 direction and rate of contaminant transport will depend on the site-specific properties of the
3 aquifer. For relatively permeable aquifers with a substantial hydraulic gradient, contaminants
4 would be transported down-gradient quickly. For relatively permeable aquifers with a low
5 hydraulic gradient, contaminants would move very slowly down-gradient. Typically, a
6 contaminant plume would be elongated in the direction of the hydraulic gradient because
7 transverse mixing (transverse dispersion) is much less than in the groundwater flow direction
8 (longitudinal dispersion) (Todd 1960). For relatively low permeable aquifers, contaminants
9 would move very slowly.

10 As noted in the License Renewal GEIS (NRC 2013a), leaks and spills during the licensed life for
11 operation at reactors have resulted in groundwater and soil contamination. Industrial practices
12 involving the use of solvents, heavy metals, or other chemicals and unlined wastewater lagoons
13 have the potential to contaminate site groundwater, soil, and subsoil. Contamination is subject
14 to State- and EPA-regulated cleanup and monitoring programs (NRC 2013a). In addition,
15 radionuclides, particularly tritium, have been released to groundwater at many plants.
16 Underground system leaks of process water also have been discovered in recent years at
17 several plants. A description of spent fuel pool leaks at NRC-licensed facilities is included in
18 Appendix E.

19 Because tritium travels through groundwater faster than most other radionuclides, tritium is
20 generally the first radionuclide to be identified in groundwater after a radioactive spill or leak.
21 There are 65 locations in the United States where commercial nuclear power plants are
22 operating. Records indicate that, at some time during their operating history, 42 of these sites
23 have had leaks or spills involving tritium concentrations in excess of the 20,000 pCi/L drinking
24 water standard established in the Safe Drinking Water Act. Nineteen sites are currently
25 reporting tritium concentrations, from a leak or spill, in excess of 20,000 pCi/L onsite. However,
26 no site is currently detecting tritium in excess of 20,000 pCi/L offsite, or in drinking water
27 (NRC 2012c).

28 On June 17, 2011, the NRC issued the Decommissioning Planning Rule (76 FR 35512). This
29 rule, through changes to the regulations at 10 CFR 20.1406 and 20.1501, requires licensees to
30 "... minimize the introduction of significant residual radioactivity into the site, including the
31 subsurface, and to perform radiological surveys to identify the extent of significant residual
32 radioactivity at their sites, including the subsurface" (NRC 2012d). As a result, all currently
33 operating NRC-licensed nuclear power plants and any nuclear power plant that may be built in
34 the future are required to perform groundwater monitoring to determine the extent of any
35 existing contamination and to aid in the timely detection of any future contamination. Timely
36 detection of leakage will allow licensees to identify and repair leaks and employ mitigation
37 measures, as necessary, to minimize or eliminate any environmental impacts that would result
38 from leaks.

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1 Licensees that have implemented a groundwater monitoring program consistent with the
2 Nuclear Energy Institute Groundwater Protection Initiative are considered to have an adequate
3 program for the purposes of the Decommissioning Planning Rule (NRC 2011b). Additional
4 discussion pertaining to groundwater monitoring can be found in Appendix E of this draft GEIS.

5 **3.8 Terrestrial Resources**

6 This section describes the general terrestrial resources that could be affected by continued
7 storage of spent fuel in spent fuel pools and at-reactor ISFSIs. Terrestrial plant and animal
8 communities found on land may be subject to potential effects associated with spent fuel
9 storage facilities (wet storage in spent fuel pools or dry storage in casks).

10 Nuclear power plants (which include spent fuel pools) and associated at-reactor ISFSIs (which
11 are located on nuclear power plant sites) are sited in a wide variety of terrestrial habitat types
12 from coastal to intermountain landscapes. Terrestrial habitats vary widely depending on their
13 ecoregion, or geographic location especially in relation to the climate, landforms, and soil
14 characteristics. Surrounding land uses and land forms (e.g., deserts and mountains)
15 significantly influence the local and regional biodiversity and ecosystem. For example, an arid
16 desert location is likely to have less biodiversity than a temperate rainforest. In addition,
17 impacts at the local level in the immediate vicinity of nuclear power plants and associated
18 at-reactor ISFSIs that have relatively intact, functioning ecosystems because of the lack of
19 extensive development and disturbance would provide higher quality habitat and biodiversity as
20 opposed to heavily industrialized areas where larger areas of habitat loss and disturbances
21 decreases habitat quality and biodiversity.

22 For the purposes of this analysis, terrestrial ecological resources are described in terms of
23 upland vegetation and habitats, lowland and wetland vegetation and habitats, and wildlife.

24 **3.8.1 Upland Vegetation and Habitats**

25 In general, upland terrestrial vegetation and habitats include habitats such as forests,
26 grasslands, and shrublands as opposed to lowland areas. These habitats experience changes,
27 called succession, within the vegetation communities in response to land-disturbing activities.
28 The level of disturbance varies by land-use management activities (see Section 3.1). Typically,
29 areas within the security fence at a nuclear power plant and associated at-reactor ISFSI have
30 been modified by construction and maintenance activities and are maintained as modified
31 landscapes for operational and security purposes. Some of these areas could contain relatively
32 undisturbed habitat. Disturbed habitats are characterized mainly by grasses, forbs, and shrubs
33 that represent the early successional stage. A maintenance activity, such as mowing and
34 herbicide or pesticide applications, limits the diversity and maturity of plant species that are
35 present. After construction of nuclear power plants and during maintenance activities, non-

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1 native plant species and weeds often replace the naturally occurring vegetation while natural
2 forest or shrubland in various degrees of disturbance may be present outside the security fence
3 (NRC 2013a). The affected habitats for continued storage would be similar to habitats
4 described in the License Renewal GEIS because spent fuel pools and at-reactor ISFSIs are
5 located at the nuclear power reactor sites described in the License Renewal GEIS.

6 Several operational activities at nuclear power plants may have effects on upland vegetative
7 communities and habitats. As described in License Renewal GEIS (NRC 2013a), terrestrial
8 habitats near nuclear power plants can be subject to small amounts of radionuclides.
9 Radionuclides, such as tritium, and other constituents in cooling water systems, such as
10 biocides, that enter shallow groundwater can also be taken up by terrestrial plant species.
11 Maintenance activities along nuclear power plant transmission line corridors (cutting vegetation
12 and using herbicides) within the property boundary of a nuclear power plant can contribute to
13 habitat fragmentation and affect the distribution of plant and animal species in areas near the
14 corridors. Nuclear power plants with closed-cycle cooling water systems may deposit water
15 (and salt) droplets on vegetation and increase humidity in the area relatively close to the cooling
16 towers during the period that the spent fuel pool is operated. In addition, heat dissipated during
17 power plant operations by a combination of radiation, conduction, and convection can expose
18 terrestrial habitats to elevated temperatures (NRC 2013a).

19 **3.8.2 Lowland and Wetland Vegetation and Habitats**

20 Lowlands along rivers, streams, and coastlines may include floodplains and several types of
21 wetlands (riverine, palustrine, lacustrine, estuarine, and marine) that support fish and wildlife.
22 As of 2007, wetlands covered an average of 3 percent of the land area near nuclear power
23 plants and at-reactor ISFSIs, as mapped by the National Wetland Inventory (FWS 2007).
24 Wetlands exclude permanently flooded areas that occupy, on average, about 10 percent of the
25 area within 8 km (5 mi) of nuclear power plants (NRC 2013a). Wetland vegetation is
26 hydrophytic (i.e., able to withstand waterlogged conditions) whether anchored on relatively dry
27 land or in standing water. Depending on the wetland type, vegetation can vary widely from
28 flowering plants, grasses, shrubs (reeds, sedges, and rushes), ferns, and trees.

29 During the initial nuclear power plant license periods, wetlands near nuclear power plants were
30 affected by construction and operation activities (e.g., maintaining power line corridors, dredging
31 wetland sediments, and sediment disposal) that caused storm water runoff, changes in
32 vegetative plant community characteristics, altered hydrology, decreased water quality, and
33 sedimentation. Some wetlands have been affected by nuclear power plant cooling systems that
34 can increase the salinity of stream segments, increase water temperatures, and introduce
35 contaminants to wetlands that receive groundwater discharge. However, wetlands have also
36 been created at some power plants that use cooling ponds (NRC 2013a).

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1 **3.8.3 Wildlife**

2 Terrestrial animals (i.e., land mammals, insects, birds, amphibians, and reptiles) in the vicinity of
3 a nuclear power plant and associated at-reactor ISFSI are typical of species found in a
4 particular ecoregion and vary widely across the United States. The removal of vegetation
5 during plant construction and operations have affected the habitat quality and, at some sites,
6 reduced the available habitat by hundreds of acres. Wildlife biodiversity and ecological function
7 in disturbed areas of nuclear power plant sites, including at-reactor ISFSIs, is different than in
8 undisturbed areas, in part because the wildlife communities supported by disturbed areas are
9 different than those that undisturbed areas support (NRC 2013a). Disruptive human activities
10 (e.g., noise, ground vibrations, mechanical equipment, vehicles, and physical obstructions) also
11 repel animals that are less tolerant to such disturbances. At the beginning of continued storage,
12 these disturbed and undisturbed areas will be identical to the areas that existed during
13 operations.

14 Maintenance activities along nuclear power plant transmission line corridors within the property
15 boundary of the plant, which will continue for during continued storage, affects the distribution of
16 plant and animal species in areas near the corridors and expose wildlife to nonionizing radiation
17 exposure from transmission line electromagnetic fields (NRC 2013a).

18 Wildlife species that rely on and use the water resources at the reactor site will continue to be
19 affected by continued storage. For example, the ongoing use of the spent fuel pool cooling
20 system could introduce hazards to some wildlife and could create water-use conflicts with
21 wildlife in the area. Wildlife species that occupy onsite habitats are exposed to a variety of
22 contaminants and factors associated with nuclear power plant and at-reactor ISFSI operations
23 and maintenance. The maintenance required for landscaped areas generally keeps the
24 diversity of wildlife at a reduced level compared to unmaintained surrounding habitats. Wildlife
25 species within the security areas are typically limited by the low quality of the habitat present
26 and generally include common species adapted to industrial developments (NRC 2013a).

27 **3.9 Aquatic Ecology**

28 This section describes the general aquatic resources that could be affected by the continued
29 storage of spent fuel in spent fuel pools and at-reactor ISFSIs. Aquatic biota found in water,
30 may be subject to potential effects associated with spent fuel storage facilities (wet storage in
31 spent fuel pools or dry storage in casks).

32 The information contained in the following sections is a brief summary of aquatic resources
33 known to exist near nuclear power plant sites which include spent fuel pools and associated
34 at-reactor ISFSIs. The majority of this information comes from the License Renewal GEIS
35 (NRC 2013a), which describes a range of potentially affected aquatic resources that may be

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1 found in the vicinity of nuclear power plants. The affected environment for continued storage
2 would be similar to the affected environment described in the License Renewal GEIS because
3 spent fuel pools and at-reactor ISFSIs are located within power reactor sites, and the end of
4 reactor operations would not significantly alter the affected environment for these resources. A
5 more detailed account of the range of aquatic environments existing at these facilities can be
6 found in the License Renewal GEIS.

7 Nuclear power plant sites must be located near waterbodies that are large enough to
8 adequately meet the demands of a plant's cooling systems. At-reactor ISFSIs are generally
9 located near power plants. Therefore, nuclear power plant sites are usually placed near marine
10 and estuarine coastal areas, on the Great Lakes, and along major rivers and reservoirs. A few
11 power plants are sited near small streams (e.g., the V.C. Summer plant in South Carolina and
12 the Clinton plant in Illinois), and initial construction activities included impounding the streams to
13 create cooling ponds or reservoirs.

14 To establish the affected environment for this analysis, aquatic resources are described in terms
15 of aquatic habitats (freshwater rivers, reservoirs, and lakes and coastal estuarine and marine
16 systems) and aquatic biota (fish, macroinvertebrates, zooplankton, phytoplankton and
17 macrophytes, other aquatic vertebrates and invertebrates, and aquatic vegetation).

18 **3.9.1 Aquatic Habitats**

19 A wide range of aquatic habitats occur in the vicinity of U.S. nuclear power plant sites due to
20 differences in geographies, physical conditions (e.g., substrate type, temperature, turbidity, and
21 light penetration), chemical conditions (e.g., dissolved oxygen levels and nutrient
22 concentrations), biological interactions (e.g., consumption of various algal and invertebrate
23 species that provide habitats, such as sea grass or shellfish beds), seasonal influences, and
24 man-made modifications. The interactions of these factors often define the specific type of
25 aquatic habitats and communities within a particular area. Three main aquatic ecosystem types
26 occur near nuclear power plant sites: freshwater, estuarine, and marine ecosystems.

27 **3.9.1.1 Freshwater Systems**

28 Freshwater systems are generally classified into two groups based on the degree of water
29 movement. Lentic systems are waterbodies with standing or slow-flowing water, such as ponds,
30 lakes, reservoirs, and some canals. During warmer months, the upper and lower depths will
31 stratify or become two layers that have different oxygen content and nutrient status. Lotic
32 habitats, on the other hand, feature moving water and include natural rivers and streams and
33 some artificial waterways. Most lotic habitats do not stratify (Morrow and Fischenich 2000).
34 Some freshwater aquatic species may occur in both lentic and lotic habitats. However, many
35 species are adapted to the physical, chemical, and ecological characteristics of one system or

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1 the other and the overall ecological communities
2 present within these aquatic ecosystem types differ
3 for different regions of the country (NRC 2013a).

4 A number of major rivers provide cooling water for
5 nuclear power plant sites. The geographic area,
6 gradient of the river bed, velocity of the current, and
7 source of nutrients and organic matter at the base of
8 the food chain will largely determine species
9 composition and ecological conditions within riverine
10 environments. In some instances, nuclear power
11 plants that use rivers for cooling are located on
12 sections of rivers that have been impounded,
13 creating reservoirs. Impoundment of a river can alter
14 ecological communities occurring in a given
15 waterbody by blocking movement of aquatic
16 organisms, changing flow and temperature
17 characteristics, adding chemical pollutants, and
18 introducing non-native species. Fish species in
19 numerous reservoirs are often stocked and managed
20 to support local recreational fisheries (NRC 2013a).

21 Littoral, pelagic, and profundal habitat zones are all
22 found within lentic systems and are classified on the
23 basis of water depth and light penetration in the
24 water. Littoral habitats refer to nearshore shallower
25 waters where sufficient light reaches the bottom to enable rooted plants to grow. Pelagic
26 habitats include open offshore waters where light intensity is great enough for photosynthesis to
27 occur. Profundal habitats are found in deep-water areas where light penetration is insufficient to
28 support photosynthesis (Armantrout 1998). Unique ecological communities inhabit each zone,
29 reflecting the preferences and tolerances of various aquatic species (NRC 2013a).

30 In the Great Lakes, species diversity and biomass of fish are greater nearshore than in the
31 offshore areas since these areas feature habitats and conditions that are favorable for most
32 species of Great Lakes fish for at least some portion of their life cycle (Edsall and Charlton
33 1997). Threats to the ecological integrity of the Great Lakes include eutrophication (nutrient
34 enrichment), land-use changes, overfishing, invasive species, and pollution (Beeton 2002).
35 Regulations and best management practices have been implemented to reduce nutrient
36 inputs and control land use changes, such as shoreline alteration and destruction of wetlands.
37 Invasive species, however, have become a major problem as nonindigenous species gain
38 access to the Great Lakes. The introduction of invasive species can result in changes to
39 native ecological communities (NRC 2013a).

Aquatic Ecosystem Types

- ***Freshwater:*** Waters that contain a salt concentration or salinity of less than 0.5 parts per thousand (ppt) or 0.05 percent.
 - *Lentic:* Stagnant or slow-flowing fresh water (e.g., lakes and ponds).
 - *Lotic:* Flowing fresh water with a measurable velocity (e.g., rivers and streams).
- ***Marine:*** Waters that contain a salt concentration of about 30 ppt (e.g., ocean overlying the continental shelf and associated shores).
- ***Estuarine:*** Coastal bodies of water, where freshwater merges with marine waters. The waterbodies are often semi-enclosed and have a free connection with marine ecosystems (e.g., bays, inlets, lagoons, and ocean-flooded river valleys). Salinity concentrations fluctuate between 0 and 30 ppt, varying spatially and temporally due to location and tidal activity.

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1 **3.9.1.2 Estuarine Ecosystems**

2 Brackish to saltwater estuarine ecosystems occur along the coastlines of the United States.
3 General habitat types found within estuarine ecosystems include the mouths of rivers, tidal
4 streams, shorelines, salt marshes, mangroves, sea grass communities, soft-sediment habitats
5 (e.g., mudflats and shellfish beds), and open water. Estuaries can serve as important staging
6 points during the migration of certain fish species providing a refuge from predation while
7 physiologically adjusting to the changes in salinity. Numerous marine fish and invertebrate
8 species spawn in or use estuaries as places for young fish to develop before moving to marine
9 habitats. Estuarine habitats also support important commercial or recreational finfish and
10 shellfish species (NRC 2013a).

11 **3.9.1.3 Marine Ecosystems**

12 Marine ecosystems occur along the coastline and offshore of the United States. General habitat
13 types within marine ecosystems include the rocky intertidal, rocky subtidal, deep-sea
14 communities, sea grass communities (e.g., kelp beds), soft-sediment communities (e.g., sandy
15 bottom or mudflats), and the open water or pelagic habitats. Species often compete for space
16 within rocky subtidal and intertidal habitats. The area where species eventually settle is often a
17 tradeoff between accommodating physiological stress and avoiding predation and/or
18 competition with other species. For example, lower depths may provide a more ideal habitat in
19 terms of physical requirements (e.g., temperature, pressure, salinity, and avoiding desiccation),
20 but shallower areas may provide a refuge from predation. As a result, many organisms
21 (including seaweeds, invertebrates, and some fish) that use rocky subtidal and intertidal habitats
22 are restricted to a depth zone that balances physiological and biological pressures (Witman
23 1987). Marine habitats support important commercial or recreational finfish and shellfish
24 species (NRC 2013a).

25 **3.9.2 Aquatic Organisms**

26 Aquatic organisms are known to occur near nuclear power plant sites. The following
27 discussions provide high-level overviews of aquatic organisms that are known to exist in
28 habitats near nuclear power plant sites. Additional details regarding aquatic organisms and
29 species that occur near nuclear power plant sites are provided in the License Renewal GEIS
30 (NRC 2013a).

31 **3.9.2.1 Fish**

32 Fish can be characterized as freshwater, estuarine, marine, and migratory (e.g., anadromous
33 and catadromous) species. The first three categories are based on salinity regimes. For
34 example, freshwater fish usually inhabit waters with a salinity of less than 0.5 parts per
35 thousand (ppt), although some species can tolerate a salinity as high as 10 ppt; estuarine fish

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1 inhabit tidal waters with salinities that range between 0 and 30 ppt; and marine fish typically live
2 and reproduce in coastal and oceanic waters with salinities that are at or more than 30 ppt.

3 Migratory fish are generally categorized by their migratory patterns, or periodic movements that
4 result in regularly alternating between two or more separate habitats (Northcote 1978). For
5 example, anadromous species migrate from the ocean waters to freshwater to spawn, while the
6 opposite situation occurs for catadromous species. Amphidromous species also migrate
7 between fresh and saltwater, but these migrations are not related to the reproductive cycle.
8 Potamodromous species migrate entirely within a freshwater system (e.g., some species tend to
9 move to upstream areas for spawning) whereas oceanodromous species migrate entirely within
10 the ocean (e.g., some species tend to move northward as waters warm and southward as they
11 cool). A number of fish species that occur in the vicinity of the power plants are considered
12 commercially or recreationally important, while others serve as forage for those species
13 (NRC 2013a).

14 Fish are also categorized by the water depth that they inhabit. For example, pelagic fish live
15 within the water column. Demersal fish live on or near the bottom of the sea floor (or bottom of
16 the waterbody) and benthic fish live on the sea floor (or bottom of the waterbody). The
17 distribution of demersal and benthic fish is usually highly dependent on the type of substrate
18 that lines the floor of the waterbody. For example, certain fish prefer soft, sandy bottom habitat,
19 whereas other fish prefer rocky substrates with crevices in which to hide. Other typical bottom
20 water substrates that provide fish habitat include mud flats, kelp beds, submerged aquatic
21 vegetation, salt marshes, mangroves, shellfish beds, and coral reefs.

22 **3.9.2.2 Aquatic Macroinvertebrates**

23 A broad range of aquatic macroinvertebrates may be found near nuclear power plant sites.
24 Macroinvertebrates are responsible for controlling key ecosystem processes, including primary
25 production, decomposition, nutrient regeneration, water chemistry, and water clarity. Mussels
26 consume plankton (i.e., planktivores) and are prey items for some fish and other vertebrates.
27 Macroinvertebrates require good water quality and physical habitat conditions that will support
28 populations of their host fish species. Williams et al. (1993) reported that, of the nearly
29 300 native freshwater mussels in the United States and Canada, nearly 72 percent are
30 considered endangered, threatened, or of special concern, almost 5 percent are of
31 undetermined status, and less than 24 percent are considered stable. Mussels occur in the
32 vicinity of most plants that use freshwater as a cooling water source. Several species of
33 non-native freshwater mussels and clams have been introduced to the United States and have
34 reached nuisance levels. These species can alter trophic and nutrient dynamics of aquatic
35 ecosystems and displace native mussels. Many of the nuclear plants have programs in place to
36 monitor for these nuisance species and, as appropriate, to control them, usually using biocides
37 (NRC 2013a).

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1 **3.9.2.3 Zooplankton**

2 Zooplankton are small animals that float, drift, or weakly swim in the water column of any
3 waterbody, and include, among other forms, fish eggs and larvae with limited swimming ability,
4 larvae of benthic invertebrates, medusoid forms of hydrozoans, copepods, shrimp, and krill
5 (Euphausiids). Plankton are often categorized by how and where they inhabit the water column,
6 including holoplankton (plankton that spend their entire lifecycle within the water column),
7 meroplankton (plankton that spend a portion of their lifecycle in the water column), and
8 demersal (benthic species that primarily reside on the seafloor but migrate into the water
9 column on a regular basis). Zooplankton is an important link between phytoplankton and fish or
10 other secondary consumers (NRC 2013a).

11 **3.9.2.4 Phytoplankton and Aquatic Macrophytes**

12 Phytoplankton, also referred to as microalgae, contain chlorophyll and require sunlight to live
13 and grow. Most phytoplankton are buoyant and float in the upper part of the ocean, where
14 sunlight penetrates the water. Phytoplankton is an important food source for some invertebrate
15 and fish species and is important for carbon fixation (converting carbon dioxide to organic
16 materials via photosynthesis). Periphyton (algae attached to solid submerged objects) includes
17 species of diatoms and other algae that grow on natural or artificial substrates.

18 **3.9.2.5 Other Aquatic Invertebrates and Vertebrates**

19 Other important aquatic species include cephalopods (e.g., squid and octopus), marine
20 mammals (e.g., seals and whales), sea turtles, and reptiles. These species may be present
21 near at-reactor storage facilities; however, because of the significantly reduced water demands
22 for spent fuel pool cooling during continued storage, these larger organisms are more likely to
23 avoid being impinged or entrained by the cooling system, and are therefore not discussed in
24 Chapter 4 of this draft GEIS.

25 **3.9.2.6 Aquatic Vegetation**

26 Aquatic vegetation, including kelp, submerged aquatic vegetation, and sea grasses, provide
27 important habitat for aquatic organisms and are often referred to as underground meadows or
28 forests. Aquatic vegetation provides food, structurally complex habitat, areas to hide from
29 predators, and spawning grounds for many aquatic species.

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1 3.10 Special Status Species and Habitats

2 Several Federal and State acts protect aquatic and
3 terrestrial species and habitats. Federally listed
4 species, critical habitat, essential fish habitat (EFH),
5 and other special status species and habitats are
6 known to occur near nuclear power plant sites
7 (NRC 2013a). The License Renewal GEIS provides
8 additional details on the types of special status
9 species that have occurred near nuclear power
10 plants, such as sea turtles, fish, birds, and other
11 protected species.

12 Federally listed threatened and endangered species
13 and critical habitat are protected under the
14 Endangered Species Act of 1973 (ESA), while State-
15 listed species and habitats are protected under
16 provisions of various State regulations. Under the
17 ESA, the NRC must consult with the U.S. Fish and
18 Wildlife Service (FWS) and the National Marine
19 Fisheries Service (NMFS) for actions that could affect
20 Federally listed species or critical habitat. Prior to
21 initial licensing, the NRC would be required to consult
22 with the FWS and/or the NMFS under Section 7 of
23 the ESA to determine the presence of and potential
24 impacts to any Federally listed species or critical
25 habitat at or near the site. Section 7 ESA
26 consultation could also be required after a license is
27 granted if operations could impact a listed species or
28 if a species is newly listed under ESA and that
29 species occurs near the NRC-licensed facility, as
30 described in more detail in Section 4.11. The
31 objective of the consultation is to identify and assess
32 potential impacts to listed species and critical habitat.
33 Any ongoing or proposed activity associated with the
34 operation or maintenance of spent fuel pools or
35 ISFSIs that has the potential to affect a listed species
36 requires that the NRC initiate consultation under Section 7 of the Endangered Species Act with
37 the FWS or the NMFS depending on the species. Additional information on how the
38 consultation process is used to identify, evaluate, and mitigate potential impacts to Federally
39 listed species and critical habitat is discussed in Chapter 4.

Terms Related to Threatened, Endangered, and Protected Species and Habitats

- ***Endangered Species:*** Animal or plant species in danger of extinction throughout all or a significant portion of its range.
- ***Threatened Species:*** Animal or plant species likely to become endangered within the foreseeable future throughout all or a significant portion of its range.
- ***Candidate Species:*** Animal or plant species for which the FWS or NMFS has on file sufficient information on vulnerability and threats to support a proposal to list it as endangered or threatened.
- ***Proposed Species:*** Animal or plant species that is proposed in the *Federal Register* to be listed under Section 4 of the Endangered Species Act.
- ***Critical Habitat:*** Specific geographic areas, whether occupied by a listed species or not, that are essential for its conservation and that have been formally designated by rule published in the *Federal Register*.
- ***Essential Fish Habitat:*** Those waters and substrates needed by Federally managed marine and anadromous fish for spawning, breeding, feeding, or growth to maturity.

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1 The Magnuson-Stevens Fishery Conservation and Management Act, as amended, calls for the
2 description, identification, and management of EFH to help conserve and manage Federal
3 fishery resources. EFH is defined as those waters and substrates that are necessary to fish for
4 spawning, breeding, feeding, or growth to maturity. Spent fuel pools that withdraw and
5 discharge water to marine, estuarine, and coastal waters near designated EFH have the
6 potential to affect EFH because they have a potential to alter, damage, or destroy EFH
7 components, thereby affecting the fishery resources that use them (NRC 2013a).

8 Marine mammals are protected under the Marine Mammal Protection Act of 1972, as amended,
9 which also assigns responsibility for managing cetaceans (i.e., porpoises and whales), and
10 pinnipeds (i.e., seals, fur seals, and sea lions) to the NMFS. The Act prohibits, with certain
11 exceptions, the “take” (i.e., harming) of marine mammals in U.S. waters. Both the Magnuson-
12 Stevens Act and Marine Mammal Protection Act are administered by the NMFS.

13 The Bald and Golden Eagle Protection Act of 1940, as amended, provides for the protection of
14 the bald eagle (*Haliaeetus leucocephalus*) and the golden eagle (*Aquila chrysaetos*) by
15 prohibiting the taking, possession, and commerce of these birds, their nests, or their eggs. The
16 Act prescribes criminal and civil penalties for persons violating the conventions identified in
17 16 USC 668. In addition, the Migratory Bird Treaty Act of 1918, as amended, protects migratory
18 birds included in the terms of the conventions identified in 16 USC 703. Both acts are
19 administered by the FWS.

20 **3.11 Historic and Cultural Resources**

21 This section describes the historic and cultural
22 resources that could be affected by continued
23 storage. For the purposes of this draft GEIS, the
24 area of potential effect is the area that may be
25 impacted by land disturbing activities or other
26 operational activities associated with continued
27 storage of spent fuel (whether in spent fuel pools or
28 at an at-reactor ISFSI) including the viewshed. This
29 determination is made irrespective of land ownership
30 or control. A description of these sites, including
31 spent fuel pools and at-reactor ISFSIs, is provided in
32 Section 2.1 of this draft GEIS.

33 Historic and cultural resources are the remains of
34 past human activity and include prehistoric era and
35 historic era archaeological sites, historic districts, buildings, or objects with an associated
36 historical, cultural, archaeological, architectural, community, or aesthetic value. Historic and

Historic Property (36 CFR 800.16(l)(1))

Any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the *National Register of Historic Places* maintained by the Secretary of the Interior. Historic properties also include artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian Tribe or Native Hawaiian organization and that meet the *National Register* criteria.

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1 cultural resources also include traditional cultural properties that are important to a living
2 community of people for maintaining their culture. “Historic property” is the legal term for a
3 historic or cultural resource that is eligible for listing on the National Register of Historic Places
4 (NRHP) (NRC 2013a).

5 The National Historic Preservation Act of 1966, as amended (NHPA) requires Federal agencies
6 to take into account the effects of their undertakings on historic properties. Historic properties
7 are defined as resources that are eligible for listing on the NRHP. The criteria for NRHP
8 eligibility are listed in 36 CFR 60.4 and include, among other things, (1) association with
9 significant events that have made a significant contribution to the broad patterns of history,
10 (2) association with the lives of persons significant in the past, (3) embodiment of distinctive
11 characteristics of type, period, or method of construction, and (4) sites or places that have
12 yielded or may be likely to yield important information in history or prehistory (ACHP 2008). The
13 historic preservation review process (Section 106 of the NHPA) is outlined in regulations issued
14 by the Advisory Council on Historic Preservation in 36 CFR Part 800.

15 The prehistoric era refers to the period before Europeans arrived in North America in the 1490s.
16 Some of the most heavily used areas during this period were along rivers, lakes, and the
17 seashore. These locations provided freshwater and the most abundant food sources, as well as
18 the most efficient ways to travel. As a result, prehistoric era archaeological sites tend to be
19 found along these waterways. Prehistoric archaeological resources include small temporary
20 camps, larger seasonal camps that were revisited year after year, large village sites that were
21 occupied continuously over several years or potentially for centuries, or specialized-use areas
22 associated with fishing or hunting or with tool and pottery manufacture (NRC 2013a).

23 The historic era refers to the period after Europeans arrived in North America. Similar to
24 prehistoric populations, historic era sites tend to be clustered near waterways because water
25 provided a means for transportation and trade, and supported agriculture. Historic era
26 resources include farmsteads, mills, forts, residences, industrial sites (such as mines or canals),
27 and shipwrecks (NRC 2013a).

28 Traditional cultural properties are historic and cultural resources that are associated with cultural
29 practices or beliefs of a living community, and are often associated with Native American
30 cultures. Traditional cultural properties can be considered historic properties and be included
31 on the NRHP. Examples include traditional gathering areas where particular plants or materials
32 were harvested, locations where a community has traditionally carried out economic, artistic, or
33 other cultural practices important to maintaining its identity, or burial locations that connect
34 individuals or groups with their ancestors. The locations of traditional cultural properties are
35 often kept private; State Historic Preservation Offices can often be unaware of these locations
36 (NRC 2013a).

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1 Historic and cultural resources, especially archaeological sites, are sensitive to disturbance and
2 are nonrenewable. Even a small amount of ground disturbance (e.g., ground clearing and
3 grading) could affect a small but very significant resource. Much of the information contained in
4 an archaeological site is derived from the spatial relationships between soil layers and
5 associated artifacts. Once these spatial relationships are altered, they can never be reclaimed.
6 (NRC 2013a)

7 Nuclear power plant sites are located in areas of focused past human activities (along
8 waterways) and, as such, there is a potential for historic and cultural resources to be present
9 near most nuclear power plants. For example, as part of the recent License Renewal GEIS
10 update, the NRC reviewed historic and cultural resource reviews that were performed for
11 40 license renewals. For sites that had conducted field investigations, on average, the number
12 of historic and cultural resources present were 35 per site (NRC 2013a). Sites identified
13 included a variety of resources, including village and town sites, and cemeteries (NRC 2013a).

14 Most existing nuclear power plants in the United States were constructed in the 1960s, 1970s,
15 and early 1980s. Although the NHPA was passed in 1966, the process for complying with the
16 law was developing during the 1970s and early 1980s (NRC 2013a). Many existing nuclear
17 power plant sites were not investigated for the presence of historic and cultural resources prior
18 to initial facility construction. Extensive ground-disturbing activities occurred during initial
19 nuclear power plant construction, and much of the land in and immediately surrounding the
20 power block was extensively disturbed. It is unlikely that historic and cultural resources are
21 present within heavily disturbed areas. However, developed and less-developed portions of a
22 power plant site, including areas that were not extensively disturbed (e.g., construction laydown
23 areas), could still contain unknown historic and cultural resources. Laydown areas are lands
24 that were cleared, graded, and used to support fabrication and installation activities during initial
25 power plant construction.

26 For continued storage, the NRC will consider impacts to historic and cultural resources in this
27 draft GEIS through its NEPA requirements in 10 CFR Part 51. Neither the Waste Confidence
28 rulemaking nor this draft GEIS identifies specific sites for NRC licensing actions that would
29 trigger Section 106 consultation requirements that are normally conducted during site-specific
30 licensing reviews. This rulemaking is not a licensing action; it does not authorize the initial or
31 continued operation of any nuclear power plant, and it does not authorize storage of spent fuel.
32 This draft GEIS describes the potential impacts to historic and cultural resources associated
33 with continued storage of spent fuel at both at-reactor and away-from-reactor ISFSIs.

34 For site-specific licensing actions (i.e., new reactor licensing, reactor license renewal, and site-
35 specific at-reactor and away-from-reactor ISFSIs), applicants are required to provide historic
36 and cultural resource information in environmental reports submitted with license applications.
37 To prepare these assessments, applicants conduct cultural resource surveys. This information
38 assists NRC in its review of the potential impacts to historic and cultural resources. As part of

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1 these site-specific licensing actions, the NRC has and will continue to comply with the
2 consultation requirements in the NHPA regulations in 36 CFR Part 800 and consult with State
3 Historic Preservation Offices or appropriate Tribal Historic Preservation Officer, Tribal
4 representatives, and other interested parties to determine the area of potential effect and if the
5 licensing action would affect historic properties. As identified in 36 CFR 800.2, interested
6 parties can include representatives of the local government, the license applicant, the Advisory
7 Council on Historic Preservation, the public, and organizations with a demonstrated interest in
8 the undertaking. The NRC will consider information provided by these consulting parties when
9 making determinations under the NHPA. If historic and cultural resources are present within the
10 area of potential effect, identification of historic properties, adverse effects, and potential
11 resolution of adverse effects will be done through consultation and application of the NRHP
12 criteria in 36 CFR 60.4.

13 **3.12 Noise**

14 This section describes noise associated with continued storage. The affected environment is
15 the environment that exists at and around spent fuel pools and at-reactor ISFSIs where
16 continued storage activities would occur. Noise describes unwanted sound that is undesirable
17 because it interferes with speech, communication, or hearing; is intense enough to damage
18 hearing; or is otherwise annoying (NRC 2002). A common sound measurement used to
19 indicate sound intensity is the A-weighted sound level (designated as decibel-A or dB(A)). The
20 decibel expresses sound levels on a logarithmic scale and accounts for the response of the
21 human ear. The noise levels experienced at spent fuel storage locations at a particular point in
22 time depends on what noise generating activities are occurring in the vicinity.

23 Ambient noise levels depend in part on the amount of development that has occurred in the
24 area around nuclear power plant sites. In rural or low-population areas, background noise
25 levels are typically in a range of 35 to 45 dB(A) (NRC 2013a). In areas where more
26 development has occurred, the surrounding community and highway noise results in baseline
27 noise levels around 60 to 65 dB(A) (NRC 2013a). Over time, the ambient noise levels at a
28 particular location can change as the area experiences changes in development. For example,
29 if new development activities that generate additional noise are initiated, then the ambient noise
30 levels in the area would increase.

31 Noise can be examined from the perspective of two different receptor groups: workers and the
32 general public. There are no Federal regulations for public exposure to noise. Impacts are
33 primarily evaluated in terms of adverse reactions of the public to noise. EPA has developed
34 guideline sound levels below which the general public should be protected from activity
35 interference and annoyance. For residential areas, EPA identified thresholds over a 24-hour
36 period of 45 dB(A) for indoor exposures and 55 dB(A) for outdoor exposures (EPA 1974). At
37 the Federal level, the Occupational Safety and Health Administration regulates noise

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1 exposure for workers. The permissible noise exposure limit varies by duration. The limit
2 ranges from 90 dB(A) for a duration of 8 hours per day to 115 dB(A) for 15 minutes or less
3 (29 CFR 1910.95).

4 Baseline noise characteristics would also include noise generated by spent fuel storage
5 activities. Noise has been assessed in various site-specific at-reactor ISFSI environmental
6 reviews such as the Calvert Cliffs ISFSI license renewal (NRC 2012b) for dry cask storage and
7 the GEH Morris ISFSI license renewal (NRC 2004) for pool storage. Activities that involve
8 construction equipment, such as decommissioning, generate the most ongoing noise, with
9 earthwork and excavation equipment noise levels exceeding 90 dB(A) (NRC 2002). Noise
10 associated with continued storage is primarily limited to mobile sources associated with the
11 movement of spent fuel between the spent fuel pool and the dry cask storage pad (see
12 NRC 2012b).

13 Proximity is a factor when assessing impacts because noise levels decrease as distance from
14 the source increases. Spent fuel storage facilities typically have large buffer areas between the
15 facility and the nearest receptor. In addition, other barriers such as buildings, vegetation, and
16 topography can also reduce noise levels.

17 **3.13 Aesthetics**

18 Aesthetic resources refer to the visual appeal of a tract of land. The scenic quality of an area
19 may include natural and man-made landscapes and the ways in which the two are integrated.
20 Aesthetic resources can include scenic viewsheds with waterbodies, topographic features, or
21 other visual landscape characteristics. The baseline for evaluation of impacts to aesthetic
22 resources is the existing visual condition of a site. Assessment of potential impacts to aesthetic
23 resources requires evaluation of the degree to which a project would contrast adversely with the
24 existing landscape. Section 2.1 provides a generic description of nuclear power plant sites and
25 storage facilities.

26 **3.14 Waste Management**

27 This subsection describes the various types of wastes generated by continued storage of spent
28 fuel.

29 **3.14.1 Low-Level Radioactive Waste**

30 Low-level waste (LLW) is radioactive material that (1) is not high-level radioactive waste, spent
31 fuel, or byproduct material (as defined in Section 11e(2) of the Atomic Energy Act of 1954 and
32 (2) is classified by the NRC, consistent with existing law, as low-level radioactive waste (as
33 defined in the Low-Level Radioactive Waste Policy Act, as amended).

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1 Almost all LLW generated from reactor operation, including spent fuel storage in pools and
2 ISFSIs, is shipped offsite, either directly to a disposal facility or to a processing center before
3 being sent to a disposal site. The number of shipments leaving each reactor site varies but
4 generally ranges from a few to about 100 per year. 10 CFR Part 20, Subpart K, discusses the
5 various means by which the licensees may dispose of their radioactive waste. The
6 transportation and land disposal of solid radioactive wastes are performed in accordance with
7 the applicable requirements of 10 CFR Part 71 and 10 CFR Part 61, respectively.

8 There are currently four operating disposal facilities in the United States that are licensed to
9 accept commercial-origin LLW. They are located in Barnwell, South Carolina; Richland,
10 Washington; Clive, Utah; and Andrews County, Texas. The facility in Utah, operated by
11 EnergySolutions, is licensed to accept only Class A LLW, whereas the other three facilities can
12 accept Class A, B, and C wastes (GAO 2004). In 2001, the South Carolina legislature imposed
13 restrictions on the Barnwell facility such that after June 2008, the facility can accept waste from
14 generators in only three States: South Carolina, New Jersey, and Connecticut. The Barnwell
15 facility is projected to close in 2038 (EnergySolutions 2012). The Richland facility accepts LLW
16 from only 11 States: Washington, Alaska, Hawaii, Idaho, Montana, Oregon, Utah, Wyoming,
17 Colorado, Nevada, and New Mexico. It is expected to close in 2056. The EnergySolutions
18 facility in Utah accepts only Class A waste, but the waste can come from any state. This facility
19 currently does not have a projected closing date. Waste Control Specialists, LLC, facility in
20 Texas accepts Class A, B, and C LLW from Texas and Vermont per the Texas Low-Level
21 Radioactive Waste Disposal Compact. Individual waste generators located outside of Texas
22 and Vermont may apply for an agreement to import non-Compact generated waste for disposal
23 at the Waste Control Specialists, LLC site. Currently, there is no projected closing date for this
24 facility.

25 Operating nuclear power plants, including activities associated with spent fuel storage, generate
26 LLW generally consisting of air filters, cleaning rags, protective tape, paper and plastic
27 coverings, discarded contaminated clothing, tools, equipment parts, and solid laboratory wastes
28 (all these are collectively known as dry active waste) and wet wastes that result during the
29 processing and recycling of contaminated liquids at the plants. Wet wastes generally consist of
30 spent demineralizer or ion exchange resins, and spent filter material from the equipment drain,
31 floor drain, and water cleanup systems. The wet wastes are generally solidified, dried, or
32 dewatered to make them acceptable at a disposal site (NRC 2013a).

33 The quantity of LLW generated by reactor operation, including spent fuel storage in spent fuel
34 pools, varies annually depending on the number of maintenance activities (NRC 2013a). A
35 pressurized water reactor, on average, generates approximately 300 m³ (10,600 ft³) and
36 1,000 Ci (3.7×10^{13} Bq) of LLW per year (Table 6.6 in NRC 2013a). The annual volume and
37 activity of LLW generated at a boiling water reactor are approximately twice the values indicated
38 for a pressurized water reactor. Approximately 95 percent of this waste is Class A (NEI 2013).

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1 After reactor operations have ceased, the number and types of activities generating LLW will
2 decrease. Therefore, the annual quantity of LLW generated from storage of spent fuel during
3 continued storage is expected to be a small fraction of that generated while the nuclear power
4 plant is operating because there are less waste generating activities occurring.

5 **3.14.2 Mixed Waste**

6 Wastes that are both radioactive and hazardous
7 are called mixed waste. These wastes are
8 regulated by the EPA or an authorized State for the
9 hazardous component, and by the NRC or an
10 agreement State for the radioactive component.
11 The types of mixed wastes generated in the
12 storage of spent fuel include organics (e.g., waste
13 oils and halogenated organics), metals (e.g., lead,
14 mercury, chromium, and cadmium), solvents,
15 paints, and cutting fluids.

16 The quantity of mixed waste generated by an
17 operating nuclear power plant is generally relatively
18 small (NRC 2013a). For example, the EIS for the
19 Fermi Unit 3 combined license application stated
20 that less than 0.5 m³/yr (0.65 yd³/yr) of mixed waste
21 would be generated during operation (NRC 2013c).

22 Because of the added complexity of dual
23 regulation, the management and disposal of mixed
24 waste is more problematic than for the other types
25 of wastes. Similar to hazardous waste, mixed
26 waste is generally accumulated onsite in
27 designated areas as authorized under the
28 Resource Conservation and Recovery Act (RCRA), and then shipped offsite for treatment as
29 appropriate and for disposal. The only disposal facilities that are authorized to receive mixed
30 LLW for disposal at present are the EnergySolutions and the Waste Control Specialists, LLC,
31 facilities as discussed in Section 3.14.1.

32 **3.14.3 Hazardous Waste**

33 Hazardous waste is defined by the EPA in 40 CFR Part 261, "Identification and Listing of
34 Hazardous Waste," as solid waste that (1) is listed by the EPA as being hazardous; (2) exhibits
35 one of the characteristics of ignitability, corrosiveness, reactivity, or toxicity; or (3) is not
36 excluded by the EPA from regulation as being hazardous. All aspects of hazardous waste

Other Waste Types Associated with Spent Fuel Storage

Mixed Waste: Waste that is both hazardous and radioactive.

Hazardous Waste: A solid waste or combination of solid wastes that, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may (1) cause or significantly contribute to an increase in mortality or an increase in serious irreversible or incapacitating reversible illness or (2) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed (as defined in the Resource Conservation and Recovery Act, as amended, 1976).

Nonradioactive Nonhazardous Waste: Waste that is neither radioactive nor hazardous.

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1 generation, treatment, transportation, and disposal are strictly regulated by the EPA or by the
2 States under agreement with the EPA per the regulations promulgated under RCRA.

3 The types of hazardous waste typically generated by nuclear power plants during storage
4 operations include waste paints, laboratory packs, and solvents. The quantities of these wastes
5 generated by an operating nuclear power plant can vary between facilities, but the quantities
6 generally are relatively small when compared with the quantities at most other industrial facilities
7 that generate hazardous waste (NRC 2013a). Nuclear power plants would likely accumulate
8 their hazardous waste onsite as authorized under RCRA and transport it to a treatment facility.
9 Residues remaining after treatment are sent to a permanent disposal facility. There are many
10 RCRA-permitted treatment and disposal facilities available throughout the United States.

11 **3.14.4 Nonradioactive, Nonhazardous Waste**

12 Similar to other industrial activity, the continued storage of spent fuel will generate wastes that
13 are not contaminated with either radionuclides or hazardous chemicals. These wastes include
14 trash, paper, wood, construction and demolition materials, and sanitary wastes (sewage). Solid
15 wastes, defined as nonhazardous by 40 CFR Part 261, are collected and disposed of in a local
16 landfill. Sanitary wastes may be treated onsite and the residues are sent to local landfills, or
17 discharged directly to a municipal sewage treatment facility. Sanitary waste may also be
18 collected in onsite septic tanks, which are emptied periodically, and then the waste is shipped to
19 a local sanitary waste treatment plant. The wastes and sewage are tested for radionuclides
20 before being sent offsite to ensure that no inadvertent contamination occurs. Offsite releases
21 from onsite sewage treatment plants are conducted under NPDES permits. As with operating
22 nuclear power plants, stormwater runoff may be collected and tested before it is discharged
23 offsite (NRC 2013a).

24 **3.14.5 Pollution Prevention and Waste Minimization**

25 Waste minimization and pollution prevention are important elements of operations at all nuclear
26 power plants and at-reactor ISFSIs. Licensees are required to consider pollution prevention
27 measures as dictated by the Pollution Prevention Act of 1990 and RCRA.

28 In addition, as noted in the License Renewal GEIS and in recent EISs for new reactors and
29 license renewal applications, licensees are likely to have waste minimization programs in place
30 that are aimed at minimizing the quantities of waste sent offsite for treatment or disposal.
31 Waste minimization techniques employed by the licensees may include source reduction and
32 recycling of materials either onsite or offsite. The establishment of a waste minimization
33 program is also a requirement for managing hazardous wastes under RCRA.

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1 **3.15 Transportation**

2 The affected environment for transportation associated with continued storage includes the
3 characteristics of the reactor site that support transportation activities, workers involved in
4 transportation activities, and the local, regional, and national transportation networks and
5 populations that use or live along these networks.

6 All nuclear power plants sites are serviced by controlled access roads. In addition to the access
7 roads, many of the plants also have railroad connections for moving heavy equipment and other
8 materials. Some of the plants that are located on navigable waters, such as rivers, Great
9 Lakes, or oceans, have facilities to receive and ship loads on barges (NRC 2013a). Power plant
10 sites provide a network of roads and sidewalks for vehicles and pedestrians as well as parking
11 areas for workers and visitors (NRC 2013a).

12 Local and regional transportation networks in the vicinity of nuclear power plant sites may vary
13 considerably depending on the regional population density, location, and size of local
14 communities, nature of economic development patterns, location of the region relative to
15 interregional transportation corridors, and land surface features, such as mountains, rivers, and
16 lakes. The impacts of employee commuting patterns on the transportation network in the
17 vicinity of nuclear power plants depend on the extent to which these factors limit or facilitate
18 traffic movements and on the size of the plant workforce that uses the network at any given
19 time. Impacts at the local level in the immediate vicinity of power plant sites vary depending on
20 the capacity of the local road network, local traffic patterns, and particularly the availability of
21 alternate routes for power plant workers. Given the rural locations of most power plant sites,
22 site traffic has a small impact on the local road system, since often there is not much other
23 traffic on local roads in the immediate vicinity of the plant. Because most sites have only one
24 access road, there may be congestion on this road at certain times, such as during shift
25 changes (NRC 2013a).

26 For transportation of radioactive material from a nuclear power plant site, the affected
27 environment includes all rural, suburban, and urban populations living along the transportation
28 routes within range of exposure to radiation emitted from the packaged material during normal
29 transportation activities or that could be exposed in the unlikely event of a severe accident
30 involving release of radioactive material. The affected environment also includes those
31 members of the public that could be exposed to radiation emitted from the packaged material
32 during normal transportation activities including people in vehicles on the same transportation
33 route, people living along transportation routes, and people at truck stops and workers that are
34 involved with the transportation activities.

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1 **3.16 Public and Occupational Health**

2 This section describes the affected environment during continued storage with respect to the
3 radiological protection of the public and workers. Public radiation doses from natural and
4 artificial sources other than spent fuel are also described. This section also describes the
5 regulatory framework for protection from occupational hazards.

6 **3.16.1 Radiological Exposure**

7 Nuclear power plants, spent fuel pools, and
8 at-reactor ISFSIs cause doses to members of the
9 public and onsite workers. The Atomic Energy Act
10 of 1954 requires the NRC to promulgate, inspect,
11 and enforce standards that provide an adequate
12 level of protection for public health and safety and
13 the environment. The NRC continuously evaluates
14 the latest radiation protection recommendations from
15 international and national scientific bodies to
16 establish the requirements for nuclear power plant
17 licensees. The NRC has established multiple layers
18 of radiation protection limits to protect the public
19 against potential health risks from exposure to
20 effluent discharges from nuclear power plant
21 operations. If the licensees exceed a certain fraction
22 of these dose levels in a calendar quarter, they are
23 required to notify the NRC, investigate the cause,
24 and initiate corrective actions within the specified
25 timeframe (10 CFR 20.2201 and 20.2203).

Definitions

- **Total effective dose equivalent (TEDE):** Sum of the effective dose equivalent (for external exposure) and the committed effective dose equivalent (for internal exposure).
- **Committed effective dose equivalent (CEDE):** Sum of the products of the weighting factors for body organs or tissues that are irradiated and the committed dose equivalent to these organs or tissues.
- **Deep dose equivalent:** Applies to external whole-body exposure and is the dose equivalent at a tissue depth of 1 cm (0.39 in.).

26 Nuclear power reactors and their associated spent fuel pools and ISFSIs in the United States
27 are licensed by the NRC and must comply with NRC regulations and conditions specified in the
28 license in order to operate. The licensees are required to comply with 10 CFR Part 20,
29 Subpart C, "Occupational Dose Limits for Adults," and 10 CFR Part 20, Subpart D, "Radiation
30 Dose Limits for Individual Members of the Public." Additionally, the EPA provides environmental
31 radiation protection standards for the uranium fuel cycle in 40 CFR Part 190.

32 **3.16.1.1 Regulatory Requirements for Occupational Exposure**

33 A plant licensee must maintain individual doses to workers within the 10 CFR 20.1201
34 occupational dose limits that are summarized in Table 3-2 and incorporate provisions to
35 maintain doses as low as is reasonably achievable. Under 10 CFR 20.2206, the NRC requires
36 licensees to submit an annual report of the results of individual monitoring carried out by the

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1 licensee for each individual for whom monitoring was required by 10 CFR 20.1502 during that
2 year. Annually, the NRC publishes a volume of the results of annual reporting of all licensees in
3 the publically available NUREG-0713, Volume 32, "Occupational Radiation Exposure at
4 Commercial Nuclear Power Reactors and Other Facilities 2010" (NRC 2012e).

5 **Table 3-2.** Occupational Dose Limits for Adults Established by 10 CFR Part 20

Tissue	Dose Limit ^(a)
Whole body or any individual organ or tissue other than the lens of the eye	More limiting of 5 rem/yr TEDE to whole body or 50 rem/yr sum of the deep dose equivalent and the committed dose equivalent to any individual organ or tissue other than the lens of the eye
Lens of the eye	15 rem/yr dose equivalent
Skin of the whole body, or skin of any extremity	50 rem/yr shallow dose equivalent

(a) See text box for definitions.
Note: To convert rem to sievert, multiply by 0.01.

6 Under 10 CFR 20.2202 and 20.2203, the NRC requires all licensees to submit reports of all
7 occurrences involving personnel radiation exposures that exceed certain control levels. The
8 control levels are used to investigate occurrences and to take corrective actions as necessary.
9 Depending on the magnitude of the exposure, reporting is required immediately, within
10 24 hours, or within 30 days.

11 **3.16.1.2 Regulatory Requirements for Public Exposure**

12 During continued storage in spent fuel pools, liquid, gaseous, and solid radioactive waste
13 management systems would be used to collect and treat the radioactive materials produced as
14 byproducts. These systems would process radioactive liquid, gaseous, and solid effluents to
15 maintain releases within regulatory limits and to levels as low as is reasonably achievable
16 before releasing them to the environment. Waste processing systems are designed to meet the
17 design objectives of 10 CFR Part 50, Appendix I, "Numerical Guides for Design Objectives and
18 Limiting Conditions for Operation to Meet the Criterion 'As Low as is Reasonably Achievable' for
19 Radioactive Material in Light-Water-Cooled Nuclear Power Reactor Effluents".

20 NRC regulations in 10 CFR 72.104 identify criteria for radioactive materials in effluents and
21 direct radiation from an ISFSI. These criteria include that, for normal operations and anticipated
22 occurrences, the annual dose equivalent to any real individual located beyond the controlled
23 area must not exceed 25 mrem (0.25 mSv) to the whole body, 75 mrem (0.75 mSv) to the
24 thyroid, and 25 mrem (0.25 mSv) to any other critical organ as a result of exposure to planned
25 discharges of radioactive materials, direct radiation, and any other radiation from uranium fuel

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1 cycle operations within the region. This regulation also requires that operational restrictions be
2 established to meet as low as is reasonably achievable objectives.

3 **3.16.2 Radiological Exposure from Naturally Occurring and Artificial Sources**

4 Table 3-3 identifies background doses to a typical member of the U.S. population. In the table,
5 the annual values are rounded to the nearest 1 percent. A total average annual effective dose
6 equivalent to members of the U.S. population (i.e., 620 mrem/yr) comes from two primary
7 sources: (1) naturally occurring background radiation and (2) medical exposure to patients.

8 **Table 3-3.** Average Annual Effective Dose Equivalent of Ionizing Radiation to a Member of the
9 U.S. Population for 2006

Source	Effective Dose Equivalent	
	mrem	Percent of Total
Ubiquitous background		
Radon and thoron	228	37
Natural		
Cosmic	33	5
Terrestrial	21	3
Internal	29	5
Total ubiquitous background	311	50
Medical		
Computed tomography	147	24
Nuclear medicine	77	12
Interventional fluoroscopy	43	7
Conventional radiography and fluoroscopy	33	5
Total medical	300	48
Consumer products	13	2
Industrial, security, medical, educational and research	0.3	0.05
Occupational	0.5	0.08
Total	624.8	100

Source: Adapted from NCRP 2009

10 Natural radiation sources other than radon result in 13 percent of the typical radiation dose
11 received. The larger source of radiation dose in ubiquitous background (37 percent) is from
12 radon, particularly because of homes and other buildings that trap radon and significantly
13 enhance its dose contribution over open-air living. The remaining 50 percent of the average

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1 annual effective dose equivalent consists of radiation mostly from medical procedures
2 (computed tomography, 24 percent; nuclear medicine, 12 percent; interventional fluoroscopy,
3 7 percent; and conventional radiography and fluoroscopy, 5 percent) and a small fraction from
4 consumer products (2 percent). The consumer product exposure category includes exposure to
5 members of the public from building materials, commercial air travel, cigarette smoking, mining
6 and agricultural products, combustion of fossil fuels, highway and road construction materials,
7 and glass and ceramic products. The industrial, security, medical, education, and research
8 exposure category includes exposure to the members of the public from nuclear power
9 generation; U.S. Department of Energy (DOE) installations; decommissioning and radioactive
10 waste; industrial, medical, education, and research activities; contact with nuclear medicine
11 patients; and security inspection systems. The occupational exposure category includes
12 exposure to workers from medical, aviation, commercial nuclear power, industry and commerce,
13 education and research, government, the DOE, and military installations. Radiation exposures
14 from occupational activities, industrial, security, medical, educational and research contribute
15 insignificantly to the total average effective dose equivalent.

16 **3.16.3 Occupational Hazards**

17 The Occupational Safety and Health Administration (OSHA) is responsible for developing and
18 enforcing workplace safety regulations. OSHA was created by the Occupational Safety and
19 Health Act of 1970, which was enacted to safeguard the health of workers. Facility conditions
20 that result in an occupational risk, but do not affect the safety of licensed radioactive materials,
21 are under the statutory authority of OSHA rather than the NRC as set forth in a Memorandum of
22 Understanding (53 FR 43950) between the NRC and OSHA. Regardless, occupational hazards
23 can be minimized when workers adhere to safety standards and use appropriate protective
24 equipment; however, fatalities and injuries from accidents can still occur.

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4.0 Environmental Impacts of At-Reactor Continued Storage of Spent Fuel

This chapter evaluates the environmental impacts of continued at-reactor storage of spent nuclear fuel (spent fuel) in a spent fuel pool or independent spent fuel storage installation (ISFSI). The U.S. Nuclear Regulatory Commission (NRC) evaluated the environmental impacts of at-reactor continued storage for three timeframes: short-term storage, long-term storage, and indefinite storage. Chapter 2 provides descriptions of the various activities that occur during continued storage. The environmental impacts of away-from-reactor ISFSI storage are evaluated in Chapter 5.

In the short-term storage timeframe, the NRC evaluates the impacts of continued storage of spent fuel for 60 years beyond the licensed life for operations of a reference reactor. The NRC assumes that all spent fuel has been transferred from the spent fuel pool to an ISFSI by the end of this 60-year timeframe. The NRC also assumes that a repository becomes available by the end of this 60-year timeframe.

Short-term storage of spent fuel for 60 years beyond licensed life for operations includes the following:

- continued storage of spent fuel in spent fuel pools (at-reactor only) and ISFSIs
- routine maintenance of spent fuel pools and ISFSIs (e.g., maintenance of concrete pads)
- handling and transfer of spent fuel from spent fuel pools to ISFSIs

The NRC then evaluates the impacts of continued storage for another 100 years after short-term storage. This 100-year timeframe is referred to as the long-term storage timeframe. In this timeframe, the draft *Waste Confidence Generic Environmental Impact Statement* (draft GEIS) assumes that a repository would become available by the end of the 100-year timeframe (160 years total continued storage after the end of the reactor's licensed life for operation).

Long-term storage activities include the following:

- continued storage of spent fuel in ISFSIs, including routine maintenance
- one-time replacement of ISFSIs and spent fuel canisters and casks
- construction and operation of a dry transfer system (DTS) (including replacement)

The NRC also evaluates the environmental impacts of a third timeframe that assumes a repository does not become available, thus requiring onsite storage in spent fuel pools until the

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Environmental Impacts of At-Reactor Continued Storage of Spent Fuel

1 end of the short-term storage timeframe and storage in ISFSIs indefinitely. The activities during
2 the indefinite storage timeframe are the same as those that would occur for long-term storage;
3 however, without a repository these activities occur repeatedly. Figure 1-1 provides a graphical
4 representation of the three timeframes.

5 Section 1.8.3 provides a list of the assumptions made in this draft GEIS regarding continued
6 storage. Impacts from decommissioning the spent fuel pool, ISFSI, and DTS are not evaluated
7 in this chapter but are considered in the cumulative impacts analysis in Chapter 6, as is spent
8 fuel transportation to a repository. Construction of a new spent fuel pool cooling system, to
9 support decommissioning, is also addressed in the cumulative impacts analysis. The
10 environmental impacts of operating a new cooling system during continued storage are bound
11 by the impacts of an operating reactor and are therefore not discussed further in this chapter.
12 The NRC assumes that the initial at-reactor ISFSIs would be constructed under a general or
13 site-specific license during the term of reactor operations (including license renewal); therefore,
14 the construction impacts of these initial at-reactor ISFSIs are not specifically analyzed in this
15 draft GEIS, but are taken into account in establishing the baseline affected environment
16 described in Chapter 3. These ISFSIs would, however, be subject to periodic relicensing
17 reviews and accompanying environmental reviews under the National Environmental Policy
18 Act of 1969 (NEPA). Further, the NRC assumes that the ISFSIs are completely replaced every
19 100 years. This replacement activity would require separate site-specific authorization from the
20 NRC before the start of any replacement activities. NRC authorization to relicense or replace
21 an ISFSI and NRC authorization to construct, operate, and replace a DTS are separate
22 licensing actions that would require an NRC review. They are considered Federal actions under
23 NEPA and would be undertakings under the National Historic Preservation Act (NHPA).

24 As discussed in Chapter 2, there are two existing away-from-reactor ISFSIs—the GEH Morris
25 and Three Mile Island Unit 2 (TMI-2) ISFSIs. However, as explained below, the environmental
26 impacts described in this chapter for at-reactor ISFSIs are representative of the impacts at both
27 of these away-from-reactor ISFSIs.

28 • The GEH Morris ISFSI is at the site of a spent fuel reprocessing facility (a production facility)
29 that was constructed by General Electric, but never operated. Because it was to be a
30 production facility licensed under siting and safety requirements similar to those for reactors
31 (e.g., Title 10 of the *Code of Federal Regulations* Part 50 [10 CFR Part 50], “Domestic
32 Licensing of Production and Utilization Facilities”), the GEH Morris facility is sited and
33 constructed in a manner substantially similar to a reactor spent fuel pool. In fact, it is
34 currently licensed to store 352 pressurized water reactor (PWR) fuel assemblies and
35 2,865 boiling water reactor (BWR) fuel assemblies, for a total of about 714 MTU, which is no
36 more than the licensed capacity of many BWR spent fuel pools. Therefore, the
37 environmental impacts described in the following chapters of this draft GEIS for at-reactor
38 spent fuel pools are representative of the impacts at the GEH Morris facility.

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Environmental Impacts of At-Reactors Continued Storage of Spent Fuel

1 • The TMI-2 ISFSI is a modified NUHOMS spent fuel storage system (designated
2 NUHOMS-12T) with 30 horizontal storage modules (DOE 2012). It was licensed by the
3 NRC in March 1999 and contains spent fuel from the damaged TMI-2 reactor (a single
4 reactor core). Although the NUHOMS-12T storage module contents are core debris (not
5 fuel assemblies) and the debris storage canisters could not be treated like fuel cladding, the
6 design of the NUHOMS-12T accounts for these technical differences. Each NUHOMS-12T
7 module provides for the horizontal dry storage of up to 12 TMI-2 stainless-steel canisters
8 inside a dry shielded canister, which is placed inside a concrete horizontal storage module.
9 The NUHOMS-12T modification includes venting of the dry shielded canister through high-
10 efficiency particulate air grade filters during storage. The vent system allows for release of
11 hydrogen gas, generated due to radiolysis, and monitoring and/or purging of the system
12 during operation (DOE 2012). The TMI-2 ISFSI is actually no larger than a typical at-reactor
13 ISFSI and meets the same NRC regulatory standards as at-reactor ISFSIs. Therefore, the
14 environmental impacts described in this chapter for at-reactor ISFSIs are representative of
15 the impacts at the TMI-2 ISFSI.

16 In this chapter, the NRC uses the License Renewal GEIS (NRC 2013) to inform some of the
17 impact determinations regarding continued storage. In many of these cases, the analysis in this
18 draft GEIS considers how the environmental impacts of continued storage compare to the
19 impacts considered in the License Renewal GEIS. In the License Renewal GEIS, the NRC
20 evaluated the potential impacts in each resource area by reviewing previous environmental
21 analyses for past license renewal reviews, scientific literature, and other available information.
22 Where appropriate, this draft GEIS also considers analyses and impact determinations made in
23 previous ISFSI licensing and renewal environmental assessments (EA) and environmental
24 impact statements (EISs) and in reactor license renewal and new reactor licensing EISs to
25 inform the impact determinations in this analysis.

26 Sections 4.1 through 4.17 evaluate the potential impacts on various resource areas, such as
27 land use, air quality, water quality, transportation, and public health. Sections 4.18 and 4.19
28 discuss accidents and terrorism. Section 4.20 provides a summary of the environmental
29 impacts and Section 4.21 contains the references. Within each resource area, the NRC has
30 provided an analysis of the potential impacts for the short-term storage timeframe, the long-term
31 storage timeframe, and indefinite storage and provided an impact determination—SMALL,
32 MODERATE, or LARGE—for each timeframe. The definitions of SMALL, MODERATE, and
33 LARGE are provided in Section 1.8.5. For some resource areas, the impact determination
34 language is specific to the authorizing regulation (e.g., “not likely to adversely impact” for
35 endangered species).

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Environmental Impacts of At-Reactor Continued Storage of Spent Fuel

1 **4.1 Land Use**

2 This section describes land-use impacts caused by the continued storage of spent fuel in spent
3 fuel pools and at-reactor ISFSIs.

4 **4.1.1 Short-Term Storage**

5 Spent fuel pool operations during the short-term storage timeframe would not require the use of
6 any land beyond that which was cleared and graded during nuclear power plant construction.
7 Continued operation of the spent fuel pool during short-term storage is not anticipated to require
8 new or additional monitoring or maintenance activities that would affect current land use. In
9 addition, inspection, testing, and surveillance activities that are conducted throughout the life of
10 spent fuel pools necessary to ensure compliance with Federal, State, and local requirements
11 regarding the environment and public safety are not expected to affect land-use conditions
12 (NRC 2013a).

13 As described in Section 3.1, most nuclear power plant sites have constructed at-reactor ISFSIs
14 for onsite dry cask storage of spent fuel. Dry cask storage at operating nuclear power plant
15 sites provides supplemental storage for portions of the spent fuel pool inventory. As further
16 described in Section 3.1, only a small fraction of the land committed for a nuclear power plant is
17 required to construct and operate an at-reactor ISFSI (see Table 3-1).

18 Operation of an ISFSI involves removing the spent fuel from spent fuel pools, packaging the
19 spent fuel in dry casks, and placing the dry casks on concrete storage pads. ISFSI operations
20 would not require the use of any land beyond that which was cleared and graded during facility
21 construction. The ISFSI would be surrounded by security fencing to restrict and control access
22 in accordance with requirements for the protection of stored spent fuel in 10 CFR 73.51. Only a
23 small portion of the land committed for a nuclear power plant is required for an at-reactor ISFSI
24 (see Table 3-1). Therefore, access restrictions associated with operation of an ISFSI during the
25 short-term storage timeframe would affect only a small amount of land within the larger nuclear
26 plant site.

27 ISFSIs are designed as passive systems that require no power or regular maintenance other
28 than routine visual inspections and checks of the cask ventilation system (e.g., for blockages of
29 ducts). Continued operation of an at-reactor ISFSI is not anticipated to require new or additional
30 maintenance activities that would affect current land use. The NRC has prepared several EAs
31 for site-specific licenses for construction and operation of at-reactor ISFSIs (NRC 2012a, 2005a,
32 2003, and 1992).

33 Based on the assessment above, 60 years of continued at-reactor storage in a spent fuel pool
34 or at-reactor ISFSI would not require disturbance of any new land at a nuclear power plant or
35 result in operational or maintenance activities that would change the current land use.

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Environmental Impacts of At-Reactor Continued Storage of Spent Fuel

1 Therefore, the NRC concludes that the potential environmental impact on land use would be
2 SMALL during the short-term storage timeframe.

3 **4.1.2 Long-Term Storage**

4 The potential environmental impacts on land use from long-term storage in an ISFSI would be
5 similar to those described for short-term storage. Only a small fraction of the land committed for
6 a nuclear power plant is required for an ISFSI (see Table 3-1). Operation and maintenance of
7 an ISFSI would not require the use of any land beyond that which was already cleared and
8 graded during facility construction. Access restrictions associated with operation of an ISFSI
9 during the long-term storage timeframe would affect only a small amount of land within the
10 larger nuclear plant site.

11 During long-term storage, in addition to routine maintenance and monitoring, the NRC assumes
12 that a DTS is constructed and operated to facilitate the transfer, handling, and repackaging of
13 spent fuel after the end of the short-term timeframe. As described in Section 2.1.4, the
14 reference DTS considered in this draft GEIS consists of two major structures: (1) a two-level
15 concrete and steel structure that provides confinement and shielding during fuel transfer,
16 handling, and repackaging operations; and (2) an attached, single-level steel building for receipt
17 and handling of the spent fuel shipping casks. These two major structures would be
18 constructed on a reinforced-concrete basemat that would occupy about 0.04 ha (0.1 ac).
19 Maintenance and monitoring activities associated with a DTS would include routine inspections
20 and testing of the spent fuel and cask transfer and handling equipment (e.g., lift platforms and
21 associated mechanical equipment) and process and effluent radiation monitoring, which do not
22 require the use of any land beyond that which would be cleared and graded during DTS
23 construction.

24 As described in Section 3.1, the physical area required for operating a commercial nuclear
25 power plant site ranges from 34 ha (84 ac) to 5,700 ha (14,000 ac) (NRC 2013a). Therefore,
26 only a small fraction of the land committed for a nuclear power plant would be required to
27 construct and operate a DTS. Once the DTS is constructed, access to the facility site would be
28 restricted, in accordance with 10 CFR Part 73, to activities that support facility operations. The
29 restricted access area for the reference DTS described in Section 2.1.4 is about 0.7 ha (2 ac).

30 The NRC assumes that the at-reactor ISFSI and DTS would be replaced during the long-term
31 storage timeframe. The number of storage casks that would be replaced and the size of the
32 replacement concrete storage pad would depend on the remaining inventory of spent fuel to be
33 transported to a permanent repository after the 100-year timeframe. The replacement facilities
34 for the at-reactor ISFSI and DTS would likely be constructed on land near the existing facilities.

35 Long-term storage of spent fuel at an at-reactor ISFSI would not result in operational or
36 maintenance activities that would change land-use conditions. Construction and operation of a

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Environmental Impacts of At-Reactor Continued Storage of Spent Fuel

1 DTS and replacement of the ISFSI and DTS would affect a small fraction of the land already
2 committed for a nuclear power plant. Therefore, the NRC concludes that the environmental
3 impacts on land use during the long-term storage timeframe would be SMALL.

4 **4.1.3 Indefinite Storage**

5 This section describes the potential environmental impacts on land use if a repository is not
6 available to accept spent fuel. For this analysis, the NRC assumes that spent fuel would
7 continue to be stored in at-reactor ISFSIs indefinitely. The potential environmental impacts on
8 land use from indefinite storage would be similar to those described for long-term storage.

9 Aging management is assumed to include replacement of the ISFSI and DTS every 100 years
10 and necessitate repackaging of spent fuel at a DTS. Replacement of the ISFSI and DTS would
11 occur on land near existing facilities. The older ISFSI and DTS would be demolished, and the
12 land reclaimed by the licensee.

13 Access to the ISFSI and DTS would be restricted to activities that support facilities operations in
14 accordance with 10 CFR Part 73. Restricted access under the indefinite storage timeframe
15 would result in land that would not be available for other productive land uses for an indefinite
16 amount of time. However, as noted previously, only a small portion of the land already
17 committed for a nuclear power plant is required for an at-reactor ISFSI and DTS. Therefore, the
18 amount of land that would not be available for other land uses under the indefinite storage
19 timeframe would be small.

20 Indefinite storage of spent fuel in at-reactor ISFSI facilities would not result in operational or
21 maintenance activities that would change land-use conditions. Construction of a DTS and
22 replacement of the ISFSI and DTS every 100 years would affect a small fraction of the nuclear
23 plant site. After replacement, the older ISFSI and DTS would be demolished and the land would
24 be reclaimed. Therefore, the NRC concludes that the environmental impacts on land use from
25 indefinite storage would be SMALL.

26 **4.2 Socioeconomics**

27 This section describes the socioeconomic factors that could be directly or indirectly affected by
28 continued storage of spent fuel in spent fuel pools and at-reactor ISFSIs. Changes in
29 employment and tax payments caused by continued storage can have a direct and indirect
30 effect on public services and housing demand, as well as traffic volumes in the communities in
31 the region around each nuclear power plant site. As discussed in Chapter 3, the socioeconomic
32 region of influence is where spent fuel storage workers and their families reside, spend their
33 income, and use their benefits, thus directly and indirectly affecting the economic conditions of
34 the region.

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Environmental Impacts of At-Reactor Continued Storage of Spent Fuel

1 **4.2.1 Short-Term Storage**

2 During the short-term storage timeframe, some systems used during reactor operations would
3 remain in operation to ensure spent fuel pool cooling prior to the transfer of spent fuel from the
4 pools to an at-reactor ISFSI. A small number of workers—likely between 20 and 85—would
5 continue to maintain, monitor, and transfer spent fuel from spent fuel pools to at-reactor ISFSIs
6 after the cessation of reactor operations. A small number of workers (30–35) would also
7 continue to maintain and monitor the at-reactor ISFSI. Because the existing storage workforce
8 would continue to monitor and maintain storage facilities after reactor operations cease, there
9 would be no need for any additional spent fuel pool and at-reactor operations workers.¹
10 Therefore, during the short-term timeframe, there would be no increase in population or demand
11 for housing and public services because of continued storage. Activities associated with short-
12 term storage are also not likely to affect local transportation conditions in the vicinity of the
13 continued storage site. Transportation activities would continue into the period of continued
14 storage at a reduced magnitude consistent with diminishing onsite activities and operations.

15 The amount of tax payments during the short-term storage timeframe would depend on a
16 number of factors, including State tax law and established tax payment agreements with local
17 tax authorities. Property tax and other payments, including the portion for at-reactor spent fuel
18 storage, would continue, although the amount of tax payments would likely be reduced after
19 reactor operations cease. Nevertheless, the amount of tax payments related to continued
20 storage is not expected to change during the short-term timeframe.

21 The socioeconomic effects of reactor operations have become well established as regional
22 socioeconomic conditions have adjusted to the presence of the nuclear power plant. During the
23 period of reactor operations local communities have adjusted to fluctuations in workforce
24 caused by regularly scheduled refueling and maintenance outages (NRC 2013a). By
25 comparison, the contributory effect on socioeconomic conditions from continued short-term
26 spent fuel storage would be SMALL, because of (1) the small number of workers required to
27 maintain and monitor spent fuel storage in pools or an at-reactor ISFSI,(2) the continuation of
28 tax payments, and (3) no increased demand for housing and public services. To the extent that
29 State and local taxes paid by the licensee might drop during the short-term storage timeframe,
30 the reduction would be attributable to the cessation of reactor operations and the reduced value
31 of the facility rather than to continued storage. Therefore, the socioeconomic impacts of
32 continued onsite storage during the short-term timeframe would be SMALL.

¹ Typically shutdown units that are co-located with operating units either have a small dedicated staff or have workers from the operating units assigned and dedicated to the shutdown unit (e.g., spent fuel pool maintenance and monitoring activities).

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Environmental Impacts of At-Reactor Continued Storage of Spent Fuel

1 **4.2.2 Long-Term Storage**

2 As discussed in Section 2.1.4, in contrast to short-term storage, long-term storage of spent fuel
3 would require the construction and operation of a DTS and replacement of the DTS and ISFSI.
4 The construction of a DTS and replacement at-reactor ISFSI would require a much smaller
5 workforce than required for nuclear power plant construction or extended maintenance and
6 refueling outages. As discussed in Section 3.2 of this draft GEIS, the construction workforce for
7 an at-reactor ISFSI ranged from approximately 20 to 60 workers over approximately 1 year.
8 The DTS is a two-level concrete and steel structure with an attached single-level, weather-
9 resistant, pre-engineered steel building on 0.04 ha (0.1 ac). With regard to the workforce
10 required for the construction of the DTS, the NRC reviewed a proposal to construct and operate
11 a 3.2-ha (8-ac) spent fuel transfer facility at the Idaho National Laboratory (NRC 2004b). The
12 proposal estimated 250 construction workers would be employed for 2 years. Given that the
13 INL facility is an estimated 80 times larger than the Transnuclear Inc.-Electric Power Research
14 Institute (TN-EPRI) DTS design, the NRC estimates that no more than 60 to 80 short-term
15 construction workers would be needed for between 1 to 2 years to build the DTS and at-reactor
16 ISFSI pad. The construction workforce would likely comprise local workers. Given the
17 availability of housing in the vicinity of all existing nuclear power plant sites and relatively few
18 construction workers required for the project, the NRC concludes that nonlocal workers would
19 be able to rely on temporary housing and not increase the demand for permanent housing.

20 Similar to short-term storage, a small number of workers (30–35) would continue to maintain
21 and monitor the storage of spent fuel in the at-reactor ISFSI. The ISFSI workforce requirements
22 would remain unchanged from the period of nuclear reactor operations. Because there would
23 be no need for any additional at-reactor ISFSI operations workers during the long-term
24 timeframe, there would be no increase in population or demand for housing or public services.
25 In addition, activities associated with long-term storage are also not likely to affect local
26 transportation conditions in the vicinity of the continued storage site.

27 Similar to the short-term timeframe, the amount of overall tax payments during long-term
28 storage would depend on a number of factors, including State tax law and established tax
29 payment agreements with local tax authorities. Property tax and other payments, including the
30 portion for continued at-reactor storage, would continue during the long-term storage timeframe.
31 Similar to short-term storage, the amount of tax payments would be reduced after reactor
32 operations cease. The replacement of the at-reactor ISFSI and construction, operation, and
33 subsequent replacement of the DTS could be viewed as property improvements by local tax
34 assessors causing the property tax payment to be increased. Overall, construction activities are
35 expected to have a minor effect on the local economy. Nevertheless, the amount of tax
36 payments related to continued storage is not expected to change during the long-term
37 timeframe.

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Environmental Impacts of At-Reactor Continued Storage of Spent Fuel

1 As previously noted for short-term storage, regional socioeconomic conditions have become
2 well established during the period of reactor operations for all nuclear power plants (NRC 2013).
3 By comparison, the contributory effect from long-term storage would be SMALL for all
4 socioeconomic categories because (1) relatively few workers will be required to maintain and
5 monitor spent fuel storage, construct and operate a DTS, and replace the at-reactor ISFSI and
6 DTS; (2) construction activities will be of short duration; (3) continued tax payments will remain
7 relatively constant at post-reactor operations level; and (4) there will be no increased demand
8 for housing and public services. Therefore, the NRC concludes that the socioeconomic impacts
9 of continued storage during the long-term timeframe would be SMALL.

10 **4.2.3 Indefinite Storage**

11 This section describes the socioeconomic impacts if a repository is not available to accept spent
12 fuel from an existing nuclear power plant site. With no repository available, the aging
13 management program would continuously monitor and maintain an at-reactor ISFSI. Impacts
14 from indefinite storage would be similar to those described for the long-term storage timeframe.
15 The NRC assumes the ISFSI pads and DTS would be replaced every 100 years and that this
16 would require a small continuous workforce. Property tax revenue would remain relatively
17 constant while spent fuel remains stored onsite. Therefore, the socioeconomic impacts from
18 indefinite onsite storage of spent fuel in at-reactor ISFSIs would be SMALL.

19 **4.3 Environmental Justice**

20 This section describes the impacts on minority and low-income populations living in the vicinity
21 of nuclear power plant sites resulting from the continued onsite storage of spent fuel in spent
22 fuel pools and at-reactor ISFSIs.

23 The NRC strives to identify and consider environmental justice issues in agency licensing and
24 regulatory actions primarily by fulfilling its NEPA responsibilities for such actions. Under
25 Executive Order 12898 (59 FR 7629), Federal agencies are responsible for identifying and
26 addressing potential disproportionately high and adverse human health and environmental
27 impacts on minority and low-income populations. Environmental justice refers to a Federal
28 policy that ensures that minority, low-income, and tribal communities that have historically been
29 excluded from environmental decision-making are given equal opportunities to participate in
30 decision-making processes.

31 In 2004, the Commission issued a Policy Statement on the Treatment of Environmental
32 Justice Matters in NRC Regulatory and Licensing Actions (69 FR 52040), which states, "The
33 Commission is committed to the general goals set forth in Executive Order 12898, and strives
34 to meet those goals as part of its National Environmental Policy Act (NEPA) review process."
35 In addition, the Commission stated in its decision on the Private Fuel Storage (PFS) facility

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1 application that environmental justice, as applied at the NRC, “means that the agency will make
2 an effort under NEPA to become aware of the demographic and economic circumstances of
3 local communities where nuclear facilities are to be sited, and take care to mitigate or avoid
4 special impacts attributable to the special character of the community” (NRC 2002a, 2004b).

5 Potential impacts on minority and low-income populations as the nuclear power plant transitions
6 from reactor operations to decommissioning and continued storage would mostly consist of
7 radiological (human health) and socioeconomic (environmental) effects. During continued
8 storage, the incremental radiation dose from spent fuel stored in spent fuel pools and at-reactor
9 ISFSIs is expected to remain unchanged from the period of reactor operations and within
10 regulatory limits (see Section 4.17). Radiological and environmental monitoring programs,
11 similar to those implemented during nuclear power plant operations, would ensure that the
12 radiation dose from continued spent fuel storage would remain within regulatory limits. In
13 addition, socioeconomic conditions affected by the continued storage of spent fuel as they relate
14 to minority and low-income populations living near nuclear power plant sites would remain
15 unchanged.

16 As discussed in Section 3.3, the special pathway receptors analysis is an important part of the
17 environmental justice analysis because consumption patterns may reflect the traditional or
18 cultural practices of minority and low-income populations in the area of the continued storage
19 site, such as migrant workers or Native Americans. All NRC licensees have to assess the
20 impact of facility operations on the environment through their radiological environmental
21 monitoring programs (REMPs). These programs assess the effects of site operations on the
22 environment that could affect special pathway receptors. However, once reactor operations
23 cease, the REMP would be modified to consider only the potential sources of radiation and
24 radioactivity that may be released from a spent fuel pool or at-reactor ISFSIs. Air monitoring,
25 thermoluminescent dosimeters, and groundwater monitoring would likely be used to detect
26 releases from the spent fuel pools and at-reactor ISFSI, but collection of other environmental
27 sampling data would depend on site-specific conditions (e.g., proximity to surface waterbody).

28 In most cases, NRC environmental justice analyses are limited to evaluating the human health
29 effects of the proposed licensing action and the potential for minority and low-income
30 populations to be affected. Environmental justice-related issues as well as demographic
31 conditions (i.e., the presence of potentially affected minority and low-income populations) differ
32 from site to site, and environmental justice issues and concerns usually cannot be resolved
33 generically with regard to NRC licensing actions. In its site-specific reviews, the NRC
34 addresses environmental justice issues and concerns during each environmental review for
35 licensing actions by identifying potentially affected minority and low-income populations. The
36 NRC identifies minority and low-income populations by examining any potential human health
37 or environmental effects on these populations to determine if these effects may be
38 disproportionately high and adverse. Resource areas that might create human health and other

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1 environmental impacts include, but are not limited to air quality, land use, and water and
2 ecological resources. Consequently, environmental justice, as well as other socioeconomic
3 issues, are normally considered in site-specific environmental reviews (69 FR 52040).

4 In the present case, however, the NRC has determined that it can provide an assessment of the
5 environmental justice impacts during continued storage compared to environmental justice
6 impacts of storage during reactor operations. As previously stated in Chapters 2 and 3, this
7 draft GEIS and the Waste Confidence rule are not licensing actions and do not authorize the
8 continued storage of spent fuel. The environmental analysis in this draft GEIS fulfills a small
9 part of the NRC's NEPA obligation with respect to the licensing or relicensing of a nuclear
10 reactor or spent fuel storage facility. Further, the site-specific NEPA analysis that is required
11 prior to an NRC licensing action will include a discussion of the impacts on minority and low-
12 income populations, and will appropriately focus on the NRC decision directly related to specific
13 licensing actions. As with all other resource areas, this site-specific analysis will allow the NRC
14 to make an impact determination with respect to environmental justice for each NRC licensing
15 action. A generic determination of the human health and environmental effects impacts during
16 continued storage is possible because the NRC understands how the environmental impacts
17 change when a nuclear power plant site transitions from reactor operations to continued
18 storage. Based on this knowledge, the NRC can provide an assessment of the potential human
19 health and environmental effects during continued storage. As discussed in the following
20 sections, the NRC has determined that the human health and environmental effects from
21 continued storage would be small compared to the impacts that are normally experienced
22 during reactor operations.

23 **4.3.1 Short-Term Storage**

24 As previously explained in Section 4.2.1 (socioeconomics—short term), the socioeconomic
25 effects of reactor operations have become well established because regional socioeconomic
26 conditions will have adjusted to the presence of the nuclear power plant (NRC 2013a). After the
27 cessation of reactor operations, a small number of workers (15–85) would continue to maintain
28 and monitor spent fuel pools. These workers would also transfer spent fuel from spent fuel
29 pools to at-reactor ISFSIs. Once all of the spent fuel is transferred from the spent fuel pools to
30 dry cask storage, spent fuel pool storage operations worker positions would be eliminated. For
31 at-reactor ISFSIs, a small number of workers (30–35) would be needed to maintain and monitor
32 the at-reactor ISFSI. Consequently, ~~employment opportunities for socioeconomic impacts due~~
33 ~~to continued storage would remain unaffected be unchanged in comparison to the period of~~
34 ~~reactor operations~~ for minority and low-income populations.

35 Generally, the continued maintenance and radiological monitoring associated with spent fuel
36 storage, either in spent fuel pools or at-reactor ISFSIs, during the short-term timeframe ensures
37 that any human health and environmental effects would remain within regulatory limits for the
38 general population. Based on a review of recent REMP reports, human health impacts would

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1 not be expected in special pathway receptor populations living near a nuclear power plant site
2 as a result of subsistence consumption of water, local food, fish, and wildlife during the
3 short-term timeframe. A modified REMP would remain in effect after the nuclear power plant
4 ceases operations through the short-term timeframe. Monitoring would ensure that radiological
5 doses would remain within regulatory limits and minority and low-income populations would
6 experience no new human health and environmental effects during the short timeframe beyond
7 what had already been experienced during reactor operations.

8 As previously discussed for the other resource areas in Chapter 4, the overall contributory
9 human health and environmental effects from continued short-term spent fuel storage would be
10 limited in scope and SMALL for all populations. ~~Upon detection, licensees would take corrective~~
11 ~~action to contain the leak and treat the affected groundwater.~~ Therefore, minority and low-
12 income populations are not expected to experience disproportionately high and adverse human
13 health and environmental effects from the continued short-term storage of spent fuel. In
14 addition, as indicated in the NRC policy statement, the potential for environmental justice
15 impacts would also be considered during the environmental reviews for specific licensing
16 actions associated with each particular storage facility (69 FR 52040).

17 **4.3.2 Long-Term Storage**

18 In addition to monitoring and maintenance, long-term storage includes the construction and
19 operation of a DTS and replacement of the at-reactor ISFSI and DTS. Construction and
20 operation of a DTS would constitute a federal action under NEPA and site-specific analysis
21 would include an analysis of the potential effects on minority and low-income populations.
22 NRC environmental justice analyses are generally limited to evaluating the human health and
23 environmental effects of the proposed licensing action and the potential for minority and low-
24 income populations to be disproportionately affected. As stated in the NRC policy statement,
25 environmental justice assessments would be performed as necessary in the underlying
26 licensing action for each particular facility (69 FR 52040). DTS license reviews would not rely
27 on the analysis in this draft GEIS, because the site-specific NEPA analysis would consider the
28 site-specific impacts on minority and low-income populations.

29 Potential impacts on minority and low income populations from the construction, operation, and
30 replacement of the DTS and at-reactor ISFSI would mostly consist of environmental and
31 socioeconomic effects during construction (e.g., noise, dust, traffic, employment, and housing
32 impacts). Noise and dust impacts during construction would be short term and primarily limited
33 to onsite activities. Minority and low income populations residing along site access roads could
34 be directly affected by increased commuter vehicle and truck traffic. However, because of the
35 temporary nature of construction and the relatively low numbers of workers (60–80 short-term
36 construction workers), these effects are likely to be minimal and limited in duration. Increased
37 demand for rental housing during construction could cause rental costs to rise temporarily,
38 disproportionately affecting low-income populations living near the site who rely on inexpensive

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1 housing. However, given the short duration of construction (1–2 years), the relatively small
2 number of workers needed, and the proximity of some nuclear power plant sites to metropolitan
3 areas, it is expected that many of the workers would commute to the construction site, thereby
4 reducing the need for rental housing. Based on this information and the analysis of human
5 health and environmental impacts presented in this chapter, the construction of the DTS and
6 replacement of the ISFSI would not have disproportionately high and adverse human health and
7 environmental effects on minority and low-income populations. Similar to the short-term
8 storage, a small number of workers (30–35) would be needed to maintain and monitor the
9 at-reactor ISFSI after cask transfers to the replacement facility. Consequently, employment
10 opportunities, although reduced ~~for from~~ reactor operations, would remain unaffected for
11 minority and low-income populations. Based on this information, there would be no
12 disproportionately high and adverse human health and environmental effects on minority and
13 low-income populations from the construction and operation of the DTS and replacement of the
14 DTS and at-reactor ISFSI.

15 For long-term spent fuel storage, REMPs, similar to those implemented during nuclear power
16 plant operations and short-term storage, would ensure that the radiation dose from DTS
17 operations and continued spent fuel storage would remain within regulatory limits. Similar to
18 short-term storage, a modified REMP would be in place to ensure that radiological doses remain
19 within regulatory limits and minority and low-income populations would experience no new
20 human health and environmental effects during the long-term timeframe beyond those
21 experienced during reactor operations.

22 The continued maintenance and monitoring of spent fuel in at-reactor ISFSIs would have
23 minimal human health and environmental effects on minority and low-income populations near
24 these storage facilities. As previously discussed for the other resource areas in Chapter 4, the
25 overall contributory human health and environmental effects from continued long-term spent fuel
26 storage would be limited in scope and SMALL for all populations, except for historic and cultural
27 resources where impacts could be SMALL, MODERATE, or LARGE. The magnitude of adverse
28 effect on historic properties and the impact on historic and cultural resources largely depends on
29 what resources are present, the extent of proposed land disturbance, if the area has been
30 previously surveyed to identify historic and cultural resources, and if the licensee has
31 management plans and procedures that are protective of historic and cultural resources. The
32 site-specific environmental review and compliance with the NHPA process could identify historic
33 properties, adverse effects, and potentially address adverse effects on historic properties and
34 impacts on other historic and cultural resources. Thus, the potential impacts on historic and
35 cultural resources could be SMALL, MODERATE, or LARGE depending on site-specific factors.
36 However, measures such as implementation of historic and cultural resource plans and
37 procedures, agreements, and license conditions can be used to avoid, minimize, or mitigate
38 adverse effects on historic properties and impacts on historic and cultural resources. Minority
39 and low-income populations are not expected to experience disproportionately high and adverse

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1 human health and environmental effects from the continued long-term storage of spent fuel. In
2 addition, as indicated in the NRC policy statement, the potential for environmental justice
3 impacts would be considered during the environmental reviews for specific licensing actions
4 associated with each particular storage facility (69 FR 52040).

5 **4.3.3 Indefinite Storage**

6 This section describes the environmental impacts on minority and low-income populations if a
7 repository is not available to accept spent fuel. With no repository available, the aging
8 management program would continuously monitor and maintain an at-reactor ISFSI. Impacts
9 from indefinite onsite storage would be similar to those described in Section 4.3.2.

10 The indefinite maintenance and monitoring of spent fuel in at-reactor ISFSIs would have
11 minimal human health and environmental effects on minority and low-income populations near
12 these storage facilities. As previously discussed for the other resource areas in Chapter 4, the
13 overall contributory human health and environmental effects from the indefinite storage of spent
14 fuel storage would be limited in scope and SMALL for all populations, except for historic and
15 cultural resources where impacts could be SMALL, MODERATE, or LARGE. If replacement
16 activities occur in previously disturbed areas (i.e., in areas that have previously experienced
17 construction impacts) then impacts on historic and cultural resources would be SMALL.
18 Therefore, historic properties would not be adversely affected. If construction activities occur in
19 previously undisturbed areas or avoidance is not possible, then there could be adverse effects
20 on historic properties, and impacts on historic and cultural resources could be SMALL,
21 MODERATE, or LARGE depending on site-specific factors. Minority and low-income
22 populations are not expected to experience disproportionately high and adverse human health
23 and environmental effects from the indefinite storage of spent fuel. In addition, as indicated in
24 the NRC policy statement, the potential for environmental justice impacts would be considered
25 during the environmental reviews for specific licensing actions associated with each particular
26 storage facility (69 FR 52040).

27 **4.4 Air Quality**

28 This section describes impacts on air quality caused by continued storage in spent fuel pools
29 and at-reactor ISFSIs. Because there would be no increase in emissions during continued
30 storage, the requirements for a conformity determination under 40 CFR Part 93 do not apply to
31 the operation of a spent fuel pool or an at-reactor ISFSI. The requirements for a conformity
32 determination with respect to the replacement of an ISFSI and the construction, operation, and
33 replacement of a DTS are considered in the long-term storage section (Section 4.4.1).

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1 **4.4.1 Short-Term Storage**

2 Once reactor operations cease and continued storage begins, most pollutant-generating
3 activities at the nuclear power plant site would either cease or continue at lower levels.
4 Therefore, as described following, the environmental impacts on air quality during continued
5 storage would be less than the impacts during reactor operations.

6 The License Renewal GEIS concluded that impacts for continued power-generation operations
7 in attainment, nonattainment, and maintenance areas are SMALL for all plants, at least in part
8 because licensees would be required to operate within State permit requirements (NRC 2013).
9 Specifically, the License Renewal GEIS analyzes a number of specific activities related to
10 continued power-generation operations that result in emissions of air pollutants. These include
11 testing of emergency diesel generators, use of fossil-fuel boilers (for evaporator heating, plant
12 space heating, and feed water purification), testing of fossil-fuel-fired fire pumps, cooling-tower
13 drift, and transmission-line emissions. When the nuclear power plant ceases operations and the
14 site enters the short-term storage timeframe, many of these activities will also cease. For
15 example, testing requirements may be reduced or eliminated for emergency diesel generators
16 once the reactor is permanently shutdown. Also, cooling towers would no longer be rejecting up
17 to two-thirds of the thermal power of a reactor, which would dramatically reduce cooling-tower
18 drift. Because emissions of air pollutants resulting from continued storage of spent fuel in either
19 spent fuel pools or at-reactor ISFSIs would be substantially smaller than air emissions during
20 power generation, air quality impacts from continued storage would also be minor.

21 Routine maintenance and monitoring activities at the at-reactor ISFSI would occur during short-
22 term storage. Because dry cask storage systems do not have active systems (e.g., diesel
23 generators), these activities do not involve significant releases of air pollutants.

24 Thermal releases from the at-reactor ISFSI will cause some local atmospheric heating.
25 Downwind from an ISFSI, ambient temperatures can increase by 2.1°C (3.8°F) at 1 km (0.6 mi)
26 to 0.1°C (0.2°F) at 10 km (6.2 mi) from the site (NRC 1984). Temperature changes this small
27 could not be differentiated from temperature changes that naturally occur, such as from
28 passage of the sun throughout the day and passing clouds. Over time, the spent fuel in the
29 casks will cool and less heat will be released resulting in less local atmospheric heating. The
30 heat released by storing dry casks on the surface should be distinguished from the greenhouse
31 gas emissions discussed in Section 4.5 of this draft GEIS. Heat released from a dry cask is a
32 local phenomenon, whereas greenhouse gases released into the atmosphere potentially
33 contribute to impacts beyond the local environment.

34 Because emissions of air pollutants resulting from short-term continued storage of spent fuel
35 would be substantially smaller than air emissions during power generation, which was
36 determined to have SMALL impacts in the License Renewal GEIS, the NRC concludes the

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- 1 impacts associated with continued spent fuel storage would be SMALL for all location
- 2 classifications (i.e., attainment, nonattainment, and maintenance). Further, the impact from heat
- 3

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1 released to the atmosphere from ISFSIs would be SMALL because the small variations in
2 downwind temperatures caused by heat released from the ISFSI would not be different from
3 natural temperature fluctuations.

4 **4.4.2 Long-Term Storage**

5 As noted in Section 1.8, all the spent fuel would be moved out of the spent fuel pool and into
6 at-reactor dry cask storage by the beginning of this timeframe. Routine maintenance and
7 monitoring activities at the at-reactor ISFSI would continue during long-term storage. Because
8 dry cask storage systems ~~to do~~ not have active systems (e.g., diesel generators), these
9 activities do not involve significant releases of air pollutants. As described in Section 1.8.3, the
10 NRC assumes that the ISFSI needs to be replaced and the fuel repackaged during this
11 timeframe. The licensee must construct a DTS to facilitate the transfer of the spent fuel to new
12 casks. The draft GEIS also assumes that the DTS is replaced once during the long-term
13 storage timeframe.

14 The construction and replacement of a DTS would involve onsite fabrication involving heavy
15 equipment (earthmoving, concrete batch plant, cranes, etc.), which would cause emissions of
16 air pollutants. Given the relatively smaller size of the DTS compared to an at-reactor ISFSI, the
17 time, materials, and equipment required to build the DTS would be no more than those used to
18 construct an ISFSI. The NRC previously determined that the environmental impact on air
19 quality from construction of the Diablo Canyon ISFSI, which would hold up to 140 dry storage
20 casks from two reactors on a 2-ha (5-ac) site and would be larger than the reference DTS,
21 would be minimal (NRC 2003). Therefore, the air emissions and impacts on air quality for
22 construction and replacement of the DTS would also be minimal. The DTS relies on electrical
23 power for operations. As a result, there are no routine emissions of air pollutants from the DTS
24 during operations, such as might occur from a boiler or diesel generator. A diesel generator
25 could be used as a source of backup electrical power. Testing and use of a backup diesel
26 generator would be infrequent and would cause emissions no greater than those caused by
27 emergency diesel generators at operating nuclear power plants, which are minor.

28 Activities associated with ISFSI replacement and DTS operations, including cask repair, bare
29 fuel handling as part of repackaging operations, and cask replacement, are expected to be of
30 relatively short duration and limited extent in any year during long-term continued storage.
31 These activities are likely to involve only a portion of the ISFSI, and in any year would likely
32 involve only a fraction of the air emissions that were associated with initial construction of the
33 at-reactor ISFSI. As a result, there may be temporary increases in levels of suspended
34 particulate matter from construction and replacement activities. In addition, exhaust from
35 vehicles would add to levels of hydrocarbons, carbon monoxide, and nitrogen oxides. However,
36 these emissions of air pollutants are not expected to noticeably affect important attributes of air
37 quality in the region.

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1 Previous NRC NEPA analyses for site-specific licensing actions support this conclusion for
2 attainment, maintenance, and nonattainment areas. For example, the NRC analyzed the
3 impacts of constructing and operating an ISFSI at Humboldt Bay (NRC 2005a), which is located
4 in an attainment area, and determined that the air quality impacts were SMALL. The NRC also
5 analyzed the impacts of constructing and operating additional reactor units at existing nuclear
6 power plant sites such as Calvert Cliffs Unit 3 (NRC 2011a) and Fermi Unit 3 (NRC 2013b),
7 which are located in nonattainment areas. In both examples, the NRC determined that the air
8 impacts were SMALL, at least in part because licensees would be required to operate within
9 State permit requirements. The level of activities and associated air emissions from long-term
10 storage would not be greater than those for the construction and operation of another reactor
11 unit at an existing power plant site.

12 Emissions of air pollutants during ISFSI replacement and construction, operation, and
13 replacement of a DTS would be well below *de minimis* levels in 40 CFR Part 93 and the
14 requirements for a conformity determination would not apply. For example, the *de minimis*
15 annual emission rate for all nuclear power plants in nonattainment and maintenance areas is
16 100 T/yr for all criteria pollutants, except volatile organic compounds for plants within an ozone
17 transport region, for which the *de minimis* level is 50 T/yr (NRC 2013a). The NRC estimated the
18 peak annual emissions for preconstruction and construction of the entire Fermi Unit 3 nuclear
19 power plant to be 123.2 T/yr nitrogen oxide and 53.4 T/yr volatile organic compounds (NRC
20 2013b), which is only slightly above *de minimis* levels. Because the DTS and ISFSI are only a
21 small fraction of the size of an entire nuclear power plant, the emissions of air pollutants during
22 ISFSI replacement and DTS construction and replacement would be well below *de minimis*
23 levels.

24 Thermal releases from storing dry casks on the surface would cause some local atmospheric
25 heating. As described previously for short-term storage, this effect is not expected to be
26 noticeable and would decrease during the long-term storage timeframe as decay heat in the
27 ISFSI decreases over time.

28 Emissions of air pollutants during long-term continued storage of spent fuel would be minimal,
29 and the NRC concludes the impacts would be SMALL for all location classifications (i.e.,
30 attainment, nonattainment, and maintenance). The impact from heat released to the
31 atmosphere from ISFSIs would be SMALL because the small variations in downwind
32 temperatures would not be noticeable and would decrease throughout this period as decay heat
33 diminishes.

34 **4.4.3 Indefinite Storage**

35 This section describes the environmental impacts on air quality if a repository never becomes
36 available to accept spent fuel. Indefinite storage would consist of the same activities and result
37 in the same impacts as those for long-term storage (Section 4.4.2), except that they would

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1 continue indefinitely into the future. Thermal releases from storing dry casks on the surface
2 would cause some local atmospheric heating, which would continue to decrease as decay heat
3 from spent fuel diminishes. Therefore, the NRC concludes that the environmental impacts on
4 air quality from indefinite storage due to air emissions and thermal releases would each be
5 SMALL.

6 **4.5 Climate Change**

7 In this section, the NRC evaluates the effect of continued storage on climate change. The
8 NRC's evaluation of the effects of climate change on the intensity and frequency of natural
9 phenomena hazards that may cause spent fuel storage accidents is provided in Section 4.18.

10 **4.5.1 Short-Term Storage**

11 This section describes greenhouse gas emissions related to short-term continued storage of
12 spent fuel. The activities at a nuclear power plant during short-term continued storage involve
13 the emission of greenhouse gases, primarily carbon dioxide (CO₂). The quantities of
14 greenhouse gas emissions are often described in terms of a CO₂ footprint expressed as metric
15 tons of CO₂ equivalent. The NRC's previous estimates of a reference reactor's CO₂ footprint
16 during the decommissioning period includes activities in addition to those related to continued
17 storage of spent fuel. However, these estimates provide a reasonable upper bound on the
18 CO₂ footprint for short-term continued storage because the activities that occur as a direct result
19 of continued storage would generate less CO₂ than decommissioning activities.

20 The NRC estimated the CO₂ footprint for a reference 1,000-MW(e) reactor for a 50-year
21 decommissioning period, assuming the licensee chooses the SAFSTOR decommissioning
22 option (NRC 2011h). The greenhouse gas emissions resulting from the SAFSTOR
23 decommissioning option would include all emissions of greenhouse gases that would be
24 associated with the immediate decommissioning (or DECON) option, and also include the
25 greenhouse gases that would be emitted by vehicles used by the caretaker workforce for the
26 intervening 40-year period of SAFSTOR.² Therefore, greenhouse gas emissions associated
27 with the SAFSTOR option bound those associated with the DECON option. The NRC assumed
28 that SAFSTOR lasts for 40 years, and is followed by 10 years of major decommissioning
29 activities. The predominant sources of greenhouse gas emissions during major
30 decommissioning activities are fossil-fuel powered demolition equipment and worker
31 transportation vehicles for the estimated 300 decommissioning workers. Continued storage

² In the third option, the ENTOMB option, radioactive systems, structures, and components are encased in a structurally long-lived substance, such as concrete. The entombed structure is appropriately maintained, and continued surveillance is carried out until the radioactivity decays to a level that permits termination of the license. No licensee has ever chosen the ENTOMB option, and it is not considered further in this GEIS.

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1 activities at the spent fuel pool and at-reactor ISFSI do not involve significant sources of fossil-
2 fuel consuming activities, other than the use of vehicles by the commuting workforce, and the
3 occasional use of onsite vehicles for inspection and maintenance of spent fuel storage facilities.
4 Therefore, greenhouse gas emissions from decommissioning activities would be more than the
5 greenhouse gas emissions associated with the smaller workforce responsible for continued
6 storage. The CO₂ footprint of decommissioning is on the order of 48,000 MT of CO₂ equivalent,
7 or an annual emission rate of about 1,000 MT, averaged over the period of operation, compared
8 to a total U.S. annual CO₂ emissions rate of 6,702,000,000 MT of CO₂ equivalent (EPA 2012).

9 Based on its assessment of the relatively small short-term continued storage greenhouse gas
10 footprint compared to the U.S. annual CO₂ emissions, the NRC concludes that the atmospheric
11 impacts of greenhouse gases from short-term continued storage would not be noticeable and
12 would therefore be SMALL.

13 **4.5.2 Long-Term Storage**

14 This section describes the greenhouse gas production of continued storage during long-term
15 continued storage. Over the long-term storage timeframe, sources of greenhouse gas
16 emissions include vehicles used by the commuting workforce and workers conducting routine
17 maintenance activities for the at-reactor ISFSI, and construction and demolition equipment
18 required to initially construct, and eventually replace, a DTS and to replace the at-reactor ISFSI.
19 Given that activities at the site have been reduced to continued storage of spent fuel at the
20 at-reactor ISFSI, the CO₂ footprint for the commuting workforce would be no greater than that
21 associated with the SAFSTOR workforce described previously. Using the greenhouse gas
22 emission rate of 13,000 MT of CO₂ equivalent over 40 years associated with the SAFSTOR
23 option, this is approximately 32,500 MT of CO₂ equivalent over the 100-year long-term storage
24 timeframe (NRC 2011h).

25 The NRC's estimated CO₂ footprint for a reference 1,000-MW(e) reactor provides a useful upper
26 bound for the CO₂ footprint that would be associated with construction and replacement of the
27 ISFSI and DTS, which are much smaller facilities. The CO₂ footprint for construction equipment
28 used to build a 1,000-MW(e) reactor is about 35,000 MT of CO₂ equivalent. The CO₂ footprint
29 for decommissioning equipment used on a 1,000-MW(e) reactor is about 18,000 MT of
30 CO₂ equivalent (NRC 2011h).

31 Combining the total CO₂ footprints for the commuting workforce, construction and replacement
32 activities, and averaging over the 100-year long-term storage timeframe, the annual
33 CO₂ footprint is estimated to be no more than 855 MT of CO₂ equivalent, compared to a total
34 U.S. annual CO₂ emissions rate of 6,702,000,000 MT of CO₂ equivalent (EPA 2012). Based on
35 its assessment of the relatively small long-term continued storage greenhouse gas footprint
36

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1 compared to the U.S. annual CO₂ emissions, the NRC concludes that the atmospheric impacts
2 of greenhouse gases from long-term continued storage would not be noticeable and would
3 therefore be SMALL.

4 **4.5.3 Indefinite Storage**

5 This section describes the greenhouse gas production of continued storage if a repository never
6 becomes available to accept spent fuel. The main difference when compared to the impacts
7 during long-term storage is that without a repository these activities would occur on an ongoing
8 basis over a longer period of time so the total amount of emissions would be greater. However,
9 the annual emission levels for the various phases would remain the same.

10 The NRC concludes that the relative contribution from indefinite onsite storage of spent fuel to
11 greenhouse gas emission levels would be SMALL based on the same considerations as those
12 cited previously in the long-term storage section.

13 **4.6 Geology and Soils**

14 This section describes the potential environmental impacts on geology and soils caused by the
15 continued onsite storage of spent fuel.

16 **4.6.1 Short-Term Storage**

17 Continued spent fuel pool operation is not anticipated to increase impacts on the local geology
18 and soils. However, spent fuel pool leaks could result in radiological contamination of offsite
19 soils. The degree of contamination of offsite soils would depend on the rate of release from the
20 spent fuel pool, direction of groundwater flow, the distance to offsite locations, and the velocity
21 or transport rates of radionuclides through soils and radioactive decay rates. Tritium in
22 groundwater is likely to be observed as part of a licensee's radiological environmental
23 monitoring program, and corrective action would be taken consistent with Federal and State
24 requirements. In addition, most radionuclides move at a much slower rate and are much more
25 likely to be absorbed by the concrete structures of the spent fuel building and by the soil
26 surrounding the leak location. As a result, the NRC expects that most soil contamination from
27 spent fuel pool leaks would remain onsite and, therefore, offsite soil contamination is unlikely to
28 occur. Therefore, the NRC concludes that the environmental impact of spent fuel pool leaks to
29 offsite soils (i.e., outside the power plant's exclusion area) would be SMALL. Appendix E
30 contains additional information regarding the analysis of the impacts of spent fuel pool leaks on
31 soils.

32 Continued ISFSI operation is not expected to affect the underlying geology because ISFSIs
33 have no moving parts to affect the subsurface (see e.g., NRC 2012a). Although soils may be
34 affected by spills and leaks of radiological and hazardous materials, ISFSIs are designed to

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1 prevent leakage and licensee employees conduct routine inspections to verify that the ISFSIs
2 are performing as expected. Leaks could result in spills of oil and hazardous material from
3 operating equipment and stormwater runoff carrying grease. However, these activities are
4 monitored and, in the case of stormwater runoff, regulated under National Pollutant Discharge
5 Elimination System (NPDES) permit requirements (NRC 2002b).

6 Because no new land would be disturbed for the continued operation and maintenance of the
7 existing pool and ISFSI and the impacts from spent fuel leaks to offsite soils would be SMALL,
8 the NRC concludes that the continued storage of spent fuel during short-term storage on
9 geology and soils would be SMALL.

10 **4.6.2 Long-Term Storage**

11 During the long-term storage timeframe, routine maintenance and monitoring of the ISFSI would
12 continue. Similar to short-term storage, the operation of any ISFSI is not anticipated to have
13 any additional impacts on soils beyond those associated with construction.

14 The construction of a DTS is anticipated to have minimal impacts on soils due to the small size
15 of the DTS, which is about 0.7 ha (2 ac). The types of impacts on soils from construction of a
16 DTS would be similar to those anticipated for any power plant facility construction and would
17 include soil compaction, soil erosion, and potential surface leaks of oils, greases, and other
18 construction materials. Due to the relatively small size of the DTS, the impacts would be limited
19 to the immediate area. Any laydown areas associated with construction would be reclaimed
20 once the construction phase was complete. The draft GEIS also assumes that the ISFSI and
21 DTS would require replacement and could occur on land immediately adjacent to existing
22 facilities. There would be no permanent increase in the overall area of land disturbed because
23 the old facilities would be demolished and the land could be reclaimed.

24 The construction and operation of the DTS, along with the replacement of the DTS and ISFSI
25 facilities, would have minimal impacts on soils on the small fraction of the land committed for the
26 facilities. There are no anticipated impacts on the geology of the area as the result of these
27 activities. Therefore, the NRC concludes that the environmental impact on geology and soils
28 would be SMALL during long-term storage.

29 **4.6.3 Indefinite Storage**

30 In this section, impacts are evaluated assuming a repository does not become available. As
31 previously noted, the ISFSI would require continued maintenance and monitoring. In addition,
32 the ISFSI, storage casks, and DTS are assumed to be replaced every 100 years using a staged
33 approach. As described above, no additional land would be required for these activities. At the
34 end of the next 100-year cycle it is anticipated that the replacement of the ISFSI and DTS would
35 occur on previously disturbed land, thereby minimizing impacts on soils. Given the temporary

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1 nature of the impacts on geology and soils, and the occurrence of the impacts within previously
2 disturbed areas, the NRC concludes that the environmental impacts on geology and soils from
3 the indefinite onsite storage of spent fuel would be SMALL.

4 **4.7 Surface-Water Quality and Use**

5 This section describes potential environmental impacts on the quality and consumptive use of
6 surface water caused by continued storage of spent fuel in spent fuel pools and ISFSIs.

7 **4.7.1 Short-Term Storage**

8 During the short-term timeframe, most environmental impacts on surface-water resources
9 will cease due to the end of reactor operations. For example, consumptive water loss per
10 1,000 MW(e) for different cooling systems used at operating power plants ranges from
11 8,100 gpm for plants that use once-through cooling system to 14,000 gpm at plants with
12 mechanical draft cooling towers (NRC 2013a). After permanent cessation of operations,
13 the amount of heat rejected by these cooling systems would drop from over 10,000 BTU/hr to
14 approximately the initial 40-BTU/hr decay heat load associated with cooling a spent fuel pool
15 shortly after fuel is discharged from a reactor (EPRI 2002). Other potential impacts on surface-
16 water resources would result from use of water to shield workers from radiation in the reactor
17 area, continued stormwater management, and minor chemical spills. With more than
18 99 percent reduction in the amount of heat to be discharged, and a corresponding reduction in
19 cooling-water demand, potential impacts from these activities would be significantly less severe
20 than those associated with normal plant operation. The same activities described above also
21 may affect surface-water quality. Surface waters are most likely to be affected by stormwater
22 runoff, erosion, and by discharge of hazardous substances. However, these activities are
23 monitored and regulated under NPDES permit requirements (NRC 2002b).

24 **4.7.1.1 Spent Fuel Pools**

25 As described above, because cooling-water demand would be significantly reduced after reactor
26 operations have ceased, the NRC has determined that impacts on surface-water consumptive
27 use from the continued storage of spent fuel in spent fuel pools will not be detectable or be so
28 minor that they would not be destabilizing.

29 Surface-water quality may be affected by groundwater contamination. The NRC has completed
30 a review of its overall regulatory approach to groundwater protection (NRC 2011b). The NRC
31 started this review in response to recent incidents of radioactive contamination of groundwater
32 and soils at nuclear power plants. Contaminated groundwater at some sites may discharge to
33 nearby surface waters, resulting in indirect effects on surface-water quality. The concentrations
34 of radionuclides in offsite surface waters would depend on the rate of release from the spent
35 fuel pool, direction and rate of groundwater flow, the distance to nearby offsite surface waters

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1 toward which groundwater flows, the velocity or transport rates of radionuclides through the
2 subsurface and radioactive decay rates. However, because surface waters in the vicinity of
3 nuclear power plants are usually large to meet reactor cooling requirements, a large volume of
4 surface water is usually available to dilute groundwater contaminants that flow into the surface
5 waterbody. This dilution ensures that contaminants that may have been present above
6 applicable groundwater-quality standards are diluted well below limits considered safe.

7 The NRC estimated an annual discharge rate for leakage from the spent fuel pool of 380 L/d
8 (100 gpd) with contaminants at certain concentrations assumed to be present at the start of
9 short-term storage. These concentrations were compared to annual effluent ranges for BWRs
10 and PWRs. Even in the unlikely event that spent fuel pool leakage flowed continuously
11 (24 hours per day, 365 days per year) undetected and unimpeded to local surface waters, the
12 quantities of radioactive material discharged to nearby surface waters would be comparable to
13 values associated with permitted, treated effluent discharges from operating nuclear power
14 plants (see Table E-4). Based on the above considerations, the NRC concludes that the impact
15 of spent fuel pool leaks on surface water would be SMALL. More information about the NRC's
16 analysis of the environmental surface-water-quality impacts of continued storage of spent fuel
17 on nearby surface waters from groundwater contamination can be found in Appendix E of this
18 draft GEIS.

19 **4.7.1.2 ISFSIs**

20 As passive, air-cooled storage systems, ISFSIs do not consume water, and they generate
21 minimal liquid effluents that may be discharged to surface waterbodies during normal operation.
22 For example, in its consideration of water-use impacts for the renewal of the Calvert Cliffs
23 ISFSI, the NRC determined that both direct and indirect impacts would be SMALL (NRC 2012a).
24 This includes consideration of cask-loading operations and stormwater runoff carrying grease,
25 oil, and spills from operating equipment that support the ISFSI.

26 **4.7.1.3 Conclusion**

27 Because short-term storage of spent fuel would use less surface water and have fewer activities
28 that could affect surface-water quality than an operating reactor, which was previously
29 determined to have a SMALL impact, and because leaks from spent fuel pools would have a
30 SMALL impact on surface-water quality, the NRC concludes that impacts on surface-water
31 quality and consumptive use during the short-term storage timeframe would each be SMALL.

32 **4.7.2 Long-Term Storage**

33 During long-term storage, there is no demand for surface water for routine maintenance and
34 monitoring of an at-reactor ISFSI. In addition, as during short-term continued storage described
35 above, water-quality impacts from ISFSI operations would be minimal. However, during

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1 long-term continued storage, there could be temporary consumptive use of surface water for
2 demolishing and replacing the ISFSI and constructing and eventually replacing a DTS.

3 During ISFSI demolition, a small amount of water could be sprayed from water trucks to
4 minimize dust clouds. Additional water may be required to make concrete to replace facilities.
5 For example, it would require about 100,000 gal of water to make the concrete to replace an
6 entire 46 x 46 m (150 x150 ft) ISFSI pad that is 1 m (3 ft) thick. A comparable amount could be
7 required to replace dry cask storage system components, such as storage casks. If the activity
8 were to take several months to complete, the average daily consumptive water use would be a
9 few thousand gallons, which is less than the consumptive water loss estimated for an operating
10 reactor for 1 minute (NRC 2013a). Therefore, the consumptive water-use impacts for
11 demolishing and replacing the ISFSI would be minimal.

12 The NRC assumes that a DTS would need to be constructed and replaced during the long-term
13 storage timeframe. The construction and operation of a DTS involves very little, temporary
14 consumptive use of water. Some water would be required for construction of its concrete
15 basemat and shell. Given the relatively small size of the DTS compared to an ISFSI, less water
16 would be required to build the DTS than would be used to construct the ISFSI. During
17 operations, water would be brought to the facility by tanker truck or temporary connection to
18 public water supply for general purpose cleaning and canister decontamination. Additional
19 water might be consumed by activities such as drinking, conducting personal hygiene, and
20 disposing of sewage.

21 The NRC concludes that the potential consumptive use and surface-water quality impacts from
22 continued ISFSI operations would be minimal. Consumptive use of surface water for ISFSI
23 replacement and DTS construction, operation, and replacement would involve amounts of water
24 that are a small fraction of water use during reactor operations. Therefore, the NRC concludes
25 that the potential impacts on surface-water use and quality for the long-term storage timeframe
26 would be SMALL.

27 **4.7.3 Indefinite Storage**

28 If no repository becomes available, storage of spent fuel would continue indefinitely. As a
29 result, the potential impacts on surface-water resources would be similar to those described for
30 long-term storage (Section 4.7.2) because the same activities would occur. Every 100 years,
31 surface water would be required for demolishing and replacing the ISFSI and DTS. This
32 additional consumptive use would be temporary. Therefore, the NRC concludes that the
33 potential impacts on surface-water use and quality for the indefinite storage of spent fuel would
34 each be SMALL.

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1 **4.8 Groundwater Quality and Use**

2 This section describes the potential environmental impacts on groundwater water quality and
3 consumptive use caused by continued storage of spent fuel in spent fuel pools and at-reactor
4 ISFSIs.

5 **4.8.1 Short-Term Storage**

6 During short-term storage, most groundwater consumptive use and quality impacts that had
7 been caused by reactor operations would cease. Groundwater dewatering may occur during
8 short-term storage because groundwater may be pumped for potable water, sanitary uses, and
9 maintenance of spent fuel pools. However, surface-water resources may be used for these
10 activities.

11 The NRC determined in the License Renewal GEIS that consumptive use of groundwater during
12 reactor operation would be SMALL because groundwater supplies are commonly not used or
13 are used as a backup water source. During normal reactor operations, at most reactors, the
14 withdrawal rate from production aquifers is kept below 378 L/min (100 gpm) to avoid
15 groundwater-use conflicts (NRC 2013a). When reactor operations cease, the use of
16 groundwater is greatly reduced, especially at sites where reactor operations use groundwater as
17 a backup water source (e.g., H.B. Robinson Steam electric plant [NRC 2005b]). The potential
18 use of groundwater is greatly reduced when reactor operation ceases, because cooling-water
19 system demands are substantially lower after the facility is shut down and spent fuel is removed
20 from the reactor vessel (NRC 2002b).

21 **4.8.1.1 Spent Fuel Pools**

22 Because consumptive water-use impacts on groundwater resources during short-term storage
23 of spent fuel in spent fuel pools would be significantly less than during normal reactor operation,
24 the resultant impacts on groundwater at offsite wells would be nondetectable or so minor that
25 they would not destabilize groundwater resources. As a result, the NRC has made a generic
26 conclusion that the consumptive water-use impacts on groundwater resources during short-term
27 storage of spent fuel in spent fuel pools would be minor or minimal.

28 Continued short-term storage of spent fuel in spent fuel pools could result in radiological
29 impacts on groundwater quality. As discussed in Appendix E, in the **very unlikely** event that a
30 leak from a spent fuel pool goes undetected and the resulting groundwater plume reaches the
31 offsite environment, it is possible that the leak could be of sufficient magnitude and duration to
32 contaminate a groundwater source above a regulatory limit (i.e., a maximum contaminant level
33 [MCL] for one or more radionuclides). ~~As a result, the NRC acknowledges that the radiological
34 impacts on groundwater quality resulting from a spent fuel pool leak during short-term timeframe
35 could potentially be SMALL to MODERATE.~~

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1 But ~~the~~ impacts of a spent fuel pool leak on offsite groundwater depend on many factors,
2 including the volume and rate of water released from the spent fuel pool, the radionuclide
3 content and concentration and water chemistry of the spent fuel pool water, the direction of
4 groundwater flow, the distance to an offsite groundwater receptor, the velocity or transport rates
5 of radionuclides through the subsurface, and radioactive decay rates. Further, ~~As~~ discussed in
6 Appendix E, ~~however~~, spent fuel pool design (e.g., stainless-steel liners and leakage-collection
7 systems) and operational controls (e.g., monitoring and surveillance of spent fuel pool water
8 levels) make it unlikely that a leak will remain undetected long enough to exceed any regulatory
9 requirement (e.g., the NRC dose limit or EPA-mandated Maximum Contaminant Level) in the
10 offsite environment. Although a small number of spent fuel pool leaks have caused radioactive
11 liquid releases to the environment, based on the available data, none of these releases have
12 affected the health of the public (NRC 2006a). In addition, onsite groundwater monitoring
13 required to comply with 10 CFR 20.1501 provides added protection with respect to identifying a
14 spent fuel pool leak and, if necessary, isolating and remediating contaminated groundwater
15 onsite. A recent revision to the NRC's regulations that explicitly requires monitoring of
16 subsurface areas will further ensure leaks are detected. Besides these measures, the
17 hydrologic characteristics associated with typical nuclear power plant settings (see Section
18 E.2.1.3)—such as their location near large waterbodies (due to cooling requirements), shallow
19 water table flow direction toward these waterbodies, flat hydraulic gradients in the shallow water
20 tables, large distance to local groundwater users, and the likelihood that local groundwater
21 usage is in deeper confined aquifers—will act to impede the offsite migration of future spent fuel
22 pool leakage. Finally, current and future spent fuel pool sites are required to have routine
23 environmental monitoring programs in place that should take samples at offsite groundwater
24 sources (e.g., potable or irrigation) in areas where the hydraulic gradient or recharge properties
25 are suitable for contamination (NRC 1991c,d). Further, any detection of onsite contamination
26 would likely result in additional monitoring, including additional sampling of any nearby private
27 wells, as part of an expanded environmental monitoring program. With these measures and
28 characteristics in place, it is unlikely that offsite migration of spent fuel pool leaks will occur or go
29 undetected. Based on these factors, the NRC concludes that the radiological impacts on
30 groundwater quality resulting from a spent fuel pool leak during the short-term timeframe would
31 be SMALL.

32 The NRC is aware that unintentional releases of nonradiological hazardous substances have
33 infrequently occurred after reactors shut down. Except for a few substances (e.g., diesel fuel),
34 these hazardous spills are often localized, quickly detected, and relatively easy to remediate
35 (NRC 2002b). During the short-term storage timeframe, the licensee will decommission the site,
36 which will result in the ultimate cleanup of the portions of the reactor facility that are not needed
37 for continued short-term storage in a spent fuel pool. In addition, permit requirements (e.g.,
38 NPDES permit) and the requirements for compliance with the Resource Conservation and
39 Recovery Act (RCRA) and the Safe Drinking Water Act would minimize potential risks for

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1 nonradiological contamination entering groundwater during short-term spent fuel storage in
2 spent fuel pools.

3 Therefore, the NRC concludes that during short-term storage, the nonradiological impacts on
4 groundwater quality would be minimal.

5 **4.8.1.2 ISFSIs**

6 ISFSIs, which are passive systems, consume minimal water and generate minimal
7 nonradiological liquid effluents during normal operation (see e.g., NRC 2012a). The only
8 potential impact on groundwater quality from operating an ISFSI consists of the infiltration of
9 stormwater runoff carrying grease and oil, and spills from operating equipment that supports the
10 ISFSI. Because ISFSI storage requires minimal water and produces minimal, localized, and
11 easy-to-remediate liquid effluents on or near the ground surface, ISFSI storage impacts on
12 groundwater quality and use would not be detectable or would be so minor that they would not
13 be destabilizing to groundwater resources. As a result, the NRC concludes that the potential
14 consumptive water-use and quality impacts on groundwater during ISFSI storage of nuclear
15 fuels would be minimal.

16 **4.8.1.3 Conclusion**

17 Based on the discussion above, the NRC concludes that consumptive water-use impacts on
18 groundwater resources during short-term storage of spent fuel in spent fuel pools and at-reactor
19 ISFSIs would be SMALL. For groundwater quality, the NRC concludes that radiological and
20 nonradiological impacts during the short-term storage of spent fuel in pools and ISFSIs would
21 be SMALL.

22 **4.8.2 Long-Term Storage**

23 The consumptive water use associated with routine maintenance and monitoring of the ISFSI
24 discussed for short-term storage would continue during long-term storage. In addition, the NRC
25 assumes that a DTS would need to be constructed and operated during long-term storage. The
26 construction and operation of a DTS involves very little consumptive use of groundwater.
27 Concrete used for construction of the basemat and shell would likely arrive ready mixed, and
28 would not require additional water. For example, the NRC previously identified that little or no
29 water would be consumed by the construction of the Calvert Cliffs and Prairie Island ISFSIs
30 (NRC 1991a and 1992). Because the size of the DTS would be small compared to an ISFSI,
31 less water would be required to construct the DTS than would be used to construct the ISFSI.
32 During DTS operations, water would be brought to the facility by tanker truck or temporary
33 connection to public water supply for general purpose cleaning and canister decontamination.
34 Additional water might be consumed by activities such as drinking, conducting personal
35 hygiene, and disposing of sewage.

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1 The impacts on groundwater quality from the operation of the ISFSI during long-term storage
2 would be similar to the impacts discussed previously for short-term storage (Section 4.1.1).
3 While operation of the DTS does consume water, no groundwater quality affecting discharges
4 are expected. Therefore, the consumptive groundwater use and quality impacts from
5 construction of the DTS and operation of the ISFSI, including the DTS would be minimal during
6 long-term storage.

7 With regard to ISFSI and DTS replacement activities, the consumptive use and groundwater-
8 quality impacts would be similar to those associated with initial construction of the ISFSI. For
9 example, NRC staff determined that construction of the Calvert Cliffs and Prairie Island ISFSIs
10 (NRC 1991a, 1992) would have negligible to no impacts on water resources. Similarly, the
11 groundwater-quality and consumptive-use impacts associated with ISFSI and DTS replacement
12 activities during long-term storage would be minor.

13 Because the potential impacts on groundwater water quality and consumptive water uses during
14 long-term storage would be similar to the impacts during short-term dry storage, the NRC
15 concludes that the impacts on groundwater quality and consumptive use associated with the
16 long-term storage of spent fuel in an at-reactor ISFSI would be SMALL.

17 **4.8.3 Indefinite Storage**

18 If no repository becomes available, storage of spent fuel in an ISFSI would continue indefinitely.
19 As a result, the potential impacts on groundwater resources would be similar to those described
20 for long-term storage (Section 4.8.2) because the same activities would be happening at the
21 storage site. Every 100 years, groundwater may be required for demolishing and replacing the
22 ISFSI and DTS. This additional consumptive use would be temporary. Therefore, the NRC
23 concludes that the potential impacts on groundwater use and quality if a repository is not
24 available would each be SMALL.

25 **4.9 Terrestrial Resources**

26 This section describes potential environmental impacts on terrestrial resources caused by the
27 continued storage of spent fuel in spent fuel pools and at-reactor ISFSIs.

28 As explained in Section 3.8, a wide variety of terrestrial habitats are present at nuclear power
29 plant sites, which include spent fuel pools and at-reactor ISFSIs. The generic environmental
30 impact analyses in this section considers both existing generic analyses and site-specific
31 analyses that the NRC completed for licensing and relicensing of nuclear power plants and
32 ISFSIs. The significance of potential impacts on plants and animals and their habitats depends
33 on the importance or role of the plant or animal within the ecological community that is affected.

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1 **4.9.1 Short-Term Storage**

2 During the short-term storage timeframe, many activities that occurred during the operation of
3 the reactor that could affect terrestrial resources would cease. However, terrestrial resources
4 will likely continue to be affected during this timeframe by the continued operation of the spent
5 fuel pool cooling system, and by the operation and maintenance of systems and structures at
6 the nuclear power plant site and the at-reactor ISFSI.

7 **4.9.1.1 Spent Fuel Pools**

8 The following discussion describes the impacts of spent fuel pool operations during short-term
9 storage, using the impact analyses from the License Renewal GEIS to inform the NRC's
10 analysis of these impacts during short-term storage. Operation of a spent fuel pool and its
11 associated cooling system during short-term storage would require the withdrawal of water and
12 discharge of effluents into a nearby waterbody. The NRC evaluated the effects of the continued
13 operation of nuclear power plants, which included the operation of associated spent fuel pools,
14 on terrestrial resources in the License Renewal GEIS (NRC 2013a). The NRC then looked at
15 the systems that would be needed to cool the spent fuel pool during short-term storage, and
16 compared the impacts associated with water use during operations and water use after the end
17 of operations.

18 ***Water-Use Conflicts with Terrestrial Resources at Plants with Cooling Ponds or Cooling 19 Towers Using Makeup Water from a River***

20 Water from nearby lakes, rivers, and oceans is needed for both closed and once-through
21 cooling systems. Water-use conflicts with terrestrial resources could occur if water from a single
22 waterbody is required to simultaneously cool a spent fuel pool and support other water users
23 such as agricultural, municipal, or industrial users. A conflict could arise if the surface-water
24 resource is diminished because of decreased water availability due to low flow or drought
25 conditions; increased demand for agricultural, municipal, or industrial usage; or a combination of
26 factors (NRC 2013a).

27 The License Renewal GEIS evaluated the potential impacts on terrestrial biota and concluded
28 that the impacts from water-use conflicts with terrestrial resources could, in certain situations,
29 result in noticeable impacts on terrestrial resources (NRC 2013a). For example, Wolf Creek
30 Generating Station in Kansas, which operates a cooling pond to cool plant systems, withdraws
31 makeup water for the pond from the Neosho River located downstream of the John Redmond
32 reservoir. The riparian communities downstream of the reservoir may be temporarily affected
33 by the plant's water use during periods when the reservoir level is low and makeup water is
34 obtained from the Neosho River (NRC 2013a). Water-use conflicts during reactor operations,
35 such as those described previously, could result in SMALL to MODERATE impacts due to the
36 uncertainty associated with water availability to a plant for future water use (see, e.g.,
37 NRC 2008a).

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1 However, the water-withdrawal requirements for a spent fuel pool are considerably lower than
2 those for a power reactor (see Table 4-1). In addition, a State agency or the EPA would require
3 the licensee to obtain and comply with an NPDES permit, which would limit the amount of water
4 the facility could withdraw. As part of the NPDES review, the State agency or EPA would
5 assess the local water availability to help prevent water-use conflicts. In addition, the State
6 agency or EPA would review and, **if necessary**, update the NPDES permit, ~~if necessary~~, every 5
7 years. Therefore, the NRC concludes that water-use conflicts during short-term storage would
8 have minimal impacts on terrestrial resources.

9 **Table 4-1.** Reference Plant Withdrawal Rates and Heat Loads

	Reactor		Spent Fuel Pool
	Once-Through Cooling	Closed-Cycle Cooling	
Withdrawal Rate (gpm) ^(a)	800,000 ^(b)	12,000 ^(c)	2,800 ^(d)
Heat Load (10 ⁶ BTU/hr)	10,000 ^(b)	10,000 ^(b)	35 ^(b,e)

(a) The exact amount of water withdrawn depends on a variety of conditions, including water temperature, cooling system, size of the nuclear plant, and operational conditions.
(b) Approximate values based on a typical 1,000-MW(e) nuclear power plant.
(c) EPRI 2002.
(d) Value calculated based on a ratio of once-through cooling flow and heat load for a reactor, compared to design heat load for a spent fuel pool. Actual flow would vary based on site-specific characteristics, such as age and amount of spent fuel in the pool, surface-water temperature, etc. Value represents the maximum rate of water withdrawal expected during the timeframe analyzed in this draft GEIS, and would decrease as time after shutdown increases.
(e) Design heat load for a spent fuel pool.

10 ***Other Potential Impacts from the Spent Fuel Pool Cooling System***

11 The License Renewal GEIS determined that all other potential impacts on terrestrial ecology
12 from the operation of the cooling system would be SMALL at all nuclear power plant sites.
13 These additional impacts include the following:

- 14 • exposure of terrestrial organisms to radionuclides
- 15 • cooling-system impacts on terrestrial resources (plants with once-through cooling systems
16 or cooling ponds)
- 17 • cooling-tower impacts on vegetation

18 The License Renewal GEIS determined that these impacts on terrestrial ecology would be
19 SMALL at all power plants based on review of literature, operational monitoring reports,
20 consultations with utilities and regulatory agencies, and license renewal supplemental EISs
21 (SEISs) published to date. The License Renewal GEIS indicated that exceptions have been
22 observed at some nuclear plants; however, licensees have addressed the impacts by changing
23 plant operations to prevent impacts. During short-term storage, because reactor operations

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1 have ceased, these impacts will be less than during operations. Specifically, the frequency and
2 quantity of radionuclides released will decrease after reactor shutdown, resulting in less impact
3 on terrestrial organisms than considered in the License Renewal GEIS. Also, because the
4 cooling system requirements for the spent fuel pool (e.g., intake and discharge water volume
5 and heat load rejected) are much less than for an operating reactor, the impacts of the operation
6 of the cooling system will be much less than those considered in the License Renewal GEIS.
7 Therefore, the NRC has determined that the impacts of the spent fuel pool cooling system on
8 terrestrial ecology will be minimal during short-term storage.

9 ***Impacts from the Operation and Maintenance of Systems and Structures at the Nuclear*** 10 ***Power Plant Site***

11 The License Renewal GEIS evaluated other potential impacts on terrestrial resources from
12 sources other than the operation of the spent fuel pool cooling system. These additional
13 impacts include the following:

- 14 • electromagnetic fields on flora and fauna
- 15 • bird collisions with plant structures and transmission lines
- 16 • transmission-line right-of-way management impacts on terrestrial resources

17 NRC determined in the License Renewal GEIS that these impacts on terrestrial ecology would
18 be SMALL. During the short-term timeframe, electrical power will still be required to operate the
19 spent fuel pool cooling system and to provide power to the system associated with the operation
20 of ISFSIs (e.g., lighting). Licensees may choose to power these systems by maintaining the
21 existing transmission-line infrastructure or replacing this infrastructure with a smaller capacity
22 distribution system. This new distribution system would have smaller impacts than the existing
23 transmission lines because of the smaller profile, reduced electromagnetic field, and reduced
24 vegetative maintenance required around the distribution lines. In addition, fewer structures will
25 be required to be maintained during the short-term timeframe, which would reduce the likelihood
26 of bird collisions with nuclear power plant structures. As a result, the NRC has determined that
27 the impacts from the operation and maintenance of systems and structures at the nuclear power
28 plant site on terrestrial ecology will be minimal during short-term storage.

29 **4.9.1.2 ISFSIs**

30 Normal operation of an ISFSI does not require water for cooling and the facility would produce
31 minimal gaseous or liquid effluents. Therefore, no water withdrawal and minimal discharges
32 would be associated with the operation of ISFSIs. Some radiological exposure and
33 maintenance activities would occur during operation. Maintenance may include some ground-
34 disturbing or rights-of-way management activities. However, impacts on terrestrial resources
35 from short-term storage, including routine maintenance activities, would be temporary.

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1 After they are constructed, at-reactor ISFSIs have similar impacts on terrestrial resources,
2 regardless of their location, due to the passive nature and small size of an at-reactor ISFSI, and
3 because minimal liquid or gaseous effluents are generated during normal operations. This is
4 supported by a number of site-specific EAs performed in support of licensing actions that have
5 looked at the environmental impacts on terrestrial resources during ISFSI operations. For
6 example, a number of these reviews found that the ISFSIs would not contribute any significant
7 impacts on terrestrial resources during normal operations (see, e.g., NRC 2012a, 2005a, 2003).
8 Normal operation of an ISFSI would not generate any significant noise, would not significantly
9 affect the area available for terrestrial wildlife, and would not adversely affect terrestrial
10 environments or their associated plant and animal species (see, e.g., NRC 2012a, 2005a,
11 2003). In addition, while the air temperature in the immediate vicinity of the casks will be higher
12 than ambient temperature, the affected area is limited by the distance from the casks to
13 receptors and is not expected to affect terrestrial resources (see, e.g., NRC 2009a). To the
14 extent that animals and birds are affected by ISFSI operations, they would likely either
15 accustom themselves to regular operations or would relocate themselves away from the facility
16 (see, e.g., NRC 2012a). Further, licensees are required to adhere to the protection of eagles
17 and migratory birds under the Federal Bald and Golden Eagle Protection Act and Migratory Bird
18 Treaty Act. In addition, coordination with State natural resource agencies may further ensure
19 that power plant operators take appropriate steps to avoid or mitigate impacts on State species
20 of special concern that may not be protected under other Federal statutes.

21 4.9.1.3 Conclusion

22 Impacts associated with the operation of spent fuel pools and at-reactor ISFSIs would be
23 bounded by the impacts analyzed in the License Renewal GEIS and example ISFSI EAs
24 previously discussed. For operation of the spent fuel pool cooling system, impacts would be
25 bounded by those discussed in the License Renewal GEIS, primarily due to the reduced cooling
26 system requirements for the spent fuel pool (e.g., intake and discharge water volume and heat
27 load rejected). For ISFSI operations, impacts would be similar to those described in example
28 ISFSI EAs because of the passive nature and small size of ISFSIs, and because minimal liquid
29 or gaseous effluents are generated during normal operations. Therefore, the NRC concludes
30 that impacts on terrestrial resources from the operation of spent fuel pools and ISFSIs during
31 the short-term storage timeframe would be SMALL.

32 4.9.2 Long-Term Storage

33 During the long-term timeframe, routine maintenance and monitoring of the ISFSIs continues,
34 and the NRC assumes that a DTS is constructed, the fuel is moved from existing dry storage
35 casks to new dry storage casks, and a new ISFSI is constructed.

36 Impacts from the ongoing maintenance and monitoring of ISFSIs on terrestrial resources during
37 long-term storage would be similar to the impacts on terrestrial resources from short-term

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1 storage, described in Section 4.9.1. These impacts would be minimal due to the small size of
2 the ISFSIs, because water is not used for cooling, and because minimal liquid or gaseous
3 effluents are generated during normal operations.

4 ISFSIs are designed as passive systems that require no new or additional long-term
5 maintenance; however, an at-reactor ISFSI is assumed, for this draft GEIS, to require
6 replacement within the long-term storage timeframe, which would require repackaging of
7 spent fuel at a DTS. Replacement of the ISFSI would occur within the plant's operational
8 area adjacent to existing facilities. The older ISFSI would be demolished and the land
9 reclaimed and maintained for the next 100 years.

10 Impacts on terrestrial resources from ISFSI replacement activities would be similar to those
11 impacts evaluated for the decommissioning of an existing at-reactor ISFSI and the construction
12 of a new at-reactor ISFSI.

13 During the removal of an existing at-reactor ISFSI, increases in noise levels and changes in
14 localized air quality as a result of fugitive dust and equipment exhaust emissions would likely
15 result in animals and birds temporarily avoiding the activity area. Expected ground-disturbing,
16 re-grading, and reseeding activities associated with removal of the ISFSI are not expected to
17 substantially affect local vegetation. Unless the reclaimed area will be used for another
18 purpose, wildlife would likely re-inhabit the area as vegetation begins to reestablish itself (see,
19 e.g., NRC 2012a).

20 The impacts of the replacement and management of an ISFSI would be minimal because the
21 construction footprint of an ISFSI is relatively small, the ISFSI could be sited in a previously
22 disturbed area, and the licensees would likely be required to implement best management
23 practices as part of their NPDES permits to address issues such as stormwater runoff. This is
24 supported by a number of site-specific EAs performed in support of licensing actions that have
25 looked at the environmental impacts of the construction of an ISFSI on terrestrial resources.
26 For example, the NRC concluded in the EA for the Calvert Cliffs ISFSI renewal that the impact
27 on ecological resources from decommissioning would be SMALL and would not be significant in
28 part because the 2-ha (6-ac) ISFSI area was previously disturbed by ISFSI construction (NRC
29 2012a). Also, the NRC did not identify any significant impacts on aquatic resources from
30 construction of the Humboldt Bay ISFSI in part due to the fact that ground-disturbing activities
31 would be limited to 0.4 ha (1 ac) and the ISFSI would not be located near any aquatic features
32 (NRC 2005a). Similarly, the construction footprint for the Diablo Canyon ISFSI was limited to
33 2 ha (4.9 ac) and was sited in a previously disturbed area (NRC 2003). In addition, the NRC
34 indicated that controls would be in place to minimize any site runoff, spillage, and leaks
35 (NRC 2003, 2005a). Stormwater control measures, which would be required to comply with
36 NPDES permitting, would also minimize the impacts of site runoff, spillage, and leaks on nearby
37 wetlands.

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1 Like an ISFSI, a DTS would be located within the operational area adjacent to existing facilities
2 and, like ISFSI replacement and maintenance activities, a DTS would require construction and
3 maintenance activities. Impacts on terrestrial resources from repackaging and operation of the
4 DTS would be limited. Like ISFSIs, a DTS could likely be sited on previously disturbed ground
5 or away from sensitive terrestrial features because of the relatively small construction footprint
6 for a DTS (about 0.7 ha [2 ac]) compared to the entire power plant site and because there is a
7 sufficient amount of previously disturbed area on most nuclear power plant sites. The NRC
8 assumes that construction of a DTS would be temporary (1 to 2 years) and would require a
9 small fraction of the land (about 0.7 ha [2 ac]) committed for a nuclear power plant. The
10 construction laydown area would be reclaimed and revegetated after construction is completed.
11 There may be temporary increases in traffic, soil erosion, noise, fugitive dust, and habitat
12 reduction from construction and refurbishment activities that could affect terrestrial resources.
13 The plant operator could implement best management practices to minimize land disturbances,
14 vegetation removal, erosion, noise, and dust. DTSs and ISFSIs do not require water for cooling.
15 Minimal liquid or gaseous effluents are generated during normal operation. Thus construction,
16 repackaging, and replacement activities would have minimal impacts on terrestrial resources for
17 reasons previously explained. In addition, based on review of example EAs, the NRC expects
18 that normal operations of DTSs and ISFSIs would not generate any significant noise, would not
19 significantly affect the area available for terrestrial wildlife, and would not adversely affect
20 terrestrial environments or their associated plant and animal species. Therefore, the NRC
21 concludes that impacts on terrestrial resources during the long-term storage timeframe would be
22 SMALL.

23 **4.9.3 Indefinite Storage**

24 Activities and impacts from the operation of ISFSIs to terrestrial resources would be similar to
25 those described in Section 4.9.2, although replacement of the DTS and complete repackaging
26 would occur every 100 years. The NRC concluded in Section 4.9.2 that impacts on terrestrial
27 resources during long-term storage would be SMALL because continued operations,
28 repackaging, DTS construction, and DTS and ISFSI replacement would not adversely affect
29 terrestrial environments or their associated plant and animal species. In addition, replacement
30 of the ISFSI and DTS would likely occur on land near existing facilities and could be sited on
31 previously disturbed ground away from terrestrial species and habitats. By alternating the ISFSI
32 between two adjacent onsite locations, the NRC expects the upper limit of land disturbances to
33 be bounded by doubling the land area developed for existing ISFSIs presented in Table 3-1.
34 The older ISFSIs and DTSs would be demolished and the land likely reclaimed. Therefore, the
35 NRC concludes that the impacts on terrestrial resources from indefinite storage of spent fuel at
36 at-reactor ISFSIs would be SMALL.

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1 **4.10 Aquatic Ecology**

2 This section describes potential aquatic ecology impacts caused by the continued storage of
3 spent fuel in spent fuel pools and at-reactor ISFSIs. Impacts on aquatic resources include
4 impingement and entrainment; thermal impacts; effects of cooling-water discharge on dissolved
5 oxygen, gas supersaturation, and eutrophication (the over-enrichment of water by nutrients such
6 as nitrogen phosphorus); effects of nonradiological contaminants on aquatic organisms;
7 exposure of aquatic organisms to radionuclides; water-use conflicts with aquatic organisms; and
8 losses from predation, parasitism, and disease among organisms exposed to sublethal
9 stresses.

10 **4.10.1 Short-Term Storage**

11 During the short-term storage timeframe, many activities that occurred during the operation of
12 the reactor that could affect aquatic resources would cease. However, aquatic resources will
13 likely continue to be affected during this timeframe by the continued operation of the spent fuel
14 pool cooling system and the at-reactor ISFSI.

15 **4.10.1.1 Spent Fuel Pools**

16 The following discussion describes the impacts of spent fuel pools during short-term storage,
17 using the impact determinations from the License Renewal GEIS to inform the NRC's analysis
18 of these impacts during short-term storage.

19 Operation of a spent fuel pool and its associated cooling system during the short-term storage
20 timeframe would require the withdrawal of water and discharge of effluents into a nearby
21 waterbody. To make this comparison, the NRC evaluated the effects of the continued operation
22 of nuclear power plants, which included the operation of associated spent fuel pools, on aquatic
23 ecology in the License Renewal GEIS (NRC 2013a). The NRC then looked at the systems that
24 would be needed to cool the spent fuel pool during short-term storage, and compared the
25 impacts associated with water use during operations and water use after the end of operations.

26 ***Impingement and Entrainment of Aquatic Organisms***

27 Aquatic organisms can be impinged or entrained when cooling-water intakes for spent fuel pools
28 withdraw water that provides habitat to fish, shellfish, plankton, or other aquatic resources.
29 Impingement, which mostly involves fish and shellfish, occurs when organisms are held against
30 the intake screen or netting placed within intake canals. Exhaustion, starvation, asphyxiation,
31 descaling, and physical stresses may kill or injure impinged organisms. The License Renewal
32 GEIS describes some of the fish species commonly impinged at operating power plants as well
33 as other vertebrate species that may also be impinged on the traveling screens or on intake
34

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1 netting placed within intake canals
2 (NRC 2013a). These species would
3 likely continue to be impinged as a
4 result of operation of the spent fuel
5 pool cooling system during the short-
6 term storage timeframe.

Impingement

Impingement is the entrapment of all life stages of fish and shellfish on the outer part of an intake structure or against a screening device during periods of water withdrawal (40 CFR 125.83).

Entrainment

Entrainment is incorporation of all life stages of fish and shellfish with intake water flow entering and passing through a cooling-water-intake structure and into a cooling-water system (40 CFR 125.83).

7 Entrainment occurs when organisms
8 pass through the intake screens and
9 travel through the spent fuel pool
10 condenser cooling system. Heat,
11 physical stress, or chemicals used to
12 clean the cooling system may kill or
13 injure the entrained organisms. Due to these physical stresses, the NRC assumes 100 percent
14 mortality for all entrained organisms. Typically entrained aquatic organisms include
15 ichthyoplankton (fish eggs and larvae), larval stages of shellfish and other macroinvertebrates,
16 zooplankton, and phytoplankton. Juveniles and adults of some species may also be entrained if
17 they are small enough to pass through the intake screen openings, which are commonly 1 cm
18 (0.4 in) at the widest point. The License Renewal GEIS describes some of the fish species
19 commonly entrained at operating power plants (NRC 2013a). These species would likely
20 continue to be entrained as a result of operation of the spent fuel pool cooling system during the
21 short-term storage timeframe.

22 The severity of impacts associated with impingement and entrainment is dependent upon
23 several factors including the amount of water withdrawn relative to the size of the cooling-water
24 source, location and configuration of intake structures, type of waterbody from which water is
25 withdrawn, conditions within that waterbody, proximity of withdrawal structures to sensitive
26 biological habitats (e.g., spawning and nursery habitats), sensitivity of populations of impinged
27 and entrained organisms to potential losses of individuals, and mitigation measures in place to
28 reduce impingement and entrainment (NRC 2013a). Among these factors, the volume of water
29 withdrawn relative to the size of the water source can be a good predictor of the number of
30 organisms that would be impinged or entrained within a given aquatic system (EPA 2002).
31 Impingement monitoring at the Palisades Nuclear Plant in Michigan demonstrates this
32 difference: In 1972, when the plant used once-through cooling with a water-withdrawal rate of
33 400,000 gpm, 654,000 fish were impinged yearly. In 1976, cooling towers were added to the
34 plant, and it began operating as a closed-cycle plant. The intake withdrawal rate was reduced
35 to 78,000 gpm, and impingement dropped to 7,200 fish per year (Consumers Energy Company
36 and Nuclear Management Company 2001). These results showed that an approximate
37 80 percent decrease in water withdrawal resulted in an approximate 98 percent decrease in
38 impingement at Palisades Nuclear Plant.

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1 The License Renewal GEIS concluded that the impacts from impingement and entrainment
2 would be SMALL, MODERATE, or LARGE at operating plants with once-through cooling,
3 cooling ponds, or hybrid cooling (NRC 2013a). The magnitude of the impact would depend on
4 plant-specific characteristics of the cooling system (including location, intake velocities,
5 screening technologies, and withdrawal rates) and characteristics of the aquatic resource
6 (including population distribution, status, management objectives, and life history). However, for
7 operating plants with closed-cycle cooling, the License Renewal GEIS generically concluded
8 that impingement and entrainment is SMALL (NRC 2013a). The main reason the License
9 Renewal GEIS could generically conclude that the impacts would be SMALL at all closed-cycle
10 cooling plants is because power plants with closed-cycle cooling require much less water than
11 those with once-through cooling. For example, EPRI estimated that the average flow rate for a
12 reference 1,000-MW(e) nuclear plant with closed-cycle would be 12,000 gpm, which is
13 approximately 1 to 3 percent of the flow rate for a reference 1,000-MW(e) plant with once-
14 through cooling 416,700 to 1,000,000 gpm (EPRI 2002). Reactors are typically cooled either by
15 transferring excess heat directly to a water source (referred to as open-cycle cooling) or to the
16 atmosphere through a cooling tower (referred to as closed-cycle cooling). For nuclear power
17 plants with closed-cycle cooling systems installed, cooling water for the service-water system
18 (which cools the spent fuel pool) is usually withdrawn from a surface waterbody, circulated
19 through the service-water system, and sent to the cooling tower as a source of makeup water
20 for the main cooling system. While it is typically used as a source of makeup water, the
21 discharge from the service-water system can also be returned to the surface waterbody,
22 functioning, in essence, like an open-cycle cooling system. Because the heat load associated
23 with the spent fuel pool during continued storage is significantly smaller than a reactor at full
24 power and because of the costs associated with operating the cooling towers, the NRC
25 assumes that, for nuclear power plants with closed-cycle cooling systems, those systems will be
26 operated in a manner similar to an open-cycle cooling system to cool the spent fuel pool during
27 the short-term timeframe. As discussed below, the NRC expects that the flow rate associated
28 with the water needed to cool the spent fuel pool after operations will be significantly less than
29 the overall water needed during operation of the reactors, regardless of the cooling technology
30 used to cool the reactors. When compared to a once-through cooling system, the water needed
31 to cool the spent fuel pool is orders of magnitude less than the water needed during reactor
32 operations.

33 To operate spent fuel pools during short-term storage, the service-water system would likely
34 continue to operate to cool the spent fuel pools. Cooling systems associated with spent fuel
35 pools require substantially less water volume and carry a lower heat load than operating nuclear
36 power plants, as indicated in Table 4-1. For example, based on the current operation of spent
37 fuel pools, the NRC estimates that approximately 2,800 gpm would be withdrawn at each spent
38 fuel pool. Operating reactors with closed-cycle cooling systems, on the other hand, withdraw
39 approximately 12,000 gpm and operating plants with once-through cooling require 416,700 to
40 1,000,000 gpm (EPRI 2002). In addition, the amount of water withdrawn to cool spent fuel

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1 pools is likely to decrease over the short-term storage timeframe because the spent fuel pool
2 would require less cooling as the spent fuel cools. Based on the reduced operational
3 requirements for spent fuel pool cooling systems (e.g., reduced water-withdrawal and discharge
4 rates), the impingement and entrainment impacts from an operating nuclear plant bounds the
5 potential impacts from operating spent fuel pools during short-term storage.

6 Because operating the spent fuel pool cooling system during the short-term timeframe will use
7 less water than operating the cooling system for an operating plant with a closed-cycle cooling
8 system, which was considered in the License Renewal GEIS, the NRC concludes that
9 impingement and entrainment impacts from operating spent fuel pools during continued storage
10 would have minor impacts on aquatic resources.

11 ***Heat Shock***

12 Water-based cooling systems for spent fuel pools generally discharge heated effluent into
13 nearby waterbodies. Heat shock can occur if the water temperature meets or exceeds the
14 thermal tolerance of a species for some duration (NRC 2007a). In most situations, fish are
15 capable of moving out of an area that exceeds their thermal tolerance limits, although many
16 aquatic resource species lack such mobility. Heat shock is typically observable only for fish
17 species, particularly those that float when dead. The License Renewal GEIS provides additional
18 details on observed fish kills and other potential environmental impacts from heat shock.

19 The severity of impacts for heat shock depends on the characteristics of the cooling system
20 (including location and type of discharge structure, discharge velocity and volume, and
21 three-dimensional characteristics of the thermal plume) and characteristics of the affected
22 aquatic resources (including the species present and their physiology, habitat, population
23 distribution, status, management objectives, and life history). Site-specific design features, such
24 as locating the discharge structures in areas where warmer water would be rapidly diluted, may
25 mitigate adverse thermal effects (Beitinger et al. 2000). Hall et al. (1978) determined that the
26 potential for thermal discharge impacts is greatest in shallow, enclosed, and poorly mixed
27 waterbodies.

28 The License Renewal GEIS concluded that for operating plants with a once-through cooling
29 system or cooling ponds, the level of impact for thermal discharge on aquatic biota (primarily
30 due to heat shock) was SMALL at many plants and MODERATE or LARGE at some plants. For
31 example, some nuclear plants have reported occasional fish kills from heat shock (see, e.g.,
32 NRC 2006b, 2007a; Exelon 2001, 2005). For operating plants with closed-cycle cooling, the
33 NRC conducted a review of the literature and license renewal SEISs published to date and
34 determined that reduced populations of aquatic biota attributable to occurrences of heat shock
35 have not been reported for any existing nuclear power plants with cooling towers operated in
36 closed-cycle mode. Based on this review and because of the smaller thermal plumes at plants
37 with closed-cycle cooling compared to plants with once-through cooling systems, the License

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1 Renewal GEIS concluded that impacts from heat shock would be SMALL at all plants with
2 closed-cycle cooling. The thermal plume is generally smaller at plants with closed-cycle cooling
3 because less water is being discharged (NRC 2013a).

4 As described above, cooling systems associated with spent fuel pools operating during the
5 short-term storage timeframe would require substantially less water volume and carry a lower
6 heat load compared to operating nuclear power plants with closed-cycle cooling systems (see
7 Table 4-1). In addition, the heat load in the spent fuel pool would decrease over time as the fuel
8 continues to decay. Because the amount of water discharged from a spent fuel pool, regardless
9 of the type of cooling system, would still be significantly less than the amount of water
10 discharged from an operating plant with closed-cycle cooling, the extent of the thermal plume
11 would likely be smaller. In addition, the licensee would be required to obtain an NPDES permit
12 for thermal discharges, and the permit would limit the amount and temperature of thermal
13 effluent to be discharged. The NPDES permit would also require the licensee to monitor and
14 ensure the effluent is within the set thermal limit. Based on this information, the thermal impacts
15 from an operating nuclear plant with closed-cycle cooling (which was determined to be SMALL
16 in the License Renewal GEIS) likely bounds the potential thermal impacts from operating spent
17 fuel pools beyond the licensed term of the nuclear plant.

18 The NRC has determined that thermal impacts from operating spent fuel pools beyond the
19 licensed term of the plant would have a minor impact on aquatic resources because operating
20 the spent fuel pool cooling system during the short-term storage timeframe will use less water
21 than operating a closed-cycle cooling system for an operating reactor and a spent fuel pool
22 considered in the License Renewal GEIS.

23 ***Water-Use Conflicts with Aquatic Resources at Plants with Cooling Ponds or Cooling*** 24 ***Towers Using Makeup Water from a River***

25 Water-use conflicts with aquatic resources could occur if water from a single waterbody is
26 required to simultaneously cool a spent fuel pool to support aquatic resources, and support
27 other water users such as agricultural, municipal, or industrial users. A conflict could arise if the
28 surface-water resource is diminished either because of decreased water availability due to
29 droughts; increased demand for agricultural, municipal, or industrial usage; or a combination of
30 factors. The License Renewal GEIS determined that water-use conflicts during plant operation
31 are a concern for streams or rivers because of the duration of license renewal and potentially
32 increasing demands on surface water. However, the water-withdrawal requirements for a spent
33 fuel pool during short-term storage are considerably lower than for an operating plant (see
34 Table 4-1). In addition, the spent fuel pool operator would be required to obtain and comply with
35 an NPDES permit, which would limit the amount of water that could be withdrawn. As part of
36 the NPDES review, the State agency or EPA would assess the local water availability to help
37 prevent water-use conflicts. In addition, the NPDES permit would be reviewed, and updated if
38 necessary, every 5 years. Because operating the spent fuel pool cooling system during

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1 short-term storage will use significantly less water than operating the cooling system for an
2 operating plant considered in the License Renewal GEIS, the NRC has determined that water-
3 use conflicts from operating spent fuel pools during short-term storage would have minimal
4 impacts on aquatic resources.

5 ***Other Potential Impacts from the Cooling System***

6 The License Renewal GEIS determined that all other potential impacts on aquatic ecology from
7 the operation of the cooling system would be SMALL at all nuclear power plants. These
8 additional impacts include the following:

- 9 • cold shock, which can occur when organisms acclimated to the elevated temperatures of a
10 thermal plume are abruptly exposed to temperature decreases when the artificial source of
11 heating stops
- 12 • the creation of thermal plume migration barriers, which would occur if the mixing zone of the
13 thermal plume covers an extensive cross-sectional area of a river and exceeds the fish
14 avoidance temperature (NRC 2013a)
- 15 • changes in the distribution of aquatic organisms
- 16 • accelerated development of aquatic insect maturation due to warmer temperatures
- 17 • stimulation of the growth of aquatic nuisance species
- 18 • effects of cooling-water discharge on dissolved oxygen, gas supersaturation, and
19 eutrophication
- 20 • effects of nonradiological contaminants on aquatic organisms
- 21 • exposure of aquatic organisms to radionuclides
- 22 • losses from predation, parasitism, and disease among organisms exposed to sublethal
23 stresses

24 In the License Renewal GEIS, the NRC determined that these impacts would be SMALL at all
25 nuclear power plants. The NRC based its conclusion on the following:

- 26 • Any fill kills or other events related to the impacts described previously were relatively rare
27 and did not result in population level impacts.
- 28 • The heat from the thermal plume usually dissipated rapidly.
- 29 • Heated plumes are often small relative to the size of the receiving waterbody. The License
30 Renewal GEIS provides additional details regarding these potential impacts and the studies
31 reviewed to support the SMALL conclusion.

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1 As described above, the water-withdrawal rate, discharge rates, and extent of the thermal plume
2 would be greater for an operating plant than a spent fuel pool during short-term storage (see
3 Table 4-1). Based on this information, the other potential impacts from an operating a nuclear
4 plant with closed-cycle cooling (which was determined to be SMALL in the License Renewal
5 GEIS) likely bound the potential impacts from operating spent fuel pools during short-term
6 storage. Because operating the spent fuel pool cooling system during short-term storage will
7 use less water than operating the cooling system for an operating plant considered in the
8 License Renewal GEIS, the NRC has determined that other potential impacts from operating
9 spent fuel pools during the short-term storage timeframe would have minimal impacts on
10 aquatic resources.

11 **4.10.1.2 ISFSIs**

12 The NRC reviewed example ISFSI EAs to inform its analysis of the environmental impacts of
13 ISFSIs on aquatic resources during short-term storage.

14 During normal operations, ISFSIs do not require water for cooling and the facility would produce
15 minimal gaseous or liquid effluents. Therefore, no water withdrawal or discharges would be
16 associated with the operation of ISFSIs. Some maintenance activities could occur during ISFSI
17 operation, which may include ground-disturbing activities. However, impacts on any aquatic
18 features would be minimal. Stormwater control measures, which would be required to comply
19 with NPDES permitting, would also minimize the flow of disturbed soils or other contaminants
20 into aquatic features. In addition, the plant operator would likely implement best management
21 practices to minimize erosion and sedimentation and control any runoff, spills, or leaks (NRC
22 2005a, 2003). For example, the EAs for the Calvert Cliffs, Humboldt Bay, and Diablo Canyon
23 ISFSIs did not identify any significant impacts on aquatic resources during normal operations of
24 an onsite dry cask storage facility (NRC 2003, 2005a, 2012a). Consequently, given that ISFSIs
25 do not require water for cooling and the facility would produce minimal gaseous or liquid
26 effluents, impacts on aquatic resources from the operation of ISFSIs during short-term storage
27 would not have noticeable impacts on aquatic resources.

28 **4.10.1.3 Conclusion**

29 Given that the impacts associated with the operation of spent fuel pools would likely be bounded
30 by the impacts analyzed in the License Renewal GEIS due to the lower withdrawal rates, lower
31 discharge rate, smaller thermal plume, and lower heat content for a spent fuel pool compared to
32 an operating reactor with closed-cycle cooling, the NRC concludes that impacts on aquatic
33 resources from the operation of spent fuel pools during short-term storage would be minimal. In
34 addition, the impacts from operation of at-reactor ISFSIs would be minimal because ISFSIs do
35 not require water for cooling, produce minimal gaseous or liquid effluents, and ground-disturbing
36 activities for ISFSI maintenance would have minimal impacts on aquatic ecology. Therefore the
37 NRC concludes that the potential environmental impacts on aquatic resources would be SMALL
38 during the short-term storage timeframe.

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1 **4.10.2 Long-Term Storage**

2 Routine maintenance and monitoring of the ISFSIs would continue during long-term storage.
3 Likewise, the impacts from routine maintenance and monitoring of ISFSIs during the short-term
4 storage timeframe would continue during the long-term storage timeframe and would remain the
5 same.

6 Due to the relatively small construction footprint of a DTS, a DTS could likely be sited and
7 constructed on land near existing facilities, on previously disturbed ground, and away from
8 sensitive aquatic features. In addition, the replacement DTS and ISFSI facilities could likely be
9 sited on previously disturbed ground away from sensitive aquatic features. For example, the
10 NRC did not identify any significant impacts on aquatic resources from construction of the
11 Humboldt Bay ISFSI in part due to the fact that ground-disturbing activities would be limited to
12 0.4 ha) and the ISFSI was not located near any aquatic features (NRC 2005a). Similarly, the
13 construction footprint for the Diablo Canyon ISFSI was limited to 2 ha and was sited in a
14 previously disturbed area that did not contain any sensitive aquatic features (NRC 2003). In
15 addition, the NRC (2003, 2005a) indicated that controls would be in place to minimize the flow
16 of any site runoff, spillage, and leaks into sensitive aquatic features. For example, stormwater
17 control measures, which would be required to comply with NPDES permitting, would minimize
18 the flow of disturbed soils or other contaminants into aquatic features. The plant operator could
19 also implement best management practices to minimize erosion and sedimentation.

20 ISFSIs and DTSs do not require water for cooling and produce minimal gaseous or liquid
21 effluents. In addition, replacement ISFSIs and DTSs could likely be sited on previously
22 disturbed ground away from sensitive aquatic features. The older ISFSIs and DTSs would be
23 demolished and the land reclaimed. Therefore, the NRC concludes that impacts on aquatic
24 resources during long-term storage would be SMALL.

25 **4.10.3 Indefinite Storage**

26 During indefinite storage, the activities that occur during long-term storage would continue and
27 the ISFSIs and DTSs would be replaced every 100 years. Therefore the impacts that occurred
28 during long-term storage would continue. The NRC concluded in Section 4.10.2 that impacts on
29 aquatic resources would be SMALL because ISFSIs do not require water for cooling and would
30 have minimal impacts on aquatic resources. In addition, replacement of the ISFSIs and DTSs
31 would occur near existing facilities and could likely be sited on previously disturbed ground
32 away from sensitive aquatic features. The older ISFSIs and DTSs would be demolished and the
33 land reclaimed. Therefore, the NRC concludes that the impacts on aquatic resources from
34 indefinite storage of spent fuel in at-reactor ISFSIs would be SMALL.

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1 **4.11 Special Status Species and Habitat**

2 This section describes potential environmental impacts on special status species and their
3 habitats caused by the continued storage of spent fuel in spent fuel pools and at-reactor ISFSIs.
4 Special status species and habitats may include those identified in Section 4.9 for terrestrial
5 resources and Section 4.10 for aquatic resources.

6 **4.11.1 Short-Term Storage**

7 Impacts on Federally listed species, critical habitat, and essential fish habitat during short-term
8 storage may occur from spent fuel pool or ISFSI operations.

9 **4.11.1.1 Spent Fuel Pools**

10 Given that Federally listed species, critical habitat, and essential fish habitat may be affected by
11 operation of cooling systems for nuclear power plants, special status species and habitats could
12 also be affected by the operation of cooling systems for spent fuel pools during the short-term
13 storage timeframe. Possible impacts on Federally listed species, critical habitat, and essential
14 fish habitat would be similar to those described in Sections 4.9.1 and 4.10.1 for terrestrial and
15 aquatic resources.

16 Prior to entering the short-term storage timeframe, if listed species or critical habitat may occur
17 near the nuclear power plant site and the operation of the cooling system (which includes the
18 spent fuel pool cooling system) may affect those species, the NRC would evaluate those
19 impacts by preparing a Biological Assessment. The U.S. Fish and Wildlife Service (FWS) or
20 National Marine Fisheries Service (NMFS) would provide its evaluation of the impacts in a
21 Biological Opinion. The Biological Opinion may also require monitoring programs or mitigation
22 measures to minimize impacts on listed species and their habitats. If the evaluation indicates
23 that listed species would result in a “take,” or would “harass, harm, pursue, hunt, shoot, wound,
24 kill, trap, capture, or collect, or attempt to engage in any such conduct,” the biological opinion
25 could include an incidental take statement. The incidental take statement would specify the
26 allowable number of “takes” that could occur during a specified period. If the number of takes
27 exceeds the incidental take statement, the NRC would be required to reinitiate consultation with
28 the FWS or NMFS. For example, the Oyster Creek nuclear plant exceeded its incidental take
29 limit established by the NMFS for Kemp’s ridley sea turtles. The NRC, therefore, was required
30 to reinitiate Endangered Species Act (ESA) Section 7 consultation with NMFS, which included
31 the reevaluation of the impacts on the Kemp’s ridley sea turtles and potential mitigation
32 measures (NRC 2013a). Thus, the ESA Section 7 consultation process would help identify any
33 impacts on listed species, potentially require monitoring and mitigation to minimize impacts on
34 listed species, and ensure that any takes that occur as a result of cooling-system operations are
35 within the bounds of the incidental take statement. Additional details and guidance regarding

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1 the ESA Section 7 consultation process are provided 50 CFR Part 402 and in the *Endangered*
2 *Species Consultation Handbook* (FWS/NMFS 1998).

3 Identified species and critical habitats would continue to be protected under the ESA during the
4 short-term storage timeframe. For example, for nuclear power plants with a Biological Opinion,
5 the NRC would either need to continue to require the licensee to abide by the conditions
6 described in the Biological Opinion or reinitiate consultation with the FWS and NMFS if there is
7 a significant change in the plant parameters listed in the Biological Opinion, which would include
8 parameters associated with the spent fuel pool cooling system, that could affect listed species
9 or critical habitats in a manner or to an extent not previously considered. The most likely change
10 in a plant parameter during short-term storage would be a decrease in water-withdrawal and
11 discharge rates due to the lower water demands to operate a spent fuel pool than to operate a
12 nuclear power reactor. Impacts on special status species and habitats would likely decrease
13 due to less impingement, entrainment, and thermal impacts associated with lower withdrawal
14 and discharge rates.

15 Listed species that are not included in a Biological Opinion would continue to be protected
16 under the ESA. If operation of the spent fuel pool cooling system resulted in a “take” of a listed
17 species not covered under a Biological Opinion, the NRC would be required to initiate ESA
18 consultation with the FWS or NMFS. The official lists of ESA-listed species are regularly
19 updated by the FWS and NMFS. Species may be added to the list or delisted. If new species
20 were listed under the ESA, the NRC would evaluate any potential impacts on those species at
21 all NRC-licensed facilities at the time of listing. Therefore, if a new species was listed after the
22 licensed life of the associated nuclear reactor, the NRC would coordinate with the FWS and
23 NMFS to determine if the newly listed species could occur near a spent fuel pool. Further, NRC
24 would initiate ESA Section 7 consultation if operation of a spent fuel pool could adversely affect
25 the newly listed species.

26 The NRC is required under the Magnuson-Stevens Fishery Conservation and Management Act,
27 as amended, to consult with NMFS if operation of the cooling system could adversely impact
28 essential fish habitat. As part of this consultation, NRC would assess the occurrence of and
29 adverse impacts to essential fish habitat in an Essential Fish Habitat Assessment. The
30 implementing regulations for the Magnuson-Stevens Fishery Conservation and Management
31 Act (50 CFR 600) describe additional details regarding the steps involved in Essential Fish
32 Habitat consultation.

33 In addition, coordination with other Federal and State natural resource agencies would further
34 ensure that licensees take appropriate steps to avoid or mitigate impacts on special status
35 species, habitats of conservation concern, and other protected species and habitats, such as
36 those protected under the Marine Mammal Protection Act, the Migratory Bird Treaty Act, and the
37 Bald and Golden Eagle Protection Act. These consultations would likely result in avoidance or
38 mitigation measures that would minimize impacts on protected species and habitats.

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1 **4.11.1.2 ISFSIs**

2 Impacts from the operation of ISFSIs on special status species and habitats would be similar to
3 those described above for terrestrial and aquatic resources, which would be minimal due to the
4 small size of the ISFSIs and because no water is required for cooling. For example, the NRC's
5 EAs for the Humboldt Bay and Diablo Canyon ISFSIs did not identify any impacts on special
6 status species during normal operations of at-reactor ISFSIs (NRC 2003, 2005a).

7 As described in Section 4.11.1.1, the NRC is required to consult with NMFS for actions that may
8 affect essential fish habitat or marine mammals. The NRC assumes that these consultations
9 would result in avoidance or mitigation measures that would minimize impacts on protected
10 aquatic species and habitats. However, it is unlikely that ISFSIs would affect essential fish
11 habitat or marine mammals because they are built on land and do not require water for cooling.
12 In the unlikely event that an ISFSI could affect essential fish habitat, the NRC would consult with
13 NMFS. In addition, coordination with State natural resource agencies would further ensure that
14 plant operators take appropriate steps to avoid or mitigate impacts on State-listed species,
15 habitats of conservation concern, and other protected species and habitats.

16 **4.11.1.3 Conclusion**

17 As described above, the ESA has several requirements that would help ensure protection of
18 listed species and critical habitat during short-term storage. For spent fuel pools, the impacts
19 would be determined as part of ESA Section 7 consultation. In complying with the ESA, the
20 NRC would evaluate the impacts from spent fuel pool construction, operations, and
21 decommissioning in a site-specific review before the spent fuel pool is initially constructed, if the
22 cooling-system parameters change, or if a "take" occurs for a species not included in an
23 incidental take statement, as described in Section 4.11.1.1. The NRC would characterize the
24 effects of spent fuel pools to listed species in terms of its ESA findings of (1) no effect, (2) not
25 likely to adversely affect, (3) likely to adversely affect, or (4) is likely to jeopardize the listed
26 species or adversely modify the designated critical habitat of Federally listed species
27 populations or their critical habitats. Similarly, in complying with the Magnuson-Stevens Act
28 Fishery Conservation and Management Act, the NRC would report the effects of spent fuel
29 pools in terms of the Act's required findings of (1) no adverse impact, (2) minimal adverse
30 impact, or (3) substantial adverse impact on the essential habitat of Federally managed fish
31 populations. Impacts to non-listed special status species, such as State-listed species, would
32 be less than that experienced during the licensed life for operation of the reactor due to the
33 smaller size of the spent fuel pool and lower water demands.

34 For ISFSIs, given the minimal size and ability to site ISFSIs away from sensitive ecological
35 resources, the NRC concludes that ISFSIs are not likely to adversely affect listed species,
36 critical habitat, State-listed species, marine mammals, migratory birds, and bald and golden
37 eagles, and would have no adverse impact on essential fish habitat. In the unlikely situation

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1 that the continued operation of an ISFSI could affect listed species, critical habitat, or essential
2 fish habitat, the NRC would be required to initiate ESA Section 7 consultation with the NMFS or
3 FWS (for listed species or critical habitat) and initiate EFH consultation with NMFS (for essential
4 fish habitat).

5 **4.11.2 Long-Term Storage**

6 In addition to routine maintenance and monitoring of ISFSIs, impacts from the construction of a
7 DTS and replacement of the DTS and ISFSIs on special status species and habitats would be
8 similar to those described in Sections 4.9.2 and 4.10.2, which would be minimal due to the small
9 size of the ISFSIs and DTSs and because no water is required for cooling. The same
10 consultations and any associated mitigation requirements described in Section 4.11.1, would
11 apply to construction of a DTS and replacement of the DTS and ISFSI during long-term storage.
12 The NRC assumes that the ISFSIs and DTSs could be sited to avoid listed species and critical
13 habitat due to the small size of the construction footprint and sufficient amount of previously
14 disturbed areas on most nuclear power plant sites (NRC 2003, 2005a). For example, the EAs
15 for the Humboldt Bay and Diablo Canyon ISFSIs did not identify any significant impacts on
16 special status species from construction and normal operations of the at-reactor ISFSIs (NRC
17 2003, 2005a). In addition, coordination with Federal and State natural resource agencies would
18 further ensure that plant operators take appropriate steps to avoid or mitigate impacts on State-
19 listed species, habitats of conservation concern, and other protected species and habitats.
20 Therefore, the NRC concludes that construction of a DTS and the replacement of the DTS and
21 ISFSI that would occur during the long-term storage timeframe are not likely to adversely affect
22 listed species, critical habitat, State-listed species, marine mammals, migratory birds, and bald
23 and golden eagles, and would have no adverse impact on essential fish habitat. In the unlikely
24 situation that the ISFSI could affect listed species or critical habitat, the NRC would be required
25 to initiate ESA Section 7 consultation with the NMFS or FWS (for listed species or critical
26 habitat), and initiate EFH consultation with NMFS (for essential fish habitat).

27 **4.11.3 Indefinite Storage**

28 The impacts of indefinite storage on special status species and habitats would be minimal and
29 similar to those described in Sections 4.9.3 and 4.10.3. The same consultations and any
30 associated mitigation requirements described in Section 4.11.1 would apply to the construction
31 of the DTS and replacement of the DTS and ISFSI facilities during indefinite storage. For the
32 reasons described in Section 4.11.2, the NRC concludes that the replacement of the DTS and
33 ISFSI that would occur during the indefinite storage timeframe are not likely to adversely affect
34 listed species, critical habitat, State-listed species, marine mammals, migratory birds, and bald
35 and golden eagles, and would have no adverse impact on essential fish habitat. In the unlikely
36 situation that the ISFSI could affect listed species or critical habitat, the NRC would be required
37 to initiate Section 7 ESA consultation with the NMFS or FWS (for listed species or critical
38 habitat), and initiate EFH consultation with NMFS (for essential fish habitat).

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1 **4.12 Historic and Cultural Resources**

2 This section describes potential impacts on historic and cultural resources caused by the
3 continued storage of spent fuel in spent fuel pools and at-reactor ISFSIs.

4 The NRC is considering impacts on historic and cultural resources in this draft GEIS through
5 implementation of its NEPA requirements in 10 CFR Part 51. This rulemaking is not a licensing
6 action; it does not authorize the initial or continued operation of any nuclear power plant, and it
7 does not authorize storage of spent fuel. Because the Waste Confidence GEIS does not
8 identify specific sites for NRC licensing actions, a NHPA Section 106 review has not been
9 performed. However, the NRC complies with NHPA Section 106 and the implementing
10 provisions in 36 CFR Part 800 in site-specific licensing actions. As discussed in Section 3.11,
11 identification of historic properties, adverse effects, and potential resolution of adverse effects
12 would be conducted through consultation and application of the National Register of Historic
13 Places criteria in 36 CFR 60.4. This information would also be evaluated to determine the
14 significance of potential impacts on historic and cultural resources in the NRC's environmental
15 review documents.

16 As discussed in Section 3.11, most nuclear power plant sites are located in areas along
17 waterways that people tended to settle near or travel along, so there is a potential for historic
18 and cultural resources to be present. Waterways provided freshwater, the most abundant food
19 sources, transportation, and trade routes. As a result, prehistoric era archaeological sites and
20 historic-era sites tend to be found along these waterways (NRC 2013a). As part of the recent
21 License Renewal GEIS update, the NRC reviewed historic and cultural resource reviews that
22 were performed for 40 license renewals. For sites that had conducted field investigations, on
23 average, the number of historic and cultural resources present were 35 per site (NRC 2013a).
24 Many applicants conducted surveys to identify historic and cultural resources for their site-
25 specific reactor license renewal and new reactor license applications, and they have developed
26 and implemented historic and cultural resource management plans and procedures that protect
27 known historic and cultural resources and address inadvertent discoveries. However, some
28 licensees do not have management plans or procedures.

29 As discussed in Section 1.8, the NRC assumes that at-reactor ISFSIs are constructed onsite
30 under a general or site-specific license during the term of reactor operations (including license
31 renewal). A general license authorizes a power reactor licensee to build an at-reactor ISFSI
32 and store spent fuel onsite in dry storage casks that have received a certificate of compliance.
33 Under the general license, the authority to use a storage cask is tied to the cask's certificate of
34 compliance term, which is issued to the cask vendor through an NRC rulemaking process (NRC
35 1996). The NRC rulemaking for certification of the cask design involves both safety and
36 environmental reviews. The EA supporting the certification of the cask design rulemaking
37 generally assesses the environmental impacts associated with the use of this cask design at

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1 any power reactor site. However, the general license provisions do not require a site-specific
2 environmental analysis before constructing the ISFSI; therefore, there is no Section 106 review.

3 For site-specific licensing actions that are not under the general license described previously,
4 (new reactor licensing, reactor license renewal, away-from-reactor ISFSIs, and specifically
5 licensed at-reactor ISFSIs), the NRC complies with Section 106 requirements to consider the
6 effects of its undertaking on historic properties. If adverse effects on historic properties are
7 identified, appropriate mitigation can be developed through consultation with the State Historic
8 Preservation Officer, tribal representatives, and other interested parties. This information is also
9 used to determine the potential impact on historic and cultural resources for the proposed
10 specific licensing action. Issuance of a site-specific license could be granted at the conclusion
11 of the NRC's safety review, environmental review, and compliance with NHPA Section 106
12 requirements.

13 4.12.1 Short-Term Storage

14 During the short-term storage timeframe, the spent fuel pool would remain in operation until the
15 transfer of the spent fuel from the pool to an at-reactor ISFSI. As discussed in Section 3.11,
16 ground-disturbing activities occurred during initial nuclear power plant construction, and much of
17 the land within and immediately surrounding the power block was extensively disturbed. This
18 activity would have eliminated any potential for historic and cultural resources to be present in
19 these portions of the power plant site. Continued operations and maintenance activities
20 associated with spent fuel pools would not affect historic and cultural resources, because spent
21 fuel pools are located in the fuel building within the power block and most resources would have
22 been removed during initial plant construction.

23 As discussed in Section 3.11, less-developed or disturbed portions of a power plant site,
24 including the areas that were used to support construction of the at-reactor ISFSI, could contain
25 historic and cultural resources. For purposes of evaluating the impacts of continued storage in
26 this draft GEIS, the NRC assumes that at-reactor ISFSIs are constructed during the period of
27 reactor operations. Impacts associated with construction of an at-reactor ISFSI have already
28 occurred and are not considered in the short-term storage timeframe. Routine maintenance and
29 continued operations of an at-reactor ISFSI are not expected to affect historic and cultural
30 resources because no ground-disturbing activities are anticipated. If ground-disturbing activities
31 occur as a result of continued operations or maintenance, impacts could be mitigated if the
32 licensee has previously identified historic and cultural resources and has management plans
33 and protective procedures in place.

34 Because no ground-disturbing activities are anticipated during the short-term storage timeframe,
35 the impacts associated with continued operations and maintenance of the at-reactor ISFSI ~~and~~
36 ~~DTS~~ would be SMALL. Therefore, there would be no impacts on historic and cultural resources.

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1 **4.12.2 Long-Term Storage**

2 In addition to routine maintenance and monitoring, the NRC assumes that an at-reactor ISFSI
3 would be replaced, which will require the construction and operation of a DTS. Further, the
4 NRC assumes that the DTS is replaced once during the long-term storage timeframe. As
5 discussed in Section 1.8.3 of this draft GEIS, the NRC assumes that by the end of the short-
6 term storage timeframe a licensee with a general at-reactor ISFSI license will either terminate its
7 10 CFR Part 50 or 52 license and receive a site-specific license under 10 CFR Part 72 or
8 receive Commission approval under 10 CFR 50.82(a)(3) or 52.110(c) to continue
9 decommissioning under its 10 CFR Part 50 or 52 license.

10 NRC authorization to construct and operate a DTS and replace an at-reactor ISFSI and DTS
11 would constitute Federal actions under NEPA and would be undertakings under the NHPA. In
12 accordance with 36 CFR Part 800, a Section 106 review would be conducted for each
13 undertaking to determine whether historic properties are present in the area of potential effect,
14 and if so, whether these actions would result in any adverse effects on these properties.
15 License applicants are required to provide historic and cultural resource information in their
16 Environmental Reports. To prepare these assessments, applicants conduct cultural resource
17 surveys of any areas of proposed development to identify and record historic and cultural
18 resources. Impacts on historic and cultural resources would vary depending on what resources
19 are present. Resolution of adverse effects, if any, should be concluded prior to the closure of
20 the Section 106 process.

21 Impacts from continued operations and routine maintenance of the at-reactor ISFSI and DTS
22 during long-term storage would be similar to those described in the short-term storage
23 timeframe. The impacts would be SMALL because there would be no ground-disturbing
24 activities as a result of the continued operations and routine maintenance.

25 The replacement of the at-reactor ISFSI and initial and replacement DTS would require a site-
26 specific environmental review and compliance with NHPA requirements before making a
27 decision on the licensing action. The NRC assumes that the replacement of the at-reactor
28 ISFSI and initial and replacement DTS will be constructed on land near the existing facilities. As
29 discussed in Section 3.11, ground-disturbing activities occurred during initial nuclear power
30 plant construction, and much of the land within and immediately surrounding the power block
31 was extensively disturbed. This activity would have eliminated any potential for historic and
32 cultural resources to be present in these portions of the power plant site. However, less-
33 developed or disturbed portions of a power plant site, including areas that were used to support
34 construction of the at-reactor ISFSI, could contain historic and cultural resources. Given the
35 minimal size of the replacement ISFSI and initial and replacement DTS, and the large land
36 areas at nuclear power plant sites, licensees should be able to locate these facilities away from
37 historic and cultural resources. Potential adverse effects on historic properties or impacts on
38 historic and cultural resources could also be minimized through development of agreements,

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1 license conditions, and implementation of the licensee's historic and cultural resource
2 management plans and procedures to protect known historic and cultural resources and
3 address inadvertent discoveries during construction of the replacement at-reactor ISFSI and
4 initial and replacement DTS.

5 However, it may not be possible to avoid adverse effects on historic properties or impacts on
6 historic and cultural resources. The magnitude of adverse effect on historic properties and
7 impact on historic and cultural resources largely depends on what resources are present, the
8 extent of proposed land disturbance, whether the area has been previously surveyed to identify
9 historic and cultural resources, and whether the licensee has management plans and
10 procedures that are protective of historic and cultural resources. The site-specific
11 environmental review and compliance with the NHPA process could identify historic properties,
12 adverse effects and potentially resolve adverse effects on historic properties and impacts on
13 other historic and cultural resources. Therefore, the potential impacts on historic and cultural
14 resources could be SMALL, MODERATE, or LARGE depending on site-specific factors.

15 **4.12.3 Indefinite Storage**

16 This section describes the potential environmental impacts on historic and cultural resources if a
17 repository is not available to accept spent fuel. For this analysis, the NRC assumes that spent
18 fuel would continue to be stored onsite indefinitely. During this timeframe, maintenance and
19 monitoring would continue and the at-reactor ISFSI and DTS would be replaced every
20 100 years. If replacement activities occur in previously disturbed areas (i.e., in areas that have
21 previously experienced construction impacts) then impacts on historic and cultural resources
22 would be SMALL. Therefore, historic properties would not be adversely affected. If
23 construction activities occur in previously undisturbed areas or avoidance is not possible, then
24 there could be adverse effects on historic properties, and impacts on historic and cultural
25 resources could be SMALL, MODERATE, or LARGE depending on site-specific factors.

26 **4.13 Noise**

27 This section describes potential noise impacts caused by the continued storage of spent fuel in
28 spent fuel pools and at-reactor ISFSIs.

29 **4.13.1 Short-Term Storage**

30 During short-term storage, spent fuel pool systems would remain in operation to ensure
31 adequate cooling prior to the transfer of spent fuel from the pools to an at-reactor ISFSI. Most
32 noise would be generated when spent fuel is transferred from the spent fuel pool to the ISFSI.
33 Once reactor operations cease, there would be less noise generated because some of the
34 noise-generating equipment and activities would either cease or operate at lower levels.
35 Therefore, short-term storage noise levels would be less than reactor operation noise levels.

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1 The License Renewal GEIS (NRC 2013a) analyzed the environmental impacts associated with
2 continued reactor operations during the license term of a nuclear power plant. Facility noise
3 levels at operating reactor sites may sometimes exceed 55 dB(A) over a 24-hour period, which
4 is the threshold EPA identified to protect residential areas against excess noise during outdoor
5 activities (NRC 2013a; EPA 1974). As discussed in Section 3.12, primary factors that influence
6 impact magnitude are the noise level of the source and the proximity of the source to the
7 receptor. Proximity matters because noise levels decrease as distance from the source
8 increases. For point sources like stationary equipment, noise is reduced by about 6 dB(A) for
9 each doubling of distance from the source, and for a line source, like a road, noise is reduced by
10 3 dB(A) per doubling of the distance (Washington State Department of Transportation 2013).
11 As stated in the License Renewal GEIS (NRC 2013a), in most cases, the sources of noise are
12 far enough away from sensitive receptors that the noise is attenuated to nearly ambient levels
13 and is scarcely noticeable. However, in some cases noise from reactor operations can be
14 detected relatively close to the site boundary and create a minor nuisance.

15 As described earlier in this section, noise levels would be lower once reactor operations cease.
16 Noise sources associated with spent fuel pool storage include water cooling-system equipment,
17 spent fuel handling equipment, and in some cases vehicles to transport spent fuel from pools to
18 dry cask storage pads. Some of the noise from equipment associated with spent fuel pool
19 storage is attenuated because the activities occur inside a building, which functions as a noise
20 barrier. Spent fuel handling and transfer would be infrequent, so the noise generated from
21 these activities would also occur infrequently. Typically, pool storage sites produce no noise
22 impacts on the local environment (NRC 2004b).

23 As described in Section 3.12, spent fuel casks resting on concrete pads are essentially passive,
24 without any sources generating noise. Noise from routine maintenance and monitoring as well
25 as from ancillary activities such as operation of the administration buildings would be minimal.

26 Even in rare cases where an independently operating spent fuel pool causes noise impacts that
27 exceed the EPA-recommended threshold for outdoor noise, licensees are usually able to make
28 engineering changes to address the problem. For example, at the Maine Yankee nuclear power
29 plant the licensee set up the pool storage operations to operate independently from the reactor,
30 which was being decommissioned. The fans used as part of the spent pool cooling-system
31 generated noise levels up to 107 dB, which attenuated to 50 dB less than 1.6 km (1 mi) away
32 (NRC 2002b). This noise level exceeded the 55 dB(A) threshold recommended by the EPA for
33 protection against outdoor activity interference and annoyance. Nearby residents complained to
34 the plant staff about the noise level, and the licensee made engineering changes to the fans that
35 were causing the noise and the issue was resolved.

36 In conclusion, the operation noise levels, duration, and distance between the noise sources and
37 receptors generally do not produce noise impacts noticeable to the surrounding community. In
38 certain cases, such as Maine Yankee spent fuel pool island, potential noise impacts on

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1 receptors closest to the site property line can experience unmitigated noise levels that exceed
2 EPA-recommended noise levels. However, noticeable noise levels are generally not expected
3 and would be limited to the nearest receptors. Therefore, the NRC concludes that the overall
4 impact from noise during short-term storage would be SMALL.

5 **4.13.2 Long-Term Storage**

6 In addition to routine maintenance and monitoring, the NRC assumes that long-term storage
7 would include the construction, operation, and replacement of a DTS, and the replacement of
8 the ISFSI. Construction of a DTS would generate higher noise levels than DTS operations. The
9 NRC assumes that DTS construction would take 1–2 years. Construction equipment would be
10 used to grade and level the site, excavate the facility foundation, handle building materials, and
11 build the facility. Construction equipment generates noise levels over 90 dB(A) (at a reference
12 distance of 15 m [50 ft] from the source) (NRC 2002b). At distances greater than about 1.6 km
13 (1 mi), expected maximum noise levels from construction equipment would be reduced to about
14 55 dB(A), which is the EPA-recommended level for protection in residential areas against
15 outdoor activity interference and annoyance (NRC 2002b).

16 During operation of the DTS, some activities would be conducted inside the building, which
17 functions as a noise barrier. Spent fuel transfer between the storage pad and the DTS would be
18 infrequent. The NRC expects noise levels from this transfer of spent fuel to be no more than the
19 noise level generated transferring spent fuel from the pool to the dry pad, as described in
20 Section 4.13.1. In addition, some of the reactor and spent fuel pool storage noise sources
21 present during short-term storage (such as the cooling towers and associated equipment) would
22 not be present during long-term storage.

23 The NRC assumes that the at-reactor ISFSI (i.e., concrete storage casks and pads) and the
24 DTS would be replaced within the 100-year timeframe. Similar to the DTS construction, ISFSI
25 and DTS replacement uses construction equipment, which can generate noise levels over
26 90 dB(A). The noise levels exceed the EPA-recommended level for protection against outdoor
27 activity interference and annoyance (NRC 2002b). However, distance from the source will
28 eventually reduce the noise level to below the EPA-recommended level for protection against
29 outdoor activity interference and annoyance.

30 Construction and replacement of the DTS, although temporary and representing a small portion
31 of the overall long-term storage timeframe, would generate noise levels that exceed EPA-
32 recommended noise levels. Operational noise levels would not produce noise impacts
33 noticeable to the surrounding community. For some activities (e.g., replacement of the DTS
34 and ISFSI facilities), potential noise impacts on receptors closest to the site property line can
35 experience unmitigated noise levels that exceed EPA-recommended noise levels. However,
36 these activities are temporary and noticeable noise levels would be limited to the nearest
37 receptors. Therefore, the NRC concludes that the overall impact from noise during long-term
38 storage would be SMALL.

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1 **4.13.3 Indefinite Storage**

2 This section describes the noise impacts in the event a repository is not available to accept
3 spent fuel and the spent fuel must be stored indefinitely in ISFSIs. Impacts from indefinite
4 storage would be similar to those described for the long-term storage timeframe. NRC does not
5 anticipate that indefinite storage in an ISFSI would generate any new or additional noise in
6 comparison with the noise impacts described for the long-term storage timeframe. Therefore,
7 the NRC concludes that the overall impact from noise during indefinite storage would be
8 SMALL.

9 **4.14 Aesthetics**

10 This section describes potential impacts on aesthetic resources caused by continued storage of
11 spent fuel in spent fuel pools and at-reactor ISFSIs.

12 **4.14.1 Short-Term Storage**

13 No changes to nuclear power plant structures will be required for continued operation of the
14 spent fuel pool during continued storage, including routine maintenance and monitoring.

15 In the License Renewal GEIS, the NRC determined that the aesthetic impacts associated with
16 continued operation of a nuclear power plant, which included the continued operation of the
17 spent fuel pool, were SMALL because the existing visual profiles of nuclear power plants were
18 not expected to change during the license renewal term (NRC 2013a). Therefore, the NRC
19 concludes that the potential impacts from the short-term continued operation of the spent fuel
20 pool would be of minor significance to aesthetic resources.

21 For at-reactor ISFSIs, NRC evaluations of existing ISFSIs have found the aesthetic impacts to
22 be SMALL. For example, the NRC found that continued operation of the Calvert Cliffs ISFSI
23 would have a SMALL impact on aesthetic resources in part because there would be no new
24 construction at the facility (NRC 2012a). Similarly for Humboldt Bay, the NRC determined that
25 the aesthetic impact would be minimal (NRC 2005a), because the Humboldt Bay ISFSI is an
26 in-ground vault with a low visual profile. Given that the NRC assumes that all ISFSIs are
27 constructed during the nuclear power reactor's licensed life for operation, the visual profile of
28 at-reactor ISFSIs during short-term storage is expected to be the same after the permanent
29 cessation of reactor operations. The NRC therefore believes that potential impacts from short-
30 term continued storage in at-reactor ISFSIs would be of minor significance to aesthetic
31 resources.

32 This assessment of visual impacts depends in part on the degree of public interest and concern
33 about potential changes to the existing scenic quality. However, because no changes to the
34 visual profile are likely to occur as a result of the continued operation and maintenance of the

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1 existing spent fuel pool and ISFSI, the NRC concludes that the impacts from short-term storage
2 of spent fuel on aesthetics would be SMALL.

3 **4.14.2 Long-Term Storage**

4 As discussed in the previous section, routine maintenance is not expected to have an impact on
5 aesthetic resources. The NRC assumes that a DTS would need to be constructed during the
6 long-term storage timeframe. Construction and operation of a DTS would have limited impacts
7 on aesthetic resources. A DTS (approximately 26 ft × 18 ft and about 47 ft tall) is likely to have
8 a larger visual profile than other ISFSI structures; however, it would not be expected to provide
9 a significant visual contrast to the surrounding landscape. There would be temporarily adverse
10 impacts on aesthetic resources during construction of the DTS, resulting from the presence and
11 operation of the construction equipment used to build the facility. However, because a DTS is a
12 relatively small facility (e.g., compared to a nuclear power plant) and many of the internal
13 components of the facility would be prefabricated, the construction of a DTS would take less
14 time and equipment to build, and it would have a minimal impact on aesthetic resources.

15 Replacement of the ISFSIs and DTSs within the 100-year timeframe would occur on land
16 immediately adjacent to existing facilities. The NRC assumes that the overall land disturbed,
17 and hence the visual profile of the facility, would not increase because the old ISFSIs and DTSs
18 would be demolished and the land reclaimed. Impacts on aesthetic resources would likely
19 temporarily increase during the period of construction of the new facilities and demolition of the
20 old, when the most visible features are likely to be equipment associated with cask handling.
21 Aesthetic impacts from such equipment and its operation would be minimal.

22 Because continued operation of the ISFSI, construction and operation of the DTS, and
23 replacement of the ISFSIs and DTSs would not significantly alter the landscape of an at-reactor
24 ISFSI, the NRC concludes that the potential environmental impacts on aesthetic resources
25 during long-term storage would be SMALL.

26 **4.14.3 Indefinite Storage**

27 If a repository is not available, current practices of using at-reactor ISFSIs are expected to
28 continue indefinitely. At the end of each 100-year cycle, the previously reclaimed land would be
29 used to construct the replacement ISFSIs and DTSs. The potential activities and their impacts
30 would be the same as those described in Section 4.14.2 for long-term storage, but would
31 continue to occur repeatedly. Therefore, the NRC concludes that the indefinite onsite storage of
32 spent fuel would result in SMALL impacts on aesthetic resources.

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1 **4.15 Waste Management**

2 This section describes potential environmental impacts from low-level radioactive waste (LLW),
3 mixed waste, and nonradioactive waste management and disposal caused by the continued
4 storage of spent fuel in spent fuel pools and at-reactor ISFSIs.

5 Section 3.14 identified the types of waste generated by continued storage of spent fuel,
6 including LLW, mixed waste, hazardous waste, and nonradioactive, nonhazardous waste.
7 Because the NRC expects hazardous and nonradioactive, nonhazardous waste to be generated
8 in small amounts, these waste types are discussed together in this section as nonradioactive
9 waste.

10 After reactor operations cease, most waste-generating activities would also cease, except for
11 those associated with continued storage. Because there would be fewer waste-generating
12 activities during continued storage, the amount of waste generated would be less than that
13 estimated for reactor license renewal, and consequently the impacts in the License Renewal
14 GEIS would bound the impacts for waste during continued storage.

15 Impacts from the transportation of waste are discussed in Section 4.16. The public and
16 occupational health impacts associated with at-reactor radioactive waste-management activities
17 at nuclear plants are addressed in Section 4.17.

18 **4.15.1 Short-Term Storage**

19 The impacts associated with the management and disposal of LLW, mixed waste, and
20 nonradioactive waste during short-term continued storage are discussed in the following
21 sections.

22 **4.15.1.1 Low-Level Radioactive Waste**

23 The continued operation of a spent fuel pool would continue to generate minimal amounts of
24 LLW such as wet wastes from processing and recycling contaminated liquids. In the License
25 Renewal GEIS, the environmental impacts associated with the management and disposal of
26 LLW during normal reactor operation were determined to be SMALL (NRC 2013a). The NRC
27 concluded impacts from LLW would be SMALL because of the regulatory controls in place, low
28 public dose being achieved, and reasonable assurance that sufficient LLW disposal capacity will
29 be made available when needed for facilities to be decommissioned.

30 The amount of LLW generated from the operation and maintenance of an at-reactor ISFSI
31 during short-term storage is expected to be minimal. For example, in the Calvert Cliffs ISFSI
32 renewal EA (NRC 2012a), the NRC determined that the impacts from waste management would

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1 be SMALL, mainly because of the small quantities of LLW being generated and the fact that
2 those wastes would be handled and disposed of according to regulatory requirements.

3 Comprehensive regulatory controls, facilities, and procedures are in place at operating reactors
4 to ensure that the LLW is properly handled and stored and that doses and exposure to the
5 public and the environment are negligible at all plants (NRC 2013a). These same regulatory
6 controls are expected to remain in effect during short-term continued storage of spent fuel.

7 Because short-term continued storage of spent fuel would generate much less LLW than an
8 operating reactor and licensees would continue to implement Federal and State regulations and
9 requirements for proper management and disposal of LLW, the NRC concludes that the
10 environmental impact from the management and disposal of LLW would be SMALL for all
11 waste-management facilities.

12 **4.15.1.2 Mixed Waste**

13 The amount of mixed waste generated from the operation and maintenance of the spent fuel
14 pool and the ISFSI is expected to be minimal compared to that of an operating reactor. After
15 reactor operations cease, most waste-generating activities, as described in Section 3.14, would
16 also cease, except for those associated with continued storage.

17 In the License Renewal GEIS, the NRC determined that the radiological and nonradiological
18 environmental impacts from the storage and disposal of mixed waste would be SMALL for all
19 operating reactor sites (NRC 2013a) because of the small quantities generated and
20 comprehensive regulatory controls in place to ensure that this waste is properly managed and
21 that doses to the public and environment are negligible. In addition, as an example, the EIS for
22 the Fermi Unit 3 combined license states that 0.416 m³/yr (0.544 yd³/yr) of mixed waste would
23 be generated during operation. Because the amount of mixed waste generated during short-
24 term continued storage would be comparable to the relatively small amount estimated for
25 reactor license renewal, the impacts in the License Renewal GEIS would bound the impacts for
26 mixed waste during continued storage.

27 Comprehensive regulatory controls, facilities, and procedures are expected to remain in place
28 during short-term continued storage of spent fuel, which will ensure that mixed waste is properly
29 managed so that exposure to the public and environmental are negligible at all storage sites.

30 Because short-term storage of spent fuel would generate much less mixed waste than an
31 operating reactor and licensees would continue to implement Federal and State regulations
32 regarding proper management and disposal of mixed waste, the NRC concludes that the
33 environmental impact from the management and disposal of mixed waste would be SMALL.

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1 **4.15.1.3 Nonradioactive Waste**

2 The amount of nonradioactive waste generated from the operation and maintenance of an
3 at-reactor ISFSI is expected to be minimal compared to that of an operating reactor. After
4 reactor operations cease, most waste-generating activities would also cease, except for those
5 associated with short-term storage.

6 The impacts associated with the storage and disposal of nonradioactive wastes at operating
7 nuclear power plants were determined to be SMALL in the License Renewal GEIS
8 (NRC 2013a), because although the quantities of waste generated are highly variable, they are
9 generally less than amounts generated at other industrial facilities. After reactor operations
10 ceased, most waste-generating activities would also cease, except for those associated with
11 continued storage. Because the amount of waste generated during short-term storage would be
12 less than that estimated for reactor license renewal, the impacts in the License Renewal GEIS
13 would bound the impacts for nonradioactive waste during short-term continued storage.

14 For example, in EISs for the licensing of new reactors (e.g., Fermi 3 and Lee), the impacts
15 associated with the storage and disposal of nonradioactive waste, including hazardous waste,
16 were determined to be SMALL, primarily because the wastes would be handled and disposed of
17 according to County and State regulations (NRC 2013b, NRC 2011c).

18 The handling and disposal of hazardous wastes are regulated by the EPA or the responsible
19 State agencies in accordance with the requirements of RCRA. Nonhazardous wastes are
20 managed onsite and are generally disposed of in landfills permitted locally under RCRA
21 Subtitle D regulations. Similar to LLW and mixed waste, nonradioactive waste would continue
22 to be managed according to local, State, and Federal regulatory requirements.

23 Because short-term storage of spent fuel would generate less nonradioactive waste than an
24 operating reactor, which was previously determined to have a SMALL impact, and licensees
25 would continue to implement Federal and State regulations regarding proper management and
26 disposal of nonradioactive waste, the NRC concludes that the environmental impact from the
27 management and disposal of nonradioactive waste would be SMALL.

28 **4.15.2 Long-Term Storage**

29 Ongoing routine maintenance would continue to generate minimal amounts of waste. The NRC
30 assumes that, during this long-term storage timeframe, a DTS would need to be constructed
31 and operated. In addition, the DTS and ISFSI facilities (including casks and concrete pads)
32 would need to be replaced.

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1 **4.15.2.1 Low-Level Radioactive Waste**

2 Routine maintenance and monitoring of the ISFSI would continue to occur, which would
3 generate minimal amounts of LLW. The NRC anticipates no LLW would be generated by onsite
4 construction activities associated with the DTS.

5 During long-term storage, storage canisters will reach the end of their design life and require
6 replacement. The replacement process will involve the transfer of spent fuel assemblies to new
7 canisters and decontamination and disposal of the old canisters. The repackaging process is
8 expected to generate types of dry wastes similar to those described for normal operations (e.g.,
9 clothing and tools) and radioactively contaminated storage canisters that would be handled and
10 disposed of as LLW. Because storage canisters come into direct contact with spent fuel, it is
11 possible that the metal components could become contaminated or activated and require
12 disposal as LLW (EPRI 2010). In the Calvert Cliffs ISFSI renewal EA (NRC 2012a), the NRC
13 estimated that less than 0.06 m³ (2 ft³) per canister of LLW would be generated during cask
14 loading and decontamination. The LLW would be processed by compaction.

15 All spent fuel repackaging would be performed in the DTS. The repackaging process consists
16 of removal of the spent fuel assemblies from the old canister and their placement into a new
17 canister. For example, in the Calvert Cliffs ISFSI renewal EA (NRC 2012a), the NRC estimated
18 that less than 0.06 m³ (2 ft³) per canister of LLW would be generated during cask loading and
19 decontamination, based on a horizontal storage module design such as that described in
20 Section 2.1.2.2. This LLW would consist of garments, tapes, and cloths, and would be
21 processed by compaction. In addition, the old canister would require disposal. Because
22 storage canisters come into direct contact with spent fuel for an extended period of time, it is
23 assumed that the dry storage canister and any internal components have become activated or
24 radioactively contaminated and require disposal as LLW (EPRI 2010). For example the
25 NUHOMS 32P-S100 dry storage canister licensed for use at the Calvert Cliffs ISFSI has a
26 compacted nominal volume of 1.3 m³ (46 ft³) (Transnuclear 2004) that must be managed and
27 disposed of as LLW. Repackaging and replacement of the 120 canisters at the Calvert Cliffs
28 ISFSI would generate approximately 163 m³ (5,800 ft³) of compacted LLW.

29 In addition to repackaging the spent fuel during long-term storage, the ISFSI and DTS would
30 need to be replaced. For purposes of this analysis, because the activities associated with the
31 replacement and demolition of the ISFSI are similar to decommissioning activities, the impacts
32 from the replacement of casks and concrete pads are based on the decommissioning impacts
33 considered in the Calvert Cliffs ISFSI renewal EA, which are used as an example. A small
34 portion of the horizontal storage module could be expected to be contaminated, and it would
35 require disposal at a LLW facility. Affected soils would potentially have to be disposed of as
36 LLW. In the Calvert Cliffs ISFSI EA, the NRC determined that the impacts from waste
37 management during decommissioning would be SMALL (NRC 2012a). These impacts would be
38 similar for vertical storage designs, as described in Section 2.1.2.2. NRC previously determined

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1 that waste generated during reactor decommissioning would have a SMALL impact (NRC
2 2013a) and waste generated during ISFSI license renewal would also have a SMALL impact
3 (NRC 2012a). Because waste generated during the long-term storage timeframe would be less
4 than that generated during decommissioning, NRC expects that LLW generated during
5 replacement of an ISFSI and DTS would be minimal.

6 Because LLW would continue to be managed according to Federal regulations and the disposal
7 capacity for LLW is expected to be available when needed (see Section 1.8.3.), the NRC
8 determines the impacts from LLW management and disposal would be SMALL during long-term
9 storage.

10 **4.15.2.2 Mixed Waste**

11 Routine maintenance and monitoring of the ISFSI would continue during long-term storage, and
12 would generate minimal amounts of mixed waste. The repackaging of spent fuel, construction
13 and operation of a DTS, and the replacement of the ISFSIs and DTSs are not expected to
14 generate mixed waste. However, if mixed waste is generated, it would be a small fraction of
15 that generated by an operating nuclear power plant and it would be managed according to
16 regulatory requirements.

17 Due to the type of activities occurring during long-term storage that are expected to generate
18 minimal to no mixed waste and because the quantity of mixed waste generated from the
19 operation and replacement of the ISFSIs and DTSs is expected to be a small fraction of that
20 generated during the licensed life of the reactor, the radiological and nonradiological
21 environmental impacts associated with the management and disposal of mixed waste are
22 expected to be SMALL during long-term storage.

23 **4.15.2.3 Nonradioactive Waste**

24 Routine maintenance and monitoring of the ISFSI would continue to generate minimal amounts
25 of nonradioactive waste. The construction and operation of a DTS would be expected to
26 generate nonradioactive waste like construction debris, packaging material, and worker trash.

27 Repackaging of the canisters could generate some amount of nonradioactive waste if the waste
28 were never contaminated. Replacing the DTS and ISFSI facilities (including casks and storage
29 pads), would generate nonradioactive waste. The noncontaminated portions of the storage
30 modules, concrete pads, and DTS building would be demolished and disposed of as
31 construction debris in a landfill.

32 Similar to LLW estimates, the amount of nonradioactive waste generated from cask and facility
33 replacement is based on decommissioning estimates. However, specific quantities of
34 nonradioactive waste are difficult to estimate because the amount of waste will depend on
35 whether the materials were contaminated during storage.

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1 Based on the NUHOMS cask design described in Section 2.1.2.2, a single storage module
2 volume is 82.4 m³ (2910 ft³) of concrete and steel. The amount of material would be similar for
3 vertical storage cask designs, as described in Section 2.1.2.2. Some portion of this volume
4 would likely be disposed of as LLW due to contamination, but the majority of the waste would be
5 disposed of as nonradioactive waste. A 1-m (3.3-ft) thick ISFSI pad capable of supporting
6 108 NUHOMS horizontal storage modules, based on the example facility described in
7 Section 2.1.2.2, would contain about 9,270 m³ (327,370 ft³) of concrete that would need to be
8 demolished and disposed of as demolition debris. The amount of concrete would be similar for
9 vertical storage cask designs, as described in Section 2.1.2.2.

10 Routine maintenance, fuel repackaging, and construction and operation of the DTS and
11 replacement of the DTS and ISFSI are expected to generate nonradioactive waste that would
12 be handled in accordance with regulatory requirements and disposed of at an appropriately
13 permitted disposal facility. Although a large amount of nonradioactive waste would be
14 generated by the removal of the storage modules and storage pads (approximately 18,200 m³
15 [642,700 ft³]), it would still be less than the amount of waste generated during decommissioning
16 (which NRC already determined would have a SMALL impact), and it would not likely have a
17 noticeable impact on local or regional landfill capacity and operations. Therefore, the NRC
18 determines that the environmental impact from the management and disposal of nonradioactive
19 waste would also be SMALL during long-term storage.

20 **4.15.3 Indefinite Storage**

21 This section evaluates the potential environmental impacts from the management and disposal
22 of LLW, mixed waste, and nonradioactive waste from the indefinite at-reactor storage of spent
23 fuel. The waste-generating activities during this timeframe include the same activities discussed
24 in for long-term storage but with the activities occurring every 100 years.

25 **4.15.3.1 Low-Level Radioactive Waste**

26 The activities associated with the management and disposal of LLW from indefinite at-reactor
27 storage of spent fuel would be similar to those described for long-term storage. As stated in
28 Section 1.8.3, it is expected that sufficient LLW disposal capacity will be made available when
29 needed. Similar to long-term storage, the NRC concludes the management and disposal of
30 LLW could result in SMALL environmental impacts during indefinite storage of spent fuel.

31 **4.15.3.2 Mixed Waste**

32 The activities associated with managing and disposing of mixed waste from the indefinite
33 at-reactor storage of spent fuel after the licensed life for operations will be similar to those
34 discussed for long-term storage. Because of the relatively small quantity of mixed waste
35 generated from indefinite storage and licensee adherence to proper management and disposal

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1 regulations, the NRC concludes that the indefinite management of mixed wastes resulting from
2 at-reactor storage of spent fuel would result in SMALL impacts.

3 **4.15.3.3 Nonradioactive Waste**

4 Although the activities associated with managing and disposing of nonradioactive waste from
5 indefinite at-reactor storage will be similar to those discussed for long-term storage, the amount
6 of nonradioactive waste being generated is difficult to accurately estimate over an indefinite
7 timeframe. Therefore, the NRC concludes the management and disposal of nonradioactive
8 waste could result in SMALL to MODERATE impacts on nonradioactive waste landfill capacity.

9 **4.16 Transportation**

10 This section describes potential transportation impacts caused by the continued at-reactor
11 storage of spent fuel in spent fuel pools and ISFSIs.

12 The potential impacts from transportation activities include fugitive dust emissions, increased
13 traffic on local roads, worker and public exposure to radiation, and accident risks. The potential
14 impacts from transportation of spent fuel to a repository or to an away-from-reactor storage
15 facility are not evaluated in this section. Activities and impacts associated with transportation of
16 spent fuel to a repository would occur after continued storage and are addressed as cumulative
17 impacts in Chapter 6. The transportation activities to move spent fuel to an away-from-reactor
18 ISFSI during continued storage are addressed in Chapter 5. Air emissions are evaluated in
19 Section 4.4. This transportation analysis provides a generic analyses that is further supported
20 by a survey of recent site-specific analyses that were completed by the NRC for new reactors.
21 This transportation analysis considers the impacts of transportation activities during continued
22 storage on the affected environment beyond the site boundary. The environmental impacts
23 evaluated include the nonradiological impacts on regional traffic and accidents from worker
24 commuting, supply shipments, and waste shipments and the public and worker radiological
25 safety impacts from shipments of LLW generated by continued storage activities.

26 **4.16.1 Short-Term Storage**

27 Impacts on traffic from workers commuting to and from the power plant site during the short-
28 term storage timeframe depend on the size of the workforce, the capacity of the local road
29 network, traffic patterns, and the availability of alternate commuting routes to and from the
30 facility. While workforce levels are expected to vary among continued storage facilities
31 (including ISFSIs and spent fuel pools), the limited nature of storage operations relative to
32 power plant operations and the low reported and estimated storage workforce size indicate that
33 the workforce needed to support short-term storage would be much smaller than the power
34 plant workforce. For example, an operational full-time workforce of fewer than 20 workers has
35 been documented for wet storage (safe storage mode) at the GEH Morris ISFSI (NRC 2004b)

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1 and a 200-person workforce has been estimated for dry cask ISFSI fuel transfer and loading
2 operations at the Fort St. Vrain facility (NRC 1991b). For comparison, the operational workforce
3 at nuclear power plants ranges from 800 to 2,400 permanent personnel (NRC 2002b) with an
4 additional 1,000 or more temporary workers needed to support refueling operations (NRC
5 2011d). The environmental impact on traffic from renewal of operations of nuclear reactors was
6 evaluated generically in the License Renewal GEIS (NRC 2013a), which concluded the impacts
7 on traffic from commuting workers would be SMALL. Because at-reactor ISFSI and spent fuel
8 pool operations represent a small proportion of the operations at any reactor site, the NRC
9 concludes the traffic impacts of continuing the storage activities during the short-term timeframe
10 would continue to be a fraction of the small traffic impacts realized during the period of reactor
11 operations.

12 The operation of the at-reactor ISFSI and spent fuel pool would generate a small amount of
13 LLW (e.g., used personal protection equipment and wastes related to pool-to-cask transfer
14 activities) relative to power plant operations that would result in infrequent waste shipments to a
15 licensed disposal facility. The Atomic Energy Commission (AEC 1972) estimated the annual
16 amount of LLW generated from a typical 1,100-MW(e) operating light water reactor was 108 m³
17 (3,800 ft³), resulting in as many as 70 shipments of waste per year, assuming 0.05 m³ (1.8 ft³)
18 per drum and 30 drums per truck. More recent estimates of annual LLW generated by power
19 plants with higher power ratings are comparable (NRC 2011e) or as much as four times higher
20 (NRC 2011f) than the previously reported 108 m³ (3,800 ft³) value but would represent, on
21 average, less than one shipment per day. The small and infrequent number of shipments,
22 and compliance with NRC and U.S. Department of Transportation (DOT) packaging and
23 transportation regulations would limit potential worker and public radiological and
24 nonradiological impacts from these waste shipments. The radiological impacts on the public
25 and workers of LLW shipments from a reactor have been previously evaluated by the NRC.
26 A generic impact determination in Table S-4 in 10 CFR 51.52 and supporting analysis (AEC
27 1972) conclude that the environmental impacts of the transportation of fuel and waste to and
28 from a light water reactor under normal operations of transport and from accidents during
29 transport would be SMALL. Subsequent analysis of LLW transportation impacts in *Final*
30 *Environmental Statement on Transportation of Radioactive Material by Air and Other Modes*
31 (NRC 1977) concluded transportation impacts are small. Additional site-specific analyses of
32 transportation impacts for power plants that did not meet the conditions of 10 CFR 51.52 also
33 concluded the transportation radiological impacts would be SMALL (NRC 2006b, c; 2008b;
34 2011a,d-f; 2013a). Because LLW waste-generating activities for storage would be a fraction of
35 total power plant LLW-generating activities, the short-term storage LLW waste shipments would
36 also result in a small fraction of the low level of impacts realized for waste shipment during the
37 period of reactor operations.

38 Based on the preceding analysis that describes the low volume of traffic and shipping activities
39 associated with the continued storage of spent fuel in at-reactor ISFSIs and spent fuel pools, the

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1 NRC concludes the impacts on traffic and public and worker radiological and nonradiological
2 safety from transportation activities would be SMALL during the short-term storage timeframe.

3 **4.16.2 Long-Term Storage**

4 As discussed in Section 1.8, the NRC assumes that the spent fuel would need to be repackaged
5 during this timeframe, and that the ISFSI would be replaced. To facilitate the repackaging of the
6 spent fuel, the NRC assumes that a DTS would be constructed.

7 The construction of a DTS would require a small temporary workforce relative to the power plant
8 workforce. Because a DTS has not been constructed at any power plant site and construction
9 information is limited, the NRC considered a previously reviewed proposal to construct a spent
10 fuel transfer facility at the Idaho National Laboratory (NRC 2004a) that estimated a construction
11 workforce of 250 workers for 2 years. Because the proposed Idaho transfer facility is larger
12 (3.2 ha [8.0 ac] (NRC 2004a) than the assumed DTS (0.04 ha [0.1 ac], Section 2.2.2.1), the
13 Idaho facility bounds the impacts of constructing a DTS. For comparison, the operational
14 workforce at nuclear power plants ranges from 800 to 2,400 permanent personnel (NRC 2002b)
15 with an additional 1,000 or more temporary workers needed to support refueling operations
16 (NRC 2011d). Based on this information, the NRC concludes that worker commuting traffic
17 impacts associated with construction of a DTS during the long-term storage timeframe would be
18 a small fraction of the power plant operations traffic impacts (described in Section 4.16.1 as
19 small) and therefore the DTS construction traffic would also be small. Operation of the DTS
20 would involve fewer workers than the construction workforce and therefore the commuting traffic
21 impacts during the DTS operations period would also be minor. The remainder of activities
22 during the long-term storage timeframe would be similar to activities and impacts, as evaluated
23 in Section 4.16.1 (i.e., workers commuting and a small number of LLW shipments), and
24 therefore transportation impacts would continue to be small.

25 The operation of the DTS would involve shipment of materials and generate a small amount of
26 LLW (e.g., used canisters, decontamination swabs, air filters, and used personal protection
27 equipment) (DOE 1996) that would result in infrequent waste shipments to a licensed disposal
28 facility. Supply and waste shipments would be infrequent because transfer activities would
29 occur over a long period of time. The small and infrequent number of LLW shipments and
30 compliance with NRC and DOT packaging and transportation regulations would limit potential
31 worker and public radiological and nonradiological impacts from waste shipments.

32 Continued repackaging activities and the replacement of the ISFSIs and DTSs would generate
33 additional LLW and nonradiological waste that would need to be shipped offsite for disposal.
34 Section 4.15.2.1 provides an example estimate of 163 m³ (5,800 ft³) of compacted LLW from the
35 repackaging of all 120 canisters at a proposed ISFSI. Because repackaging would occur as
36 needed during the long-term storage timeframe, the LLW shipments would occur infrequently.
37 Repackaging and replacement would generate about 18,200 m³ (642,000 ft³) of nonhazardous

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1 waste (Section 4.15.3). Assuming the nonhazardous waste from replacement is shipped in roll-
2 off containers with a capacity of 15 m³ (20 yd³), the total number of truck shipments estimated is
3 1189. If replacement were phased over a 5-year period, and shipping occurred 5 days per
4 week, less than one shipment per day would be needed. The activities would not significantly
5 increase the magnitude of traffic generated by continued storage occurring each year.

6 The remainder of activities during the long-term storage timeframe would be similar to the
7 activities and impacts evaluated in Section 4.16.1 (i.e., workers commuting and a small number
8 of LLW shipments).

9 Due to the small workforce requirements for continued storage and aging management activities
10 (relative to the power plant workforce) and the low frequency of supply shipments and
11 shipments of LLW from DTS and ISFSI operations and replacement activities, the NRC
12 concludes that impacts on traffic and public and worker radiological and nonradiological safety
13 during the long-term storage timeframe would each be SMALL.

14 **4.16.3 Indefinite Storage**

15 Assuming no repository becomes available, spent fuel would be stored indefinitely in at-reactor
16 ISFSIs. Annual transportation activities and associated environmental impacts would be similar
17 to those analyzed for long-term storage operations and DTS construction and operations in
18 Section 4.16.2, including continued aging management, repackaging, and replacement
19 activities. In addition, because the impact analysis pertains to continued storage, the maximum
20 inventory of spent fuel in storage at any reactor site would be the same as that evaluated in
21 Section 4.16.1.

22 Because the NRC concluded in Section 4.16.2 that transportation impacts for continued storage
23 and aging management activities would be SMALL, and no significant changes to the annual
24 magnitude of traffic or waste shipments were identified in the preceding analysis of
25 transportation activities assuming indefinite at-reactor storage, the NRC concludes that the
26 transportation impacts during the indefinite storage timeframe would continue to be SMALL.

27 **4.17 Public and Occupational Health**

28 This section describes potential impacts on public and occupational health caused by the
29 continued storage of spent fuel in spent fuel pools and at-reactor ISFSIs.

30 For the purposes of assessing radiological impacts, impacts are considered to be SMALL if
31 releases and doses do not exceed dose standards in the NRC's regulations. This definition of
32 SMALL applies to occupational doses as well as to doses to individual members of the public.

33 Transportation-related public and occupational health impacts are addressed in Section 4.16.

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1 4.17.1 Short-Term Storage

2 Continued storage of spent fuel in spent fuel pools and ISFSIs is expected to continue in the
3 same manner as during the licensed life for operation of a reactor. The License Renewal GEIS
4 (NRC 2013a) describes a number of specific activities related to continued normal plant
5 operations that result in impacts on public and occupational health. These include normal plant
6 operation for power generation, the storage of spent fuel in fuel pools and ISFSIs, normal
7 refueling, and other outages that include steam generator replacements. Overall, data and
8 analyses presented in the License Renewal GEIS (NRC 2013a) provide ample evidence that
9 public and occupational doses at all commercial power plants are far below the dose limits in
10 10 CFR Part 20 and that the continuing efforts to maintain doses at as low as reasonably
11 achievable levels have been successful. Therefore, because continued storage represents a
12 fraction of the activities occurring during reactor operations, NRC expects that the public and
13 occupational doses would continue to remain below the regulatory dose limits.

14 Spent fuel pool leaks can result in environmental impacts. As discussed in Appendix E, in the
15 event that a leak from a spent fuel pool goes undetected and the resulting groundwater plume
16 reaches the offsite environment, it is possible that the leak could be of sufficient magnitude and
17 duration to contaminate a groundwater source above a regulatory limit (i.e., a maximum
18 contaminant level [MCL] for one or more radionuclides). ~~As a result, the NRC acknowledges
19 that the radiological impacts on groundwater quality resulting from a spent fuel pool leak during
20 short-term timeframe could potentially be SMALL to MODERATE.~~ As discussed in Appendix E,
21 factors such as spent fuel pool design (stainless-steel liners and leakage-collection systems)
22 and operational controls (monitoring and surveillance of spent fuel pool water levels), onsite and
23 offsite ground water monitoring, make it unlikely that a leak of sufficient quantity and duration
24 could occur without detection. Additionally, should a spent fuel pool leak occur, the hydrologic
25 characteristics typical at spent fuel pool locations make it improbable that water leaked from the
26 spent fuel pool would migrate offsite. Therefore, based on the low probability of a leak affecting
27 offsite groundwater sources, NRC concludes that impacts on public health resulting from a
28 spent fuel pool leak during short-term timeframe would be SMALL.

29 The data presented in NUREG-0713, "Occupational Radiation Exposure at Commercial Nuclear
30 Power Reactors and Other Facilities 2010" (NRC 2012b), as well as a number of ISFSI license
31 renewal EAs (e.g., the Surry ISFSI [NRC 2005c] and Calvert Cliffs ISFSI [NRC 2012a]), provide
32 ample evidence that the public and occupational radiological health impacts from the continued
33 storage of spent fuel are a small fraction of the doses and impacts presented in the License
34 Renewal GEIS (NRC 2013a) that include reactor operations. For example, NUREG-0713
35 (NRC 2012b) provides occupational exposure reporting from facilities that no longer have
36 operating reactors, such as the Big Rock Point and Trojan ISFSIs. Both of these facilities had
37 no measurable occupational exposure in the 2010 reporting period. The GEH Morris facility is a
38 spent-fuel-pool-only ISFSI and has never had an operating reactor onsite. Its 2010 annual

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1 report indicates an average measured total effective dose equivalent of 0.34 mSv (34 mrem) in
2 relation to the 10 CFR Part 20 occupational dose limit of 50 mSv (5,000 mrem).

3 The analyses presented in the License Renewal GEIS (NRC 2013a) and a number of ISFSI
4 license renewal EAs (e.g., the Surry ISFSI [NRC 2005c] and Calvert Cliffs ISFSI [NRC 2012a])
5 provide evidence that annual public and occupational doses would be maintained below the
6 annual dose limits established by 10 CFR Part 72 for the public and 10 CFR Part 20 for
7 occupational personnel. In addition, a licensed storage facility would be required to maintain an
8 as low as reasonably achievable program, which would likely result in doses lower than those
9 described in the License Renewal GEIS (NRC 2013a).

10 Nonradiological risks to occupational health and safety would include exposure to industrial
11 hazards and hazardous materials. Industrial hazards are those typical of other industrial facility
12 construction and operating hazards and include exposure to chemicals and accidents ranging
13 from minor cuts to industrial machinery accidents. Preventative maintenance activities are
14 conducted in accordance with Occupational Safety and Health Administration requirements and
15 are infrequent and minor. Therefore, nonradiological occupational health impacts are
16 considered to be minimal.

17 The NRC concludes that the impacts on public and occupational health due to continued
18 storage of spent fuel would be SMALL during the short-term storage timeframe.

19 **4.17.2 Long-Term Storage**

20 In addition to the impacts considered above for short-term continued storage in an ISFSI, the
21 NRC assumes that a DTS is constructed during the long-term storage timeframe. Risks to
22 occupational health and safety during construction of the DTS would include exposure to
23 industrial hazards, hazardous materials, and radioactive materials. Industrial hazards are those
24 typical of other industrial facility construction and operating hazards, and include exposure to
25 chemicals and accidents ranging from minor cuts to industrial machinery accidents. Because
26 construction activities are conducted in accordance with Occupational Safety and Health
27 Administration requirements, nonradiological occupational health impacts are considered to be
28 minor.

29 Once constructed, operation of the DTS would be very similar to the operations conducted at
30 current reactor plant sites with licensed ISFSIs where spent fuel is loaded into dry storage cask
31 systems and placed on an ISFSI pad. Analyses of ISFSI operations have been conducted in
32 numerous EAs such as the Calvert Cliffs (NRC 2012a) and Oconee Nuclear Station (NRC
33 2009b) ISFSI renewals. These analyses and REMP reports provide ample evidence that public
34 and occupational doses are being maintained well below the dose limits established by 10 CFR
35 Part 72 for the public and 10 CFR Part 20 for occupational personnel. In addition, all NRC-

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1 licensed facilities are also required to operate using an
2 as low as reasonably achievable program to ensure
3 radiation doses are maintained as low as is reasonably
4 achievable.

5 Based on the reasons provided above, the NRC
6 concludes that the impacts on public and occupational
7 health during long-term storage would be SMALL.

8 **4.17.3 Indefinite Storage**

9 The public and occupational health impacts of
10 continuing to store spent fuel without a repository would
11 be similar to those described for long-term storage. The
12 activities and associated human health impacts would
13 remain the same. The main difference is that these
14 activities would occur repeatedly.

15 The no repository scenario was analyzed in detail in the
16 Yucca Mountain final EIS (FEIS) (DOE 2002) as the
17 no-action alternative. The Yucca Mountain FEIS
18 analyses looked at the short- and long-term impacts of continued storage of spent fuel and high-
19 level radioactive waste at 72 commercial and 5 U.S. Department of Energy (DOE) sites for
20 10,000 years. The Yucca Mountain FEIS, in the analysis of the no-action alternative, assumes
21 all commercial spent nuclear fuel would eventually be stored in dry configurations in ISFSIs at
22 the existing locations. Detailed analyses were provided to demonstrate the expectation that
23 maintenance, repairs, repackaging, operation, and construction at the storage facilities would be
24 conducted in accordance with the requirements of the Occupational Safety and Health
25 Administration and 10 CFR Parts 20 and 72, as discussed in the sections above. In addition,
26 administrative controls and design features would minimize worker nonradioactive and
27 radioactive exposures. The Yucca Mountain FEIS analyses and the discussion provided in
28 Section 4.17.2 support the conclusion that public and occupational radiological health impacts
29 could be maintained within the public and occupational dose limits of 10 CFR Parts 72 and 20.
30 Therefore, the NRC concludes that the impacts on public and occupational health due to the
31 indefinite storage of spent fuel in at-reactor ISFSIs would be SMALL.

32 **4.18 Environmental Impacts of Postulated Accidents**

33 This section describes the environmental impacts of postulated accidents involving the
34 continued storage of spent fuel.

Design Basis Events, Design Basis Accidents, and Severe Accidents

Design basis events are conditions of normal operation, design basis accidents, external events, and natural phenomena, for which the plant must be designed to ensure the capability to prevent or mitigate the consequences of accidents that could result in potential offsite exposures (NRC 2007b).

Design basis accidents are postulated accidents that are used to set design criteria and limits for the design and sizing of safety-related systems and components (NRC 2007b).

Severe accidents, or beyond-design-basis accidents, are accidents that may challenge safety systems at a level much higher than expected.

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1 During continued storage, numerous features combine to reduce the risk associated with
2 accidents involving spent fuel storage in spent fuel pools and ISFSIs. Safety features in the
3 design, construction, and operation of nuclear power plants and ISFSIs, which are the first line
4 of defense, are intended to prevent the release of radioactive materials. Additional measures
5 are designed to mitigate the consequences of failures in the first line of defense. These include
6 the NRC's reactor site criteria in 10 CFR Part 100, "Reactor Site Criteria," that require the site to
7 have certain characteristics that reduce the risk to the public and the potential impacts of an
8 accident, and emergency preparedness plans and protective action measures for the site and
9 environs. All these safety features, measures, and plans make up the defense-in-depth
10 philosophy used by the NRC to protect the health and safety of the public and the environment
11 (NRC 2011c).

12 Consistent with the defense-in-depth philosophy, this section describes design basis events for
13 which the strategy is to prevent or mitigate the consequences of accidents that could result in
14 potential offsite doses. For some design basis events, such as tornadoes, this section
15 describes how the storage facility is designed and built to withstand the event without loss of
16 systems, structures, and components necessary to ensure public health and safety. In these
17 cases, the environmental impacts are small because no release of radioactive material would
18 occur. Other design basis events, such as spent fuel handling accidents, are design basis
19 accidents that licensees must assume could occur. In these cases, licensees must show how
20 engineered safety features in the facility mitigate a postulated release of radioactive material.
21 The environmental impacts of design basis accidents are small because all licensees must
22 maintain engineered safety features that ensure that the NRC dose limits for these accidents
23 are met. The basis for impact determinations for design basis events (i.e., whether the accident
24 is prevented or mitigated) is described for each type of design basis event presented in this
25 section.

26 Regulations governing accidents that must be addressed by nuclear power facilities, both
27 operating and shutdown, are found in 10 CFR Parts 50, 52, and 100. The environmental
28 impacts of design basis events, including those associated with the spent fuel pool, are
29 evaluated during the initial licensing process. The ability of the plant to withstand these
30 accidents is demonstrated to be acceptable before issuance of the operating license. The
31 results of these evaluations are found in license documentation, such as the NRC's safety
32 evaluation report, the final environmental impact statement, and in the licensee's Final Safety
33 Analysis Report (FSAR) or equivalent. The licensee is required to maintain the acceptable
34 design and performance criteria throughout the life of the plant, including continued storage
35 (NRC 2002b).

36 The consequences of a severe (or beyond-design-basis) accident, if one occurs, ~~would~~ could be
37 significant and destabilizing. The impact determinations for these accidents, however, are
38 made with consideration of the low probability of these events. The environmental impact

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1 determination with respect to severe accidents, therefore, is based on the risk, which the NRC
2 defines as the product of the probability and the consequences of an accident. This means that
3 a high-consequence low-probability event, like a severe accident, could still result in a small
4 impact determination, if the risk is sufficiently low.

5 This section of the draft GEIS follows a different format than the rest of the document. Because
6 the accident risks for spent fuel pool storage only apply during the short-term timeframe and the
7 accident risks for dry cask storage are substantially the same across the three timeframes, the
8 draft GEIS presents the various accident types only once. The three storage timeframes (short-
9 term, long-term, and indefinite, as described in Chapter 1) apply as follows:

- 10 • During short-term storage, both design basis and severe accidents are postulated for spent
11 fuel stored in the onsite spent fuel pool and at-reactor ISFSI.
- 12 • For long-term and indefinite storage, the NRC assumes that the spent fuel is moved from
13 the spent fuel pool to an at-reactor ISFSI. Therefore, only accidents involving an at-reactor
14 ISFSI are possible during the long-term and indefinite storage timeframes.

15 **4.18.1 Design Basis Events**

16 During the continued storage of spent fuel, licensees maintain systems, structures, and
17 components that ensure public health and safety. The hazards that are considered in the
18 design and operation of storage facilities include failure of facility systems, structures, and
19 components; man-made hazards, such as nearby military, industrial, and transportation
20 facilities; and natural phenomena, such as earthquakes and floods.

21 **4.18.1.1 Design Basis Events in Spent Fuel Pools**

22 A number of postulated design basis events are considered in the design of spent fuel pools.
23 Design features of spent fuel pools ensure prevention of inadvertent criticality and also ensure
24 that the pool is designed to withstand hazards that could result in a significant loss of water.
25 This section provides brief summaries of accidents involving spent fuel storage operations
26 during the short-term storage timeframe.

27 ***Criticality Accidents***

28 The presence of fissile nuclides in spent fuel means that controls must be in place to prevent
29 inadvertent nuclear chain reaction, or criticality, while spent fuel is in storage. NRC regulations
30 in 10 CFR 50.68, "Criticality Accident Requirements," and General Design Criterion 62,
31 "Prevention of Criticality in Fuel Storage and Handling," of Appendix A, "General Design Criteria
32 for Nuclear Power Plants," to 10 CFR Part 50 require that subcriticality in spent fuel pools be
33 maintained. To comply with these requirements, licensees design and implement controls
34 based on spent fuel pool nuclear criticality safety analyses. These controls include the use of

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1 neutron-absorbing material in spent fuel pool storage racks. The neutron-absorbing material's
2 physical properties, including its dimensions and boron-10 areal density, help maintain
3 subcriticality. The nuclear criticality safety analyses are usually documented in the licensee's
4 FSAR and are the basis for demonstrating compliance with plant technical specifications, NRC
5 regulations, and demonstrating adequate subcriticality for both normal operating conditions and
6 design basis accidents.

7 Many licensees use integrated defense-in-depth design features to reduce the chance of a
8 criticality accident if the neutron-absorbing material degrades. For example, some PWRs have
9 received approval to take credit for the soluble boron in the spent fuel pool.

10 Licensees are required to demonstrate that some margin to criticality is maintained for a variety
11 of abnormal conditions, including fuel-handling accidents involving a dropped fuel assembly.
12 The environmental impacts are small, therefore, because criticality accidents in spent fuel pools
13 are prevented.

14 ***Nearby Military, Industrial, and Transportation Facilities***

15 Nuclear power plant licensees are required to assess hazards from nearby military, industrial,
16 and transportation facilities to ensure that potential hazards in the site vicinity have been
17 considered in the plant's design bases. If hazards are identified, such as overpressure from
18 explosions from nearby industrial facilities, licensees are required to show that the probability is
19 sufficiently low (an order of magnitude of $10^{-7}/\text{yr}$ or less) or that radiological dose criteria in
20 10 CFR 50.34(a)(1) are met. Since either the probability or the consequences must be
21 acceptably small, the environmental risk of spent fuel pool releases caused by hazards from
22 nearby military, industrial, and transportation facilities is small.

23 ***Postulated Fuel Assembly or Cask Drop***

24 In accordance with NRC regulations in 10 CFR 50.34 and 52.79, a licensee must show that a
25 plant site and mitigating engineered safety features are acceptable with respect to the
26 consequences of postulated spent fuel cask drop accidents. Improper operation of the handling
27 equipment (e.g., cranes), poor rigging practices, and equipment failures can lead to a drop of a
28 cask or a fuel assembly into a spent fuel pool. Generally, the handling equipment is designed
29 and constructed in accordance with the ASME NOG-1 Standard (ASME 2010) to be certified as
30 single-failure-proof (any single failure will not drop the load).

31 A heavy load (e.g., cask) drop into the pool or onto the pool wall can affect the structural
32 integrity of the fuel pool. An unlikely drop of a fuel assembly may cause mechanical damage to
33 the fuel. Because a relatively small amount of mechanical damage to the fuel could cause
34 significant radiation doses to facility personnel and releases to the environment, the spent fuel
35 pool facility has radiation monitors and also provides confinement of radioactive material

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1 released from damaged fuel. The spent fuel pool facility is a controlled leakage building with a
2 safety-grade filtration system in its ventilation system. This filtration system provides the
3 necessary confinement to limit offsite dose consequences (NRC 2001).

4 The licensee provides the necessary plant description and analyses in its FSAR to demonstrate
5 the safety of the spent fuel pool during the initial license application of the reactor to the NRC.
6 The licensee also revises the plant description and accident analyses in the FSAR, as needed.
7 As part of its continuing regulatory oversight of the plant, the NRC reviews the plant description
8 and accident analyses during the initial licensing proceedings, as well as any subsequent
9 revision to the FSAR.

10 In general, the NRC's accident dose review criterion for fuel-handling accidents at most plants,
11 including cask drops, is 6.25 rem total effective dose equivalent (NRC 2000). This dose
12 criterion must be met regardless of the probability of the event.

13 Since the postulated fuel assembly or cask drop is among the design basis accidents analyzed
14 by licensees, and licensees must show that radiation dose limits in 10 CFR 50.34(a)(1) will be
15 met, the environmental consequences associated with this type of design basis accident during
16 continued storage would be small.

17 ***Natural Phenomena Hazards***

18 Appendix A, "General Design Criteria for Nuclear Power Plants," to 10 CFR Part 50 requires
19 that structures, systems, and components that are important to safety be designed to withstand
20 the effects of natural phenomena, such as earthquakes, tornadoes, hurricanes, floods, tsunamis
21 and seiches, without loss of capability to perform their safety functions. General Design
22 Criterion 2 (of Appendix A, "General Design Criteria for Nuclear Power Plants," to 10 CFR
23 Part 50) also requires that the design bases for these structures, systems, and components
24 reflect (1) appropriate consideration of the most severe of the natural phenomena that have
25 been historically reported for the site and surrounding area, with sufficient margin for the limited
26 accuracy, quantity, and period of time in which the historical data have been accumulated;
27 (2) appropriate combinations of the effects of normal and accident conditions with the effects of
28 the natural phenomena; and (3) the importance of the safety functions to be performed.

29 General Design Criterion 4, "Environmental and Dynamic Effects Design Bases," also applies to
30 spent fuel pool design as it relates to information on tornadoes that could generate missiles.

31 NRC siting regulations in 10 CFR Part 100, "Reactor Site Criteria," also require applicants to
32 consider, among other things, physical characteristics of sites that are necessary for safety
33 analysis or that may have an impact upon plant design (such as maximum probable wind speed
34 and precipitation). Licensees and applicants are required to identify and characterize the
35 physical characteristics of the site, so that they may be taken into consideration when

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1 determining the acceptability of the site. Appendix A of 10 CFR Part 100, "Seismic and
2 Geologic Siting Criteria for Nuclear Power Plants," describes the nature of investigations
3 required to obtain the geologic and seismic data necessary to determine site suitability and to
4 provide reasonable assurance that a nuclear power plant can be constructed and operated at a
5 proposed site without undue risk to the health and safety of the public. Appendix A describes
6 the procedures for determining the quantitative vibratory ground motion design basis at a site
7 due to earthquakes and describes information needed to determine whether and to what extent
8 a nuclear power plant needs to be designed to withstand the effects of surface faulting.

9 Each applicant for a construction permit for a power plant is required to investigate the site for
10 all seismic and geological factors that may affect the design and operation of the plant to
11 provide reasonable assurance that the plant can be constructed and operated without undue
12 risk to health and safety of the public. These siting criteria also provide reasonable assurance
13 that the spent fuel pool can be operated safely during the short-term storage timeframe.

14 Earthquakes

15 The NRC requires licensees to design, operate, and maintain safety-significant structures,
16 systems, and components, including spent fuel pools, to withstand the effects of earthquakes
17 and to maintain the capability to perform their intended safety functions. The agency ensures
18 these requirements are satisfied through the licensing, reactor oversight, and enforcement
19 processes (NRC 2011g). In 2005, the NRC began to assess the safety implications of
20 increased nuclear power plant earthquake hazards identified for the central and eastern
21 United States. The NRC identified the issue as Generic Issue 199 (GI-199) and completed a
22 limited scope screening analysis in December 2007, which culminated in the issuance of a
23 safety/risk assessment in August 2010 (NRC 2010). In the 2010 assessment, the NRC chose
24 seismic core damage frequency as the appropriate risk metric to changes in the seismic hazard.
25 For each power plant, the NRC estimated the change in seismic core damage frequency as a
26 result of the updated seismic hazard. This analysis confirmed that operating nuclear power
27 plants remain safe with no need for immediate action. The NRC took regulatory action after the
28 March 2011 earthquake and tsunami in Japan. In March 2012, the NRC issued a request for
29 information to all U.S. nuclear power plants asking licensees to (1) conduct walkdowns of their
30 plants, including the spent fuel pools, to identify and address plant-specific vulnerabilities
31 (through their corrective action programs) and verify the adequacies of monitoring and
32 maintenance procedures; and (2) re-evaluate the seismic hazards at the plants against present-
33 day NRC requirements and guidance. These assessments may make use of new consensus
34 seismic hazard estimates for the power plants in the central and eastern United States
35 developed by the DOE, EPRI, and NRC (NRC 2012c). The NRC has issued guidance to
36 complete these walkdowns and reevaluations and will take additional regulatory action, as
37 necessary, in response to the findings.

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1 Floods

2 As with earthquakes and other natural phenomena, the NRC requires licensees to design,
3 operate, and maintain safety-significant structures, systems, and components, including the
4 spent fuel pool, to withstand the effects of floods and to maintain the capability to perform their
5 intended safety functions. The analysis to meet this requirement involves estimating a design
6 basis flood, which is defined as a flood caused by one or an appropriate combination of several
7 hydrometeorological, geoseismic, or structural-failure phenomena, which results in the most
8 severe hazards to safety-significant structures, systems, and components (NRC 1977; Prasad
9 et al. 2011). Based in part on the plant physical siting location and characteristics, the design
10 basis flood can include flooding on the site caused by local intense precipitation or local
11 probable maximum precipitation, stream flooding, storm surges, seiches, tsunamis, seismically
12 induced dam failures or breaches, flooding caused by landslides, the effects of ice formation in
13 waterbodies, or some combination of these phenomena (NRC 2013a).

14 All safety-significant structures, systems, and components are required to be protected against
15 the design basis flood by siting them above the highest flood water-surface elevation or
16 providing adequate flooding protection. The NRC requires that this protection be achieved by
17 using a dry site concept, external barriers, or incorporated barriers (NRC 1976). The dry site
18 concept involves constructing the nuclear power plant above the design basis flood water-
19 surface elevation using either the natural terrain or engineered fill. External barriers are
20 engineered solutions that can include levees, seawalls or floodwalls, bulkheads, revetments, or
21 breakwaters. Incorporated barriers are also engineered solutions that involve specially
22 designed walls or penetration closures.

23 Given these physical siting and engineered factors, the environmental risk of spent fuel pool
24 releases caused by design basis floods is small.

25 The NRC also took regulatory action after the March 2011 earthquake and tsunami at the
26 Fukushima Dai-ichi nuclear power plant. In March 2012, the NRC (NRC 2012d) issued a
27 request for information to all U.S. nuclear power plants asking licensees to (1) conduct plant
28 walkdowns (visual inspections) to identify and address plant-specific vulnerabilities (through
29 their corrective action programs) and verify the adequacies of monitoring and maintenance
30 procedures; and (2) reevaluate the flooding hazards at the plants against present-day NRC
31 requirements and guidance to ensure that the plant is designed, operated, and maintained in
32 such a manner that safety-significant structures, systems, and components, including the spent
33 fuel pool, are able to withstand the effects of floods. The NRC has issued guidance to complete
34 these walkdowns and reevaluations and will take additional regulatory action, as necessary, in
35 response to the findings. The information collected in response to the request for information
36 will also be applicable to resolution of GI-204, "Flooding of Nuclear Power Plant Sites Following
37 Upstream Dam Failures" (NRC 2013c).

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1 High Winds (Tornadoes and Hurricanes)

2 The NRC requires licensees to consider both sustained straight winds, such as those caused
3 by hurricanes, and brief high rotational and translational winds that are caused by tornadoes
4 in the design of safety-related structures. Because tornado wind speeds are generally higher
5 than hurricane wind speeds, tornado winds tend to be the limiting consideration in design.
6 The NRC's definition of a design basis tornado, originally published in 1974 in Regulatory
7 Guide 1.76, describes design basis tornado characteristics in each of three regions of the
8 United States (NRC 1974). The design basis tornado characteristics east of the eastern
9 foothills of the Rocky Mountains included a maximum wind speed of 580 km/hr (360 mph). The
10 Pacific coastal region and Rocky Mountain region had design basis tornado characteristics that
11 include a maximum wind speed of 480 km/hr (300 mph) and 390 km/hr (240 mph), respectively.
12 Operating nuclear power plants in these regions that meet this guidance are designed to
13 withstand these wind speeds. By comparison, few hurricanes have achieved wind speeds of
14 310 km/hr (190 mph) (Bender et al. 2010).

15 In 2007, the NRC updated its design basis tornado definition such that a maximum wind speed
16 of 370 km/hr (230 mph) is appropriate for tornadoes for the central portion of the United States;
17 a maximum wind speed of 320 km/hr (200 mph) is appropriate for a large region of the United
18 States along the east coast, the northern border, and western Great Plains; and a maximum
19 wind speed of 260 km/hr (160 mph) is appropriate for the western United States (NRC 2007c).
20 Because design basis tornado windspeeds were decreased as a result of the analysis
21 performed to update Regulatory Guide 1.76, it was no longer clear that the revised tornado
22 design-basis windspeeds would bound design basis hurricane windspeeds in all areas of the
23 United States. As a result, in 2011 the NRC published new guidance for design basis hurricane
24 and hurricane missiles for nuclear power plants (NRC 2011h). This guidance describes
25 windspeeds and other hurricane characteristics acceptable to the staff for defining a design
26 basis hurricane for new nuclear power plants. For example, under this new guidance, which
27 would apply to new reactors, design basis 3-second gust windspeeds along the eastern Florida
28 coast range from 370 km/hr (230 mph) to 470 km/hr (290 mph).

29 Given the required design bases for nuclear power plants, including spent fuel pool structures,
30 severe winds are necessary to cause damage to a PWR or a BWR spent fuel pool. Generally,
31 the safety-related structures of spent fuel pool facility (e.g., pool wall) are designed to withstand
32 the design basis wind and missiles; however, the facility superstructure and other systems may
33 not be classified as safety-related and may sustain some damage from wind and wind-
34 generated missiles. In 2001, the NRC estimated the annual frequency of catastrophic pool
35 failure from an impact of a tornado-generated missile given a strike of a tornado having at least
36 F4 intensity to be less than 10^{-9} (NRC 2001). The extremely low probability of tornado-induced
37 accidents ensures that the environmental risk of spent fuel pool releases caused by design
38 basis high winds is small.

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1 Climate Change

2 As described above, NRC regulations in 10 CFR Parts 50, 52, and 100 require that spent fuel
3 pools be designed to withstand the effects of natural phenomena. Climate change can
4 influence the frequency and intensity of some natural phenomena. This section of the draft
5 GEIS addresses the environmental impacts from climate change on the continued storage of
6 spent fuel in spent fuel pools. The NRC acknowledges that climate change may have impacts
7 across a wide variety of resource areas including air, water, ecological, and human health. The
8 U.S. Global Change Research Program describes these potential impacts in the report *Global*
9 *Climate Change Impacts in the United States* (GCRP 2009). However, in this draft GEIS, the
10 discussion of impacts from climate change on the environment will focus on those affecting the
11 continued storage of spent fuel. The contribution of continued storage to greenhouse gas
12 emissions and climate change are addressed in Sections 4.5 and 5.5.

13 The consideration of climate change impacts for pool storage only needs to address the short-
14 term timeframe. Climate change can lead to an increased intensity and frequency of severe
15 weather events, such as flooding and hurricanes. As described previously in this section, the
16 NRC requires licensees to design, operate, and maintain safety-significant structures, systems,
17 and components to withstand the effects of floods and other natural phenomena, and to
18 maintain the capability to perform their intended safety functions. The agency ensures these
19 requirements are satisfied through the licensing, oversight, and enforcement processes. The
20 NRC's oversight authority over the licensed facilities will ensure that minimal impacts of natural
21 hazards would be associated with climate change during short-term continued storage in spent
22 fuel pools. Potential effects associated with climate change on the safety of spent fuel storage
23 are flooding from storm surges and high winds caused by extreme weather events like
24 hurricanes. Rise in sea level is controlled by complex processes, and it is estimated to rise less
25 than 1 m by 2100 (75 FR 81037). Based on this projected change, none of the U.S. nuclear
26 power plants (operational or decommissioned) will be under water or threatened by water levels
27 by 2050 (75 FR 81037). In addition to sea-level rise, spent fuel facilities may be affected by
28 increased storm surges, erosion, shoreline retreat, and inland flooding. Coastal area impacts
29 may be exacerbated by land subsidence. NRC-licensed spent fuel storage facilities are
30 designed to be robust. They are evaluated to ensure that the performance of their safety
31 systems, structures, and components is maintained during flooding events, and they are
32 monitored when in use. The lowest grade above the sea level of concern for an NRC-licensed
33 facility is currently about 4.3 m (14 ft) (75 FR 81037). In the event of climate change-induced
34 sea-level rise, the NRC (see, e.g., 10 CFR Part 50, Appendix B, Section XVI, "Corrective
35 Action") requires licensees to implement corrective actions to identify and correct or mitigate
36 conditions adverse to safety.

37 Climate change can also lead to an increase in the frequency of droughts. Increasing
38 temperatures have made droughts more severe and widespread. Trends in droughts vary
39 regionally. The frequency of droughts in the Southeast and West has increased. However

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1 areas in the Midwest and Great Plains have experienced a reduction in drought frequency
2 (GCRP 2009).Droughts can cause increased competition for limited water resources. Although
3 some aspects of spent fuel storage require water, the amount of water needed is minimal and
4 water use for spent fuel storage is not expected to cause water-use conflicts, even under the
5 changed conditions that could be caused by climate change (see Sections 4.7, 4.8, 5.7, and
6 5.8).

7 **Summary**

8 In summary, the postulated design basis accidents considered in this draft GEIS for spent fuel
9 pools include hazards from natural phenomena, such as earthquakes, flood, tornadoes, and
10 hurricanes; hazards from activities in the nearby facilities; and fuel handling-related accidents.
11 In addition, the potential effects of climate change are also considered. Based on the above
12 analysis, the environmental risk of these postulated accidents involving continued storage of
13 spent fuel in pools are SMALL, because all important to safety structures, systems, and
14 components involved with the fuel storage are designed to withstand these design basis
15 accidents without compromising the safety functions.

16 **4.18.1.2 Design Basis Events in Dry Cask Storage Systems**

17 Design basis events are considered in the design of dry cask storage systems in accordance
18 with NRC regulations in 10 CFR Part 72, "Licensing Requirements for the Independent Storage
19 of Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater Than
20 Class C Waste." These requirements are applicable for use of dry cask storage systems for
21 continued storage of spent fuel at all times, including during reactor operations, and all three
22 continued storage timeframes (i.e., short-term, long-term, and indefinite storage).

23 In the safety analysis reports for specifically licensed dry cask storage facilities, each facility
24 licensee examines four categories of design events as defined in American National Standards
25 Institute (ANSI) standard ANSI/ANS-57.9 (1992), which include normal, off-normal, and
26 accidental events. Design Events I represent those associated with normal operations of an
27 ISFSI. These events are expected to occur regularly or frequently. Examples of normal events
28 include receipt, inspection, unloading, maintenance, and loading of a transportation cask;
29 transfer of loaded storage casks to the storage pads; and handling of radioactive waste
30 generated as part of the operation. The impacts from these events are similar to those of
31 normal operations at the ISFSI.

32 Design Events II represent those associated with off-normal operations that can be expected to
33 occur with moderate frequency, approximately once per year. These events could result in
34 members of the general public being exposed to additional levels of radiation beyond those
35 associated with normal operations. Examples of these events include loss of external electrical
36 power for a limited duration, off-normal ambient temperatures, a cask drop from less than the

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1 design allowable lift height, and off-normal transporter operation. Credible off-normal events or
2 Design Events II rarely result in any occupational or offsite radiological consequences. During
3 normal operations and off-normal conditions, the requirements of 10 CFR Part 20 must be met.
4 In addition, the annual dose equivalent to any individual located beyond the controlled area
5 must not exceed 0.25 mSv (25 mrem) to the whole body, 0.75 mSv (75 mrem) to the thyroid,
6 and 0.25 mSv (25 mrem) to any other organ.

7 Design Events III represent infrequent events that could be reasonably expected to occur over
8 the lifetime of the dry cask storage facility, while Design Events IV represent extremely unlikely
9 events or design basis accidents that are postulated to occur because they establish the
10 conservative design basis for systems, structures, and components important to safety. Design
11 Events III and IV include more severe events, such as earthquakes, tornadoes and missiles
12 generated by natural phenomena, floods, fire (including wildfires) and explosions, lightning,
13 accidents at nearby sites (facilities), aircraft crashes, canister leakage under hypothetical
14 accident conditions, storage cask drop or tip-over, and loss of shielding. The dose from any
15 credible design basis accident to any individual located at or beyond the nearest boundary of
16 the controlled area may not exceed that specified in 10 CFR 72.106; specifically, the more
17 limiting total effective dose equivalent of 0.05 Sv (5 rem) or the sum of deep dose equivalent to
18 and the committed dose equivalent to any individual organ or tissue (other than eye lens) of
19 0.05 Sv (50 rem); a lens dose equivalent of 0.15 Sv (15 rem); and a shallow dose equivalent to
20 skin or any extremity of 0.5 Sv (50 rem).

21 The NRC assumes a DTS, or a facility with equivalent capabilities, will be needed to enable
22 retrieval of spent fuel for inspection or repackaging as the duration and quantity of fuel in dry
23 storage increases. A DTS would provide repackaging capability at all dry storage sites without
24 the need to return to a pool and contingency by enabling repackaging at ISFSI-only sites. A
25 DTS would allow onsite transfer of bare fuel assemblies from a source cask to a receiving cask
26 (Christensen et al. 2000). The source cask can be a storage cask or a transfer cask.
27 Confinement and shielding during fuel-transfer operations are provided by the concrete and
28 steel structure. The facility has several subsystems including a one used to transfer the fuel
29 assemblies.

30 Two accidents considered in the Topical Safety Analysis Report for the reference DTS are
31 representative of the types of accidents that could result in environmental impacts. These
32 accidents involve a stuck fuel assembly and a loss-of-confinement event.

33 A fuel assembly in a reference DTS can become stuck while being retrieved from a cask or
34 while being inserted into a cask for repackaging. Both of these scenarios can increase the dose
35 at the site boundary because of increased time of operation, and they represent the bounding
36 accidents. The design of the fuel-handling machine would have several safety features to make
37 these scenarios unlikely.

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1 Licensees of a reference DTS would be required to incorporate special recovery procedures in
2 the facilities operational plan to free the stuck assembly, including use of special equipment
3 through the penetrations in the wall with full viewing capabilities provided by closed-circuit
4 television cameras. A fuel assembly may be stuck part-way out because a foreign object is
5 between the assembly and the fuel cell or because of protrusions inside the cask. The situation
6 could be detected because loads recorded by the fuel-assembly load cell would be abnormal
7 and appropriate actions could be taken. There would not be any time limit to complete the
8 recovery operations because the assembly would be shielded. A special "recovery" cask may
9 be needed if the assembly is significantly distorted. The dose from these bounding scenarios
10 was estimated to be 0.47 mSv (47 mrem) at a distance of 100 m (330 ft) from the DTS,
11 assuming it would take 2 weeks to free the stuck fuel assembly.

12 In a loss-of-confinement event, TN-EPRI considered a scenario in which high-efficiency
13 particulate air filters are inoperable while the receiving cask is open and filled with 21 fuel
14 assemblies. The accident impact analysis is based on assuming that volatile radionuclides are
15 released from damaged fuel, including up to 10 percent of the noble gases (except that up to
16 30 percent of the krypton-85 is released), tritium, and iodine-129. The total dose at 100 m
17 (330 ft) is calculated to be 7.2 mSv (721 mrem).

18 Because the accident consequences would not exceed the NRC accident dose standard
19 contained in 10 CFR 72.106, the environmental impact of the potential accidents would be
20 SMALL.

21 Climate Change

22 Potential impacts on storing spent fuel in dry casks from variations in natural hazards resulting
23 from climate change are the same as those for spent fuel pool storage, which include increased
24 risk of potential flooding, submergence of structures by rising ocean levels, and competition for
25 limited water supply caused by droughts. As described in Section 2.2, dry cask storage occurs
26 during the short-term, long-term, and indefinite storage timeframes. Therefore, the analysis for
27 dry cask storage would extend beyond the 60-year short-term timeframe considered in the
28 spent fuel pool analysis. Projected future conditions include uncertainty.

29 The amount and rate of future climate change depends on current and future human-caused
30 emissions (GCRP 2009). Quantitative expressions, such as the amount of sea-level rise
31 identified in Section 4.18.1.1, may only extend to the end of the century, which reaches into the
32 long-term storage timeframe. To whatever extent climate change alters the magnitude and
33 frequency of natural phenomena during and beyond the short-term storage timeframe, the
34 NRC's oversight authority over the licensed facilities is the mechanism that addresses the
35 impact of natural hazards. Under current NRC regulations applicable to dry cask storage
36 facilities, the NRC requires that the vendor or licensee include design parameters on the ability
37 of the storage casks and spent fuel storage facilities to withstand severe weather conditions

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1 such as hurricanes, tornadoes, and floods. NRC-licensed spent fuel storage facilities are
2 designed to be robust. They are evaluated to ensure that performance of their safety systems,
3 structures, and components is maintained in response to natural phenomena hazards. In the
4 event of impacts induced by climate change, such as sea-level rise, the NRC regulations (e.g.,
5 10 CFR 72.172, “Corrective action”) require licensees to implement corrective actions to identify
6 and correct or mitigate conditions adverse to safety.

7 **Summary**

8 In summary, the dry storage cask systems and any DTSs are designed to withstand the design
9 basis accidents without losing the safety functions. In addition, the DTSs will have special
10 recovery procedures in the operation plan to recover from these design basis accidents if they
11 occur.

12 **4.18.1.3 Conclusion**

13 All NRC-licensed dry cask storage systems are designed to withstand all postulated design
14 basis accidents (Design Events III and IV) with no loss of the safety functions. Licensees of
15 DTSs are required to design the facilities so that all safety-related structures, systems, and
16 components can withstand the design basis accidents without compromising safety functions.
17 In addition, the potential effects of climate changes are considered. Based on the assessment,
18 the environmental impact of the design basis accidents is SMALL because safety-related
19 structures, systems, and components are designed to function during and after these accidents.

20 **4.18.2 Severe Accidents**

21 This section describes severe accidents, or beyond-design-basis accidents, which are accidents
22 that may challenge safety systems at a level much higher than expected, and it assesses the
23 environmental impact of severe accidents during continued storage. The probability and
24 consequences of severe accidents are usually considered by the NRC in probabilistic risk
25 assessments. The results of past studies for spent fuel pools and dry cask storage systems are
26 summarized in the following sections.

27 **4.18.2.1 Severe Accidents in Spent Fuel Pools**

28 The NRC examined the risk of severe accidents in spent fuel storage pools in WASH–1400
29 (NRC 1975). WASH–1400 states that spent fuel pool accidents can arise from either loss of
30 pool cooling, drainage of the pool, or drop of heavy objects into the pool. Subsequently, NRC
31 developed NUREG–1353 (NRC 1989), which examined several severe accidents that can affect
32 a spent fuel storage pool, namely loss of cooling or makeup water, inadvertent draining of the
33 pool, and structural failure of the pool due to missiles, aircraft crashes, heavy load (shipping
34 cask) drop, and beyond-design-basis earthquakes. NUREG–1738 (NRC 2001) examined spent
35 fuel pool accidents at decommissioning nuclear power plants. In addition to scenarios leading

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1 to fuel uncoverly in a pool (fuel being uncovered, e.g., because of loss of cooling, loss of offsite
2 power, heavy load drops, and fire), NUREG–1738 also examined the risk from design basis
3 seismic events, aircraft crashes, and tornadoes to a spent fuel pool. Assessments made in
4 these studies are briefly discussed in the following sections.

5 ***Internal Events***

6 In previous studies, the NRC considered a number of different types of equipment failure, or
7 internal events, that could lead to a severe accident in a spent fuel pool. For example, all spent
8 fuel pools have a spent fuel pool cooling and cleanup system. This safety function of this
9 system is intended to ensure that spent fuel remains cool and covered with water during all
10 storage conditions. In addition to General Design Criterion 2, which was summarized above,
11 pools are required to meet General Design Criterion 61 or equivalent principal design criteria;³
12 General Design Criterion 61 states, among other things, that systems for fuel storage and
13 handling shall be designed with residual heat removal capability to provide reliability and
14 testability that reflects the importance to safety of decay heat, other residual heat removal, and
15 prevention of significant reduction in fuel storage coolant inventory under accident conditions.

16 In general, this means that spent fuel pool cooling and cleanup systems are designed to satisfy
17 either of two bases: (1) the cooling portion of the system is designed to seismic Category I
18 (Regulatory Guide 1.29) (NRC 2007d), Quality Group C (Regulatory Guide 1.26) guidelines
19 (NRC 2007e); or (2) the following systems are designed to seismic Category I, Quality Group C
20 guidelines and are protected against tornadoes: the fuel pool makeup water system and its
21 source; and the fuel pool building and its ventilation and filtration system. Licensees prevent a
22 significant reduction in spent fuel pool coolant inventory by providing adequate makeup water
23 capability and designing the spent fuel pool cooling and cleanup system so that the coolant can
24 neither be drained nor siphoned below a specified level.

25 In a 2001 study (NRC 2001), the NRC concluded that the frequency of fuel uncoverly resulting
26 from loss of offsite power ranges from 1.1×10^{-7} /yr for power losses caused by severe weather
27 to 2.9×10^{-8} /yr for plant-related and grid-related events. Lack of external power would cause
28 cooling systems to fail, resulting in elevated pool water temperatures and accelerated
29 evaporation of the pool water. In the event of even a long-term loss of normal pool makeup
30 water capability at U.S. power plants, measures that were installed in response to the
31 September 11, 2001 terrorist attacks, plus additional measures that are required as a result of
32 the post-Fukushima March 12, 2012, mitigating strategies order, would ensure additional
33 defense-in-depth protection for cooling of the spent fuel. Therefore, the environmental risk of
34 spent fuel pool releases caused by loss of offsite power is considered to be small.

³ U.S. facilities for which construction permits were issued before 1971 have plant-specific principal design criteria, because the Atomic Energy Commission (NRC predecessor) had yet to develop generic requirements for facility design criteria at that time.

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1 A discussion of a postulated spent fuel pool fire resulting from loss of pool water, a limiting
2 severe accident in a spent fuel pool, is provided in Appendix F. Appendix F describes the
3 NRC's finding that the License Renewal GEIS conclusion that the probability-weighted
4 consequences of atmospheric releases, fallout onto open bodies of water, releases to
5 groundwater, and societal and economic impacts of spent fuel pool fires are SMALL are
6 applicable for a spent fuel pool fire during the period of continued storage.

7 ***External Events***

8 In previous studies, the NRC considered how different types of external events, such as
9 tornadoes, aircraft crashes, and seismic events, could lead to a severe accident in a spent fuel
10 pool. Each of these external events was evaluated to determine the frequency of fuel uncover
11 associated with the event. In its 2001 study (NRC 2001), the NRC determined that seismic
12 events had higher fuel uncover frequencies than aircraft crashes and tornadoes. For this
13 reason, the seismic event is summarized in this draft GEIS as a representative external event
14 causing a severe accident.

15 **As discussed in Appendix F, numerous NRC studies have concluded that S**spent fuel pool
16 structures are seismically robust and can withstand loads substantially beyond those for which
17 they are designed (NRC 2001). During an earthquake, the walls and floor of the pool would
18 carry the seismically induced hydrodynamic pressure from the pool water. Structural (floor,
19 liner, or walls) failure could occur in a beyond-design-basis earthquake, if the magnitude of the
20 event is significantly larger than that used in the design. If this occurred, water would rapidly
21 drain out of the pool. Only a small amount of water would remain and the spent fuel would be
22 uncovered and exposed to the air. A beyond-design-basis earthquake would also likely result in
23 the loss of electrical power, which, in addition to any damage to pool superstructure, would
24 cause a rise in fuel temperature due to loss of cooling. As discussed in Appendix F of this draft
25 GEIS, if the spent fuel heats to a temperature on the order of 1,000°C (1,832°F), zirconium
26 cladding on the spent fuel could ignite ("spent fuel pool zirconium fire"). Further, the spent fuel
27 rod could burst due to high temperature, which could cause the collapse of the spent fuel itself.
28 Radioactive aerosols and vapors released from the damaged spent fuel could be carried into
29 the surrounding environment. Based on the discussion in Appendix F, the frequency of fuel
30 being uncovered is very small and is between 5.8×10^{-7} and 2.4×10^{-6} /yr depending upon the
31 seismic hazard assessment.

32 Climate Change

33 In its 2001 study, the NRC determined that the overall frequency of catastrophic failure caused
34 by a tornado is extremely low (i.e., the calculated frequency of such as event is less than
35 10^{-9} /yr). The Global Change Research Program (GCRP 2009) determined that there has been
36 no clear trend in the frequency or strength of tornadoes since the 1950s for the United States as
37 a whole. Further, although climate models project future increases in the frequency of

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1 environmental conditions favorable to severe thunderstorms, the inability to adequately model
2 the small-scale conditions involved in thunderstorm development remains a limiting factor in
3 projecting the future character of severe thunderstorms (GCRP 2009). Therefore, the NRC
4 concludes that the risk posed by tornadoes will be comparable to the risk determined in the
5 2001 study through the short-term storage timeframe.

6 In its 2001 study, the NRC determined that the frequency of significant damage to spent fuel
7 pool support systems from straight-line winds, such as those from hurricanes, is very low. The
8 NRC also estimated that the fuel uncover frequency for loss of offsite power caused by severe
9 weather events was $1.1 \times 10^{-7}/\text{yr}$ (NRC 2001). The Global Change Research Program
10 determined that the United States and surrounding coastal waters may experience more intense
11 hurricanes, but not necessarily an increase in the number of these storms that make landfall
12 (GCRP 2009). An increase in the intensity of storms that make landfall as a result of climate
13 change may increase the likelihood of both structural failures in buildings housing spent fuel
14 pools and loss-of-offsite-power events. While the magnitude of the change in damage likelihood
15 cannot be quantitatively predicted at this time, an increase in storm intensity is not expected to
16 change the NRC's determination that the overall risk of external events on continued storage in
17 spent fuel pools is small.

18 **Summary**

19 The NRC has examined the risk of severe accidents in spent fuel pools in several studies over
20 the years. Based on these assessments, which include consideration of internal and external
21 event initiators, the NRC concludes that the risk of severe accidents in spent fuel pools is small.

22 **4.18.2.2 Severe Accidents in Dry Cask Storage Systems**

23 In March 2007, the NRC published a pilot probabilistic risk assessment of a dry cask storage
24 system at a nuclear power plant (NRC 2007f). The study covers various phases of the dry cask
25 storage process from loading fuel from the spent fuel pool, preparing the cask for storage and
26 transferring it outside the reactor building, moving the cask from the reactor building to the
27 storage pad, and storing the cask for 20 years on the storage pad. The study develops and
28 assesses a comprehensive list of initiating events, including dropping the cask during handling
29 and external events during onsite storage (such as earthquakes, floods, high winds, lightning
30 strikes, accidental aircraft crashes, and pipeline explosions). Potential cask failures from
31 mechanical and thermal loads are modeled. As shown in Table 18 of NUREG-1864, the largest
32 conditional consequences to an individual person of postulated accidents are expected to range
33 from 280 mrem, at a distance of less than 1 mi, up to 185 rem. One accident that results in
34 these consequences is a postulated 5.8-m (19-ft) drop of a multipurpose canister while being
35 lowered from the transfer cask to the storage cask. This drop can happen due to a design basis
36 earthquake during canister handling operation and has the most severe consequence of
37 potential drops. However, the probability of a release causing this dose consequence, which

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1 includes consideration of the initiating event frequency and conditional probability of release,
2 given the event occurs, is about 3×10^{-5} /yr. Therefore, although the consequence would
3 exceed NRC public dose standards contained in 10 CFR Part 20 (e.g., 100-mrem/yr dose limits
4 for members of the public), the likelihood of the event is very low. Therefore, the environmental
5 risk of an accident is SMALL.

6 Climate Change

7 In its 2007 pilot probabilistic risk assessment, described above, the NRC evaluated high winds
8 as an initiating event for accidents. The dry cask storage system that was evaluated
9 was the Holtec HI-STORM 100 system. This vertical cask system is in common use (see
10 Appendix G). The 2007 study concluded that winds in excess of 644 km/hr (400 mph) would be
11 required to cause storage cask tip-over, and winds in excess of 1,448 km/hr (900 mph) would
12 be required to propel a heavy object into a storage cask with enough force to cause significant
13 damage. There is no recorded evidence of tornado wind speeds in excess of 483 km/hr
14 (300 mph) (NRC 2007f). Very few hurricanes have achieved wind speeds of 310 km/hr
15 (190 mph) (Bender et al. 2010). Further, although climate models project future increases in the
16 frequency of environmental conditions favorable to severe thunderstorms, the inability to
17 adequately model the small-scale conditions involved in thunderstorm development remains a
18 limiting factor in projecting the future character of severe thunderstorms (GCRP 2009).
19 Therefore, the NRC concludes that the risk posed by high winds remains very low.

20 In the 2007 pilot probabilistic risk assessment, floods were considered, but deemed not able to
21 affect the plant that was the subject of the study. In general, the effects of floods on dry cask
22 storage systems can include cask sliding, tip-over, and blockage of ventilation ports by water
23 and silting of air passages. Other effects include water scouring below ISFSI foundations, burial
24 under debris, and severe temperature gradients resulting from rapid cooling from immersion in
25 water. However, based on the relatively slow rate of changes in flood risk over time, the NRC is
26 confident that any regulatory action that may be necessary will be taken in a timely manner to
27 ensure the safety of dry cask storage systems.

28 **Summary**

29 The NRC has examined the risk of severe accidents in dry cask storage systems. Based on
30 this assessment, which includes consideration of internal and external event initiators, the NRC
31 concludes that the risk of severe accidents in dry cask storage systems is small.

32 **4.18.2.3 Conclusion**

33 The NRC has examined the risk of severe accidents in spent fuel pools and dry cask storage
34 systems in several studies over the years. Based on these assessments, the NRC concludes
35 that the risk of severe accidents in spent fuel pools and dry cask storage systems is SMALL.

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1 **4.19 Potential Acts of Sabotage or Terrorism**

2 This section describes the environmental impacts of potential acts of sabotage or terrorism
3 involving the continued storage of spent fuel. The NRC regulates the security of radioactive
4 material as part of its domestic safeguards program.⁴ This program provides for regulatory
5 requirements; licensing and NRC oversight of facility access control; fitness for duty; material
6 control and accounting; and physical protection of spent fuel storage in onsite spent fuel pools,
7 at-reactor and away-from-reactor ISFSIs, and monitored retrievable storage installations.

8 This draft GEIS considers the potential risks of accidents and acts of sabotage or terrorism at
9 spent fuel storage facilities. In 1984 and 1990, the NRC provided some discussion of the
10 reasons why it believed that the possibility of a major accident or sabotage with offsite
11 radiological impacts at a spent fuel storage facility is extremely remote. In the 2010 final update
12 to the Waste Confidence Decision, the Commission gave considerable attention to the issue of
13 terrorism and spent fuel management (75 FR 81037). The Commission concluded that

14 [t]oday spent fuel is better protected than ever. The results of security
15 assessments, existing security regulations, and the additional protective and
16 mitigative measures imposed since September 11, 2001, provide high assurance
17 that the spent fuel in both spent fuel pools and in dry storage casks will be
18 adequately protected (75 FR 81037).

19 There is dispute among the United States Courts of Appeals as to whether NEPA analyses
20 require consideration of terrorist attacks. In *San Luis Obispo Mothers for Peace v. NRC*, the
21 Court of Appeals for the Ninth Circuit held that the NRC needed to consider the environmental
22 impacts of terrorism in its NEPA reviews. Whereas, in 2009, the Third Circuit Court of Appeals
23 upheld the NRC's position that terrorist attacks are too far removed from the natural or expected
24 consequences of agency action to require environmental analysis. Nonetheless, because some
25 continuing storage will occur within the Ninth Circuit, this draft GEIS discusses the
26 environmental impacts of a successful terrorist attack to comply with *San Luis Obispo Mothers
27 for Peace v. NRC*. The Ninth Circuit left to agency discretion the precise manner in which the
28 NRC undertakes a NEPA-terrorism review (NRC 2008c).

29 The environmental impact for a successful terrorist attack, if one occurs, could be significant
30 and destabilizing. The impact determinations for these attacks, however, are made with
31 consideration of the low probability of successful attack. The environmental impact
32 determination with respect to successful terrorist attacks, therefore, is based on risk, which
33 the NRC defines as the product of the probability, even if only a qualitative assessment of

⁴ The regulations in 10 CFR that are most applicable to the domestic safeguards program for spent nuclear fuel storage beyond the licensed life for operation are contained in Parts 11, 25, 26, 70, 72, 73, and 74.

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1 probability is available, and the consequences of a successful attack. This means that a high-
2 consequence, low-probability event could result in a small impact determination if the risk is
3 sufficiently low.

4 Impacts from terrorist acts for spent fuel pool storage only apply during the short-term
5 timeframe, and the impacts for dry cask storage are substantially the same across the three
6 timeframes. Therefore, this section of the GEIS follows a different format from other sections by
7 presenting the various accident types only once. The three storage timeframes (short-term,
8 long-term, and indefinite, as described in Chapter 1) apply as follows:

- 9 • During short-term storage, the probability and consequences of attacks on both the onsite
10 spent fuel pool and at-reactor ISFSI are considered.
- 11 • Beyond short-term storage, spent fuel is assumed to have been moved from the spent fuel
12 pool to an at-reactor ISFSI. Therefore, during long-term and indefinite storage timeframes,
13 only the probability and consequences of attacks on the at-reactor ISFSI are applicable.

14 **4.19.1 Attacks on Spent Fuel Pools**

15 The NRC has determined that the probability of a successful terrorist attack on a spent fuel
16 pool, although numerically indeterminable, is very low (73 FR 46204). To support this
17 conclusion, the NRC reviewed the characteristics of spent fuel pools discussed in Chapter 2,
18 and assessed how those features would deter terrorist attacks. Spent fuel pool structural
19 features, complemented by the deployment of effective and visible physical security protection
20 measures, described further below, are deterrents to terrorist attack. In addition, the emergency
21 procedures and Severe Accident Mitigation Alternatives guidelines developed for reactor
22 accidents provide a means for mitigating the potential consequences of terrorist attacks
23 (73 FR 46204).

24 Further, after the terrorist attacks of September 11, 2001, the NRC issued a series of Security
25 Orders to require licensees to implement additional interim security measures. Through these
26 Orders, the NRC supplemented the Design Basis Threat rule for radiological sabotage⁵ and
27 mandated specific licensee enhancement of security force training, access authorization, and
28 defensive strategies, plus additional mitigative measures. In addition, through generic
29 communications, the NRC specified expectations for enhanced notifications to the NRC for
30 certain security events or suspicious activities.

⁵ The definition for design basis threat for radiological sabotage is contained in 10 CFR 73.1(a)(1), which describes a determined violent external assault, attack by stealth, or deceptive actions, including diversionary actions, by an adversary force capable of operating in each of several modes and with attributes, assistance, and equipment as defined in the regulation. Under NRC's Design Basis Threat rule, licensees must be able to defend against these threats with high assurance.

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1 In response to the Security Orders, facility licensees revised their physical security plans,
2 access authorization programs, training and qualification plans, and safeguards contingency
3 plans. These revisions enhanced physical security with increased patrols, augmented security
4 forces and capabilities, **added** additional security posts, **added** additional physical barriers, and
5 **required** vehicle checks at greater standoff distances. Procedural enhancements resulted in
6 greater coordination with law enforcement authorities, augmented security and emergency
7 response training, equipment, and communication, and more restrictive site access controls for
8 personnel, including expanded, expedited, and more thorough employee background
9 investigations (NRC 2008c).

10 In 2007, the NRC amended its regulations in 10 CFR Part 73 governing licensee capability to
11 defend against design basis threats of radiological sabotage to capture experience and insights
12 gained by the NRC in implementing those requirements and to redefine the level of security
13 requirements necessary to ensure adequate protection of the public health and safety and
14 common defense and security (72 FR 12705). In 2008, the NRC amended its regulations in
15 10 CFR Parts 50, 52, 72, and 73 to codify the appropriate requirements from the Security
16 Orders and update those requirements with new insights gained from implementation of the
17 Security Orders, review of site security plans, implementation of the enhanced baseline
18 inspection program, and NRC evaluation of force-on-force exercises. This rulemaking also
19 updated the NRC's security regulatory framework for the licensing of new nuclear power plants
20 (74 FR 13926).

21 As discussed in more detail in the NRC's response to a draft U.S. Government Accountability
22 Office report on material control and accounting of spent fuel, with regard to theft and diversion
23 of spent fuel, the NRC believes that the likelihood that an adversary could steal spent fuel from
24 a spent fuel pool is extremely low, given the security and radiation protection measures in place,
25 the ease of detectability, and the physically disabling radiation from the spent fuel. Further, the
26 NRC also does not consider the threat of a knowledgeable, active insider stealing a spent fuel
27 rod, or portion thereof, to be credible (NRC 2005d).

28 The NRC has determined that these measures and national anti-terrorist measures to prevent,
29 for example, aircraft hijackings, coupled with the robust nature of spent fuel pools, make the
30 probability of a successful terrorist attack, although numerically indeterminable, very low
31 (73 FR 46204).

32 Although a successful act of sabotage or terrorism by an armed attack is low in probability, the
33 consequences such an act could be severe. A discussion of a postulated spent fuel pool fire
34 resulting from loss of pool water, which could result from a successful attack, is provided in
35 Appendix F. The conditional consequences described in Appendix F include downwind
36 collective radiation doses above one million person-rem, up to 192 early fatalities, and economic
37 damages exceeding \$70 billion. However, given the very low probability of successful attack
38 with these consequences, the NRC determined that the risk of successful attack is small.

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1 **4.19.2 Attacks on ISFSIs**

2 Before September 11, 2001, the NRC required ISFSI licensees to comply with the security
3 requirements specified in 10 CFR Part 72, "Licensing Requirements for the Independent
4 Storage of Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater
5 than Class C Waste," and 10 CFR Part 73, "Physical Protection of Plants and Materials." After
6 the attacks of September 11, 2001, the NRC continued to achieve this requisite assurance for
7 all facilities licensed to store spent fuel through a combination of the existing security regulations
8 and the issuance of Security Orders to individual ISFSI licensees. These orders ensured that a
9 consistent, comprehensive protective strategy was in place for all ISFSIs.

10 As discussed in Chapter 2, two types of ISFSI licenses (general and specific) are available for
11 the storage of spent fuel. Physical security requirements for these licensees appear in various
12 sections of 10 CFR Part 73, depending on the type of licensee. The regulations in
13 10 CFR 72.212(b)(9), "Conditions of General License Issued under §72.210," require general
14 ISFSI licensees to establish a physical protection program that protects the spent fuel against
15 the design basis threat for radiological sabotage in accordance with applicable security
16 requirements imposed on nuclear power reactor licensees under 10 CFR 73.55, "Requirements
17 for Physical Protection of Licensed Activities in Nuclear Power Reactors Against Radiological
18 Sabotage." For general-license ISFSIs, neither 10 CFR 72.212(b)(9) nor 10 CFR 73.55 imposes
19 a dose limit for security events (i.e., acts of radiological sabotage). For specifically-licensed
20 ISFSIs, NRC regulations at 10 CFR 73.51, "Requirements for the Physical Protection of Stored
21 Spent Nuclear Fuel and High-Level Radioactive Waste," require licensees to establish and
22 maintain a physical protection system that provides high assurance that licensed activities do
23 not constitute an unreasonable risk to public health and safety. The physical protection system
24 must protect against the loss of control of the ISFSI that could be sufficient to cause a radiation
25 exposure exceeding the dose described in 10 CFR 72.106 (NRC 2007i).

26 In general, the potential for theft or diversion of light water reactor spent fuel from the ISFSI with
27 the intent of using the contained special nuclear material for nuclear explosives is not
28 considered credible because of (1) the inherent protection afforded by the massive reinforced-
29 concrete storage module and the steel storage canister; (2) the unattractive form of the
30 contained special nuclear material, which is not readily separable from the radioactive fission
31 products; and (3) the immediate hazard posed by the high radiation levels of the spent fuel to
32 persons not provided radiation protection (NRC 1991a, 1992).

33 The immediate hazard posed by the high radiation levels of the spent fuel will, however,
34 diminish over time, depending on burnup and the level of radiation deemed to provide adequate
35 self-protection. Self-protection refers to the incapacitation inflicted upon a recipient from
36 inherent radiation emissions in a timeframe that prevents the recipient from completing an
37 intended task (Coates et al. 2005). This means that spent fuel could become more susceptible
38 to possible theft or diversion over long periods of time. This susceptibility depends on the

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1 burnup; higher burnup spent fuel provides adequate self-protection for longer time periods. The
2 Blue Ribbon Commission on America's Nuclear Future: Report to the Secretary of Energy
3 (2012) concluded:

4 As the duration of storage is extended, the amount of penetrating radiation
5 emitted by spent fuel will diminish. In the process, the fuel loses a degree of
6 "self-protection" against theft or diversion: in other words, unshielded exposure to
7 the fuel becomes less immediately debilitating and hence creates less of a
8 deterrent to handling by unauthorized persons. This means that over long time
9 periods (perhaps a century or more, depending on burnup and the level of
10 radiation that is deemed to provide adequate self-protection), the fuel could
11 become more susceptible to possible theft or diversion (although other
12 safeguards would remain in place). This in turn could change the security
13 requirements for older spent fuel. Extending storage to timeframes of more than
14 a century could thus require increasingly demanding and expensive security
15 protections at storage sites.

16 Furthermore, for nonlight water reactor spent fuel, the period of self-protection may be lower
17 than that of light water reactor spent fuel, depending on the burnup of the spent fuel and the
18 isotopic composition of the special nuclear material (i.e., the attractiveness of the material).

19 Thus, additional security requirements may be necessary in the future, if spent fuel remains in
20 storage for a substantial period of time. Therefore, it is reasonable to assume that, if necessary,
21 the NRC will issue orders or enhance its regulatory requirements for ISFSI security, as
22 appropriate, to ensure adequate protection of public health and safety and the common defense
23 and security.

24 The NRC has determined that the measures described above, coupled with the robust nature of
25 dry cask storage systems, make the probability of a successful terrorist attack, although
26 numerically indeterminable, very low.

27 After the NRC issued the license for the Diablo Canyon ISFSI in March 2004, the Ninth Circuit
28 reviewed the licensing action and, as discussed, required the NRC to consider terrorist acts in
29 its environmental review associated with this licensing action. In response to the Ninth Circuit
30 decision, the NRC supplemented its EA and finding of no significant impact for the Diablo
31 Canyon ISFSI to address the likelihood and the potential consequences of a terrorist attack
32 directed at the ISFSI (NRC 2007i):

33 The NRC staff reviewed the analyses performed for generic ISFSI security
34 assessments, and compared their assumptions to the relevant features of the
35 Diablo Canyon ISFSI. Based on this comparison, the staff determined that the
36 assumptions used in these generic security assessments regarding storage cask

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1 design, source term (amount of radioactive material released), and atmospheric
2 dispersion, were representative, and in some cases, conservative, relative to the
3 actual conditions at the Diablo Canyon ISFSI. In fact, because of the specific
4 characteristics of the spent fuel authorized for storage at the Diablo Canyon
5 ISFSI (lower burnup fuel), and the greater degree of dispersion of airborne
6 radioactive material likely to occur at the site, any dose to affected residents
7 nearest to the Diablo Canyon site will tend to be much lower than the doses
8 calculated for the generic assessments. Based on these considerations, the
9 dose to the nearest affected resident, from even the most severe plausible threat
10 scenarios – the ground assault and aircraft impact scenarios – would likely be
11 below 5 rem. In many scenarios, the hypothetical dose to an individual in the
12 affected population could be substantially less than 5 rem, or none at all. In
13 some situations, emergency planning actions could provide an additional
14 measure of protection to mitigate the consequences, in the unlikely event that a
15 successful attack were carried out at the Diablo Canyon ISFSI.

16 The specific dose results from the 2007 Diablo Canyon ISFSI EA Supplement were derived
17 from the generic analysis performed as part of ISFSI security assessments (NRC 2003). The
18 site-specific assumption in the EA Supplement was the distance to the nearest resident from the
19 Diablo Canyon ISFSI, which is about 2.4 km (1.5 mi). By comparison, this is more than the
20 average distance to nearby residences for other specifically-licensed ISFSIs, which is about
21 1.6 km (1 mi). Doses at closer residences could be larger, but are likely to remain well below
22 levels that could cause immediate health effects. The NRC took both the estimated dose and
23 the likelihood into consideration in making a finding of no significant impact. Thus, the NRC
24 determines that the environmental risk is SMALL. In addition, the environmental risk of impacts
25 on property and land resulting from downwind settling of airborne radioactive material would be
26 SMALL.

27 In February 2011, after a challenge to the Supplemental Environmental Assessment, the Ninth
28 Circuit issued a decision affirming its sufficiency (*San Luis Obispo Mothers for Peace v. Nuclear*
29 *Regulatory Commission* 2011). Among other things, the Court rejected an assertion that the
30 NRC had screened out from further review attacks that would not cause “early fatalities,”
31 thereby excluding scenarios that would cause land degradation or nonfatal illness. The Court
32 also concluded that the NRC had considered the relevant factors and reasonably concluded that
33 an EIS was not necessary.

34 **4.19.3 Conclusion**

35 The NRC finds that even though the environmental consequences of a successful attack on a
36 spent fuel pool during continued storage are large, the very low probability of a successful
37 attack ensures that the environmental risk is SMALL. Similarly, for operational ISFSIs during
38 continued storage, the NRC finds that the environmental risk is SMALL. Therefore, the

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1 continued storage of spent fuel will not constitute an unreasonable risk to the public health and
2 safety from acts of radiological sabotage theft or diversion of special nuclear material.

3 **4.20 Summary**

4 The impact determinations for at-reactor storage for each resource area for each timeframe are
5 summarized in Table 4-2. For most of the resource areas, the impact determinations for all
6 three timeframes are SMALL. Continued storage is not expected to adversely affect special
7 species and habitats. For accidents (design basis and severe) and terrorism considerations, the
8 environmental risks of continued storage are SMALL.

9 However, for a few resource areas, impact determinations are greater than SMALL and varied
10 for the three timeframes. For the long-term storage and indefinite storage timeframes, during
11 which ground disturbing activities may occur, impacts on historic and cultural resources range
12 from SMALL to LARGE, primarily because generally licensed facilities do not require site-
13 specific licensing reviews. The impacts from management and disposal of nonradioactive waste
14 would be SMALL for both the short-term and long-term timeframes but SMALL to MODERATE
15 for indefinite storage, because of the indefinite generation of these wastes potentially affecting
16 local and national disposal capacity.

17 **Table 4-2.** Summary of Environmental Impacts of Continued At-Reactors Storage

Resource Area	Short-Term Storage	Long-Term Storage	Indefinite Storage
Land Use	SMALL	SMALL	SMALL
Socioeconomics	SMALL	SMALL	SMALL
Environmental Justice	No disproportionately high and adverse impacts	No disproportionately high and adverse impacts	No disproportionately high and adverse impacts
Air Quality	SMALL	SMALL	SMALL
Air Emissions	SMALL	SMALL	SMALL
Thermal Releases	SMALL	SMALL	SMALL
Climate Change	SMALL	SMALL	SMALL
Geology and Soils	SMALL	SMALL	SMALL
Surface Water			
Quality	SMALL	SMALL	SMALL
Consumptive Use	SMALL	SMALL	SMALL
Groundwater			
Quality	SMALL	SMALL	SMALL
Consumptive Use	SMALL	SMALL	SMALL
Terrestrial Resources	SMALL	SMALL	SMALL

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1 **Table 4-2.** Summary of Environmental Impacts of Continued At-Reactor Storage (cont'd)

Resource Area	Short-Term Storage	Long-Term Storage	Indefinite Storage
Aquatic Ecology	SMALL	SMALL	SMALL
Special Status Species and Habitats	Impacts from the spent fuel pool would be determined as part of ESA Section 7 consultation; ISFSI operations are not likely to adversely affect	Not likely to adversely affect	Not likely to adversely affect
Historic and Cultural Resources	SMALL	SMALL, MODERATE, or LARGE	SMALL, MODERATE, or LARGE
Noise	SMALL	SMALL	SMALL
Aesthetics	SMALL	SMALL	SMALL
Waste Management			
LLW	SMALL	SMALL	SMALL
Mixed Waste	SMALL	SMALL	SMALL
Nonradioactive Waste	SMALL	SMALL	SMALL to MODERATE
Transportation			
Traffic	SMALL	SMALL	SMALL
Health Impacts	SMALL	SMALL	SMALL
Public and Occupational Health	SMALL	SMALL	SMALL
Accidents	SMALL	SMALL	SMALL
Sabotage or Terrorism	SMALL	SMALL	SMALL

2 **4.21 References**

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4 Procedures for Determining Eligibility for Access to or Control Over Special Nuclear Material."
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5.0 Environmental Impacts of Away-From-Reactor Storage

This chapter evaluates the environmental impacts of continued away-from-reactor storage of spent nuclear fuel (spent fuel) in an independent spent fuel storage installation (ISFSI) beyond the licensed life for operation of a reactor during the timeframes considered in this draft “Waste Confidence Generic Environmental Impact Statement” (draft GEIS).

No away-from-reactor ISFSIs of the size considered in this chapter have been constructed in the United States; however, the U.S. Nuclear Regulatory Commission (NRC) has issued a license to Private Fuel Storage, LLC (PFS) to construct and operate the Private Fuel Storage Facility (PFSF) on the Reservation of the Skull Valley Band of Goshute Indians in Tooele County, Utah (NRC 2006a).¹

For the purposes of evaluating the environmental impacts of continued storage of spent nuclear fuel at an away-from-reactor ISFSI, the NRC evaluates the impacts of a facility of the same size as the proposed PFS ISFSI. To perform this evaluation, the NRC makes the following assumptions:

- The ISFSI would have the same capacity as that analyzed for the PFSF, which was designed to store up to 40,000 MTU of spent fuel. This amount of spent fuel is more than half of the amount generated to date by commercial reactors in the United States, and more than twice as much as the amount in dry storage based on the most recent data (NRC 2013a). The amount of fuel storage (40,000 MTU) evaluated for the away-from-reactor ISFSI would represent all of the spent fuel from multiple reactor sites.
- The ISFSI would be of approximately the same physical size as that analyzed for the PFSF, which would have been built on a fenced 300-ha (820-ac) site; the actual storage facilities would have been built on a 40-ha (99-ac) portion of the site. The onsite facilities (e.g., buildings and storage pads) for the ISFSI would be similar to those for the PFSF. This aligns with the preceding assumption.

¹ Although a license was issued, the PFSF was never constructed, and by letter dated December 20, 2012, PFS requested that the NRC terminate the license for its proposed away-from-reactor ISFSI (PFS 2012). Although the facility was not constructed, the NRC determined that there was reasonable assurance that (1) the activities authorized by the PFSF license could be conducted without endangering the health and safety of the public, and (2) these activities would be conducted in compliance with the applicable regulations of 10 CFR Part 72 (NRC 2006a). See also Appendix B, Section B.3.2.2, of this draft GEIS. In addition, the U.S. Department of Energy has indicated that a storage facility of this type is part of its plan to respond to the recommendations of the “Blue Ribbon Commission on America’s Nuclear Future” (DOE 2013).

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Environmental Impacts of Away-From-Reactor Storage

- 1 • The ISFSI would require a dry transfer system (DTS) similar to that described in
2 Section 2.1.4 of this draft GEIS for the long-term storage and indefinite storage timeframes.
3 The DTS is assumed to be built sometime after the ISFSI is built because it would not be
4 needed immediately.
- 5 • Construction and operation of the ISFSI would be similar to that analyzed for the PFSF and
6 would require workforces similar in size to those described for the PFSF, consistent with the
7 first assumption above.
- 8 • No specific location is used by the NRC in the evaluation of an away-from-reactor ISFSI.
9 However, the location of the ISFSI would be chosen to meet the siting evaluation factors in
10 Title 10 of the *Code of Federal Regulations* Part 72, Subpart E (10 CFR Part 72, Subpart E).
11 For example, a site would be deemed unsuitable if adequate protection cannot be provided
12 for design basis external events. The NRC would also consider characteristics such as
13 population density, seismicity, and flooding potential as part of its evaluation of a proposed
14 ISFSI site.
- 15 • The location of the ISFSI would likely be chosen to minimize the environmental impacts.
16 Consultation, permitting, and other interactions with water-management agencies,
17 ecological resource management agencies, State or Tribal Historic Preservation Officers,
18 and others would ensure that significant impacts are avoided. The NRC assumes that an
19 applicant would consider these factors in selecting a site.

20 The NRC believes that these assumptions are reasonable and provide an acceptable basis for
21 developing a generic evaluation of away-from-reactor storage of spent fuel. The NRC makes no
22 assumptions about when the ISFSI might be built. While the NRC assumes that any proposed
23 away-from-reactor ISFSI would likely be similar to the assumed generic facility described above
24 from the standpoint of the size, operational characteristics, and location of the facility, the NRC
25 would evaluate the site-specific impacts of the construction and operation of any proposed
26 facility as part of that facility's licensing process. In this chapter, the term ISFSI refers to all of
27 the original facilities that would be built (i.e., storage pads, casks, and canister transfer building),
28 and the DTS is addressed separately because the NRC assumes that it would be added after
29 the ISFSI would be placed into operation.

30 In addition to the assumptions discussed above, the analysis of the environmental impacts of an
31 away-from-reactor ISFSI are based, in general, on the description of the affected environment
32 provided and discussed in Sections 3.1 through 3.16 for at-reactor spent fuel storage. However,
33 some aspects of the discussions are not applicable, or are not applicable in the same way, for
34 an away-from-reactor ISFSI. The NRC analysis will be based on the following differences:

- 35 • Portions of the discussion of at-reactor spent fuel storage address facilities that are in semi-
36 urban areas. However, the NRC assumes that an away-from-reactor ISFSI will be built in an
37 area of low population density.

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Environmental Impacts of Away-From-Reactor Storage

- 1 • Portions of the discussion of at-reactor spent fuel storage start from an assumption that
2 socioeconomic conditions and infrastructure (e.g., access roads) have been established
3 prior to the short-term storage timeframe due to the presence of an existing nuclear power
4 plant. For an away-from-reactor ISFSI, the NRC assumes conditions typical in remote areas
5 (e.g., limited pre-existing road infrastructure).
- 6 • Portions of the discussion of at-reactor spent fuel storage start from an assumption that
7 certain site conditions (e.g., proximity to major waterbodies and associated historic and
8 cultural resources) are related to the way nuclear power plants are sited. Those conditions
9 likely would not be applicable to an away-from-reactor ISFSI. For an away-from-reactor
10 ISFSI, NRC assumes that the site selection would be adjusted to minimize impacts on local
11 resources, including historic and cultural resources and special status species and habitats,
12 while acknowledging that in some cases avoiding impacts may not be possible.
- 13 • Portions of the discussion of at-reactor spent fuel storage assume pre-existing programs
14 associated with operating reactors (e.g., radiological environmental monitoring program and
15 monitoring for decommissioning) that would exist in a somewhat different form for an away-
16 from-reactor ISFSI. For an away-from-reactor facility, NRC bases its evaluation of the
17 impacts of public and occupational doses on the limits and radiological monitoring
18 requirements in 10 CFR Part 72 and 10 CFR Part 20 that are applicable to an away-from-
19 reactor ISFSI.
- 20 • Portions of the discussion of at-reactor spent fuel storage focus on issues related to reactor
21 plant systems (e.g., cooling-water systems, liquid and gaseous radioactive waste, and
22 transmission lines), which would not be applicable for an away-from-reactor ISFSI. For an
23 away-from-reactor facility, NRC bases its evaluation of impacts on the systems and
24 supporting facilities that are expected at such an installation.

25 With these exceptions, the NRC used the descriptions of the affected environment in
26 Sections 3.1 through 3.16 in its evaluation of the environmental impacts of an away-from-reactor
27 ISFSI.

28 Major features of the away-from-reactor ISFSI include the canister transfer building, the DTS,
29 the storage casks, and the storage pads. The canister transfer building is used to receive
30 shipping casks and to move spent fuel canisters from the shipping casks to storage casks for
31 movement to the pads. The building would also be used to move spent fuel canisters from the
32 storage casks into shipping casks for the shipment of the spent fuel to the repository. The
33 canister transfer building would be used in the early years and toward the end of the ISFSI's
34 operational period, recognizing that the shipment of the fuel from the reactors to the ISFSI might
35 occur over a period of 20 or more years. Shipment of the fuel from the ISFSI to the repository
36 would occur over a similar timeframe. The DTS is designed to handle spent fuel outside the
37 storage canister, i.e., to move the fuel into a new canister if monitoring identifies the need to

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Environmental Impacts of Away-From-Reactor Storage

- 1 replace the old canister. The DTS is used on an as-needed basis and would likely be built
2 sometime after the ISFSI begins operations and would be used over the life of the ISFSI.
- 3 The potential impacts from transportation of spent fuel from an away-from-reactor ISFSI to a
4 repository are evaluated in Chapter 6 as part of cumulative impacts. Transportation of spent
5 fuel to an away-from-reactor storage facility is evaluated in Section 5.16.
- 6 The NRC does not evaluate the impacts of decommissioning of the away-from-reactor ISFSI
7 and DTS in this chapter. The impacts of these activities are considered in the cumulative
8 impacts analysis in Chapter 6.
- 9 For the short-term storage timeframe (see Section 1.8.2), the NRC evaluates the impacts of
10 continued storage of spent fuel 60 years beyond the licensed life for operations of a reference
11 reactor. The NRC assumes that a repository would become available by the end of this 60-year
12 timeframe.
- 13 Short-term storage of spent fuel for 60 years beyond licensed life for operations at an away-
14 from-reactor ISFSI includes the following:
- 15 • construction and continued operation of the ISFSI
 - 16 • routine maintenance and monitoring of the ISFSI
 - 17 • cask handling and transfers
- 18 For the long-term storage timeframe, the NRC evaluates the impacts of continued storage for
19 another 100 years after short-term storage. The NRC assumes that a repository would become
20 available by the end of this 100-year timeframe and that the oldest fuel would be transferred to
21 the repository first.
- 22 Long-term storage activities include the following:
- 23 • continued operation and routine maintenance and monitoring of the away-from-reactor
24 ISFSI
 - 25 • construction and operation of a DTS²
 - 26 • one-time replacement of the ISFSI (i.e., replacement of casks and canisters, concrete pads,
27 and canister transfer building) and the DTS (see Section 1.8.2)

² A licensee would have to request authorization from the NRC to build and operate the DTS, either during initial licensing of the ISFSI, or as a later, separate action. As part of its review of such a request, the NRC would have to consider any associated environmental impacts pursuant to 10 CFR Part 51.

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Environmental Impacts of Away-From-Reactor Storage

1 For the indefinite storage timeframe, the NRC has also evaluated the environmental
2 consequences within each resource area for a scenario assuming a repository does not become
3 available, thus requiring indefinite onsite storage. Although the NRC does not believe this
4 scenario is reasonably foreseeable (see Section 1.2 of this draft GEIS), impact determinations
5 for indefinite storage and fuel handling at an away-from-reactor ISFSI have been made for each
6 resource area. The activities associated with indefinite storage are the same as those for the
7 long-term storage timeframe, except that they would occur repeatedly due to the lack of a
8 repository. As discussed in Chapter 1, the ISFSI (i.e., casks and canisters, concrete pads, and
9 canister transfer building) and the DTS would be replaced on a 100-year cycle.

10 Sections 5.1 through 5.19 evaluate potential impacts on various resource areas, such as land
11 use, air quality, and water quality. Within each resource area, the NRC provides an analysis of
12 the potential impacts and an impact determination – SMALL, MODERATE, LARGE – for each
13 timeframe. For some resource areas, the impact determination language is specific to the
14 authorizing regulation or statute (e.g., “not likely to adversely affect” for endangered species).
15 Section 5.20 provides a summary of the environmental impacts.

16 **5.1 Land Use**

17 This section describes land-use impacts caused by the continued storage of spent fuel at an
18 away-from-reactor ISFSI.

19 **5.1.1 Short-Term Storage**

20 The environmental impacts on land use from the construction and operation of an away-from-
21 reactor storage facility are based on a facility similar to the PFSF (NRC 2001), built at a location
22 selected based on the assumptions presented above. The ISFSI would be designed to store up
23 to 40,000 MTU of spent fuel on a fenced 300-ha (820-ac) site. Storage pads for the canisters
24 and some support facilities would be located on a 40-ha (99-ac) restricted access area within
25 the site.

26 Construction activities associated with the ISFSI would be limited to the immediate area of the
27 ISFSI site and would primarily consist of clearing, excavation, and grading of the 40-ha [99-ac]
28 restricted access area where the storage pads and major buildings would be located. In
29 addition, one or more access roads and a rail spur would likely have to be either built or
30 improved. Based on its past experience and judgment, the NRC assumes that (1) disturbed
31 areas around the ISFSI site and associated corridors would be graded and reseeded after
32 construction is completed, (2) permits³ would require best management practices (BMPs) such
33 as construction of flood diversion berms to control erosion and the installation of silt fencing and

³ For example, the licensee of each site would have to obtain a National Pollutant Discharge Elimination System permit that would include requirements to minimize the impacts of stormwater runoff.

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1 sediments traps to stabilize disturbed soils ~~would be implemented~~ to reduce land-use impacts,
2 and (3) the 40-ha (99--ac) restricted access area would be enclosed with chain-link security
3 fencing. For the PFSF, the total amount of land disturbed for construction, including the access
4 road and rail line, was 408 ha (1,008 ac) and the rail line represented more than three-quarters
5 of the land disturbed. Of the land disturbed, 288 ha (713 ac) was to be revegetated after
6 construction and 120 ha (295 ac) was expected to remain cleared; the rail line represented
7 more than half of that value (NRC 2001). Although these numbers are specific to the PFSF
8 analysis, based on the assumptions presented in the introduction to this chapter, they provide a
9 reasonable representation of the amount of land disturbance that could be expected at another
10 location because the rail line was fairly long at 51 km (32 mi).

11 Construction of the proposed ISFSI would change the nature of land use within the site
12 boundary and along the access corridors. While this change would be qualitatively substantial
13 (e.g., from agricultural to industrial), the land parcel is assumed to be sufficiently remote and
14 relatively small (compared, for example, to any surrounding county) ~~so~~ that no quantitatively
15 significant impact would occur. By way of comparison, for the Levy Nuclear Plant, the NRC
16 concluded that the land-use impacts for the plant (not including transmission lines) “would not
17 noticeably alter the existing land uses within the vicinity and region.” The Levy project (not
18 including transmission lines) would have affected just over 405 ha (1,000 ac) (NRC 2012b).

19 Operation of the proposed ISFSI would involve transportation of spent fuel from reactors to the
20 ISFSI and receiving, transferring, and storing the spent fuel. Impacts on land use during ISFSI
21 operations would create no additional impacts on land use beyond those for the construction of
22 the facility. This generic analysis and associated findings are consistent with the findings for the
23 PFSF (NRC 2001).

24 Based on its review, the NRC concludes that the impacts on land use from the construction and
25 operation of an away-from-reactor ISFSI would be SMALL. This is because the land parcel for
26 the ISFSI is assumed to be remote and relatively small.

27 **5.1.2 Long-Term Storage**

28 As discussed in the introduction to this chapter, the NRC assumes that a DTS is constructed as
29 part of an away-from-reactor ISFSI. The NRC also assumes that the DTS will be built inside the
30 confines of the ISFSI's 40-ha (99-ac) restricted area – a reasonable assumption considering the
31 small area (0.04 ha [0.1 ac]) required for the DTS basemat and 0.7 ha (2 ac) for the DTS
32 security zone. The DTS would be used to facilitate transfer of the spent fuel canister from one
33 cask to another, retrieve and repackage spent fuel, or replace damaged canisters or packages
34 identified during visual inspections. Construction and operation of a DTS at an away-from-
35 reactor ISFSI would be based on Section 2.1.4 of this draft GEIS.

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Environmental Impacts of Away-From-Reactor Storage

1 By comparison, the canister transfer building at the PFSF would have been a fully enclosed
2 high-bay building equipped with cask transfer and handling equipment (e.g., overhead and
3 gantry cranes) and radiation-shielded transfer cells for transferring the spent fuel canisters from
4 shipping casks to the storage casks (NRC 2001). The building would have occupied about
5 0.5 ha (1.2 ac) within the 40-ha (99-ac) restricted access area where the storage pads, major
6 buildings, and access roads would have been located (NRC 2001). It is possible such a
7 building would be equipped or could be retrofitted with the necessary equipment for retrieval
8 and repackaging of spent fuel. However, for the purposes of the analysis in this draft GEIS, the
9 NRC assumes that a separate DTS will be constructed.

10 The NRC assumes that construction of a DTS would take 1 to 2 years based on a construction
11 schedule similar to that for the canister transfer building at the PFSF, which was estimated to
12 take approximately 18 months (NRC 2001). Construction equipment would be used to grade
13 and level the DTS site and excavate the facility foundation. Construction of the DTS structures
14 would disturb about 0.04 ha (0.1 ac) of land. In addition, the NRC expects that land adjacent to
15 a DTS would be disturbed for a construction laydown area. Based on its past experience and
16 judgment, the NRC assumes that after the construction of the DTS is completed (i.e., about 1 to
17 2 years), the construction laydown area would be reclaimed and revegetated. The DTS would
18 be built within an area for which access is already restricted, and it would represent a small
19 increase in the amount of land that is disturbed within that restricted area.

20 The NRC assumes that aging management would require the replacement of an away-from-
21 reactor ISFSI (i.e., the concrete storage casks and concrete storage pads, and canister transfer
22 building) and the DTS during long-term storage. The replacement facilities would likely be
23 constructed on land near the existing facilities. The old facilities would most likely be
24 demolished and the land reclaimed. Regardless, this land would be inside the 40-ha (99-ac)
25 restricted area and it would be unavailable for other uses for as long as the ISFSI exists.

26 In conclusion, construction of a DTS would disturb a small portion of the land committed for an
27 away-from-reactor ISFSI. Operational impacts would include continuing to restrict access to the
28 facility site and use of the site for spent fuel transfer, handling, repackaging, and aging
29 management. To minimize land-use impacts from replacing storage casks, storage pads, the
30 canister transfer building, and the DTS, replacement facilities would likely be constructed on
31 land near the existing facilities. Therefore, the NRC concludes that the impact on land use from
32 long-term storage of spent fuel at an away-from-reactor ISFSI would be SMALL.

33 **5.1.3 Indefinite Storage**

34 This section describes the potential environmental impacts on land use if a repository is not
35 available to accept spent fuel. For this analysis, the NRC assumes that spent fuel would
36 continue to be stored at an away-from-reactor ISFSI indefinitely.

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1 The environmental impacts on land use from continued operation of dry cask storage of spent
2 fuel at an away-from-reactor ISFSI if a repository is not available would be similar to those
3 described in Section 5.1.2. All operations and maintenance activities would occur inside the
4 40-ha (99-ac) restricted area, which would remain unavailable for other uses for as long as the
5 ISFSI exists. These activities would occur repeatedly because the spent fuel would remain at
6 the facility indefinitely.

7 In conclusion, continued storage of spent fuel in an away-from-reactor ISFSI indefinitely (i.e., if a
8 repository is not available) would affect only a small portion of the total land area developed for
9 the storage facility and would not change land-use conditions. Therefore, NRC concludes that
10 the environmental impacts on land use from indefinite storage of spent fuel at an away-from-
11 reactor ISFSI would be SMALL.

12 **5.2 Socioeconomics**

13 This section describes socioeconomic impacts caused by the continued storage of spent fuel at
14 an away-from-reactor ISFSI. Several types of impacts could occur, including impacts on
15 population, economy, housing, education, and public services.

16 **5.2.1 Short-Term Storage**

17 Construction activities would be temporary and would occur mainly within the boundaries of the
18 ISFSI site. As discussed in the introduction to this chapter, the NRC used the characteristics of
19 the PFSF (e.g., land area affected and size of workforce) in its analyses. There would be
20 incremental changes to offsite services to support construction activities, such as the
21 transportation of construction materials. Most of the construction workforce (255 workers at its
22 peak) is expected to come from within the region, and those workers who might relocate to the
23 region would represent a small percentage of the surrounding area's population base. Because
24 of the relatively short duration of the construction project, few, if any, of the workers who migrate
25 to work at the site would be accompanied by their families. As a result, the impacts on housing,
26 education, and public services are expected to be minor. Aside from the direct impacts
27 associated with the project, there would also be indirect impacts from jobs created in the area.
28 For example, the purchase of goods by workers onsite and in the local community could create
29 additional jobs. However, unlike jobs associated directly with the construction of the ISFSI,
30 indirect jobs are more likely to be filled by local residents. Because the number of workers is
31 small, the impacts on the local and regional economy and services would be minor.

32 During ISFSI operation, employees would continue to maintain, monitor, and inspect the facility.
33 The NRC estimates that the number of operations workers would be around 43 based on the
34 PFSF environmental impact statement (EIS) (NRC 2001). In contrast to construction, for which
35 workers may or may not relocate, workers employed for the operation of the storage facility, if

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1 they were not from the local area, would be expected to move into the area with their families.
2 Again, because the number of workers is small, the impacts on the population and services
3 would be minor.

4 Local and State governmental agencies would receive tax payments from the ISFSI licensee.
5 The impact of the payments would depend on a number of factors, including the pre-existing
6 economic conditions. If the local jurisdiction(s) already have a significant tax base, then the
7 addition of taxes from the ISFSI would have a minor beneficial impact. But if the pre-existing
8 local tax base was small, then the NRC would conclude that the new tax revenue would have a
9 significant beneficial impact. For the PFSF, the NRC concluded that there would be a large
10 impact on the Skull Valley Band and on Tooele County from the payments made by PFS (NRC
11 2001). Based on the assumption that any away-from-reactor ISFSI would be built in an area
12 with low population density, the NRC concludes that local impacts on the economy would be
13 significant and beneficial, but that the beneficial impacts beyond the host jurisdiction would be
14 minor.

15 In the PFSF EIS, the NRC concluded that construction and operation of away-from-reactor
16 storage would have SMALL impacts on the local population, housing, education, and public
17 services (NRC 2001). Considering the very sparse population around the PFS site (30 persons
18 on the Reservation and a total of about 150 persons in all of Skull Valley), the NRC concludes
19 that the impacts at any site would be similar to those described for the PFSF. Based on the
20 small workforce required for construction and operations of an away-from-reactor facility, and
21 any associated indirect impacts on public services, housing, and education, the NRC concludes
22 that the impacts of construction and operation of a storage facility on those resources would be
23 SMALL. Beneficial impacts on the economy would be LARGE in the local area.

24 **5.2.2 Long-Term Storage**

25 A DTS constructed as part of an away-from-reactor ISFSI would be used to facilitate the
26 replacement of spent fuel canisters as part of aging management practices. The construction of
27 the facility would require a workforce smaller than that required for construction of an away-
28 from-reactor ISFSI. Similar to the construction of the ISFSI, the workers would come from a
29 combination of the already-existing workforce or commute into the area from surrounding
30 communities, but workers would be unlikely to move into the area for DTS construction because
31 of the short duration of the project. Therefore, the impacts from the construction of the DTS are
32 bounded by those associated with the construction of the ISFSI discussed in Section 5.2.1.

33 A staged approach to aging management would require the replacement of an away-from-
34 reactor ISFSI (e.g., the concrete storage casks, concrete storage pads, and canister transfer
35 building) and replacement of the DTS during the long-term storage timeframe. The workforce
36 related to the replacement of these structures and components would be similar to or less than
37 the workforce required for the original construction of the ISFSI, depending on how the work is

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1 spread out over time. Therefore, the socioeconomic impacts of these workers would be similar
2 to or less than the impacts of the original construction of the ISFSI. In addition, the operational
3 and maintenance activities begun during the short-term timeframe would continue, as would the
4 tax payments to local jurisdictions.

5 As discussed above, the impacts from long-term operation and maintenance of the ISFSI are
6 bounded by those described in Section 5.2.1. Therefore, the NRC concludes the
7 socioeconomic impacts on public services, housing, and education from the transfer, handling,
8 and aging management of an away-from-reactor storage facility would be SMALL. Beneficial
9 impacts on the economy would be LARGE in the local area.

10 **5.2.3 Indefinite Storage**

11 This section evaluates the socioeconomic impacts of away-from-reactor storage assuming a
12 repository does not become available. The same operations and maintenance activities
13 described in Section 5.2.2 occur repeatedly because the spent fuel remains at the facility
14 indefinitely. Therefore, the NRC concludes that the socioeconomic impacts on public services,
15 housing, and education from indefinite storage would be SMALL. Beneficial impacts on the
16 economy would be LARGE in the local area.

17 **5.3 Environmental Justice**

18 This section describes impacts on minority and low-income populations caused by the
19 continued storage of spent fuel at an away-from-reactor ISFSI.

20 See Sections 3.3 and 4.3 for discussion of the approach the NRC uses to evaluate issues
21 related to environmental justice. The discussion in both sections is also applicable to the
22 consideration of environmental justice for an away-from-reactor ISFSI.

23 In most cases, NRC environmental justice analyses are limited to evaluating the human health
24 effects of the proposed licensing action and the potential for minority and low-income
25 populations to be affected. Issues related to environmental justice and demographic conditions
26 (i.e., the presence of potentially affected minority and low-income populations) differ from site to
27 site, and environmental justice issues and concerns usually cannot be resolved generically. In
28 each site-specific review, the NRC addresses environmental justice issues and concerns during
29 the environmental review by identifying potentially affected minority and low-income
30 populations. The NRC identifies minority and low-income populations by examining any
31 potential human health or environmental effects on these populations to determine if these
32 effects may be disproportionately high and adverse. Resource areas that might create human
33 health and other environmental impacts include, but are not limited to, air quality, land use,
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1 water, and ecological resources. Consequently, environmental justice, as well as other
2 socioeconomic issues, is normally considered in site-specific environmental reviews
3 (69 FR 52040).

4 In the present case, however, the NRC has determined that it can provide an assessment of the
5 environmental justice impacts for the construction and operation of an away-from-reactor ISFSI.
6 As previously stated in Chapters 2 and 3, this draft GEIS and the Waste Confidence rule are not
7 licensing actions and do not authorize the continued storage of spent fuel. The environmental
8 analysis in this draft GEIS fulfills a small part of the NRC's National Environmental Policy Act of
9 1969, as amended (NEPA) obligation with respect to the licensing or relicensing of an away-
10 from-reactor ISFSI. Further, the site-specific NEPA analysis that is required prior to an NRC
11 licensing action will include a discussion of the impacts on minority and low-income populations,
12 and will appropriately focus on the NRC decision directly related to specific licensing actions.
13 As with all other resource areas, this site-specific analysis will allow the NRC to make an impact
14 determination with respect to environmental justice for each NRC licensing action. For the
15 purposes of this draft GEIS, a generic assessment of the environmental justice impacts during
16 continued storage at an away-from-reactor ISFSI is possible because the NRC understands
17 how such a facility will be sited.

18 **5.3.1 Short-Term Storage**

19 The construction and short-term operation of an away-from-reactor ISFSI could raise concerns
20 related to environmental justice.

21 As previously explained in Section 5.2.1, the small workforce is expected to have minimal
22 effects on the local economy and services. There may be some beneficial impacts from
23 increased job opportunities, and there would be beneficial impacts from the taxes paid to local
24 jurisdictions. But the NRC does not expect there to be any disproportionately high and adverse
25 impacts on any minority or low-income populations in the area.

26 Radiation doses to surrounding populations would be maintained within regulatory limits (e.g.,
27 10 CFR Part 20), ensuring minor impacts. In addition, the licensee is required by 10 CFR
28 72.44(d)(2) to implement an environmental monitoring program to ensure compliance with
29 effluent limitations. Based on a review of recent radiological environmental monitoring program
30 (REMP) reports, human health impacts would not be expected in special pathway receptor
31 populations living near a nuclear power plant as a result of subsistence consumption of water,
32 local food, fish, and wildlife during continued storage of spent fuel. Unlike the operation of
33 nuclear reactors, the operation of the ISFSI is not expected to have any routine radiological
34 effluents. Therefore, the results for reactors bound the results for the away-from-reactor ISFSI.
35 The NRC concludes that there would not be any disproportionately high and adverse
36 radiological human health or environmental impacts on any minority or low-income populations
37 in the area during short-term storage.

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1 Regarding visual impacts, the NRC expects the canister transfer building to be the largest
2 building on the site. For the PFSF, this building would have been approximately 60 m (200 ft)
3 wide, 80 m (260 ft) long, and 27 m (90 ft) high (NRC 2001). Using the 300-ha (820-ac) site area
4 for the PFSF as a guide, the site boundary would be approximately 0.8 km (0.5 mi) from the
5 facility. At this distance the NRC concludes that visual impacts on nearby residents would be
6 minimal. Depending on the location of minority or low-income populations, such populations
7 could experience an adverse impact. However, it would be a minor impact, so it would not meet
8 the criterion of a disproportionately high and adverse impact.

9 Regarding noise, in Section 5.13 the NRC concludes that impacts near the site could be
10 MODERATE at times during construction and operations. If minority or low-income populations
11 are concentrated near the site boundary or transportation routes, they could experience
12 noticeable impacts to a greater degree than populations living farther away. But the NRC does
13 not expect that these impacts would be disproportionately high and adverse. However, based
14 on the NRC's experience with the Louisiana Energy Services Claiborne Enrichment Center, if
15 impacts appeared to be disproportionately high and adverse, it is likely that the facility would be
16 relocated or plans modified to mitigate the impacts. The Louisiana Energy Services facility was
17 originally proposed for a location in Louisiana. However, the applicant eventually decided to
18 withdraw its application (LES 1998; NRC 1998). A key outstanding issue for this project was an
19 environmental justice concern identified during the licensing review.

20 The adverse impacts on air quality, land use, and socioeconomics are discussed elsewhere in
21 this chapter and the NRC concluded that these impacts would be SMALL. However, to reach a
22 conclusion regarding environmental justice, the NRC must consider whether minority or low-
23 income populations would be subjected to disproportionately high and adverse impacts.

24 During the environmental review for a specific ISFSI, the NRC would collect information about
25 nearby minority or low-income populations and any special characteristics (e.g., subsistence
26 fishing) of those populations. The NRC would use this information to evaluate the potential for
27 disproportionately high and adverse impacts on those populations. Such a review was
28 performed for the PFSF and the NRC concluded that "no disproportionately high and adverse
29 impacts will occur to the Skull Valley Band or to minority and low income populations living near
30 the proposed rail routes from the proposed action" (NRC 2001). The NRC notes that this
31 conclusion was reached in a case in which the nearest population was a minority and low-
32 income population.

33 For this generic analysis, it is not possible to define the characteristics of minority or low-income
34 populations around the ISFSI and the transportation corridor. However, environmental justice
35 would be one of the factors considered in the siting and licensing of any ISFSI. Using past
36 licensing experience as an indicator, disproportionately high impacts on minority or low-income
37 populations would likely be avoided. Other than the PFS EIS, other examples include the
38 licensing for new reactors (projects on a much larger scale in terms of most impact areas),

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1 license renewal for operating reactors, and the licensing review for the Louisiana Energy
2 Services Claiborne Enrichment Center, as discussed above.

3 Based on this experience, the NRC concludes that, while it is possible that an away-from-
4 reactor ISFSI could raise environmental justice concerns, the process of siting and licensing
5 such a project would be expected to ensure that any such issues are addressed before a facility
6 is licensed and that there would be no significant environmental justice impacts. Therefore,
7 impacts associated with the construction and operation of an away-from-reactor ISFSI could be
8 disproportionate, but are not expected to be disproportionately high and adverse.

9 **5.3.2 Long-Term Storage**

10 The construction of a DTS would occur within the facility boundaries. NRC authorization to
11 construct and operate a DTS would constitute a Federal action under the NEPA and would be
12 addressed through a site-specific analysis that would include an analysis of the potential effect
13 on minority and low-income populations. The environmental review for the DTS would not rely
14 on the analysis in this draft GEIS, because the site-specific NEPA analysis would consider the
15 site-specific impacts on minority and low-income populations.

16 Impacts from construction of the DTS would include the potential for an increase in labor
17 demand similar to that described under the initial construction of the away-from-reactor facility,
18 although on a somewhat smaller scale (60 to 80 workers, see Sections 4.2.2 and 4.3.2). The
19 activities associated with building an away-from-reactor ISFSI are described in the PFSF EIS
20 (NRC 2001). Because building the DTS is a much smaller project and would occur within the
21 ISFSI protected area, the description from the PFSF EIS activities bound the activities
22 necessary to build the DTS. Therefore, the NRC concludes that the impacts from construction
23 of the DTS would be bounded by the impacts from the construction of the away-from-reactor
24 ISFSI, as discussed in Section 5.3.1.

25 Aging management would include continued monitoring, maintenance, and a staged approach
26 to replacement of ISFSI facilities and components (e.g., casks, pads, and canister transfer
27 building) and the DTS. Activities associated with aging management are described in
28 Sections 4.1.2, 4.15.2, and 5.1.2. The activities would occur over the duration of operation and
29 be contained within the restricted area of the ISFSI. In addition, the dose at the site boundary
30 would decrease over time because of the decay of the radioactive materials in storage.

31 Due to the passive nature of operations, and the temporary nature of any construction
32 associated with the DTS and replacement of the ISFSI and the DTS, and based on the analysis
33 in Section 5.3.1, the NRC concludes the impacts on minority and low-income populations would
34 not be disproportionately high and adverse.

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1 **5.3.3 Indefinite Storage**

2 The environmental impacts on minority and low-income populations if a repository is not
3 available to accept spent fuel and away-from-reactor storage continues indefinitely are the same
4 as the impacts for long-term storage, as described in Section 5.3.2. The only difference is that
5 the activities required for maintenance and replacement of the ISFSI and the DTS would be
6 repeated indefinitely. Therefore, NRC concludes that the impacts on minority and low-income
7 populations for indefinite storage would not be disproportionately high and adverse.

8 **5.4 Air Quality**

9 This section describes air quality impacts caused by the continued storage of spent fuel at an
10 away-from-reactor ISFSI. See Section 3.4.3 for additional information regarding air quality
11 standards.

12 **5.4.1 Short-Term Storage**

13 For the purposes of its analysis of air quality impacts in this draft GEIS, the NRC will use the
14 information regarding the emissions from construction and operations activities at the PFSF
15 (e.g., construction vehicles, land disturbance, fuel receipt, and routine maintenance and
16 monitoring), because they would be representative of the activities and air emission levels of a
17 similar away-from-reactor ISFSI, regardless of location. In the PFSF EIS (NRC 2001), the NRC
18 examined air quality impacts related to construction and operation of a consolidated ISFSI with
19 a capacity of 40,000 MTU, as well as the construction of a rail spur to transport spent fuel to and
20 from the ISFSI, located in a National Ambient Air Quality Standards attainment area. Fugitive
21 dust would have the greatest influence on air quality during construction. As stated in the PFSF
22 EIS, the magnitude of the impact depends in part on the proximity to receptors. For the
23 construction analysis for the onsite facilities the PFSF EIS concluded that the impacts were
24 SMALL. Atmospheric concentrations of particulate matter with an aerodynamic diameter of
25 10 microns or less (PM^{-10}) were modeled between 1.13 km (0.7 mi) from the center of the
26 proposed facility (i.e., the distance to the nearest publicly owned land) and 3.5 km (2.2 mi) from
27 the center of the proposed facility (i.e., the distance to the nearest residence). Emissions from
28 vehicles were also considered. A maximum of 10 equipment operators were expected to be
29 onsite at any one time, and emissions from construction-related equipment were expected to be
30 small. However, due to the large extent of the disturbed area, fugitive dust emitted from
31 excavation and earthwork could lead to local increases in particulate matter concentrations. In
32 its analysis for the PFSF, the NRC made conservative assumptions including the following:

- 33 • The entire site area of 30 ha (75 ac) would undergo heavy construction at the same time.
- 34 • Construction was assumed to occur continuously during a 9-hour shift (8 a.m. to 5 p.m. each
35 day).

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- 1 • Background sources of dust from within a 50-km (32-mi) radius of the site were added to the
2 construction-related dust.
- 3 • No mitigation was assumed as a result of natural obstructions (e.g., mountains) that exist
4 between background sources and the PFSF site.

5 Even when the construction was assumed to be as intensive as that assumed for the PFSF, the
6 modeled concentrations of particulate matter from PFSF construction activities were below the
7 regulatory standards associated with the allowable increases in emission levels for individual
8 projects (i.e., Prevention of Significant Deterioration Class II limits under the Clean Air Act).

9 For the rail-spur construction analysis, the PFSF EIS concluded that the temporary and
10 localized effects of fugitive dust could produce MODERATE impacts in the immediate vicinity
11 where the rail spur and Interstate 80 were near each other and SMALL impacts elsewhere.
12 Atmospheric concentrations of PM⁻¹⁰ were modeled for a total area of 5 ha (12.4 ac) where the
13 rail line ran approximately parallel to Interstate 80 and the rail spur was as close as 50 m
14 (164 ft) to the highway. Dust levels were noticeable, and dust control mitigation measures
15 (e.g., surface wetting) were included to ensure compliance with National Ambient Air Quality
16 Standards.

17 For an away-from-reactor ISFSI, the NRC assumes that, if necessary, any site-specific permits
18 would include appropriate mitigation to ensure that impacts would not be destabilizing to local
19 air quality. An applicant would also have to comply with the requirements of the General
20 Conformity Rule (Section 176 of the Clean Air Act) if the area in which the ISFSI is to be built
21 has not met the National Ambient Air Quality Standards. Thus, the Clean Air Act permitting
22 process provides a regulatory mechanism to ensure that particulate concentrations created by
23 ISFSI construction would be held below regulatory standards and mitigated as appropriate to
24 protect ambient air quality.

25 The construction of an away-from-reactor ISFSI of the size assumed by the NRC in the
26 introduction to this chapter of the draft GEIS would generate emissions similar to those
27 evaluated in the PFSF EIS, because similar activities would have to be carried out at the
28 generic facility. Based on the emission levels associated with continued storage, construction
29 impacts would depend on the proximity of the receptor to the emission-generating activities.
30 The NRC expects that noticeable impacts resulting from the proximity between emission
31 sources and receptors would more likely be associated with rail-spur construction rather than
32 ISFSI facility construction, because of the distance between the ISFSI construction activities
33 and the site boundary. Therefore, the NRC concludes that for an area that is in attainment for
34 the National Ambient Air Quality Standards, the construction impacts could range from not
35 noticeable to noticeable but not destabilizing.

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1 The NRC also considered how construction-related emissions might affect areas designated by
2 the U.S. Environmental Protection Agency (EPA) as “maintenance” or “nonattainment” for
3 criteria pollutants.⁴ Estimated annual emissions of criteria pollutants at the PFSF were much
4 lower than *de minimis* levels described in 40 CFR 93.153, “Applicability.” For example, the
5 applicant for the PFSF estimated that emissions of nitrogen oxides, a precursor to ozone, would
6 have been less than 10 T/yr (PFS 2001). The *de minimis* level of emissions in even an extreme
7 nonattainment area for ozone is 10 T/yr.

8 Based on the emission levels discussed above, the NRC concludes that the air quality impacts
9 related to construction of a consolidated ISFSI could range from not noticeable to noticeable but
10 not destabilizing in any air quality region. Noticeable but not destabilizing impacts, if they occur,
11 would be due to fugitive dust emissions in the areas immediately adjacent to the rail-spur
12 construction activities.

13 As stated in the PFSF EIS (NRC 2001), during operations the PFSF would not have been a
14 “major stationary source” of air emissions as defined in 40 CFR 52.21(b). The PFSF analyses
15 considered emissions from sources such as space heaters, emergency generators, and a
16 concrete batch plant, as well as vehicle emissions, and stated that if the emissions from these
17 sources were combined, the total would not be expected to exceed the significance levels for
18 Prevention of Significant Deterioration analysis specified in 40 CFR 51.166(b)(23)(i). The PFSF
19 EIS concluded that the operations impacts on air quality would be SMALL. The NRC
20 determined that the results of this PFSF EIS would be applicable to any away-from-reactor
21 ISFSI with a similar 40,000-MTU capacity because the types of emission-generating activities
22 and associated emission levels would be similar. Therefore, the NRC concludes that the air
23 quality impacts from the operation of the ISFSI would be minor.

24 Transportation of spent fuel from reactor sites to the away-from-reactor ISFSI could also
25 contribute to air quality impacts. In the PFSF EIS, the NRC stated that the locomotives using
26 the rail line would have emitted pollutants in any one area for a very short period before moving
27 on. The NRC concluded that the associated air quality impacts would be small (NRC 2001).
28 For the analysis of an away-from-reactor ISFSI in this draft GEIS, the NRC concludes that the
29 basis for the PFSF conclusion would be applicable to any ISFSI because the same amount of
30 fuel would have to be transported over similar distances. Therefore, the air quality impacts
31 associated with the transportation of spent fuel to the site would be minor.

⁴ The EPA designates an area as “nonattainment” generally based upon air quality monitoring data or modeling studies that show the area violates, or contributes to violations of, the national standard. After a nonattainment area’s air quality improves so that it is no longer violating or contributing to violations of the standard, and the State or Tribe adopts an EPA-approved plan to maintain the standard, the EPA can redesignate the area as attainment. These areas are known as “maintenance” areas. See also Section 3.4.3.

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1 Overall, the NRC concludes that the air quality impacts from the construction and short-term
2 operation of an away-from-reactor ISFSI would be SMALL to MODERATE. MODERATE
3 impacts, if they occur, would be due to fugitive dust emissions in the areas immediately adjacent
4 to the rail-spur construction activities.

5 **5.4.2 Long-Term Storage**

6 Activities associated with aging management of spent nuclear fuel in dry casks (e.g., cask
7 repair, bare fuel handling as part of repackaging operations, and replacement of the ISFSI and
8 the DTS) are expected to be of relatively short duration and limited extent. These activities are
9 likely to involve only a portion of the ISFSI, and would likely involve, in any year, only a fraction
10 of the air emissions that were associated with initial construction of the ISFSI. Maintenance of
11 the rail spur would also occur during long-term storage. As a result, there may be temporary
12 increases in levels of fugitive dust from construction and refurbishment activities. But the
13 impacts on air quality would be less than those of initial construction because the work would be
14 performed in stages over an extended period of time, as needed.

15 The NRC assumes that a DTS would have to be constructed during the long-term storage
16 timeframe. However, as discussed in Section 5.1, the DTS is a relatively small facility and the
17 air quality impacts associated with its construction would be a fraction of the impacts associated
18 with the original construction of the ISFSI. In addition, exhaust from vehicles for commuting
19 workers and material transportation would add to levels of hydrocarbons, carbon monoxide, and
20 nitrogen oxides. However, these emissions would be less than those during the construction
21 period and are not expected to noticeably affect air quality in the region.

22 Overall, the NRC concludes that the impacts on air quality would be SMALL for all location
23 classifications (i.e., attainment, nonattainment, and maintenance).

24 **5.4.3 Indefinite Storage**

25 This section evaluates the air quality impacts of away-from-reactor storage, assuming a
26 repository does not become available. The same activities described in Section 5.4.2 would
27 occur repeatedly because the spent fuel would remain at the facility indefinitely. Therefore, the
28 NRC concludes that the impacts on air quality associated with continuing spent fuel storage for
29 an indefinite period would be SMALL for all location classifications (i.e., attainment,
30 nonattainment, and maintenance).

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1 **5.5 Climate Change**

2 In this section, the NRC evaluates the effect of continued storage at an away-from-reactor ISFSI
3 on climate change. The NRC's evaluation of the effects of climate change on the intensity and
4 frequency of natural phenomena hazards that may cause spent fuel storage accidents is
5 provided in Sections 4.18.

6 **5.5.1 Short-Term Storage**

7 The issue of climate change was not specifically addressed in the PFSF EIS. Therefore, for the
8 purposes of this draft GEIS, the NRC assumes that the greenhouse gas emission levels
9 released from the construction and operation of a 1,000-MW(e) reference reactor would bound
10 those associated with a 40,000-MTU ISFSI (NRC 2011e). Construction and operation of light
11 water reactors involves, among other things, substantial earthwork and soil dewatering,
12 concrete batch plant operations, making and emplacing many thousands of metric tons of
13 concrete, ironworks, lifting and rigging construction materials and equipment, material
14 transportation, equipment maintenance, demolition, and workforce transportation. Because
15 these activities are of a far greater scale than that for an away-from-reactor ISFSI, the
16 greenhouse gas emission levels from the construction and operation of a 1,000-MW(e)
17 reference reactor bound the emissions from the construction and operation of an away-from-
18 reactor ISFSI.

19 In its Carbon Dioxide Footprint Estimates for new reactors (NRC 2011e), the NRC categorized
20 emission levels by project phases. The NRC assumed a 7-year construction period, which
21 would generate a total of 185,000 MT of carbon dioxide (CO₂) or about 26,500 MT/yr. The
22 analysis assumed an average workforce of 2,500 workers, or roughly 10 times the number of
23 workers expected to build the ISFSI. Although the new reactor analysis did not include
24 transport of supplies and waste materials, which would also generate greenhouse gases during
25 construction, the number of vehicles transporting workers to a new reactor construction site
26 vastly exceeds the number of vehicles transporting supplies and materials. Therefore, the
27 10:1 ratio between workers at a new reactor construction site compared to an ISFSI
28 construction site still provides a very conservative, bounding calculation of 26,500 MT/yr in
29 greenhouse gas emissions, even including the emissions from the transport of supplies and
30 waste materials for the ISFSI. For the PFSF, Phase 1 of the construction, which encompassed
31 the bulk of construction, was scheduled for 18 months. Using a conservative estimate of
32 2 years, construction of the ISFSI would lead to greenhouse gas emissions of about 53,000 MT.

33 For a reactor during the operations period, the NRC estimated a workforce of 400 and total
34 CO₂ emissions (including emissions from support equipment) of 320,000 MT over 40 years.
35 This equates to 8,000 MT/yr (NRC 2011e). Similar to the construction estimate, the new reactor
36 analysis did not include transport of supplies and waste materials that would also generate

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1 greenhouse gases during operations. However, the workforce assumed for the reactor is about
2 10 times the workforce that would be needed for the ISFSI and there is more support equipment
3 (e.g., emergency diesel generators) at the reactor as well. Therefore, for the purposes of
4 estimating the impacts for the ISFSI, the 8,000 MT/yr produced by an operating reference
5 reactor is a conservatively high number.

6 Transportation of spent fuel from the reactor sites to the away-from-reactor ISFSI would also
7 involve emissions of CO₂.⁵ A similar issue was considered in the U.S. Department of Energy
8 (DOE) EIS for Yucca Mountain (DOE 2002) and DOE's 2008 Final Supplemental EIS for
9 Yucca Mountain (DOE 2008a). These EISs considered the transportation of 70,000 MTU of
10 spent fuel from reactor sites over a 50-year operational period, as opposed to the 40,000 MTU
11 assumed by the NRC for the away-from-reactor ISFSI over a 20-year operational period. In its
12 2008 Final Supplemental EIS, DOE determined that the movement of the fuel would add less
13 than 0.0006 percent to overall national CO₂ emissions in 2005. The NRC reviewed the analysis
14 performed by DOE and determined that it was generally consistent with NRC and Council on
15 Environmental Quality regulations and NRC guidance for completeness and adequacy
16 (NRC 2008). Because the annual amount of spent fuel going to an away-from-reactor ISFSI
17 (2,000 MTU/yr based on shipping 40,000 MTU in 20 years) is a factor of 1.4 greater than the
18 annual amount considered in the Yucca Mountain EIS (1,400 MTU/yr based on shipping
19 70,000 MTU in 50 years) and emissions are proportionate to the amount of fuel shipped, the
20 emissions from the transportation of spent fuel from reactors to the away-from-reactor ISFSI
21 would be less than double the low proportion (less than 0.0006 percent) of national
22 CO₂ emissions calculated in the Yucca Mountain Final Supplemental EIS. Because this
23 transportation adds only slightly to existing traffic, and because emissions would be dispersed
24 over a wide area between the reactor sites and the ISFSI, the NRC concludes that the
25 greenhouse gas emissions impacts from the transportation of that spent fuel would be minor.

26 The total emissions associated with constructing (2 years at 26,500 MT/yr) and operating the
27 facility over the short-term timeframe of 60 years (60 years at 8,000 MT/yr) would be
28 533,000 MT; the average emissions rate would be about 8,600 MT/yr. The annual emission
29 values for the various phases represent a small percentage of the 6,821,800,000 MT generated
30 annually in the United States (EPA 2012). To put the annual emissions in context, 8,600 MT is
31 equivalent to the annual emissions from 1,720 passenger vehicles (NRC 2011a, Table 7-2).
32 During the construction period, when emissions are higher than the average, the 26,500 MT
33 would be equivalent to the annual emissions from 5,300 passenger vehicles.

34 The NRC concludes that the relative contribution of an away-from-reactor ISFSI to greenhouse
35 gas emission levels would be SMALL.

⁵ As indicated in the introduction to this chapter, the potential impacts from transportation of spent fuel from an away-from-reactor ISFSI to a repository are not evaluated in this section.

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1 **5.5.2 Long-Term Storage**

2 Activities associated with aging management of spent nuclear fuel in dry casks (e.g., cask
3 repair, construction of the DTS, bare fuel handling as part of repackaging operations, and ISFSI
4 and DTS replacement) are expected to be of relatively short duration and limited extent. These
5 activities are likely to involve only a portion of the ISFSI, and would likely involve, in any year,
6 only a fraction of the greenhouse gas emissions associated with initial construction of the
7 storage facilities (see Sections 5.1.2 and 5.4.2). Therefore, the NRC concludes that the relative
8 contribution of spent nuclear fuel transfer, handling, and aging management activities beyond
9 the licensed life for operation of a reactor to greenhouse gas emission levels would be SMALL,
10 for the same reasons stated in Section 5.5.1.

11 **5.5.3 Indefinite Storage**

12 This section describes the environmental impacts on climate change if spent fuel must be stored
13 indefinitely. Ongoing transfer, handling, and aging management activities would continue
14 indefinitely, the ISFSI and DTS would be replaced, and the spent fuel would be repackaged
15 every 100 years. The main difference when compared to the impacts described in
16 Sections 5.5.1 and 5.5.2 is that without a repository these activities would occur on an ongoing
17 basis over a longer period of time. However, the annual emission levels for the various phases
18 would remain the same.

19 The NRC concludes that the relative contribution of an away-from-reactor ISFSI to annual
20 greenhouse gas emission levels would be SMALL, the same as the emissions discussed in
21 Section 5.5.2.

22 **5.6 Geology and Soils**

23 This section describes geology and soils impacts caused by the continued storage of spent fuel
24 at an away-from-reactor ISFSI.

25 **5.6.1 Short-Term Storage**

26 Construction impacts associated with away-from-reactor storage include earth clearing and
27 foundation laying for the ISFSI, both of which may contribute to soil erosion. As discussed in
28 the introduction to this chapter, these activities would be similar to those described in the PFSF
29 EIS, regardless of the location of the ISFSI. As described in the PFSF EIS, the environmental
30 impacts on soils would have included the loss of soils as a result of physical alterations to the
31 existing soil profile. These alterations would have led to a reduced availability to support plant
32 and animal life and could have led to changes in erosion patterns and characteristics that affect
33 how water infiltrates into the soil (NRC 2001). However, in the PFSF EIS, the NRC concluded
34 that these losses are a small percentage of the similar available soils in the valley. The NRC

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1 also noted that soils used in project construction are recoverable upon facility decommissioning,
2 and that no excess soils would be generated that require shipment or disposal offsite. Similarly,
3 economic geologic resources (such as minerals, oil, and gas, if any) that would be unavailable
4 for exploitation during facility construction and operation are widely available elsewhere in the
5 region.

6 As discussed in Section 5.1, the amount of land committed to the away-from-reactor ISFSI is
7 relatively small compared, for example, to the land available in a typical county. The methods
8 necessary to control soil erosion are well understood and local permits typically require the
9 implementation of erosion controls. Because of the relatively small size of the facility,
10 restrictions on access to geologic resources under the ISFSI site would also be minimal. For
11 these reasons, the NRC concludes that the impacts on soils and geologic resources from the
12 building and short-term operation of an away-from-reactor ISFSI would be SMALL.

13 **5.6.2 Long-Term Storage**

14 The NRC expects that the construction of a DTS (see Chapter 2 for further details) will have
15 minimal impacts on geology and soils due to the small size of the facility (about 0.7 ha [2 ac] for
16 the DTS security zone). The types of impacts on soils would be similar to those anticipated for
17 any power plant facility construction. Due to the relatively small size of the DTS, the impacts
18 would be limited to the immediate area. Also, any laydown areas associated with construction
19 would be reclaimed once the construction phase was complete.

20 It is assumed that ISFSI pads and supporting facilities (e.g., canister transfer building) would
21 require replacement during the long-term storage timeframe and would occur on land
22 immediately adjacent to existing facilities. It is not anticipated that the overall land disturbed
23 would increase because the old facility location would be demolished and the land would likely
24 be reclaimed. Even if the land is not reclaimed, it has no further impact on soils and geologic
25 resources because all of the activities would occur inside the 40-ha (99-ac) restricted area. The
26 operations phase of any ISFSI is not anticipated to have any additional impacts on soils above
27 those associated with construction.

28 In general, while the geological characteristics of the site and vicinity are essential to the safe
29 design and operation of the ISFSI, ~~and~~ continued storage of spent fuel does not have a
30 significant environmental impact on geological resources (such as, damage to unstable slopes,
31 adjacent utilities, or nearby structures).

32 The construction, operation, and replacement of a DTS would have minimal impacts on soils on
33 the small fraction of the land committed for the facility. There are no anticipated impacts on the
34 geology of an area as the result of either the construction or operation of a DTS. Therefore, the
35 NRC concludes that the environmental impact on geology and soils due to transfer, handling,
36 and aging management of fuel during the long-term storage timeframe would be SMALL.

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1 **5.6.3 Indefinite Storage**

2 In this section, the impacts on geology and soils are evaluated for away-from-reactor storage
3 assuming a repository does not become available. The same operations and maintenance
4 activities described in Section 5.6.2 would occur repeatedly because the spent fuel would
5 remain at the facility indefinitely.

6 An away-from-reactor storage facility would have no additional impact if a repository is not
7 available; therefore, the NRC concludes that the impacts on geology and soils from indefinite
8 storage would be SMALL.

9 **5.7 Surface-Water Quality and Use**

10 This section describes surface-water quality and use impacts caused by the continued storage
11 of spent fuel at an away-from-reactor ISFSI.

12 **5.7.1 Short-Term Storage**

13 Construction of an away-from-reactor ISFSI would require modification of the surface drainage
14 to accommodate increased locally generated stormwater resulting from land cleared of
15 vegetation and the increased area of impervious cover resulting from paved roads, buildings,
16 and thick concrete pads on which spent fuel casks would be placed (NRC 2001). The types of
17 activities carried out at the ISFSI that could affect surface water would be similar to those
18 activities described for the PFSF based on the assumptions presented in the introduction to this
19 chapter.

20 For the PFSF site, the NRC noted that BMPs would have been used to address stormwater
21 flows, soil erosion, and siltation throughout the construction period. The NRC determined that,
22 during construction, implementation of BMPs would have resulted in impacts on surface-water
23 quality that would have been SMALL. The NRC also determined that, in the unlikely event that
24 severe flooding occurred during the construction period (when the ground-disturbing activities
25 would have made the soil more mobile), impacts on the surface-water hydrological system
26 would have been SMALL to MODERATE.

27 The methods necessary to control impacts on surface-water quality during the construction of
28 the ISFSI are well understood and local permits typically require the implementation of these
29 controls. Stormwater control measures, which would be required to comply with National
30 Pollutant Discharge Elimination System (NPDES) permitting, would minimize the flow of
31 disturbed soils or other contaminants into surface waterbodies. The licensee could also
32 implement BMPs to minimize erosion and sedimentation. The NRC concludes that under
33 normal circumstances, the impacts on surface-water quality would be minor. Depending on the
34 characteristics of the specific location, unforeseen storm events could cause periods during

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1 which surface water could be noticeably affected by runoff, erosion, and sediment loads.
2 However, these events would be of short duration, after which water quality would return to
3 normal.

4 During construction, the PFSF would have used from about 102 m³/d (19 gpm) to more than
5 520 m³/d (96 gpm) of water (NRC 2001). The water requirements for an away-from-reactor
6 ISFSI would be similar because of its similar size. These water requirements could be met by a
7 combination of groundwater, surface water, or water delivered to the site (by truck or from a
8 local municipal water system). The amount of water required is relatively small. For example, a
9 large power plant with cooling towers might consume approximately 54,500 m³/d (10,000 gpm).
10 During the operational period, the away-from-reactor ISFSI would be in a passive state and
11 water use would be much lower than during the construction period. The PFSF would have
12 used about 6.8 m³/d during operations (1.3 gpm). Activities would be limited to cask
13 emplacement and site maintenance with very little water use. Transportation of the spent fuel to
14 the ISFSI would not have any impacts on surface-water use or quality. For these reasons, the
15 potential impacts on the surface-water flow system, water availability, and water quality during
16 ISFSI operation are generally expected to be minor.

17 For construction and operation of the away-from-reactor ISFSI, the NRC concludes that the
18 overall impacts on surface-water use and quality would be SMALL. Although there is a
19 possibility of noticeable impacts during unusual storm events during construction, such impacts
20 would be short-lived before the surface waterbody would return to normal conditions.
21 Therefore, even taking into consideration the impact of such unusual storm events, the overall
22 impact would be SMALL.

23 **5.7.2 Long-Term Storage**

24 The construction and operation of a DTS (see Chapter 2 for further details) is anticipated to
25 have minimal impacts on surface-water resources due to the small size of the facility (about
26 0.7 ha [2 ac] for the DTS security zone) compared to the ISFSI restricted area (40 ha [99 ac]).

27 The construction and operation of a DTS involves very little consumptive use of water, and this
28 use would be intermittent. Given the relatively smaller size of the DTS compared to a
29 40,000-MTU away-from-reactor ISFSI, much less water would be required to build the DTS than
30 would be used to construct the ISFSI. Therefore, the consumptive water use for construction
31 and operation of the DTS would be minor.

32 With regard to storage facility replacement activities, the consumptive water use would be no
33 greater than that identified for initial construction of the facilities, which would have only a minor
34 impact on water availability.

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1 The NRC assumes that ISFSI and DTS would require replacement during the long-term storage
2 timeframe and that replacement structures would likely be constructed on land immediately
3 adjacent to existing facilities. It is not anticipated that the overall land disturbed would increase
4 because the old facility location would be demolished and the land would likely be reclaimed.
5 This alternating location pattern minimizes the total land disturbed, which would limit the flow of
6 disturbed soils or other contaminants into surface waterbodies. Based on the preceding
7 analysis, expected impacts on surface-water resources would be similar to those in Section
8 5.7.1, SMALL.

9 **5.7.3 Indefinite Storage**

10 If no repository becomes available, away-from-reactor dry cask storage of spent fuel would
11 continue indefinitely. As a result, the potential impacts on surface-water resources would be
12 similar to those described in Section 5.7.2, because the same operational activities would be
13 happening at the storage site. Every 100 years, surface water would be needed for demolishing
14 and replacing concrete pads and other possibly degraded facilities. This additional consumptive
15 use would be temporary. Therefore, the NRC concludes that the potential impacts on surface-
16 water use and quality if a repository is not available would be SMALL.

17 **5.8 Groundwater Quality and Use**

18 This section describes groundwater-quality and -use impacts caused by the continued storage
19 of spent fuel at an away-from-reactor ISFSI.

20 **5.8.1 Short-Term Storage**

21 Construction of an away-from-reactor ISFSI would require only shallow excavations for the
22 concrete pad foundation and all structures for ISFSI facilities would be at or near the ground
23 surface.

24 The water-use requirements for the away-from-reactor ISFSI would be similar to those for the
25 PFSF because of its similar size. This water could be obtained from groundwater sources. For
26 the PFSF site, the NRC noted that water use during construction would have varied from about
27 102 m³/d (19 gpm) to more than 520 m³/d (96 gpm) (NRC 2001). For an away-from-reactor
28 ISFSI, these water requirements could be met by a combination of groundwater, surface water,
29 or water delivered to the site (by truck or from a local municipal water system). The amount of
30 water required is relatively small. For example, a large power plant with cooling towers might
31 consume approximately 54,500 m³/d (10,000 gpm). In the PFSF EIS (NRC 2001), the NRC
32 determined that environmental impacts from consumptive use of groundwater during
33 construction of the proposed facility would have been SMALL. Because of the relatively small
34

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1 amount of consumptive water use and the ability to obtain water from multiple sources, the NRC
2 concludes that the impacts of consumptive use of groundwater for an away-from-reactor ISFSI
3 would be minor.

4 Potential impacts on groundwater quality would be expected to originate through seepage from
5 ground-surface features, such as contaminants in runoff from the concrete pad surfaces and
6 overlying surface waterbodies. The potential impacts on groundwater quality from an away-
7 from-reactor ISFSI would depend on local conditions. The methods to control impacts on
8 groundwater quality are well understood and local permits typically require the implementation
9 of these controls. Under these permits, licensees would be required to implement BMPs to
10 mitigate any potential impacts on groundwater from fuels and other ground-surface
11 contaminants. For this reason, the NRC concludes that the impacts on groundwater quality
12 would be minor. By way of comparison, the impacts on groundwater quality from the PFSF
13 construction were determined by the NRC to be SMALL, given the depth to groundwater (about
14 38 m [125 ft]) and mitigation afforded by the PFS BMP plan. Groundwater-quality impacts
15 during PFSF operation were also deemed to be SMALL. This finding included consideration of
16 operation of a surface-water detention basin, two planned septic systems with leach fields, and
17 storage of onsite vehicle fuel.

18 Transportation of the spent fuel to the ISFSI would not have any impacts on groundwater use or
19 quality.

20 Based on the considerations discussed above, the NRC concludes that the impacts on
21 groundwater use and quality from construction and short-term operation of the away-from-
22 reactor ISFSI would be SMALL.

23 **5.8.2 Long-Term Storage**

24 To accomplish spent fuel repackaging into new canisters, the NRC assumes that a DTS would
25 be required, as described in Chapter 2. The environmental impacts on groundwater of
26 constructing a DTS at an away-from-reactor facility would be smaller than those considered for
27 construction of the away-from-reactor ISFSI (Section 5.8.1) because of the small area of land
28 affected. Likewise, the impacts of replacing the ISFSI and the DTS over time would be no more
29 than the impacts of the initial construction of the facility, because ~~it~~ **they** involves similar
30 activities and would likely occur over a longer period of time. As a result, the NRC concludes
31 that the impacts on groundwater use and quality of long-term storage of spent fuel would be
32 SMALL.

33 **5.8.3 Indefinite Storage**

34 If a repository does not become available, then activities described in Section 5.8.2 would
35 continue indefinitely, including replacement of ISFSI and DTS every 100 years. The potential

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1 environmental impacts on groundwater would be similar to those discussed in Section 5.8.2.
2 Therefore, the NRC concludes that the potential environmental impacts on groundwater use and
3 quality due to indefinite storage of spent fuel at an away-from-reactor ISFSI would be SMALL.

4 **5.9 Terrestrial Resources**

5 This section describes terrestrial resource impacts caused by the continued storage of spent
6 fuel at an away-from-reactor ISFSI.

7 **5.9.1 Short-Term Storage**

8 Construction activities of an away-from-reactor dry cask storage facility that would affect
9 terrestrial ecology involve land clearing, grading, and building facilities, including access roads
10 and a rail spur. During construction of an away-from-reactor dry cask storage facility, vegetation
11 would be most affected by the direct removal of trees, plants, shrubs, and grasses and by
12 replacing some of the cleared land with structures and ancillary facilities, including access
13 roads. These removal activities could result, to varying degrees, in reduction of available
14 wildlife habitat and food; modification of existing vegetative communities; and potential
15 establishment or spread of invasive plant species. Parts of the disturbed areas would be
16 replanted with some mixture of native and non-native plant species. Terrestrial wildlife would be
17 most affected by habitat loss or alteration, displacement of wildlife, and incremental habitat
18 fragmentation, all of which can lead to direct and indirect mortalities. However, in general, most
19 wildlife would disperse from the project area when construction activities begin nearby, and may
20 recolonize in adjacent, undisturbed areas. In addition, wildlife could be disturbed by noise from
21 construction equipment and vehicle traffic. Collisions with vehicles could be responsible for
22 direct mortality of both large and small animals.

23 The NRC evaluated site-specific construction impacts on terrestrial ecological resources from
24 an away-from-reactor dry storage facility as part of the PFSF EIS (NRC 2001). Based on the
25 assumptions presented in the introduction to this chapter, land-disturbing activities for an away-
26 from-reactor ISFSI would be of a similar magnitude. For the PFSF, the NRC evaluated the
27 clearing of 94 ha (232 ac) for the main facility and access road, of which 37 ha (92 ac) were to
28 be revegetated after construction, and 57 ha (140 ac) were to remain cleared for the life of the
29 project. The PFSF also required the addition of a 51-km (32-mi) rail line that involved the
30 clearing of 314 ha (776 ac), of which 251 ha (621 ac) were to be revegetated after construction,
31 and 63 ha (155 ac) were to remain cleared for the life of the project (NRC 2001). The proposed
32 PFSF, located in an arid, shrub-saltbush vegetation community, was expected to store as many
33 as 4,000 canisters in individual storage casks to store a maximum of 40,000 MTU of spent fuel.
34 The PFSF had drainages in the area that were ephemeral. However, no wetlands were on or
35 near the proposed PFSF, and there would have been no direct impacts on wetlands from
36 construction (NRC 2001). It is likely that an away-from-reactor storage facility would also be

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1 located in an area away from sensitive perennial and wetland habitats to satisfy laws such as
2 the Endangered Species Act (ESA) and the Clean Water Act (for wetlands). However, in some
3 locations sensitive terrestrial features may be unavoidably affected.

4 The NRC concluded that the direct impact on vegetation from clearing vegetation and disrupting
5 the ground surface from the proposed PFSF would have been SMALL because no unique
6 habitats occur in the proposed project area (NRC 2001). The NRC further concluded that
7 vegetation removal impacts that reduce habitat, alter prey-predator relationships, and force
8 animals to leave the area would have been SMALL. The NRC also concluded that indirect
9 impacts from the proposed PFSF, including surface-water runoff from impermeable surfaces,
10 restricting large animal movement, construction noise, introduction on non-native plant species,
11 groundwater withdrawal effects on vegetation, and ground and vegetation disturbances from
12 trucks and associated fugitive dust, would also have been SMALL (NRC 2001).

13 For an away-from-reactor ISFSI at a different location, the impacts on terrestrial resources could
14 be different from those at the PFSF. However, certain factors tend to limit the impacts, including
15 the following:

- 16 • The land area permanently disturbed is relatively small.
- 17 • Any impacts on wetlands must be addressed under the Clean Water Act and, if wetlands are
18 present, the applicant must demonstrate that the proposed action is the least
19 environmentally damaging practicable alternative.

20 Even considering these factors, it is possible that the construction of the project could have
21 some noticeable, but not destabilizing, impacts on terrestrial resources, depending on what
22 resources are affected, as demonstrated by other environmental reviews the NRC has
23 performed (e.g., reviews for new reactors). Given the passive nature of ISFSI operations,
24 impacts on terrestrial resources from such operations (e.g., reduced available habitat, reduced
25 mobility of terrestrial animals, and increased noise, light, and traffic) would be much less than
26 the impacts of construction and would be minimal. Transportation of the spent fuel to the ISFSI
27 would have little or no impacts on terrestrial resources. Therefore, the NRC concludes that,
28 depending on the characteristics of the particular site, the impacts on terrestrial resources could
29 range from SMALL to MODERATE, based primarily on the potential impacts of construction
30 activities.

31 **5.9.2 Long-Term Storage**

32 As described previously in Section 5.1.2, the NRC assumes that a DTS would be constructed as
33 part of an away-from-reactor ISFSI. This facility would be used to facilitate repackaging of spent
34 fuel or replacement of damaged canisters or packages identified during visual inspections or
35 aging management activities. Construction of a DTS is anticipated to last about 2 years (see

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1 Section 5.1.2), and only a small portion of the land committed for an away-from-reactor ISFSI is
2 required to construct and operate a DTS.

3 The NRC assumes that because only a small portion of the land committed for an away-from-
4 reactor ISFSI is required to construct and operate a DTS, the impacts from construction and
5 operation of a DTS on terrestrial resources would be significantly less than those from
6 construction and operation of an away-from-reactor ISFSI. The DTS could be sited on
7 previously disturbed ground, probably away from sensitive terrestrial features, due to the
8 relatively small land area affected for a DTS security zone (about 2 ac).

9 Operational impacts would include reduced available habitat and mobility of terrestrial animals
10 and increased noise, light, and traffic. Maintenance activities would include inspections and
11 testing of the spent fuel and cask transfer and handling equipment and process and effluent
12 radiation monitoring, which do not increase erosion, fugitive dust, traffic, noise, light, or release
13 of contaminants, or require any change to land use. As the ISFSI and the DTS are replaced
14 during the long-term storage timeframe, it is anticipated that there would be no new or additional
15 activities from those described above. The potential impacts would be less than the impacts the
16 NRC evaluated in Section 5.9.1, because replacement activities would occur within the plant's
17 operational area adjacent to existing facilities. For these reasons, the NRC concludes that the
18 impact on terrestrial resources due to transfer, handling, and aging management of spent fuel at
19 an away-from-reactor ISFSI during the long-term storage timeframe would be SMALL.

20 **5.9.3 Indefinite Storage**

21 Impacts on terrestrial resources from continued operation of an away-from-reactor ISFSI if a
22 repository is not available would be similar to those described in Section 5.9.2. The same
23 operations and maintenance activities described in Section 5.9.2 would occur repeatedly
24 because the spent fuel would remain at the facility indefinitely.

25 Based on the NRC's evaluation of the impacts from operations of an away-from-reactor ISFSI in
26 Section 5.9.2, the NRC concludes that the environmental impacts on terrestrial resources from
27 dry cask storage of spent fuel at an away-from-reactor ISFSI indefinitely would be SMALL.

28 **5.10 Aquatic Ecology**

29 This section describes aquatic ecology impacts caused by the continued storage of spent fuel at
30 an away-from-reactor ISFSI.

31 **5.10.1 Short-Term Storage**

32 Construction and operation of an away-from-reactor ISFSI would require limited water supplies
33 (see Sections 5.7 and 5.8). Liquid effluents, if any, would be limited to stormwater and treated

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1 wastewater. The dry cask storage facility could likely be sited away from sensitive aquatic
2 features to comply with the ESA and other environmental laws. Ground-disturbing activities
3 could increase runoff and surface erosion into aquatic habitats. In most cases, aquatic
4 disturbances would result in relatively short-term impacts and the aquatic environs would
5 recover naturally. In addition, stormwater control measures, which would be required to comply
6 with NPDES permitting, would minimize the flow of disturbed soils or other contaminants into
7 aquatic features. The plant operator could also implement BMPs to minimize erosion and
8 sedimentation.

9 For the PFSF, given the minimal impacts on aquatic biota and minimal aquatic features near the
10 site, the NRC concluded that construction and operational activities at the PFSF would have
11 had negligible direct and indirect impacts on aquatic biota (NRC 2001). This conclusion
12 resulted from the facility's limited water use and the passive nature of facility operations. For an
13 away-from-reactor ISFSI at a different location, the impacts on aquatic resources could be
14 different from those at the PFSF. However, certain factors would tend to limit the impacts,
15 including the following:

- 16 • The land area permanently disturbed is relatively small.
- 17 • Water use for the construction and operation of the site is limited.
- 18 • Any impacts from discharges to waterbodies must be addressed under the Clean Water Act
19 and an associated NPDES permit must be obtained for such discharges, including
20 stormwater runoff.

21 Considering all of these factors, the NRC concludes that the impacts on aquatic resources
22 would be SMALL.

23 **5.10.2 Long-Term Storage**

24 Building a DTS and activities related to the transfer and handling of spent fuel and aging
25 management at away-from-reactor ISFSIs could result in ground-disturbing activities that would
26 have similar impacts to those analyzed in Section 5.10.1. For example, ground-disturbing
27 activities could increase runoff and surface erosion into aquatic habitats. The ISFSI and the
28 DTS would be replaced during the long-term storage timeframe. The NRC anticipates that
29 aquatic impacts from these activities would be within the bounds of those described in
30 Section 5.10.1. The potential impacts may be less than the impacts the NRC evaluated in
31 Section 5.10.1, because replacement activities would occur within the facility's operational area
32 adjacent to existing facilities over an extended period of time. In most cases, aquatic
33 disturbances, if any, would result in relatively short-term impacts and the aquatic environs would
34 recover naturally. Required mitigation related to NPDES or other permits would also reduce
35 impacts. Therefore, the NRC concludes that impacts on aquatic resources from long-term
36 storage at away-from-reactor ISFSIs would be SMALL.

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1 **5.10.3 Indefinite Storage**

2 Impacts on aquatic resources from maintenance and operation of an away-from-reactor ISFSI if
3 no repository becomes available would be similar to those described in Section 5.10.2. The
4 same operations and maintenance activities described in Section 5.10.2 would occur repeatedly
5 because the spent fuel would remain at the facility indefinitely. As described in Section 5.10.2,
6 these activities could result in minimal, short-term impacts on aquatic resources. Therefore, the
7 NRC concludes that impacts on aquatic resources for indefinite storage of spent fuel at an
8 away-from-reactor ISFSI would be SMALL.

9 **5.11 Special Status Species and Habitats**

10 This section describes special status species and habitat impacts caused by the continued
11 storage of spent fuel at an away-from-reactor ISFSI.

12 **5.11.1 Short-Term Storage**

13 Impacts from the construction and operation of dry cask storage facilities on special status
14 species and habitats would be similar to those described above for terrestrial and aquatic
15 resources, which would range from minimal to noticeable; any noticeable impacts would result
16 from the construction of the ISFSI. The NRC assumes that the dry cask storage facility could be
17 sited to avoid adversely affecting special status species and habitat, because of the facility's
18 relatively small construction footprint and limited use of water. However, if an away-from-
19 reactor ISFSI was located in area that could affect Federally listed species or critical habitat,
20 consultation under Section 7 of the ESA would ensure that any adverse impacts are mitigated or
21 avoided.

22 Prior to initial licensing of the facility, the NRC would coordinate with the U.S. Fish and Wildlife
23 Service (FWS), the National Marine Fisheries Service (NMFS), or both, to determine the
24 presence of any Federally listed species or critical habitat at or near the site. If Federally listed
25 species or critical habitat occur near the site and could be affected by the facility, the NRC
26 would be required to initiate ESA Section 7 consultation. As part of the ESA Section 7
27 consultation process, NRC would evaluate the potential impacts from construction and
28 operation of the facility in a Biological Assessment. If necessary, the FWS, NMFS, or both
29 would provide evaluations of the impacts in a Biological Opinion. The Biological Opinion could
30 require monitoring programs or mitigation measures to minimize impacts on listed species and
31 their habitats. If the evaluation indicates that facility activities would result in a "take," or
32 "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in
33 any such conduct" of a listed species, the biological opinion could include an incidental take
34 statement. The incidental take statement would specify the allowable number of "takes" that
35 could occur during a specified period. If the number of takes exceeds the incidental take
36 statement, the NRC would be required to reinitiate consultation with the FWS or NMFS.

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1 Thus, the ESA consultation process would identify potential impacts on listed species and
2 potentially require monitoring and mitigation to minimize impacts on listed species, thus
3 ensuring that any takes during ISFSI operations do not exceed incidental take statement
4 allowances. In addition, the official lists of special status species and habitats are regularly
5 updated by the FWS and NMFS. Species may be added to the list or delisted. If new species
6 were listed under the ESA, the NRC would evaluate any potential impacts on those species at
7 the away-from-reactor ISFSI at the time of listing. Therefore, if a new species were listed after
8 the ISFSI receives its license, the NRC would initiate ESA Section 7 consultation with the FWS
9 and NMFS if the newly listed species may be affected by the ISFSI. Additional details and
10 guidance regarding the consultation process are provided at 50 CFR Part 402 and in the
11 “Endangered Species Consultation Handbook” (FWS/NMFS 1998).

12 In addition, coordination with other Federal and State natural resource agencies would further
13 ensure that licensees take appropriate steps to avoid or mitigate impacts on special status
14 species, habitats of conservation concern, and other protected species and habitats, such as
15 those protected under the Marine Mammal Protection Act, the Migratory Bird Treaty Act, and the
16 Bald and Golden Eagle Protection Act. These consultations would likely result in avoidance or
17 mitigation measures that would minimize impacts on protected species and habitats.

18 For construction of the ISFSI, the impacts on listed species would be determined as part of ESA
19 Section 7 consultation. In complying with the ESA, the NRC would evaluate the impacts of
20 ISFSI construction, operations, and decommissioning in a site-specific review before the ISFSI
21 is initially constructed, if the operating parameters change, or if a “take” occurs for a species not
22 included in an incidental take permit, as described above. The ESA provides four categories by
23 which the NRC would characterize the effects of ISFSI construction: (1) no effect, (2) not likely
24 to adversely affect, (3) likely to adversely affect, or (4) is likely to jeopardize the listed species or
25 adversely modify the designated critical habitat of Federally listed species populations or their
26 critical habitat.

27 For operation of the ISFSI, given flexibility in site selection and the limited size of an ISFSI, the
28 ISFSI can likely be sited to minimize adverse effects on special status species and habitats.
29 Accordingly, the NRC concludes that operation of the ISFSI is not likely to adversely affect listed
30 species, critical habitat, State-listed species, marine mammals, migratory birds, and bald and
31 golden eagles, and would have no adverse impact on essential fish habitat (EFH). In the
32 unlikely situation that the operation of an ISFSI could affect listed species, critical habitat, or
33 EFH, the NRC would be required to initiate ESA Section 7 consultation with the NMFS or FWS
34 (for listed species or critical habitat) and initiate EFH consultation with NMFS (for EFH).

35 **5.11.2 Long-Term Storage**

36 As described above, the NRC would evaluate the impacts on listed species and critical habitat
37 from construction and operation of the ISFSI in a site-specific review as required under the ESA.

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1 This evaluation would include the potential impacts from transfer, handling, and aging
2 management activities, including ISFSI and DTS replacement. If transferring, handling, or aging
3 management resulted in a take of a species not included in a facility's Incidental Take
4 Statement, the NRC would be required to reinitiate ESA Section 7 consultation. During
5 transferring, handling, and aging management activities, facilities with a Biological Opinion
6 would either need to continue to abide by the conditions described in the Biological Opinion or
7 reinitiate consultation if activities occurring at the facility are not covered by the Biological
8 Opinion.

9 During long-term storage, the NRC assumes that the licensee would have to build a DTS. The
10 NRC authorization to construct and operate a DTS would constitute a Federal action under
11 NEPA and would be addressed pursuant to 10 CFR Part 51. Prior to authorization, the NRC
12 would coordinate with FWS and NMFS, or both, to determine the presence of any Federally
13 listed species or critical habitat at or near the site. If Federally listed species or critical habitat
14 occur near the site and could be affected by the facility, the NRC would be required to initiate
15 ESA Section 7 consultation, as described in Section 5.11.1. Because the ISFSI and the DTS
16 would be replaced during the long-term storage timeframe, the NRC anticipates that the impacts
17 on special status species and habitats would be within the bounds of those described above.
18 The potential impacts would most likely be less than the impacts the NRC evaluated in
19 Section 5.11.1, because replacement activities would occur within the plant's operational area
20 adjacent to existing facilities over an extended period of time.

21 As described above, in complying with the ESA, the NRC would evaluate the impacts from an
22 away-from-reactor ISFSI in a site-specific review before the facility is initially constructed and
23 reinitiate consultation if necessary. The NRC would characterize the effects of construction and
24 operations in terms of its ESA findings of (1) no effect, (2) not likely to adversely affect, (3) likely
25 to adversely affect, or (4) is likely to jeopardize the listed species or adversely modify the
26 designated critical habitat of Federally listed species populations or their critical habitat.

27 In addition, coordination with other Federal and State natural resource agencies would further
28 ensure that ISFSI operators take appropriate steps to avoid or mitigate impacts on State-listed
29 species, habitats of concern, and other protected species and habitats. The NRC assumes that
30 these consultations would result in avoidance or mitigation measures that would minimize
31 impacts on protected species and habitats, such as those protected under the Marine Mammal
32 Protection Act, the Migratory Bird Treaty Act, and the Bald and Golden Eagle Protection Act.
33 For example, the NRC would be required to consult with the NMFS if replacement activities for
34 the ISFSI may affect EFH or marine mammals. However, impacts on EFH from long-term
35 storage are not expected because away-from-reactor ISFSIs are built on land and ground-
36 disturbing impacts would have minimal impacts on aquatic habitats, as described in
37 Section 5.10.2.

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Environmental Impacts of Away-From-Reactor Storage

1 Given flexibility in site selection and the limited size of an ISFSI, the ISFSI can likely be sited to
2 minimize adverse effects on special status species and habitats. Accordingly, the NRC
3 concludes that operating and replacing components of the ISFSI are not likely to adversely
4 affect listed species, critical habitat, State-listed species, marine mammals, migratory birds, and
5 bald and golden eagles, and would have no adverse impact on EFH. In the unlikely situation
6 that operating and replacing components of an ISFSI could affect listed species, critical habitat,
7 or EFH, the NRC would be required to initiate ESA Section 7 consultation with the NMFS or
8 FWS (for listed species or critical habitat) and initiate EFH consultation with NMFS (for EFH).

9 **5.11.3 Indefinite Storage**

10 Impacts on special status species and habitats from continued operation of an away-from-
11 reactor ISFSIs if a repository never becomes available would be similar to those described in
12 Section 5.11.2. The same operations and maintenance activities described in Section 5.11.2
13 would occur repeatedly because the spent fuel would remain at the facility indefinitely.

14 As described above, in complying with the ESA, the NRC would evaluate the impacts from an
15 away-from-reactor ISFSI in a site-specific review before the facility is initially constructed and
16 reinitiate consultation if necessary. The NRC would report the effects of construction and
17 operations in terms of its ESA findings of (1) no effect, (2) not likely to adversely affect, (3) likely
18 to adversely affect, or (4) is likely to jeopardize the listed species or adversely modify the
19 designated critical habitat of Federally listed species populations or their critical habitat.

20 Given flexibility in site selection and the limited size of an ISFSI, the ISFSI can likely be sited to
21 minimize adverse effects on special status species and habitats. Accordingly, the NRC
22 concludes that operating and replacing components of the ISFSI are not likely to adversely
23 affect listed species, critical habitat, State-listed species, marine mammals, migratory birds, and
24 bald and golden eagles, and would have no adverse impact on EFH. In the unlikely situation
25 that operating and replacing components of an ISFSI could affect listed species, critical habitat,
26 or EFH, the NRC would be required to initiate ESA Section 7 consultation with the NMFS or
27 FWS (for listed species or critical habitat) and initiate EFH consultation with NMFS (for EFH).

28 **5.12 Historic and Cultural Resources**

29 This section describes historic and cultural resource impacts caused by the continued storage of
30 spent fuel at an away-from-reactor ISFSI.

31 The NRC is considering impacts on historic and cultural resources in this draft GEIS through
32 implementation of its NEPA requirements in 10 CFR Part 51. This rulemaking is not a licensing
33 action; it does not authorize the construction or operation of an away-from-reactor ISFSI, and it
34 does not authorize storage of spent fuel. Because this draft GEIS does not identify specific
35 sites for NRC licensing actions, a National Historic Preservation Act (NHPA) Section 106 review

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1 has not been performed. However, the NRC complies with NHPA Section 106 and the
2 implementing provisions in 36 CFR Part 800 in site-specific licensing actions. As discussed in
3 Section 3.8, identification of historic properties, adverse effects, and potential resolution of
4 adverse effects would be conducted through consultation and application of the National
5 Register of Historic Places criteria in 36 CFR 60.4. This information would also be evaluated to
6 determine the significance of potential impacts on historic and cultural resources in the NRC's
7 environmental review documents.

8 For site-specific licensing actions (new reactor licensing, reactor license renewal, and site-
9 specific at-reactor and away-from-reactor ISFSIs), the NRC complies with Section 106
10 requirements to consider the effects of its undertaking on historic properties. If any historic
11 properties are present, their significance would be determined through application of the
12 National Register of Historic Places criteria. If adverse effects to historic properties are
13 identified, appropriate mitigation can be developed through consultation with the State Historic
14 Preservation Officer, tribal representatives, and other interested parties. Issuance of a site-
15 specific license could be granted at the conclusion of the NRC's safety review and
16 environmental review and compliance with NHPA Section 106 requirements.

17 **5.12.1 Short-Term Storage**

18 NRC authorization to construct and operate an away-from-reactor ISFSI would constitute a
19 Federal action under NEPA and would be an undertaking under the NHPA. In accordance with
20 36 CFR Part 800, the NRC would conduct an NHPA Section 106 review to determine whether
21 historic properties are present in the area of potential effect, and if so, whether construction and
22 operation of the ISFSI would result in any adverse effects on such properties. Prior to
23 submitting an application to construct and operate the ISFSI, the ISFSI applicant would conduct
24 a survey of any areas of proposed development to identify and record historic and cultural
25 resources. Impacts on historic and cultural resources would vary depending on the location of
26 the ISFSI and what resources are present. Resolution of adverse effects, if any, should be
27 concluded prior to the closure of the Section 106 process. After construction is completed,
28 disturbed areas not occupied by ISFSI structures and supporting infrastructure (e.g., access
29 roads, parking areas, and laydown areas) would be reclaimed and revegetated.

30 The environmental impacts on historic and cultural resources from the construction and
31 operation of an away-from-reactor storage facility are informed by the evaluation as described in
32 the PFSF EIS (NRC 2001). The proposed PFSF would have been located on the Reservation
33 of the Skull Valley Band of Goshute Indians, which encompasses 7,200 ha (18,000 ac) in
34 Tooele County, Utah. Storage pads for the canisters and some support facilities would have
35 been located on a 99-ac (40-ha) restricted access area within the PFSF site (NRC 2001).
36 Additional land would have been disturbed for the access road and the new rail line. The NRC
37

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Environmental Impacts of Away-From-Reactor Storage

1 assumes that the amount of land disturbance for an away-from-reactor ISFSI would be similar to
2 the land disturbance for the PFSF, as discussed in the introduction to this chapter and
3 Section 5.1.

4 Extensive work was performed at the PFSF to identify historic and cultural resources on or near
5 the facilities and to evaluate the potential impacts of the project on those resources (NRC 2001).
6 As a result, the NRC concluded that the construction of the rail line would have adversely
7 affected portions of eight historic properties evaluated as eligible for inclusion in the National
8 Register of Historic Places. The NRC included in the PFS license a condition that required the
9 implementation of seven specific requirements for the treatment of historic properties.
10 Operation of the proposed PFSF was not expected to adversely affect historic and cultural
11 resources because no additional ground disturbance would occur.

12 For an away-from-reactor ISFSI, the impacts on historic and cultural resources would be
13 different from those at the PFSF, given the difference in sites. However, several factors could
14 avoid, minimize, or mitigate impacts. These include the following:

- 15 • Any impacts on historic and cultural resources must be addressed under the NHPA in
16 consultation with any affected State or Tribal Historic Preservation Officers, and other
17 interested parties.
- 18 • The land area disturbed is relatively small and any one of a number of alternative sites can
19 be selected.
- 20 • Placement of facilities on the site can be readily adjusted to minimize impacts on any historic
21 and cultural resources in the area, because the facility does not depend on a significant
22 water supply and has limited electrical power needs.
- 23 • Potential adverse effects could also be minimized through development of agreements,
24 license conditions, and implementation of the licensee's historic and cultural resource
25 management plans and procedures to protect known historic and cultural resources and
26 address inadvertent discoveries during construction.

27 However, it may not be possible to avoid adverse effects on historic properties or impacts on
28 historic and cultural resources. The magnitude of adverse effects on historic properties and
29 impacts on historic and cultural resources largely depends on what resources are present, the
30 extent of proposed land disturbance, and if the licensee has management plans and procedures
31 that are protective of historic and cultural resources. The NRC's site-specific environmental
32 review and compliance with the NHPA process could identify historic properties, adverse
33 effects, and potentially resolve adverse effects on historic properties and impacts on other
34 historic and cultural resources. Therefore, the NRC concludes that the potential impacts on
35 historic and cultural resources could range from SMALL, MODERATE, or LARGE, depending
36 on site-specific factors.

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Environmental Impacts of Away-From-Reactor Storage

1 **5.12.2 Long-Term Storage**

2 The NRC assumes that systems, structures, and components of an away-from-reactor ISFSI
3 would be replaced during the long-term storage timeframe. In addition to routine maintenance,
4 the NRC also assumes that a DTS is constructed, operated, and replaced as part of an away-
5 from-reactor ISFSI during the long-term storage timeframe. As discussed in Section 5.1.2 of
6 this draft GEIS, a DTS would be used to transfer the spent fuel canister from its shipping cask
7 into the storage cask, retrieve and repackage spent fuel for aging management activities, or to
8 replace damaged canisters or packages identified during visual inspections. Construction and
9 operation of a DTS at an away-from-reactor ISFSI is described in Section 2.1.4 of this draft
10 GEIS.

11 NRC authorization to construct and operate a DTS and replace the ISFSI and DTS would
12 constitute Federal actions under NEPA and would be undertakings under the NHPA. In
13 accordance with 36 CFR Part 800, a Section 106 review would be conducted for each
14 undertaking to determine whether historic properties are present in the area of potential effect,
15 and if so, whether these actions would result in any adverse effects upon these properties.
16 Impacts on historic and cultural resources can vary greatly depending on the location of the
17 original DTS and the replacement ISFSI and DTS, and what resources are present. For site-
18 specific licensing actions (new reactor licensing, reactor license renewal, and site-specific
19 at-reactor and away-from-reactor ISFSIs), applicants are required to provide historic and cultural
20 resource information in their environmental reports. To prepare these assessments, applicants
21 conduct cultural resource surveys. This information assists NRC in its review of the potential
22 impacts on historic and cultural resources. Section 106 of the NHPA requires the NRC to
23 conduct a site-specific assessment to determine whether historic properties are present in the
24 area of potential effect, and if so, whether construction and operation of a DTS would result in
25 any adverse effect upon these properties. Resolution of adverse effects, if any, should be
26 concluded prior to the closure of the Section 106 process.

27 Impacts from continued operations and routine maintenance during long-term storage would be
28 similar to those described for the short-term storage timeframe. The impacts would be SMALL
29 because there would be no ground-disturbing activities as a result of the continued operations
30 and routine maintenance at the ISFSI.

31 The replacement of the ISFSI and construction and replacement of the DTS would require a
32 site-specific environmental review and compliance with NHPA requirements before making a
33 decision on the licensing action. The NRC assumes that the replacement ISFSI and initial and
34 replacement DTS will be constructed on land near the existing facilities. Ground-disturbing
35 activities occurred during initial ISFSI construction, and much of the land within and immediately
36 surrounding the replacement ISFSI would have already been disturbed. This activity would
37 have eliminated any potential for historic and cultural resources to be present in these portions
38 of the ISFSI site. However, less-developed or disturbed portions of the ISFSI site could contain

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1 historic and cultural resources. Given the large land area available around the ISFSI restricted
2 area, the licensee should be able to locate the replacement facilities away from historic and
3 cultural resources. Potential adverse effects on historic properties or impacts on historic and
4 cultural resources could also be minimized through development of agreements, license
5 conditions, and implementation of the licensee's historic and cultural resource management
6 plans and procedures to protect known historic and cultural resources and address inadvertent
7 discoveries during construction of the replacement ISFSI and initial and replacement DTS.

8 However, it may not be possible to avoid adverse effects to historic properties or impacts on
9 historic and cultural resources. The magnitude of an adverse effect on historic properties and
10 an impact on historic and cultural resources largely depends on what resources are present, the
11 extent of proposed land disturbance, and whether the licensee has management plans and
12 procedures that are protective of historic and cultural resources. The site-specific
13 environmental review and compliance with the NHPA process could identify historic properties,
14 adverse effects, and potentially resolve adverse effects on historic properties and impacts on
15 other historic and cultural resources. Therefore, the potential impacts on historic and cultural
16 resources could range from SMALL, MODERATE, or LARGE, depending on site-specific
17 factors.

18 **5.12.3 Indefinite Storage**

19 The environmental impacts of indefinite spent fuel storage would be similar to those described
20 in Section 5.12.2. The same operations and maintenance activities described in Section 5.12.2
21 would occur repeatedly because the spent fuel would remain at the facility indefinitely. As
22 discussed in Section 5.12.2, if replacement activities occur in previously disturbed areas (i.e., in
23 areas that have previously experienced construction impacts), then impacts on historic and
24 cultural resources would be SMALL. Therefore, historic properties would not be adversely
25 affected. If construction activities occur in previously undisturbed areas or it is not possible to
26 avoid affecting historic and cultural resources, then there could be adverse effects on historic
27 properties, and impacts on historic and cultural resources could range from SMALL,
28 MODERATE, or LARGE, depending on site-specific factors.

29 **5.13 Noise**

30 This section describes noise impacts caused by the continued storage of spent fuel at an away-
31 from-reactor ISFSI.

32 **5.13.1 Short-Term Storage**

33 The assessment of the environmental impacts of noise from the construction and operation of
34 an away-from-reactor ISFSI is informed by those described in the PFSF EIS (NRC 2001).
35 Background noise levels within the vicinity of the PFSF (Skull Valley) are low, as would be

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1 expected for any remote location. The EPA (1974) has provided guideline sound levels below
2 which the general public would be protected from activity interference and annoyance; 55 dBA
3 applies to outdoor locations “in which quiet is a basis for use” and 45 dBA applies to indoor
4 residential areas (NRC 2001).

5 Construction of the ISFSI facility occurs during a small portion of the short-term timeframe. The
6 schedule for the proposed PFSF called for the first stage of construction, which included the
7 major buildings and one-fourth of the total number of proposed storage pads, to last 18 months
8 (NRC 2001). Noise impacts would result from construction equipment used to grade and level
9 the site, excavate the facility foundation, handle building materials, build the ISFSI facilities
10 (e.g., buildings, storage pads, access road, new rail siding, and new rail spur), and from
11 additional construction traffic. Construction equipment associated with these activities can
12 generate noise levels up to 95 dBA (NRC 2001). This noise level applies at a reference
13 distance of 15 m (50 ft) from the source. Noise levels decrease by about 6 dBA for each
14 doubling of distance from the source. At distances greater than about 1.9 km (1.2 mi), expected
15 maximum noise levels would be less than the 55 dBA recommended by the EPA for protection
16 against outdoor activity interference and annoyance (NRC 2001). For the PFSF, construction-
17 related noise levels were expected to be less than 48 dBA in the ambient air at the nearest
18 residences (at a distance of roughly 3 km [2 mi]). Therefore, noise from construction activity
19 was not expected to be annoying for residents located in the nearest houses (NRC 2001).
20 However, for an away-from-reactor ISFSI at a different location, the nearest resident could be
21 closer and noise levels during construction could exceed the EPA recommendation. Whether
22 associated noise impacts could or would be mitigated could only be determined during a site-
23 specific review.

24 Construction would also result in increased vehicle traffic (e.g., commuting workforce,
25 construction vehicles, and material transport) and an associated increase in noise. For the
26 PFSF this would have increased noise levels by 5 dBA (NRC 2001). The impacts of the
27 increase in noise around the ISFSI will depend considerably on the nature of the area through
28 which the traffic is passing. Because the NRC expects that the ISFSI will be built in a remote
29 location with little pre-existing traffic, the noise from the additional traffic is likely to be noticeable
30 and could exceed the EPA recommendation. However, the duration of the most intense portion
31 of the construction period would be limited (roughly 18 months for the PFSF).

32 Operation of the ISFSI would involve transporting, receiving, handling, and storing spent fuel, as
33 well as routine maintenance and monitoring of the ISFSI. Cask transportation, receiving, and
34 handling would be the primary noise sources during operations; the loudest onsite noise source
35 would most likely be the onsite locomotive diesel switch engine. The train whistle from this
36 locomotive could be audible at nearby residences. Momentary noise from routine operation
37 could exceed 100 dBA. However, this locomotive would only operate a few hours per week

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1 (NRC 2001). Because the locomotive would be expected to operate only a few hours per week,
2 indoor and outdoor noise impacts are expected to be minimal.

3 Noise impacts could also be associated with the transportation of spent fuel to the site. In the
4 PFSF EIS (NRC 2001), the NRC estimated that an average of 150 loaded shipping casks would
5 be received at the facility each year, carried by 1 or 2 trains per week, and a similar frequency is
6 assumed for the ISFSI. While the train's whistle would be loud, trains would be passing only
7 infrequently. Therefore, the NRC concludes that the noise impacts resulting from transportation
8 of spent fuel to the ISFSI would be minor.

9 In conclusion, the NRC determined that the construction and operation noise impacts for the
10 away-from-reactor ISFSI could exceed the EPA-recommended levels during some portions of
11 construction and occasionally during operations. However, because of the limited duration of
12 the construction period and the intermittent nature of the noise, the NRC concludes that the
13 overall impacts associated with noise for the construction and short-term operation of the away-
14 from-reactor ISFSI would be SMALL.

15 **5.13.2 Long-Term Storage**

16 The NRC assumes that a DTS is constructed as the duration and quantity of spent fuel in dry
17 cask storage at an onsite storage facility increases. This facility would be used to retrieve and
18 repackage spent fuel for aging management activities or to replace damaged canisters or
19 packages identified during visual inspections. Section 2.1.4 provides a detailed description of
20 the DTS.

21 Construction of a DTS would take approximately 1 to 2 years to complete. Noise levels
22 generated during construction would be similar to those associated with initial construction of
23 the ISFSI. Noise levels during construction could exceed the EPA recommendation at the
24 nearest residence. Whether associated noise impacts could or would be mitigated could only
25 be determined during a site-specific review. There would also be some additional traffic
26 associated with the construction of the DTS, but less than the traffic that would have occurred
27 during initial construction.

28 Noise impacts generated during operation of the ISFSI (e.g., cask handling, movements to and
29 from pads, and routine maintenance and monitoring of the ISFSI) would be the same as during
30 operations for the short-term timeframe, which were minimal.

31 Aging management would require the replacement of the ISFSI (e.g., casks, storage pads, and
32 canister transfer building) and the DTS during the long-term storage timeframe. Storage facility
33 and DTS replacement uses construction equipment that can generate noise levels similar to the
34 original construction of the ISFSI. These noise levels could exceed the EPA recommendation

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1 during replacement activities. Whether associated noise impacts could or would be mitigated
2 could only be determined during a site-specific review.

3 In conclusion, construction of the DTS, although temporary and representing a small portion of
4 the overall timeframe for the spent fuel storage, does generate noise levels that could exceed
5 EPA-recommended noise levels, as would activities to replace storage pads and other
6 structures. However, these activities are temporary and noticeable noise levels would be limited
7 to the nearest receptors. Generally for continued spent fuel storage, the operation noise levels,
8 noise duration, and distance between the noise sources and receptors do not produce impacts
9 noticeable to the surrounding community. Therefore, the NRC concludes that the overall noise
10 impacts during the long-term storage timeframe at an away-from-reactor ISFSI would be
11 SMALL.

12 **5.13.3 Indefinite Storage**

13 The environmental impacts of indefinite spent fuel storage would be similar to those described
14 in Section 5.13.2. The same operations and maintenance activities described in Section 5.13.2
15 would occur repeatedly because the spent fuel would remain at the facility indefinitely. Based
16 on this information, the NRC concludes that the overall noise impacts during indefinite storage
17 at an away-from-reactor ISFSI would be SMALL.

18 **5.14 Aesthetics**

19 This section describes aesthetic resource impacts caused by the continued storage of spent fuel
20 at an away-from-reactor ISFSI.

21 **5.14.1 Short-Term Storage**

22 Development of an away-from-reactor ISFSI would use a larger land area than any at-reactor
23 ISFSI. The ISFSI would likely be sited and constructed in an area remote from population
24 centers and areas sensitive to aesthetic concerns. On the other hand, the ISFSI could be sited
25 and constructed in an area with no existing industrial facilities or similar land disturbance.
26 Therefore, a site-specific analysis of the aesthetic impacts will be required for the proposed
27 facility. The ISFSI could affect local aesthetics to the extent its facility structures and operations
28 (e.g., buildings, dry storage pads and canisters, the rail line, and trains) are visible across any
29 scenic waterbodies or from higher topographic elevations. Lighting that illuminates the storage
30 facilities may increase their visibility. If constructed in an area with no existing industrial
31 development, the ISFSI would be expected to affect the local viewshed. Potential mitigation
32 measures include use of shielded lights to minimize light diffusion at night, planting native
33 vegetation or constructing earthen berms to screen the facility, and using paint colors that blend
34 facility structures with the surrounding landscape, as discussed in the PFSF EIS (NRC 2001).

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1 Further, the NRC considered the aesthetic impacts of spent fuel storage at a consolidated site
2 as part of the PFSF EIS. This evaluation represents the result for an ISFSI built in an area with
3 no previous industrial development. For the PFSF, the NRC found that the visual character of
4 the area surrounding the site would have been negatively affected by development and
5 operation of an industrial facility in an otherwise largely undeveloped rural landscape. The NRC
6 determined that the scenic appeal of the site would have been noticeably changed when viewed
7 from various locations. Because of these anticipated changes to the affected viewshed, the
8 NRC found the aesthetic impacts from the construction and operation of the PFSF to be SMALL
9 to MODERATE (NRC 2001).

10 For an away-from-reactor ISFSI at a different location, the impacts on aesthetic resources would
11 be similar to those for the PFSF if it is built in a location with no previous industrial development.
12 But the impacts could be SMALL if the ISFSI is built in a previously disturbed location (i.e., a
13 brownfield site). Overall, the NRC concludes that the impacts on aesthetic resources would be
14 SMALL to MODERATE.

15 **5.14.2 Long-Term Storage**

16 Aesthetic impacts from transferring and handling spent fuel and aging management activities at
17 an away-from-reactor ISFSI are anticipated to be similar to the impacts described for the
18 construction and short-term operation of the ISFSI described in Section 5.14.1. More
19 specifically, periodic construction and demolition of facilities (including a DTS), although
20 temporary, could cause an increase in aesthetic impacts compared to normal operation of the
21 facility. However, because the replacement of the facilities would occur at an existing site and
22 the activities and structures involved in the replacement are not expected to provide a significant
23 change to what would exist prior to replacement, there would be no noticeable change to the
24 impacts on aesthetic resources.

25 Because the periodic construction, demolition, and operation activities required for aging
26 management would not significantly alter the pre-existing impacts of an away-from-reactor
27 ISFSI, the NRC concludes that the environmental impacts on aesthetic resources due to long-
28 term storage would be SMALL to MODERATE.

29 **5.14.3 Indefinite Storage**

30 If a repository is not available and away-from-reactor ISFSIs are developed, the activities that
31 would be conducted at an away-from-reactor ISFSI would be the same as those described in
32 Section 5.14.2. The same operations and maintenance activities described in Section 5.14.2
33 would occur repeatedly because the spent fuel would remain at the facility indefinitely. Based
34 on this information, the NRC concludes that the aesthetic impacts during long-term storage at
35 an away-from-reactor ISFSI would be SMALL to MODERATE.

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1 **5.15 Waste Management**

2 This section describes impacts from low-level radioactive waste (LLW), mixed waste, and
3 nonradioactive waste management and disposal resulting from the continued storage of spent
4 fuel at an away-from-reactor ISFSI. See Section 3.11 for a description of the different types of
5 waste and typical disposal methods for the wastes. See Section 4.15 for a description of the
6 types of waste generated from the operation, maintenance, and replacement of an at-reactor
7 ISFSI; they are the same types of waste produced by the operation, maintenance, and
8 replacement of an away-from-reactor ISFSI. However, the away-from-reactor ISFSI is a much
9 larger facility than an at-reactor ISFSI and therefore would generate a higher volume of waste.

10 **5.15.1 Short-Term Storage**

11 Assessment of the environmental impacts from the handling and disposal of LLW, mixed waste,
12 and nonradioactive waste from an away-from-reactor ISFSI is informed by those described in
13 the PFSF EIS (NRC 2001). The PFSF was designed with a capacity of 40,000 MTU and the
14 NRC has assumed a facility of similar size and characteristics for the away-from-reactor ISFSI.
15 Because a similar facility is assumed, the quantities of the various wastes generated at the
16 ISFSI would also be similar to those identified for the PFSF.

17 The construction of the PFSF would have included construction of major buildings (e.g.,
18 administration and laboratory) and 500 concrete storage pads. Construction activities would
19 have generated excavation and construction debris, vegetation debris, and backfill (NRC 2001).
20 For an away-from-reactor ISFSI, the construction debris would typically be disposed of at a local
21 landfill. The excavation and backfill material could likely be reused for other purposes (e.g.,
22 building an earthen berm or to level low-lying areas). For the PFSF, the amount of soil
23 excavated was estimated to be 153,500 m³ (200,800 yd³). All of this material was expected to
24 remain onsite for other uses. This is consistent with NRC experience with other applications
25 (e.g., new reactors), for which excavation materials are used or disposed of on the site.

26 Operation of an away-from-reactor ISFSI, like the PFSF, would involve limited waste-generating
27 activities. The types of wastes generated would be similar to those for an onsite ISFSI, as
28 described in Section 4.15.1, but on a larger scale. Small quantities of LLW would be generated
29 during routine operation, including maintenance and environmental monitoring. This waste
30 would be managed according to 10 CFR Part 20. Because (1) LLW would continue to be
31 managed according to Federal regulations and (2) the disposal capacity for LLW is expected to
32 be available when needed (see Section 1.8.3), the NRC determines the impacts from LLW
33 management and disposal would be minor during short-term storage.

34 Operation and maintenance of the ISFSI would be expected to generate minimal to no mixed
35 waste. Like other industrial facilities, small quantities of nonradioactive waste would be

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1 generated from routine operations and maintenance, including municipal waste and hazardous
2 wastes, such as paint waste, pesticides, cleaning supplies (NRC 2001). Sanitary wastes would
3 be handled in accordance with regulatory requirements and disposed of at an appropriately
4 permitted disposal facility. The wastes would be managed and disposed of according to
5 regulatory requirements.

6 The NRC considered the impacts of solid and sanitary wastes due to spent fuel storage at a
7 consolidated site as part of the PFSF EIS. This evaluation found that impacts from managing
8 solid and sanitary wastes during construction and operation of the PFSF would have been
9 SMALL (NRC 2001). Because of the small quantities of waste involved, the NRC concludes
10 that the impacts of managing and disposing of LLW, mixed waste, and nonradioactive waste
11 generated at an away-from-reactor ISFSI would be SMALL.

12 **5.15.2 Long-Term Storage**

13 Routine maintenance would continue to occur in the same manner as described in
14 Section 5.15.1, generating minimal amounts of waste. Waste management and disposal
15 activities related to the construction and operation of a DTS, and the replacement of casks,
16 pads, the canister transfer building, and DTS facilities at an away-from-reactor ISFSI, are
17 discussed below. The repackaging of spent fuel, construction and operation of a DTS, and
18 ISFSI and DTS replacement are not expected to generate mixed waste. However, if mixed
19 waste is generated, it would be a small fraction of that generated by an operating nuclear power
20 plant and it would be managed according to regulatory requirements.

21 As described in Section 4.15.2.1, the construction of a DTS would not be expected to generate
22 LLW but would generate nonradioactive wastes similar to, but on a much smaller scale than, the
23 original construction of the ISFSI. The NRC expects that the material that is excavated for the
24 DTS would be disposed of onsite.

25 For this analysis, because the activities associated with the replacement of the casks and ISFSI
26 facilities are similar to decommissioning activities, the waste impacts from the replacement of
27 casks and concrete pads are based on the decommissioning impacts considered in the PFSF
28 EIS. Replacing the ISFSI would entail removing about 500 concrete storage pads. Each
29 storage pad has the dimensions of 20 m × 9 m × 0.9 m. In its license application, PFS assumed
30 at least 10 percent of the total storage pad surface area would need to be decontaminated. The
31 decontamination of the 500 concrete storage pads at the PFSF would have generated an
32 additional 8.5 m³ (11 yd³) of LLW. If the storage pads are removed in their entirety,
33 approximately 85,500 m³ (112,000 yd³) of material would need to be disposed of, either as LLW
34 or nonradioactive waste (NRC 2001). These activities would occur over an extended period of
35 time.

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1 The repackaging process consists of removal of the spent fuel assemblies from the old canister
2 and placement into a new one. Once the canister has been removed from the cask, the cask is
3 surveyed for residual radioactivity. If levels are below NRC limits, the casks can be disposed of
4 as nonradioactive solid waste. If levels are above NRC limits, the cask material would be
5 disposed of as LLW. The PFSF was expected to hold 4,000 storage casks that would need to
6 be replaced approximately every 100 years. Donnell (1998) estimated that the
7 decommissioning of one storage cask at the PFSF would generate 0.34 m³ (0.45 yd³) of
8 compacted LLW. Using this volume, the dismantling of 4,000 storage casks as part of ISFSI
9 replacement would generate 1,360 m³ (1,779 yd³) of compacted LLW over an extended period
10 of time. In addition, replacement of the 4,000 casks would generate 162,000 m³ (212,000 yd³)
11 of nonradioactive waste.

12 Although the exact amount of LLW and nonradioactive waste depends on the level of
13 contamination, the quantity of waste generated from the replacement of the storage casks and
14 concrete storage pads is still expected to be a fraction of the LLW generated during reactor
15 decommissioning, which was previously determined to have a SMALL impact in the “Generic
16 Environmental Impact Statement for License Renewal of Nuclear Plants” (NRC 2013a).
17 Because (1) LLW would continue to be managed according to Federal regulations and (2) the
18 disposal capacity for LLW is expected to be available when needed (see Section 1.8.3), the
19 NRC determines the impacts from LLW management and disposal would be minor during long-
20 term storage. Therefore, the NRC determines that the potential environmental impacts from
21 LLW, mixed waste, and nonradioactive waste for long-term storage at an away-from-reactor
22 ISFSI would be SMALL for each waste stream.

23 **5.15.3 Indefinite Storage**

24 This section describes the potential environmental impacts from the management and disposal
25 of LLW, mixed waste, and nonradioactive waste if a repository is not available to accept spent
26 fuel. For this analysis, the NRC assumes that spent fuel would continue to be stored at an
27 away-from-reactor ISFSI indefinitely. The waste-generating activities during this timeframe
28 include the same activities discussed in Section 5.15.2 but with the activities occurring
29 repeatedly. Those impacts were determined to be SMALL based on previous analyses that
30 assumed a repository would be available.

31 The activities associated with the management and disposal of LLW from indefinite away-from-
32 reactor storage of spent fuel would be similar to those described for long-term storage. As
33 stated in Section 1.8.3, it is expected that sufficient LLW disposal capacity will be made
34 available when needed. Similar to long-term storage, the NRC concludes the management and
35 disposal of LLW could result in SMALL environmental impacts during indefinite storage of spent
36 fuel. However, in this timeframe, because nonradioactive waste would continue to be generated
37 indefinitely, even with continued implementation of and adherence to regulatory requirements,
38 there could be noticeable impacts on the local and regional landfill capacity. Therefore, the

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1 NRC determines that the environmental impacts from the indefinite management and disposal
2 of nonradioactive waste would be SMALL to MODERATE.

3 **5.16 Transportation**

4 This section describes transportation impacts caused by the continued storage of spent fuel at
5 an away-from-reactor ISFSI. Noise impacts from transportation activities are evaluated in
6 Section 5.13 and air emissions are evaluated in Section 5.4. The transportation activities to
7 move spent fuel to an away-from-reactor ISFSI are included in this section. In considering
8 impacts related to the transportation of spent fuel from reactors to the away-from-reactor ISFSI,
9 the NRC considers both the information in Table S-4⁶ (10 CFR 51.52),⁷ and the analysis of
10 spent fuel transportation provided in the PFSF EIS (NRC 2001). Activities and impacts
11 associated with moving spent fuel from the away-from-reactor ISFSI to a repository are
12 addressed as cumulative impacts in Chapter 6.

13 **5.16.1 Short-Term Storage**

14 This analysis considers the impacts of transportation activities associated with construction and
15 short-term operation of an away-from-reactor ISFSI on the affected environment beyond the site
16 boundary. The environmental impacts evaluated include impacts on regional traffic from worker
17 commuting, supply shipments, shipment of spent fuel to the ISFSI, and nonradiological and
18 radiological waste shipments. Impacts on traffic from workers commuting to and from the away-
19 from-reactor storage site depend on the size of the workforce, the capacity of the local road
20 network, traffic patterns, and the availability of alternate commuting routes to and from the
21 facility.

22 Construction transportation activities involve workers commuting to and from the site and
23 shipping construction equipment, supplies, and waste materials. In the prior analysis of impacts
24 from constructing the PFSF, the NRC concluded the initial construction phase (e.g., major
25 buildings, approximately 25 percent of the proposed storage pads, the access road, a new rail
26 siding, and new rail line) would have the largest transportation impacts during construction
27 based on a total workforce of 255, split almost evenly between work on the site and work on the
28 rail line (NRC 2001). The NRC considers the amount of transportation (additional number of
29 vehicles on the road) from the PFSF EIS to be representative of the transportation for the away-
30 from-reactor ISFSI because the facilities are the same size. For the first phase of construction
31 for the PFSF, lasting about 18 months, the NRC concluded that the impacts on local

⁶ Table S-4 was prepared based on the assumption that spent fuel would be shipped from the reactor site to a reprocessing facility. However, because the analysis is addressing impacts that occur during transportation of the spent fuel, the type of facility to which it is being sent is not important. Therefore, the information provided by Table S-4 can be considered by the NRC in evaluating the impacts of the transportation of spent fuel from reactor sites to an away-from-reactor ISFSI.

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1 transportation would have been SMALL to MODERATE. That analysis also found the
2 transportation impacts of completing remaining facility construction would diminish along with a
3 concurrent decline in the need for equipment, materials, and construction workers. The prior
4 analysis concluded traffic impacts and increased wear and maintenance requirements would be
5 highest (moderate impact) on local roads with low average daily traffic and less pronounced
6 (small) for major transportation routes that have higher capacities. Specifically, peak
7 construction traffic involving supply shipments and commuting workers was estimated at
8 450 vehicle trips per day (NRC 2001). This traffic was being added to local roads with annual
9 average daily traffic counts between 325 and 565 vehicles per day (an increase in traffic ranging
10 from 79 to 130 percent). This change in local traffic previously evaluated for the PFSF changed
11 the level of service resulting in a conclusion of moderate impacts on traffic. Transportation of
12 cask materials to construct 200 casks per year (an additional 6 truck trips per day) was also
13 previously evaluated for the PFSF as not significantly adding to the daily traffic or projected
14 impacts.

15 The impacts on traffic from construction of an away-from-reactor ISFSI at a different location are
16 likely to be similar. The amount of additional traffic is not very large but because the ISFSI will
17 likely be built in a remote location with limited existing roads, the impacts on local traffic may still
18 be noticeable but not destabilizing. If the location of the ISFSI has an extensive existing road
19 network, then the impacts may not be noticeable.

20 Construction of a rail line and siding to the PFSF would have required the movement of large
21 quantities of excavated soils, ballast, and sub-ballast as well as the transportation of workers to
22 construction areas and the same would be true for the away-from-reactor ISFSI, for which a
23 similar rail line is assumed. The previous NRC impact analysis indicated that most materials
24 and workers would be expected to travel to the site of the proposed rail siding by the interstate
25 highways. Construction of the proposed rail line and siding would have required approximately
26 245,000 m³ (320,000 yd³) of ballast and sub-ballast (composed of crushed gravel or rock)
27 obtained from existing commercial gravel pits in the area. Assuming a per-truck capacity of
28 approximately 15.3 m³ (20 yd³) for movement of the ballast and sub-ballast, a total of
29 approximately 32,000 two-way truck trips would have been required to transport the ballast and
30 sub-ballast or 134 truck trips per day or approximately 13 vehicles per hour. The rail line
31 construction workforce was estimated to be 125 workers contributing 250 vehicle trips per day
32 for a total of 384 vehicle trips per day for rail line construction. This level of traffic was
33 4.5 percent of the interstate traffic; therefore, the NRC concluded impacts on transportation by
34 construction of the rail line would have been small although temporarily adverse to feeder road
35 traffic (e.g., noticeable but not destabilizing).

36 The impacts on traffic of building a rail line to an away-from-reactor ISFSI at a different location
37 are likely to be similar. The amount of additional traffic is not very large, but because the ISFSI
38 will likely be built in a remote location with limited existing roads, the impacts on local traffic may

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1 still be noticeable but not destabilizing. If the location of the ISFSI has an extensive existing
2 road network, then the impacts may not be noticeable.

3 Operation of an away-from-reactor ISFSI would result in small impacts on the local
4 transportation system due to daily commuting of workers and shipment of fabricated steel liners
5 for the storage casks and spent fuel shipping casks. The NRC previously estimated for the
6 PFSF that an operations workforce of 43 workers would commute each day using individual
7 private vehicles or light trucks. These workers would account for an increase of 86 vehicle trips
8 per day on local roads during operations. The previous NRC analysis of impacts of the PFSF
9 concluded this decrease in the volume of traffic generated by the storage facility relative to
10 construction activities would not result in any degradation of the level of service on local roads
11 (NRC 2001). Because of the small number of trips involved, the NRC concludes that the traffic
12 impacts for an away-from-reactor ISFSI at a different location would also not be noticeable.

13 During the operation of the away-from-reactor ISFSI, spent fuel would be shipped from power
14 plants to the facility. These shipments would be required to comply with applicable NRC and
15 U.S. Department of Transportation (DOT) regulations for the transportation of radioactive
16 materials in 10 CFR Part 71 and 49 CFR Parts 171–189. The radiological impacts on the public
17 and workers of spent fuel shipments from a reactor have been previously evaluated by the NRC
18 and found to be SMALL in several evaluations. A generic impact determination in
19 10 CFR 51.52, Table S–4, and the supporting analysis (AEC 1972) concluded that the
20 environmental impacts of transportation of fuel and waste to and from a light water reactor
21 under normal operations of transport and accidents in transport would be small.

22 The results of subsequent analyses of transportation impacts in “Final Environmental Statement
23 on Transportation of Radioactive Material by Air and Other Modes” (NRC 1977) and
24 “Reexamination of Spent Fuel Shipment Risk Estimates” (Sprung et al. 2000) confirmed that
25 spent fuel transportation impacts are small. Additional site-specific analyses of transportation
26 impacts for power plants that did not meet the conditions of 10 CFR 51.52 also concluded that
27 the transportation radiological impacts would be small (NRC 2006b, 2008b, 2011a–d, 2013b).
28 The NRC recently calculated spent fuel transportation risks for individual shipments under
29 incident-free and accident conditions in “Spent Fuel Transportation Risk Assessment Draft
30 Report for Comment” (NRC 2012a) based on current models, data, and assumptions. The
31 analysis modeled shipping cask response to accident conditions, such as impact force and fire,
32 and calculated risks considering a range of truck and rail accidents of different severities,
33 including those involving no release or loss of shielding, loss of shielding only, or loss of
34 shielding and release. That analysis reconfirmed that the radiological impacts from spent fuel
35 transportation conducted in compliance with NRC regulations are low. The NRC concluded that
36 the regulations for transportation of radioactive material are adequate to protect the public
37 against unreasonable risk of exposure to radiation from spent fuel casks in transport (NRC
38 2012a).

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1 Considering that an away-from-reactor ISFSI would also receive shipments of spent fuel from
2 more than one power plant, the radiological and nonradiological impacts from a comparable
3 transportation scenario were previously evaluated for the PFSF (NRC 2001). That analysis
4 calculated incident-free and accident risks from the shipment of 4,000 spent fuel casks,
5 transported over a representative route from Maine to Utah over a 20-year period, and
6 concluded the radiological impacts would have been SMALL. The resulting cumulative dose to
7 the maximally exposed individual at the end of the 20-year period was 0.022 mSv (2.2 mrem).⁷
8 The maximally exposed individual is an individual that is assumed for the purpose of bounding
9 to be exposed to the radiation from all shipments. By comparison, NRC regulations at
10 10 CFR 20.1301 limit the annual radiation dose to any member of the public resulting from any
11 licensed activity to 1 mSv (100 mrem). The PFSF incident-free and accident risk results were
12 bounded by or comparable to results in 10 CFR 51.52, Table S-4, or the “Final Environmental
13 Statement on Transportation of Radioactive Material by Air and Other Modes” (NRC 1977).
14 Based on the PFSF analysis, the NRC concludes in the present analysis that the additional
15 accumulated impacts from transportation of the entire inventory of spent fuel from multiple
16 reactors to an away-from-reactor ISFSI would also be minor.

17 The operation of the away-from-reactor ISFSI would generate a small amount of LLW (e.g.,
18 used personal protection equipment) that would result in infrequent waste shipments to a
19 licensed disposal facility. The small and infrequent number of shipments and compliance with
20 NRC and the DOT packaging and transportation regulations would also limit potential worker
21 and public radiological and nonradiological impacts from these waste shipments. Based on this
22 analysis, the NRC concludes the impacts on traffic and to public and worker radiological and
23 nonradiological safety from LLW shipments resulting from spent fuel storage activities beyond
24 the licensed life of reactor operation would be small.

25 Based on the factors discussed above, the NRC concludes the impacts on traffic and public and
26 worker radiological and nonradiological safety from construction and operation activities for an
27 away-from-reactor ISFSI during short-term storage would be SMALL to MODERATE. The
28 potential for a MODERATE impact is related to traffic and would depend on the characteristics
29 at a particular site.

30 **5.16.2 Long-Term Storage**

31 During the long-term storage timeframe, the NRC assumes aging management activities would
32 begin to identify stored spent fuel canisters requiring replacement. To evaluate the potential
33 impacts, the NRC assumes a spent fuel DTS would be constructed to execute the replacement
34 of canisters and casks. This facility would provide the capability to repackage spent fuel to
35 replace damaged canisters or packages identified during regular inspections or aging

⁷ By way of comparison, the average annual dose to individuals from natural background radiation (e.g., solar radiation and radon) is 3.11 mSv/yr (311 mrem/yr) (NRC 2011a).

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1 management activities. The longer duration of storage is assumed to require eventual
2 replacement of the away-from-reactor ISFSI and DTS facilities during the long-term storage
3 timeframe. These replacement activities would generate additional waste material shipments.

4 The construction of a DTS would likely involve a smaller temporary workforce than the original
5 construction workforce. A previously reviewed proposal to construct a spent fuel transfer facility
6 at the Idaho National Engineering Laboratory (NRC 2004) estimated a construction workforce of
7 250 workers that would be employed for 2 years. Because the proposed Idaho transfer facility
8 was designed to transfer a larger variety wastes than would be handled at an away-from-reactor
9 storage facility, the NRC assumes the Idaho facility bounds the impacts of constructing a DTS at
10 an away-from-reactor ISFSI. The resulting daily two-way traffic trips from this workforce
11 (500 trips) would be comparable to the construction workforce traffic evaluated in Section 5.16.1
12 for initial storage facility construction and therefore traffic impacts would range from not
13 noticeable to noticeable but not destabilizing. Operation of the dry spent fuel transfer facility
14 would involve fewer workers than the construction workforce (60 workers were previously
15 projected for operation of the Idaho transfer facility [NRC 2004]), and therefore the commuting
16 traffic impacts during the operational period would be minor.

17 The operation of the DTS would involve shipment of materials including new canisters and
18 would generate a small amount of LLW (e.g., used canisters and used personal protection
19 equipment) that would result in infrequent waste shipments to a licensed disposal facility. The
20 small and infrequent number of shipments and compliance with NRC and DOT packaging and
21 transportation regulations would also limit potential worker and public radiological and
22 nonradiological impacts from these waste shipments. Based on this analysis, the NRC
23 concludes the impacts on traffic and to public and worker radiological and nonradiological safety
24 from LLW shipments resulting from spent fuel storage activities during the long-term storage
25 timeframe would be minimal.

26 The replacement of the storage facility and increase in repackaging would generate additional
27 nonradiological and LLW that would need to be shipped offsite for disposal. As described in
28 Section 5.15.2, the estimated quantity of waste from the replacement of storage casks and
29 storage pads would be about 249,000 m³ (326,000 yd³) of nonhazardous waste or LLW.
30 Assuming this waste is shipped in roll-off containers with a capacity of 15 m³ (20 yd³), the total
31 number of truck shipments estimated is 16,300. If replacement were phased over a 5-year
32 period and shipping occurred 5 days per week, 12.5 shipments per day would be needed. The
33 activities would not significantly increase the magnitude of traffic generated by storage
34 operations occurring each year, and operational transportation impacts would continue to be
35 minor.

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1 Based on the preceding analysis, the overall transportation impacts of continued operations of
2 the away-from-reactor ISFSI during the long-term storage timeframe would be SMALL to
3 MODERATE. The potential for a MODERATE impact is related to traffic and would depend on
4 the characteristics at a particular site.

5 **5.16.3 Indefinite Storage**

6 Assuming no repository becomes available, spent fuel would be stored indefinitely in the away-
7 from-reactor ISFSI. Annual transportation activities and associated environmental impacts
8 would be similar to that analyzed for storage facility operations and DTS construction and
9 operations evaluated in Section 5.16.2. The same operations and maintenance activities
10 described in Section 5.16.2 would occur repeatedly because the spent fuel would remain at the
11 facility indefinitely. Based on this information, the NRC concludes that the transportation
12 impacts during indefinite storage at an away-from-reactor ISFSI would be SMALL to
13 MODERATE. The potential for a MODERATE impact is related to traffic and would depend
14 on the characteristics at a particular site.

15 **5.17 Public and Occupational Health**

16 This section describes public and occupational health impacts caused by the continued storage
17 of spent fuel at an away-from-reactor ISFSI. For the purposes of assessing radiological
18 impacts, impacts are considered to be SMALL if releases and doses do not exceed dose limits
19 prescribed by NRC regulations. This definition of SMALL applies to occupational doses as well
20 as to doses to individual members of the public.

21 Transportation-related public and occupational health impacts are addressed in Section 5.16.

22 **5.17.1 Short-Term Storage**

23 In the PFSF EIS (NRC 2001), the NRC examined human health impacts related to construction
24 and operation of a consolidated dry cask storage facility. The analysis addressed in detail the
25 human health impacts resulting from construction, operation, and potential accidents at the
26 proposed PFSF site. This included nonradiological impacts from construction and operation of
27 the proposed PFSF, as well as analysis of the radiological impacts from the spent nuclear fuel
28 stored at the facility, including potential radiological accidents and their consequences. The
29 type and frequency of nonradiological injuries and the types of pollutant emissions at an away-
30 from-reactor ISFSI would be similar to those for the PFSF because of the similarities between
31 the facilities. The types of radiological releases from the two facilities would also be similar for
32 the same reason.

33 The nonradiological health impacts from the construction of a facility of this size include the
34 normal hazards associated with construction, such as pollutants (e.g., dust), and fatal and

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1 nonfatal occupational injuries, such as falls or overexertion. The detailed analysis in the PFSF
2 EIS used extensive data from the Bureau of Labor Statistics and the Occupational Safety and
3 Health Administration, as well as discussion of the requirements of the Occupational Safety and
4 Health Administration's General Industry Standards (29 CFR Part 1910) and Construction
5 Industry Standards (29 CFR 1926) to conclude that the nonradiological health impacts would
6 have been SMALL. The results were typical for an industrial facility of this size, and would be
7 just as applicable to a similarly sized away-from-reactor ISFSI at any location. Impacts of
8 nonradiological accidents during operations would be even less because of the smaller
9 workforce and because activities carried out during operations will generally be lower risk
10 activities (e.g., monitoring). Therefore, the NRC concludes that human health impacts from
11 construction and operation of the ISFSI would be minor.

12 Radiological impacts at an away-from-reactor ISFSI would not occur until operation commenced
13 and spent nuclear fuel storage casks were brought on site. The detailed analyses in the PFSF
14 EIS used the review and evaluation of the PFSF Safety Analysis Report to assess the
15 radiological impacts on the general public (i.e., potential dose to a hypothetical maximally
16 exposed individual located at the boundary of the proposed facility as well as known nearby
17 residents) and estimated dose to occupational personnel.

18 The analyses presented in the PFSF EIS (NRC 2001) provide evidence that public and
19 occupational doses would have been maintained significantly below the dose limits established
20 by 10 CFR Part 72 and 10 CFR Part 20. The NRC assumes that an away-from-reactor ISFSI at
21 any site has the same spent fuel capacity and a similar physical size; therefore, doses to
22 workers and to the public would be similar to those calculated for the PFSF. The NRC
23 concludes that public and occupational health impacts would be SMALL.

24 **5.17.2 Long-Term Storage**

25 As discussed in the previous section, in the PFSF EIS (NRC 2001) the NRC examined human
26 health impacts related to construction and operation of a consolidated ISFSI. The analysis
27 addressed in detail the public and occupational human health impacts resulting from
28 construction, operation, and potential accidents at the proposed PFSF site. The occupational
29 tasks were grouped into four categories consisting of (1) handling (i.e., receiving, transferring,
30 and moving) of the spent fuel canisters and casks; (2) security, inspection, and maintenance
31 activities; (3) administration and management; and (4) facility construction. The analyses for
32 categories 1, 2, and 3 provide a similar analysis for the transferring, handling, and aging
33 management activities that would be required for long-term storage of spent fuel being
34 addressed by this draft GEIS. The analyses presented in the PFSF EIS (NRC 2001) provide
35 evidence that public and occupational doses would be maintained significantly below the dose
36 limits established by 10 CFR Part 72 and 10 CFR Part 20. In addition, these regulations would
37 also require a licensed away-from-reactor ISFSI to maintain an ALARA (as low as reasonably
38 achievable) program, which would likely reduce the doses described in the PFSF EIS (NRC

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1 2001). The NRC assumes that an away-from-reactor ISFSI at any site has the same spent fuel
2 capacity and a similar physical size; therefore, doses to workers and to the public would be
3 similar to those calculated for the PFSF. The NRC concludes that public and occupational
4 health impacts from operations during the long-term storage timeframe would be minor.

5 During the long-term storage timeframe, the NRC expects that the licensee would have to build
6 a DTS for repackaging of spent fuel canisters. The operation of the DTS would involve
7 increased doses to workers and a very small increase in dose levels at the site boundary
8 (estimated at roughly 0.8 km [0.5 mi] based on the size of the site). However, the licensee
9 would still be required to comply with the dose limits established by 10 CFR Part 72 and 10 CFR
10 Part 20. In addition, the NRC assumes that the casks, pads, canister transfer building, and DTS
11 would require replacement during the long-term storage timeframe. The health impacts related
12 to these activities would be similar to those for the original construction of the facility, although
13 replacement activities would take place over a longer period of time.

14 Based on the information above, the NRC concludes that the public and occupational health
15 impacts of ISFSI operations and construction and demolition activities during the long-term
16 timeframe of storage would be SMALL.

17 **5.17.3 Indefinite Storage**

18 The public and occupational impacts of continuing to store spent fuel without a repository would
19 be similar to those described in Section 5.17.2. The types of activities (operation, maintenance,
20 and replacement) and associated human health impacts would remain the same. The main
21 difference is that these activities would be repeated over a longer period of time. Based on this
22 information, the NRC concludes that the impacts on human health during long-term storage at
23 an away-from-reactor ISFSI would be SMALL.

24 **5.18 Environmental Impacts of Postulated Accidents**

25 In this section, the NRC considers the environmental impacts of postulated accidents involving
26 continued storage of spent fuel at an away-from-reactor ISFSI. The fuel will be stored in dry
27 storage casks licensed by the NRC. As discussed in Chapter 1, the NRC assumes that a DTS
28 would be constructed to facilitate canister and cask replacement for long-term and indefinite
29 storage. The consequences of accidents for a dry cask storage facility are summarized in
30 Sections 4.18.1.2 and 4.18.2.2. The types and consequences of accidents for the away-from-
31 reactor ISFSI are represented by the dry cask storage facility results because of the similarities
32 between the at-reactor ISFSIs and any away-from-reactor ISFSI (i.e., because the types of
33 casks used to store the fuel and the process for licensing those casks are the same).

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1 This section of the draft GEIS follows a different format than the rest of the document. Because
2 the impacts from accidents are substantially the same across the three timeframes – short-term,
3 long-term, and indefinite – the draft GEIS presents the various accident types only once.

4 NRC regulations at 10 CFR Part 72, “Licensing Requirements for the Independent Storage of
5 Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater than Class C
6 Waste,” require that structures, systems, and components important to safety shall be designed
7 to withstand the effects of natural phenomena (such as, earthquakes, tornadoes, hurricanes)
8 and human-induced events without loss of capability to perform their safety functions. NRC
9 siting regulations at 10 CFR Part 72, Subpart E, “Siting Evaluation Factors,” also require
10 applicants to consider, among other things, physical characteristics of sites that are necessary
11 for safety analysis or that may have an impact on plant design (e.g., the design earthquake).
12 These characteristics are to be identified and characterized so that they may be taken into
13 consideration when determining the acceptability of the site and design criteria of the facility.

14 In the PFSF EIS, the NRC examined environmental impacts from accidents at the proposed
15 PFSF. This included two events (i.e., extreme winds and 100 percent air duct blockage) that
16 could cause higher-than-normal radiation exposures to workers. In that analysis, the NRC
17 postulated that the high-wind event resulted in wind-borne missiles that damaged the concrete
18 overpack, which resulted in reduced shielding. The reduced shielding would cause slightly
19 higher occupational doses and only negligible increases in radiation doses to a member of the
20 public at the boundary of the owner-controlled area. The NRC considered the occupational
21 doses that would be received upon transfer of the undamaged canister to a replacement cask.
22 The NRC estimated that the dose from transfer operations would result in a collective
23 occupational dose of 2.47 person-mSv (247 person-mrem). In the second event involving
24 blocked vents, the NRC estimated that the dose to a worker that removes the blockage from the
25 vents would be 0.586 mSv (58.6 mrem) to the hands and forearms, and 0.386 mSv (38.6 mrem)
26 to the chest, which is below regulatory limits for workers (NRC 2001). Because of the
27 similarities between the PFSF and any away-from-reactor ISFSI (i.e., because the types of
28 casks used to store the fuel and the process for licensing those casks are the same), the results
29 would be similar to those for the PFSF. Therefore, the impacts of these accidents would be
30 minor.

31 In addition to the credible events described above, for the PFSF the NRC also considered an
32 accident, not considered credible, in which a canister leaks. The NRC estimated that the
33 resulting total effective dose equivalent resulting from a 30-day leak to an individual at the
34 owner-controlled area boundary was 0.76 mSv (76 mrem). Radiation doses after the first
35 30 days that result from radioactive material deposited on the ground were 0.027 mSv/yr
36 (2.7 mrem/yr) (NRC 2001). These values are below dose limits in 10 CFR Part 20 and
37 10 CFR 72.106. As a result, NRC determined that these impacts would have been SMALL

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1 (NRC 2001). Because of the similarities between the facilities, the results would be similar for
2 any away-from-reactor ISFSI and the impacts would be minor.

3 While the results described from the PFSF EIS are specific to that facility, the PFSF and away-
4 from-reactor ISFSI are similar and subject to the same regulations for casks and operations.
5 The NRC therefore concludes that these results are representative of the impacts for an away-
6 from-reactor ISFSI at a different location. Therefore, the NRC concludes that the impacts of
7 postulated accidents would be SMALL during the three storage timeframes.

8 **5.19 Potential Acts of Sabotage or Terrorism**

9 Section 4.19 provides background regarding the NRC approach to addressing acts of terrorism
10 in relation to dry cask storage. That information is also applicable to an away-from-reactor
11 ISFSI. As with the accident impacts analysis in Section 5.18, the impacts from terrorist acts are
12 substantially the same across the three timeframes – short-term, long-term, and indefinite – and
13 are therefore discussed only once.

14 The same safeguards regulations (10 CFR Part 72, Subpart H) apply to both an at-reactor ISFSI
15 under a site-specific license and an away-from-reactor ISFSI. Safeguard requirements at at-
16 reactor specifically licensed ISFSIs are described in Sections 4.19.3 and 4.19.4 of this draft
17 GEIS. In those sections, the NRC concluded that both the probability and consequences of a
18 successful attack on an at-reactor ISFSI are low and, therefore, the environmental risk is
19 SMALL. Based on this, the NRC concludes that the results from Sections 4.19.3 and 4.19.4
20 would also be applicable to an away-from-reactor ISFSI, and the associated impacts would be
21 SMALL during the three storage timeframes.

22 **5.20 Summary**

23 The impact levels determined by the NRC in the previous sections for away-from-reactor dry
24 cask storage of spent fuel are summarized in Table 5-1. For most impact areas, the impact
25 levels are denoted as SMALL, MODERATE, and LARGE as a measure of their expected
26 adverse environmental impacts. In other impact areas, the impact levels are denoted according
27 to the types of findings required under applicable regulatory or statutory schemes (e.g.,
28 “disproportionately high and adverse” for environmental justice impacts).

29 For a number of the resource areas, the impact determinations for all three timeframes are
30 SMALL. For air quality and terrestrial ecology, there is the potential for a MODERATE impact
31 during the construction of the ISFSI. For environmental justice, special status species and
32 habitats, and historic and cultural resources, the results are highly site-specific. While it is
33 possible the ISFSI could be built and operated with no noticeable impacts on these resources, a
34 definitive conclusion cannot be drawn in this draft GEIS. For socioeconomics (taxes),

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1 aesthetics, and traffic, there are impacts that could be greater than SMALL that will continue
 2 throughout the existence of the ISFSI. The tax impacts are beneficial in nature. Finally, there is
 3 the potential for a MODERATE impact from the disposal of nonradioactive waste in the
 4 indefinite timeframe if that waste exceeds the capacity of nearby landfills.

5 **Table 5-1.** Summary of Environmental Impacts of Continued Away-from-Reactor Storage

Resource Area	Short-Term Storage	Long-Term Storage	Indefinite Storage
Land Use	SMALL	SMALL	SMALL
Socioeconomics	SMALL (adverse) to LARGE (beneficial)	SMALL (adverse) to LARGE (beneficial)	SMALL (adverse) to LARGE (beneficial)
Environmental Justice	No disproportionately high and adverse impacts	No disproportionately high and adverse impacts	No disproportionately high and adverse impacts
Air Quality	SMALL to MODERATE	SMALL	SMALL
Climate Change	SMALL	SMALL	SMALL
Geology and Soils	SMALL	SMALL	SMALL
Surface-Water			
Quality	SMALL	SMALL	SMALL
Consumptive Use	SMALL	SMALL	SMALL
Groundwater			
Quality	SMALL	SMALL	SMALL
Consumptive Use	SMALL	SMALL	SMALL
Terrestrial Resources	SMALL to MODERATE	SMALL	SMALL
Aquatic Ecology	SMALL	SMALL	SMALL
Special Status Species and Habitats	Impacts from the construction of the ISFSI would be determined as part of ESA Section 7 consultation. Assuming the ISFSI can be sited to avoid special status species and habitats, operation, and replacement of the ISFSI is not likely to adversely affect special status species and habitats. Impacts would be determined as part of ESA Section 7 consultation if continued storage would affect listed species or critical habitat.		
Historic and Cultural Resources	SMALL, MODERATE, or LARGE	SMALL, MODERATE, or LARGE	SMALL, MODERATE, or LARGE
Noise	SMALL	SMALL	SMALL
Aesthetics	SMALL to MODERATE	SMALL to MODERATE	SMALL to MODERATE

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Table 5-1. Summary of Environmental Impacts of Continued Away-from-Reactor Storage (cont'd)

Resource Area	Short-Term Storage	Long-Term Storage	Indefinite Storage
Waste Management			
LLW	SMALL	SMALL	SMALL
Mixed Waste	SMALL	SMALL	SMALL
Nonradioactive Waste	SMALL	SMALL	SMALL to MODERATE
Transportation			
Traffic	SMALL to MODERATE	SMALL to MODERATE	SMALL to MODERATE
Health	SMALL	SMALL	SMALL
Public and Occupational Health	SMALL	SMALL	SMALL
Accidents	SMALL	SMALL	SMALL
Sabotage or Terrorism	SMALL	SMALL	SMALL

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6.0 Cumulative Impacts

2 The Council on Environmental Quality's (CEQ's) regulations implementing the National
3 Environmental Policy Act of 1969, as amended (NEPA), define a cumulative impact as "... the
4 impact on the environment that results from the incremental impact of [an] action when added to
5 other past, present, and reasonably foreseeable future actions, regardless of what agency
6 (Federal or non-federal) or person undertakes such other actions" (Title 40 of the *Code of*
7 *Federal Regulations* 1508.7 [10 CFR 1508.7]). Cumulative impacts can result from individually
8 minor, but collectively significant, actions taking place over a period of time. It is possible that
9 an impact that may be SMALL by itself could result in a MODERATE or LARGE cumulative
10 impact when considered in combination with the impacts of other actions on the affected
11 resource. For example, if a resource is regionally declining or imperiled, even a SMALL
12 individual impact could be substantial if it contributes to or accelerates the overall resource
13 decline.

14 6.1 Methodology for Assessing Cumulative Impacts

15 The cumulative impacts assessment in this draft "Waste Confidence Generic Environmental
16 Impact Statement" (draft GEIS) examines the incremental impact of continued storage on each
17 resource area in combination with other past, present, and reasonably foreseeable actions. The
18 general approach for assessing cumulative impacts is based on principles and guidance
19 described in the CEQ's "Considering Cumulative Effects under the National Environmental
20 Policy Act" (CEQ 1997). In addition, the U.S. Nuclear Regulatory Commission (NRC) reviewed
21 the relevant portions of the U.S. Environmental Protection Agency's (EPA's) "Consideration of
22 Cumulative Impacts in EPA Review of NEPA Documents" (EPA 1999) and "The NEPA Task
23 Force Report to the Council on Environmental Quality on Modernizing NEPA Implementation"
24 (CEQ 2003). Based on the review of these documents, and NRC's regulations implementing
25 NEPA in 10 CFR Part 51, the NRC developed the following methodology for assessing
26 cumulative impacts in this draft GEIS:

- 27 1. During the scoping and consultation phases of the environmental review, the NRC identified
28 potential cumulative impact issues associated with the continued storage of spent nuclear
29 fuel (spent fuel). The NRC included other actions and issues later as they were identified.
- 30 2. The individual resources, ecosystems, and human communities identified in the affected
31 environment sections of Chapter 3 become the resource parameters analyzed in this
32 analysis. Similarly, direct and indirect impacts identified in Chapters 4 and 5 form the basis
33 for the analysis in this chapter.

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- 1 3. The spatial boundaries for this analysis are based on resource-specific criteria and defined
2 within each resource-specific analysis in Section 6.4. Each spatial boundary encompasses
3 the geographic area where the affected resources, ecosystems, and human communities
4 and the distances at which impacts associated with other past, present, and reasonably
5 foreseeable future actions may occur.
- 6 4. The temporal boundary (i.e., the timeframe) for this analysis is defined in Section 6.2. The
7 timeframe of the cumulative impacts analysis extends from the past history of impacts on
8 each resource through decommissioning of the spent fuel pool, at-reactor independent
9 spent fuel storage installation (ISFSI), and away-from-reactor ISFSI (referred to as storage
10 facilities). The temporal boundary is the same for all resource-specific analyses below
11 (Section 6.4).
- 12 5. The NRC evaluated cumulative impacts by considering the incremental impacts from
13 continued storage in combination with other past, present, and reasonably foreseeable
14 future actions. The description of the affected environment in Chapter 3 for at-reactor
15 storage facilities and Chapter 5 for away-from-reactor ISFSIs serves as the *baseline* for the
16 cumulative impacts analysis, including the effects of past actions. The *incremental impacts*
17 related to continued storage are described and characterized in Chapter 4 for at-reactor
18 storage facilities and Chapter 5 for away-from-reactor storage facilities. The NRC identified
19 *past, present, and reasonably foreseeable future actions*. These actions include projects
20 and activities that could impact resources, ecosystems, or human communities within the
21 defined spatial and temporal bounds. Section 6.3.1 describes the general national, regional,
22 and local trends and activities (general trends) that occur near at-reactor and away-from-
23 reactor storage facilities, such as urbanization or energy production. These general trends
24 are the trends in general types of activities that occur near storage facilities and the likely
25 future trends in these activities. Section 6.3.2 describes other NRC-regulated or spent fuel
26 related activities that may occur during the period of continued storage, such as
27 decommissioning of the nuclear power plant.
- 28 6. Cumulative impacts for each resource area are assessed in Section 6.4. Overlapping or
29 cumulative impacts could occur if the action or general trend affects the same resource,
30 ecosystem, or human community as those affected by the continued storage of spent fuel
31 within the defined temporal and spatial bounds. Because of the various resource
32 parameters (e.g., an ecosystem versus a human community) and the different spatial
33 boundaries (e.g., a river versus a county) for each resource area, some activities or general
34 trends affect a subset of the resource areas discussed below. The level of detail describing
35 the various cumulative impacts is commensurate with the impact significance.
- 36 7. Conclusions for resource and systems analyses in these sections use the same three-level
37 classification scheme—SMALL, MODERATE, or LARGE—that was used for the at-reactor
38 and away-from-reactor storage facility analyses, as defined in Chapter 1. For resource
39 areas in which the cumulative impact could range based on the site-specific conditions, the

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1 below analyses describes the general conditions for which a SMALL, MODERATE, or
2 LARGE impact would occur. A conclusion is provided for at-reactor and away-from-reactor
3 sites and for all three timeframes (short-term, long-term, and indefinite storage) discussed in
4 Chapters 4 and 5.

5 8. The analysis in this chapter, as in the rest of this draft GEIS, provides a generic analysis that
6 will ultimately be used to support NRC's decision regarding a request to license or relicense
7 a reactor or site-specific ISFSI. A site-specific review is required before the NRC provides a
8 license for any reactor or ISFSI. Therefore, the analysis in this chapter would be considered
9 along with the site-specific analysis for a specific license.

10 **6.2 Spatial and Temporal Bounds of the Cumulative Impacts** 11 **Assessment**

12 The spatial boundaries for the cumulative impact assessment are resource-specific and
13 identified within each resource-specific analysis below in Section 6.4. The NRC set the spatial
14 boundaries to encompass the geographic area of the affected resources and the distances at
15 which impacts associated with past, present, and reasonably foreseeable actions may occur.

16 In addition to impacts accumulating over a geographic area, impacts can also accumulate or
17 develop over time. Therefore, the cumulative impacts assessment looks across a specific
18 timeline that includes the past, present, and reasonably foreseeable future (CEQ 1997). The
19 temporal boundary for this analysis includes activities that could occur through
20 decommissioning of at-reactor or away-from-reactor storage facilities.

21 The spatial and temporal boundaries describes the maximum distance or time considered in the
22 analysis. However, even if a project falls within these overall temporal and spatial bounds, the
23 effects may not overlap in space and time with the effects of continued storage, especially for
24 projects with short-term impacts. For example, constructing a small dock along a shoreline
25 would have a temporary impacts on aquatic resources. Unless the dock was constructed during
26 the period of continued storage, the impacts would not likely overlap with potential impacts from
27 continued storage. On the other hand, construction and operation of a dam could have long-
28 term impacts that last several decades. Therefore, the impacts could be overlapping with
29 continued storage, even if dam operations ceased several years before continued storage.
30 Resource-specific analysis in Section 6.4 only describe activities that would overlap in both
31 space and time with potential impacts from continued storage.

32 **6.3 Past, Present, and Reasonably Foreseeable Actions**

33 This section describes the NRC's methodology for identifying past, present, and reasonably
34 foreseeable actions. As described in CEQ guidance (CEQ 1997), identifying reasonably

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1 foreseeable future actions is a critical component of a cumulative impacts analysis. However,
2 the CEQ also recognizes that agencies should not engage in speculation in an effort to identify
3 all actions that could contribute to overall potential cumulative effects. Given the national scope
4 of the U.S. nuclear industry and the long timeframes that are under consideration in this draft
5 GEIS as described in Chapter 1, it is not practical to consider all potential public and private
6 projects. For this reason, reasonably foreseeable future actions that will be considered in the
7 cumulative effects analysis include the following:

- 8 • general trends or activities that the NRC has previously determined to occur near at-reactor
9 and away-from-reactor storage facilities
- 10 • programmatic actions for which Federal agencies have prepared and published NEPA
11 documents
- 12 • programs and policies enabled by legislation
- 13 • NRC activities or connected actions that could occur at or beyond the storage site during
14 continued storage

15 The following sections summarize the past, present, and reasonably foreseeable actions
16 considered in this cumulative analysis, including both general trends in Section 6.3.1 and other
17 NRC-regulated or spent fuel-related activities in Section 6.3.2.

18 **6.3.1 General Trends and Activities**

19 Because of the uncertainty of specific activities that may occur over very long time periods in the
20 future, the NRC considered the general types of activities that occur near at-reactor and away-
21 from-reactor storage facilities and the likely future trends of these activities. This approach
22 follows CEQ (1997) guidance that recommends looking at the trends of various actions to
23 analyze the potential activities that could occur through the reasonably foreseeable future,
24 especially in situations with high uncertainty.

25 To determine typical activities that occur near at-reactor and away-from-reactor storage
26 facilities, the NRC reviewed the cumulative impacts evaluations in NUREG-1437, "Generic
27 Environmental Impact Statement for License Renewal of Nuclear Plants, Revision 1" (License
28 Renewal GEIS) (NRC 2013a), site-specific EISs for new and operating reactors (e.g., NRC
29 2011a-f, 2012a, 2013b), and site-specific at-reactor and away-from-reactor ISFSI
30 environmental assessments (EAs) or environmental impact statements (EISs) (e.g., NRC
31 2001a). The NRC also reviewed licensing documents for power reactors because at-reactor
32 storage facilities are located at the reactor site, and therefore, at-reactor storage facilities are
33 surrounded by the same activities as those identified in site-specific EISs for new reactors,
34 supplemental EISs for license renewal of operating reactors, and in the License Renewal GEIS
35 for operating reactors. Table 6-1 describes the types of activities that the NRC identified.

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1 The NRC also evaluated the reasonably foreseeable trend for each activity, primarily using
2 projections prepared by Federal, State, and local agencies. In some cases, the NRC
3 considered projections estimated by industry-based policy organizations, especially for activities
4 with limited Federal, State, and local oversight. Trends in activities, facilities, or processes are
5 based on projections as far into the future as reasonably foreseeable for the particular industry
6 or activity. For many activities, the available projections cover shorter time periods, on the order
7 of 25 to 40 years. The NRC qualitatively used these projections to estimate reasonable trends
8 during continued storage. While the NRC considers this a reasonable assumption based on the
9 best available data, the NRC also notes that applying the trends beyond the time period
10 specified for each activity introduces additional uncertainty. In addition, the NRC assumed that
11 local, State, and Federal authorities would continue to have oversight over the construction and
12 operation of many of the activities described in Table 6-1.

13 **Table 6-1.** General Trends and Human Activities Occurring at or near Storage Facilities

Activity or Stressor	Reasonably Foreseeable Future Trend
<i>Increased Energy Demand</i>	
Overall energy demand	Total energy use will increase by 10% from 2011 to 2040 (EIA 2012a). For at-reactor storage facilities, shutdown of the reactor will likely require replacement power, which may be built at the reactor site depending on spatial and water-use requirements, power needs, and the business plans of the operator (NRC 2013a).
Overall electricity consumption	Increased electricity consumption at an average annual rate of 0.9% (EIA 2012a).
New and continued construction and operation of gas-fired plants	About 0.8% annual increase from 2011 to 2040 (EIA 2012a).
New and continued construction and operation of coal-fired plants	About 0.1% annual increase from 2011 to 2040 (EIA 2012a).
New and continued construction and operation of nuclear plants	About 0.5% annual increase from 2011 to 2040 (EIA 2012a).
Continued operation of oil-fired plants	About 0.9% annual increase from 2011 to 2040 (EIA 2012a).
New and continued construction and operation of wind farms	About 2.8% annual increase from 2010 to 2035 (EIA 2012b).
New and continued construction and operation of conventional hydropower plants	About 0.8% annual increase from 2010 to 2035 (EIA 2012b).
New and continued construction and operation of solar plants	About 5.1% to 16.4% annual increase from 2010 to 2035 (EIA 2012b).

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Table 6-1. General Trends and Human Activities Occurring at or near Storage Facilities
(cont'd)

Activity or Stressor	Reasonably Foreseeable Future Trend
Construction and operation of transmission lines	About 29,000 additional circuit miles of high-voltage transmission capacity from 2011 to 2017 (EIA 2011).
New and continued construction and operation of pipelines	About 13,000 additional miles of natural gas pipelines and 19,000 additional miles of oil pipeline infrastructure through 2035 (INGAA 2011).
New and continued construction and operation of petroleum and liquefied natural gas facilities and terminals	Domestic production of liquefied natural gas is projected to increase from about 1.7% of the natural gas supply in 2010 to about 2.5% in 2035 (INGAA 2011; NPC 2011).
New and continued operation of oil refineries	Increase in oil refinery capacity from about 1.3 to 4.3 million barrels of oil per day from 2010 to 2030, depending on economic growth and price assumptions (EIA 2012c). Additional capacity will most likely be from expansions, updates, and modifications to existing refinery fleet, rather than construction of new facilities (NPC 2007).
New and continued oil and gas exploration and extraction activities	Domestic production of crude oil increases, mostly due to onshore production of shales and tight formations. Natural gas is expected to increase from 24% to 30% of electric power generation from 2011 to 2040 (EIA 2012a).
New and continued uranium ore exploration and extraction activities	New and continued uranium ore exploration and extraction activities expected based on the 0.5% annual increase from 2011 to 2040 for nuclear power generation.
<i>Continued Use of Radiological Materials</i>	
Construction and operation of new and existing at-reactor ISFSIs	Increase in total commercial spent fuel by about 2000 to 2400 MT/yr (NRC 2013c). About 9,500 dry storage systems would be loaded by 2050, with an additional 1,000 systems (10,500 total) loaded by 2075 (Blue Ribbon Commission 2012).
New and continued activities at hospitals and industrial facilities that produce and use radioactive materials, such as medical or industrial isotopes	Increase likely given the prevalence of nuclear medicine in current treatment technologies (112 million nuclear medicine/radiation therapy procedures annually [NRC 2000]), current demand (e.g., SHINE 2013), and increasing population and aging demographics.
Continued operation of research and test reactors	As of August 2012, 31 NRC-licensed research reactors operate in the United States of which 17 have been granted a renewed license and 13 are currently under review for license renewal (NRC 2012b). Similar levels are expected in future.
Continued operation of fuel fabrication facilities	Slight decrease based on an estimate of 15.4 million separative work units in 2015 to 14.2 million separative work units in 2025 (EIA 2012d).

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Table 6-1. General Trends and Human Activities Occurring at or near Storage Facilities
(cont'd)

Activity or Stressor	Reasonably Foreseeable Future Trend
<i>Increased Water Demand</i>	
Continued transfer of water within and across water basins	Increase likely to establish reliable water supplies to support population growth (e.g., Texas Water Development Board 2012).
New and continued operation of drinking water-treatment plants and water-supply facilities	Total withdrawals of water for consumption to increase by about 50% from 2010 to 2040 (USACE 2006).
<i>Population Growth and Demographic Shifts</i>	
Overall Population Growth (in the U.S.)	Total U.S. population expected to increase from 321 million (2015) to 420 million (2060) (USCB 2012).
<i>Increased Urbanization</i>	
River, shoreline, canal, or channel modifications including dredging and erosion-prevention programs	Activities expected to continue based on statutory authority for U.S. Army Corps of Engineers (USACE), population growth, and urbanization.
Construction of housing units	An increase in total housing units is expected from 105.2 million units in 2010, to 143 to 153 million units in 2030, to 153 to 192 million units in 2050 (Pitkin and Myers 2008).
Construction of commercial buildings	Similar to housing construction, commercial construction would be expected to increase with population growth and continued urbanization.
Waterfront development	Coastal populations likely to increase, particularly in warmer coastal regions in the south based on population growth and housing trends.
<i>Transportation</i>	
Construction of transportation infrastructure (e.g., roads, bridges, and rail)	Additional infrastructure likely based on population growth. In addition, increased reliance on mass transit would reduce the need for new long-distance highway infrastructure (National Research Council 2009).
<i>Other Activities and Stressors</i>	
Continued agricultural activities, aquaculture activities, and commercial fishing	Agricultural and aquaculture production and commercial fishing would likely increase to provide food for an increasing national population (USDA 2012).
Continued industrial and manufacturing activities	Industrial and manufacturing activities (e.g., mines, quarries, glass manufacturing, chemical facilities—including organic chemical, inorganic chemical, and other miscellaneous chemical product and preparation manufacturing) would be anticipated to increase to provide goods and services for an increasing national population.

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Table 6-1. General Trends and Human Activities Occurring at or near Storage Facilities
(cont'd)

Activity or Stressor	Reasonably Foreseeable Future Trend
Continued resource management at State and Federal parks, preserves, wildlife management areas, national wildlife refuges, and recreational areas, or other private or public efforts to restore, preserve, or enhance natural communities	Government land management agencies will continue to operate and manage Federal and State properties in accordance with their statutory authority. Legislation in Congress or in State legislatures may revise (either expand or reduce) agency authority (e.g., NPSCC 2009).
Continued operation and closure of various military facilities	Military facilities will continue to support combat readiness and national security, but projections indicate that future overall military budgets will be reduced, accompanied by a reduction in active-duty strength (76 FR 4134).
Climate change	Increased temperature, sea-level rise, decreased precipitation in the southern states and increased precipitation in northern tier states, and other changes in climate as described in the U.S. Global Climate Research Project (GCRP) (2009) and the Intergovernmental Panel on Climate Change (2007). Depending on the assumed scenario, global temperatures in 2100 are predicted to increase by 1°C (most aggressive carbon emissions control) to 6.5°C (least aggressive carbon emissions control). Sea level is predicted to increase from 0.5 to 1.2 m by 2100. Reduced snowpack in western mountains is predicted (USAC 2007).

1 **6.3.2 Other NRC-Regulated or Spent Fuel-Related Activities during Continued**
2 **Storage**

3 In addition to the incremental impacts from continued storage described in Chapters 4 and 5,
4 other NRC-regulated or spent fuel-related activities could affect the same resources as those
5 affected by continued storage. These activities include other NRC-regulated actions that would
6 occur at the storage site or connected actions that could occur at or beyond the storage site. A
7 summary of these activities considered in this cumulative analysis is provided below. Note that
8 some of the activities apply only to a subset of the timeframes described in Chapters 4 and 5.
9 For example, dry transfer system (DTS) construction and decommissioning would occur only
10 during long-term storage or indefinite storage, but would not occur during short-term storage.

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1 **6.3.2.1 Final Reactor Shutdown Activities Prior to Decommissioning**

2 These activities could involve an initial increase in staff to execute shutdown, a decrease and
3 ultimately; a cessation of reactor power output to grid; an increase in power demand to support
4 onsite activities; a decrease in demand for power plant operational cooling; and the potential for
5 removal of some structures and equipment.

6 Also see the description of shutdown activities in Section 2.2.

7 **6.3.2.2 Decommissioning of the Reactor Power Block (including the spent fuel pool),**
8 **DTS, and ISFSI**

9 Decommissioning includes activities to remove radioactive materials from structures, systems,
10 and components to demonstrate compliance with NRC release limits in 10 CFR Part 20,
11 Subpart E. Reactor decommissioning of facilities not related to spent fuel storage could occur
12 from the time that the licensee certifies that it has permanently ceased power operations until
13 the license is terminated. To facilitate decommissioning at some sites, the operator may
14 construct a new spent fuel pool cooling system to allow spent fuel pool to be isolated from other
15 reactor plant systems.

16 Decommissioning of the spent fuel pool could begin after stored spent fuel has been transferred
17 to dry storage. The NRC generically evaluated the environmental impacts from reactor
18 decommissioning including the spent fuel pool (but not ISFSIs) in NUREG-0586, "Final Generic
19 Environmental Impact Statement on Decommissioning of Nuclear Facilities, Supplement 1"
20 (Decommissioning GEIS) (NRC 2002). The NRC previously evaluated the environmental
21 impacts of decommissioning an away-from-reactor ISFSI in NUREG-1714, "Final
22 Environmental Impact Statement for the Construction and Operation of an Independent Spent
23 Fuel Storage Installation on the Reservation of the Skull Valley Band of Goshute Indians and
24 the Related Transportation Facility in Tooele County, Utah" (PFSF EIS) (NRC 2001a) and in
25 site-specific at-reactor ISFSIs in the Calvert Cliffs, Humboldt Bay, H.B. Robinson, Surry,
26 Oconee, and Diablo Canyon EAs (NRC 2001a, 2003a, 2005a-c, 2009, 2012b).
27 Decommissioning of the DTS is only applicable for long-term and indefinite storage. Also see
28 the description of decommissioning activities in Section 2.2.

29 **6.3.2.3 Activities to Prepare the Spent Fuel for Transportation to a Repository for Final**
30 **Disposal**

31 These activities would include transferring spent fuel that was stored in dual-purpose canisters
32 from the storage casks to transportation casks and then loading the transportation casks on
33 conveyances before transportation to a repository. Spent fuel stored in storage-only casks or
34 that would otherwise require bare fuel handling (as described in Chapter 2) would be transferred
35 to transportation-certified casks using the spent fuel pool for short-term storage and the DTS

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1 long-term storage timeframe. These transportation-related activities could begin when a
2 repository begins accepting shipments of spent fuel from power reactors. This activity would
3 only occur for short-term and long-term storage, because indefinite storage assumes that a
4 repository is never built.

5 **6.3.2.4 Transportation of Spent Fuel from an At-Reactor or Away-From-Reactor** 6 **Storage Facility to a Repository for Disposal**

7 As described in Section 1.1, the Federal government has adopted deep geologic disposal as
8 the national solution for spent fuel disposal (Nuclear Waste Policy Act of 1982) and the
9 U.S. Department of Energy (DOE) has reaffirmed the Federal government's commitment to the
10 ultimate disposal of spent fuel (DOE 2013). When a repository is available to accept shipments
11 of spent fuel, facility operators would ship spent fuel in NRC-approved transportation casks from
12 facility locations across the United States to a repository site. Shipments would be required to
13 comply with applicable NRC and U.S. Department of Transportation regulations for the
14 transportation of radioactive materials in 10 CFR Part 71 and 49 CFR Parts 171 through 180.
15 Transportation of spent fuel to a repository would only occur during short-term and long-term
16 storage because indefinite storage assumes a repository is never built.

17 **6.4 Resource-Specific Analyses**

18 **6.4.1 Land Use**

19 This section evaluates the effects of continued storage on land use when added to the
20 aggregate effects of other past, present, and reasonably foreseeable future actions. As
21 described in Sections 4.1 and 5.1, the incremental impacts from continued storage on land use
22 would be SMALL for all timeframes at both at-reactor and away-from-reactor storage facilities.

23 The geographic area considered in the cumulative land use analysis includes all affected land
24 surrounding the at-reactor and away-from-reactor storage facilities. Residential, commercial,
25 industrial, agricultural, forested, and recreational lands typically surround spent fuel storage
26 facilities. Depending on the site, the land surrounding a spent fuel storage facility could include
27 private and public lands in a range of political jurisdictions including towns, townships, service
28 districts, counties, and parishes. In addition, State, Federal, and Native American lands are
29 present within the area considered for this analysis.

30 **6.4.1.1 Potential Cumulative Impacts from General Trends and Activities**

31 Cumulative impacts on land use include (1) changing and disturbing existing land-use
32 conditions, (2) restricting access or establishing right-of-way access, (3) restricting agricultural
33 or recreational activities; and (4) altering ecological or historic and cultural resources (e.g., NRC
34 2011a–f, 2012a, 2013a,b). Cumulative impacts could occur from the activities described in

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1 Section 6.3.1, such as constructing and operating new and existing energy projects and
2 infrastructure (e.g., replacement power), water development projects, and constructing housing
3 units, commercial buildings, roads, bridges, and rail lines (e.g., NRC 2011a–f, 2012a, 2013a,b).
4 In addition, climate change can impact agricultural and ranching land uses because of reduced
5 crop yields and livestock productivity (GCRP 2009). Climate change can also lead to higher sea
6 levels (GCRP 2009), thereby changing land use through inundation and loss of coastal wetlands
7 and other low-lying areas.

8 The magnitude of cumulative land-use impacts resulting from general trends taking place near a
9 storage facility would depend on current land-use patterns and proposed land-use changes, the
10 number (and density) of actions, and the extent to which these actions (facilities or projects)
11 employ mitigation measures to reduce impacts. The cumulative impacts from general trends
12 and activities would range from minimal (e.g., minor changes in land use from limited
13 development in the area, see NRC 2011d) to noticeable (e.g., construction and operation of a
14 new coal-fired power plant, new transmission lines, and climate change in the area, see NRC
15 2011a). Growth control measures, such as zoning restrictions and implementation of local land
16 use or master plans, are expected to limit development near a storage facility. Therefore, the
17 cumulative impacts are not expected to be destabilizing (e.g., major changes in land use from
18 uncontrolled development in the area).

19 **6.4.1.2 Potential Cumulative Impacts from Other NRC-Regulated or Spent Fuel-Related** 20 **Activities**

21 Cumulative impacts on land-use conditions could result from other NRC-regulated or spent fuel-
22 related activities, such as decommissioning of the reactor power block (including the spent fuel
23 pool), ISFSIs, and DTS.

24 Activities associated with decommissioning of the reactor power block (including the spent fuel
25 pool) that could impact land use include (1) addition and expansion of staging and laydown
26 areas for equipment, (2) construction of temporary buildings and parking areas, (3) removal of
27 large reactor components, (4) structure dismantlement, and (5) low-level waste (LLW) storage
28 and packaging (NRC 2002). To facilitate decommissioning at some sites, the operator may
29 construct a new spent fuel pool cooling system to allow the spent fuel pool to be isolated from
30 other reactor plant systems in order. In the Decommissioning GEIS for power reactors, the
31 NRC (2002) determined that changes to land use from these activities would be temporary and
32 would not be detectable. Most reactor sites have sufficient area within the previously disturbed
33 area (whether during construction or operation of the site); therefore, no additional land
34 disturbance would be anticipated. The impacts from decommissioning spent fuel pools were
35 considered in the Decommissioning GEIS. Given that the impacts from decommissioning
36 reactors and spent fuel pools would be similar to that described in the Decommissioning GEIS
37 for reactors, impacts on onsite land use during decommissioning are expected to be minimal.

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1 Activities associated with decommissioning ISFSIs that could impact land use include
2 (1) decontaminating the concrete storage casks; (2) dismantling and removing the concrete
3 storage casks, concrete pads, and support facilities, including the DTS; and (3) removing any
4 contaminated soil identified during the final radiological site survey. In most cases, land
5 disturbance impacts associated with decommissioning ISFSIs would be similar to or less than
6 land disturbance impacts associated with constructing ISFSIs (NRC 2003a, 2005a–c, 2009,
7 2012b). After decommissioning activities are complete, the area previously occupied by the
8 at-reactor or away-from-reactor ISFSI would typically be covered with topsoil, contoured, and
9 replanted with native vegetation (NRC 2005c). The goal of decommissioning is to release the
10 site for unrestricted use. Because the land disturbance impacts from decommissioning
11 at-reactor and away-from-reactor ISFSIs would be similar to or less than those associated with
12 constructing ISFSIs, impacts on land use during decommissioning are expected to be minimal.

13 **6.4.1.3 Conclusion**

14 Cumulative impacts on land use include the incremental effects from continued storage when
15 added to the aggregate effects of other past, present, and reasonably foreseeable future
16 actions. As described in Sections 4.1 and 5.1, the incremental impacts from continued storage
17 on land use is SMALL for all timeframes at both at-reactor and away-from-reactor storage
18 facilities. In addition, past, present, and reasonably foreseeable activities take place in the
19 geographic area of interest that could contribute to cumulative effects to land use. The
20 cumulative impacts on land use from continued storage when added to other past, present, and
21 reasonably foreseeable Federal and non-federal activities are SMALL to MODERATE
22 depending on land-use patterns and activities surrounding the site. A SMALL impact would
23 occur if no other actions occur that have overlapping, noticeable effects on land use. A
24 MODERATE impact would occur if NRC or other Federal or non-federal actions, such as
25 construction and operation of other nearby nuclear, coal-fired, or gas-fired power plants or
26 future urbanization, have overlapping impacts with the continued storage of waste that
27 noticeably altered land use. At storage facilities where the cumulative impacts would be
28 MODERATE from other Federal or non-federal activities, the NRC determined the cumulative
29 impacts would likely remain MODERATE whether or not continued storage occurred because
30 the incremental impacts from continued storage would be minor, especially in comparison to
31 other general trends, such as urbanization.

32 **6.4.2 Socioeconomics**

33 This section evaluates the socioeconomic effects of continued storage when added to the
34 aggregate effects of other past, present, and reasonably foreseeable future actions. As
35 described in Sections 4.2 and 5.2, the adverse effects of continued storage are SMALL for all
36 at-reactor and away-from-reactor spent fuel storage facilities because of the small number of
37 workers required to maintain and monitor the storage of spent fuel. In addition, there could also

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1 be LARGE beneficial impacts on the local economy and SMALL impacts elsewhere as the result
2 of construction and operation of an away-from-reactor storage facility.

3 The geographic area considered in the cumulative socioeconomic resources analysis is the
4 socioeconomic region of influence, which includes the areas where spent fuel storage workers
5 and their families reside, spend their income, and use their benefits. Thus, in these areas,
6 workers affect both directly and indirectly the economic conditions of the region.

7 **6.4.2.1 Potential Cumulative Impacts from General Trends and Activities**

8 Cumulative socioeconomic impacts in local communities could affect (1) employment and
9 income, (2) tax revenues, (3) population and housing demand, and (4) the availability and
10 demand for public services (NRC 2008, 2011d, 2012a, 2013a). New industries, such as energy
11 projects (e.g., replacement power); industrial, commercial, and agricultural development; and
12 regional tourism and recreation, could cause an increase in population, demand for housing and
13 services, traffic volume, and tax revenue paid to local jurisdictions. In addition, an at-reactor
14 ISFSI located at or near an operating reactor would experience cumulative impacts associated
15 with reactor operations, such as traffic and tax revenue paid to local jurisdictions.

16 The magnitude of the socioeconomic impact resulting from general trends within close proximity
17 of a spent fuel storage facility would depend on the intensity of development. Cumulative
18 impacts would be specific to the region in which the storage facility is located and would range
19 from minimal (e.g., minor increase in demand for public services caused by construction and
20 operation of a new power plant, see NRC 2011d) to noticeable (e.g., noticeable increase in
21 housing and rental prices because of increased demand caused by the construction and
22 operation of a new power plant, see NRC 2008). In some situations, the cumulative impacts
23 could be substantially beneficial (e.g., increase in property tax revenue paid to the local area
24 resulting from operation of new power plant, see NRC 2012a).

25 **6.4.2.2 Potential Cumulative Impacts from Other NRC-Regulated or Spent Fuel-Related** 26 **Activities**

27 Cumulative impacts could result from other NRC-regulated or spent fuel-related activities, such
28 as decommissioning the power block (including the spent fuel pool), ISFSI, and DTS. The
29 extent to which impacts would be cumulative would depend on the timing of decommissioning in
30 relation to other activities (e.g., plant shutdown).

31 The immediate socioeconomic impact caused by terminating reactor operations and power plant
32 shutdown would be greater than the impact from decommissioning the power block. The
33 socioeconomic impacts from terminating reactor operations and power plant shutdown are
34 described in both the Decommissioning GEIS (NRC 2002) and the License Renewal GEIS
35 (NRC 2013a), as described below.

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1 As discussed in Section 3.2, the size of the nuclear power plant operations workforce varies
2 considerably among operating U.S. nuclear power facilities and ranges from 600 to
3 2,400 workers. Operating nuclear power plants generally provide a significant amount of tax
4 revenue to local communities and public school districts. Impacts associated with power plant
5 shutdown include the loss of jobs at the nuclear plant and in surrounding communities; and a
6 corresponding reduction in tax payments, demand for housing and public services, and traffic
7 volume. As stated in Section 3.2, property tax payments would continue as long as spent fuel is
8 stored onsite. Publicly owned tax-exempt nuclear power plants, fully depreciated plants, or
9 plants located in urban or an urbanizing area with a large or growing tax base would not
10 experience many changes in overall socioeconomic conditions (NRC 2002). In rare
11 circumstances in which a large nuclear power plant located in a rural area permanently ceases
12 operations early and delays decommissioning, the affected area could experience greater
13 impacts (NRC 2002). Impacts from the loss or reduction of tax revenue because of the
14 termination of reactor operations and power plant shutdown on community services could range
15 from SMALL to LARGE (NRC 2013a). Considering all variables, such as plant size and
16 community size as equivalent, plants that begin decommissioning immediately would have
17 less immediate negative impacts because the workforce reduction would occur gradually
18 (NRC 2002).

19 Impacts associated with decommissioning a power block (including the spent fuel pool) were
20 described in the Decommissioning GEIS (NRC 2002). While there would be an overall
21 reduction in the number of workers at the nuclear plant during decommissioning, the size of the
22 workforce would have already been substantially reduced after the termination of reactor
23 operations and power plant shutdown. The Decommissioning GEIS estimated that between
24 100 and 200 workers would be needed to support decommissioning (NRC 2002). The
25 socioeconomic impact from decommissioning the power block and spent fuel pool would
26 depend on the size and location of the facility and would eventually result in the loss of jobs
27 upon completion, including reduced housing demand, tax revenues, and demand for public
28 services. However, the NRC concluded that the overall socioeconomic impact from
29 decommissioning the power block would be SMALL (NRC 2002).

30 Because of the smaller workforce involved, the socioeconomic impact from decommissioning
31 any ISFSI and associated DTS would be less than experienced from the decommissioning the
32 power block. Decommissioning activities would commence after spent fuel has been
33 transported offsite to either a repository or away-from-reactor storage facility. Funding plans for
34 decommissioning ISFSIs (MYAPC 2013; CYAPC 2012; YAEC 2012) estimate that
35 approximately 50 workers would be needed to decommission an at-reactor storage facility over
36 a 1- to 1.5-year period. Decommissioning the DTS could occur in parallel with decommissioning
37 the at-reactor ISFSI and would represent a minor increase to the workforce. Based on DOE's
38 Topical Safety Analysis Report (DOE 1996), it was estimated that a 5-person workforce could
39 decommission the DTS within 60 days. Workforce numbers and duration of decommissioning

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1 activities would vary from site to site. A review of NRC EAs and EISs for construction,
2 operation, and renewal of site specifically licensed at-reactor and away-from-reactor ISFSIs
3 (NRC 2001a, 2003a, 2005a–c, 2009, 2012b) did not identify any significant socioeconomic
4 impacts during decommissioning of ISFSIs. The magnitude of impacts from decommissioning
5 an ISFSI at other sites would be similar to that described in the Calvert Cliffs, Humboldt Bay,
6 H.B. Robinson, Surry, Oconee, and Diablo Canyon EAs and the PFSF EIS because of
7 considerations of workforce, housing demand, traffic networks, and public services. Because
8 the impacts from decommissioning at-reactor and away-from reactor ISFSIs would be similar to
9 that described in site-specific ISFSI EAs and the PFSF EIS, socioeconomic impacts during
10 decommissioning are expected to be minimal.

11 **6.4.2.3 Conclusion**

12 Cumulative impacts include the incremental effects from continued storage when added to the
13 aggregate effects of other past, present, and reasonably foreseeable future actions. As
14 described in Sections 4.2 and 5.2, the adverse effects of continued storage are SMALL for
15 at-reactor and away-from-reactor storage facilities because of the small number of workers
16 required to maintain and monitor the storage of spent fuel. However, there could also be
17 LARGE beneficial impacts on the local economy and SMALL impacts elsewhere as a result of
18 construction and operation of an away-from-reactor storage facility. In addition, past, present,
19 and reasonably foreseeable activities take place in the geographic area of interest that could
20 contribute to cumulative socioeconomic impacts. The cumulative socioeconomic impacts from
21 continued storage when added to other past, present, and reasonably foreseeable Federal and
22 non-federal activities, such as the termination of reactor operations, decommissioning,
23 construction of replacement power energy projects, urbanization, and transportation projects,
24 are SMALL to LARGE depending on the activity and location of the action relative to the local
25 community. A SMALL impact would occur if there are no other actions that have overlapping,
26 noticeable socioeconomic effects. A MODERATE impact would occur if other Federal or non-
27 federal actions, such as construction and operation of a new power plant, have overlapping
28 impacts with the continued storage of waste that would noticeably alter socioeconomic
29 conditions (e.g., increased tax revenue). LARGE impacts would be unlikely because local
30 planning and zoning authorities would ensure that new projects do not destabilize
31 socioeconomic attributes in the local area. At storage facilities for which the adverse cumulative
32 impacts would range from MODERATE to LARGE because of other Federal and non-federal
33 activities, ~~the~~ the adverse cumulative impacts would be MODERATE to LARGE whether or not
34 continued storage occurred because the incremental impacts from continued storage would be
35 minor, especially in comparison to other general trends, such as urbanization or construction
36 and operation of new power plants.

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1 **6.4.3 Environmental Justice**

2 This section describes the impacts on minority and low-income populations resulting from
3 continued storage when added to the aggregate effects of other past, present, and reasonably
4 foreseeable future actions. As described in Sections 4.3 and 5.3, minority and low-income
5 populations are not expected to experience disproportionately high and adverse human health
6 and environmental effects from the incremental impacts associated with continued storage.

7 The environmental justice cumulative impact analysis assesses the potential for minority and
8 low-income populations to experience disproportionately high and adverse human health and
9 environmental effects from the continued storage of spent fuel combined with past, present, and
10 reasonably foreseeable future actions. Adverse health effects are measured in terms of the risk
11 and rate of fatal or nonfatal adverse impacts on human health. An adverse environmental
12 impact is an impact that is determined to be both harmful and significant (as employed by
13 NEPA).

14 Disproportionately high and adverse human health effects occur when the risk or rate of
15 exposure to an environmental hazard for a minority or low-income population is significant and
16 exceeds the risk or exposure rate for the general population or for another appropriate
17 comparison group. Disproportionately high environmental effects refer to impacts, or risk of
18 impacts, on the natural or physical environment in a minority or low-income community that are
19 significant and appreciably exceeds the environmental impact on the larger community. Such
20 effects may include biological, cultural, economic, or social impacts (NRC 2013a).

21 Additionally, the cumulative impact assessment considers the potential radiological risk to
22 minority and low-income population groups residing within the 80 km (50 mi) region from the
23 spent fuel storage facility as well as the potential exposure from other sources of radiation from
24 other actions. As stated in Section 3.3, special population groups include populations that rely
25 principally on fish or wildlife for subsistence.

26 **6.4.3.1 Potential Cumulative Impacts from General Trends and Activities**

27 Potentially adverse human health and environmental effects from activities associated with
28 industrial, commercial, agricultural, and transportation developments can affect the resources
29 on which minority and low-income populations depend (e.g., fish, game animals, and native
30 vegetation) (NRC 2013a). For example, potential impacts on minority and low-income
31 populations from the construction and operation of replacement power and other industrial
32 projects in the vicinity of storage facilities would mostly consist of environmental (e.g., noise,
33 dust, and traffic) and socioeconomic (e.g., employment and housing) effects during
34 construction. Noise and dust impacts during construction would be short term and primarily
35 limited to onsite activities. Minority and low-income populations residing along site access
36 roads could be directly affected by increased commuter vehicle and truck traffic. However,

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1 these effects could be limited to certain hours of the day. Increased demand for rental housing
2 during construction could cause rental costs to temporarily rise, disproportionately affecting low-
3 income populations living near the site that rely on inexpensive housing. However, given the
4 proximity of most industrial sites to urban areas, many workers could commute to the
5 construction site, thereby reducing the need for rental housing.

6 The magnitude of human health and environmental effects resulting from all actions associated
7 with general trends on minority and low-income populations living within close proximity of a
8 spent fuel storage facility would depend on the intensity of the effects. Some of these potential
9 effects have been identified in resource areas presented in Chapters 4 and 5 of this draft GEIS.
10 Minority and low-income populations are subsets of the general population residing in the area
11 and all would be exposed to the same hazards generated from activities associated with
12 continued storage.

13 **6.4.3.2 Potential Cumulative Impacts from Other NRC-Regulated or Spent Fuel-Related** 14 **Activities**

15 Cumulative impacts could result from other NRC-regulated or spent fuel-related activities, such
16 as terminating reactor operations, shutting down the power plant ~~and~~, decommissioning the
17 reactor power block (including the spent fuel pool) and ISFSIs, ~~and constructing and operating~~
18 ~~the and~~ DTS. The NRC also considers the potential for minority and low-income populations to
19 experience disproportionately high and adverse human health effects and (1) whether the health
20 effects would be significant, at or above generally accepted norms; (2) whether the risk or rate
21 of environmental hazard exposure would be significant, exceed, or likely exceed the risk or rate
22 to an appropriate comparison group (e.g., the general population); and (3) whether health
23 effects would occur in a minority or low-income population already affected by cumulative or
24 multiple adverse exposures from environmental hazards (NRC 2002).

25 The impacts associated with plant shutdown are described in both the Decommissioning GEIS
26 (NRC 2002) and the License Renewal GEIS (NRC 2013a). Plant shutdown and the resulting
27 loss of jobs, income, and tax revenue could have a disproportionate effect on minority and low-
28 income populations (NRC 2013a). The loss of tax revenue, for example, could reduce the
29 availability or eliminate some of the community services on which low-income and minority
30 populations may depend (NRC 2013a).

31 Environmental impacts associated with decommissioning activities at a nuclear power plant site
32 and the extent to which minority and low-income populations could be affected are discussed in
33 the Decommissioning GEIS (NRC 2002). Decommissioning the power block and spent fuel
34 pool would eventually result in the loss of jobs upon completion. Other impacts would include
35 reduced housing demand, tax revenues, and the availability and demand for public services
36 (NRC 2002). Decommissioning activities could affect air and water quality in the area around
37 each nuclear plant site, which could cause health and other environmental impacts in minority

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1 and low-income populations that might be present in the area (NRC 2002). Population groups
2 with particular resource dependencies or practices (e.g., subsistence agriculture, hunting, and
3 fishing) could also be disproportionately affected (NRC 2002). The Decommissioning GEIS
4 concluded that disproportionately high and adverse impacts and associated significance would
5 be based on site-specific environmental reviews because prior to the start of decommissioning
6 activities, a final decommissioning plan must be submitted to the NRC for review and approval.
7 NRC authorization of a final decommissioning plan would constitute a federal action under
8 NEPA and environmental resources (e.g., geology and soils, environmental justice,
9 socioeconomics, and ecology) would be analyzed on a site-specific basis (NRC 2002).

10 Because a smaller workforce would be needed, impacts from decommissioning an at-reactor
11 ISFSI are anticipated to be less than impacts resulting from decommissioning the reactor power
12 block. As discussed in Section 6.4.2, approximately 50 workers would be needed to
13 decommission an at-reactor ISFSI over a 1- to 1.5-year period. Decommissioning of the DTS
14 could occur in parallel and would represent a minor increase to the workforce. Workforce
15 numbers and duration of decommissioning activities would vary from site to site. For away-
16 from-reactor ISFSIs, the impacts of decommissioning would be similar to those associated with
17 decommissioning the power block because the number of workers required to decommission
18 both facilities are similar (NRC 2001b, 2002).

19 **6.4.3.3 Conclusion**

20 Cumulative impacts on minority and low-income populations include the incremental effects
21 from continued storage when added to the aggregate effects of other past, present, and
22 reasonably foreseeable future actions. As discussed in Section 4.3 and 5.3 of this draft GEIS,
23 minority and low-income populations are not expected to experience disproportionately high and
24 adverse effects from the incremental impacts associated with the continued storage of spent
25 fuel. In addition, the NRC determined that no disproportionately high and adverse human health
26 effects are expected in special pathway receptor populations in the region as a result of
27 subsistence consumption of water, local food, fish, and wildlife. Similarly, there would be no
28 contributory effects to human health beyond what is currently being experienced for the duration
29 that spent fuel remains onsite. Potential effects occurring from other reasonably foreseeable
30 offsite projects would be considered during NRC site-specific licensing reviews (e.g.,
31 construction of an away-from-reactor ISFSI, replacement of ISFSI and construction, operation,
32 and replacement of a DTS). In addition, as indicated in the NRC policy statement, the potential
33 for environmental justice impacts would be considered during the environmental reviews for
34 specific NRC licensing actions associated with each particular storage facility (69 FR 52040).

35 **6.4.4 Air Quality**

36 This section evaluates the effects of continued storage on air quality resources when added to
37 the aggregate effects of other past, present, and reasonably foreseeable future actions. As

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1 described in Sections 4.4 and 5.4, the incremental impacts from continued storage on air quality
2 is SMALL for all timeframes at both at-reactor and away-from-reactor storage facilities, except
3 during short-term storage at away-from-reactor ISFSIs where the impacts would range from
4 SMALL to MODERATE because construction of a rail spur could result in noticeable impacts on
5 air quality.

6 The geographic area considered in the cumulative air quality analysis includes the air quality
7 control region in which an at-reactor or away-from-reactor storage facility is located. This area
8 could include one or more counties that comprise the air quality control region surrounding the
9 site, as described in Section 3.4.

10 **6.4.4.1 Potential Cumulative Impacts from General Trends and Activities**

11 Cumulative impacts on air quality could include degradation of air quality in air quality control
12 regions that are already in or near nonattainment or maintenance for one or more national
13 ambient air quality standards. For at-reactor and away-from-reactor storage facilities,
14 cumulative impacts could occur due to multiple activities that affect the air quality control region
15 near the storage facility (e.g., electric power generation; ground, water, and air transportation;
16 and nearby heavy industries) associated with urbanization and industrial, commercial,
17 agricultural, and transportation development (e.g., NRC 2011a–f, 2012a, 2013a,b). In addition,
18 climate change can impact air quality because of higher or lower ambient air temperatures and
19 changes in precipitation rates (GCRP 2009). For air resources near at-reactor storage facilities,
20 additional cumulative impacts may include the following: (1) cumulative impacts due to the
21 various impacts from an individual power plant over time (e.g., employee vehicles and
22 emergency diesel generator testing) and (2) cumulative impacts due to closely sited power
23 plants (e.g., air pollutant emissions from nearby coal-fired power plants) (NRC 2013a).

24 The magnitude of cumulative impacts resulting from all general trends within the air quality
25 control region in which a storage facility is located would depend on the nature and location of
26 the actions, the number (and density) of actions, and the extent to which these actions (facilities
27 or projects) employ mitigation measures to minimize such impacts. The cumulative impacts
28 from general trends and activities would range from minimal (e.g., minor air emissions
29 associated with localized development in the area, see NRC 2011f) to noticeable (e.g.,
30 emissions from the construction and operation of a nearby coal-fired plant, see NRC 2011a).

31 **6.4.4.2 Potential Cumulative Impacts from Other NRC-Regulated or Spent Fuel-Related** 32 **Activities**

33 Cumulative impacts on air quality resources could result from other NRC-regulated or spent
34 fuel-related activities, such as (1) decommissioning of the reactor power block (including the
35 spent fuel pool), ISFSIs, and DTS₇; (2) loading of casks for transportation to a repository₇; and
36 (3) long-range transport of spent fuel to a repository.

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1 Reactor power block decommissioning activities involve the use of large diesel-powered
2 equipment for equipment removal, demolition of structures, worker transportation to and from
3 the site, and transportation of demolition debris to waste disposal facilities. In most cases, air
4 quality effects would be relatively minor and short term in duration. Air quality control measures,
5 which may be required to comply with air quality permits, would also minimize air quality
6 impacts. The Decommissioning GEIS (NRC 2002) analyzed the air quality impacts for
7 decommissioning a reactor, including the spent fuel pools. In the Decommissioning GEIS for
8 power reactors (including spent fuel pools), the NRC determined that there would be minimal
9 impact on air quality and concluded that the impacts of decommissioning on air quality are not
10 detectable (NRC 2002). The NRC's EAs for the Calvert Cliffs and Diablo Canyon at-reactor
11 ISFSIs, and the PFSF away-from-reactor ISFSI EIS did not identify any significant impacts on
12 air quality resources during decommissioning of the ISFSI (NRC 2001a, 2003a, 2012a). The
13 NRC assumes that the types and magnitude of impacts described in the Calvert Cliffs and
14 Diablo Canyon EAs and the PFSF EIS are representative of impacts from decommissioning an
15 at-reactor or away-from-reactor ISFSI at other sites because these facilities are typical sizes of
16 at-reactor and away-from-reactor ISFSIs and used typical decommissioning methods. Given
17 that the impacts from decommissioning reactors, spent fuel pools, and ISFSIs would be similar
18 to that described in the Decommissioning GEIS for reactors and site-specific ISFSI EAs and the
19 PFSF EIS, impacts on air quality resources from decommissioning ~~is~~ are expected to be
20 minimal.

21 Because the same transporters, trucks, and other fossil-fuel-powered equipment are used to
22 transfer dual-purpose canisters from transportation casks to storage casks as are used to
23 transfer them from storage casks to transportation casks, the loading of casks for transportation
24 to a repository would have similar air emission sources, levels, and impact magnitude as the
25 receiving of spent fuel at an away-from-reactor facility from at-reactor locations. As described in
26 Section 5.4.1, the NRC concluded that the operation of an away-from-reactor ISFSI, including
27 the activity of loading casks, would be SMALL. Therefore the impact magnitude for the loading
28 of casks for transportation to a repository would be similar.

29 Disposal of spent fuel requires the long-range transportation from the storage site to a
30 repository. The at-reactor storage operation examines the impacts of a facility with a
31 1,600-MTU capacity whereas the away-from-reactor operation examines the impacts of a facility
32 with a 40,000-MTU capacity. The "Final Supplemental Environmental Impact Statement for a
33 Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste
34 at Yucca Mountain, Nye County, Nevada" (Yucca Mountain EIS) (DOE 2008) assesses the air
35 quality impacts for the transportation of 70,000 MTU of spent fuel within Nevada. The
36 Yucca Mountain EIS concluded that the emissions from spent fuel transportation during
37 operations would be distributed over the entire length of the route, and no air quality standards
38 would be exceeded. Because the amount of spent fuel considered in the transportation
39 analyses in this draft GEIS is less than the amount considered in the Yucca Mountain analyses,

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1 the NRC concludes that the transportation of spent fuel to a repository would not be greater
2 than the impact magnitude documented in the Yucca Mountain EIS.

3 **6.4.4.3 Conclusion**

4 Cumulative impacts on air quality include the incremental effects from continued storage when
5 added to the aggregate effects of other past, present, and reasonably foreseeable future
6 actions. As described in Sections 4.4 and 5.4, the incremental impacts from continued storage
7 on air quality are SMALL for all timeframes for both at-reactor and away-from-reactor storage
8 facilities, except during short-term storage at away-from-reactor ISFSIs where the impacts
9 would range from SMALL to MODERATE. In addition, past, present, and reasonably
10 foreseeable activities take place in the geographic area of interest that could contribute to
11 cumulative effects to air quality resources. The cumulative impacts from continued storage
12 when added to other past, present, and reasonably foreseeable Federal and non-federal
13 activities, such as urbanization, energy development, or other industrial or commercial activities,
14 are SMALL to MODERATE. A SMALL impact would occur at sites where storage facilities have
15 minimal impacts on air quality and no other actions occur that had overlapping, noticeable
16 effects on air quality. A MODERATE impact would occur if other actions occur that did have
17 overlapping and noticeable effects on air quality, such as a nearby fossil-fuel-fired electricity
18 generating station. At storage facilities where the incremental impacts would be SMALL and the
19 cumulative impacts would be MODERATE from other Federal or non-federal activities, the NRC
20 determined the cumulative impacts would likely remain MODERATE whether or not continued
21 storage occurred because the incremental impacts from continued storage would be minor,
22 especially in comparison to other general trends, such as operation of fossil-fuel-fired power
23 plant.

24 **6.4.5 Climate Change**

25 As described in Sections 4.5 and 5.5, the incremental impacts from continued storage on
26 climate change, in terms of emissions of greenhouse gases (GHGs), are SMALL for all
27 timeframes at both at-reactor and away-from-reactor storage facilities. The geographic area
28 considered in the cumulative climate change analysis is worldwide.

29 **6.4.5.1 Potential Cumulative Impacts from General Trends and Activities and from** 30 **Other NRC-Regulated or Spent Fuel-Related Activities**

31 The magnitude of cumulative impacts resulting from all general trends taking place within the
32 region in which a storage facility is located must be placed in geographic context for the
33 following reasons:

- 34 • The environmental impact is global rather than local or regional.
- 35 • The effect is not particularly sensitive to location of the release point.

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- 1 • The magnitudes of individual GHG sources related to human activity, no matter how large
2 compared to other sources, are small when compared to the total mass of GHGs in the
3 atmosphere.
- 4 • The total number and variety of GHG sources is extremely large and the sources are
5 ubiquitous.

6 These points are illustrated by the following comparison of annual carbon dioxide emission rates
7 (Table 6-2).

8 **Table 6-2.** Comparison of Annual Carbon Dioxide Emission Rates

Source	MT/yr ^(a)
Global emissions from fossil-fuel combustion (2010) ^(b)	31,780,000,000
U.S. emissions from fossil-fuel combustion (2011) ^(c)	5,745,000,000
1,000-MW ^(e) nuclear power plant (including fuel cycle, 80 percent capacity factor) ^(d)	450,000
1,000-MW ^(e) nuclear power plant (during SAFSTOR) ^(d)	325
Average U.S. home ^(e)	12
Average U.S. passenger vehicle ^(e)	5

Source: (EPA 2012b); expressed in metric tons per year of carbon dioxide.

(a) Nuclear power emissions estimates are in units of metric tons of carbon dioxide-equivalent whereas the other energy alternatives emissions estimates are in units of metric tons of carbon dioxide. If nuclear power emissions were represented in metric tons of carbon dioxide, the value would be slightly less, as other GHG emissions would not be included.

(b) Source: (EPA 2012a), Chapter 3; expressed in metric tons per year of carbon dioxide.

(c) Source: (EPA 2012a), Table 3-1; expressed in metric tons per year of carbon dioxide.

(d) Source: (NRC 2011i); expressed in metric tons per year of carbon dioxide-equivalent.

(e) (EPA 2012b); expressed in metric tons per year of CO₂

9 Evaluation of cumulative impacts of GHG emissions requires the use of a global climate model.
10 The GCRP report (GCRP 2009) provides a synthesis of the results of numerous climate
11 modeling studies. The NRC concludes that the cumulative impacts of GHG emissions around
12 the world as presented in the report are the appropriate basis for its evaluation of cumulative
13 impacts. Based primarily on the scientific assessments of the GCRP and National Research
14 Council, the EPA Administrator issued a determination in 2009 (74 FR 66496) that GHGs in the
15 atmosphere may reasonably be anticipated to endanger public health and welfare, based on
16 observed and projected effects of GHGs, their impact on climate change, and the public health
17 and welfare risks and impacts associated with such climate change. Based on the impacts set
18 forth in the GCRP report, and the carbon dioxide emissions criteria in the final EPA "Prevention
19 of Significant Deterioration and Title V Greenhouse Gas Tailoring Rule" (75 FR 31514), the
20 NRC concludes that the national and worldwide cumulative impacts of GHG emissions are
21 noticeable but not destabilizing. The review team bases this conclusion that the environment
22 may be noticeably affected by GHG emissions but not destabilized on the tailored approach to

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1 addressing carbon dioxide emissions in the EPA rule and the EPA Administrator's
2 determination, neither of which call for immediate action such as closure of GHG-emitting
3 facilities. Therefore, national and worldwide cumulative impacts of GHG emissions reflect
4 conditions that are noticeable but not destabilizing. The NRC further concludes that the
5 cumulative impacts would be noticeable but not destabilizing, with or without the GHG
6 emissions from continued storage.

7 **6.4.5.2 Conclusion**

8 Cumulative impacts include the incremental effects from continued storage when added to the
9 aggregate effects of other past, present, and reasonably foreseeable future actions. As
10 described in Sections 4.5 and 5.5, the incremental impacts from continued storage on climate
11 change is SMALL for all timeframes at both at-reactor and away-from-reactor storage facilities.
12 In addition, past, present, and reasonably foreseeable activities take place worldwide that could
13 contribute to climate change. The cumulative impacts from continued storage when added to
14 other past, present, and reasonably foreseeable Federal and non-federal activities, such as
15 operation of fossil-fuel-fired power plants, would be MODERATE.

16 At storage facilities where the cumulative impacts would be MODERATE from other Federal or
17 non-federal activities, the NRC determined the cumulative impacts would likely remain
18 MODERATE whether or not continued storage occurred because the incremental impacts from
19 continued storage would be minor, especially in comparison to other GHG emitters, such as
20 operation of fossil-fuel-fired power plant.

21 **6.4.6 Geology and Soils**

22 This section evaluates the effects of continued storage on geology and soils when added to the
23 aggregate effects of other past, present, and reasonably foreseeable future actions. As
24 described in Sections 4.6 and 5.6, the incremental impacts from continued storage on geology
25 and soils is SMALL for all timeframes at both at-reactor and away-from-reactor storage facilities.

26 The geographic area considered in this cumulative analysis with regard to soils is the area
27 within the site boundaries, and for geology is the area in the immediate vicinity of the at-reactor
28 or away-from-reactor storage facility. Depending on the site, the area could include rural and
29 semi-urban regions and the associated environmental conditions.

30 **6.4.6.1 Potential Cumulative Impacts from General Trends and Activities**

31 Cumulative impacts on the geology and soils of an area include (1) access to mineral or energy
32 resources, (2) destruction of unique geologic features, (3) soil loss and increased erosion
33 potential induced by construction activities, (4) soil compaction and changes to surface drainage
34 as a result of utilities and structures, and (5) potential soil contamination (both radiological and

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1 nonradiological) through inadvertent spills during normal operations (e.g., NRC 2011a–f, 2012a,
2 2013a,b). These impacts typically result from land-disturbing activities, including earthmoving,
3 grading, and excavation from constructing, operating, and decommissioning new and existing
4 energy producing plant facilities and associated infrastructures. Land usage in the vicinity of a
5 storage facility may also affect the access to mineral or energy resources.

6 The magnitude of geology and soils cumulative impacts resulting from general trends taking
7 place within the region in which a storage facility is located would depend on current land
8 utilization patterns, any proposed land-use changes, the density of impacting activities, and the
9 extent to which these activities (facilities or projects) employ mitigation measures to reduce such
10 impacts. The cumulative impacts from general trends and activities would range from minimal
11 (e.g., minor ground-disturbing activities associated with localized development in the area, see
12 NRC 2011d) to noticeable (e.g., sufficient development to noticeably **disturb** soil **disturbance**
13 near the storage facility, see NRC 2012a).

14 **6.4.6.2 Potential Cumulative Impacts from Other NRC-Regulated or Spent Fuel-Related** 15 **Activities**

16 Cumulative impacts on geologic resources and soils could result from other NRC-regulated or
17 spent fuel-related activities, such as decommissioning of the reactor power block (including the
18 spent fuel pool), ISFSI, and DTS.

19 Activities associated with decommissioning of the reactor that have a potential to affect soils
20 include (1) addition and expansion of staging and laydown areas for equipment and
21 (2) construction of temporary buildings, roads, and parking areas. In the Decommissioning
22 GEIS for power reactors (including spent fuel pools) (NRC 2002), the NRC determined that
23 impacts on the soils from these activities would be temporary and would not be detectable or
24 destabilizing. For example, in the case of most reactor sites, sufficient previously disturbed
25 areas are available for staging, laydown, and construction sites. Therefore, in the
26 Decommissioning GEIS, it was not anticipated that additional land would need to be disturbed,
27 thereby reducing the potential for increased soils impacts (NRC 2002). In addition,
28 implementing best management practices (BMPs) would reduce soil erosion and compaction.
29 These practices include, but are not limited to, minimizing the amount of disturbed land,
30 stockpiling topsoil on laydown areas prior to use, mulching and seeding in disturbed areas,
31 covering loose materials with geotextiles, using silt fences to reduce sediment loading to surface
32 water, and installing proper culvert outlets to direct flows in streams or drainages. Given that
33 the impacts from decommissioning reactors and spent fuel pools would be similar to that
34 described in the Decommissioning GEIS for reactors, impacts on onsite soils during
35 decommissioning of reactors and spent fuel pools are expected to be SMALL.

36 Activities associated with decommissioning of ISFSIs that could affect geology and soils include
37 (1) construction of roads and parking areas used during the demolition of the storage pads,

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1 casks, and support facilities and (2) removing any contaminated soils identified (from both
2 radiological and nonradiological inadvertent spills during the final radiological site survey under
3 10 CFR Part 20, Subpart E, "Radiological Criteria for License Termination." In most cases,
4 impacts associated with decommissioning of ISFSIs would be similar to or less than those
5 impacts associated with construction of ISFSIs. After decommissioning activities are complete,
6 the area previously occupied by the ISFSIs would typically be covered with topsoil, contoured,
7 and replanted with native vegetation (NRC 2005c). For example, the NRC assumed that the
8 types and magnitude of impacts from decommissioning an ISFSI would be similar to that
9 described in the Calvert Cliffs ISFSI License Renewal EA (NRC 2012c) because the facility is a
10 typical size expected for an ISFSI and the analysis assumed typical decommissioning practices.
11 Specifically, impacts on soils are related to the temporary disturbance of soil horizons as the
12 ISFSI foundation is removed, and leveling and regrading of the ISFSI area following
13 decommissioning (NRC 2012b). The NRC expects that subsurface geology would not be
14 impacted by ISFSI decommissioning because decommissioning activities typically do not extend
15 to a depth that affects the geology (NRC 2002). Because the impacts from decommissioning
16 at-reactor and away-from-reactors ISFSIs would be similar to that described in site-specific
17 ISFSI EAs and EISs, impacts on geology and soils during decommissioning are expected to be
18 SMALL.

19 6.4.6.3 Conclusion

20 Cumulative impacts on geologic resources and soils include the incremental effects from
21 continued storage when added to the aggregate effects of other past, present, and reasonably
22 foreseeable future actions. As described in Sections 4.6 and 5.6, the incremental impacts from
23 continued storage on geologic resources and soils is SMALL for all scenarios at both at-reactor
24 and away-from-reactor storage facilities. In addition, past, present, and reasonably foreseeable
25 activities take place in the geographic area of interest that could contribute to cumulative effects
26 to geology and soils. The cumulative impacts on geology and soils from continued storage
27 when added to other past, present, and reasonably foreseeable Federal and non-federal
28 activities, such as power plant construction or urbanization, would range from SMALL to
29 MODERATE. A SMALL impact would occur if no other actions occur that had overlapping,
30 noticeable effects on geological resources. A MODERATE impact would occur if other Federal
31 or non-federal actions, such as construction of new energy facilities, had overlapping impacts
32 with the continued storage of waste that noticeably alter soil and geological resources. At
33 storage facilities where the cumulative impacts would be MODERATE as a result of other
34 Federal and non-federal activities, the NRC determined that the cumulative impacts would likely
35 remain MODERATE whether or not continued storage occurred because the incremental
36 impacts from continued storage would be minor, especially in comparison to other trends, such
37 as widespread urbanization.

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Cumulative Impacts

1 **6.4.7 Surface-Water Quality and Use**

2 This section evaluates the effects of continued storage on surface-water resources when added
3 to the aggregate effects of other past, present, and reasonably foreseeable future actions. As
4

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Cumulative Impacts

1 described in Sections 4.7 and 5.7, the incremental impacts from continued storage on surface-
2 water resources is SMALL for all timeframes at at-reactor and away-from-reactor storage
3 facilities.

4 The geographic area considered in the cumulative surface-water resources analysis includes
5 the portion of waterbodies (e.g., streams, rivers, ponds, estuaries, and marine waters)
6 potentially affected by the at-reactor or away-from-reactor storage facility.

7 **6.4.7.1 Potential Cumulative Impacts from General Trends and Activities**

8 Potential cumulative impacts on surface-waterbodies would include conflicts in consumptive
9 water use, and changes to flow patterns and chemical compositions in waterbodies receiving
10 discharges from the reactor plant or storage facility (e.g., NRC 2011a–f, 2012a, 2013a,b). For
11 at-reactor and away-from-reactor storage sites, cumulative impacts could occur because of
12 multiple activities that affect the same waterbody (e.g., conflicting water demands to support
13 urban, agricultural, commercial, and industrial developments). In addition, climate change can
14 affect surface-water resources near at-reactor and away-from-reactor storage sites because of
15 runoff from more intense storms, drought, flooding, and sea-level rise (USGCRP 2009). For
16 at-reactor storage facilities, additional cumulative impacts on surface-water resources would
17 include (1) cumulative impacts due to the various impacts from an individual power plant over
18 time (e.g., consumptive water use, altered current patterns at intake and discharge structures,
19 altered chemical gradients) and (2) cumulative impacts due to closely sited power plants
20 (e.g., consumptive water-use conflicts, additive effects of cooling-tower discharges on water
21 temperature, and chemical composition) (NRC 2013a).

22 The magnitude of cumulative impacts resulting from all general trends taking place within the
23 region in which a storage facility is located would depend on the nature and location of the
24 actions relative to important waterbodies, the number and density of actions, and the extent to
25 which these actions (i.e., facilities or projects) employ mitigation measures to minimize such
26 impacts. The cumulative impacts from general trends and activities would range from minimal
27 (e.g., consumptive water use from all water users in the watershed would have minor alterations
28 to overall volume of water in the watershed, see NRC 2011d) to noticeable (e.g., the discharge
29 and runoff of increased levels of dissolved solids, particularly during low-flow conditions, could
30 noticeably alter water quality, see NRC 2011d). In rare situations, the cumulative impacts from
31 general trends and activities could be destabilizing (e.g., increased water demand from power
32 plants and the effects of climate change, especially under extreme drought conditions, could
33 potentially destabilize a river system, see NRC 2011e).

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Cumulative Impacts

1 **6.4.7.2 Potential Cumulative Impacts from Other NRC-Regulated or Spent Fuel-Related** 2 **Activities**

3 Cumulative impacts on surface-water resources could result from other NRC-regulated or spent
4 fuel-related activities, such as ground-disturbing activities that could occur during shutdown,
5 preparation activities for transportation of waste to a repository, and decommissioning of the
6 reactor, spent fuel pool, and ISFSI. Impacts could result from activities such as removal of
7 shoreline or in-water structures, dredging or filling a stream or bay, runoff, and surface soil
8 erosion. In most cases, such surface-water disturbances and water use for dust abatement
9 would be relatively minor and short-term in duration. Stormwater control measures, which
10 would be required to comply with National Pollutant Discharge Elimination System (NPDES)
11 permits, also would minimize migration of sediments or other contaminants into surface-
12 waterbodies. Dredging or filling of waterbodies would require permits from the U.S. Army Corps
13 of Engineers (USACE), which could require additional mitigation or BMPs to minimize impacts
14 on surface-water quality. In addition, other Federal, State, or local permits may require or
15 suggest BMPs, and the licensee would likely implement BMPs to minimize erosion and
16 sedimentation and control any runoff, spills, or leaks (NRC 2003a, 2005).

17 In the Decommissioning GEIS for power reactors (including spent fuel pools), the NRC (2002)
18 determined that there would be minimal impact on surface-water resources and concluded that
19 decommissioning nuclear power plants would result in SMALL impacts on surface-water
20 resources. NRC's EAs for the Calvert Cliffs, Humboldt Bay, and Diablo Canyon ISFSIs, and the
21 PFSF ISFSI EIS did not identify any significant impacts on surface-water resources during
22 decommissioning of an at-reactor, or away-from-reactor ISFSI (NRC 2003b, 2005, 2001a,
23 2012c). The NRC assumes that the types and magnitude of impacts from decommissioning an
24 ISFSI at other sites would be similar to those described in the Calvert Cliffs, Humboldt Bay, and
25 Diablo Canyon EAs and the PFSF EIS due to the limited amount of water required for
26 decommissioning and minimal impacts from ground-disturbing activities. Given that the impacts
27 from decommissioning reactors, spent fuel pools, and ISFSIs would be similar to those
28 described in the Decommissioning GEIS for reactors and site-specific ISFSI EAs and EIS,
29 impacts on surface-water resources from decommissioning are not expected to be noticeable.

30 **6.4.7.3 Conclusion**

31 Cumulative impacts on surface-water resources include the incremental effects from continued
32 storage when added to the aggregate effects of other past, present, and reasonably foreseeable
33 future actions. As described in Sections 4.7 and 5.7, the incremental impacts from continued
34 storage on surface-water resources is SMALL for all timeframes at at-reactor and away-from-
35 reactor storage facilities. In addition, past, present, and reasonably foreseeable activities take
36 place in the geographic area of interest that could contribute to cumulative effects on surface-
37 water resources. The cumulative impacts from continued storage when added to other past,
38 present, and reasonably foreseeable Federal and non-federal activities, such as urbanization,

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Cumulative Impacts

1 energy development, operation of other nearby power plants, or other water uses, would be
2 SMALL to LARGE depending on the conditions and activities surrounding the site. A SMALL
3 impact would occur if no other actions occur that have overlapping, noticeable effects on
4 surface water. A MODERATE impact would occur if other Federal or non-federal actions, such
5 as operation of other nearby power plants or future urbanization, had overlapping impacts with
6 the continued storage of waste that noticeably altered availability, flow patterns, and quality of
7 surface water. A LARGE impact would occur if other Federal or non-federal actions had
8 overlapping impacts with the continued storage of waste that destabilized surface-water
9 resources by permanently diminishing water quantity and water quality, or adversely altering
10 flow patterns in surface-waterbodies. At storage facilities where the cumulative impacts would
11 be MODERATE or LARGE from other Federal or non-federal activities, the NRC determined
12 that the cumulative impacts would likely remain MODERATE or LARGE whether or not
13 continued storage occurred because the incremental impacts from continued storage would be
14 minor, especially in comparison to other general trends, such as climate change.

15 **6.4.8 Groundwater Quality and Use**

16 This section evaluates the effects of continued storage on groundwater when added to the
17 aggregate effects of other past, present, and reasonably foreseeable future actions. As
18 described in Sections 4.8 and 5.8, the incremental impacts from continued storage on
19 groundwater resources is SMALL for all timeframes at both at-reactor and away-from-reactor
20 storage facilities.

21 The geographic area considered in the cumulative groundwater resources analysis includes the
22 portion of the uppermost aquifer and offsite public groundwater wells potentially affected by the
23 at-reactor or away-from-reactor storage facility.

24 **6.4.8.1 Potential Cumulative Impacts from General Trends and Activities**

25 For at-reactor storage facilities, two types of cumulative impacts on groundwater include:
26 (1) consumptive water use at an individual power plant over time (e.g., groundwater use for the
27 power plant's potable and reactor water makeup needs) and (2) groundwater quality
28 degradation beneath the individual power plant due to spills and leaks (NRC 2013a). For both
29 at-reactor and away-from-reactor storage facilities, cumulative impacts on groundwater could
30 occur from groundwater demands associated with current and planned urban, commercial, and
31 agricultural developments outside the storage facility site, and groundwater quality degradation
32 at the site due to past and present offsite activities. In addition, climate change and alterations
33 in surface topography and watershed use due to new developments can affect groundwater
34 levels and water levels in nearby surface-waterbodies (e.g., lakes and rivers). These
35 modifications could lead to changes in groundwater flow rates and reversal in groundwater flow
36 directions at or near the site. For example, groundwater withdrawals at coastal sites could lead
37 to saltwater intrusion. Moreover, intense use of groundwater outside the site for residential,

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Cumulative Impacts

1 industrial, or agricultural uses may cause land subsidence with temporary or permanent
2 changes in local or regional groundwater hydrology.

3 The magnitude of cumulative impacts resulting from all actions taking place within the affected
4 groundwater beneath and surrounding the storage facility would depend on the number of
5 actions (facilities or projects) that draw water from the aquifer, the overall demand on the
6 aquifer, the hydrogeologic characteristics of the aquifer, and whether facilities follow BMPs to
7 protect groundwater resources from degradation and overpumping. The cumulative impacts
8 from general trends and activities would range from minimal (e.g., past and ongoing onsite and
9 offsite activities do not cause noticeable impacts on the quality and quantity of groundwater
10 resources, see NRC 2005d) to noticeable (e.g., past and ongoing onsite and offsite activities do
11 not destabilize, but noticeably alter the quality or quantity of groundwater resources, see NRC
12 2011g). In rare situations, the cumulative impacts from general trends and activities could be
13 destabilizing (e.g., groundwater beneath the site and adjacent areas has been adversely
14 affected and noticeably destabilized by past and ongoing onsite and offsite activities, see NRC
15 2012d).

16 **6.4.8.2 Potential Cumulative Impacts from Other NRC-Regulated or Spent Fuel-Related** 17 **Activities**

18 Cumulative impacts on groundwater resources could result from other NRC-regulated or spent
19 fuel-related activities, such as ground-disturbing activities that could occur during shut down
20 activities; preparation activities for transportation of waste to a repository; as well as during
21 decommissioning of the reactor, spent fuel pool, and ISFSI. Direct impacts could result from
22 activities such as removal of shoreline, active dredging, or filling of a stream or bay. Indirect
23 impacts may result from effects such as downward infiltration or seepage of contaminated
24 surface water, oil, or other fluids from disturbed ground surface or streams into underlying
25 groundwater; or from inadvertent changes in horizontal hydraulic gradients from the site to the
26 nearest surface waterbody. These types of impacts could alter groundwater quality and flow
27 rates, reverse groundwater flow directions, and induce saltwater intrusion at sites near the
28 ocean. In most cases, however, groundwater disturbances would result in relatively minor
29 impacts (NRC 2002). Water demand for power plant operational cooling would decrease during
30 final power reactor shutdown activities and decommissioning. NPDES permitting for surface
31 discharges would minimize potential indirect contamination of underlying groundwater systems.
32 Dredging or filling of waterbodies would require permits from the USACE, which could require
33 additional mitigation or BMPs to minimize inadvertent changes in site hydrogeology and the
34 potential for seawater intrusion at a site near the ocean.

35 In the Decommissioning GEIS for nuclear power reactors (including spent fuel pools), the NRC
36 (2002) determined that there would be minimal impact on groundwater use and quality and
37 concluded that decommissioning nuclear power plants would result in SMALL impacts on
38 groundwater. NRC's EAs and EISs for the Calvert Cliffs, Humboldt Bay, and Diablo Canyon

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Cumulative Impacts

1 ISFSIs, and the PFSF ISFSI EIS did not identify any significant impacts on groundwater
2 resources during decommissioning of an at-reactor, or away-from-reactor ISFSI (NRC 2001a,
3 2003a, 2005c, 2012c). The NRC assumes that the types and magnitude of impacts from
4 decommissioning an ISFSI at other sites would be similar to those described in the Calvert
5 Cliffs, Humboldt Bay, and Diablo Canyon EAs and the PFSF EIS because a similar amount of
6 water use is expected. Given that the impacts from decommissioning reactors, spent fuel pools,
7 and ISFSIs would be similar to those described in the Decommissioning GEIS for reactors and
8 site-specific ISFSI EAs and EIS, impacts on groundwater from decommissioning are expected
9 to be SMALL.

10 **6.4.8.3 Conclusion**

11 Cumulative impacts on groundwater resources include the incremental effects from continued
12 storage when added to the aggregate effects of other past, present, and reasonably foreseeable
13 future actions. As described in Sections 4.8 and 5.8, the incremental impacts from continued
14 storage on groundwater resources is SMALL for all timeframes at both at-reactor and away-
15 from-reactor storage facilities. In addition, past, present, and reasonably foreseeable activities
16 take place in the geographic area of interest that could contribute to cumulative effects to
17 groundwater. The cumulative impacts from continued storage when added to other past,
18 present, and reasonably foreseeable Federal and non-federal activities; such as urbanization,
19 energy development, landfills, agricultural, industrial, or other water users; range from SMALL to
20 LARGE depending on the conditions and activities surrounding the site. A SMALL impact would
21 occur if continued storage and no other actions occur that have overlapping, noticeable effects
22 on groundwater. A MODERATE impact would occur if other Federal or non-federal actions,
23 such as operation of other nearby power plants or future urbanization, had overlapping impacts
24 with the continued storage of waste that noticeably altered groundwater quality and/or with the
25 continued withdrawals of groundwater that may adversely impact site groundwater hydrology.
26 A LARGE impact would occur if elevated radionuclide concentrations in groundwater from past
27 and ongoing onsite and offsite activities or significant changes in groundwater hydrology at or
28 near the site (e.g., altered hydraulic interactions between underlying shallow and confined
29 aquifers; groundwater flow reversal, which may lead to saltwater intrusion at a site near the
30 ocean) occur that would destabilize quality and quantity of groundwater resources. At storage
31 facilities where the cumulative impacts would be MODERATE or LARGE from other Federal or
32 non-federal activities, the NRC determined that the cumulative impacts would likely remain
33 MODERATE or LARGE whether or not continued storage occurred because the incremental
34 impacts from continued storage would be minor, especially in comparison to other general
35 trends, such as climate change.

36 **6.4.9 Terrestrial Resources**

37 This section evaluates the effects of continued storage on terrestrial resources, including
38 terrestrial special status species and habitats, when added to the aggregate effects of other

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Cumulative Impacts

1 past, present, and reasonably foreseeable future actions. As described in Section 4.9, the
2 incremental impacts from continued storage on terrestrial resources is SMALL for at-reactor
3 storage facilities during all timeframes. As described in Section 5.9, the incremental impacts at
4 away-from-reactor storage facilities during the short-term timeframe would be SMALL to
5 MODERATE, depending on whether construction activities noticeably alter suitable habitat for
6 local terrestrial species. During the long-term and indefinite storage timeframes, the impacts at
7 away-from-reactor storage facilities would be SMALL.

8 The geographic area considered includes terrestrial habitats on or adjacent to the at-reactor or
9 away-from-reactor storage facility site affected by continued storage as well as other terrestrial
10 habitats in the surrounding landscape closely interconnected by movement or migration of
11 species. In addition, terrestrial ecology evaluations focus on the habitats and species, both
12 plants and animals, within an ecosystem.

13 **6.4.9.1 Potential Cumulative Impacts from General Trends and Activities**

14 Cumulative impacts on terrestrial habitats and wildlife may occur because of habitat loss and
15 degradation, disturbance and displacement, injury and mortality, and obstruction of movement
16 (e.g., NRC 2011a–f, 2012a, 2013a,b). Factors that could influence impacts on terrestrial
17 resources include exposure to elevated noise levels and contaminants, altered surface-water
18 and groundwater quality and flow patterns, and hazards associated with direct contact with
19 physical structures (e.g., bird collisions with buildings and other structures). Adverse impacts
20 typically result from activities (e.g., construction) associated with urbanization, industrial and
21 commercial development, agricultural development, transportation development, water projects,
22 and regional tourism and recreation. Migratory and mobile species may be affected by activities
23 carried out in locations remote from the storage facility site. Vegetative communities (including
24 floodplain and wetland communities) also may be affected by activities (e.g., clearing and
25 grading) associated with these actions, thus creating conditions favorable for invasive species to
26 establish in the area.

27 Climate change may add to the cumulative impact on terrestrial species and habitats (e.g., NRC
28 2011a–f, 2012a, 2013a,b). Climate models project that there will tend to be less rainfall in some
29 areas in the United States and that the precipitation could possibly alter the character of
30 terrestrial habitats (GCRP 2009). This could further stress terrestrial resources affected by the
31 activities described above. For example, reduced precipitation could contribute to drawdowns in
32 some cooling-water sources and contribute to impacts on shoreline habitats of those systems.
33 Certain areas might experience increased, instead of decreased, precipitation. In these areas,
34 increased precipitation and sea-level rise could inundate low-lying areas at coastal facilities
35 (e.g., NRC 2011d). Storm frequency and intensity also could increase, and temperatures could
36 vary. The position of ecoregions can be expected to shift in response to these changes, and
37 terrestrial ecosystems can be expected to experience gradual transitions that will stress species
38 and habitats (GCRP 2009). Similarly, species ranges may shift in accordance with the changing

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Cumulative Impacts

1 environmental conditions and habitats (GCRP 2009). During continued storage, a shift in
2 species ranges could result in a storage facility affecting certain species that were not present
3 prior to continued operation. If the species is protected under the Endangered Species Act of
4 1973, as amended (ESA), the NRC would be required to initiate a ESA Section 7 consultation
5 with the U.S. Fish and Wildlife Service (FWS) or National Marine Fisheries Service (NMFS). As
6 described in Section 4.11, the NRC would evaluate any potential impacts on those species and
7 FWS or ~~the National Marine Fisheries Service (NMFS)~~ may require mitigation to minimize
8 impacts on those species.

9 The magnitude of cumulative impacts resulting from all general trends taking place within the
10 region in which a storage facility is located would depend on the nature and location of the
11 actions relative to important terrestrial resources, the number (and density) of actions, and the
12 extent to which these actions (facilities or projects) employ mitigation measures to minimize
13 such impacts. The cumulative impacts from general trends and activities would range from
14 minimal (e.g., temporary and minor changes to terrestrial habitat from limited development in
15 the area, see NRC 2011b) to noticeable (e.g., noticeable wetland loss and fragmentation of
16 wetland and upland forest habitats, see NRC 2012a).

17 **6.4.9.2 Potential Cumulative Impacts from Other NRC-Regulated or Spent Fuel-Related** 18 **Activities**

19 Cumulative impacts on terrestrial resources could result from other NRC-regulated or spent fuel-
20 related activities, such as ground-disturbing activities that could occur during shutdown
21 activities; preparation activities to transportation waste to a repository; and decommissioning of
22 the reactor, spent fuel pool, and ISFSI. For example, incremental impacts could result from
23 shoreline activities (dredging or filling of wetlands), operation of the cooling system on shoreline
24 vegetation (water withdrawal and discharge water temperature increases), and habitat
25 disturbance and fragmentation from development or removal of infrastructure and power
26 transmission-line and cooling-water pipeline rights-of-ways to support future projects.

27 Incremental impacts from continued storage may result from effects such as runoff because of
28 ground-disturbing activities and surface erosion. To help protect terrestrial habitats, stormwater
29 control measures, which would be required to comply with NPDES permitting, would minimize
30 erosion and the flow of disturbed soils or other contaminants into terrestrial habitats. Some
31 activities would require permits from the USACE, which would require mitigation for impacts on
32 jurisdictional wetlands. Consultation with the FWS and other Federal, State, or local groups
33 could result in the identification of additional mitigation or BMPs to minimize impacts on
34 terrestrial resources from noise, dust, migratory bird collisions with crane booms or other
35 construction equipment, and habitat alteration from introduction of invasive plant species. In
36 most cases, terrestrial disturbances would result in relatively minor, short-term impacts (e.g.,
37 NRC 2006, 2011e).

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Cumulative Impacts

1 In the Decommissioning GEIS for power reactors (including spent fuel pools), NRC (2002)
2 determined that terrestrial resources resulting from activities occurring within the facility's
3 operational areas would be SMALL. The NRC's EAs for the Calvert Cliffs (NRC 2012c),
4 Humboldt Bay (NRC 2005c), and Diablo Canyon ISFSIs (NRC 2003a), and the PFSF ISFSI EIS
5 (NRC 2001a) did not identify any significant impacts on terrestrial resources during
6 decommissioning of an at-reactor or away-from-reactor ISFSI. The NRC assumes that the
7 types and magnitude of impacts from decommissioning an ISFSI at other sites would be similar
8 to that described in the Calvert Cliffs, Humboldt Bay, and Diablo Canyon EAs and the PFSF EIS
9 because of the limited size and minimal impacts from ground-disturbing activities. Therefore,
10 impacts from decommissioning would likely result in relatively short-term impacts and, most of
11 the time, within previously disturbed areas. Given that the impacts from decommissioning
12 reactors, spent fuel pools, and ISFSIs would be similar to impacts described in the
13 Decommissioning GEIS for reactors and site-specific ISFSI EAs and EIS, impacts on terrestrial
14 resources from decommissioning is expected to be minimal.

15 **6.4.9.3 Conclusion**

16 Cumulative impacts on terrestrial resources include the incremental effects from continued
17 storage when added to the aggregate effects of other past, present, and reasonably foreseeable
18 future actions. As described in Section 4.9, the incremental impacts from continued storage on
19 terrestrial resources is SMALL for at-reactor storage facilities during all timeframes. As
20 described in Section 5.9, the incremental impacts at away-from-reactor storage facilities during
21 the short-term timeframe would be SMALL to MODERATE, depending on whether construction
22 activities noticeably alter suitable habitat for local terrestrial species. During the long-term and
23 indefinite storage timeframes, the impacts at away-from-reactor storage facilities would be
24 SMALL. In addition, past, present, and reasonably foreseeable activities that take place in the
25 geographic area of interest could contribute to cumulative effects to terrestrial resources. The
26 cumulative impacts from continued storage when added to other past, present, and reasonably
27 foreseeable Federal and non-federal activities, such as urbanization and energy development,
28 range from SMALL to MODERATE depending on the conditions and activities surrounding the
29 site. At sites where continued storage has minimal impacts on terrestrial resources and no
30 other actions occur that have overlapping, noticeable effects on terrestrial resources, the
31 cumulative impacts can be expected to be SMALL. At sites where construction of an away-
32 from-reactor storage facility has noticeably altered terrestrial resources, or other actions have
33 overlapping, noticeable effects on terrestrial resources, the cumulative impacts can be expected
34 to be MODERATE. For example, in more urbanized areas where certain habitats are limited,
35 MODERATE cumulative impacts may be possible if other Federal or non-federal actions, such
36 as operation of other nearby power plants or future urbanization, had overlapping impacts with
37 the continued storage of waste that noticeably altered terrestrial resources. For at-reactor
38 storage facilities where the cumulative impacts would be MODERATE from other Federal or
39 non-federal activities, the NRC determined that the cumulative impacts would likely remain

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Cumulative Impacts

1 MODERATE whether or not continued storage occurred because the incremental impacts from
2 an at-reactor continued storage facility would be minor, especially in comparison to other
3 general trends, such as climate change or urbanization.

4 **6.4.10 Aquatic Ecology**

5 This section evaluates the effects of continued storage on aquatic resources, including aquatic
6 special status species, when added to the aggregate effects of other past, present, and
7 reasonably foreseeable future actions. As described in Sections 4.10 and 5.10, the incremental
8 impacts from continued storage on aquatic resources is SMALL for all timeframes at both
9 at-reactor and away-from-reactor storage facilities.

10 The geographic area considered in this analysis includes affected aquatic habitats on or
11 adjacent to the at-reactor or away-from-reactor storage facility site as well as other aquatic
12 habitats in the surrounding landscape closely interconnected by movement or migration of
13 species using affected habitats. Depending on the site, this could include the potentially
14 affected portion of streams, rivers, ponds, lakes, estuaries, or nearshore habitats of marine
15 waters.

16 **6.4.10.1 Potential Cumulative Impacts from General Trends and Activities**

17 Cumulative impacts on aquatic habitats and species can include (1) loss and degradation of
18 habitat; (2) species disturbance, displacement, injury, and mortality; (3) obstruction of
19 movement; and (4) introduction and spread of invasive species (e.g., NRC 2011a–f, 2012a,
20 2013a,b). These impacts result from many general trends identified in Table 6-1, such as
21 industrial, commercial, agricultural, and transportation development; increased water use and
22 discharges to natural waterbodies from power plant operations (including potential replacement
23 power); habitat modification associated with urbanization and water development projects;
24 commercial and recreational fishing; and regional tourism and recreation. For aquatic resources
25 near at-reactor storage facilities, additional cumulative impacts may include impacts from an
26 individual power plant over time (e.g., entrainment, impingement, thermal discharges, and
27 chemical discharges from the power plant), (2) the cumulative impacts due to closely sited
28 power plants (e.g., the additive effects of entrainment, impingement, thermal discharges, and
29 chemical discharges from all nearby power plants), and (3) cumulative impacts due to multiple
30 general trends that affect the same waterbody at the reactor (e.g., dams, agriculture, urban, and
31 industrial development) (NRC 2013a).

32 Climate change may add to the cumulative impact on aquatic species and habitats (e.g., NRC
33 2011a–f, 2012a, 2013a,b). Changes to aquatic habitats could result from increased runoff,
34 increased surface-water temperature, increased storm intensity and frequency, sea-level rise,
35 ocean acidification, and other biological stressors (GCRP 2009). The position of ecoregions
36 can be expected to shift in response to these changes, and marine ecosystems can be

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Cumulative Impacts

1 expected to experience gradual transitions stressing species and habitats. Similarly, species
2 ranges may shift in correspondence to the changing environmental conditions and habitats
3 (GCRP 2009). During continued storage, a shift in species ranges could result in a storage
4 facility affecting certain species that were not present prior to continued operation. If the
5 species is protected under the ESA, the NRC would be required to initiate an ESA Section 7
6 consultation with the FWS or NMFS. As described in Section 4.11, the NRC would evaluate
7 any potential impacts on those species, and the FWS or NMFS may require mitigation to
8 minimize impacts on those species.

9 The magnitude of cumulative impacts resulting from all general trends taking place within the
10 region in which a storage facility is located would depend on the nature and location of the
11 actions relative to important waterbodies, the number (and density) of actions, and the extent to
12 which these actions (facilities or projects) employ mitigation measures to minimize such
13 impacts. The cumulative impacts from general trends and activities would range from minimal
14 (e.g., temporary and minor changes to aquatic habitat from limited development in the area, see
15 NRC 2011c) to noticeable (e.g., past power plant operations resulting in a noticeable decline for
16 certain fish species, see NRC 2012a). In rare situations, the cumulative impacts from general
17 trends and activities could be destabilizing (e.g., if cold-water fish species significantly decline in
18 population as a result of simultaneously being subjected to impingement and entrainment,
19 intense commercial fishing efforts, and warmer waters from climate change, see NRC 2011h).

20 **6.4.10.2 Potential Cumulative Impacts from Other NRC-Regulated or Spent Fuel-Related** 21 **Activities**

22 Cumulative impacts on aquatic resources could result from other NRC-regulated or spent fuel-
23 related activities, such as shutdown activities; preparing waste for transportation to a repository;
24 and decommissioning of the reactor power block (including the spent fuel pool), ISFSIs, and
25 DTS. Ground-disturbing activities could include the removal of shoreline or in-water structures;
26 or the active dredging; or filling of a stream or bay, which could result in increased runoff and
27 surface erosion. In most cases, impacts on aquatic resources would be minor and short-term.
28 Aquatic habitats would be protected by stormwater control measures, which would minimize the
29 flow of disturbed soils or other contaminants into aquatic features. These measures would be
30 required to comply the NPDES permits. Dredging or filling of waterbodies would require permits
31 from the USACE, which could require additional mitigation or BMPs to minimize impacts on
32 aquatic resources. In addition, other Federal, State, or local permits may require or suggest
33 BMPs that the licensee would likely implement to minimize erosion and sedimentation and
34 control any runoff, spills, or leaks (e.g., NRC 2003a, 2005c).

35 Shutdown activities could alter aquatic habitats as the amount of thermal discharge decreases
36 or ceases entirely. For example, some aquatic organisms, such as manatees, congregate and
37 overwinter in waters that are warmer than the surrounding water because of thermal discharge
38 from the plant. Other organisms, such as sea turtles or fish, could experience cold shock

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Cumulative Impacts

1 because of the change in temperature. Some of these species are protected under the ESA.
2 As described in Section 4.11, if the FWS or NMFS writes a biological opinion for a power plant,
3 the NRC would be required to consult with the FWS or NMFS if there was a change in plant
4 parameters, such as reduced thermal discharge. Consultation under the ESA would include an
5 assessment and potential mitigation factors to offset cold shock or other potential impacts on
6 listed species. In addition, operation of the spent fuel pool would reduce this impact because
7 some thermal discharge would be expected during spent fuel pool operations, as described in
8 Section 4.10.

9 In the Decommissioning GEIS for power reactors (including spent fuel pools), the NRC (2002)
10 determined that there would be minimal impact on aquatic resources and concluded that
11 decommissioning nuclear power plants would result in SMALL impacts on aquatic resources.
12 The NRC's EAs for the Calvert Cliffs, Humboldt Bay, and Diablo Canyon ISFSIs, and the PFSF
13 ISFSI EIS did not identify any significant impacts on aquatic resources during decommissioning
14 of an at-reactor or away-from-reactor ISFSI (NRC 2001a, 2003a, 2005c, 2012c). The NRC
15 assumes that the types and magnitude of impacts from decommissioning an ISFSI at other sites
16 would be similar to that described in the previous EAs and EIS because of the limited amount of
17 water required for decommissioning and minimal impacts from ground-disturbing activities.
18 Given that the impacts from decommissioning reactors, spent fuel pools, and ISFSIs would be
19 similar to that described in the Decommissioning GEIS for reactors and site-specific ISFSI EAs
20 and EISs, impacts on aquatic resources from decommissioning is expected to be minimal.

21 **6.4.10.3 Conclusion**

22 Cumulative impacts on aquatic resources include the incremental effects from continued
23 storage when added to the aggregate effects of other past, present, and reasonably foreseeable
24 future actions. As described in Sections 4.7 and 5.7, the incremental impacts from continued
25 storage on aquatic resource is SMALL for all timeframes at both at-reactor and away-from-
26 reactor storage facilities. In addition, past, present, and reasonably foreseeable activities take
27 place in the geographic area of interest that could contribute to cumulative effects on aquatic
28 resources. The cumulative impacts from past, present, and reasonably foreseeable Federal
29 and non-federal activities; such as urbanization, energy development, or other water users;
30 would range from SMALL to LARGE depending on the conditions and activities surrounding the
31 site. At sites where the surrounding development has been limited and no other actions occur
32 that have overlapping, noticeable effects on aquatic resources, the cumulative impacts can be
33 expected to be SMALL. MODERATE cumulative impacts could occur if other Federal or non-
34 federal actions, such as operation of other nearby power plants or future urbanization, had
35 overlapping impacts with the continued storage of waste that noticeably altered aquatic
36 resources. LARGE impacts are not as likely but could occur under exceptional circumstances
37 such as if other Federal or non-federal actions, such as intense fishing pressure or changes in
38 aquatic habitats from climate change, had overlapping impacts with the continued storage of

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1 waste that destabilized aquatic resources. At storage facilities where the cumulative impacts
2 would be MODERATE or LARGE from other Federal or non-federal activities, the NRC
3 determined that the cumulative impacts would likely remain MODERATE or LARGE whether or
4 not continued storage occurred because the incremental impacts from continued storage would
5 be minor, especially in comparison to other general trends, such as climate change or fishing.

6 **6.4.11 Historic and Cultural Resources**

7 This section evaluates the effects of continued storage on historic and cultural resources when
8 added to the aggregate effects of other past, present, and reasonably foreseeable future
9 actions. As described in Sections 4.12 and 5.12, the incremental impacts from continued
10 storage on historic and cultural resources would be SMALL (no impacts on historic and cultural
11 resources) during short-term storage for at-reactor ISFSIs. During short-term for away-from
12 reactor ISFSIs and during long-term and indefinite storage timeframes at away-from-reactor and
13 at-reactor ISFSIs, the impacts could range from SMALL, MODERATE, or LARGE (impacts
14 could range from no adverse effects to historic properties/no impacts on historic and cultural
15 resources to adverse effects to historic properties/impacts on historic and cultural resources).
16 The actual incremental impacts from continued storage depend on site-specific conditions, as
17 described in Sections 4.12 and 5.12.

18 The geographic area considered in the cumulative historic and cultural resources analysis
19 includes the area of potential effect that may be affected by land-disturbing or other operational
20 activities associated with continued storage of spent fuel, including the viewshed. This
21 determination is made irrespective of land ownership or control. Cumulative impacts on historic
22 and cultural resources relate to the damage or destruction of these resources (i.e.,
23 archaeological sites, historic structures, and traditional cultural properties, or their context).
24 Adverse effects to historic properties or historic and cultural resources (e.g., archaeological sites
25 or historic structures) would occur if these resources in the area of potential effect are physically
26 removed or disturbed. In this regard, potential cumulative impacts for this resource area are
27 localized and limited to the area of physical disturbance. Adverse visual effects could occur if
28 an undertaking results in the introduction of significant visual intrusions within the viewshed.
29 Historic and cultural resources are nonrenewable resources that are affected by natural and
30 man-made actions. Once these resources are removed or destroyed, they cannot be restored,
31 rebuilt, or repaired; therefore, the impact of destruction of historic and cultural resources is a
32 cumulative impact.

33 **6.4.11.1 Potential Cumulative Impacts from General Trends and Activities**

34 Cumulative impacts on historic and cultural resources typically result from ground-disturbing
35 activities (e.g., earthmoving, blasting, grading, and excavation) within the area of potential effect
36 and are site-specific. Impacts could occur from activities associated with new energy projects
37 (e.g., replacement power facilities) or potential industrial, commercial, agricultural, and

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1 transportation if development occurs within the area of potential effect (NRC 2013). For
2 example, if a new energy project is co-located with the existing at-reactor or away-from-reactor
3 ISFSI, there could be adverse impacts on historic properties or historic and cultural resources
4 associated with the construction and operation of the new facility. Such activities may directly
5 damage or destroy cultural artifacts or increase the potential for their exposure by accelerating
6 erosion, leaving them vulnerable to theft and vandalism.

7 The magnitude of cumulative impacts resulting from general trends taking place within and
8 surrounding the area of potential effect would depend on the nature and location of the actions
9 (facilities or projects), what resources are present, the extent of land disturbance, whether
10 cultural resource surveys are conducted, and the extent to which these actions employ
11 mitigation measures. Additionally, only Federal undertakings require compliance with the
12 National Historic Preservation Act (NHPA) Section 106 procedural requirements. However,
13 some States have similar Section 106 procedural or environmental review requirements.
14 Cumulative impacts would range from minimal (e.g., no impacts on historic and cultural
15 resources/no historic properties affected, see NRC 2011h) to noticeable (e.g., construction and
16 operation of a new coal-fired power plant or new transmission lines would result in a noticeable
17 impact on historic and cultural resources/adverse effects to historic properties, see NRC 2011c),
18 to destabilizing (e.g., impacts on historic and cultural resources/adverse effects to three National
19 Register listed/eligible historic properties including two historic buildings/structures—Baltimore &
20 Drum Point Railroad [CT-1259]—and Camp Conoy [CT-1312] and one archaeological site
21 [18CV474] that may be the remnants of a residence associated with the lives of slaves and/or
22 tenants, sharecroppers, or freed African Americans, see NRC 2011d).

23 **6.4.11.2 Potential Cumulative Impacts from Other NRC-Regulated or Spent Fuel-Related** 24 **Activities**

25 Cumulative impacts on historic and cultural resources could result from other NRC-regulated or
26 spent fuel-related activities, such as decommissioning of the reactor power block (including the
27 spent fuel pool), ISFSI, and DTS.

28 The environmental impacts associated with reactor decommissioning were assessed in the
29 Decommissioning GEIS (NRC 2002). Activities associated with decommissioning of the reactor
30 power block (including the spent fuel pool) that could affect historic and cultural resources
31 include (1) addition and expansion of staging and laydown areas for equipment, (2) construction
32 of temporary buildings and parking areas, (3) stabilization, (4) decontamination and
33 dismantlement, and (5) removal of large reactor components (NRC 2002, 2013a). These
34 activities could affect cultural resources primarily via land disturbance, which could damage or
35 destroy the resource, or alter the contextual setting of historic and cultural resources (NRC
36 2002). Decommissioning activities conducted within the operational areas (i.e., the power
37 block) are not expected to affect historic and cultural resources because much of the land within
38 and immediately surrounding the power block was extensively disturbed during initial nuclear

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1 power plant construction. Therefore, if ground-disturbing activities are limited to operational
2 areas, impacts on historic and cultural resources would be SMALL (NRC 2002). Should
3 ground-disturbing activities occur outside of power block, some impacts could be noticeable or
4 destabilizing; there could be adverse effects to historic properties and impacts on other historic
5 and cultural resources (NRC 2002). Prior to ground-disturbing activities commencing in areas
6 outside the power block area, cultural resource surveys should be conducted to identify and
7 protect any historic properties and other historic and cultural resources (i.e., adherence to
8 management plans and procedures).

9 Activities associated with decommissioning of ISFSIs include dismantling and removing the
10 concrete storage casks, concrete pads, and support facilities, including the DTS, and removing
11 any contaminated soils identified during the final radiological site survey. A review of NRC EAs
12 and EISs for specifically licensed at-reactor and away-from-reactor ISFSIs did not identify any
13 significant impacts on historic and cultural resources during decommissioning (e.g., NRC 2001a,
14 2003a, 2005a–c, 2009, 2012c). However, prior to decommissioning activities commencing, a
15 final decommissioning plan must be submitted to the NRC for review and approval in
16 accordance with 10 CFR 72.54(g)(1)–(6), 72.54(d), and 72.54(i). NRC authorization of a final
17 decommissioning plan would constitute a Federal action under NEPA and would be an
18 undertaking under the NHPA. The site-specific environmental review and compliance with the
19 NHPA process could identify historic properties, adverse effects and potentially resolve adverse
20 effects to historic properties and impacts on other historic and cultural resources. After
21 decommissioning is completed, the area previously occupied by the at-reactor or away-from-
22 reactor ISFSI would typically be covered with topsoil, contoured, and replanted with native
23 vegetation (NRC 2005a). Should ground-disturbing activities occur outside of ISFSI footprint,
24 some impacts could be noticeable or destabilizing. The magnitude of impact largely depends
25 on what resources are present, the extent of proposed land disturbance, if the area has been
26 previously surveyed, and if the licensee has management plans and procedures that are
27 protective of historic and cultural resources.

28 **6.4.11.3 Conclusion**

29 Cumulative impacts on historic and cultural resources include the incremental effects from
30 continued storage when added to the aggregate effects of other past, present, and reasonably
31 foreseeable future actions. As described in Sections 4.12 and 5.12, the incremental impacts
32 from continued storage on historic and cultural resources would be SMALL (no impacts on
33 historic and cultural resources) for the short-term timeframe for an at-reactor ISFSI. During the
34 short-term for away-from-reactor ISFSIs and during long-term and indefinite storage timeframes
35 at away-from-reactor and at-reactor ISFSIs, the impacts could range from SMALL, MODERATE,
36 or LARGE (impacts could range from no adverse effects on historic properties/no impacts on
37 historic and cultural resources to adverse effects on historic properties/impacts on historic and
38 cultural resources) depending on site-specific factors. In addition, past, present, and reasonably

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1 foreseeable activities take place in the area of potential effect that could also contribute to
2 cumulative effects to historic and cultural resources. The cumulative impacts on historic and
3 cultural resources from continued storage when added to other past, present, and reasonably
4 foreseeable Federal and non-federal activities are SMALL, MODERATE, or LARGE (impacts
5 could range from no adverse effects on historic properties/no impacts on historic and cultural
6 resources to adverse effects on historic properties/impacts on historic and cultural resources)
7 depending on site-specific factors, which could include resources that are present, the extent of
8 proposed land disturbance, previous surveys, and management plans and procedures that are
9 protective of historic and cultural resources. The effect of the actions would be a SMALL impact
10 (no impacts on historic and cultural resources or no adverse impact on historic properties) at
11 sites where continued storage and no other actions occur that have overlapping, noticeable
12 effects on historic and cultural resources within the area of potential effect. MODERATE to
13 LARGE impacts (impacts on historic and cultural resources or adverse impacts on historic
14 properties) could occur at sites where NRC, or other Federal or non-federal actions (such as
15 new energy projects and other forms of potential development within and surrounding the area
16 of potential effect), have overlapping impacts with the continued storage of waste that noticeably
17 affect or destabilize historic and cultural resources.

18 **6.4.12 Noise**

19 This section evaluates the effects of continued storage on noise when added to the aggregate
20 effects of other past, present, and reasonably foreseeable future actions. As described in
21 Sections 4.13 and 5.13, the incremental impacts from continued storage on noise is SMALL
22 overall for all timeframes for both at-reactor and away-from-reactor storage facilities.

23 The geographic area considered in the cumulative noise analysis extends in a radius of about
24 7.8 km (4.8 mi) from the noise sources originating from an at-reactor or away-from-reactor
25 storage facility site. At a distance of about 3.9 km (2.4 mi) from a noise source, most sound
26 levels would be reduced to less than the 55-dB(A) EPA-recommended threshold for protection
27 against outdoor activity interference and annoyance. A receptor, ~~which~~ can be affected by
28 noise sources from the at-reactor and away-from-reactor ISFSIs up to about 3.9 km (2.4 mi)
29 away. Therefore, the NRC considered other noise sources within a 3.9 km (2.4 mi) radius of the
30 receptor for potential cumulative effects. This effectively creates a cumulative geographic area
31 of interest within a 7.8 km (4.8 mi) radius from the spent fuel noise sources.

32 **6.4.12.1 Potential Cumulative Impacts from General Trends and Activities**

33 Noise levels in the vicinity of a storage facility could be the result of activities (e.g., traffic)
34 associated with urban, industrial, and commercial development (including transportation
35 development) and water projects (e.g., NRC 2011a–f, 2012a, 2013a,b). The magnitude
36 of cumulative impacts resulting from all general trends would depend on the plant's
37 proximity to these activities. Because noise impacts cease once an activity stops, the

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1 noise would need to occur at the same time as continued storage in order for the
2 impacts to be overlapping or cumulative.

3 The magnitude of cumulative impacts resulting from all general trends taking place within the
4 cumulative geographic area of interest would (1) be dominated by the loudest audible source
5 because noise does not add linearly and (2) depend on the sound level generated by the noise
6 sources and the proximity of the receptor to the noise sources. The cumulative impacts from
7 general trends and activities would range from minimal (e.g., the sound levels generated by the
8 noise sources and proximity of these sources to receptors only produce minor impacts, see
9 NRC 2011d), to noticeable (e.g., potential noise levels from cooling-water system pumps
10 associated with the operation of co-located nuclear reactor units, see NRC 2011e). The NRC
11 also acknowledges that the noise impacts from operation of a fossil-fuel power plant near a
12 storage facility could result in noticeable impacts (e.g., delivery of coal and limestone by train,
13 see NRC 2011e).

14 **6.4.12.2 Potential Cumulative Impacts from Other NRC-Regulated or Spent Fuel-Related** 15 **Activities**

16 Cumulative noise impacts could result from other NRC-regulated or spent fuel-related activities,
17 such as (1) decommissioning of the reactor power block (including the spent fuel pool), ISFSI,
18 and DTS; (2) loading of casks for transportation to a repository; and (3) long-range
19 transportation of spent fuel.

20 The primary noise source associated with decommissioning of the power reactor block is the
21 use of construction equipment to dismantle and remove buildings and structures. The
22 Decommissioning GEIS (NRC 2002) analyzed noise impacts for decommissioning a reactor
23 (including the spent fuel pools); and determined that the noise impacts would not be noticeable
24 enough to routinely disrupt human activity. However, this analysis was based on the
25 implementation of some mitigation measures (e.g., restrictions on when noise producing
26 activities could be conducted). Unmitigated impacts, however, could be disruptive to human
27 activity. Such mitigation measures may not be required by Federal regulations, but may be
28 required by local ordinances. Given that the impacts from decommissioning reactors and spent
29 fuel pools considered in this draft GEIS would be similar to that described in the
30 Decommissioning GEIS, the impacts on at-reactor facilities during decommissioning are
31 expected to be minimal.

32 The primary noise source associated with decommissioning of an ISFSI and DTS is the use of
33 construction equipment to dismantle and remove concrete storage casks, concrete pads, and
34 support facilities. Although ISFSI decommissioning was not addressed in the Decommissioning
35 GEIS, it was addressed in the PFSF EIS (NRC 2001a). The PFSF EIS concluded that the
36 impacts overall were SMALL. However, the conclusion was based on the fact that the distance
37 between the noise source and nearest resident was 3 km (2 mi) and the 95 dB(A) sound levels

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1 at the source would be reduced to ambient conditions at those distances. In a broader
2 application for other locations, the distance between noise source and receptor is important
3 when assessing whether the sound levels alter noticeably important attributes of the source.

4 The loading of cask for transportation to a repository would have similar noise sources, noise
5 levels, and impact magnitude as the receiving of spent fuel at an away-from-reactor facility from
6 at-reactor locations as described in Section 5.1.2. Therefore, close to the source, noise levels
7 would exceed the 55 dB(A) EPA-recommended level for protection against outdoor activity and
8 interference and annoyance. At distances greater than about 3.9 km (2.4 mi), the noise level of
9 100 dB(A) at the source would be reduced to below this EPA-recommended protection level.

10 Disposal of spent fuel requires long-range transportation from the storage site to a repository.
11 The at-reactor storage operation examines the impacts of a facility with a 1,600-MTU capacity,
12 whereas the away-from-reactor storage operation examines the impacts of a facility with a
13 40,000-MTU capacity. The Yucca Mountain EIS (DOE 2008) assessed the noise impacts at the
14 national and state levels for long-range transport of 70,000 MTHM of spent fuel to the
15 repository. The Yucca Mountain EIS concluded that the noise impacts would be small at the
16 national level in comparison with the impacts of other nationwide transportation activities. At the
17 state level, noise could be noticeable in situations where receptors were near transportation
18 routes. Because the amount of spent fuel and the associated number of shipments (i.e., the
19 frequency at which the source generates noise) considered in the transportation analyses for an
20 at-reactor or away-from-reactor storage site is less than that considered in the Yucca Mountain
21 analyses, the NRC concludes that the transportation noise impacts for an at-reactor or away-
22 from-reactor site would not be greater than the impact magnitude in the Yucca Mountain EIS.

23 **6.4.12.3 Conclusion**

24 Cumulative noise impacts include the incremental effects from continued storage when added to
25 the aggregate effects of other past, present, and reasonably foreseeable future actions. As
26 described in Sections 4.13 and 5.13, the incremental impacts from continued storage on noise
27 is overall SMALL for all timeframes at both at-reactor and away-from-reactor storage facilities.
28 In addition, past, present, and reasonably foreseeable activities take place in the geographic
29 area of interest that that could contribute to cumulative effects to noise. The cumulative impacts
30 from continued storage when added to other past, present, and reasonably foreseeable Federal
31 and non-federal activities, such as activities from industrial and commercial development, are
32 SMALL to MODERATE depending on the noise sources and proximity to receptors. In most
33 cases, a SMALL cumulative impact would be expected, and would occur if no other actions had
34 overlapping, noticeable effects that altered important attributes of the noise. A MODERATE
35 impact could occur if other actions occur that did have overlapping and noticeable impacts that
36 altered important noise attributes such as operation of a nearby fossil-fuel-fired power plant. At
37 storage facilities where the cumulative impacts would be MODERATE from other Federal or
38 non-federal activities, the NRC determined that the cumulative impacts would likely remain

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1 MODERATE whether or not continued storage occurred because the incremental impacts from
2 continued storage would be minor, especially in comparison to other general trends, such as
3 operation of a fossil-fuel-fired power plant.

4 **6.4.13 Aesthetics**

5 This section evaluates the effects of continued storage on aesthetic resources when added to
6 the aggregate effects of other past, present, and reasonably foreseeable future actions. As
7 described in Sections 4.14 and 5.14, the incremental impacts from continued storage on
8 aesthetics is SMALL for all timeframes for an at-reactor storage facility, and SMALL to
9 MODERATE for an away-from-reactor storage facility. The geographic area considered in the
10 cumulative aesthetic resources analysis includes the area from which the at-reactor or away-
11 from-reactor storage facility is visible.

12 **6.4.13.1 Potential Cumulative Impacts from General Trends and Activities**

13 Cumulative impacts on aesthetic resources come from changes to the visual appeal of a tract of
14 land. The magnitude of cumulative impacts on aesthetic resources depends on the degree to
15 which the facility contrasts adversely with the existing landscape and is a function of the visibility
16 of dry storage pads, canisters, and handling facilities from neighborhoods or roads, across
17 waterbodies, or from higher topographic elevations. The visibility of at-reactor ISFSIs is
18 generally lower than the nuclear power plant because of the lower profile of the storage facility.
19 Cumulative impacts also depends in part on the degree of public interest and concern over
20 potential changes to the existing scenic quality.

21 The continuation of general trends occurring at or near nuclear power plants and storage
22 facilities could result in overlapping aesthetic impacts during continued storage. For example,
23 the construction and operation of energy and infrastructure projects, such as transmission lines
24 and liquefied natural gas terminals, could result in noticeably adverse impacts on the area.
25 Also, increased population growth in the surrounding area could lead to an increase in the
26 number of viewers, the frequency and duration of views, and in the perceived impact level.

27 The magnitude of cumulative impacts resulting from all general trends taking place within the
28 region in which a storage facility is located would depend on the number of structures affecting
29 the landscape, the degree of contrast, the degree of visibility (which, in turn, depends on the
30 distance and angle from which the landscape is viewed), the value of the landscape, the
31 number of viewers, the frequency and duration of views, and viewer perception of the impact
32 level. The cumulative impacts from general trends and activities would range from minimal
33 (e.g., limited development resulted in minor changes within the viewshed, [NRC 2011c]) to
34 noticeable (e.g., construction of a new power plant or storage would noticeably alter the scenic
35 quality of the area by introducing an industrial presence into a largely undeveloped landscape,
36 see NRC 2011a and 2001a).

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1 **6.4.13.2 Potential Cumulative Impacts from Other NRC-Regulated or Spent Fuel-Related**
2 **Activities**

3 Cumulative impacts on aesthetic resources could result from other NRC-regulated or spent fuel-
4 related activities, such as changes to operational characteristics of the facility (e.g., the
5 condensation plume from a cooling tower) during shutdown and dismantlement, demolition, and
6 removal of structures during decommissioning could have direct aesthetic impacts. Aesthetic
7 impacts from the removal of structures would be a long-term change, and ~~is~~-are generally
8 considered beneficial to the visual appeal of a site.

9 In the Decommissioning GEIS for power reactors (including spent fuel pools), the NRC (2002)
10 determined that the impacts on aesthetic resources during decommissioning would be SMALL,
11 and that any impact would be temporary and would serve to reduce the aesthetic impact of the
12 site. The impacts from decommissioning ISFSIs were not considered in the Decommissioning
13 GEIS. Aesthetic impacts from decommissioning the smaller structure of an ISFSI would be no
14 greater than that for decommissioning a nuclear power plant because of the smaller size of the
15 ISFSI. NRC's EAs for the Calvert Cliffs, Surry, and Diablo Canyon ISFSIs, and the PFSF ISFSI
16 EIS did not identify any significant impacts on aesthetic resources during decommissioning of
17 an at-reactor or away-from-reactor ISFSI (NRC 2001a, 2003a, 2005a, 2012c). The NRC
18 assumes that the types and magnitude of impacts from decommissioning an ISFSI at other sites
19 would be similar to that described in the Calvert Cliffs, Surry, and Diablo Canyon EAs and the
20 PFSF EIS because the activities that take place during decommissioning and the change in
21 visual characteristics that would occur at other sites would be similar to those evaluated in the
22 Calvert Cliffs, Surry, and Diablo Canyon EAs and the PFSF EIS.

23 Given that the impacts from decommissioning reactors, spent fuel pools, and ISFSIs would be
24 similar to the impacts described in the Decommissioning GEIS for reactors and site-specific
25 ISFSI EAs and EISs, impacts on aesthetic resources from decommissioning are expected to be
26 minimal,
and that any impact would be temporary.

27 **6.4.13.3 Conclusions**

28 Cumulative impacts on aesthetic resources include the incremental effects from continued
29 storage when added to the aggregate effects of other past, present, and reasonably foreseeable
30 future actions. As described in Sections 4.14 and 5.14, the incremental impacts from continued
31 storage on aesthetic resources is SMALL for all timeframes for at-reactor storage facilities and
32 SMALL to MODERATE for away-from-reactor storage facilities. In addition, past, present, and
33 reasonably foreseeable activities take place in the geographic area of interest that could
34 contribute to cumulative effects to aesthetic resources. The cumulative impacts from continued
35 storage and other past, present, and reasonably foreseeable Federal and non-federal activities
36 range from SMALL to MODERATE depending on the incremental impact from the storage
37 facility and the conditions and activities surrounding the site. A SMALL impact would occur at

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1 sites where storage facilities have minimal impacts on the viewshed and no other actions occur
 2 that had overlapping, noticeable effects on aesthetic resources. A MODERATE impact would
 3 occur if the storage facility has a noticeable impact on the viewshed, or if other Federal or non-
 4 federal actions, such as the construction and operation of other nearby power plants or future
 5 urbanization, had overlapping impacts with the continued storage of waste that noticeably
 6 altered aesthetic resources. At storage facilities where the incremental impacts are SMALL and
 7 cumulative impacts are MODERATE from other Federal or non-federal activities, the NRC
 8 determined that the cumulative impacts would likely remain MODERATE whether or not
 9 continued storage occurred because the incremental impacts from continued storage would be
 10 minor, especially in comparison to other general trends, such as constructing new power plants.

11 6.4.14 Waste Management

12 This section evaluates the effects of continued storage on the capacity and operating lifespan of
 13 waste-management facilities when added to the aggregate effects of other past, present, and
 14 reasonably foreseeable future actions. The incremental impacts from continued storage on
 15 waste management are described in Sections 4.15 and 5.15 and summarized in Table 6-3. In
 16 addition to the incremental impacts from continued storage, this cumulative impacts analysis
 17 also considers other past, present, and reasonably foreseeable projects that could affect waste
 18 management. The geographic area considered in the cumulative LLW and mixed-waste-
 19 management resources analysis includes the continental United States because LLW disposal
 20 facilities handle waste generated on a national scale. The geographic area considered in the
 21 cumulative nonradioactive waste (i.e., hazardous and nonhazardous wastes) management
 22 resources analysis includes the area where the continued storage of spent fuel occurs and
 23 nonradioactive waste is sent for disposal.

24 **Table 6-3.** Summary of Incremental Impacts from Continued Storage on Waste Management

Storage Timeframe	At-Reactor Storage (Section 4.15)		Away-From-Reactor Storage (Section 5.15)	
Short-Term	LLW	SMALL	LLW	SMALL
	Mixed Waste	SMALL	Mixed Waste	SMALL
	Nonradioactive ^(a)	SMALL	Nonradioactive ^(a)	SMALL
Long-Term	LLW	SMALL	LLW	SMALL
	Mixed Waste	SMALL	Mixed Waste	SMALL
	Nonradioactive ^(a)	SMALL	Nonradioactive ^(a)	SMALL
Indefinite	LLW	SMALL	LLW	SMALL
	Mixed Waste	SMALL	Mixed Waste	SMALL
	Nonradioactive ^(a)	SMALL to MODERATE	Nonradioactive ^(a)	SMALL to MODERATE

(a) Nonradioactive waste includes hazardous and nonhazardous wastes.

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1 **6.4.14.1 Potential Cumulative Impacts from General Trends and Activities**

2 Cumulative impacts on waste management could include reduction in landfill capacity needed
3 for the proper disposal of the total amount of LLW, mixed waste, and nonradioactive waste
4 resulting from all reasonably foreseeable Federal and non-federal activities. These impacts
5 result from waste-generating activities associated with residential, commercial, industrial, and
6 military development. The potential cumulative impacts associated with the management of
7 each waste type are discussed below.

8 ***Low-Level Waste and Mixed Waste***

9 In addition to LLW generated at operating reactors and other uranium fuel cycle facilities, other
10 radioactive waste-generating activities that can occur in the same regions as operating reactors
11 including activities at DOE and U.S. Department of Defense installations, as well as industrial
12 facilities and hospitals where radioisotopes are used for industrial or medical purposes (NRC
13 2013a). These same activities are potential generators of both LLW and mixed waste.

14 The magnitude of cumulative waste-management impacts resulting from general trends would
15 depend on current radioactive waste-generating activities, generation rates, potential changes in
16 waste-generating activities and rates, and the extent to which these waste generators employ
17 mitigation measures to reduce such impacts. LLW and mixed waste can only be disposed of in
18 a limited number of disposal facilities, as described in Section 3.14. Depending on the locations
19 of the radioactive waste generators and the locations of available treatment and disposal
20 facilities, there could be cumulative impacts resulting from the transportation, treatment, and
21 disposal of radioactive waste (NRC 2013a). The cumulative impacts from general trends and
22 activities would range from minimal (e.g., minor changes in available disposal capacity and
23 limited development of new governmental, industrial, and medical radioactive waste-generating
24 activities, see NRC 2013a,b) to noticeable (e.g., loss in available disposal capacity and
25 expanded or new governmental, industrial, and medical radioactive waste-generating activities).

26 ***Nonradioactive Waste***

27 In addition to nuclear reactor operations, residential, commercial, and industrial activities also
28 generate nonradioactive waste. Nonradioactive waste includes hazardous and nonhazardous
29 wastes and is typically disposed of in local or regional treatment facilities and landfills.
30 Hazardous waste treatment, storage, and disposal facilities or nonhazardous waste landfills are
31 constructed and operated by local or regional units of government or private companies. The
32 facility size or landfill capacity is based on the projected waste disposal needs for the
33 geographic area or region that the facility or landfill serves. Municipal solid waste landfills in the
34 United States typically have capacities ranging from 1,200,000 m³ (1,600,000 yd³) to more than
35 45,000,000 m³ (59,000,000 yd³) of compacted solid waste (EREF 1999).

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1 The magnitude of cumulative impacts from the management of nonradioactive wastes resulting
2 from all waste-generating actions taking place in the area in which a storage facility is located
3 would likely be minimal (e.g., minor changes in available facility or landfill capacity and limited
4 increase of waste generation by new residential, commercial, and industrial development, see
5 NRC 2013a,b) to noticeable (e.g., minor changes or decrease in available capacity and major
6 increase in waste generation by new residential, commercial, and industrial development).

7 **6.4.14.2 Potential Cumulative Impacts from Other NRC-Regulated or Spent Fuel-Related** 8 **Activities**

9 Cumulative impacts on waste-management resources could result from other NRC-regulated or
10 spent fuel-related activities, such as decommissioning of a nuclear power plant (including the
11 spent fuel pool), ISFSI, and DTS. These activities would generate LLW, mixed waste, and
12 nonradioactive waste. Although it would not affect nonradioactive waste disposal on a regional
13 level because of the local availability of nonradiological disposal facilities, construction and
14 operation of a repository for spent fuel disposal would contribute additional LLW and mixed
15 waste, adding to the cumulative impacts from LLW and mixed waste disposal on the limited
16 number of treatment and disposal facilities available throughout the United States.

17 ***Low-Level Waste and Mixed Waste***

18 The LLW and mixed-waste-management impacts from reactor decommissioning, including a
19 spent fuel pool, would depend on the size of the reactor and pool. The estimated volume of
20 LLW generated by reactor decommissioning ranges from 580 m³ (760 yd³) to 32,800 m³
21 (42,900 yd³) (NRC 2002). This quantity of LLW would be generated over a period ranging from
22 about 5 to 14 years depending on the decommissioning option undertaken (NRC 2002). A
23 conservative estimate of the LLW generated annually, using the maximum volume of LLW of
24 32,800 m³ (42,900 yd³), is 6,560 m³ (8,580 yd³) for a reactor decommissioning lasting 5 years to
25 2,340 m³ (3,060 yd³) for a reactor decommissioning lasting 14 years. This range of annual
26 quantities of LLW is much larger than the average annual quantity of LLW produced during
27 reactor operation, which is about 300 m³ (392 yd³) for a pressurized water reactor and about
28 600 m³ (785 yd³) for a boiling water reactor (NRC 1996). In the License Renewal GEIS, the
29 NRC considered the LLW that would be generated by decommissioning and concluded that
30 there is reasonable assurance that sufficient LLW disposal capacity will be made available when
31 needed for facilities to be decommissioned consistent with NRC requirements (NRC 2013a).

32 Mixed waste would also be generated at an increased rate during reactor decommissioning
33 relative to reactor operation. The quantity of mixed waste generated during reactor operation is
34 a small fraction of the quantity of LLW (NRC 2013a). Because of similarities in waste-
35 generating activities during reactor operation and decommissioning, the quantity of mixed waste
36 generated during reactor decommissioning is expected to continue to be a small fraction of the
37

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1 quantity of LLW. Despite an increase in the generation rate of mixed waste during
2 decommissioning, the quantity of mixed waste produced is expected to remain small relative to
3 available disposal capacity.

4 The decommissioning of dry spent fuel storage facilities would also generate LLW and mixed
5 waste. The types and quantities of LLW and mixed waste generated during decommissioning
6 would be similar to facility replacement, as described in Sections 4.15 and 5.15. The NRC has
7 determined, as described in Sections 4.15 and 5.15, that the incremental impacts from the
8 management and disposal of LLW and mixed waste associated with facility replacement would
9 be SMALL for LLW and mixed waste.

10 The construction and operation of a repository for spent fuel disposal would also generate LLW.
11 The final EIS for the proposed repository at Yucca Mountain, Nevada, projected that 74,000 m³
12 (97,000 yd³) of LLW would be generated from the construction and operation of that facility
13 (DOE 2008). The period of construction and operation of the proposed repository was
14 estimated to be greater than 100 years. The DOE determined that the environmental impacts
15 from management and disposal of LLW would be SMALL, because the treatment and disposal
16 capacity exceeds the demand created by the quantities of LLW generated. The DOE indicated
17 that no mixed waste would be generated during the construction and operation of the repository
18 (DOE 2008).

19 The magnitude of cumulative waste-management impacts resulting from management and
20 disposal of LLW and mixed waste generated from continued storage of spent fuel,
21 decommissioning of nuclear facilities, and construction and operation of a repository for spent
22 fuel disposal would depend on current radioactive waste-generating activities and generation
23 rates and potential changes in waste-generating activities and rates. It would also depend on
24 the extent to which these waste generators employ mitigation measures to reduce such
25 impacts. The cumulative impacts from general trends and activities would range from minimal
26 (e.g., minor changes in available disposal capacity and limited or no increases in other NRC-
27 regulated or spent fuel-related radioactive waste-generating activities,) to noticeable (e.g., loss
28 in available disposal capacity and increases in other NRC-regulated or spent fuel-related
29 activities that produce radioactive waste). Large cumulative waste-management impacts could
30 occur in the unlikely event that available disposal capacity decreases and radioactive waste
31 generation increases as a result of multiple other NRC-regulated or spent fuel-related activities
32 occurring concurrently.

33 ***Nonradioactive Waste***

34 The nonradioactive waste-management impacts from reactor decommissioning, including a
35 spent fuel pool, would depend on the size of the reactor and pool. Similar to LLW and mixed
36 waste, reactor decommissioning generates nonradioactive waste at an increased rate relative to
37 operation over a period ranging from about 5 to 14 years, depending on the decommissioning

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1 option undertaken. Because the increased waste generation during decommissioning occurs
2 for a relatively short period of time and decommissioned reactors must continue to comply with
3 Federal and State regulations in terms of storage, treatment, and disposal of waste, the NRC
4 determined in the License Renewal GEIS (NRC 2013a) that the cumulative impacts resulting
5 from the management of nonradioactive wastes resulting from all waste-generating actions
6 taking place within the region in which an operating reactor is located would be SMALL.

7 The decommissioning of dry spent fuel storage facilities would also generate nonradioactive
8 waste. The types and quantities of nonradioactive waste generated during decommissioning
9 would be similar to facility replacement, as described in Sections 4.15 and 5.15. The NRC has
10 determined, as described in Sections 4.15 and 5.15, that the incremental impacts from
11 management and disposal of nonradioactive waste associated with dry storage facility
12 replacement would be SMALL for short-term and long-term storage and SMALL to MODERATE
13 for indefinite storage.

14 The magnitude of cumulative waste-management impacts resulting from management and
15 disposal of nonradioactive waste generated from continued storage of spent fuel and
16 decommissioning of nuclear facilities would depend on current nonradioactive waste-generating
17 activities and generation rates, potential changes in waste-generating activities and rates in an
18 area, and the extent to which waste generators in an area employ mitigation measures to
19 reduce such impacts. The cumulative impacts from general trends and activities would range
20 from minimal (e.g., minor changes in available landfill capacity and limited or no increases in
21 other NRC-regulated or spent fuel-related radioactive waste-generating activities,) to noticeable
22 (e.g., loss in available landfill capacity and increases in other NRC-regulated or spent fuel-
23 related activities that produce nonradioactive waste). Large cumulative waste-management
24 impacts could occur in the unlikely event that available landfill capacity decreases and
25 nonradioactive waste generation increases as a result of multiple other NRC-regulated or spent
26 fuel-related activities occurring concurrently.

27 **6.4.14.3 Conclusion**

28 Cumulative impacts on waste-management resources include the incremental effects from
29 continued storage when added to the aggregate effects of other past, present, and reasonably
30 foreseeable future actions. The incremental impacts from continued storage on waste-
31 management resources are described in Sections 4.15 and 5.15 and summarized in Table 6-3.
32 In addition, past, present, and reasonably foreseeable Federal and non-federal activities
33 described in Sections 6.3.1 and 6.3.2.2, spread across the geographic area of interest (national
34 scale) are SMALL to LARGE for LLW and mixed waste because local, regional, or national
35 waste-management resources might experience minor to destabilizing decreases in their
36 capacity. For nonradioactive waste, the cumulative impacts from other past, present, and
37 reasonably foreseeable Federal and non-federal activities spread across the geographic area of
38 interest (area surrounding an at-reactor or away-from-reactor spent fuel storage facility) would

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1 be SMALL to LARGE. A SMALL impact would occur if local, regional, or national waste-
2 management facilities experience no noticeable decreases in their capacity or operating lifespan
3 from continued storage or other Federal or non-federal activities. A MODERATE impact would
4 occur if local, regional, or national waste-management facilities experience noticeable
5 decreases in their capacity or operating lifespan. A LARGE impact would occur in the unlikely
6 event that available LLW or nonradioactive waste disposal capacity decreases and LLW or
7 nonradioactive waste generation increases as a result of multiple other NRC-regulated or spent
8 fuel-related activities occurring concurrently. The NRC determined that these cumulative
9 impacts (ranging from SMALL to LARGE) could increase as a result of continued storage of
10 spent fuel because the incremental impacts from continued storage would range from minor to
11 noticeable, which could increase a SMALL cumulative impact to a MODERATE cumulative
12 impact or a MODERATE cumulative impact to a LARGE cumulative impact.

13 **6.4.15 Transportation**

14 This section evaluates the effects of continued storage on transportation when added to the
15 aggregate effects of other past, present, and reasonably foreseeable future actions. As
16 described in Sections 4.16 and 5.16, the incremental impacts from continued storage on
17 nonradiological transportation are SMALL for all timeframes at at-reactor facilities and SMALL to
18 MODERATE at away-from-reactor ISFSIs. The radiological transportation impacts for at-reactor
19 and away-from-reactor continued storage activities are SMALL.

20 The geographic area considered in the cumulative transportation analysis includes the site of
21 the power plant and at-reactor ISFSI, the site of an away-from-reactor ISFSI, and the local,
22 regional, and national transportation networks and populations that use or live along these
23 networks.

24 **6.4.15.1 Potential Cumulative Impacts from General Trends and Activities**

25 Cumulative transportation impacts involve (1) nonradiological impacts, such as increased traffic
26 (e.g., commuting workers and construction materials) and associated increases in accident
27 risks, injuries, and fatalities and (2) radiological impacts, such as radiation doses from the
28 shipment of radioactive materials including unirradiated fuel, spent fuel, and waste materials
29 (NRC 2011a–e, 2012a, 2013a,b). Traffic impacts can accumulate from multiple actions
30 occurring during the same time period (e.g., overlapping construction projects). Principal
31 contributors to localized traffic that could overlap with storage facility construction and
32 operations include the construction of other energy, water, military, or urbanization projects.
33 Radiation dose impacts can accumulate from multiple shipping activities that overlap during the
34 same time period or from single or multiple shipping actions that occur over time on the same
35 routes. Actions involving shipment of radioactive materials for medical, industrial, research, or
36 other energy projects could also overlap with reactor radioactive material shipment impacts
37 (NRC 2011a,c,d).

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1 The magnitude of cumulative impacts resulting from general trends taking place within the
2 region in which a storage facility is located would depend on the nature and location of the
3 actions relative to the storage facility transportation activities. For nonradiological transportation
4 impacts, the cumulative impacts from general trends and activities would range from minimal
5 (e.g., no overlap in traffic with any other development project, see cumulative operational traffic
6 impacts in NRC 2011d) to noticeable (e.g., traffic congestion at specific sites and on roads with
7 limited available capacity to accommodate the increased demand from proposed power plant
8 activities, see NRC 2012a). For radiological transportation impacts, the cumulative impacts
9 would likely be minimal based on low dose, prior generic impact assessment in 10 CFR 51.52
10 (spent fuel, LLW), updated supplemental analyses addressing unique site-specific plant
11 characteristics, and the low volume of other regional radioactive materials transportation
12 activities that could overlap with continued storage (NRC 2011a–e, 2013c).

13 **6.4.15.2 Potential Cumulative Impacts from Other NRC-Regulated or Spent Fuel-Related** 14 **Activities**

15 Cumulative impacts on transportation could result from other NRC-regulated or spent fuel-
16 related activities, such as increases in traffic from workers during final reactor shutdown
17 activities; decommissioning of the reactor power block (including the spent fuel pool), ISFSIs,
18 and DTS; and transportation of spent fuel from an at-reactor or away-from-reactor ISFSI to a
19 repository for disposal.

20 Nonradiological traffic impacts from reactor shutdown activities would result from a temporary
21 increase in the reactor workforce; however, the number of workers would not be expected to
22 exceed the temporary workforce used for refueling outages. Therefore, the traffic impacts
23 during shutdown would be similar to the traffic impacts during reactor operations. Traffic
24 impacts during shutdown were evaluated in the License Renewal GEIS in which the NRC
25 (2013a) determined traffic impacts to be SMALL for operating plants. Combined nonradiological
26 and radiological traffic impacts from reactor decommissioning were previously evaluated by the
27 NRC in the Decommissioning GEIS for nuclear reactors (NRC 2002). In that analysis, the NRC
28 evaluated the number of shipments of dismantled equipment, material, and debris from
29 decommissioning. Although the number of shipments can be relatively large, the
30 decommissioning period extends over several years. As a result, the number of LLW shipments
31 per day is low, with an average of less than one shipment per day from the plant (NRC 2002).
32 The materials transported offsite would include all wastes generated onsite. Nonradiological
33 impacts would include increased traffic volume, additional wear and tear on roadways, and
34 potential traffic accidents (NRC 2002). This information supported a conclusion that the
35 transportation impacts from nuclear power plant decommissioning would not be detectable
36 (NRC 2002).

37 Additional radiological impacts would occur from transportation of (1) spent fuel to a repository
38 for disposal and (2) LLW from decommissioning the reactor, spent fuel pool, and ISFSI.

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1 Radiological impacts would include exposure of transportation workers and the general public
2 along the transportation routes. The NRC previously determined that radiological impacts on
3 the public and workers of spent fuel and waste shipments from a reactor are SMALL in several
4 evaluations. For example, the NRC made a generic impact determination in Table S–4 in
5 10 CFR 51.52 ~~that the environmental impacts of incident free transportation of fuel and waste to~~
6 ~~and from a light water reactor would be SMALL if the conditions in 10 CFR 51.52~~ and the
7 supporting analysis (AEC 1972) that the environmental impacts of transportation of fuel and
8 waste to and from a 1,000- to 1,500-MW(e) light water reactor would be SMALL under ~~both~~
9 incident-free and accident conditions. Additional site-specific analyses of transportation impacts
10 for power plants that did not meet the conditions of 10 CFR 51.52 also concluded the
11 transportation radiological impacts would be SMALL (NRC 2006, 2008, 2011a–f). In the
12 License Renewal GEIS (NRC 2013a), the NRC also concluded that impacts from uranium fuel
13 cycle transportation, including transportation of spent fuel to a repository for disposal, are
14 SMALL for all nuclear plants. The results of subsequent analyses of transportation impacts in
15 “Final Environmental Statement on Transportation of Radioactive Material by Air and Other
16 Modes (NRC 1977) and Reexamination of Spent Fuel Shipment Risk Estimates” (Sprung et al.
17 2000) confirmed spent fuel transportation impacts are small. More recently, the NRC calculated
18 spent fuel transportation risks for individual shipments in “Spent Fuel Transportation Risk
19 Assessment: Draft Report for Comment” (NRC 2012e) based on current models, data, and
20 assumptions. The analysis modeled responses of shipping casks to accident conditions such
21 as impact force and fire, and calculated risks considering a range of truck and rail accidents of
22 different severities including those involving no release or loss of shielding, loss of shielding
23 only, or loss of shielding and release. That analysis reconfirmed that the radiological impacts
24 from spent fuel transportation conducted in compliance with NRC regulations are low. The NRC
25 also concluded that the regulations for transportation of radioactive material were adequate to
26 protect the public against unreasonable risk (NRC 2012e). Based on the generic determination
27 in Table S–4 of 10 CFR 51.52 and the subsequent spent fuel transportation impact analyses
28 and risk assessments cited above, the NRC concludes the radiological impacts for incident-free
29 and accident transportation of spent fuel from a single at-reactor storage facility to a repository
30 would be small.

31 Radiological impacts may accumulate along the transportation route for an away-from-reactor
32 ISFSI because the same overall transportation route would be used to transfer the entire
33 inventory of spent fuel from an away-from-reactor ISFSI to a repository. To evaluate these
34 impacts from an away-from-reactor ISFSI, the NRC reviewed other past evaluations of
35 transportation of spent fuel from an away-from-reactor ISFSI to a repository. For example, the
36 NRC previously evaluated the radiological and nonradiological impacts from a comparable (full
37 inventory) transportation scenario for an away-from-reactor ISFSI (PFSF) and concluded that
38 the impacts would be SMALL (NRC 2001a). That analysis calculated incident-free and accident
39 risks from 4,000 shipments of spent fuel from Maine to Utah over a 20-year period. The
40 resulting cumulative dose to the maximally exposed individual (an individual that is assumed for

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1 the purpose of bounding analysis for incident-free transportation to be exposed to the radiation
2 from all shipments) at the end of the 20-year period was 0.022 mSv (2.2 mrem). For
3 comparison, the annual NRC public dose limit in 10 CFR Part 20 is 1 mSv (100 mrem). The
4 NRC (2001a) also concluded that the radiological impacts from transportation of a single
5 reactor's spent fuel from an away-from-reactor ISFSI to a repository would be bounded by, or
6 comparable to, impacts evaluated in Table S-4 in 10 CFR 51.52. Based on these analyses,
7 the NRC concludes that the additional accumulated impacts from transportation of the entire
8 inventory of spent fuel from an away-from-reactor ISFSI to a repository would be minor.

9 **6.4.15.3 Conclusion**

10 Cumulative impacts on transportation include the incremental effects from continued storage
11 when added to the aggregate effects of other past, present, and reasonably foreseeable future
12 actions. As described in Sections 4.16 and 5.16, the incremental impacts from continued
13 storage on transportation is SMALL for all timeframes at an at-reactor ISFSI and SMALL to
14 MODERATE for all timeframes at an away-from-reactor ISFSI. In addition, past, present, and
15 reasonably foreseeable activities take place in the geographic area of interest that could
16 contribute to cumulative effects to transportation. The cumulative impacts from continued
17 storage when added to other past, present, and reasonably foreseeable Federal and non-
18 federal activities (such as construction of energy, water, military, or urbanization projects) would
19 range from SMALL to MODERATE for nonradiological transportation and SMALL for
20 radiological transportation.

21 **6.4.16 Public and Occupational Health**

22 This section evaluates the effects of continued storage on public and occupational health when
23 added to the aggregate effects of other past, present, and reasonably foreseeable future
24 actions. As described in Sections 4.17 and 5.17, the incremental impacts from continued
25 storage on public and occupational health is SMALL for all timeframes at both at-reactor and
26 away-from-reactor storage facilities.

27 For this analysis, the geographic area considered in the cumulative public and occupational
28 health resources analysis is the area within a 80-km (50-mi) radius of the at-reactor or away-
29 from-reactor storage facility site. Historically, the NRC has used the 80-km (50-mi) radius as a
30 standard geographic area to evaluate population doses from routine releases from nuclear
31 power plants. The 80-km (50-mi) radius was selected to encompass potential impact overlaps
32 from two or more nuclear facilities. This concept is discussed in detail in the site-specific EISs
33 for new reactors and ISFSI EAs or EISs reviewed for this draft GEIS analysis (see e.g., NRC
34 2011d, Section 6.8).

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1 **6.4.16.1 Potential Cumulative Impacts from General Trends and Activities**

2 Cumulative human health impacts relate to public exposure to radiological, chemical, and
3 microbiological hazards and the potentially chronic effects of electromagnetic field (EMF)
4 exposure. Public exposures may occur as a result of environmental accumulations of harmful
5 constituents released from various facilities associated with urban, agricultural, industrial, and
6 commercial development. The potential cumulative impacts of EMF exposure, while uncertain,
7 would relate to activities (e.g., transmission lines and substations) associated with urban,
8 industrial, and commercial development. The NRC acknowledges that there is no conclusive
9 link between EMF exposure and human health impacts (NRC 2013a).

10 The magnitude of cumulative impacts resulting from general trends taking place within the
11 region in which a storage facility is located would depend on the nature and location of the
12 actions, the number of actions (facilities or projects), the level of the public's exposure, and
13 whether facilities comply with regulating agency requirements (e.g., permitted discharge limits).
14 For public and occupational health, the cumulative impact would be minimal (e.g. NRC 2011a–f,
15 2012a, 2013a,b) because reactors and other industrial buildings would be required to meet
16 regulations such as the Occupational Safety and Health Administration's General Industry
17 Standards (29 CFR Part 1910) and Construction Industry Standards (29 CFR Part 1926) and,
18 as applicable, operated under NRC regulations such as 10 CFR Part 72 and 10 CFR Part 20.
19 For example, even though increased urbanization might suggest an increased public exposure
20 because of a larger receptor group, the NRC would still require the regulated nuclear facilities in
21 the area of interest to prove through monitoring and as low as reasonably achievable (ALARA)
22 programs that they were meeting the public and occupational health regulations.

23 **6.4.16.2 Potential Cumulative Impacts from Other NRC-Regulated or Spent Fuel-Related**
24 **Activities**

25 Cumulative impacts on public and occupational health could result from other NRC-regulated or
26 spent fuel-related activities, such as reactor plant shutdown activities prior to decommissioning,
27 decommissioning activities, construction of infrastructure to support away-from-reactor ISFSIs,
28 and preparation activities to enable transportation of waste to a repository. Decommissioning
29 and preparation for decommissioning are regulated activities that are conducted through the
30 NRC-approved decommissioning plans. The NRC has evaluated environmental impacts from
31 these activities in the Decommissioning GEIS (NRC 2002) for reactor decommissioning and the
32 PFSF EIS (NRC 2001a) for ISFSI decommissioning and found the public and occupational
33 health impacts to be SMALL. The NRC also evaluated environmental impacts from
34 infrastructure to support away-from-reactor ISFSIs in the PFSF EIS (NRC 2001a) and found the
35 public and occupational health impacts to be SMALL. For activities related to spent fuel
36 transportation to a repository, such as spent fuel storage maintenance activities that involve
37 bare fuel handling in a postulated dry transfer facility at nearby facilities, as noted in
38 Sections 4.17 and 5.17, the public and occupational health impacts would be SMALL, and

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1 would not aggregate to more significant impacts, given the limited number of facilities within
2 80 km (50 mi) expected to be in the decommissioning phase of their lifecycle.

3 **6.4.16.3 Conclusion**

4 Cumulative impacts on public and occupational health include the incremental effects from
5 continued storage when added to the aggregate effects of other past, present, and reasonably
6 foreseeable future actions. As described in Sections 4.17 and 5.17, the incremental impacts
7 from continued storage on public and occupational health is SMALL for all timeframes at both
8 at-reactor and away-from-reactor storage facilities. The cumulative impacts from continued
9 storage when added to other past, present, and reasonably foreseeable Federal and non-
10 federal activities are expected to be SMALL because storage facilities, reactors, and other
11 proposed industrial buildings would be required to meet regulations such as the Occupational
12 Safety and Health Administration's General Industry Standards (29 CFR Part 1910) and
13 Construction Industry Standards (29 CFR Part 1926) and, as applicable, operated under NRC
14 regulations such as 10 CFR Part 72 and 10 CFR Part 20.

15 **6.4.17 Environmental Impacts of Postulated Accidents**

16 This section evaluates the effects of continued storage on accident risk when added to the
17 aggregate effects of other past, present, and reasonably foreseeable future actions. As
18 described in Sections 4.18 and 5.18, the incremental impacts from continued storage on
19 environmental impacts of postulated accidents is SMALL for all timeframes at both at-reactor
20 and away-from-reactor storage facilities.

21 The geographic area considered in the cumulative accident risk assessment is a 80-km (50-mi)
22 radius from an at-reactor or away-from-reactor storage facility. The cumulative analysis
23 considers risk from potential accidents from other nuclear plants or storage facilities that have
24 the potential to increase risks at any location within 80 km (50 mi) of the shutdown reactor or
25 storage facility. It is possible that one or more other types of nuclear facilities that support the
26 nuclear fuel cycle may be located within a 80-km (50-mi) radius, but these facilities generally
27 involve very low accident risk (51 FR 30028). Therefore, the analysis below focuses on the
28 cumulative risk from reactors and storage facilities.

29 **6.4.17.1 Potential Cumulative Impacts from General Trends and Activities**

30 Based on a review of the other activities that can occur near proposed new at-reactor storage
31 facilities, there are two scales of cumulative impacts on accident risk, including (1) cumulative
32 impacts due to the various impacts from an individual power plant and storage facility over time
33 (e.g., annual design basis and severe accident risks at a reactor), and (2) cumulative impacts
34 due to closely sited operating or decommissioning reactors (e.g., design basis and severe
35 accident risks at other reactors located within 80 km [50-mi]) or other radioactive facilities. In

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1 addition, climate change can impact accident risk due to higher or lower intensity or frequency
2 of natural phenomena hazards (e.g., precipitation, tornadoes, hurricanes) that result in
3 radiological accidents.

4 The magnitude of cumulative accident impacts resulting from all general trends taking place
5 within the 80-km (50-mi) region of a power plant and storage facility would likely be limited
6 because:

- 7 1. Estimates of average individual early fatality and latent cancer fatality risks are well below
8 the Commission's safety goals at all plants (51 FR 30028).
- 9 2. The Commission has determined that the probability-weighted consequences of severe
10 accidents of a nuclear power plant are SMALL (10 CFR Part 51, Appendix B, Table B-1).
- 11 3. The severe accident risk due to any particular nuclear power plant gets smaller as the
12 distance from that plant increases. However, the combined risk at any location within 80 km
13 (50 mi) of a reactor site would be bounded by the sum of risks for all of these operating and
14 proposed nuclear power plants. Even though several plants and other nuclear facilities
15 could potentially be included in the combination, this combined risk would still be low.

16 Because design basis accidents at nearby power plants and storage facilities are individually
17 unlikely to occur more than once over the life of a facility, and licensees must show that accident
18 consequences of design basis accidents are mitigated to acceptable levels of dose offsite, the
19 cumulative impact of design basis accidents is very small. Based on the above discussion, the
20 NRC concluded that, in all new reactor EISs published through February 2013 (e.g., NRC
21 2011a–f), the cumulative risks from design basis and severe accidents at any location
22 within 80 km (50 mi) of a reactor would be SMALL.

23 Potential cumulative impacts from an ISFSI or an away-from-reactor storage facility would be
24 minimal because of passive nature of the ISFSI; no gaseous or liquid effluents are released
25 during operation. In addition, because licensees are required to maintain doses as low as is
26 reasonably achievable in accordance with NRC radiation protection regulations, both an ISFSI
27 and an away-from-reactor facility are designed to minimize radiological doses to workers and
28 public. Additionally, the severe accident risk from a spent fuel storage facility also decreases as
29 the distance from that facility increases. On this basis, the NRC concluded that the cumulative
30 risk of continued storage from design basis and severe accidents at an ISFSI or an away-from-
31 reactor storage facility would be SMALL.

32 **6.4.17.2 Potential Cumulative Impacts from Other NRC-Regulated or Spent Fuel-Related** 33 **Activities**

34 Cumulative impacts of postulated accidents could result from other NRC-regulated or spent fuel-
35 related activities, such as spent fuel storage maintenance activities. Activities that involve bare
36 fuel handling in a postulated dry transfer facility at nearby facilities could involve additional

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1 accident risk. However, as noted in Sections 4.18 and 5.18, these impacts would be SMALL,
2 and would not aggregate to more significant impacts, given the limited number of facilities within
3 80 km (50 mi) expected to be in this part of their life cycle.

4 Before spent fuel storage facilities can begin final decommissioning and license termination, the
5 spent fuel must be removed from the site and stored or disposed of offsite. Once the spent fuel
6 is removed from the site, the residual radioactive material at a reactor poses very little accident
7 risk. Therefore, impacts on accident risk from decommissioning are expected to be SMALL
8 (NRC 2002).

9 **6.4.17.3 Conclusion**

10 Cumulative impacts of postulated accidents include the incremental effects from continued
11 storage when added to the aggregate effects of other past, present, and reasonably foreseeable
12 future actions. As described in Sections 4.18 and 5.18, the incremental impacts from continued
13 storage on environmental impacts of postulated accidents is SMALL for all timeframes at both
14 at-reactor and away-from-reactor storage facilities. In addition, past, present, and reasonably
15 foreseeable activities take place in the geographic area of interest that could contribute to
16 cumulative effects to accident risk.

17 The NRC determined that the cumulative impacts from a reactor, a spent fuel pool, and an
18 ISFSI would be minimal because accident risk remains SMALL. The cumulative impacts from
19 other past, present, and reasonably foreseeable Federal and non-federal activities described in
20 Sections 6.3.1 and 6.3.2 are SMALL. Given that estimates of average individual early fatality
21 and latent cancer fatality risks are well below the Commission's safety goals at all nuclear power
22 plants (51 FR 30028), the Commission determination that the probability-weighted
23 consequences of severe accidents of a nuclear power plant are SMALL (10 CFR Part 51,
24 Appendix B, Table B-1), and that the combined risk from several plants and other nuclear
25 facilities would be low, the NRC concludes that the cumulative impacts at all storage sites would
26 be SMALL.

27 **6.5 Summary**

28 The impact levels determined by the NRC in the previous chapters from at-reactor storage
29 (Chapter 4), away-from-reactor storage (Chapter 5), and cumulative impacts from continued
30 storage when added to other past, present, and reasonably foreseeable activities (Chapter 6)
31 are summarized in Table 6-4. The impact levels are denoted as SMALL, MODERATE, and
32 LARGE as a measure of their expected adverse environmental impacts.

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1 **Table 6-4.** Summary of the Cumulative Impacts from Continued Storage When Added to Other
2 Federal and Non-Federal Activities

Resource Area	Incremental Impact from At-Reactor Storage	Incremental Impact from Away-From-Reactor Storage	Cumulative Impact from Continued Storage and other Federal and Non-Federal Activities
Land Use	SMALL	SMALL	SMALL to MODERATE
Socioeconomics	SMALL	SMALL (adverse) to LARGE (beneficial)	SMALL to LARGE
Environmental Justice	No disproportionately high and adverse impacts		
Air Quality	SMALL	SMALL to MODERATE	SMALL to MODERATE
Climate Change	SMALL	SMALL	MODERATE
Geology and Soils	SMALL	SMALL	SMALL to MODERATE
Surface-Water Quality and Use	SMALL	SMALL	SMALL to LARGE
Groundwater Quality and Use	SMALL	SMALL	SMALL to LARGE
Terrestrial Resources	SMALL	SMALL to MODERATE	SMALL to MODERATE
Aquatic Ecology	SMALL	SMALL	SMALL to LARGE
Historic and Cultural Resources	SMALL, MODERATE, or LARGE	SMALL, MODERATE, or LARGE	SMALL, MODERATE, or LARGE
Noise	SMALL	SMALL	SMALL to MODERATE
Aesthetics	SMALL	SMALL to MODERATE	SMALL to MODERATE
Waste Management	SMALL to MODERATE	SMALL to MODERATE	SMALL to LARGE
Transportation	SMALL	SMALL to MODERATE	SMALL to MODERATE
Public and Occupational Health	SMALL	SMALL	SMALL
Accidents	SMALL	SMALL	SMALL

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1 **6.6 References**

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7.0 Cost-Benefit Analysis

In this chapter, the U.S. Nuclear Regulatory Commission (NRC) analyzes and compares the benefits and costs associated with the proposed action, other action alternatives, and the no-action alternative. This chapter, along with the rest of this “Waste Confidence Generic Environmental Impact Statement” (draft GEIS), informs the NRC’s decision regarding which alternative to implement. Each of the action alternatives satisfies the purpose and need for this draft GEIS, which is to (1) improve the efficiency of the NRC’s licensing process by generically addressing the environmental impacts of continued storage, (2) prepare a single document that reflects the NRC’s current understanding of these environmental impacts, and (3) respond to the issues identified in the remand by the Court in the *New York v. NRC* decision (State of New York et al. v. NRC 2012).

Each alternative provides a means for the NRC to address, in its environmental review documents, the environmental impacts of continued spent fuel storage (continued storage) at a reactor site or at an away-from-reactor storage facility. In Chapters 4 and 5 of this draft GEIS, the NRC discusses the potential impacts of continued at-reactor and away-from-reactor storage, respectively, that may occur under three different continued-storage timeframes. In Chapter 6, the NRC addresses the potential cumulative impacts of continued storage.

The alternatives considered in this chapter do not noticeably alter the environmental impacts from continued storage that the NRC addressed in Chapters 4, 5, and 6. The alternatives considered in this chapter instead provide different approaches that the NRC could apply to future licensing activities that can satisfy the agency’s responsibility to consider the potential environmental impacts of continued storage in deciding whether to issue certain licenses. As a result, the costs and benefits shown in this chapter include the specific costs and benefits of the several alternatives. The costs and benefits do not include the environmental impacts of continued storage, an activity that will occur regardless of the alternative that the NRC selects to consider its impacts.

Section 7.1 of this chapter contains the assumptions underlying the NRC’s cost-benefit analysis. Section 7.2 contains the costs and benefits of the no-action alternative, while Section 7.3 contains the costs and benefits of the proposed action. Section 7.4 contains the costs and benefits of the GEIS-only alternative, and Section 7.5 contains the costs and benefits of the policy-statement alternative. Finally, Section 7.6 contains a summary and comparison of the costs and benefits of all alternatives. Additional details about the NRC’s estimated cost calculations are available in Appendix H, Estimated Cost of Alternatives.

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Cost-Benefit Analysis

1 **7.1 Assumptions**

2 Throughout this chapter, the NRC projects the estimated costs and benefits of alternative ways
3 the agency can consider the environmental impacts of continued storage. To the extent that the
4 NRC considers cost information, the NRC presents figures in constant 2013 dollars and by
5 applying 3 percent and 7 percent discount rates, as provided in Office of Management and
6 Budget (OMB) Circular A–4 (OMB 2003) and NUREG/BR–0058, Revision 4, “Regulatory
7 Analysis Guidelines for the U.S. Nuclear Regulatory Commission” (NRC 2004).

8 In this analysis, the NRC projects the costs of each alternative from fiscal year 2015 (October
9 2014 through September 2015) through fiscal year 2044 (October 2043 through September
10 2044). The NRC adopted this 30-year time period based on the example provided in OMB
11 Circular A–4 and based on the approximate cumulative time period for which previous versions
12 of the Waste Confidence rule (Title 10 of the *Code of Federal Regulations* Section 51.23
13 [10 CFR 51.23]) have existed. The 30-year time period allows for meaningful comparisons
14 among alternatives. The 30-year time period begins in the month after the Waste Confidence
15 rulemaking is currently scheduled for completion.

16 The NRC made reasonable assumptions for current and future licensing reviews that inform the
17 NRC’s cost estimates. This analysis considers site-specific licensing reviews over 30 years that
18 would rely on 10 CFR 51.23 to address the environmental impacts of continued storage. All
19 assumptions related to NRC costs for continued storage include costs associated with the
20 additional NRC efforts on National Environmental Policy Act of 1969, as amended (NEPA)
21 reviews as well as NRC participation in adjudicatory hearings, as appropriate.

22 The draft GEIS assumptions are based in part on NRC projections of current and likely licensing
23 reviews (see, for example, SECY–12–0132 for a list of applications currently under review or
24 projected through the end of 2014 [NRC 2012a]). The assumptions address three important
25 licensing actions: new reactor applications (pursuant to 10 CFR Part 50 or Part 52), reactor
26 license renewal applications (pursuant to 10 CFR Part 54), and site-specific independent spent
27 fuel storage installations (ISFSI) applications (pursuant to 10 CFR Part 72).

28 The NRC assumes that applicants for new or renewed licenses affected by the Waste
29 Confidence rule would incur costs in the absence of a Waste Confidence rule equal to those the
30 NRC incurs in addressing the impacts of continued storage. As a result, the total costs for site-
31 specific reviews are double the NRC’s costs discussed in this chapter. Quantified totals in the
32 tables in this chapter include industry costs. The NRC assumes that applicants will incur
33 additional costs by developing applications that address the environmental impacts of continued
34 storage, responding to the NRC’s requests for additional information related to continued
35 storage, and participating in any adjudicatory proceedings related to continued storage.

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1 The NRC calculated its estimated costs based on anticipated staff time—measured in full-time
2 equivalents, or FTEs—and anticipated contractor effort, where applicable, measured in contract
3 dollars. The average cost for one NRC staff FTE is \$173,000 per year, which is based on the
4 methodology provided in NUREG/CR-4627, “Generic Cost Estimates” (Sciacca 1992). The
5 NRC’s estimates of potential licensing actions and associated cost calculations are available in
6 Appendix H, Estimated Costs of Alternatives.

7 **7.1.1 New Reactor Applications**

8 The NRC is currently reviewing nine combined license (COL) applications and one early site
9 permit (ESP) application (see Appendix H, Table H-1, for a list of applications).¹ In reviewing
10 each COL and ESP application, the NRC develops a site-specific environmental impact
11 statement (EIS) that addresses the potential environmental impacts of the proposed facility.
12 The NRC assumes that the first site-specific review of the environmental impacts of continued
13 storage would require more time and effort than subsequent reviews, because the first
14 application would be developed with a general approach that could then be used in subsequent
15 application reviews.

16 In general, COL and ESP application reviews take longer and require more staff effort to
17 complete than other NRC reviews that rely on the Waste Confidence rule. Among other factors,
18 COL and ESP applications frequently include cooperating agencies, while COL proceedings
19 additionally require mandatory hearings prior to a Commission decision on an application. The
20 NRC estimates that the first site-specific review of continued storage in a COL EIS supplement²
21 would require approximately 3.9 FTEs, or \$675,000, and \$1 million in contractor support (total of
22 \$1.67 million), based on staff experience supplementing COL EISs. The NRC estimates that

¹ One of the COL applications currently under review, Calvert Cliffs Unit 3, is subject to substantial uncertainty. An NRC Atomic Safety and Licensing Board (ASLB) found that the plant’s applicants are ineligible to receive a COL because the applicants are wholly owned by a foreign company, in violation of Commission policy based on Section 103d of the Atomic Energy Act (LBP-12-19). On March 11, 2013, the Commission denied the applicants’ appeal of the ASLB’s decision (CLI-13-04) (NRC 2013a). The applicants have stated that they intend to find a domestic co-owner for the proposed facility. For the purposes of this analysis, however, the NRC has retained the Calvert Cliffs Unit 3 COL application.

² Under 10 CFR 51.92(a), the NRC prepares a supplement to a final EIS when a proposed action has not yet been taken, but there are either substantial changes in the proposed action that are relevant to environmental concerns or there are new and significant circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts. For the first three new-reactor reviews, the NRC anticipates that it would supplement final EISs. The supplementation process includes development of a draft supplemental EIS, publication of the draft supplemental EIS, an opportunity for public comments on the draft, NRC efforts to consider and resolve comments, and publication of a final supplemental EIS. This process generally duplicates costs already incurred in a standard EIS process. During the supplementation process, applicants may incur expenses when they develop supplements to existing applications, when they respond to NRC requests for additional information, and when they participate in adjudicatory proceedings related to issues raised during the supplemental EIS process.

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Cost-Benefit Analysis

1 the next two reviews will require supplementation of existing EISs at a cost of approximately
2 2.9 FTEs, or \$502,000, and \$500,000 in contract support (a total of \$1.00 million) each. The
3 NRC estimates that the remaining new reactor reviews, which do not require supplementation,
4 will require 0.3 FTE, or \$51,900.³ See Appendix H, Table H-1, in for new reactor cost
5 calculations.

6 As noted in Chapter 2 of this draft GEIS, the NRC is currently engaged in preapplication
7 activities with several applicants for light water small modular reactors. Because the light water
8 reactor fuel that would be used in iPWR (integral pressurized water reactors; a type of small
9 modular reactor) designs is substantially similar to existing light water reactor fuel (i.e., zircaloy
10 clad, low-enriched uranium oxide pellets in square cross-section fuel rod arrays), iPWR fuel is
11 within the scope of the draft GEIS analysis. The NRC expects to receive applications for NRC
12 review and approval of small modular designs pursuant to 10 CFR Part 52 as early as 2013
13 (NRC 2013b), but there is no current plan for the NRC to receive or begin review of applications
14 for specific small modular reactor power plants.

15 Design certification reviews for iPWRs would not require assessments of the impacts of
16 continued storage, but licensing reviews for specific sites would require such assessments. At
17 the time of this draft GEIS publication, only one licensee, the Tennessee Valley Authority (TVA),
18 has expressed an interest in pursuing construction permits pursuant to 10 CFR Part 50 for two
19 to six small modular reactors, with potential subsequent units licensed pursuant to 10 CFR
20 Part 52 (NRC 2013c). In 2011, TVA informed the NRC of its intent to submit a construction
21 permit application in 2012 (TVA 2011), but TVA has not submitted such an application as of the
22 draft GEIS publication date.

23 As a result of the substantial uncertainties associated with future small modular reactor licensing
24 reviews, the NRC has not included any small modular reactors in its cost projections. Beyond
25 the uncertainty related to applications, there is some uncertainty about review costs for small
26 modular reactor applications. It is reasonable to assume, however, that the effort necessary to
27 address the environmental impacts of continued storage for small modular reactors will be similar
28 to the effort necessary to address the environmental impacts of continued storage for other new
29 reactor applications. If applicants develop and submit applications for small modular reactors to
30 the NRC, then each additional review activity would require an estimated 0.3 FTE, or \$51,900.

³ An additional facility, Watts Bar Nuclear Plant, Unit 2, is a proposed new reactor currently undergoing an operating license review under 10 CFR Part 50. The NRC projects that Watts Bar Nuclear Plant, Unit 2 would require approximately 1.4 FTEs and no contractor support for a review of environmental impacts of continued storage, for a total cost of \$242,000. The approach and format for the Watts Bar Nuclear Plant, Unit 2 EIS (NRC 2011) is substantially similar to EISs developed for reactor license renewal, so the cost projection is the same as the projection applied to plants undergoing license renewal reviews that require EIS supplementation.

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1 **7.1.2 Reactor License Renewal**

2 The NRC currently has 10 reactor license renewals under review (see Appendix H, Table H-2,
3 for a list of applications). An approved license renewal may add up to 20 years of additional
4 operation to an existing commercial power reactor license (10 CFR 54.31(b)).

5 In the course of reviewing a license renewal application, the NRC prepares a site-specific
6 supplement to the GEIS for License Renewal of Nuclear Plants (License Renewal GEIS, or
7 NUREG-1437). A supplemental EIS for license renewal requires less time and effort than a
8 COL or ESP EIS⁴; because the License Renewal GEIS has already addressed many
9 environmental issues⁴, the plant under review has typically been operating at the site for at
10 least 20 years (avoiding the need for a review of alternative sites for the proposed renewal) and
11 its effects on the environment tend to be well understood⁴, and because license renewal
12 typically involves no new construction. In addition, license renewal EISs typically do not include
13 cooperating agencies and do not require mandatory hearings.

14 The NRC projects that the first site-specific review of continued storage in a supplemental EIS
15 for license renewal would require more time and effort than subsequent reviews in order to
16 develop a general approach that subsequent reviews would then use. The first review would
17 require an estimated 2.5 FTEs, or \$433,000 based on NRC experience supplementing license
18 renewal EISs. The NRC further projects that some reviews would require supplementation of
19 existing EISs, and these reviews would require approximately 1.4 FTEs, or \$242,000. Reviews
20 that have already begun but that do not require supplementation would require approximately
21 1.1 FTEs, or \$190,000. Reviews of applications that have not yet been submitted would require
22 approximately 0.3 FTE, or \$51,900, or the same amount of effort as new reactor reviews that do
23 not require supplementation. In addition to reviews already received, the NRC projects that all
24 plants that have yet to apply for license renewal would apply for renewal by 2020 for purposes
25 of this analysis (NRC 2013d).⁴ See Appendix H, Table H-2, for license renewal cost
26 calculations.

27 Further, the NRC assumes that approximately half of the existing reactor fleet will apply for
28 subsequent license renewal (which could allow plants to operate for up to 80 years) beginning in
29 2017. The NRC estimates that it will review a total of 28 applications—or one application per
30

⁴ Watts Bar Nuclear Plant, Unit 1 is the only unit licensed under 10 CFR Part 50 that does not have a renewed license because it is not yet eligible to request renewal. The NRC assumes that this facility will undergo a license renewal review for purposes of this analysis.

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1 year—from 2017 through the end of 2044.⁵ The NRC assumes that the continued storage
2 portion of these NEPA reviews will be substantially similar to the reviews performed during the
3 initial license renewal review. The NRC estimates that subsequent license renewal reviews will
4 require an estimated 0.3 FTE, or \$51,900.

5 **7.1.3 ISFSI Licensing**

6 Currently, 15 sites possess site-specific ISFSI licenses (NRC 2013e), and one potential
7 applicant has expressed an interest in licensing a new away-from-reactor ISFSI (ELEA 2013).⁶
8 The majority of existing ISFSIs, however, are generally licensed. The NRC does not perform a
9 site-specific renewal review for generally licensed ISFSIs; rather, historically, the NRC has
10 performed an environmental assessment (EA) (with a finding of no significant impact [FONSI])
11 for each available cask design, and the facilities' ability to possess nuclear materials is subject
12 to its 10 CFR Part 50 (or 10 CFR Part 52) license. As a result, the NRC assumes, for purposes
13 of this analysis, that there are no costs associated with general ISFSI licensing related to
14 considering the environmental impacts of continued storage during the 30-year analysis period.

15 The licensed term for a site-specific licensed ISFSI must not exceed 40 years
16 (10 CFR 72.42(a)). During site-specific ISFSI licensing (new licenses and license renewals),
17 the NRC typically develops an EA that concludes with a FONSI. To date, every site-specific
18 ISFSI EA has reached a FONSI.

19 The NRC estimates that approximately 0.5 FTE, or \$86,500, is necessary to support site-
20 specific considerations of Waste Confidence matters in the first two ISFSI EAs, both of which
21 are currently under review. The NRC estimates that later ISFSI EAs will require 0.25 FTE, or
22 \$43,300. See Appendix H, Table H-3, for ISFSI-related cost calculations and a list of affected
23 actions.

⁵ Commercial nuclear power plant licensees typically apply for license renewal for all reactors at a site at the same time. There are currently 61 sites that host commercial power reactors with 10 CFR Part 50 operating licenses or both 10 CFR Part 50 operating licenses and 10 CFR Part 52 combined licenses. Of these sites, licensees have indicated that they will cease nuclear operations at three of them (Kewaunee, Crystal River, and Oyster Creek). Of the remaining 58 sites, licensees at three sites could apply for license renewal after 2044 and still submit timely renewal applications (Comanche Peak Units 1 and 2, Seabrook, and Watts Bar Nuclear Plant, Unit 1). Because the NRC assumes that approximately half of the licensees will apply for initial or subsequent license renewal, the NRC includes 28 initial or subsequent-renewal reviews in this analysis. The analysis does not prejudge the outcome of any pending or future license renewal review; rather it addresses the potential cost implications of potential subsequent renewals.

⁶ Private Fuel Storage (PFS)—an away-from-reactor facility—holds a site-specific license, but has not taken delivery of spent fuel, and has recently requested that the NRC terminate its license (PFS 2012). The NRC has retained PFS in this analysis, to represent a future away-from-reactor facility.

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7.2 Estimated Costs and Benefits of the No-Action Alternative

Under the no-action alternative, the NRC would neither implement a new Waste Confidence rule supported by a GEIS nor would it implement any other alternative considered in this draft GEIS. The NRC would review the generic environmental impacts from continued storage in licensing-specific NEPA reviews that the NRC performs for new reactor licensing, reactor license renewal, ISFSI licensing, and ISFSI license renewal (see Appendix H, Table H-1, Table H-2, and Table H-3 for affected actions and their respective estimated costs). The NRC and license applicants incur the majority of the costs from the no-action alternative. Costs also accrue through NRC adjudicatory activities, which affect the NRC, license applicants, and petitioners or interveners. In general, expenses to petitioners are case-specific and difficult to quantify, so the NRC has not quantified them here. Table 7-1 contains cost estimates for the no-action alternative based on the detailed information presented in Appendix H.

Table 7-1. Constant and Discounted Estimated Costs of the No-Action Alternative

Components ^(a)	Estimated Costs (millions of dollars)		
	Constant Dollars	3% Discount Case	7% Discount Case
Site-Specific Review Costs	\$24.3	\$21.4	\$18.6
GEIS Costs	-	-	-
Rulemaking Costs	-	-	-
Policy Statement Costs	-	-	-
Estimated Total Cost	\$24.3	\$21.4	\$18.6

(a) Table 7-1, Table 7-2, Table 7-3, and Table 7-4 contain line items for site-specific review costs, GEIS costs, rulemaking costs, and policy statement costs. Here, the no-action alternative does not include a GEIS, rulemaking, or a policy statement, so the NRC includes no costs for those components in Table 7-1. The NRC populates subsequent tables according to the components included in each subsequent alternative.

The primary quantifiable benefit of the no-action alternative is that the NRC would not need to prepare a GEIS and rule or a policy statement. In addition, there is a public-perception benefit from the NRC's reviewing the environmental impacts of continued storage in site-specific licensing actions. In a site-specific NEPA analysis, the NRC would describe location-specific conditions, address the site-specific impacts of a potential licensing action, and address the impacts of continued storage. The value of reviewing continued storage in site-specific NEPA analyses is difficult to quantify; however, a site-specific analysis of the environmental impacts of continued storage would likely not reveal any new information that cannot be addressed in a generic analysis.

Another cost of the no-action alternative relates to increased scheduling uncertainties in licensing due to additional environmental reviews and potential increased litigation associated

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1 with continued storage. The effects of schedule uncertainties are likely to be most significant for
2 new reactor or new site-specific ISFSI applicants. Delays can be more costly for new reactor
3 applicants, which could incur billions of dollars of additional expenses if a project is delayed.
4 These costs can include increased financing costs, longer-term accumulation of interest on
5 debt, replacement-power costs, and contractual penalties. Because these costs are highly
6 case-specific, the NRC has not attempted to quantify them.

7 Applicants for renewed reactor and site-specific ISFSI licenses that submit timely and sufficient
8 renewal applications are protected from schedule uncertainty, at least insofar as continued
9 operations are concerned, by 10 CFR 2.109. Specifically, 10 CFR 2.109 allows for operations
10 of reactors and ISFSIs until such applications have been finally determined, even if final
11 determination takes place after the license expiration date. Nonetheless, delays may affect
12 applicants' plans to commence activities that may depend upon renewed licenses. Because
13 these types of expenses vary significantly and are case-specific, the NRC has not attempted to
14 quantify them.

15 **7.3 Estimated Costs and Benefits of the Proposed Action**

16 In the proposed action, the NRC implements a regulatory approach that includes an update to
17 the Waste Confidence rule, 10 CFR 51.23, that codifies the results of this draft GEIS. The
18 update would clarify that, because the impacts of continued storage have been generically
19 assessed in a GEIS and codified in a rule, the NEPA analyses for future reactor and spent fuel
20 storage facility licensing actions would not need to independently consider the environmental
21 impacts of continued storage. The Rule also serves to preclude any challenge to the NRC's
22 assessment of the environmental impacts of continued storage in a site-specific licensing action,
23 unless a petitioner can show that sufficient "special circumstances" exist to justify waiving
24 10 CFR 51.23 in a particular proceeding (10 CFR 2.335).

25 The primary benefit of the proposed action is that it eliminates the costs associated with site-
26 specific licensing reviews of issues related to the environmental impacts of continued storage.⁷
27 In addition, this approach is generally consistent with Council on Environmental Quality (CEQ)
28 guidance regarding efficiency and timeliness under NEPA (77 FR 14473).

29 As shown in Table 7-2, preparation of the GEIS and Rule incurs costs not incurred under the
30 no-action alternative. The NRC estimates that the proposed action will require approximately
31 23 FTEs, or \$3.98 million, in each of 2013 and 2014, or \$8 million total (undiscounted). In
32 addition, the proposed action will require an estimated \$6 million (undiscounted) of contract

⁷ While there may be some costs associated with developing a generic statement on continued storage within a site-specific NEPA document, as well as responding to potential adjudicatory issues related to continued storage, these costs are assumed to be negligible. Therefore, the site-specific review costs are assumed to be \$0 for this analysis.

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1 support spread across the 2 years. Most of the expenditures associated with the proposed
2 action will occur as a result of the GEIS development. The NRC estimates that approximately
3 6 FTE, or \$1.04 million, of the total expenditure is a result of the rulemaking portion of the
4 proposed action. See Appendix H, Table H-4, for more information regarding GEIS and
5 rulemaking costs.

6 **Table 7-2.** Constant and Discounted Estimated Costs of the Proposed Action

Components	Estimated Costs (millions of dollars)		
	Constant Dollars	3% Discount Case	7% Discount Case
Site-Specific Review Costs	-	-	-
GEIS Costs	\$12.9	\$12.7	\$12.5
Rulemaking Costs	\$1.04	\$1.02	\$1.00
Policy Statement Costs	-	-	-
Estimated Total Cost^(a)	\$14.0	\$13.8	\$13.5

(a) Due to rounding, some costs may not appear to sum correctly.

7 **7.4 Estimated Costs and Benefits of the GEIS-Only** 8 **Alternative**

9 The GEIS-only alternative is similar to the proposed action insofar as the NRC develops and
10 relies upon a GEIS. It differs because the Commission does not incorporate the GEIS findings
11 into a rule. Because the Commission does not codify the GEIS findings in this alternative, the
12 environmental impacts of continued storage remain open to site-specific consideration by the
13 NRC. Petitioners may also challenge an applicant's or the NRC's consideration of the impacts
14 of continued storage without a waiver petition pursuant to 10 CFR 2.335. Reliance on a GEIS to
15 address generic issues is consistent with CEQ guidance regarding efficiency and timeliness
16 under NEPA (77 FR 14473).

17 The primary benefit of the GEIS-only alternative relative to the no-action alternative is that it
18 reduces NRC and applicant costs in conducting site-specific NEPA reviews. The NRC assumes
19 that applicants will refer to GEIS findings in environmental reports and the NRC will incorporate
20 GEIS findings and analyses by reference into NEPA documents for new reactor licensing,
21 reactor license renewals, ISFSI licensing, and ISFSI license renewals. The NRC assumes that
22 reliance on the GEIS in site-specific reviews may resolve concerns for some issues related to
23 continued storage, while other issues may require additional effort to resolve comments,
24 address site-specific litigation, or to establish that the GEIS findings are applicable to a specific
25 licensing proceeding. As a result, the NRC assumes that the GEIS-only alternative will
26 decrease the cost to the NRC and applicants by 50 percent compared to the no-action
27 alternative at best, and at worst will not reduce the NRC and applicant effort compared to the

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1 no-action alternative. Therefore, the NRC presents the costs of the GEIS-only alternative for
 2 site-specific reviews as a range in Table 7-3.

3 **Table 7-3.** Constant and Discounted Estimated Costs of the GEIS-Only Alternative

Components	Estimated Costs (millions of dollars)		
	Constant Dollars	3% Discount Case	7% Discount Case
Site-Specific Review Costs	\$12.2 to \$24.3	\$10.7 to \$21.4	\$9.31 to \$18.6
GEIS Costs	\$12.9	\$12.7	\$12.5
Rulemaking Costs	-	-	-
Policy Statement Costs	-	-	-
Estimated Total Cost^(a)	\$25.1 to \$37.3	\$23.4 to \$34.1	\$21.8 to \$31.1

(a) Due to rounding, costs may appear not to sum correctly.

4 As was the case in the no-action alternative, there is a public-perception benefit from the NRC's
 5 reviewing the environmental impacts of continued storage in site-specific licensing actions as
 6 part of the GEIS-only alternative. In a site-specific NEPA analysis, the NRC would describe
 7 location-specific conditions, address the site-specific impacts of a potential licensing action, and
 8 address the impacts of continued storage. The value of reviewing continued storage in site-
 9 specific NEPA analyses is difficult to quantify; however, a site-specific analysis of the
 10 environmental impacts of continued storage would likely not reveal any new information that
 11 cannot be addressed in a generic analysis.

12 Preparation of the GEIS, however, requires costs not incurred under the no-action alternative,
 13 as shown in Table 7-3. GEIS preparation requires an estimated 20 FTEs, or \$3.46 million, in
 14 each of 2013 and 2014, or \$7.92 million total (undiscounted). In addition, GEIS preparation will
 15 require an estimated \$6 million of contract support spread across the 2 years. See Appendix H,
 16 Table H-4, for more information regarding GEIS costs.

17 Similar to the no-action alternative, another cost of the GEIS-only alternative relates to
 18 increased scheduling uncertainties in licensing due to additional environmental reviews and
 19 potential increased litigation associated with continued storage. The effects of schedule
 20 uncertainties are likely to be most significant for new reactor or new site-specific ISFSI
 21 applicants. Delays can be more costly for new reactor applicants, which could incur billions of
 22 dollars of additional expenses if a project is delayed. These costs can include increased
 23 financing costs, longer-term accumulation of interest on debt, replacement-power costs, and
 24 contractual penalties. Because these costs vary significantly and are case-specific, the NRC
 25 has not attempted to quantify them.

26 Applicants for renewed reactor and site-specific ISFSI licenses that submit timely and sufficient
 27 renewal applications are protected from schedule uncertainty, at least insofar as continued

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1 operations are concerned, by provisions of 10 CFR 2.109. Specifically, 10 CFR 2.109 allows for
2 operations of reactors and ISFSIs until such applications have been finally determined, even if
3 final determination takes place after the license expiration date. Nonetheless, delays may affect
4 applicants' plans to commence activities that may depend upon renewed licenses. Because
5 these types of expenses are case-specific, the NRC has not attempted to quantify them.

6 **7.5 Estimated Costs and Benefits of the Policy Statement** 7 **Alternative**

8 The policy-statement alternative is similar to the GEIS-only alternative. As in the GEIS-only
9 alternative, the policy-statement alternative would rely on a GEIS to address the environmental
10 impacts of continued storage. In addition, the Commission would develop a policy statement to
11 address specific issues and to bind the NRC in its approach to addressing the environmental
12 impacts of continued storage in site-specific environmental reviews.

13 As in the GEIS-only alternative, the Commission does not incorporate the GEIS findings into a
14 rule. Because the Commission does not codify the GEIS findings in this alternative, the
15 environmental impacts of continued storage remain open to site-specific consideration by the
16 NRC, within the constraints imposed by the Commission's policy statement. Petitioners may
17 challenge an applicant's or the NRC's consideration of the impacts of continued storage without
18 a waiver petition pursuant to 10 CFR 2.335 and would not be constrained by the Commission's
19 policy statement on continued storage. Reliance on a GEIS, however, to address generic
20 issues is consistent with CEQ guidance regarding efficiency and timeliness under NEPA
21 (77 FR 14473).

22 In application, the policy-statement alternative is substantially similar to the GEIS-only
23 alternative. The primary benefit is that it reduces NRC and applicant effort in conducting
24 reviews, thereby increasing efficiency and thus decreasing cost. The NRC assumes that
25 applicants will refer to GEIS findings in environmental reports, and the NRC will incorporate
26 GEIS findings and analyses by reference into site-specific EISs for new reactors, reactor license
27 renewals, and ISFSI licensing. As in the GEIS-only alternative, the NRC assumes that reliance
28 on the GEIS in site-specific reviews may resolve concerns for some issues related to continued
29 storage, while other issues may require additional effort to resolve comments, address site-
30 specific litigation, or to establish that the GEIS findings are applicable to a specific licensing
31 proceeding. The NRC assumes that the decreased cost in conducting site-specific reviews
32 under the policy-statement alternative relative to the no-action alternative is likely to be similar to
33 the decreased effort from the GEIS-only approach relative to the no-action alternative. The
34 NRC assumes that the policy-statement alternative will decrease the cost to the NRC and
35 applicants by an estimated 50 percent relative to the no-action alternative at best, and at worst
36 will not reduce the NRC and applicant effort compared to the no-action alternative. The NRC
37 therefore presents the cost of the policy-statement alternative as a range in Table 7-4.

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1 **Table 7-4.** Constant and Discounted Estimated Costs of the Policy-Statement Alternative

Components	Estimated Costs (millions of dollars)		
	Constant Dollars	3% Discount Case	7% Discount Case
Site-Specific Review Costs	\$12.2 to \$24.3	\$10.7 to \$21.4	\$9.31 to \$18.6
GEIS Costs	\$12.9	\$12.7	\$12.5
Rulemaking Costs	-	-	-
Policy Statement Costs	\$0.519	\$0.511	\$0.502
Estimated Total Cost^(a)	\$25.6 to \$37.8	\$23.9 to \$34.6	\$22.3 to \$31.6

(a) Due to rounding, costs may appear not to sum correctly.

2 Preparation of the GEIS and policy statement add to the costs of this alternative. The NRC
 3 estimates that a policy statement adds 3 FTEs, or \$519,000 (undiscounted), to the cost estimate
 4 for the policy-statement alternative. GEIS preparation requires an estimated 20 FTEs, or
 5 \$3.46 million, in each of 2013 and 2014, or \$7.92 million total (undiscounted). In addition, GEIS
 6 preparation will require an estimated \$6 million (undiscounted) of contract support spread
 7 across the 2 years. As a result of the effort expended in creating the GEIS and policy statement
 8 in addition to the effort expended in performing site-specific reviews, the GEIS-only alternative
 9 provides a negative net benefit when compared to the no-action alternative. See Appendix H,
 10 Table H-4, for more information regarding GEIS and policy-statement costs.

11 Similar to the no-action and GEIS-only alternative, another cost of the policy-statement
 12 alternative relates to increased scheduling uncertainties in licensing due to additional
 13 environmental reviews and potential increased litigation associated with continued storage. The
 14 effects of schedule uncertainties are likely to be most significant for new reactor or new site-
 15 specific ISFSI applicants. Delays can be more costly for new reactor applicants, which could
 16 incur billions of dollars of additional expenses if a project is delayed. These costs can include
 17 increased financing costs, longer-term accumulation of interest on debt, replacement-power
 18 costs, and contractual penalties. Because these costs vary significantly and are case-specific,
 19 the NRC has not attempted to quantify them.

20 As was the case in the no-action alternative and the GEIS-only alternative, there is a public-
 21 perception benefit from the NRC's reviewing the environmental impacts of continued storage in
 22 site-specific licensing actions as part of the policy-statement alternative. In a site-specific NEPA
 23 analysis, the NRC would describe location-specific conditions, address the site-specific impacts
 24 of a potential licensing action, and address the impacts of continued storage. The value of
 25 reviewing continued storage in site-specific NEPA analyses is difficult to quantify; however, a
 26 site-specific analysis of the environmental impacts of continued storage would likely not reveal
 27 any new information that cannot be addressed in a generic analysis.

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1 Applicants for renewed reactor and site-specific ISFSI licenses that submit timely and sufficient
2 renewal applications are protected from schedule uncertainty, where continued operations are
3 concerned, by provisions of 10 CFR 2.109. Specifically, 10 CFR 2.109 allows for operations of
4 reactors and ISFSIs until such applications have been finally determined, even if final
5 determination takes place after the license expiration date. Nonetheless, delays may affect
6 applicants' plans to commence activities that may depend upon renewed licenses. Because
7 these types of expenses vary significantly and are case-specific, the NRC has not attempted to
8 quantify them.

9 7.6 Comparison of Alternatives

10 Table 7-5 summarizes the estimated quantified costs for all alternatives. It also presents the
11 cost savings (or costs) of each action alternative relative to the no-action alternative. The
12 analysis indicates that the quantified cost for the proposed action is significantly lower than the
13 cost for any of the alternatives (see Table 7-5). This occurs primarily because the NRC does
14 not undertake site-specific reviews of continued storage in the course of individual licensing
15 proceedings as part of the proposed action. In general, the no-action alternative is substantially
16 more costly than the proposed action, but less costly (cost savings) than either the GEIS-only or
17 policy-statement alternatives (see Appendix H, Table H-5, for additional detail).

18 **Table 7-5.** Summary of Constant and Discounted Estimated Costs for Each Alternative (in
19 millions of dollars)

	Proposed Action	GEIS-Only	Policy Statement	No Action
Constant 2013 Dollars				
Estimated Cost	\$14.0	\$25.1 to \$37.3	\$25.6 to \$37.8	\$24.3
Savings (costs) versus no action ^(a)	\$10.4	(\$12.9) to (\$0.753)	(\$13.4) to (\$1.27)	-
3% Discount Case				
Estimated Cost	\$13.8	\$23.4 to \$34.1	\$23.9 to \$34.6	\$21.4
Savings (costs) versus no action ^(a)	\$7.65	(\$12.7) to (\$2.03)	(\$13.2) to (\$2.54)	-
7% Discount Case				
Estimated Cost	\$13.5	\$21.8 to \$31.1	\$22.3 to \$31.6	\$18.6
Savings (costs) versus no action ^(a)	\$5.11	(\$12.5) to (\$3.19)	(\$13.0) to (\$3.69)	-

(a) Due to rounding, some costs may appear not to sum correctly.

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1 While the no-action alternative avoids the costs associated with a GEIS and rulemaking, site-
2 specific review costs are significantly higher than the avoided costs of the GEIS and rulemaking.
3 The GEIS-only and policy-statement alternatives avoid the costs of rulemaking, but result in
4 higher costs than the no-action alternative because of their respective up-front costs.

5 In addition to quantified financial differences among the alternatives, unquantified (qualified)
6 differences also exist. Table 7-6 contains a summary of unquantified costs and benefits of the
7 alternatives. First, all alternatives other than the proposed action create schedule uncertainties
8 that result from site-specific litigation of generic continued storage issues. While costs that
9 result from these uncertainties may be large, they are difficult to quantify because they vary
10 significantly, and they are case- and fact-dependent. The ability to litigate site-specific issues
11 without a waiver petition pursuant to 10 CFR 2.335 carries both costs and benefits. In addition,
12 there is a public-perception benefit from NRC's reviewing continued storage in site-specific
13 licensing actions.

14 As noted in the introduction to this chapter, each of the alternatives here provides a means of
15 addressing the environmental impacts of continued storage. The alternatives do not noticeably
16 alter the NRC's assessment of environmental impacts presented in Chapters 4, 5, and 6, so the
17 environmental impacts identified in those chapters are applicable regardless of which alternative
18 NRC chooses to pursue.

19 The NRC considers the results of this analysis in the cost-benefit balance discussion contained
20 in Section 8.6, and this analysis informs the NRC's recommendation in Section 8.7.

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Table 7-6. Summary of Unquantified Costs and Benefits of Each Alternative

No-Action Alternative	
<u>Benefits</u>	<u>Costs</u>
<ul style="list-style-type: none"> • Public-perception benefit from site-specific reviews • Public-perception benefit from the ability to challenge NRC findings without a waiver petition 	<ul style="list-style-type: none"> • Potential for additional delays due to site-specific litigation, which may incur substantial additional costs • Repetitive consideration of a generic issue • Not consistent with CEQ guidance on efficiency and timeliness • Potential additional costs from small modular reactor applications
Proposed Action	
<u>Benefits</u>	<u>Costs</u>
<ul style="list-style-type: none"> • Generically resolves a generic issue; avoids unnecessary, repetitive reviews • Removes potential for lengthy, site-specific litigation and resulting delays, except in cases with special circumstances • Consistent with CEQ guidance on efficiency and timeliness • Avoids potential additional costs from small modular reactor applications 	<ul style="list-style-type: none"> • Public-perception cost from precluding continued storage from site-specific review • Public-perception cost from being unable to challenge NRC findings without a waiver petition
GEIS-Only	
<u>Benefits</u>	<u>Costs</u>
<ul style="list-style-type: none"> • Public-perception benefit from site-specific reviews • Public-perception benefit from the ability to challenge NRC findings without a waiver petition • Consistent with CEQ guidance on efficiency and timeliness 	<ul style="list-style-type: none"> • Potential for additional delays due to site-specific litigation, which may incur substantial additional costs • Repetitive consideration of a generic issue • Potential additional costs from small modular reactor applications
Policy Statement	
<u>Benefits</u>	<u>Costs</u>
<ul style="list-style-type: none"> • Public-perception benefit from site-specific reviews • Public-perception benefit from the ability to challenge NRC findings without a waiver petition • Consistent with CEQ guidance on efficiency and timeliness 	<ul style="list-style-type: none"> • Potential for additional delays due to site-specific litigation, which may incur substantial additional costs • Repetitive consideration of a generic issue • Potential additional costs from small modular reactor applications

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Cost-Benefit Analysis

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6 10 CFR Part 51. *Code of Federal Regulations*, Title 10, *Energy*, Part 51, “Environmental
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13 10 CFR Part 72. *Code of Federal Regulations*, Title 10, *Energy*, Part 72, “Licensing
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8.0 Summary of Environmental Impacts

This chapter summarizes the potential environmental impacts and consequences of continued at-reactor and away-from-reactor spent nuclear fuel (spent fuel) storage after a reactor's licensed life for operation (continued storage). In summarizing, the potential impacts and consequences of these activities are discussed in terms of (1) the unavoidable adverse environmental impacts, (2) the irreversible and irretrievable commitment of resources, and (3) the relationship between local short-term uses of the environment and the maintenance of long-term productivity.

The U.S. Nuclear Regulatory Commission's (NRC) regulations under Title 10 of the *Code of Federal Regulations* Part 51(10 CFR Part 51) implement the requirements of the National Environmental Policy Act of 1969, as amended (NEPA). Section 102(2)(C) of NEPA requires that an environmental impact statement (EIS) include information about the following:

- any adverse environmental effects that cannot be avoided, should the proposal be implemented
- any irreversible and irretrievable commitments of resources that would be involved in the proposed action should it be implemented
- the relationship between local short-term uses of the environment and the maintenance and enhancement of long-term productivity

As discussed in Chapter 1, the significance of potential environmental impacts is categorized as follows:

SMALL—The environmental effects are not detectable or are so minor that they will neither destabilize nor noticeably alter any important attribute of the resource.

MODERATE—The environmental effects are sufficient to alter noticeably, but not to destabilize, important attributes of the resource.

LARGE—The environmental effects are clearly noticeable and are sufficient to destabilize important attributes of the resource.

For some resource areas, the impact determination language is specific to the authorizing regulation, executive order, or guidance. Specifically, the Endangered Species Act of 1973, as amended (ESA) includes findings of (1) no effect, (2) not likely to adversely affect, (3) likely to adversely affect, or (4) is likely to jeopardize the listed species or adversely modify the designated critical habitat of Federally listed species populations or their critical habitats. In

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Summary of Environmental Impacts

1 addition, regarding the NRC analyses of environmental justice impacts in the draft “Waste
2 Confidence Generic Environmental Impact Statement” (draft GEIS), under Executive
3 Order 12898 (59 FR 7629), Federal agencies are responsible for identifying and addressing
4 potential disproportionately high and adverse human health and environmental impacts on
5 minority and low-income populations.

6 **8.1 Comparison of Environmental Impacts**

7 The environmental impacts related to at-reactor storage of spent fuel are described in Chapter 4
8 and are summarized by timeframe in Table 8-1. Impacts associated with away-from-reactor
9 storage of spent fuel are described in Chapter 5 and are summarized by timeframe in Table 8-2.
10 Cumulative impacts associated with spent fuel storage when considered along with the impacts
11 of other past, present, and reasonably foreseeable future projects are described in Chapter 6
12 and summarized with the incremental impacts from Chapters 4 and 5 in Table 8-3.

13 **Table 8-1.** Summary of Environmental Impacts of Continued At-Reactoer Storage

Resource Area	Short-Term Storage	Long-Term Storage	Indefinite Storage
Land Use	SMALL	SMALL	SMALL
Socioeconomics	SMALL	SMALL	SMALL
Environmental Justice	No disproportionately high and adverse impacts	No disproportionately high and adverse impacts	No disproportionately high and adverse impacts
Air Quality	SMALL	SMALL	SMALL
Climate Change	SMALL	SMALL	SMALL
Geology and Soils	SMALL	SMALL	SMALL
Surface-Water Quality and Use	SMALL	SMALL	SMALL
Groundwater Quality and Use	SMALL	SMALL	SMALL
Terrestrial Resources	SMALL	SMALL	SMALL
Aquatic Ecology	SMALL	SMALL	SMALL
Special Status Species and Habitat	Impacts from the spent fuel pool would be determined as part of the ESA Section 7 consultation. Independent spent fuel storage installation (ISFSI) operations are not likely to adversely affect special status species and habitats.	Not likely to adversely affect special status species and habitats.	

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Summary of Environmental Impacts

1 **Table 8-1.** Summary of Environmental Impacts of Continued At-Reactor Storage (cont'd)

Resource Area	Short-Term Storage	Long-Term Storage	Indefinite Storage
Historic and Cultural Resources	SMALL	SMALL, MODERATE, or LARGE	SMALL, MODERATE, or LARGE
Noise	SMALL	SMALL	SMALL
Aesthetics	SMALL	SMALL	SMALL
Waste Management			
LLW	SMALL	SMALL	SMALL
Mixed Waste	SMALL	SMALL	SMALL
Nonradioactive Waste	SMALL	SMALL	SMALL to MODERATE
Transportation	SMALL	SMALL	SMALL
Public and Occupational Health	SMALL	SMALL	SMALL
Accidents	SMALL	SMALL	SMALL
Sabotage or Terrorism	SMALL	SMALL	SMALL

2 **Table 8-2.** Summary of Environmental Impacts of Continued Storage at an Away-from-Reactor
3 ISFSI

Resource Area	Construction and Operation	Long-Term Storage	Indefinite Storage
Land Use	SMALL	SMALL	SMALL
Socioeconomics	SMALL (adverse) to LARGE (beneficial)	SMALL (adverse) to LARGE (beneficial)	SMALL (adverse) to LARGE (beneficial)
Environmental Justice	No disproportionately high and adverse impacts	No disproportionately high and adverse impacts	No disproportionately high and adverse impacts
Air Quality	SMALL to MODERATE	SMALL	SMALL
Climate Change	SMALL	SMALL	SMALL
Geology and Soils	SMALL	SMALL	SMALL
Surface-Water Quality and Use	SMALL	SMALL	SMALL
Groundwater Quality and Use	SMALL	SMALL	SMALL
Terrestrial Resources	SMALL to MODERATE	SMALL	SMALL
Aquatic Ecology	SMALL	SMALL	SMALL

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Summary of Environmental Impacts

1 **Table 8-2.** Summary of Environmental Impacts of Continued Storage at an Away-from-Reactor
2 ISFSI (cont'd)

Resource Area	Construction and Operation	Long-Term Storage	Indefinite Storage
Special Status Species and Habitat	Impacts from the construction of the ISFSI would be determined as part of the ESA Section 7 consultation. Assuming the ISFSI can be sited to avoid special status species and habitats, operation and replacement of the ISFSI is not likely to adversely affect special status species and habitats. Impacts would be determined as part of ESA Section 7 consultation if continued storage would affect listed species or critical habitat.		
Historic and Cultural Resources	SMALL, MODERATE, or LARGE	SMALL, MODERATE, or LARGE	SMALL, MODERATE, or LARGE
Noise	SMALL	SMALL	SMALL
Aesthetics	SMALL to MODERATE	SMALL to MODERATE	SMALL to MODERATE
Waste Management			
LLW	SMALL	SMALL	SMALL
Mixed Waste	SMALL	SMALL	SMALL
Nonradioactive Waste	SMALL	SMALL	SMALL to MODERATE
Transportation	SMALL to MODERATE	SMALL to MODERATE	SMALL to MODERATE
Public and Occupational Health	SMALL	SMALL	SMALL
Accidents	SMALL	SMALL	SMALL
Sabotage or Terrorism	SMALL	SMALL	SMALL

3 **Table 8-3.** Summary of the Cumulative Impacts from Continued Storage When Added to Other
4 Federal and Non-Federal Activities

Resource Area	Incremental Impact from At-Reactor Storage	Incremental Impact from Away-from-Reactor Storage	Cumulative Impact from Continued Storage and other Federal and Non-Federal Activities
Land Use	SMALL	SMALL	SMALL to MODERATE
Socioeconomics	SMALL	SMALL (adverse) to LARGE (beneficial)	SMALL to LARGE
Environmental Justice	No disproportionately high and adverse impacts	No disproportionately high and adverse impacts	No disproportionately high and adverse impacts

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Summary of Environmental Impacts

1 **Table 8-3.** Summary of the Cumulative Impacts from Continued Storage When Added to Other
2 Federal and Non-Federal Activities (cont'd)

Resource Area	Incremental Impact from At-Reactor Storage	Incremental Impact from Away-from-Reactor Storage	Cumulative Impact from Continued Storage and other Federal and Non-Federal Activities
Air Quality	SMALL	SMALL to MODERATE	SMALL to MODERATE
Climate Change	SMALL	SMALL	MODERATE
Geology and Soils	SMALL	SMALL	SMALL to MODERATE
Surface-Water Quality and Use	SMALL	SMALL	SMALL to LARGE
Groundwater Quality and Use	SMALL	SMALL	SMALL to LARGE
Terrestrial Resources	SMALL	SMALL to MODERATE	SMALL to MODERATE
Aquatic Ecology	SMALL	SMALL	SMALL to LARGE
Historic and Cultural Resources	SMALL, MODERATE, or LARGE	SMALL, MODERATE, or LARGE	SMALL, MODERATE, or LARGE
Noise	SMALL	SMALL	SMALL to MODERATE
Aesthetics	SMALL	SMALL to MODERATE	SMALL to MODERATE
Waste Management	SMALL to MODERATE	SMALL to MODERATE	SMALL to LARGE
Transportation	SMALL	SMALL to MODERATE	SMALL to MODERATE
Public and Occupational Health	SMALL	SMALL	SMALL
Accidents	SMALL	SMALL	SMALL

3 **8.2 Unavoidable Adverse Environmental Impacts**

4 Section 102(2)(C)(ii) of NEPA requires that an EIS include information about any adverse
5 environmental effects that cannot be avoided if the proposal is implemented. This draft GEIS
6 provides a regulatory basis for a rule that generically addresses the small portion of reactor and
7 ISFSI NEPA analyses that would discuss the likely impacts of spent fuel storage during
8 continued storage. Other aspects of spent fuel storage will either be addressed in site-specific
9 analyses or are addressed generically elsewhere. Thus, for the purposes of this draft GEIS,

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Summary of Environmental Impacts

1 unavoidable adverse environmental impacts are those potential impacts of the NRC action that
2 cannot be avoided due to constraints inherent in using at-reactor and away-from-reactor spent
3 fuel storage facilities to store spent fuel beyond the licensed life of operation of a reactor until a
4 repository is available.

5 The unavoidable adverse environmental impacts associated with continued storage of spent
6 fuel would include impacts of (1) short-term storage in a spent fuel pool, (2) short-term storage,
7 (3) long-term storage, and (4) indefinite storage in at-reactor and away-from-reactor ISFSIs.
8 The short-term storage timeframe assumes that a repository becomes available by 60 years
9 after the end of the reactor's licensed life for operation. The long-term storage timeframe
10 assumes that a repository becomes available by 160 years after the end of the reactor's
11 licensed life for operation. As discussed in Chapter 1 of this draft GEIS, the NRC believes that
12 the most likely outcome is that a repository will become available to accept the spent fuel
13 generated by a reactor by the end of the short-term timeframe, or 60 years after the end of the
14 reactor's licensed life for operation.

15 The short-term storage timeframe involves continued operation of at-reactor spent fuel pool
16 storage and an at-reactor or away-from-reactor ISFSI until a repository is available. The long-
17 term storage timeframe involves construction and operation of a dry cask transfer facility (DTS),
18 continued operation of an at-reactor or away-from-reactor ISFSI, and replacement of these
19 facilities within the 100-year period. The NRC assumes a repository becomes available at the
20 end of the long-term timeframe. Indefinite storage continues at an at-reactor or away-from-
21 reactor ISFSI in perpetuity with continued aging management activities and the assumed
22 replacement of the ISFSI and DTS every 100 years.

23 The potential impacts from the activities occurring within the three aforementioned storage
24 timeframes on each resource area are described in Chapter 4 for at-reactor storage and in
25 Chapter 5 for away-from-reactor storage. Table 8-1 and Table 8-2 summarize the unavoidable
26 adverse environmental impacts for each resource area. For at-reactor storage, the unavoidable
27 adverse environmental impacts for each resource area are SMALL with the exception of waste
28 management impacts, which are SMALL to MODERATE, and historic and cultural impacts,
29 which are SMALL, MODERATE, or LARGE. These elevated impact conclusions are influenced,
30 in part, by the uncertainties regarding the specific circumstances of continued storage over long
31 timeframes, including site-specific characteristics that could affect the intensity of potential
32 environmental impacts, and the resulting analysis assumptions that have been made by the
33 NRC as documented in detail in Chapter 4. The moderate waste-management impacts are
34 associated with the volume of nonhazardous solid waste generated by assumed facility
35 replacement activities for only the indefinite timeframe. The SMALL, MODERATE, or LARGE
36 historic and cultural impacts are based on a combination of the additional surface-disturbing
37 activities from DTS construction and facility replacement activities during long-term and
38 indefinite timeframes and a range of site-specific characteristics that are assumed for the

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Summary of Environmental Impacts

1 purpose of evaluating a reasonable range of potential impacts. More specifically, these
2 potential historic and cultural impacts vary depending on whether resources are present, the
3 extent of proposed land disturbance, if the area has been previously surveyed to identify historic
4 and cultural resources, and if the licensee has management plans and procedures that are
5 protective of historic and cultural resources.

6 Resource areas where the impact determination language is specific to the authorizing
7 regulation, executive order, or guidance include special status species and environmental
8 justice. For special status species, at-reactor ISFSI storage would be not likely to adversely
9 affect special status species and habitats, whereas spent fuel pool continued storage impacts
10 would be based on site-specific conditions and determined as part of an ESA Section 7
11 consultation. The NRC environmental justice impact analysis concluded there would be no
12 disproportionately high and adverse human health and environmental impacts on minority and
13 low-income populations.

14 For away-from-reactor storage, the unavoidable adverse environmental impacts for each
15 resource area would be SMALL except for air quality, terrestrial ecology, aesthetics, waste
16 management, and transportation where the impacts would be SMALL to MODERATE.
17 Socioeconomics impacts would range from SMALL to LARGE and historic and cultural impacts
18 could be SMALL, MODERATE, or LARGE. The potential MODERATE impacts on air, terrestrial
19 wildlife, and transportation are based on construction-related potential fugitive dust emissions,
20 terrestrial wildlife direct and indirect mortalities, and temporary construction traffic impacts. The
21 potential MODERATE impacts on aesthetics and waste management are based on noticeable
22 changes to the viewshed from constructing a new ISFSI, and the volume of nonhazardous solid
23 waste generated by assumed ISFSI and DTS replacement activities for only the indefinite
24 timeframe. Potential LARGE impacts on socioeconomics would be due to local economic tax
25 revenue increases from an away-from-reactor ISFSI. The LARGE impacts on historic and
26 cultural apply to assumed site-specific circumstances at an away-from-reactor ISFSI involving
27 the presence of these resources during construction activities and absence of effective
28 protection measures. Specifically, these potential historic and cultural impacts vary depending
29 on whether resources are present, the extent of proposed land disturbance, and whether the
30 licensee has management plans and procedures that are protective of historic and cultural
31 resources.

32 Resource areas where the impact determination language is specific to the authorizing
33 regulation, executive order, or guidance include special status species and environmental
34 justice. For special status species, away-from-reactor ISFSI storage would be not likely to
35 adversely affect special status species and habitats based on the assumption an ISFSI can be
36 sited to avoid special status species and habitats. Impacts on special status species and
37 habitats would be based on site-specific conditions and determined as part of an ESA Section 7
38 consultation. The NRC environmental justice impact analysis for an away-from-reactor ISFSI

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1 concluded there would be no disproportionately high and adverse human health and
2 environmental impacts on minority and low-income populations.

3 **8.3 Irreversible and Irretrievable Commitments of** 4 **Resources**

5 Section 102(2)(C)(v) of NEPA requires that an EIS include information about irreversible and
6 irretrievable commitments of resources that would occur if the proposed actions are
7 implemented. The NRC guidance in NUREG-1748, "Environmental Review Guidance for
8 Licensing Actions Associated with NMSS Programs" (NRC 2003), defines an irreversible
9 commitment as the commitment of environmental resources that cannot be restored. In
10 addition, an irretrievable commitment refers to the commitment of material resources that once
11 used cannot be recycled or restored for other uses by practical means. This draft GEIS
12 provides a regulatory basis for a rule that generically addresses the small portion of reactor and
13 ISFSI NEPA analyses that would discuss the likely impacts of spent fuel storage during
14 continued storage. Other aspects of spent fuel storage will either be addressed in site-specific
15 analyses or are addressed generically elsewhere. Thus, for the purposes of this draft GEIS, the
16 NRC is analyzing the irreversible commitments of resources that would occur if continued
17 storage were to occur. As stated throughout this draft GEIS, this draft GEIS is not a licensing
18 decision and does not authorize a licensee to store spent fuel.

19 For both at-reactor and away-from-reactor ISFSIs, there would be no irreversible and
20 irretrievable commitments of resources during continued storage for most resources. However,
21 impacts on land use, aesthetics, historic and cultural resources, waste management, and
22 transportation would result in irreversible and irretrievable commitments. As finite resources,
23 the loss of historic and cultural resources would constitute irreversible and irretrievable impacts.
24 For the indefinite storage timeframe, land and visual resources allocated for spent fuel storage
25 would be committed in perpetuity because continued operations would preempt other productive
26 land uses and permanently affect the viewshed. The area of land that would be occupied by an
27 at-reactor ISFSI is assumed to be 2.4 ha (6 ac) for both ISFSI and DTS facilities
28 (Section 2.1.2.2) or 330 ha (820 ac) for an away-from-reactor ISFSI (Section 2.1.3). Waste-
29 management activities involving waste treatment, storage, and disposal would result in
30 irreversible commitment of capacity for waste disposal. The largest volume of waste requiring
31 disposal during continued storage was nonradiological demolition waste from replacement of an
32 away-from-reactor ISFSI (247,500 m³ [324,000 yd³]), as described in Section 5.15.2.
33 Repackaging of spent fuel into transportation casks would require new canisters and would
34 generate canister waste that would have to be disposed at an approved facility (approximately
35 100 to 150 canisters per typical reactor, as described in Section 2.1.2.2). Transportation
36 activities would involve irreversible and irretrievable commitment of resources including vehicle
37 fuel for commuting workers and shipping activities.

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8.4 Relationship between Short-Term Uses of the Environment and the Maintenance and Enhancement of Long-Term Productivity

Section 102(2)(C)(iv) of NEPA requires that an EIS include information about the relationship between local short-term uses of the environment and the maintenance and enhancement of long-term productivity. The NRC guidance in NUREG-1748 (NRC 2003) further clarifies that the short-term use period represents the period of the action under review and long-term productivity period represents the period extending beyond the end of the action under review. This draft GEIS provides a regulatory basis for a rule that generically addresses the small portion of reactor and ISFSI NEPA analyses that would discuss the likely impacts of spent fuel storage during continued storage. Other aspects of spent fuel storage will either be addressed in site-specific analyses or are addressed generically elsewhere. Thus, for the purposes of this draft GEIS, the short-term use period evaluated in this chapter is the period of time encompassing all continued storage activities defined in Chapter 1 (i.e., the period of analysis of environmental impacts evaluated by the three timeframes in Chapters 4 and 5 of this draft GEIS). In addition, the long-term productivity period evaluated in this chapter is the time period beyond continued storage (i.e., based on the NRC guidance in NUREG-1748, the period beyond the action under review). As discussed in Chapter 1 of this draft GEIS, the NRC believes that the most likely outcome is that a repository will become available to accept the spent fuel generated by a reactor by the end of the short-term timeframe, or 60 years after the end of the reactor's licensed life for operation. With respect to the indefinite storage timeframe, there is no time period beyond the storage action under review, for the purpose of the analysis in this subsection, and because the short-term timeframe is the most likely timeframe, the long-term productivity period considered in this chapter for the indefinite storage timeframe is assumed to begin at the end of the long-term storage timeframe evaluated in Chapters 4 and 5.

The local short-term use of the human environment is summarized in terms of the unavoidable adverse environmental impacts and irreversible and irretrievable commitments of resources summarized in Sections 8.2 and 8.3 and Table 8-1 and Table 8-2. With the exception of the consumption of depletable resources resulting from the evaluated construction and operations activities, these uses may be classified as short-term.

The maximum long-term impact on productivity would result when an at-reactor or away-from-reactor ISFSI is not immediately dismantled at the end of storage operations, or, as with the indefinite storage timeframe, it remains in operation indefinitely. Consequently, the land occupied by an ISFSI would not be available for any other uses. Most long-term impacts resulting from land-use preemption by ISFSI structures can be eliminated by removing these structures or by converting them to productive uses. Once continued storage ends, the facilities and associated land areas would be decommissioned according to NRC regulations. Once

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1 decommissioning is complete and the NRC license is terminated, the site would be available for
2 other uses. Other potential long-term impacts on productivity include the commitment of land
3 and consumption of disposal capacity necessary to meet waste disposal needs. This
4 commitment of land for disposal would remove land from productive use. In addition, because
5 loss of historic and cultural resources would constitute irreversible and irretrievable impacts, any
6 loss of historic and cultural resources during continued storage would persist as long-term
7 impacts. A small contribution to greenhouse gas emissions would add to the atmospheric
8 burden of emissions that could contribute to potential long-term impacts.

9 **8.5 Proposed Action and Alternatives**

10 As described in Section 1.4 of this draft GEIS, the proposed action is for the Commission to
11 issue a revised rule, 10 CFR 51.23, that generically addresses the environmental impacts of
12 continued storage. This revision would adopt into regulation the environmental impact analyses
13 in this draft GEIS. Further, the revision would state that because the impacts of continued
14 storage have been generically assessed in this draft GEIS and codified in a rule, the NEPA
15 analyses for future reactor and ISFSI licensing actions would not need to separately consider
16 the environmental impacts of continued storage.

17 Section 1.6 describes the alternatives to the proposed action as (1) the no-action alternative,
18 (2) the GEIS-only alternative, and (3) the policy-statement alternative. These alternatives do not
19 noticeably alter the environmental impacts from continued storage that the NRC addressed in
20 Chapters 4, 5, and 6. The alternatives instead provide different approaches that the NRC could
21 apply to future licensing activities that can satisfy the agency's responsibility to consider the
22 potential environmental impacts of continued storage in deciding whether to issue certain new
23 and renewed licenses.

24 Under the no-action alternative, the NRC would take no action to generically address the
25 environmental impacts of continued storage. The NRC would then perform site-specific reviews
26 of the environmental impacts of continued storage. In some cases, these reviews could involve
27 a time- and resource-intensive consideration of issues that could readily be resolved on a
28 generic basis. Therefore, this alternative is not consistent with Council on Environmental
29 Quality guidance for achieving efficiency and timeliness under NEPA.

30 Under the GEIS-only alternative, the NRC could develop and issue a GEIS that addresses the
31 generic environmental effects of continued storage and then would use the GEIS to support
32 site-specific licensing reviews. This nonbinding, GEIS-only alternative would add somewhat to
33 the efficiency of NRC reviews by addressing issues that are similar at all sites or otherwise
34 susceptible to generic consideration. This alternative could enable parties in licensing
35 proceedings to raise contentions challenging the GEIS conclusions. Thus, the GEIS-only
36 approach would eliminate some of the efficiency and time-savings that the NRC would

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1 gain through a binding generic analysis of continued storage, but it would provide greater
2 efficiencies than the no-action (site-specific) alternative.

3 Under the policy-statement alternative, the NRC could issue a policy statement that expresses
4 its intent either to incorporate the environmental impacts determined by the GEIS into site-
5 specific NEPA analyses or to prepare a site-specific evaluation without regard to the GEIS for
6 each NRC licensing action. Like the no-action and nonbinding GEIS-only alternatives, the
7 policy-statement alternative would reduce the efficiencies that the NRC would gain through a
8 rule whose incorporation of environmental impacts of continued storage would be binding in
9 licensing proceedings, but it would at least provide notice to parties that the Commission might
10 elect to incorporate by reference all or a portion of the existing GEIS.

11 **8.6 Cost-Benefit Balance**

12 This section summarizes benefits and costs associated with the proposed action, other action
13 alternatives, and the no-action alternative. A detailed accounting of costs and benefits of these
14 actions is provided in Chapter 7, which includes a cost-benefit comparison of the proposed
15 action and alternatives (Section 7.6). The alternatives considered in this chapter do not
16 noticeably alter the environmental impacts from continued storage that the NRC addressed in
17 Chapters 4, 5, and 6. The alternatives considered in this chapter instead provide different
18 approaches that the NRC could apply to future licensing activities that can satisfy the agency's
19 responsibility to consider the potential environmental impacts of continued storage in deciding
20 whether to issue certain licenses. As a result, the costs and benefits shown in this chapter
21 include the specific costs and benefits of the several alternatives. The costs and benefits do not
22 include the environmental impacts of continued storage, an activity that will occur regardless of
23 the alternative that the NRC selects to consider its impacts.

24 The NRC quantitative analysis of costs in Chapter 7 (Table 7-5) shows that the quantified cost
25 for the proposed action is significantly lower than the cost for any of the alternatives. This
26 occurs primarily because the NRC does not undertake site-specific reviews of continued storage
27 in the course of individual licensing proceedings as part of the proposed action. In general, the
28 no-action alternative is substantially more costly than the proposed action, but less costly (cost
29 savings) than either the GEIS-only or policy-statement alternatives (see Appendix H, Table H-5,
30 for additional detail).

31 While the no-action alternative avoids the costs associated with a GEIS and rulemaking, site-
32 specific review costs are significantly higher than the avoided costs of the GEIS and rulemaking.
33 The GEIS-only and policy-statement alternatives avoid the costs of rulemaking, but result in
34 higher costs than the no-action alternative because of their respective up-front costs of creating
35 the GEIS and the policy statement.

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Summary of Environmental Impacts

1 Unquantified costs and benefits of the alternatives (Chapter 7, Table 7-6) pertain to schedule
2 uncertainties, the ability to litigate site-specific issues, and site-specific continued storage
3 analyses. First, all alternatives other than the proposed action create schedule uncertainties
4 that result from site-specific litigation of generic continued storage issues. While costs that
5 result from these uncertainties may be large, they are difficult to quantify—they vary significantly
6 because they are case- and fact-dependent. Second, perceptions vary among stakeholders
7 regarding whether unquantified benefits are costs or benefits. The ability to litigate site-specific
8 issues without a waiver petition pursuant to 10 CFR 2.335 carries both costs and benefits. In
9 addition, there is a benefit from NRC’s reviewing continued storage in site-specific licensing
10 actions.

11 **8.7 Recommendation**

12 The NRC recommendation is to select the proposed action—~~revising 10 CFR 51.23~~—~~as the~~
13 ~~preferred alternative of adopting a rule that assumes the short-term storage alternative is the~~
14 ~~most likely scenario for handling spent fuel after reactor operations~~. The NRC recommendation
15 is based on (1) the NRC’s independent impact assessments of continued storage summarized
16 in the draft GEIS, which would result in substantially the same impact conclusions for any of the
17 evaluated alternatives; (2) the NRC’s consideration of public scoping comments in the
18 development of the draft GEIS; and (3) the NRC’s analysis of the cost-benefit balance of the
19 proposed action and alternatives. In making its preliminary recommendation, the NRC
20 determined that none of the alternatives assessed were obviously superior to the proposed
21 action.

22 **8.8 References**

23 10 CFR Part 2. *Code of Federal Regulations*, Title 10, *Energy*, Part 2, “Agency Rules of
24 Practice and Procedure.” Washington, D.C.

25 10 CFR Part 51. *Code of Federal Regulations*, Title 10, *Energy*, Part 51, “Environmental
26 Protection Regulations for Domestic Licensing and Related Regulatory Functions.”
27 Washington, D.C.

28 59 FR 7629. February 16, 1994. “Federal Actions to Address Environmental Justice in Minority
29 Populations and Low-Income Populations.” *Federal Register*, U.S. Environmental Protection
30 Agency, Washington, D.C.

31 National Environmental Policy Act (NEPA) of 1969, as amended. USC 4321-4347.

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- 1 NRC (U.S. Nuclear Regulatory Commission). 2003. *Environmental Review Guidance for*
2 *Licensing Actions Associated with NMSS Programs*. NUREG-1748, Washington, D.C.
3 Accession No. ML032540811.
- 4 NRC (U.S. Nuclear Regulatory Commission). 2013a. *Waste Confidence Generic*
5 *Environmental Impact Statement Scoping Process Summary Report*. Washington D.C.
6 Accession No. ML13030A128.
- 7 NRC (U.S. Nuclear Regulatory Commission). 2013b. *Scoping Comments on the Waste*
8 *Confidence Generic Environmental Impact Statement*. Washington, D.C. Accession
9 No. ML13060A130.

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9.0 List of Preparers

2 The overall responsibility for the preparation of this draft Waste Confidence Generic
3 Environmental Impact Statement (draft GEIS) was assigned to the Office of Nuclear Material
4 Safety and Safeguards (NMSS), U.S. Nuclear Regulatory Commission (NRC). NMSS had
5 assistance from other NRC organizations as well as the Center for Nuclear Waste Regulatory
6 Analyses (CNWRA). Tables 9-1 and 9-2 provide a listing of the NRC and CNWRA staff
7 involved, their experience, and their role in preparing this draft GEIS.

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Table 9-1. List of Preparers—NRC

Name	NRC Office	Experience	Function or Expertise
David Brown	NMSS	B.S., Physics, Muhlenberg College, 1990 M.S., Environmental Health Physics, Clemson University, 1993 Years of Relevant Experience: 20	Air quality, climate change, surface water, groundwater, transportation, public and occupational health, accidents and safeguards
Ralph Cady	RES	B.S., Geology, University of Connecticut, 1974 M.A., Geology, University of Connecticut, 1976 Ph.D., Hydrology, University of Arizona, 1989 Years of Relevant Experience: 24	Spent fuel pool leaks
Jennifer Davis	NMSS	B.A, Historic Preservation and Classical Civilization (Archaeology); Mary Washington College, 1996. 2 years of fieldwork; 11 years of experience in NEPA compliance, project management, historic and cultural resource impact analysis and regulatory compliance	Historic and cultural resources, socioeconomics, environmental justice, land use, noise
Donald Helton	RES	B.S., Nuclear Engineering, North Carolina State University, 1999 M.S., Nuclear Engineering, Texas A&M University, 2002 Years of Relevant Experience: 10	Spent fuel pool fires
Merri Horn	NMSS	B.S., Physics, Eastern Illinois University, 1980 M.S., Environmental Systems Engineering, Clemson University, 1987 Years of Relevant Experience: 29	Waste Confidence rule and decision
Andrew Kugler	NRO	B.S., Mechanical Engineering, Cooper Union, 1978 M.S., Technical Management, Johns Hopkins, 1998 Years of Relevant Experience: 34	Away-from-reactor impacts
Emily Larson	NRR	B.A., Anthropology (major, emphasis archaeology) and History (minor); University of Minnesota, 2004; -M.A., Archaeology; Bangor University, 2006 Years of Relevant Experience: 1 year of fieldwork; 1.5 years of experience in NEPA compliance; historic and cultural resource impact analysis and regulatory compliance	Historic and cultural resources
Sarah Lopas	NMSS	B.A., Molecular Biology, Lehigh University, 2001 MPA, Environmental Science and Policy, Columbia University, 2006 Years of Relevant Experience: 11	Executive summary, outreach
Timothy McCartin	NMSS	B.S., Physics, Xavier University, 1973 M.S., Physics, Wayne State University, 1976 Over 30 years' experience evaluating safety and regulatory compliance of geological disposal facilities	Public and occupational health, accidents and safeguards, Waste Confidence rule and decision

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Table 9-1. List of Preparers—NRC (cont'd)

Name	NRC Office	Experience	Function or Expertise
Paul Michalak	NMSS	B.S., Education, Temple University, 1978 M.S., Hydrology, New Mexico Institute of Mining and Technology, 1989 Years of Relevant Experience: 25	Spent fuel pool leaks
Michelle Moser	NRR	B.S., Environmental Sciences, Brown University, 2002 M.S., Biological Sciences, Stanford University, 2005 10 years of experience in ecological research and aquatic ecology, 7 years of experience in cumulative impact assessment and NEPA compliance	Aquatic ecology, cumulative impacts
Jessie Muir	NMSS	B.S., Biosystems Engineering, Clemson University, 2000 M.S., Environmental Engineering and Science, Clemson University, 2002 4 years in environmental compliance and solid waste management, 6 years in NEPA compliance and project management	Solid waste management
Tom Nicholson	RES	B.S., Geological Sciences, Pennsylvania State University, 1972 M.S., Geology, Stanford University, 1976 Professional Geologist, Indiana Certified Professional Hydrogeologist, AIH Years of Relevant Experience: 38	Senior technical advisor for radionuclide transport in the environment
Jeffrey Rikhoff	NRR	M.R.P., Regional Planning, University of Pennsylvania, 1988 M.S., Economic Development and Appropriate Technology, University of Pennsylvania, 1987 B.A., English (Composition), DePauw University, 1980 Years of Relevant Experience: 25 years of experience in NEPA compliance, socioeconomics and environmental justice impact analysis, cultural resource impacts, and comprehensive land-use and development planning	Socioeconomics, environmental justice
Andrew Stuyvenberg	NMSS	B.S., Biochemistry/Molecular Biology and Political Science, Marquette University, 2002 M.E.M., Environmental Economics and Policy, Duke University, 2005 J.D., Georgetown University Law Center, In Progress Years of Relevant Experience: 8	NEPA alternatives, NEPA process, cost-benefit analysis
Michael Wentzel	NMSS	B.S., Microbiology, University of Texas, 1997 Years of Relevant Experience: 15	Ecological resources, aesthetics, spent fuel pool leaks and fires

NRO = Office of New Reactor.
NRR = Office of Nuclear Reactor Regulation.
NSIR = Office of Nuclear Security and Incident Response.
RES = Office of Nuclear Regulatory Research.

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Table 9-2. List of Preparers—CNWRA

Name	Experience	Function or Expertise
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Amitava Ghosh	B.Tech., Mining Engineering, Indian Institute of Technology, 1978 M.S., Mining Engineering, University of Arizona, 1983 Ph.D., Mining Engineering, University of Arizona, 1990 Years of Relevant Experience: 12	Natural events and accidents
Amy Hester	B.A., Environmental Studies, University of Kansas, 1998 Years of Relevant Experience: 13	Terrestrial resources
Lane Howard	B.S., Civil Engineering, Texas A&M University, 1988 M.S., Nuclear Engineering, Texas A&M University, 1995 Years of Relevant Experience: 22	Public and occupational health
Miriam Juckett	B.A., Chemistry, University of Texas San Antonio, 2003 M.S., Environmental Sciences, University of Texas San Antonio, 2006 Years of Relevant Experience: 10	Communications, scoping, and outreach
Patrick LaPlante	B.S., Environmental Studies, Western Washington University, 1988 M.S., Biostatistics and Epidemiology, Georgetown University, 1994 Years of Relevant Experience: 24	Transportation
Todd Mintz	B.S., Chemical Engineering, Washington University St. Louis, 1998 Ph.D., Materials Science and Engineering, University of California Berkeley, 2003 Years of Relevant Experience: 1	Spent fuel pool fires
Marla Morales	B.A., Geology, Vanderbilt University, 2001 M.S., Geology, University of Texas San Antonio, 2007 Years of Relevant Experience: 12	Socioeconomics, environmental justice, geology, and soils
James Myers	B.S., Geology, Michigan State University, 1985 M.S., Geophysical Sciences, Georgia Institute of Technology, 1990 Ph.D., Environmental Science and Engineering, Clemson University, 2004 Years of Relevant Experience: 20	Solid waste management

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Table 9-2. List of Preparers—CNWRA (cont'd)

Name	Experience	Function or Expertise
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Roberto Pabalan	B.S., Geology, University of the Philippines, 1976 Ph.D., Geochemistry and Mineralogy, Pennsylvania State University, 1986 Years of Relevant Experience: 15	Spent fuel pool leaks
Robert Pauline	B.S., Biology, Bates College, 1989 M.S., Biology, George Mason University, 1999 Years of Relevant Experience: 7	Scoping
English Pearcy	B.S., Geology, Furman University, 1983 M.S., Geology, Harvard University, 1985 Ph.D., Geology, Harvard University, 1989 Years of Relevant Experience: 23	Aesthetics
James Prikryl	B.S., Geology, University of Texas, 1984 M.S., Geology, University of Texas, 1989 Years of Relevant Experience: 23	Land use
David Turner	B.A. in Music/Geology, College of William and Mary, 1981 M.S. in Geology, University of Utah, 1985 Ph.D. in Geology, University of Utah, 1990 Years of Relevant Experience: 23	Cumulative impacts
Bradley Werling	B.A., Engineering Physics, Westmont College, 1985 B.S., Chemistry, Southwest Texas State University, 1999 M.S., Environmental Science, University of Texas San Antonio, 2000 Years of Relevant Experience: 18	Noise, air quality, climate change

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Appendix A

Scoping Comments

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Appendix A

Scoping Comments

1 In this appendix, the U.S. Nuclear Regulatory Commission (NRC) incorporates, by reference,
2 the “Waste Confidence Generic Environmental Impact Statement Scoping Process Summary
3 Report” (Scoping Summary Report), which was prepared by the NRC in response to comments
4 received on the scope of the environmental review. The NRC issued the Scoping Summary
5 Report on March 4, 2013.

6 The Scoping Summary Report is available for public inspection in the NRC Public Document
7 Room, located at One White Flint North, 11555 Rockville Pike, Rockville, Maryland, 20852 or
8 from the NRC’s Agencywide Documents Access and Management System (ADAMS). The
9 ADAMS Public Electronic Reading Room is accessible at <http://www.nrc.gov/reading>
10 [rm/adams/web-based.html](http://www.nrc.gov/readingrm/adams/web-based.html). The Scoping Summary Report is listed under Accession No.
11 ML13060A128. Persons who do not have access to ADAMS or who encounter problems in
12 accessing the documents located in ADAMS should contact the NRC’s Public Document Room
13 reference staff by telephone at 1-800-397-4209 or 301-415-4737 or by e-mail at pdr@nrc.gov.

14 On October 25, 2012, the NRC published in the *Federal Register* a Notice of Intent to prepare
15 an environmental impact statement and conduct scoping, “Consideration of Environmental
16 Impacts of Temporary Storage of Spent Fuel After Cessation of Reactor Operation”
17 (77 FR 65137). The notice described the NRC’s intent to prepare a Waste Confidence Generic
18 Environmental Impact Statement (GEIS) and conduct webcast public scoping meetings and
19 webinars and requested comments on the scope of the Waste Confidence GEIS. Through the
20 notice, the NRC invited Federal, Tribal, State, and local governments; organizations; and
21 members of the public to provide comments on the scope of the GEIS no later than
22 January 2, 2013.

23 During the 70-day scoping period, the NRC held two public webcast scoping meetings and two
24 scoping webinars. The meetings and webinars each began with a slide presentation by NRC,
25 which was followed by a question-and-answer period and a block of time dedicated to listening
26 to and transcribing public scoping comments. The NRC considered all comments received
27 during the scoping meetings and webinars and all written comments submitted in-person at the
28 November 14, 2012 afternoon meeting. Appendix C provides the ADAMS accession numbers
29 for the meeting summaries and transcripts.

30 In addition, the NRC received hundreds of written comment letters through mail, fax, and
31 www.Regulations.gov (Docket ID NRC–2012–0246) during the comment period. Comments

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Appendix A

1 received after the January 2, 2013 closing date were considered where practicable. The NRC
2 reviewed and considered written comments together with the comments received during the
3 public meetings and webinars. Individual comments each received a unique comment
4 identification code, to ensure that each comment could be tracked, and received a response.
5 Comments were consolidated and categorized according to subject matter or topic. The
6 Scoping Summary Report contains the NRC responses to these grouped comments.
7 Separately, the NRC published a document containing the text of the comments, "Scoping
8 Comments on the Waste Confidence Generic Environmental Impact Statement," which is
9 located in ADAMS under Accession No. ML13060A130. This document contains a table that
10 identifies comments made in each category and provides those comment excerpts organized by
11 comment category.

12 As a result of the scoping process, the NRC identified and eliminated peripheral issues that will
13 not be covered in the Waste Confidence GEIS. The Scoping Summary Report provides
14 responses that either discuss why particular topics or concerns are outside the scope of the
15 GEIS or indicates concerns or topics that are in scope and will be evaluated in the GEIS.

16 Further detail regarding scoping, public comments received, and the NRC's responses can be
17 found in the full text of the Scoping Summary Report. Comments received on the draft GEIS
18 will be included in Appendix D of the final GEIS.

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Appendix B

Technical Feasibility of Continued Storage and Repository Availability

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Appendix B

Technical Feasibility of Continued Storage and Repository Availability

1 **B.1 Introduction**

2 In this *Waste Confidence Generic Environmental Impact Statement* (draft GEIS), the NRC
3 addresses the environmental impacts of continuing to store spent nuclear fuel (spent fuel) at a
4 reactor site or at an away-from-reactor storage facility, after the end of a reactor's licensed life
5 for operation until final disposition in a geologic repository ("continued storage"). This draft
6 GEIS, if adopted, would provide a regulatory basis for the U.S. Nuclear Regulatory
7 Commission's (NRC's) proposed amendment to Part 10 of the *Code of Federal Regulations*
8 (CFR) 51.23. Historically, the Waste Confidence decision contained five "findings" that
9 addressed technical feasibility of a mined geologic repository, the degree of assurance that
10 disposal would be available by a certain time, and the degree of assurance that spent fuel and
11 high-level waste could be managed safely without significant environmental impacts for a
12 certain period beyond the expiration of plants' operating licenses. Preparation of and reliance
13 upon a GEIS is a fundamental departure from the approach used in past Waste Confidence
14 proceedings. This draft GEIS acknowledges the uncertainties in the Commission's prediction of
15 repository availability and provides an environmental analysis of any reasonably foreseeable
16 timeframes. To this end the draft GEIS considers a number of possible timeframes for
17 repository availability, including the impacts from never having a repository.

18 The NRC's underlying conclusions regarding the technical feasibility for continued storage and
19 repository availability, based on the best available information, continue to undergird its
20 environmental analyses. These underlying conclusions, which are relevant to an analysis of the
21 potential environmental impacts assessed in this draft GEIS, are discussed as two broad issues
22 in this appendix: the NRC's technical information as to the availability of a repository for
23 disposal of spent fuel generated in a power reactor (Section B.2) and the technical feasibility of
24 safe storage of spent fuel in an at-reactor or away-from-reactor storage facility until sufficient
25 repository capacity becomes available (Section B.3). These two broad issues were addressed
26 in the five findings contained in earlier versions of the Waste Confidence decision. The same
27 issues will be addressed in this appendix, but the information is presented under these two
28 broad topic areas rather than "five findings."

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1 **B.2 Repository Capacity will be Available to Dispose of Spent** 2 **Fuel**

3 The NRC must answer two questions to determine whether sufficient repository capacity will be
4 available to dispose of spent fuel at the end of the short-term storage timeframe: whether a
5 repository is technically feasible and, if so, how long will it take to site, license, construct, and
6 open a repository. “Technical feasibility” simply means whether a geologic repository is
7 technically possible using existing technology (i.e., without any fundamental breakthroughs in
8 science and technology). If technically feasible, then the question becomes what is a
9 reasonable timeframe for the siting, licensing, construction, and opening of a geologic
10 repository. Both of these questions are discussed in detail below in Sections B.2.1 (Technical
11 Feasibility of a Repository) and B.2.2 (Availability of Repository Capacity).

12 **B.2.1 Technical Feasibility of a Repository**

13 Historically, the Commission has consistently determined that current knowledge and
14 technology support the technical feasibility of deep geologic disposal. In its original 1984 Waste
15 Confidence decision, the NRC stated that “[t]he Commission finds that safe disposal of [high-
16 level radioactive waste and spent nuclear fuel] is technically *possible* and that it is achievable
17 using *existing* technology” (49 FR 34658) (emphasis added). The Commission then stated:
18 “Although a repository has not yet been constructed and its safety and environmental
19 acceptability demonstrated, no fundamental breakthrough in science or technology is needed to
20 implement a successful waste disposal program.” Though the Commission has revisited its
21 Waste Confidence decision since 1984, this focal point – whether a fundamental breakthrough
22 in science or technology is needed – continues to guide the Commission’s consideration of the
23 feasibility of commercial nuclear waste disposal. Since 1984, the technical feasibility of a
24 geological repository has moved significantly beyond a theoretical concept.

25 Today, the consensus within the scientific and technical community engaged in nuclear waste
26 management is that safe geologic disposal is achievable with currently available technology
27 (see, e.g., Blue Ribbon Commission on America’s Nuclear Future 2012, Section 4.3). Currently,
28 25 countries, including the United States, are considering disposal of spent or reprocessed
29 nuclear fuel in deep geologic repositories. Repository programs in other countries, which
30 continue to provide additional information useful to the U.S. program, are actively considering
31 crystalline rock, clay, and salt formations as repository host media (IAEA 2005). Many of these
32 programs have researched these geologic media for several decades.

33 Ongoing research in both the United States and other countries supports a conclusion that
34 geological disposal remains viable and that acceptable sites can be identified. Despite decades
35 of research into various geological media, no insurmountable technical or scientific problem has
36 emerged to challenge the idea that safe disposal of spent fuel and high-level radioactive waste
37 can be achieved in a mined geologic repository. Over the past two decades, significant

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1 progress has been made in the scientific understanding and technological development needed
2 for geologic disposal. A number of reports, including the following examples, document the
3 experience gained at an international level on geological disposal:

- 4 • “Geological Repository Systems for Safe Disposal of Spent Nuclear Fuels and Radioactive
5 Wastes” (Ahn and Apted 2010)
- 6 • “Scientific and Technical Basis for the Geologic Disposal of Radioactive Wastes, Technical
7 Reports Series No. 413” (IAEA 2003a)
- 8 • “Lessons Learned from Ten Performance Assessment Studies” (Nuclear Energy Agency
9 1997)
- 10 • “Radioactive Waste Management Studies and Trends, IAEA/WMDB/ST/4” (IAEA 2005)
- 11 • “The Use of Scientific and Technical Results from Underground Research Laboratory
12 Investigations for the Geologic Disposal of Radioactive Waste” (IAEA 2001)
- 13 • “Joint Convention on Safety of Spent Fuel Management and on Safety of Radioactive Waste
14 Management, INFCIRC/546” (IAEA 1997)

15 In the United States, the recent report by the Blue Ribbon Commission on America’s Nuclear
16 Future (Blue Ribbon Commission 2012) supported geologic disposal by concluding that:

17 “geologic disposal in a mined repository is the most promising and technically
18 accepted option available for safely isolating high-level nuclear wastes for very
19 long periods of time. This view is supported by decades of expert judgment and
20 by a broad international consensus. All other countries with spent fuel and high-
21 level waste disposal programs are pursuing geologic disposal. The United
22 States has many geologic media that are technically suitable for a repository.”

23 In addition, support for the feasibility of geologic disposal can be drawn from experience gained
24 from the review of the U.S. Department of Energy’s (DOE’s) Yucca Mountain, Nevada, license
25 application (DOE 2008). On June 3, 2008, the DOE submitted an application for a construction
26 authorization to the NRC, and on September 8, 2008, the NRC notified DOE that it found the
27 application acceptable for docketing (73 FR 53284) and began its review. Although DOE
28 subsequently filed a motion with an NRC Atomic Safety and Licensing Board seeking
29 permission to withdraw the license application for a high-level nuclear waste repository at Yucca
30 Mountain (NRC 2010a), the NRC’s review continued until September 2011. The NRC’s review
31 did not identify any issues that would challenge the feasibility of geological disposal. This
32 conclusion is reflected in two technical review documents: NUREG–2108, “Technical
33 Evaluation Report on the Content of the U.S. Department of Energy Yucca Mountain Repository
34 License Application - Preclosure Volume: Repository Safety Before Permanent Closure” (NRC
35 2011a) and NUREG–2107, “Technical Evaluation Report on the Content of the U.S. Department
36 of Energy’s (DOE’s) Yucca Mountain Repository License Application” (NRC 2011b). These
37 documents contain the NRC technical reviews of the DOE license application for Yucca
38 Mountain in the areas of safety before and after permanent closure.

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1 The technical feasibility of a deep geologic repository is further supported by current DOE
2 defense-related activities. The DOE sited and constructed, and since March 1999 has been
3 operating a deep geologic repository for defense-related transuranic radioactive wastes near
4 Carlsbad, New Mexico. This Waste Isolation Pilot Plant is located in the Chihuahuan Desert of
5 southeastern New Mexico, approximately 42 km (26 mi) east of Carlsbad. The facility is used to
6 store transuranic waste from nuclear weapons research and testing operations from past
7 defense activities. Project facilities include mined disposal rooms 655 m (2,150 ft) underground.

8 Recently, in January 2013, the DOE released “Strategy for the Management and Disposal of
9 Used Nuclear Fuel and High-Level Radioactive Waste,” a response to the Blue Ribbon
10 Commission on America’s Nuclear Future’s report (DOE 2013). In this strategy document, DOE
11 presents a framework for “moving toward a sustainable program to deploy an integrated system
12 capable of transporting, storing, and disposing of used nuclear fuel and high-level radioactive
13 waste from civilian nuclear power generation...” (DOE 2013). This new DOE strategy includes
14 a nuclear waste-management system consisting of a pilot interim storage facility, a larger full-
15 scale interim storage facility, and a geologic repository. U.S. policy remains that geologic
16 disposal is the appropriate long-term solution for disposition of spent fuel and high-level
17 radioactive waste.

18 Finally, the activities of European countries support the technical feasibility of a deep geologic
19 repository. In late 2012, a Finish nuclear-waste-management company (Posiva) submitted a
20 construction licence application for a geological repository for spent fuel to Finland’s Radiation
21 and Nuclear Safety Authority, and in spring 2011, Swedish nuclear authorities accepted an
22 application from the Swedish Nuclear Fuel and Waste Management Company for permission to
23 build a repository for spent fuel. Based on the national and international information and
24 experience with geological disposal, the NRC concludes that a geologic repository continues to
25 be technically feasible.

26 **B.2.2 Availability of Repository Capacity**

27 Given the international consensus that geologic repositories are technically feasible,
28 international experience is also relevant in determining the timeframe to successfully site,
29 license, construct, and open a repository. Of the 24 countries, other than the United States,
30 considering disposal of spent or reprocessed nuclear fuel in deep geologic repositories, 10 have
31 established target dates for the availability of a repository.¹ The majority of the 14 countries with
32 no established target date for repository availability rely on centralized interim storage, which
33 may include a protracted period of at-reactor storage before shipment to a centralized facility.

¹ The three countries with target dates that plan direct disposal of spent fuel are: Czech Republic (2050), Finland (2020), and Sweden (2025). The seven countries with target dates for disposal of reprocessed spent fuel and high-level radioactive waste are: Belgium (2035), China (2050), France (2025), Germany (2025), Japan (2030s), Netherlands (2103), and Switzerland (2042).

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1 The process of consensus building, by which time is taken to build support from potential host
2 communities, is most evident from repository-development programs in Finland and Sweden. In
3 Finland, preliminary site investigations started in 1986 and detailed characterizations of four
4 locations were performed between 1993 and 2000. In 2001, the Finnish Parliament ratified the
5 Government's decision to proceed with a repository project at a chosen site only after the
6 1999 approval by the municipal council of the host community. In December 2012, Posiva
7 submitted a construction license application for a final repository that will hold spent fuel from
8 Finland's nuclear reactors (Posiva 2011). Finland expects this facility to begin receipt of spent
9 fuel for disposal in 2020, 34 years after the start of preliminary site investigations.

10 Between 1993 and 2000, Sweden conducted feasibility studies in eight municipalities. One site
11 was found technically unsuitable and two sites were eliminated by municipal referenda. Three of
12 the remaining five sites were selected for detailed site investigations. Municipalities adjacent to
13 two of these sites agreed to be potential hosts and one refused. Since 2007, detailed site
14 investigations have been conducted for the sites located in the Oesthammer and Oskarshamn
15 municipalities, both of which already host nuclear power stations. On June 3, 2009, the Swedish
16 Nuclear Fuel and Waste Management Company selected the Forsmark Site located in the
17 Oesthammer municipality for the Swedish spent fuel repository. The Swedish Nuclear Fuel and
18 Waste Management Company submitted a license application in spring 2011. A government
19 decision is expected in 2015. If Swedish authorities authorize construction, the repository could
20 be available for disposal around 2025, about 30 years after feasibility studies began.

21 In the United States, the Blue Ribbon Commission on America's Nuclear Future recommended
22 "prompt efforts to develop one or more geologic disposal facilities" (Blue Ribbon Commission
23 2012). In response, the DOE (2013) stated that the "goal is to have a repository sited by 2026;
24 the site characterized, and the repository designed and licensed by 2042; and the repository
25 constructed and its operations started by 2048." Consistent with the discussion in the 2010
26 Waste Confidence rulemaking (75 FR 81037) and subsequent events, the NRC continues to
27 believe that 25 to 35 years is a reasonable period for repository development (e.g., candidate
28 site selection and characterization, final site selection, licensing review, and initial construction
29 for acceptance of waste).

30 Another important consideration is that broader institutional issues affect the time it will take to
31 implement geologic disposal. International and domestic experience have made it clear that
32 technical knowledge and experience alone are not sufficient to bring about the broad social and
33 political acceptance needed to construct a repository. The time needed to develop a societal
34 and political consensus for a repository could add to the time to site and license a repository or
35 overlap it to some degree.

36 Inasmuch as the availability of a repository can be substantially affected by whatever process is
37 employed to achieve a national consensus on repository site selection, this draft GEIS offers
38 three alternative timeframes for continued storage that reflect significant differences in the

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1 availability of the repository. The short-term timeframe considered in this draft GEIS assumes a
2 repository is available 60 years after the end of a reactor's licensed life for operation. The long-
3 term storage timeframe assumes a repository is not available for an additional 100 years
4 beyond the short-term storage timeframe, which means a repository would be available
5 160 years after the end of a reactor's licensed life for operation. In recognition of the uncertainty
6 in reaching a national consensus on repository site selection, the third timeframe assumes that
7 a repository never becomes available and the spent fuel needs to be stored indefinitely.

8 In the 2010 Waste Confidence decision, the Commission assessed the length of time that would
9 be needed to site, license, construct, and open a repository. This analysis moved away from
10 the Commission's historical practice of specifying a "target date," and instead concluded that a
11 repository would be available "when necessary." The Commission's reluctance to select a
12 target date was not indicative of an inability to predict the length of the process for siting,
13 constructing, licensing, and opening a repository, but rather that identification of a specific year
14 as a starting point was uncertain. Based on experience in licensing similarly complex facilities
15 in the United States and national and international experience with repositories already in
16 progress, the NRC concludes the time period needed to develop a repository is approximately
17 25 to 35 years.

18 **B.3 Technical Feasibility of Safe Storage**

19 Spent fuel removed from a reactor is initially placed in a spent fuel pool for cooling. After
20 several years (about 5 years for low-burnup fuel and up to 20 years for high-burnup fuel), the
21 spent fuel is sufficiently cooled that it can be placed in dry cask storage assuming current
22 storage configurations and heat loads. After the end of a reactor's licensed life for operations,
23 spent fuel is stored in onsite spent fuel pools or in an at-reactor or away-from-reactor dry cask
24 storage systems.

25 In its initial Waste Confidence decision in 1984, the Commission found that spent fuel can be
26 stored safely and without significant environmental impacts for at least 30 years beyond the
27 expiration of a reactor's licensed life for operation (49 FR 34658). This conclusion focuses on
28 whether reactor licensees can safely store their spent fuel in the period between the cessation
29 of reactor operations and the availability of repository capacity for their fuel. In 1990, the
30 Commission reaffirmed its conclusion and further determined that if a reactor's operating license
31 were renewed, storage would be safe and without significant environmental impacts for at least
32 30 years beyond a reactor's licensed life for operations for a total of at least 100 years
33 (55 FR 38474). In both its 1984 and 1990 rulemaking, the Commission looked at four broad
34 issues in assessing the technical feasibility of storage:

- 35 1. the long-term integrity of spent fuel under water pool storage conditions
- 36 2. the structure and component safety for extended facility operation for storage of spent fuel in
37 water pools

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1 3. the safety of dry storage

2 4. the potential risks of accidents and acts of sabotage at spent fuel storage facilities
3 (49 FR 34658; 55 FR 38472; 75 FR 81037)

4 The Commission found that spent fuel would be managed safely because, under either a
5 possession-only 10 CFR Part 50 license or a 10 CFR Part 72 license, the utility would remain
6 under the NRC's regulatory control and, thus, NRC inspections and oversight of storage
7 facilities would continue (49 FR 34658; 55 FR 38472). In 1990, when extended storage at the
8 reactor site seemed more probable, the Commission noted that 10 CFR Part 72 allowed for
9 license renewals and that the NRC was considering issuance of a general 10 CFR Part 72
10 license under which spent fuel could be stored in NRC-certified casks (55 FR 38472). The
11 Commission reasoned that these regulations would provide additional NRC supervision of spent
12 fuel management.

13 Continued storage of spent fuel at at-reactor or away-from-reactor sites will be necessary until a
14 repository is available for permanent disposal. The storage of spent fuel in any combination of
15 storage (spent fuel pools or dry casks) will continue as a licensed activity under regulatory
16 controls and oversight. Nonetheless, the conclusions reached by the NRC in the draft GEIS
17 regarding the technical feasibility of continued storage do not rely solely on NRC's regulatory
18 framework governing these activities. Rather, these conclusions are also based on NRC's
19 experience with the actual storage of spent fuel under this regulatory framework and the
20 continued application of proven fuel-storage methodologies. Continued safe storage of spent
21 fuel requires both the technical feasibility of storage methods and a regulatory framework that
22 provides for monitoring and oversight to address the potential for evolving issues. The technical
23 feasibility of wet storage in spent fuel pools and dry casks are discussed separately in
24 Sections B.3.1 and B.3.2. The regulatory framework applicable to both wet and dry storage is
25 discussed in Section B.3.3.

26 **B.3.1 Technical Feasibility of Wet Storage**

27 The technical feasibility of continued storage in spent fuel pools is supported by a number of
28 technical considerations. First, the integrity of spent fuel and cladding (e.g., structurally sound
29 such that the spent fuel can be handled by normal means) within the benign environment of the
30 spent fuel pool's controlled water chemistry is supported by operational experience and a
31 number of scientific studies, some of which are summarized below. Further, the spent fuel
32 pool's robust structural design protects against a range of natural and human-induced
33 challenges, which are discussed in detail in the following sections and in the body of the draft
34 GEIS.

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1 **B.3.1.1 Integrity of Spent Fuel and Cladding in Spent Fuel Pools**

2 In 1984, the NRC provided information supporting the low degradation rates of spent fuel in
3 spent fuel pools based on national and international storage experience, which at that time
4 totaled 18 years of experience with zirconium-clad fuel² and 12 years of experience with
5 stainless-steel-clad fuel (49 FR 34658). Examples of the cited information are:

- 6 1. In “Behavior of Spent Nuclear Fuel in Water Pool Storage,” Johnson (1977) reported on
7 corrosion studies of irradiated fuel at 20 reactor pools in the United States, finding no
8 detectable degradation of zirconium cladding.
- 9 2. At the American Nuclear Society’s Executive Conference on Spent Fuel Policy and its
10 Implications, presented in Buford, Georgia, April 2 to 5, 1978, Johnson, Jr. (1978) presented
11 “Utility Spent Fuel Storage Experience,” which reported that no degradation has been
12 observed in commercial power reactor fuel stored in onsite pools in the United States and
13 that extrapolation of corrosion data suggests that less than a tenth of a percent of the
14 thickness of the zirconium clad would be corroded after 100 years.
- 15 3. In “The Long-Term Storage of Irradiated CANDU Fuel Under Water,” Walker (1979)
16 concluded that “50 to 100 years under water should not significantly affect their [spent fuel
17 bundles] integrity.”

18 Almost 30 years of additional experience has been gained since the publication of the first
19 Waste Confidence rulemaking in 1984, during which time the technical basis for very slow
20 degradation rates of spent fuel in spent fuel pools has continued to grow. Examples of this
21 additional experience include the following:

- 22 1. In “Durability of Spent Nuclear Fuels and Facility Components in Wet Storage,” the IAEA
23 (1998) summarized the durability of materials in wet storage, stating: “The zirconium alloys
24 represent a class of materials that is highly resistant to degradation in wet storage, including
25 some experience in aggressive waters. The only adverse experience involves Zircaloy clad
26 metallic uranium where mechanical damage to the cladding was a prominent factor during
27 reactor discharge, exposing the uranium metal fuel to aqueous corrosion. Otherwise, the
28 database for the zirconium alloys supports a judgment of satisfactory wet storage in the time
29 frame of 50 to 100 years or more.”
- 30 2. In “Spent Fuel Performance Assessment and Research: Final Report of a Co-Ordinated
31 Research Project on Spent Fuel Performance Assessment and Research (SPAR)
32 1997–2001,” the IAEA (2003b), while discussing spent fuel storage experience reported on
33 a detailed review of the degradation mechanisms of spent fuel cladding under wet storage
34 and stated that “wet storage of spent fuel only appears to be limited by adverse pool
35 chemistry or the deterioration of the fuel storage pool structure.”

² In 1984, only two commercial light water reactor nuclear power plants used stainless-steel-clad fuel, whereas most used zirconium-clad fuel (49 FR 34658).

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1 3. In “Understanding and Managing Ageing of Materials in Spent Fuel Storage Facilities,” the
2 IAEA (2006) reported that “[O]ver more than 40 years of experience with several million
3 LWR rods, power reactor fuel with zirconium ~~allow~~-alloy cladding has had an excellent
4 durability in wet storage” (IAEA 2006). The IAEA went on to state that “[D]estructive and
5 non-destructive examinations of fuel rods, visual evidence and coupon studies [IAEA 2006;
6 pp. 11, 13, 54–58] all support resistance to aqueous corrosion. There have been no reports
7 of fission gas evolution, indicative of cladding failure in wet storage. Rod consolidation
8 campaigns have been conducted without any indication of storage induced degradation.
9 There is a sufficient database to indicate that wet storage of fuel with ~~Zirconium-zirconium~~
10 alloy cladding can be extended for at least several decades.”

11 Based on available information and operational experience, degradation of the fuel cladding
12 occurs very slowly over time in the spent fuel pool environment. Degradation of the spent fuel
13 should be minimal over the short-term storage timeframe. Thus, it is expected that only routine
14 maintenance will be needed over the short-term storage timeframe. In the draft GEIS, the NRC
15 assumes that the spent fuel pool will be decommissioned before the end of the short-term
16 storage timeframe; however, the NRC is not aware of any information that would call into
17 question the technical feasibility of continued safe storage of spent fuel in spent fuel pools
18 beyond the short-term storage timeframe.

19 **B.3.1.2 Robust Structural Design of Spent Fuel Pools**

20 As described in Section 2.1.2.1 of the draft GEIS, spent fuel pools are massive, seismically-
21 designed structures that are constructed from thick, reinforced concrete walls and slabs that
22 vary between 0.7 and 3 m (2 and 10 ft) thick. All spent fuel pools currently in operation are lined
23 with stainless-steel liners that vary in thickness from 6 to 13 mm (0.25 to 0.5 in.).³ Per
24 NUREG–1738 (NRC 2001), “Technical Study of Spent Fuel Pool Accident Risk at
25 Decommissioning Nuclear Power Plants,” spent fuel pool structures are designed to be
26 seismically robust (i.e., it is expected that a seismic event with peak spectral acceleration
27 several times larger than the safe shutdown earthquake would be required to produce
28 catastrophic failure of the structure). Further, the NRC (2001) in evaluating the seismic risk to
29 spent fuel pools states that “In boiling-water reactor (BWR) plants, the pool structures are
30 located in the reactor building at an elevation several stories above the ground. In pressurized-
31 water reactor (PWR) plants, the [spent fuel pool] structures are outside the containment
32 structure and supported on the ground or partially embedded in the ground. The location and
33 supporting arrangement of the pool structures affect their capacity to withstand seismic ground
34 motion beyond their design basis. The dimensions of the pool structure are generally derived

³ The sole exceptions are Dresden Unit 1 and Indian Point Unit 1, which have no liner plates. Both plants were permanently shut down more than 20 years ago and no safety-significant degradation of their concrete pool structures has been reported. At present, no spent fuel remains in either reactor’s spent fuel pool.

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1 from radiation shielding considerations rather than seismic demand needs. Spent fuel
2 structures at nuclear power plants are able to withstand loads substantially beyond those for
3 which they were designed.”

4 In its initial Waste Confidence decision, the Commission found that the risks of major accidents
5 at spent fuel pools resulting in offsite consequences were remote because of the secure and
6 stable character of the spent fuel in the storage pool environment and the absence of reactive
7 phenomena that might result in dispersal of radioactive material. The Commission noted that
8 storage pools and independent spent fuel storage installations (ISFSIs) are designed to safely
9 withstand accidents caused by either natural or man-made phenomena (49 FR 34658). By
10 1990, the NRC had spent several years studying the potential for a catastrophic loss of reactor
11 spent fuel pool water, which could cause a fuel fire in a dry pool. The NRC concluded that,
12 because of the large inherent safety margins in the design and construction of a spent fuel pool,
13 no action was needed to further reduce the risk (55 FR 38472). On March 11, 2011, an
14 earthquake and subsequent tsunami resulted in significant damage to the nuclear facilities at
15 Fukushima Dai-ichi. Subsequent analysis and inspections performed by Tokyo Electric Power
16 Company personnel determined that the spent fuel pool water levels did not drop below the top
17 of fuel in any spent fuel pool and that no significant fuel damage occurred (INPO 2011).
18 Appendix F contains further discussion of the Fukushima event with respect to spent fuel pools.

19 The NRC has continued its examination of spent fuel pool storage to ensure that adequate
20 safety is maintained and that there are no adverse environmental effects from the storage of
21 spent fuel in spent fuel pools. The Office of Nuclear Reactor Regulation and the former Office
22 for Analysis and Evaluation of Operational Data independently evaluated the safety of spent fuel
23 pool storage, and the results of these evaluations were documented in a pair of memoranda to
24 the Commission. The first memorandum “Resolution of Spent Fuel Storage Pool Action Plan
25 Issues,” (NRC 1996a) was dated July 26, 1996. The second memorandum “Assessment of
26 Spent Fuel Pool Cooling,” (NRC 1996b) was dated October 3, 1996 and later published as
27 NUREG–1275, Vol. 12, “Operating Experience Feedback Report: Assessment of Spent Fuel
28 Cooling” (NRC 1997a). As a result of these studies, the NRC and industry identified a number
29 of follow-up activities, which are described by the NRC in a memorandum to the Commission
30 dated September 30, 1997, “Follow-up Activities on the Spent Fuel Pool Action Plan,” (NRC
31 1997b). These evaluations subsequently became part of the investigation of Generic Safety
32 Issue 173, “Spent Fuel Pool Storage Safety,” which found that the relative risk posed by loss of
33 spent fuel cooling is low compared with the risk of events not involving the spent fuel pool.

34 The safety and environmental effects of spent fuel pool storage were also addressed in
35 conjunction with regulatory assessments of permanently shutdown nuclear plants and
36 decommissioning nuclear power plants. NUREG/CR–6451, “A Safety and Regulatory
37 Assessment of Generic BWR and PWR Permanently Shutdown Nuclear Power Plants” (Travis
38 et al. 1997), addressed the appropriateness of regulations (e.g., requirements for emergency

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1 planning and insurance) associated with spent fuel pool storage. The study also provided
2 reasonably bounding estimates for offsite consequences for the most severe accidents, which
3 would involve draining of the spent fuel pool (e.g., complete draining of the spent fuel pool
4 occurs 12 days after shutdown of the reactor).

5 In 2001, the NRC issued NUREG–1738 (NRC 2001), “Technical Study of Spent Fuel Pool
6 Accident Risk at Decommissioning Nuclear Power Plants,” which found that a postulated
7 accident causing zirconium cladding fires could result in unacceptable offsite doses.
8 Appendix F of this draft GEIS presents some results from the NRC (2001), including the largest
9 number of early fatalities calculated (i.e., 191). The large number of calculated fatalities was
10 due, in part, to conservative assumptions for the ruthenium release (i.e., the release fraction is
11 for a volatile fission product in an oxidic [rather than metallic] form), time of the accident (i.e.,
12 30 days after shutdown of the reactor), and late evacuation of the public. More realistic
13 assumptions (e.g., low ruthenium release, event occurs one year after shutdown), reduce the
14 largest number of early fatalities to approximately two (NRC 2001). Although early fatalities are
15 unacceptable, the likelihood for such an accident to occur was estimated to be less than three
16 chances in one million (NRC 2001). The NRC (2001) further states that “[T]he risk at
17 decommissioning plants is low and well within the Commission's safety goals. The risk is low
18 because of the very low likelihood of a zirconium fire even though the consequences from a
19 zirconium fire could be serious.” In arriving at this conclusion, the NRC (2001) considered a
20 wide range of initiating events, including but not limited to, events that might lead to rapid loss of
21 pool water (e.g., seismic events, cask drop, aircraft impact, and missiles generated by
22 tornados). The low probability for these varied events to initiate a rapid loss of water from the
23 pool is a direct result of the robustness of the structural design of the spent fuel pool.

24 Spent fuel pools are massive, structures constructed from thick, reinforced concrete walls and
25 slabs designed to be seismically robust. Thus, the likelihood of major accidents at spent fuel
26 pools resulting in offsite consequences ~~are~~ **is** very remote. In particular, Appendix F determined
27 that the environmental impacts from spent fuel pool fires are SMALL during the short-term
28 storage timeframe based on the low risk of a spent fuel pool fire. The NRC is not aware of any
29 additional studies that would cause it to question the low risk of spent fuel pool accidents and
30 thereby question the technical feasibility of continued safe storage of spent fuel in spent fuel
31 pools for the short-term timeframe considered in the draft GEIS.

32 **B.3.2 Technical Feasibility of Dry Cask Storage**

33 The technical feasibility of dry cask storage is supported by years of experience and technical
34 studies and NRC reviews that examined and confirmed the integrity of spent fuel and cladding
35 under the controlled and benign environment within dry cask storage systems. The technical
36 feasibility of these systems is further supported by the robustness of the structural design of the
37 dry cask storage system against a variety of challenges both natural and human-induced.
38 Those features are discussed in more detail below.

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1 **B.3.2.1 Low Degradation Rates of Spent Fuel in Dry Cask Storage**

2 In the United States, spent fuel has been safely stored in dry casks for more than 25 years. In
3 1986, Virginia Power received a license for an at-reactor dry storage facility located at Surry
4 Nuclear Power Plant. Today, 69 independent spent fuel storage installations (ISFSIs) are
5 licensed to operate in the United States, which represents, at the beginning of 2012,
6 1,700 loaded dry casks in 34 states (see Section 2.1.2 in the draft GEIS for further details). As
7 with wet storage, the overall experience with dry cask storage of similar fuel types, including the
8 cladding, has been similar—slow degradation. In addition, spent fuel is cooled for a lengthy
9 period in a spent fuel pool before being transferred into dry cask storage. NRC guidance
10 regarding dry cask storage recommends a maximum cladding temperature of 400°C and a dry,
11 inert atmosphere to reduce the potential for significant degradation (NRC 2010b). Recent
12 studies, including the following, have confirmed dry cask storage reliability:

- 13 1. A dry cask storage characterization project (Bare et al. 2001) examined and tested a dry
14 cask storage system, the CASTOR V/21, and found “there was no evidence of cask,
15 shielding, or fuel rod degradation during long-term (14 years) storage that would affect cask
16 performance or fuel integrity.” The project examined zirconium-clad fuel applicable for spent
17 fuel with a burnup of 35 GWd/MTU. A subsequent study (Einzigler et al. 2003), which
18 examined spent fuel from the Bare et al. 2001 project, suggests that the spent fuel cladding
19 could remain a viable barrier to fission product release during extended storage up to
20 100 years in a dry cask environment.
- 21 2. The International Atomic Energy Agency (IAEA 2006) status report entitled ‘Understanding
22 and Managing Ageing of Materials in Spent fuel Storage Facilities’ stated “[P]ower reactor
23 fuel with zirconium alloy cladding has been placed into dry storage in approximately a dozen
24 countries. The technical basis for satisfactory dry storage of fuel clad with zirconium alloys
25 includes hot cell tests on single rods, whole assembly tests, demonstrations using casks
26 loaded with irradiated fuel assemblies and theoretical analysis.”
- 27 3. The Electric Power Research Institute (EPRI 1998) evaluated the data needs for long-term
28 storage and reported that during normal storage of low burnup spent fuel, “the lower
29 radiation fields and estimated temperatures of 100–125°C after 20 years favor acceptable
30 fuel behavior for extended storage.”

31 Current-design of low-burnup light water reactor uranium-oxide-based fuel and fuel from a high-
32 temperature gas-cooled reactor have been successfully stored in dry storage facilities for over
33 20 years. The NRC allows for a license renewal for up to a 40-year term, subject to certain
34 requirements (e.g., an aging management program for management of issues associated with
35 aging that could adversely affect structures, systems, and components important to safety
36 [10 CFR 72.42]). Although the current record for dry cask storage supports the technical
37 feasibility of continued safe storage, the NRC constantly works to investigate and monitor the

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1 behavior of spent fuel storage systems to identify any unexpected and deleterious safety
2 conditions before there are adverse impacts (NRC 2013).

3 For example, the NRC is aware of concerns regarding potential detrimental effects of hydride
4 reorientation on cladding behavior (e.g., reduced ductility). Reduced ductility, which makes the
5 cladding more brittle, increases the difficulty of keeping spent fuel assemblies intact during
6 handling and transportation. Research performed in Japan and the United States (Billone et al.
7 2013) indicated that: (1) hydrides could reorient at a significantly lower stress than previously
8 believed and (2) high-burnup fuel could exhibit a higher ductile-to-brittle transition temperature
9 due to the presence of radial hydrides. This phenomenon could influence the approach used for
10 repackaging spent fuel but the NRC is not aware of information that would require it to conclude
11 that high-burnup fuel would need to be repackaged during the short-term timeframe defined in
12 the draft GEIS. Should spent fuel cladding be more brittle, greater care could be required
13 during handling operations, regardless of when repackaging would occur, to limit the potential
14 for damage to spent fuel assemblies that could affect easy retrievability of the spent fuel and
15 complicate repackaging operations.

16 Based on available information and operational experience, degradation of the spent fuel
17 should be minimal over the short-term storage timeframe if conditions inside the canister are
18 appropriately maintained (e.g., consistent with the technical specifications for storage). Thus, it
19 is expected that only routine maintenance will be needed over the short-term storage timeframe.
20 Repackaging of spent fuel may be needed if storage continues beyond the short-term storage
21 timeframe. In the draft GEIS, the NRC conservatively assumes that the dry casks
22 would need to be replaced if storage continues beyond the short-term storage timeframe.
23 The NRC assumes replacement of dry casks after 100 years of service life, even though studies
24 and experience to date do not preclude a longer service life. Accidents associated with
25 repackaging spent fuel are evaluated in Section 4.18 and the environmental impacts are SMALL
26 because the accident consequences would not exceed the NRC accident dose standard
27 contained in 10 CFR 72.106. The NRC is not aware of any additional studies that would cause
28 it to question the technical feasibility of continued safe storage of spent fuel in dry casks for the
29 timeframes considered in the draft GEIS. The NRC continues to evaluate aging management
30 programs and to monitor dry cask storage so that it can update its service life assumptions as
31 necessary and consider any circumstances that might require repackaging spent fuel earlier
32 than anticipated.

33 **B.3.2.2 Robust Design of Dry Cask Storage Systems**

34 Dry cask storage systems are passive systems (i.e., relying on natural air circulation for cooling)
35 that are inherently robust, massive, and highly resistant to damage. To date, the NRC and
36 licensee experience with ISFSIs and cask certification indicates that spent fuel can be safely
37 and effectively stored using passive dry cask storage technology. There have not been any
38 safety issues with dry cask storage.

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1 In addition, the NRC's technical review supporting issuance of Materials License
2 No. SNM-2513 for the Private Fuel Storage, LLC (PFS) facility has confirmed the technical
3 feasibility of continuing storage at an away-from-reactor ISFSI under 10 CFR Part 72. While
4 issues extraneous to safety and protection of the environment prevented the licensee from
5 going forward with the project,⁴ the NRC's extensive review of safety and environmental issues
6 associated with construction and operation of the PFS facility provides further information
7 supporting the technical feasibility that spent fuel can be safely stored at an away-from-reactor
8 ISFSI for long periods following storage at a reactor site (i.e., in a spent fuel pool or at-reactor
9 ISFSI).

10 The NRC has renewed three specific ISFSI licenses for an extended 40-year period under
11 exemptions granted from 10 CFR Part 72, which originally provided for 20-year renewals.
12 The NRC published a final rule on February 16, 2011, to clarify the processes for the renewal
13 of ISFSIs operated under the general license provisions of 10 CFR Part 72, for renewal of the
14 Certificate of Compliance for dry cask storage systems, and for extending the license and
15 renewal terms to 40 years (76 FR 8872). In these cases, the NRC's technical review has
16 encompassed the applicant's evaluation of aging effects on the structures, systems, and
17 components important to safety, supplemented by a licensee's aging management program.
18 These comprehensive reviews support the technical feasibility of continued safe storage of
19 spent fuel in these ISFSIs and thus reaffirm the technical feasibility of safe, interim dry storage
20 for an extended period. While these license renewal cases address storage at an ISFSI for a
21 period of up to 80 years (i.e., up to 40-year initial license, plus 40-year renewal), studies
22 performed to date (e.g., Einziger 2003; EPRI 2002; 55 FR 38472) have not identified any issues
23 that would call into question the technical feasibility of long-term use of dry storage for low-
24 burnup spent fuel.

25 In 2007, the NRC published a pilot probabilistic risk assessment methodology (NRC 2007) that
26 identified the dominant contributors to risk associated with a welded-canister dry-spent-fuel-
27 storage system at a specific boiling water reactor site. The NRC study developed and assessed
28 a comprehensive list of initiating events, including dropping the cask during handling and
29 external events during onsite storage (e.g., earthquakes, floods, high winds, lightning strikes,
30 accidental aircraft crashes, and pipeline explosions) and reported that the analysis indicates that
31 the overall risk of dry cask storage was found to be extremely low. (The NRC determined that
32 the estimated aggregate risk is an individual probability of a latent cancer fatality of 1.8×10^{-12}
33 during the period encompassing the initial cask loading and first year of service and 3.2×10^{-14}
34 per year during subsequent years of storage [NRC 2007]).

⁴ As a result of legal challenges involving issues outside of the NRC's jurisdiction, the proposed PFS ISFSI has not been constructed. On December 20, 2012, PFS submitted a request to the NRC to terminate its license (Private Fuel Storage 2012).

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1 Several characteristics of dry cask storage contribute to the low risk determined by the NRC
2 study. First, these systems are passive. Second, they rely on natural air circulation for cooling.
3 Third, they are made up of inherently robust, massive concrete and steel structures that are
4 highly resistant to damage. The robustness of these dry cask storage systems have been
5 tested by significant challenges (e.g., the August 23, 2011 Mineral, Virginia earthquake that
6 affected the North Anna Nuclear power plant and the March 11, 2011 earthquake and
7 subsequent tsunami that damaged the Fukushima Dai-ichi nuclear power plant). Neither event
8 resulted in significant damage to or the release of radionuclides from the dry cask storage
9 containers⁵ (VEPCO 2011; INPO 2011).

10 Thus, technical studies and practical operating experience to date confirm the physical integrity
11 of dry cask storage structures and thereby demonstrate the technical feasibility of continued
12 safe storage of spent fuel in dry cask storage systems for the time periods considered in the
13 draft GEIS. Further, it is expected that only routine maintenance will be needed over the
14 short-term storage timeframe. Repackaging of spent fuel may be needed if storage continues
15 beyond the short-term storage timeframe. In the draft GEIS, the NRC conservatively assumes
16 that the dry casks would need to be replaced if storage continues beyond the short-term storage
17 timeframe. The NRC assumes replacement of dry casks after 100 years of service life, even
18 though studies and experience to date do not preclude a longer service life. Environmental
19 impacts of accidents associated with repackaging spent fuel are evaluated in Section 4.18 and
20 found to be SMALL. The NRC is not aware of any additional studies that would cause it to
21 question the technical feasibility of continued safe storage of spent fuel in dry casks for the
22 timeframes considered in the draft GEIS. The NRC continues to evaluate aging management
23 programs and monitor dry cask storage so that it can update its service life assumptions as
24 necessary and consider any circumstances that might require repackaging of spent fuel earlier
25 than anticipated.

26 **B.3.3 Regulatory Oversight of Wet and Dry Spent Fuel Storage**

27 A strong regulatory framework that includes both regulatory oversight and licensee compliance
28 is important to the continued safe storage of spent fuel. As part of its oversight, the NRC can
29 issue orders and new or amended regulations to address emerging issues that could impact the
30 safe storage of spent fuel. This section provides a discussion of how the NRC's regulatory
31 program has addressed potential safety and security concerns and routine operations.
32 Significantly, the draft GEIS relies strictly upon the current regulatory regime to support its
33 environmental impact conclusions. Nonetheless, the NRC's upgrade of safety, environmental,
34 and security requirements following historic events such as the September 11, 2001 terrorist
35 attacks, and the more recent March 11, 2011 earthquake and subsequent tsunami that crippled
36 the Fukushima Dai-ichi nuclear power plant demonstrate the NRC's capability for prompt and

⁵ Dry casks at the Fukushima Dai-ichi nuclear power plant are stored in a shared dry cask storage building.

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1 vigorous response to new developments that warrant increased regulatory attention. Thus, the
2 vitality and evolution of the NRC's regulatory requirements support a reasonable conclusion that
3 continued storage, even over extended periods of time beyond those regarded as most likely,
4 will continue to be safe with the same or fewer environmental impacts.

5 **B.3.3.1 Regulatory Actions for Routine Operations, Accidents, and Terrorist Activity**

6 As part of its oversight, the NRC can issue orders and new or amended regulations to address
7 emerging issues that could impact the safe storage of spent fuel. For example, following the
8 terrorist attacks of September 11, 2001, the NRC undertook an extensive reexamination of
9 spent fuel safety and security issues. In 2002, the NRC issued orders to licensees that required
10 power reactors in decommissioning, spent fuel pools, and ISFSIs to enhance security and
11 improve their capabilities to respond to, and mitigate the consequences of, a terrorist attack.
12 For example, these orders required additional security measures, including increased patrols,
13 augmented security forces and capabilities, and more restrictive site-access controls to reduce
14 the likelihood of a successful terrorist attack. In 2007, the NRC issued a final rule revising the
15 Design Basis Threat (a design basis threat provides a general description of the attributes of
16 potential adversaries who might attempt to commit radiological sabotage or theft or diversion
17 against which licensee's physical protection systems must defend with high assurance), which
18 also increased the security requirements for power reactors and their spent fuel pools
19 (72 FR 12705). More recently, in 2009, the NRC issued a final rule to further improve security
20 measures at nuclear power reactors, including at spent fuel pools (74 FR 13926). This rule
21 includes improvements to security measures, such as enhancements to the cyber security plan,
22 facilitation of consistent application of preparatory actions with respect to air attacks, integration
23 of the access authorization and security program requirements, and additional requirements for
24 unarmed security personnel to ensure these personnel meet the minimum physical
25 requirements commensurate with their duties.

26 Section 4.19 of the draft GEIS describes the environmental impacts of potential acts of
27 sabotage or terrorism involving the continued storage of spent fuel. This section acknowledges
28 that as the immediate hazard posed by the high radiation levels of spent fuel diminishes over
29 time, depending on burnup, so does the deterrent to handling by unauthorized persons. ~~The
30 NRC will consider this type of information in evaluating whether additional security requirements
31 are warranted in the future. Additional security requirements may be necessary in the future,
32 should spent nuclear fuel remain in storage for a substantial period of time. If necessary, the
33 NRC will issue orders or enhance its regulatory requirements for ISFSI security, as appropriate,
34 to ensure adequate protection of public health and safety and the common defense and
35 security.~~

36 Other examples of the NRC's oversight are the additional requirements that the NRC has
37 already imposed or is considering in response to the March 11, 2011 earthquake and
38 subsequent tsunami that resulted in extensive damage to the six-unit Fukushima Dai-ichi

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1 nuclear power plant in Japan. On March 12, 2012, the NRC issued multiple orders and a
2 request for information to all of its nuclear power plant licensees. A request for information was
3 also issued to all licensees to determine whether nuclear plant licenses should be modified,
4 suspended, or revoked. The purpose of the request for information was to re-evaluate seismic
5 and flooding hazards at operating reactor sites and to determine whether appropriate staffing
6 and communication can be relied upon to coordinate event response during a prolonged station
7 blackout event, as was experienced at Fukushima Dai-ichi. Section 4.18 and Appendix F
8 provide further details regarding the NRC's orders and requests for information in response to
9 the Fukushima event.

10 Another aspect of the NRC's regulatory program for continuing storage, at reactors and other
11 licensed facilities involves generic communications. Generic communications include, but are
12 not limited to, generic letters, bulletins, information notices, safeguards advisories, and
13 regulatory issue summaries. Generic letters request licensee actions or information to address
14 issues regarding emergent or routine matters of safety, security, safeguards, or environmental
15 significance. Bulletins request licensee actions or information to address significant issues
16 regarding matters of safety, security, safeguards, or environmental significance that have great
17 urgency. Information notices are used to communicate operating or analytical experience to the
18 nuclear industry. The industry is expected to review the information for applicability and
19 consider appropriate actions to avoid similar problems. Regulatory issue summaries are used
20 to communicate and clarify the NRC's technical or policy positions on regulatory matters.

21 For example, Information Notice 2012–20 (NRC 2012b) informed licensees about the potential
22 for chloride-induced stress corrosion cracking of austenitic stainless steel and maintenance of
23 dry cask storage system canisters. Although an immediate safety concern did not exist, the
24 NRC alerted its licensees and certificate holders that the monitoring program needs to address
25 this concern as part of an aging management program so that appropriate actions (e.g.,
26 maintenance) would be taken before there were any impacts.

27 **B.3.3.2 Regulatory Oversight of Spent Fuel Pool Leaks**

28 Spent fuel pool design and operational control requirements contained in NRC regulations make
29 it unlikely that a leak will remain undetected long enough to result in public health and safety or
30 environmental concerns. Long-standing and bedrock design requirements include but are not
31 limited to general design criteria in 10 CFR Part 50, Appendix A that focus on fuel storage and
32 handling and radioactivity control (e.g., General Design Criterion 61). Operational controls
33 include requirements for control of effluents and release of radioactive materials such as dose
34 limits found in 10 CFR 20.1301 and design objectives found in 10 CFR Part 50, Appendix I.

35 There are also requirements that are new or have been recently updated in response to recent
36 operational experience and related studies by NRC task forces. For example, a 2006 report by
37 NRC's Liquid Radioactive Release Lessons Learned Task Force made 26 specific

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1 recommendations for improvements to NRC regulatory programs (NRC 2006). In 2010, the
2 NRC Groundwater Task Force reevaluated the recommendations of the 2006 task force
3 (NRC 2010c). A review of the Groundwater Task Force recommendations by NRC senior
4 management concluded that further action was warranted (NRC 2011c). These studies have
5 influenced specific changes to NRC requirements and guidance. For example:

- 6 • In June 2008, the NRC issued Regulatory Guide 4.21, “Minimization of Contamination and
7 Radioactive Waste Generation: Life-Cycle Planning” (NRC 2008). The purpose of this
8 regulatory guide is to present guidance that will assist applicants covered by 10 CFR
9 20.1406, “Minimization of contamination,” in effectively implementing this licensing
10 requirement.
- 11 • A 2009 revision to Regulatory Guide 4.1 (NRC 2009) provides guidance to licensees for
12 detecting, evaluating, and monitoring releases from operating facilities via unmonitored
13 pathways; to ensure consistency with current industry standards and commercially available
14 radiation detection methodology; to clarify when a licensee’s radiological effluent and
15 environmental monitoring programs should be expanded based on data or environmental
16 conditions; and to ensure that leaks and spills are detected before radionuclides
17 migrate offsite via an unmonitored pathway.
- 18 • On July 17, 2011, the NRC promulgated its Decommissioning Planning Rule, which added
19 10 CFR 20.1406(c) and modified 10 CFR 20.1501(a) and (b) (76 FR 35512). This rule
20 requires all licensees to establish operational practices to minimize site contamination and
21 perform reasonable subsurface radiological surveys, and sets forth new financial assurance
22 requirements.
- 23 • In December 2012, the NRC published Regulatory Guide 4.22, “Decommissioning Planning
24 During Operations,” which provides methods acceptable to the NRC to use in implementing
25 portions of the Decommissioning Planning Rule (NRC 2012c).

26 Appendix E provides additional details on spent fuel pool operations, including monitoring.

27 The draft GEIS provides a detailed description and evaluation of the historical data on spent fuel
28 pool leakage of water and the offsite environmental impacts that may occur during the period of
29 continued storage (Appendix E). In particular, Appendix E determined the impact to public
30 health from spent fuel pool leakage would be SMALL.

31 **B.3.3.3 Dry Cask Storage**

32 While the NRC has established the necessary regulatory framework for continued safe spent
33 fuel management, reactor and ISFSI licensees have acted prudently to safely manage their
34 spent fuel. In the late 1970s and early 1980s, the need for alternative storage began to grow as
35 spent fuel pools at many nuclear reactors began to fill up. Spent fuel pool re-racking, fuel-pin
36 consolidation, and onsite dry cask storage have been successfully employed to increase onsite

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1 storage capacity. In addition, licensees considered dry cask storage as an option to increase
2 spent fuel storage capacity. As discussed above, there are currently 69 licensed ISFSIs. The
3 NRC is successfully regulating six fully decommissioned reactor sites that contain ISFSIs
4 licensed under either the general or specific license provisions of 10 CFR Part 72. Four of the
5 decommissioned reactor sites continue to hold 10 CFR Part 50 licenses and consist only of an
6 ISFSI under the 10 CFR Part 72 general license provisions.⁶ The other two fully
7 decommissioned reactor sites (Trojan and Ft. St. Vrain) have a specific license under 10 CFR
8 Part 72.⁷

9 After the end of the reactor's licensed life for operation, the licensee would continue to store
10 spent fuel onsite under either a possession-only 10 CFR Part 50 or Part 52 license or a 10 CFR
11 Part 72 license. During this time, the licensee would remain under the NRC's regulatory control
12 and NRC inspections and oversight of storage facilities would continue. The NRC monitors the
13 performance of ISFSIs (at both decommissioned and shutdown reactor sites and operating
14 reactor sites) by conducting periodic inspections. When conducting inspections at these ISFSIs,
15 NRC inspectors follow the guidance in NRC Inspection Manual Chapter 2690 (NRC 2012a),
16 "Inspection Program for Dry Storage of Spent Reactor Fuel at Independent Spent Fuel Storage
17 Installations and for 10 CFR Part 71 Transportation Packages."

18 The current regulatory framework for storage of spent fuel allows for multiple license renewals,
19 subject to aging management analysis and planning. In early 2011, the Commission published
20 a final rule that amended 10 CFR Part 72 to increase the initial and renewal terms for specific
21 ISFSI licenses from "not to exceed 20 years" to "not to exceed 40 years" (76 FR 8872). The
22 Commission concluded that, with appropriate aging management and maintenance programs,
23 license terms not to exceed 40 years are reasonable and adequately protect public health and
24 safety. An applicant for a storage license renewal must provide appropriate technical bases for
25 identifying and addressing aging-related effects and develop specific aging management plans
26 to justify extended operations of ISFSIs. The regulatory framework for storage is supported by
27 well-developed regulatory guidance; voluntary domestic and international consensus standards;
28 research and analytical studies; and processes for implementing licensing reviews, inspection
29 programs, and enforcement oversight.

30 **B.3.3.4 Summary of Information on Regulatory Oversight**

31 The NRC will continue its regulatory control and oversight of spent fuel storage at both
32 operating and decommissioned reactor sites through both specific and general 10 CFR Part 72

⁶ These reactor sites include Maine Yankee, Yankee Rowe, Connecticut Yankee (also known as Haddam Neck), and Big Rock Point.

⁷ There are several additional sites with specific Part 72 ISFSI licenses that are in the process of decommissioning (e.g., Humbolt Bay and Rancho Seco). In addition, several shutdown reactors that are not yet decommissioned have ISFSIs under a general license (e.g., La Crosse and San Onofre 1).

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1 licenses. Decades of operating experience and ongoing NRC inspections demonstrate that
2 these reactor and ISFSI licensees continue to meet their obligation to safely store spent fuel in
3 accordance with the requirements of 10 CFR Part 50 and Part 72. If the NRC were to find
4 noncompliance with these requirements or otherwise identify a concern with the safe storage of
5 the spent fuel, the NRC would evaluate the issue and take whatever action or change in its
6 regulatory program is necessary to protect the public health and safety and the environment.

7 As noted in the preceding paragraphs, licensees have continued to develop and successfully
8 use onsite spent fuel-storage capacity in the form of spent fuel pool and dry cask storage in a
9 safe and environmentally sound fashion. Based on the preceding discussion, the NRC believes
10 that for the storage timeframes considered in the draft GEIS, regulatory oversight will continue
11 in a manner consistent with NRC's regulatory actions and oversight in place today to provide for
12 continued storage of spent fuel in a safe manner until sufficient repository capacity is available
13 for the safe disposal of all spent fuel.

14 **B.3.4 Summary of Technical Feasibility of Continued Storage**

15 Storage of spent fuel will be necessary until a repository is available for permanent disposal. It
16 is reasonable to assume that the storage of spent fuel in any combination of storage in spent
17 fuel pools or dry casks will continue as a licensed activity under regulatory controls and
18 oversight. Licensees have continued to develop and successfully use onsite spent nuclear fuel
19 storage capacity in the form of spent fuel pool and dry cask storage in a safe and
20 environmentally sound fashion. As discussed above, technical understanding and operational
21 experience continues to support the technical feasibility of safe storage of spent fuel in spent
22 fuel pools and in dry casks over long periods of time (e.g., slow degradation of spent fuel during
23 storage in spent fuel pools and dry casks; engineered features of storage pools and dry casks to
24 safely withstand accidents caused by either natural or man-made phenomena). In addition,
25 regulatory oversight has been shown to enhance safety designs and operations as concerns
26 and information evolve over time (e.g., safety enhancements made after the September 11,
27 2001 terrorist attacks and the March 11, 2011 Fukushima Dai-ichi disaster and actions to
28 address spent fuel pool leaks as discussed in Appendix E of this draft GEIS).

29 Based on the technical information and the national and international experience with wet and
30 dry storage of spent fuel, the NRC concludes it is technically feasible to safely store spent fuel in
31 either wet or dry storage for the short-term storage timeframe with only routine maintenance
32 (i.e., no large-scale replacement of spent fuel pools or dry cask storage systems).

33 In the draft GEIS, the NRC assumes that after the short-term storage timeframe, spent nuclear
34 fuel is stored in dry casks. If necessary, there is no technical reason that spent fuel cannot be
35 safely stored in dry casks beyond the short-term storage timeframe. As discussed in this
36 appendix, the degradation rates of spent fuel are low under dry storage conditions and the
37 probability of accidents with large consequences are very low. Storage of spent fuel beyond the

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1 short-term storage timeframe would continue under an approved aging management program to
2 ensure that monitoring and maintenance are adequately performed. Repackaging of spent fuel
3 may be needed if storage continues beyond the short-term storage timeframe. In the draft
4 GEIS, the NRC conservatively assumes that the dry casks would need to be replaced if storage
5 continues beyond the short-term storage timeframe. The NRC assumes replacement of dry
6 casks after 100 years of service life, even though studies and experience to date do not
7 preclude a longer service life. Accidents associated with repackaging spent fuel are evaluated
8 in Section 4.18 and the environmental impacts are SMALL because the accident consequences
9 would not exceed the NRC accident dose standard contained in 10 CFR 72.106. The NRC
10 concludes it is technically feasible to continue to store spent fuel beyond the short-term storage
11 timeframe, which may include activities to repackage spent fuel. The NRC continues to
12 evaluate aging management programs and monitor dry cask storage and will update its service
13 life assumptions as necessary and consider any circumstances that might require repackaging
14 of spent fuel earlier than anticipated.

15 Section 4.19 of the draft GEIS describes the environmental impacts of potential acts of
16 sabotage or terrorism involving the continued storage of spent fuel. This section acknowledges
17 that as the immediate hazard posed by the high radiation levels of spent fuel diminishes over
18 time so does the deterrent to handling by unauthorized persons. The BRC report noted that
19 “over long time periods (perhaps a century or more, depending on burnup and the level of
20 radiation that is deemed to provide adequate self-protection), the fuel could become more
21 susceptible to possible theft or diversion (although other safeguards would remain in place).
22 This in turn could change the security requirements for older spent fuel. Extending storage to
23 timeframes of more than a century could thus require increasingly demanding and expensive
24 security protections at storage sites.” Therefore, additional security requirements may be
25 necessary in the future, should spent nuclear fuel remain in storage for a substantial period of
26 time. If necessary, the NRC will issue orders or enhance its regulatory requirements for ISFSI
27 security, as appropriate, to provide adequate protection of public health and safety and the
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Outreach and Correspondence

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Outreach and Correspondence

1 This appendix provides a description of outreach activities and agencies and groups that the
2 U.S. Nuclear Regulatory Commission (NRC) contacted during the preparation of this draft
3 *Waste Confidence Generic Environmental Impact Statement* (draft GEIS), and a listing of
4 correspondence related to the NRC's environmental review. The NRC did not identify any
5 cooperating agencies for the Waste Confidence environmental review or receive any formal
6 requests for cooperating agency status.

7 **C.1 Outreach**

8 The NRC staff has conducted extensive outreach efforts during the preparation of this draft
9 GEIS.

10 **WCOUTREACH E-mail:** The NRC staff uses an e-mail account, WCOutreach@nrc.gov, to
11 distribute information to subscribers regarding Waste Confidence. Through this e-mail account,
12 the NRC staff provides periodic updates on activities, links to new information published in the
13 NRC's Agencywide Document Access and Management Systems (ADAMS), and links to
14 information on the NRC website. On October 25, 2012, when the NRC staff e-mailed the
15 scoping notice to subscribers, the NRC's WCOutreach@nrc.gov e-mail distribution list consisted
16 of approximately 1,050 individuals, including individuals who expressed interest in previous
17 spent nuclear fuel (spent fuel) studies and efforts; members of the public on mailing lists for new
18 reactor and license renewal environmental reviews; representatives from Federal, Tribal, State,
19 and local governments; and representatives from industry and public advocacy groups and
20 environmental organizations. In the months following publication of the draft GEIS scoping
21 notice, the e-mail distribution list has grown to approximately 3,200 subscribers.

22 **Public Meetings and Webinars:** During the 70-day scoping comment period, the NRC
23 conducted two webcast public scoping meetings and two webinars. The meetings and webinars
24 each began with a slide presentation by NRC staff, which was followed by a question-and-
25 answer period and a block of time dedicated to listening to and transcribing public scoping
26 comments. Notices for the public meetings were e-mailed, posted on the NRC website, and
27 advertised by the NRC's Office of Public Affairs.

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1 **NRC Website:** The NRC maintains a Waste Confidence Directorate webpage at
2 www.nrc.gov/waste/spent-fuel-storage/wcd.html. The NRC regularly updates the website,
3 which contains a specific section titled “Public Involvement in Waste Confidence,” with related
4 documents, new information, and frequently asked questions.

5 **Monthly Status Update Public Teleconferences:** In the months following closure of the
6 scoping period and leading up to publication of the draft GEIS, the NRC staff held monthly
7 public status teleconferences to provide an update on activities related to the Waste Confidence
8 rulemaking and draft GEIS. These were Category 3 meetings where the public was invited to
9 attend via telephone and ask questions of the NRC staff. Transcripts and summaries of the
10 teleconferences are posted to the Waste Confidence Directorate “Public Involvement in Waste
11 Confidence” webpage.

12 **Tribal Contact:** With assistance from the NRC’s Office of Federal and State Materials and
13 Environmental Management Programs, the scoping notice was mailed and e-mailed, when
14 possible, to all Federally recognized Native American Tribes (1) located within 50 mi of a
15 nuclear power plant, (2) registered with the NRC for advance notification of shipments of
16 irradiated reactor fuel and nuclear waste under Title 10 of the *Code of Federal Regulations*
17 (CFR) Parts 71 and 73; or (3) previously expressing interest in the NRC’s Yucca Mountain
18 application activities (see ADAMS Accession No. ML12311A464 for an example of the tribal
19 outreach letter that transmitted the scoping notice and the tribal distribution list). Approximately
20 100 Tribes were mailed a copy of the Waste Confidence scoping notice. In addition, the NRC
21 corresponded with the Northern Chumash Tribal Council (recognized by the state of California)
22 and the Santa Ynez Band of Chumash Indians (Federally recognized), which are both located
23 near the Diablo Canyon Nuclear Plant.

24 The NRC also initiated government-to-government consultation with the Prairie Island Indian
25 Community. The Prairie Island Indian reservation is located adjacent to the Prairie Island
26 Nuclear Generating Plant in Welch, Minnesota. A government-to-government meeting was held
27 between the NRC and Tribal representatives on June 13, 2013, on the Prairie Island
28 Reservation. The NRC continues government-to-governmental consultation with the Prairie
29 Island Indian Community Tribal Council as the Waste Confidence review proceeds.

30 **State Contact:** NRC’s Office of Federal and State Materials and Environmental Management
31 Programs provided the scoping notice to state liaison officers in all agreement and
32 nonagreement states and provided monthly notification of the public status teleconferences.

33 **U.S. Environmental Protection Agency (EPA) Contact:** The NRC met with representatives of
34 the EPA on November 5, 2012. The purpose of the meeting was to provide historical
35 information on the Waste Confidence rule, to discuss the status of the Waste Confidence
36 environmental review and rulemaking, to discuss how the NRC was conducting new reactor and
37 license renewal reviews in the interim while Waste Confidence was addressed, and to receive

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1 advice on the NRC's approach. The EPA provided comments on the scope of the Waste
2 Confidence GEIS (Accession No. ML13028A469) and the NRC continues to consult with the
3 EPA as the Waste Confidence review proceeds.

4 **C.2 Correspondence**

5 This section contains a chronological listing of correspondence related to the NRC's
6 environmental review in preparation of this draft GEIS. The documents listed below can be
7 found online through ADAMS at <http://www.nrc.gov/reading-rm/adams.html>. The ADAMS
8 accession numbers for each document are included below.

9	October 24, 2012	NRC to Hold Public Scoping Meetings for Waste Confidence
10		Environmental Study Nov. 14 in Rockville, MD. Press Release
11		No. 12-119. Accession No. ML12298A295.
12	October 25, 2012	<i>Federal Register</i> Notice of Intent to Prepare an Environmental Impact
13		Statement and Notice of Public Meetings. 77 FR 65137. Accession
14		No. ML12312A178.
15	October 25, 2012	E-mail from WCOutreach@nrc.gov , <i>Federal Register</i> notice
16		(77 FRN 65137) for Waste Confidence EIS and Scoping. Accession
17		No. ML13120A477.
18	October 31, 2012	Forthcoming Waste Confidence Scoping Meetings for the Environmental
19		Impact Statement (November 14, 2012). Accession No. ML12306A224.
20	October 31, 2012	Notification of the Scoping Process for the Environmental Impact
21		Statement for the Waste Confidence Decision and Rule Update and
22		Notice of Public Meetings and Webinars (FSME-12-085). Accession
23		No. ML12293A107.
24	November 6, 2012	E-mail from WCOutreach@nrc.gov , Link to Meeting Notice for Nov. 14
25		Waste Confidence Scoping Meetings. Accession No. ML13120A483.
26	November 8, 2012	E-mail from WCOutreach@nrc.gov , <i>Federal Register</i> notice
27		(77 FRN 65137) for Waste Confidence EIS and Scoping - - and Nov. 14
28		Public Meeting Notice. Accession No. ML13120A481.
29	November 8, 2012	Letter to NRC Commissioners, from G. Fettus, M. Goldstein, and
30		D. Curran, Notice of Intent to Prepare Waste Confidence EIS.
31		Accession No. ML12314A345.

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1	November 13, 2012	Letter to NRC Commissioners, from D. Brancato, Riverkeeper, Waste
2		Confidence Scoping Meetings and Opportunity to Comment. Accession
3		No. ML13184A154.
4	November 13, 2012	E-mail from WCO Outreach@nrc.gov , Direct Comment Link and Waste
5		Confidence Scoping Meeting Slides. Accession No. ML13120A478.
6	November 21, 2012	Forthcoming Webinars for the Environmental Impact Statement to
7		Support an Updated Waste Confidence Decision and Rule (December 5
8		and 6, 2012). Accession No. ML12326A911.
9	November 27, 2012	E-mail from WCO Outreach@nrc.gov , Upcoming December 5 and 6 Waste
10		Confidence Webinars. Accession No. ML13120A479.
11	November 28, 2012	Letter to NRC Commissioners, from F. Collins, Tribal Administrator,
12		Northern Chumash Tribal Council, Notice of Intent to Prepare Waste
13		Confidence EIS. Accession No. ML13184A149.
14	December 5, 2012	Letter to G. Fettus, M. Goldstein, and D. Curran, Harmon, Curran,
15		Spielberg & Eisenberg, L.L.P., from A. Macfarlane, Chairman, NRC,
16		regarding the Waste Confidence Scoping Process. Accession No.
17		ML12319A309. (Identical letters sent to G. Fettus and M. Goldstein.)
18	December 6, 2012	Summary of Public Scoping Meetings for Environmental Impact
19		Statement to Support Waste Confidence Rulemaking (November 14,
20		2012). Accession No. ML12339A281.
21	December 26, 2012	Summary of Public Scoping Webinars for the Environmental Impact
22		Statement to Support the Waste Confidence Rulemaking (December 5
23		and 6, 2012). Accession No. ML12356A293.
24	December 31, 2012	E-mail from WCO Outreach@nrc.gov , Waste Confidence Scoping Meeting
25		Summaries and Transcripts. Accession No. ML13120A480.
26	December 31, 2012	Notice of Forthcoming Public Teleconference to Discuss Status of Waste
27		Confidence Environmental Impact Statement and Rulemaking
28		(January 16, 2013). Accession No. ML12366A201.
29	January 2, 2013	Letter to F. Collins, Tribal Administrator, Northern Chumash Tribal
30		Council, from K. McConnell, Director, Waste Confidence Directorate,
31		NRC, regarding the Waste Confidence Scoping Process. Accession
32		No. ML13002A221.

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1	January 6, 2013	Letter to NRC Commissioners, from S. Cohen, Government and Legal Specialist, Santa Ynez Band of Chumash Indians, Notice of Intent to Prepare Waste Confidence EIS. Accession No. ML130500419.
2		
3		
4	January 9, 2013	E-mail from WCO Outreach@nrc.gov, Waste Confidence Monthly Public Teleconferences. Accession No. ML13120A484.
5		
6	January 11, 2013	Letter to S. Cohen, Government and Legal Specialist, Santa Ynez Band of Chumash Indians, from K. McConnell, Director, Waste Confidence Directorate, NRC, regarding the Waste Confidence Scoping Process. Accession No. ML13011A015.
7		
8		
9		
10	January 11, 2013	Notice of Forthcoming Public Teleconference to Discuss Status of Waste Confidence Environmental Impact Statement and Rulemaking (FSME-13-003). Accession No. ML13011A150.
11		
12		
13	January 31, 2013	Summary of Public Teleconference to Discuss Status of Waste Confidence Environmental Impact Statement and Rulemaking (January 16, 2013). Accession No. ML13032A100.
14		
15		
16	January 31, 2013	Notice of Forthcoming Public Teleconference to Discuss Status of Waste Confidence Environmental Impact Statement and Rulemaking (February 20, 2013). Accession No. ML13031A063.
17		
18		
19	February 5, 2013	Notice of Forthcoming Public Teleconference to Discuss Status of Waste Confidence Environmental Impact Statement and Rulemaking (FSME-13-016). Accession No. ML13032A152.
20		
21		
22	February 5, 2013	E-mail from WCO Outreach@nrc.gov, Waste Confidence teleconference meeting summary, transcript and upcoming meeting. Accession No. ML13120A475.
23		
24		
25	March 1, 2013	Summary of Public Teleconference to Discuss Status of Waste Confidence Environmental Impact Statement and Rulemaking (February 20, 2013). Accession No. ML13060A105.
26		
27		
28	March 4, 2013	Summary Report for the Waste Confidence Generic Environmental Impact Statement Scoping Process. Accession No. ML13060A136.
29		
30	March 5, 2013	E-mail from WCO Outreach@nrc.gov, Waste Confidence scoping summary report and upcoming teleconference information. Accession No. ML13120A476.
31		
32		

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1	March 5, 2013	Notice of Forthcoming Public Teleconference to Discuss Status of Waste
2		Confidence Generic Environmental Impact Statement and Rulemaking
3		(March 20, 2013). Accession No. ML13063A465.
4	March 8, 2013	Letter to K. McConnell and A. Imboden, Waste Confidence Directorate,
5		NRC, from D. Brancato, Riverkeeper, NRC Waste Confidence Update –
6		Request for Public Meeting. Accession No.
7		ML13107B448 ML13102A054.
8	March 8, 2013	Notice of Forthcoming Public Teleconference to Discuss Status of Waste
9		Confidence Environmental Impact Statement and Rulemaking
10		(FSME–13–024). Accession No. ML13063A491.
11	March 28, 2013	Notice of Forthcoming Public Teleconference to Discuss Status of Waste
12		Confidence Generic Environmental Impact Statement and Rulemaking
13		(April 17, 2013). Accession No. ML13087A363.
14	April 5, 2013	Summary of Public Teleconference to Discuss Status of Waste
15		Confidence Environmental Impact Statement and Rulemaking
16		(March 20, 2013). Accession No. ML13095A362.
17	April 5, 2013	Notice of Forthcoming Public Teleconference to Discuss Status of Waste
18		Confidence Environmental Impact Statement and Rulemaking
19		(FSME-13–034). Accession No. ML13091A344.
20	April 11, 2013	E-mail from WCO Outreach@nrc.gov, Upcoming April public
21		teleconference and March meeting summary and transcript.
22		Accession No. ML13120A482.
23	May 2, 2013	Summary of Public Teleconference to Discuss Status of Waste
24		Confidence Environmental Impact Statement and Rulemaking (April 17,
25		2013). Accession No. ML13122A097.
26	May 6, 2013	Notice of Forthcoming Public Teleconference to Discuss Status of Waste
27		Confidence Generic Environmental Impact Statement and Rulemaking
28		(May 29, 2013). Accession No. ML13127A380.
29	May 8, 2013	E-mail from WCO Outreach@nrc.gov, Waste Confidence April 17 meeting
30		summary and transcript, and May 29 meeting notice. Accession
31		No. ML13128A508.

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Appendix C

1	May 14, 2013	Notice of Forthcoming Public Teleconference to Discuss Status of Waste
2		Confidence Generic Environmental Impact Statement and Rulemaking
3		(FSME-13-044). Accession No. ML13133A072.
4	May 14, 2013	Letter to D. Brancato, Riverkeeper, from K. McConnell, NRC, regarding
5		NRC Waste Confidence Update – Request for Public Meeting.
6		Accession No. ML13126A214.
7	May 23, 2013	Letter to NRC Commissioners, from K. Landis-Marinello, Assistant
8		Attorney General, State of Vermont, States' Petition for Review of NRC
9		Staff Scoping Decision, Spent Fuel Storage EIS (RIN 3150-AJ20;
10		NRC-2012-0246). Accession No. ML13149A446.
11	May 24, 2013	Letter to A. Vietti-Cook, Secretary of the Commission, NRC, from
12		K. Landis-Marinello, Assistant Attorney General, State of Vermont,
13		Distributing States' Petition for Review of NRC Staff Scoping Decision;
14		Spent Fuel Storage EIS (RIN 3150-AJ20; NRC-2012-0246). Accession
15		No. ML13149A446.
16	May 30, 2013	Notice of Forthcoming Public Teleconference to Discuss Status of Waste
17		Confidence Generic Environmental Impact Statement and Rulemaking
18		(June 19, 2013). Accession No. ML13150A263.
19	June 4, 2013	Notice of Forthcoming Public Teleconference to Discuss Status of Waste
20		Confidence Generic Environmental Impact Statement and Rulemaking
21		(FSME-13-053). Accession No. ML13154A434.
22	June 6, 2013	Summary of Public Teleconference to Discuss Status of Waste
23		Confidence Generic Environmental Impact Statement and Rulemaking
24		(May 29, 2013). Accession No. ML13158A024.
25	June 13, 2013	E-mail from WCO Outreach@nrc.gov , Waste Confidence June 19 th status
26		teleconferencing notice, and May 29 th meeting summary and transcript.
27		Accession No. ML13171A353.
28	June 24, 2013	E-mail from WCO Outreach@nrc.gov , Waste Confidence Commission
29		review draft documents now available. Accession No. ML13175A390.
30	July 17, 2013	E-mail from WCO Outreach@nrc.gov , Waste Confidence June 19 th Status
31		Teleconference Meeting Summary and Transcript. Accession
32		No. ML13219A201.

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1	July 23, 2013	Notice of Forthcoming Public Teleconference to Discuss Status of Waste
2		Confidence Generic Environmental Impact Statement and Rulemaking
3		(August 14, 2013). Accession No. ML13205A393.
4	July 23, 2013	Letter to W. Sorrell, Attorney General, State of Vermont, from Allison M.
5		Macfarlane, Chairman, NRC, regarding the Petition for Review of Staff
6		Scoping Decision. Accession No. ML13204A315. (Identical letters sent
7		to D. Springer, G. Jepsen, M. Coakley, and E. Schneiderman.)
8	July 31, 2013	Notice of Forthcoming Public Teleconference to Discuss Status of Waste
9		Confidence Generic Environmental Impact Statement and Rulemaking
10		(FSME-13-075). Accession No. ML13211A429.
11	August 5, 2013	E-mail from WCO Outreach@nrc.gov , Commission Approves Publication of
12		Proposed Waste Confidence Rule and Draft Generic EIS. Accession
13		No. ML13219A211.

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Appendix D

Draft GEIS Comments and Responses

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Appendix D

Draft GEIS Comments and Responses

- 1 This appendix is intentionally left blank. This appendix will summarize the comments and
2 responses received on the draft Generic Environmental Impact Statement (GEIS) and proposed
3 rule.
- 4 Comments and responses on the draft GEIS and proposed rule will be contained in a separate
5 document that will be issued with and referenced in the final GEIS and *Federal Register* notice
6 for the final rule.

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Appendix E

Analysis of Spent Fuel Pool Leaks

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Appendix E

Analysis of Spent Fuel Pool Leaks

1 This appendix describes the environmental impacts of spent fuel pool leaks that may occur
2 during the short-term storage timeframe (defined in Chapter 1 as the first 60 years after the end
3 of a reactor's licensed life for operation).¹ For the analysis presented in this appendix, the
4 U.S. Nuclear Regulatory Commission (NRC) assumes that spent nuclear fuel (spent fuel) is
5 removed from the pool within 60 years of the end of the reactor's licensed life for operation.
6 Once removed from the spent fuel pool, the spent fuel will be transferred to dry casks for
7 storage in an independent spent fuel storage installation or shipment to a repository.

8 As described in Section E.2, this appendix evaluates the potential offsite (i.e., outside the
9 owner-controlled area) environmental impacts of spent fuel pool leaks. The environmental
10 consequences of accidents, (e.g., cask drops) and natural events (e.g., earthquakes) that
11 damage the spent fuel pool structure and result in a catastrophic loss of water volume in the
12 spent fuel pool are discussed in Section 4.18.

13 Section E.1 provides a historical overview of information pertaining to spent fuel pool leaks,
14 including information on spent fuel pool designs, operation, and the history of spent fuel pool
15 leaks at commercial nuclear power plants. Section E.2 describes the potential offsite
16 environmental impacts of spent fuel pool leaks to groundwater, surface water, soils, and public
17 health. Section E.3 presents historical data on spent fuel pool leaks.

18 **E.1 Background**

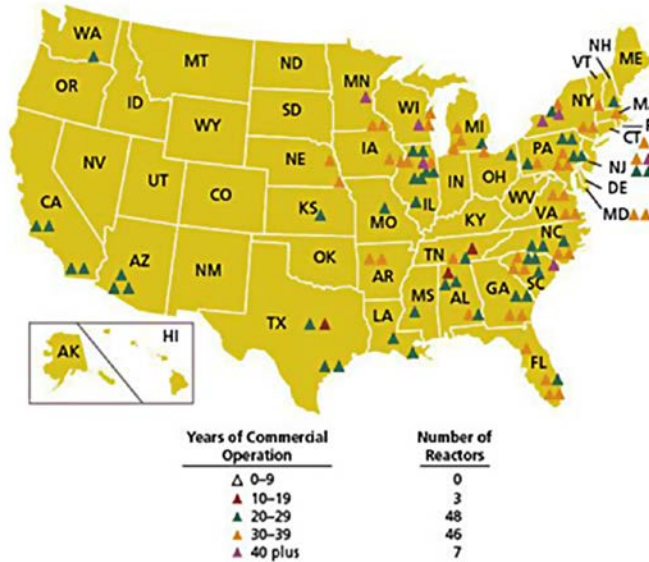
19 As of March 2013, there are 104 commercial nuclear reactors licensed to operate in the
20 United States. These reactors are located at 65 sites in 31 states (Figure E-1). Of these
21 104 reactors, 69 are pressurized water reactors and 35 are boiling water reactors. Because
22 some of these reactors share spent fuel pools, there are 59 pressurized water reactor and
23 35 boiling water reactor spent fuel pools.

¹ Historically, the NRC has devoted considerable attention to the topic of this appendix, reflected in the detailed analyses and studies discussed in the appendix. In light of the historic interest of the public in this issue, as evidenced by comments in NRC's Waste Confidence rulemaking, as well as related litigation, this appendix provides a more detailed discussion of referenced materials and studies that underlie the analysis of spent fuel pool leaks in the body of this draft generic environmental impact statement (draft GEIS).

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**U.S. Commercial Nuclear Power Reactors—
Years of Operation by the End of 2010**

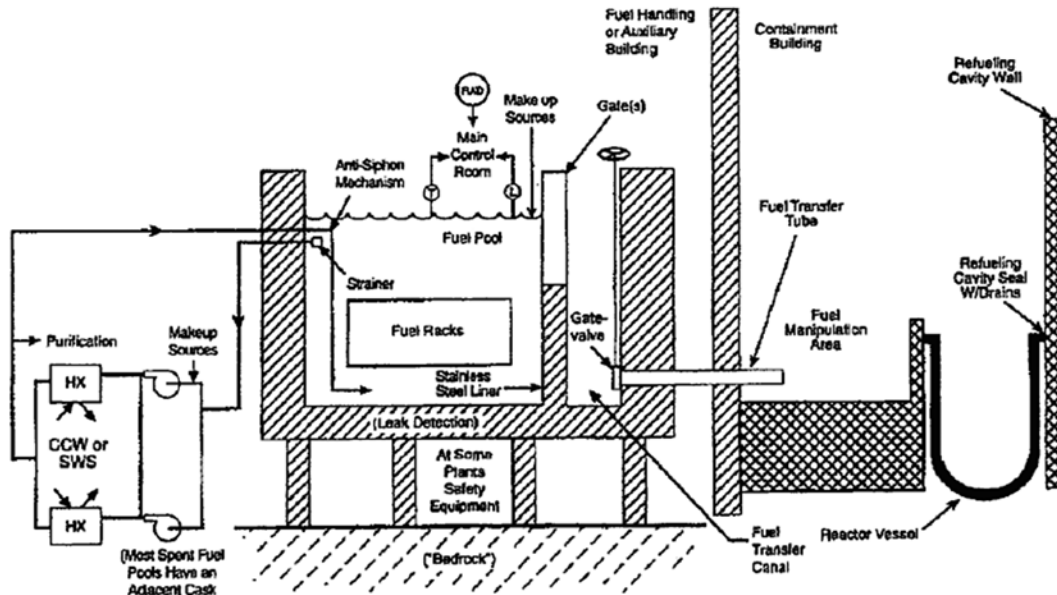


1
2 **Figure E-1.** Locations of U.S. Nuclear Power Plants. Symbols indicate the years of operation
3 as of the end of 2010 (NRC 2012a).

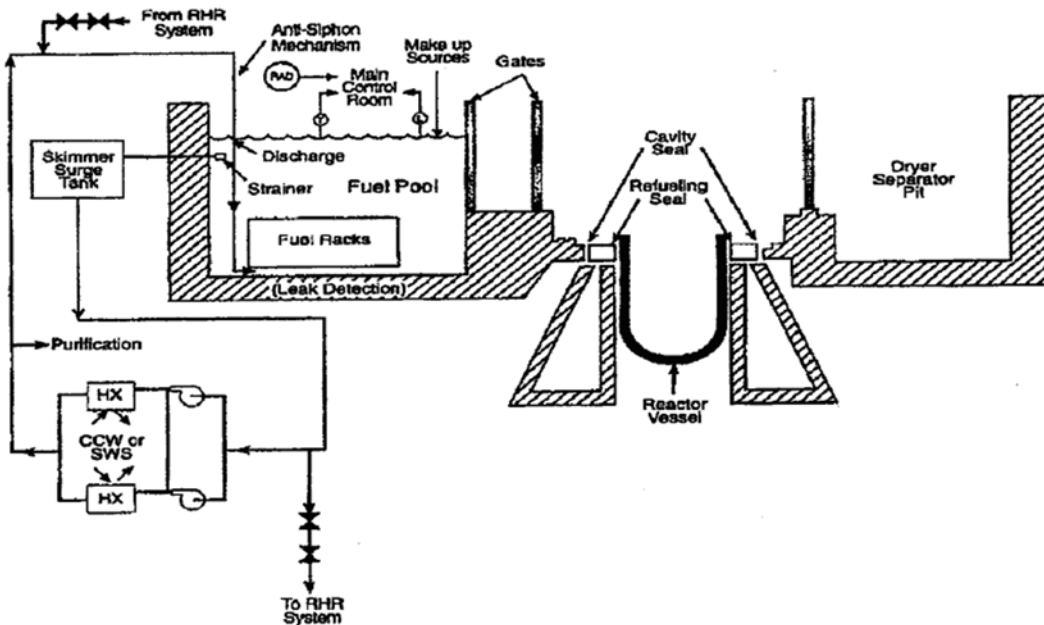
4 **E.1.1 Spent Fuel Pools**

5 Figure E-2 shows diagrams of generic pressurized water reactor and boiling water reactor spent
6 fuel pools. In general, spent fuel pools for boiling water reactor plants are elevated structures
7 within the containment building and are filled with demineralized water. Spent fuel pools at
8 pressurized water reactors are generally located in an auxiliary building adjacent to the reactor
9 building and contain borated water (e.g., 2,200 to 2,400 ppm boron, pH ~4.8). A typical spent
10 fuel pool for a pressurized water reactor is about 12 m [40 ft] deep and 12 m [40 ft] or more in
11 each horizontal direction (Copinger et al. 2012). Water is maintained at a minimum depth of at
12 least 6 m [20 ft] above the spent fuel bundles to ensure sufficient shielding of the spent fuel
13 bundles. Water levels are maintained by periodically adding water to the pool to compensate
14 for evaporation. Typically, the reinforced concrete walls are between 0.7 and 3 m [2 and 10 ft]
15 thick and the inside surfaces are lined by welded stainless-steel plates to form a leak-tight
16 barrier. These plates are generally about 6 to 13 mm [0.25 to 0.5 in.] thick and joined by full-
17 penetration seam welds. The liner plates may also be plug welded between the seams to studs
18 embedded in the concrete. In addition, all licensees actively monitor spent fuel pools for
19 leakage, either directly through leak-detection systems or through various procedural controls.
20 Leak-detection systems typically consist of several channels installed over the seams formed
21 when spent fuel pool liner plates are welded together. These channels often can be monitored
22 individually and are designed so leaked water empties into drains where it can be monitored
23 and returned to either sumps or other cleanup or collection systems (NRC 1997a).

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(a)



(b)

1
2

3
4

5 **Figure E-2.** Generic Layouts of Spent Fuel Pools and Transfer Systems for (a) Pressurized
6 Water Reactors and (b) Boiling Water Reactors (NRC 1997a)

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1 In addition, spent fuel pools are serviced by spent fuel pool cooling and purification systems.
2 These systems provide cooling to the spent fuel in the pool, provide makeup water to the pool,
3 maintain water chemistry, and remove fission products from the spent fuel pool water.

4 There is also one standalone spent fuel pool facility in the United States, the GE-Hitachi Nuclear
5 Energy Americas, LLC, Morris wet storage facility (GEH Morris) in Morris, Illinois (DOE 2003).
6 Though GEH Morris was originally designed as a commercial reprocessing facility, only the
7 storage facility was completed and remains in operation. GEH Morris currently holds
8 3217 spent fuel assemblies from commercial nuclear power plants. These spent fuel
9 assemblies are stored in two pools. As with spent fuel pools at nuclear power plants, the GEH
10 Morris spent fuel pools are stainless-steel-lined reinforced concrete structures with leak-
11 detection systems (GE 2004).

12 Spent Fuel Pool Maintenance

13 Even though the reactor is no longer operating during the short-term storage timeframe, a
14 licensee is still bound by the terms and conditions of its operating license until the license is
15 terminated. As a result, the NRC assumes that spent fuel pool maintenance requirements that
16 are in place during the operating period of the reactor will remain in place during the short-term
17 timeframe, and will stay in place even if the license is modified during the short-term timeframe.

18 The safety of spent fuel storage is established for each facility through a safety analysis report
19 prepared by the licensee to support its application for an operating license and reviewed by the
20 NRC. Each safety analysis report includes a number of operational conditions and limitations
21 important to safe spent fuel storage. These conditions and limitations are subject to regulations
22 that restrict the changes that can be implemented without prior NRC approval. Among these
23 regulations are requirements to implement managerial and administrative controls to ensure
24 safe operation through implementation of the facility's quality assurance program (Title 10 of the
25 *Code of Federal Regulations* [CFR] 50.54(a)) and requirements for licensees to obtain a license
26 amendment prior to implementing changes to the facility or facility procedures that do not meet
27 certain criteria (10 CFR 50.59). In addition to these regulations, administrative technical
28 specifications for nuclear power plants typically include a requirement to establish, implement,
29 and maintain a broad range of procedures for safe operation of the facility. The design basis of
30 the various facility structures, systems, and components and the licensee's NRC-approved
31 quality assurance program, change control processes, and plant procedures ensure that the
32 facility structures, systems, and components will operate and be maintained within established
33 safety parameters to accomplish their functions during normal operating as well as accident
34 conditions.

35 Licensees are required to monitor the performance and condition of structures, systems, and
36 components important to safety (10 CFR 50.65). Monitoring the structures, systems, and
37 components provides reasonable assurance that the structures, systems, and components are

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1 capable of fulfilling their intended functions. Often referred to as the “Maintenance Rule,”
2 10 CFR 50.65 further requires the licensee to take appropriate corrective action when the
3 performance or condition of a structure, system, or component important to safety does not
4 conform to established performance criteria. The main objective of the Maintenance Rule is to
5 monitor the overall continuing effectiveness of maintenance programs used by the licensees to
6 ensure that safety-related (and certain nonsafety-related) structures, systems, and components
7 are capable of performing their intended functions. All nuclear power plants have specific aging
8 management programs to inspect, monitor, detect, and trend the aging of spent fuel structure
9 concrete, liner plate and structural steel that support different commodities. The aging
10 management program also include an acceptance criteria that can be used to evaluate the
11 inspection results and determine if the spent fuel pool structure can perform its intended
12 function or if corrective action is needed. The inspections are performed periodically at a
13 frequency of 5 to 10 years.

14 For nuclear power plants that have undergone license renewal, the existing aging management
15 program for the spent fuel pool concrete structure and liner plate is enhanced to monitor
16 leakage from the spent fuel pool. The enhancement requires monitoring to ensure that leak
17 chase channels embedded in the concrete as a part of the liner plate are open, unclogged, and
18 allow free flow of water from the spent fuel pool liner plate. This leaked water is then collected,
19 analyzed, treated, and disposed of properly. This approach ensures that the water from the
20 spent fuel pool does not leak to the environment through cracks in the concrete. These
21 inspections and monitoring activities help ensure that issues associated with aging of spent fuel
22 pools will be identified and addressed in a timely manner, decreasing the likelihood that a spent
23 fuel pool would develop a long-term, undetected leak due to aging-related degradation
24 mechanisms.

25 **E.1.2 Groundwater Monitoring and Licensee Response to Leaks at Nuclear** 26 **Power Plants**

27 This section describes the NRC’s requirements for groundwater monitoring and the nuclear
28 industry’s implementation of groundwater monitoring at nuclear power plant sites.

29 On June 17, 2011, the NRC issued its Decommissioning Planning Rule (76 FR 35512). The
30 purpose of this rule, which amended regulations at 10 CFR Parts 20, 30, 40, 50, 70, and 72, is
31 to “improve decommissioning planning and thereby reduce the likelihood that facilities under its
32 jurisdiction will become legacy sites” (76 FR 35512). A legacy site is one with complex issues
33 that is in a decommissioning status and whose owner cannot complete the decommissioning
34 work for technical or financial reasons (76 FR 35512). The Decommissioning Planning Rule,
35 through amended regulations at 10 CFR 20.1406 and 20.1501, requires licensees of operating
36 facilities to “minimize the introduction of significant residual radioactivity into the site, including
37 the subsurface, and to perform radiological surveys to identify the extent of significant residual
38 radioactivity at their sites, including the subsurface” (NRC 2012b). For nuclear power plants

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1 licensed before August 20, 1997, which includes all currently operating reactors, the NRC has
2 found that, in general, groundwater monitoring conducted in accordance with the Groundwater
3 Protection Initiative developed by the Nuclear Energy Institute, a nuclear industry consortium, is
4 adequate to comply with these regulations (NRC 2012b). However, licensees may choose to
5 develop groundwater-monitoring programs with additional elements than those recommended
6 by the Groundwater Protection Initiative. For nuclear power plants licensed after August 20,
7 1997, licensees are subject to the additional requirements of 10 CFR 20.1406(a)-(b), of which
8 “monitoring and routine surveillance programs are an important part of minimizing potential
9 contamination” (NRC 2008).

10 The Nuclear Energy Institute developed its Groundwater Protection Initiative in 2006 in
11 response to leaks containing radioactive material at several plants. The Initiative is described in
12 NEI 07-07, “Industry Ground Water Protection Initiative - Final Guidance Document” (NEI
13 2007). All power reactor licensees have committed to follow the initiative, which identifies
14 actions to improve licensee response to inadvertent releases, including releases from spent fuel
15 pools that may result in low, but detectable, levels of plant-related radioactive materials in
16 subsurface soils and water. The Initiative identifies the actions licensees are expected to take,
17 including the development of written groundwater protection programs, improved stakeholder
18 communications, and program oversight. An important objective of the initiative is to detect
19 leaks well before radionuclide concentrations approach regulatory limits for radioactive releases.
20 The Initiative also addresses detection and remediation of leaks. The Electric Power Research
21 Institute, another industry organization, has published guidance to licensees on the design and
22 implementation of a groundwater-monitoring program (EPRI 2008).

23 As part of these efforts, the nuclear power industry has committed to improving communication
24 with external stakeholders, including members of the public as well as local, State, and Federal
25 government officials. This includes: (i) periodic briefings on their site-specific groundwater
26 protection programs; (ii) prompt notice to the cognizable authorities whenever significant onsite
27 spills or leaks into groundwater occur or onsite or offsite monitoring results exceed monitoring
28 standards; (iii) a written 30-day report to the NRC for any monitoring result for onsite
29 groundwater that is, or may be used as, a source of drinking water that exceeds monitoring
30 criteria; and (iv) an annual radiological environmental operating report or the annual radioactive
31 effluent release report that documents onsite groundwater sample results and a description of
32 any significant onsite leaks or spills into groundwater (NEI 2007).

33 Licensees might perform additional site-specific monitoring and reporting, based on State or
34 local requirements, or agreements between the licensee and other interested parties. For
35 example, as part of its settlement of spent fuel pool issues raised by parties to the Indian Point
36 Units 2 and 3 relicensing proceeding, the licensee committed to publish the results of
37 groundwater monitoring at Indian Point on a quarterly basis to a publicly available website, and
38 to conduct additional fish sampling in accordance with its monitoring plan (Entergy 2012).

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1 In April 2011, the NRC evaluated industry performance in “Summary of Results from
2 Completion of NRC’s Temporary Instruction on Groundwater Protection, TI–2515/173 Industry
3 Groundwater Protection Initiative” (NRC 2011b). This report was based on inspections
4 conducted between August 2008 and August 2010 at all nuclear power plant sites. The report
5 found that groundwater-monitoring programs had been implemented at virtually all nuclear
6 power plant sites, and that licensees achieved an aggregate 95 percent completion of the
7 NEI 07–07 Hydrology and Geology, and Site Assessment objectives. For the onsite
8 groundwater monitoring objective, the completion rate was 92 percent (NRC 2011b). The NRC
9 continues to monitor the implementation and maintenance of licensees’ groundwater monitoring
10 programs through the reactor oversight process.

11 Licensee responses to leaks are dictated by the requirements of various NRC regulations. In
12 Regulatory Guide (RG) 1.21, “Measuring, Evaluating, and Reporting Radioactive Material in
13 Liquid and Gaseous Effluents and Solid Waste,” the NRC provides guidance to licensees on
14 actions that could be taken to respond to, among other things, unplanned, abnormal releases
15 (e.g., leaks). When an unplanned release occurs at a nuclear power plant, the licensee should
16 identify the area as an “impacted area” for decommissioning planning purposes (NRC 2009).
17 Further, the licensee should assess the release for reporting it in its annual radioactive effluent
18 release report. Specifically, the location and estimated volume of the release should be
19 recorded to identify the extent of the impacted area and predicted size or extent of the
20 contaminant plume (NRC 2009). For leaks to groundwater, licensees should develop a site
21 conceptual model, using standards such as American National Standards Institute/American
22 Nuclear Society (ANSI/ANS) report 2.17–2010, “Evaluation of Subsurface Radionuclide
23 Transport at Commercial Nuclear Power Plants” to characterize, model, and monitor
24 groundwater flow and radionuclide transport (NRC 2009). This conceptual and subsequent
25 numerical model would be used as the basis for estimating the dispersion of radionuclide
26 releases to groundwater. The monitoring program would confirm whether remediation programs
27 are effective in precluding offsite impacts to groundwater resources.

28 **E.1.3 Remediation Techniques**

29 While the NRC does not require a specific approach to remediate radioactive contamination of
30 groundwater that may result from spent fuel pool leakage, various technologies are currently
31 available to remediate the contaminated groundwater. Licensees decide whether and how to
32 remediate a radioactive release to groundwater based on a variety of circumstances, including
33 the source and magnitude of the contamination events; the local and regional groundwater
34 systems (as reflected in the site conceptual model); the NRC’s regulatory requirements (e.g.,
35 the radiological criteria for license termination in 10 CFR Part 20, Subpart E); and other Federal,
36 State and local requirements (e.g., U.S. Environmental Protection Agency (EPA) drinking-water
37 standards).

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1 As described in Ferry et al. (1999) groundwater contamination can be limited and mitigated
2 through hydraulic isolation and capture, using groundwater extraction methods such as low-
3 discharge pumping wells and interceptor trenches or a funnel and gate system for near-surface
4 plumes. The extracted groundwater can be treated to remove highly absorptive radionuclides
5 (e.g., strontium-90 and cesium-137) using appropriate separation technologies (e.g., ion-
6 exchange systems). However, tritium cannot be absorbed in those systems.

7 Various separation technologies can be applied to remove contaminants from the extracted
8 groundwater. For radioisotopes of elements such as barium, cesium, cobalt, iodide,
9 manganese, plutonium, and strontium, various treatment technologies are commonly used in
10 the chemical- and wastewater-treatment industries. Most of these technologies can be broadly
11 classified into two groups, depending on the reaction mechanism involved (i.e., precipitation or
12 sorption [including ion exchange]) (IAEA 1999).

13 Using remediation techniques to reduce tritium concentrations to levels below concentrations
14 exceeding EPA drinking-water standards is more difficult than for other groundwater
15 contaminants because tritium cannot be chemically absorbed. In general, the method used to
16 remediate tritium is monitored natural attenuation with selective groundwater extraction for high-
17 concentration areas. Nevertheless, treatment technologies that have potential application for
18 reducing very high tritium levels in groundwater include water distillation, combined electrolysis
19 and catalytic exchange, bithermal hydrogen-water process, girdler sulfide process, palladium
20 membrane reactor, and the GE-Hitachi Nuclear Energy integrated systems (Geniesse and
21 Stegen 2009).

22 **E.2 Environmental Impacts of Spent Fuel Pool Leaks**

23 This section addresses the environmental impacts of spent fuel pool leaks that might occur
24 during the short-term storage timeframe. The NRC's Decommissioning Planning Rule,
25 discussed in Section E.1.2, requires licensees to identify the extent of significant residual
26 radioactivity at their sites, including the subsurface (NRC 2012b). Any significant radioactivity
27 identified by licensees must be addressed during the decommissioning process to meet the
28 license-termination requirements of 10 CFR Part 20, Subpart E. As a result, spent fuel pool
29 leaks that result in contamination that remains onsite are addressed as part of the
30 decommissioning and license-termination processes, and are outside the scope of this draft
31 *Waste Confidence Generic Environmental Impact Statement* (draft GEIS). The environmental
32 impacts resulting from both normal operations and accidents during decommissioning activities
33 and all onsite or offsite residual radioactive material that may remain after license termination
34 are addressed in "Generic Environmental Impact Statement on Decommissioning of Nuclear
35 Facilities" (NRC 2002) and "Generic Environmental Impact Statement in Support of Rulemaking
36 on Radiological Criteria for License Termination of NRC-Licensed Nuclear Facilities" (NRC
37 1997b), respectively.

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1 **E.2.1 Factors that Influence the Impacts of Spent Fuel Pool Leaks**

2 A combination of factors minimize the likelihood that a spent fuel pool leak occurring during the
3 short-term storage timeframe will result in noticeable offsite environmental impacts. The
4 combination of spent fuel pool design and maintenance; operational practices (e.g., spent fuel
5 pool leakage monitoring and groundwater monitoring), site hydrogeological characteristics; and
6 radionuclide-transport properties together make the likelihood very low that an undetected leak
7 from the spent fuel pool will migrate offsite. Some of these factors, plus NRC oversight and
8 regulatory controls, will ensure that licensees act to identify and diminish potential
9 consequences, should a leak that results in an offsite release occur.

10 **E.2.1.1 Spent Fuel Pool Design, Operation and Monitoring**

11 As noted below in Section E.3, spent fuel pool leaks have been detected at 13 nuclear power
12 plant sites. Spent fuel pool leaks, while unpredictable, seldom occur due to stringent design
13 features and operational controls. As discussed, all operating spent fuel pools are lined with
14 stainless-steel liners that form a leak-tight barrier between the water in the pool and the
15 concrete walls of the pool. In addition, all licensees actively monitor for leaks from spent fuel
16 pools and will continue to do so throughout the short-term storage timeframe. In most cases,
17 the combination of the spent fuel pool liner and leakage monitoring prevent spent fuel pool
18 water from leaking, undetected, into the environment. Further, as described in Section E.1.1,
19 the licensee is required to continuously ensure the integrity of the spent fuel pool liner and
20 structure by maintaining a low-corrosive environment in the spent fuel pool water through proper
21 water chemistry control.

22 Nonetheless, relatively small cracks can occur in the stainless-steel liner due to intergranular
23 stress-corrosion cracking and crevice corrosion of the stainless-steel liner, seam or plug weld
24 defects, or damage to the liner, resulting in leakage from the spent fuel pool (Copingier et al.
25 2012). For spent fuel pools with leakage-collection systems installed, these systems could
26 become clogged or obstructed, which could cause the water to back up in the space between
27 the liner and concrete. Spent fuel pool water that bypasses the collection system can migrate
28 through construction joints and cracks in the concrete due to shrinkage, creep, or alkali silica
29 reaction, resulting in release of contaminated water outside the pool. Whether resulting from
30 leakage through the liner or clogging in the leakage-collection system, spent fuel pool leaks are
31 uncommon and unpredictable. However, knowledge and techniques gained from earlier
32 industry and NRC studies of spent fuel pool leaks should result in heightened awareness of
33 leaks and earlier detection and mitigation.

34 Significant short-term water loss from a spent fuel pool is likely to be identified due to licensee
35 monitoring of spent fuel pool water levels. Furthermore, because of NRC requirements to
36 identify and minimize contamination (see Section E.1.2), licensees would likely identify and
37 mitigate, if necessary, the impacts from any significant short-term water loss before noticeable

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1 offsite environmental impacts would occur. As a result, this evaluation considers a long-term,
2 low-volume undetected leak from a spent fuel pool as the most probable scenario where spent
3 fuel pool leakage would lead to an offsite environmental impact. To go undetected, a leak
4 would need to be less than the fluctuations in water level of a spent fuel pool lost to evaporation.
5 This is so because the spent fuel pool water level is constantly measured by instrumentation
6 and monitored routinely by the reactor operators. Also, licensees must perform routine
7 inspections of leak-detection systems and physically inspect the spent fuel pool area for
8 leakage.

9 Based on operational experience, the model leak used for analysis here is assumed to
10 correspond to a leak rate of approximately 380 L/day [100 gpd] (NRC 2004). In analyzing the
11 impacts of a spent fuel pool leak, the NRC assumed a leak rate similar to the rate of water lost
12 due to evaporation, which would effectively double the makeup rate to the spent fuel pool. A
13 leak of this magnitude would likely be identified in an expeditious manner because of licensee
14 monitoring and surveillance.

15 In addition to spent fuel pool design and operational controls, licensees are required, as
16 described in Section E.1.2, to perform groundwater monitoring at nuclear power plant sites,
17 which makes it unlikely that leakage from the spent fuel pool would remain undetected long
18 enough for any contamination to migrate offsite. In addition, a groundwater-monitoring program
19 based on a site characterization that conforms to standards (e.g., ANSI/ANS 2.17–2010) and a
20 configuration of monitoring wells that takes into account the most likely leakage pathway (i.e.,
21 the spent fuel pool) would further reduce the likelihood that a leak would remain undetected long
22 enough for contamination to migrate offsite.

23 **E.2.1.2 Radionuclides in Spent Fuel Pools and Radionuclide Transport**

24 Impacts from spent fuel pool leakage occur from radionuclide contaminants present in spent fuel
25 pool water. The sources of radionuclide contaminants in spent fuel pool water are activation
26 products and fission products. Activation products are elements formed from the neutron
27 bombardment of a stable element and fission products are elements formed as a byproduct of a
28 nuclear reaction and radioactive decay of other fission products. The sources of activation
29 products are corrosion and wear deposits (including corrosion films on the fuel bundle surfaces).
30 Fission products come from bundles with rods that failed in-reactor or from intact bundles that
31 adsorbed circulating fission products (Johnson 1977).

32 Table E-1 lists radionuclides of concern expected to be present in the spent fuel pool water.
33 The initial concentration column represents the concentration of radionuclides assumed to be
34 present at the start of the short-term storage timeframe. The final concentration column
35 represents those radionuclides at the end of the short-term storage timeframe, assuming only
36 radioactive decay. Actual concentrations would vary based on the efficiency of the spent fuel
37 pool purification system and the integrity of the spent fuel assemblies stored in the pool.

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1 Because of radioactive decay and the spent fuel pool purification system, spent fuel pool leaks
2 that occur later in the short-term storage timeframe will likely have less impact on onsite soil and
3 groundwater quality due to the lower concentration of radionuclides present in the leaked spent
4 fuel pool water.

5 **Table E-1. Spent Fuel Pool Radionuclides of Concern**

Nuclide	Half-Life^(a)	Initial Concentration (micro Curies per milliliter)^(b)	Final Concentration (micro Curies per milliliter)
Co-58	72 days	3.5×10^{-4}	–
Co-60	5.3 years	8.0×10^{-4}	3.1×10^{-7}
Cs-134	2.1 years	8.6×10^{-4}	–
Cs-137	30 years	1.3×10^{-3}	3.3×10^{-4}
H-3	12.3 years	2.9×10^{-2}	1.0×10^{-3}
Sr-90	28.8 years	5.9×10^{-6}	1.4×10^{-6}

(a) Johnson (1977).

(b) NRC (2006b).

6 As discussed in the preceding section, spent fuel pool water with radioactive contaminants
7 could leak through small, intergranular stress-corrosion or crevice-corrosion cracks in the
8 stainless-steel liner into the space between the liner and the concrete. Because concrete has a
9 very low permeability, it serves as an additional barrier between leaked spent fuel pool water
10 and the environment. However, contaminated water could migrate to the environment through
11 construction joints and cracks in the concrete if the water backs up in the space between the
12 liner and concrete and a sufficient hydraulic head is developed. As radionuclides migrate
13 through the concrete structure, their concentrations in the leaked water and the volume released
14 to the environment could be reduced by sorption onto the concrete material. Sorption, a
15 process by which a substance in solution attaches onto a solid material, can retard the
16 movement of radionuclides and thus reduce radionuclide concentrations in the leaked water.

17 Spent fuel pool water will likely leave the concrete structure at or near the ground surface and
18 above the local unconfined water table. The initial migration of radionuclides from the spent fuel
19 pool leak is usually vertically downward through the vadose zone, i.e., the surrounding and
20 underlying unsaturated soil, backfill, or other near-surface, disturbed materials. However, the
21 direction, rate, and volume of the leaked spent fuel pool water migration in the vadose zone is
22 influenced by the zone's ambient water content, the moisture and pressure gradients within the
23 material, and the associated volume of the liquid released that may cause local saturation (or
24 perching of the released fluid) due to the material's inability to transmit water at the rate
25 released (i.e., insufficient permeability).

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1 If a sufficient leak volume is released or the unsaturated material underlying the pool has
2 hydrologic conditions to transmit the leaked water, the soil “wetting event” associated with the
3 spent fuel pool leak can cause vertical radionuclide migration to reach an underlying shallow
4 water table or unconfined aquifer (i.e., a saturated hydrogeological unit) and thus contaminate
5 the aquifer. The rate of water movement would depend on the existing water content of the
6 porous media and the permeability (an intrinsic property of the porous media related to pore
7 sizes). For low water contents, the rate of water movement downwards would be slow.
8 Consequently, it is possible that the water would initially be contained within the site area, but if
9 the leak continues to be undetected, it will flow downwards in the direction of the aquifer. Once
10 in the aquifer, the travel time to the environment outside the controlled boundary would depend
11 upon the hydraulic gradient, the hydraulic properties of the aquifer, and the distance to the site
12 boundary.

13 Various hydrologic and chemical processes could reduce the environmental impacts of
14 radionuclides associated with leaked spent fuel pool water. As the contaminant plume evolves,
15 the radionuclide concentrations may continue to decrease due to mixing, dilution, and
16 radioactive decay. Different radioisotopes decay at different rates depending on their half-lives
17 (see Table E-1). In addition, adsorption of radionuclides onto the aquifer matrix material may
18 significantly delay the transport of radionuclides in the subsurface environment and keep
19 radionuclide concentrations at low levels in groundwater. Further, adsorption may retard the
20 movement of radionuclides because radionuclide mass is adsorbed on solid surfaces and
21 becomes unavailable for transport by water. Although desorption of radionuclides from the
22 aquifer matrix material back into the groundwater may eventually occur, concentrations will be
23 much less than if no sorption occurred. Different radionuclides have different degrees of
24 adsorptive interaction with geologic media due to the geologic materials and water chemistry.
25 Some radionuclides (e.g., tritium) do not adsorb onto soil and bedrock and, therefore, move
26 generally at the same rate and direction as groundwater. Other radionuclides (e.g.,
27 strontium-90 and cesium-137) strongly adsorb onto geologic media and, thus, move much
28 slower than the groundwater velocity and at reduced concentrations compared to the source of
29 a leak. The degree of radionuclide adsorption and retardation depends on the properties of the
30 geologic media (e.g., mineralogy, reactive surface area, and presence of organic matter) and
31 groundwater chemistry (e.g., pH, oxidation-reduction potential, and complexing ion
32 concentration).

33 **E.2.1.3 Influence of Site Hydrological Conditions**

34 Although it is unlikely that a leak from a spent fuel pool of sufficient magnitude and duration
35 would go undetected long enough to result in offsite consequences, other factors act to mitigate
36 any potential impacts should the unexpected occur. In particular, characteristics of ground
37 water flow and transport of radionuclides in ground water would limit the amount of radioactivity
38 that would travel offsite and reduce its concentration. A review of Final Safety Analysis Reports

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1 for existing and proposed nuclear power plants, licensee Radioactive Effluent and
2 Environmental Reports, and other relevant reports indicates that nuclear power plants have
3 certain common hydrologic characteristics such as being located near large bodies of water and
4 being sited in areas where the presence of a vadose zone would tend to reduce the amount of
5 radioactive material leaving the site and lessen the concentration. Because of the siting criteria
6 of 10 CFR Part 100 spent fuel pools are often located, and will continue to be located in areas
7 with certain similar hydrologic characteristics.

8 By their nature, nuclear power plants require large volumes of water to provide cooling to plant
9 systems. As a result, nuclear power plants, which include spent fuel pools, are typically located
10 adjacent to, or near, large surface waterbodies (e.g., rivers, lakes, and oceans). Regional
11 groundwater flow in the vicinity of most spent fuel pools, particularly shallow water table or
12 unconfined aquifer flow, is toward these large surface waterbodies. Localized water table flow
13 around spent fuel pools can be influenced by a variety of physical features and hydrological
14 conditions. Subsurface features (e.g., basements) or surface features (e.g., buildings and
15 paved areas) can result in localized disturbances to shallow groundwater flow directions and
16 velocities. In addition, short-term (transient) factors (e.g., droughts, floods, and daily tidal
17 influences) can induce a temporary change in shallow groundwater flow directions and rates.
18 Nevertheless, despite these localized or short-term effects, the NRC's assessment of hydrologic
19 conditions at existing nuclear power plant sites indicates that the water table aquifers at these
20 sites typically have a predominantly horizontal flow component with ultimate discharge into an
21 adjacent or nearby large waterbody.

22 Because most nuclear power plants are located at sites where the shallow unconfined
23 groundwater at the site flows into the nearby surface waterbody, leaked water from the spent
24 fuel pool at these sites would travel towards, and ultimately discharge into, the nearby surface
25 waterbody. This travel time is often significant due to the fact that the typical spent fuel pool
26 location adjacent to or in the vicinity of a large surface waterbody coincides with a relatively flat
27 (i.e., small) hydraulic gradient in the shallow water table. The long travel times produced from a
28 flat hydraulic gradient allow significant radiological decay of spent fuel pool leak-related
29 radiological constituents resulting in reduced concentrations in the shallow water table.
30 Nevertheless, even if one ignores the reduction in leak-related radiological constituent
31 concentrations due to radiological decay, by volume, the largest undetectable spent fuel pool
32 leak (approximately 380 L/day [100 gal/day]) is orders-of-magnitude less than flow rates or
33 volumes of surface waterbodies typically located near nuclear power plant sites.

34 Given the need to locate nuclear power plants near large surface waterbodies, the fact that
35 reactors are typically sited in areas of lower population density, and the often large size of the
36 licensee-controlled area surrounding the spent fuel pool and entire facility, it is unlikely to have
37 groundwater users located between the spent fuel pool and the nearest receiving surface
38 waterbody (i.e., it is unlikely to have groundwater users downgradient of the spent fuel pool, but

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1 upgradient of the surface waterbody). As a result, it is unlikely that local groundwater users
2 would be situated in the downgradient path of a spent fuel pool related groundwater plume.
3 Moreover, due to the large size of the licensee-controlled area and the typical upgradient
4 location of local groundwater users with respect to the spent fuel pool, it is not expected that
5 local groundwater pumping will have a significant influence on shallow groundwater flow
6 conditions near the spent fuel pools (i.e., capture the spent fuel pool related plume due to
7 pumping). Consequently, for nuclear power plant sites with typical hydrological conditions, it is
8 unlikely that any shallow water table aquifer users in the vicinity of the nuclear power plant
9 would be affected by water leaked from a spent fuel pool. Rather, for spent fuel pools located at
10 sites with these typical characteristics, the environmental impacts of spent fuel pool leakage
11 would result from the discharge of contamination to the surface waterbody.

12 In many cases, groundwater users located outside the licensee-controlled area surrounding
13 spent fuel pool locations use deeper confined aquifers (i.e., deeper aquifers separated from the
14 shallow water table by one or more horizontally continuous low-permeability layers). Potable
15 water supply wells are often intentionally placed in deeper aquifer units because of the
16 sensitivity of shallow water table aquifers to surficial sources of contamination (e.g., septic
17 systems) and the impacts to shallow water supplies from climate variability. In addition, as with
18 the shallow groundwater users discussed above, the fact that licensees typically maintain
19 control of large areas of land surrounding the plant (i.e., large distance between spent fuel pool
20 and local groundwater users) makes it highly unlikely that local groundwater pumping in the
21 deeper confined aquifer would significantly influence shallow aquifer horizontal or vertical
22 gradients at the spent fuel pool location. Moreover, it would be improbable for local deep
23 aquifer potable wells to capture spent fuel pool affected groundwater from a shallow unconfined
24 aquifer separated from the deeper system by a low-permeability confining layer.

25 Consequently, for nuclear power plant sites that exhibit the hydrologic conditions discussed
26 above, the offsite environmental impacts would be minimal because groundwater contamination
27 would likely stay onsite where the licensees would be required to address any residual
28 contamination as part of the license-termination process. Alternatively, if discharged to a large
29 waterbody, as discussed in Section E.2.2.2, dilution would reduce concentrations below
30 analytical detection limits.

31 For spent fuel pools located at sites with hydrological conditions different from those described
32 above, a leak from a spent fuel pool has the potential to affect nearby groundwater users.
33 These potential impacts are discussed in Section E.2.2.1.

34 **E.2.2 Analysis of the Impacts of Spent Fuel Pool Leaks**

35 Systems or structures can experience undetected radioactive leaks over a prolonged period and
36 those that are buried or in contact with soil (e.g., spent fuel pools) are particularly susceptible to
37 undetected leakage (NRC 2006b). An important conclusion of the NRC Lessons Learned Task

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1 Force report (see Section E.3.1) is that the near-term health of the offsite public was not
2 impacted by inadvertent liquid releases to the environment that have occurred due to previous
3 spent fuel pool leaks at U.S. nuclear facilities (NRC 2006b). As a result, environmental impacts
4 from past leaks to groundwater have been minimal. Further, a senior management review of
5 the NRC Groundwater Task Force (see Section E.3.1) concurred with the Groundwater Task
6 Force's conclusion that the NRC is accomplishing its stated mission of protecting public health,
7 safety, and the environment through its response to groundwater leaks and spills, consistent
8 with its regulatory framework (NRC 2011a). This protection will continue through the short-term
9 timeframe and will likely continue to be strengthened based on operating experience.

10 In the unlikely event of offsite migration, offsite physical resources that might be adversely
11 affected by spent fuel pool leaks are groundwater, surface water, and soils. Potential public
12 health impacts through these affected resources must also be considered. As described in
13 Sections E.2.1.1–E.2.1.3, a variety of factors work together to make it unlikely that a leak from a
14 spent fuel pool would result in offsite consequences. These include design and operational
15 controls for the spent fuel pool, which should result in the detection and resolution of a leak
16 before it develops sufficient volume to migrate offsite; radionuclide-transport properties, which
17 would result in lower contaminant concentrations in the leak volume; and site hydrological
18 characteristics, which lessen the likelihood that a leak would migrate offsite. As discussed in
19 Section E.1.3, various remediation strategies can be employed in the event of a leak; however,
20 the decision about whether and how to remediate a radioactive release to groundwater is based
21 on a variety of circumstances including, but not limited to, the magnitude of the contamination,
22 the NRC's regulatory requirements (e.g., the radiological criteria for license termination
23 described in 10 CFR Part 20, Subpart E), and other Federal, State and local requirements (e.g.,
24 EPA drinking-water requirements).

25 **E.2.2.1 Groundwater**

26 Historically, radiological contamination from spent fuel pool leaks has remained onsite within
27 each licensee's owner-controlled area or travelled to a nearby surface waterbody (see
28 Section E.3). Because these leaks have remained onsite or were discharged to large surface
29 waterbodies, where significant dilution occurred, there have been no impacts to any offsite
30 groundwater wells used as a potable resource. As described in Section E.2.1.3, this is mainly
31 because the duration or volume of water leaked from the spent fuel pool was insufficient to
32 result in elevated radionuclide concentrations away from the source or that the spent fuel pools
33 are sited in areas where the hydrologic conditions impede the flow of leaked water away from
34 the source (e.g., flat hydraulic gradient) or direct flow to the nearby surface waterbody where
35 dilution occurs.

36 In the short-term timeframe, spent fuel pool design (stainless-steel liners and leakage-collection
37 systems) and operational controls (monitoring and surveillance of spent fuel pool water levels)
38 make it unlikely that a leak will remain undetected long enough to exceed any regulatory

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1 requirement (e.g., the NRC dose limit or EPA-mandated Maximum Contaminant Level) in the
2 offsite environment. In addition, onsite groundwater monitoring required to comply with
3 10 CFR 20.1501 provides added protection with respect to identifying a spent fuel pool leak
4 and, if necessary, isolating and remediating contaminated groundwater onsite. Besides these
5 measures, the hydrologic characteristics associated with typical nuclear power plant settings
6 (see Section E.2.1.3)—such as their location near large waterbodies (due to cooling
7 requirements), shallow water table flow direction toward these waterbodies, flat hydraulic
8 gradients in the shallow water tables, large distance to local groundwater users, and the
9 likelihood that local groundwater usage is in deeper confined aquifers—would act to impede the
10 offsite migration of future spent fuel pool leakage. Finally, current and future spent fuel pool
11 sites are required to have routine environmental monitoring programs in place that should take
12 samples at offsite groundwater sources (e.g., potable or irrigation) in areas where the hydraulic
13 gradient or recharge properties are suitable for contamination (NRC 1991a,b). Further, any
14 detection of onsite contamination would likely result in additional monitoring, including additional
15 sampling of any nearby private wells, as part of an expanded environmental monitoring
16 program. With these measures and characteristics in place, it is improbable that offsite
17 migration of spent fuel pool leaks will occur or go undetected.

18 In the **very unlikely** event that a leak goes undetected and the resulting groundwater plume
19 reaches the offsite environment, it is possible that the leak could be of a sufficient enough
20 magnitude and duration that contamination of a groundwater source above a regulatory limit
21 (i.e., a Maximum Contaminant Level for one or more radionuclide) could occur. ~~As a result, the~~
22 ~~NRC acknowledges that the radiological impacts to groundwater quality resulting from a spent~~
23 ~~fuel pool leak during the short-term timeframe would be SMALL to MODERATE. But, B~~because
24 of the relatively small size of the maximum assumed leak rate, the impacts to groundwater
25 would be highly localized and would not be expected to impact regional groundwater resources.
26 If contamination from a spent fuel pool leak were to exceed a Maximum Contaminant Level for
27 one or more radionuclides at a groundwater source that currently supplies water to public water
28 supplies or that has the potential to supply a public water supply (including private wells), the
29 EPA could take emergency action under the Safe Drinking Water Act (EPA 1991). Emergency
30 actions include, but are not limited to, providing alternative water supplies, public notification of
31 potentially affected users, and remediation of the contamination (EPA 1991).

32 The impacts of a spent fuel pool leak on offsite groundwater depend on many factors, including
33 the volume and rate of water released from the spent fuel pool, the radionuclide content and
34 concentration and water chemistry of the spent fuel pool water, the direction of groundwater
35 flow, the distance to an offsite groundwater receptor, the velocity or transport rates of
36 radionuclides through the subsurface, and radioactive decay rates. However, as discussed
37 previously, it is unlikely that a leak of sufficient quantity and duration could occur without
38 detection, or that such a leak would not be impeded by the hydrologic characteristics typical at
39 spent fuel pool locations. Therefore, based on the low probability of a leak with sufficient

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1 quantity and duration to reach offsite locations, the detection and monitoring mechanisms
2 available to licensees and the NRC, and the hydrologic characteristics at typical spent fuel pool
3 sites, the NRC concludes that the radiological impacts to groundwater quality resulting from a
4 spent fuel pool leak during short-term timeframe would be SMALL.

5 **E.2.2.2 Surface Water**

6 Spent fuel pool leaks can result in discharges of radionuclides to offsite surface waters. The
7 concentrations of radionuclides in offsite surface waters will depend on the rate of release from
8 the spent fuel pool, the direction and rate of groundwater flow, the distance to nearby offsite
9 surface waters toward which groundwater flows, the velocity or transport rates of radionuclides
10 through the subsurface, and radioactive decay rates. For a given rate of release, the
11 concentrations of radionuclides and, consequently, the presence of radionuclides in surface
12 water would be dependent on the duration of the spent fuel pool leak.

13 However, because surface waterbodies in the vicinity of nuclear power plants (e.g., oceans,
14 lakes, rivers, or large man-made cooling-water impoundments) are large enough to meet
15 reactor cooling requirements, a large volume of surface water is usually available, which would
16 dilute any groundwater contaminants that flow into them. This dilution ensures that
17 radionuclides present in groundwater with concentrations exceeding the Maximum Contaminant
18 Level for that radionuclide are diluted well below EPA safe drinking-water limits.

19 To illustrate the low releases that would be associated with leaked spent fuel pool water, the
20 NRC estimated the annual discharge rate associated with a leakage of 380 L/day [100 gpd] of
21 radionuclides in spent fuel pool water at concentrations shown in Table E-1. These values can
22 be compared in Table E-2 below to the annual liquid effluent discharges in 2008 for boiling
23 water reactors and pressurized water reactors (NRC 2010b). Values for strontium-90 are not
24 reported in the NRC annual effluent discharge report.

25 **Table E-2.** Comparison of Radionuclides Released From a Spent Fuel Pool Leak to
26 Radionuclides Discharged During Normal Operations

Radionuclide	Spent Fuel Pool Leakage, Ci/yr	Boiling Water Reactor Effluent Range, Ci/yr	Pressurized Water Reactor Effluent Range, Ci/yr
Co-58	4.8×10^{-4}	1.50×10^{-5} to 6.97×10^{-3}	6.51×10^{-5} to 8.29×10^{-3}
Co-60	1.1×10^{-3}	3.35×10^{-5} to 7.66×10^{-2}	1.11×10^{-4} to 4.84×10^{-3}
Cs-134	1.2×10^{-3}	2.19×10^{-5} to 3.37×10^{-4}	7.00×10^{-8} to 4.48×10^{-4}
Cs-137	1.8×10^{-3}	1.91×10^{-6} to 1.95×10^{-3}	1.13×10^{-6} to 1.37×10^{-3}
H-3	4.0×10^{-2}	1.13×10^{-3} to 1.27×10^2	1.59×10^2 to 1.66×10^3

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1 As shown in Table E-2, even in the highly unlikely event that undetected spent fuel pool leakage
2 flowed continuously (24 hours per day, 365 days per year) and unimpeded to local surface
3 waters, the quantities of radioactive material discharged to nearby surface waters would be
4 comparable to values associated with permitted, treated effluent discharges from operating
5 nuclear power plants.

6 Based on these considerations, the NRC concludes that the impact of spent fuel pool leaks on
7 surface water would be SMALL.

8 **E.2.2.3 Soils**

9 Spent fuel pool leaks could result in radiological contamination of offsite soils. The degree of
10 offsite soil contamination will depend on the rate of release from the spent fuel pool, direction of
11 groundwater flow, the distance to offsite locations, the velocity or transport rates of
12 radionuclides through soils, and radioactive decay rates. For a given rate of release, the soil
13 radionuclide concentrations and mass of soil contaminated would be dependent on the duration
14 of the spent fuel pool leak.

15 As noted in Section E.2.1.2, the degree to which offsite surface soils could become
16 contaminated as a result of spent fuel pool leaks depends on the mobility of radionuclides in the
17 onsite soil. Most radionuclides, other than tritium, that are present in detectable concentrations
18 in spent fuel pools (e.g., isotopes of cesium and strontium) are absorbed to soil and thus move
19 at a fraction of local groundwater velocities toward offsite locations. As a result, the presence of
20 tritium in onsite groundwater-monitoring wells is usually the first indication that a spent fuel pool
21 is leaking.

22 As stated above in Section E.2.2.1, tritium in groundwater is likely to be observed as part of a
23 licensee's radiological environmental monitoring program and corrective action would be taken
24 consistent with Federal and State requirements. In addition, most radionuclides move at a
25 much slower rate and are much more likely to be absorbed to the concrete structures of the
26 spent fuel building and the soil surrounding the leak location. As a result, most soil
27 contamination from spent fuel pool leaks would be expected to remain onsite and, therefore,
28 offsite soil contamination is unlikely to occur. Therefore, the NRC concludes that the
29 environmental impact of spent fuel pool leaks to offsite soils would be SMALL.

30 **E.2.2.4 Public Health**

31 For the purposes of assessing radiological impacts, environmental impacts are considered to be
32 SMALL if releases and doses do not exceed permissible levels set by the NRC and the EPA.
33 Therefore, the impact to public health would be SMALL if the spent fuel pool leakage was
34 detected and remediated before regulatory limits for drinking water (e.g., EPA Maximum
35 Contaminant Level) or effluent discharges (NRC dose limits in 10 CFR Part 50, Appendix I)

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1 were exceeded. As described above, should a pool leak continue undetected for a long period,
2 a highly localized exceedance of groundwater protection limits could occur. Public health
3 concerns related to groundwater contamination would be limited to private wells nearest the
4 site. Surface water and aquifers will not be significantly affected for the reasons discussed in
5 Sections E.2.2.1 and E.2.2.2. In the event of uncontrolled and undetected discharges
6 associated with long-term spent fuel pool leaks to nearby surface waters, the annual discharge
7 would be comparable to normal discharges associated with operating reactors, and would likely
8 remain below limits in 10 CFR Part 50, Appendix I. In the very unlikely event that a pool leak
9 remained undetected for a long period, public health regulatory limits (i.e., EPA drinking-water
10 standards) could be exceeded, and, therefore, the NRC has determined that public health
11 impacts could be SMALL to MODERATE in such circumstances. However, as discussed in
12 Section E.2.2.1, it is unlikely that a leak of sufficient quantity and duration could occur without
13 detection or that such a leak would not be impeded by the hydrologic characteristics typical of
14 spent fuel pool locations. Therefore, based on the low probability of a leak affecting offsite
15 groundwater sources, the NRC concludes that impacts to public health resulting from a spent
16 fuel pool leak during short-term timeframe would be SMALL.

17 E.2.2.5 Summary

18 Table E-3 summarizes the NRC impact determinations for the resource areas discussed in
19 Sections E.2.2.1 through E.2.2.4.

20 **Table E-3.** Summary of Environmental Impacts of Spent Fuel Pool Leakage

Resource Area	Impact Determination
Groundwater	SMALL
Surface Water	SMALL
Soils	SMALL
Public Health	SMALL

21 E.3 Historical Data on Spent Fuel Pool Leakage

22 Although the evaluation of spent fuel pool leaks in Section E.2 focuses on the potential impacts
23 of leaks during short-term storage timeframe, it is helpful to review the historical occurrences of
24 spent fuel pool leaks. A review of past spent fuel pool leakage events helps to establish a
25 baseline for the analysis of future impacts and provide context to those impacts. Available data
26 and information indicate that spent fuel pool leakage has occurred at the 13 sites listed in
27 Table E-4 (NRC 2006b, 2010c; NRC 2010d; Copinger et al. 2012). Spent fuel pool leakage at
28 boiling water reactor plants has been identified primarily through leak-detection systems. Spent
29 fuel pool leakage at pressurized water reactor plants has been detected in the leak-chase
30 system (channels installed behind spent fuel pool liner welds); as seepage associated with
31 concrete cracks; by the presence of white deposits on structures (boric acid precipitate); by the

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1 presence of moisture in the seismic gap between the fuel-handling building and auxiliary
 2 building; by the presence of abnormally high levels of tritium in groundwater (i.e., above normal
 3 background levels of approximately 200 pCi/L and by contamination of protective clothing)
 4 (Copinger et al. 2012).

5 **Table E-4.** Occurrence of Spent Fuel Pool Leakage at U.S. Nuclear Power Plants

Site	Date(s) of Leak Discovery	Radioactive Liquid Released to Environment?	Radionuclides Detected
Hatch	December 1986	Yes	Tritium
Indian Point (Units 1 and 2)	August 2005; Unit 1 leakage predates August 2005	Yes	Tritium, nickel-63, cesium-137, strontium-90, and cobalt-60
Palo Verde (Unit 1)	July 2005	Yes	Tritium, cobalt-60, antimony-125, and cesium-137
Salem (Units 1 and 2)	September 2002 (Unit 1) 2010 (Unit 2)	Yes	Tritium
San Onofre (Unit 1)	1986	Yes ^(a)	Tritium, cesium-137
Seabrook	June 1999	Yes	Tritium
Watts Bar (Unit 1)	August 2002	Yes	Tritium and mixed fission products
Crystal River (Unit 3)	2009	No ^(b)	—
Davis-Besse (Unit 1)	2000	No ^(b)	—
Diablo Canyon (Units 1 and 2)	2010	No ^(b)	—
Duane Arnold	1994	No ^(b)	—
Hope Creek	2009	No ^(b)	—
Kewaunee	2007	No ^(c)	—

Sources: NRC 2006b; NRC 2010c; NRC 2010d; Copinger et al. 2012

(a) Contaminated groundwater was discovered during the decommissioning of San Onofre Unit 1. The source of the contaminated water was not clearly identified, but was suspected to have originated from any of three sources, one of which was leakage from the spent fuel pool that occurred from ~~1986-1989~~ 1986 to 1989 (NRC 2010d). Environmental monitoring performed by the licensee subsequent to the leak did not identify radionuclides in the environment attributable to San Onofre (SCE 1995).

(b) Leaked spent fuel pool water was contained within spent fuel pool leakage-collection system.

(c) White boric acid deposits, possibly boric acid, observed on the wall and ceiling of the waste drumming room adjacent to the spent fuel pool.

6 At several of the sites listed in Table E-4, namely Indian Point (Units 1 and 2), Palo Verde
 7 (Unit 1), Salem (Units 1 and 2), Seabrook, and Watts Bar, spent fuel pool leakage has resulted
 8 in inadvertent liquid radioactive releases to the environment. Releases that were known to have
 9 occurred to the environment from spent fuel pool leakage prior to 2006 were examined by the
 10 NRC Liquid Radioactive Release Lessons Learned Task Force as part of its review of historical
 11 information on abnormal, unplanned, unmonitored releases of radioactive liquids into the

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1 environment from nuclear power plants (NRC 2006b). The NRC Groundwater Task Force
 2 (NRC 2010c) reviewed data on releases to groundwater that occurred subsequent to the
 3 publication of the Lessons Learned Task Force report. A more recent study identified other
 4 nuclear power facilities that have experienced spent fuel pool leakage, including Crystal River
 5 Unit 3, Davis-Besse Unit 1, Diablo Canyon Units 1 and 2, Duane Arnold, Hope Creek, and
 6 Kewaunee (Copingier et al. 2012). For those facilities, with the exception of Kewaunee, the
 7 leakage was contained within the spent fuel pool leakage-collection system.

8 Table E-5 lists the maximum tritium contamination detected onsite and at offsite locations from
 9 the spent fuel pool leakage events. ~~The table shows that contamination had not migrated offsite~~
 10 ~~at the time the data were collected.~~ None of the spent fuel pool leakage events listed in Table E-
 11 5 are known to have resulted in contamination of drinking water.

12 **Table E-5.** Dose from Inadvertent Releases of Radioactive Liquids from Nuclear Power Plant
 13 Spent Fuel Pools

Site	Maximum Tritium Contamination (pCi/L) Detected Within the Site Boundary	Maximum Water Contamination (pCi/L) at Offsite Locations	Receptor and Pathways	Yearly Dose (mrem)
Hatch	(a)	None detected at offsite water sources; long-term monitoring in place	Negligible NA	Negligible NA
Indian Point ^(b)	200,000 for tritium (100 for nickel-63 50 for strontium-90)	Approximation made in dose calculations	MEI ^(bc)	0.0021 ^(d)
Salem	15,000,000 ^(ee)	None detected	NA	NA
Seabrook	750,000	Groundwater plume has not migrated offsite	Negligible NA	Negligible NA
Watts Bar	30,000	Groundwater plume has not migrated offsite	Negligible NA	Negligible NA

Source: NRC 2013

(a) ~~(a)~~ Approximately 124,000 gallons of liquid containing 0.2 Ci of tritium and 0.373 Ci of mixed fission products were released to a swamp which is located in the owner-controlled area. ~~No public dose is calculated for releases to owner-controlled area.~~

(b) Source: Entergy 20056

(bc) MEI = Maximally exposed individual: A hypothetical individual who, because of proximity, activities, or living habits, could potentially receive the maximum possible dose of radiation or of a hazardous chemical from a given event or process.

(ed) Total body dose was calculated based on the assumption that all onsite groundwater discharged directly to the Hudson River (Entergy 20056). The calculated dose represents 0.0021% of the NRC's radiation dose limit to individual members of the public, as defined in 10 CFR Part 20.

(e) Maximum tritium level in sample of groundwater near the seismic gap; extensive groundwater remediation program in place.

NA = Not applicable because water contamination was not detected at offsite locations.

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1 NRC Groundwater Task Forces

2 In 2006, the NRC chartered an in-house Lessons Learned Task Force to conduct a systematic
3 lessons-learned review of unplanned, unmonitored releases of radioactive liquids into the
4 environment from nuclear plants, which included inadvertent releases from spent fuel pools as
5 well as other plant systems. The Lessons Learned Task Force reviewed industry experience,
6 associated public health impacts (if any) of the radioactive liquid releases into the environment,
7 the NRC regulatory framework, related NRC inspection and enforcement programs, industry
8 reporting requirements, past industry actions following significant inadvertent releases,
9 international perspectives (principally from the Canadian experiences with tritium releases), and
10 NRC communications with members of the public. In its final report (NRC 2006b), the Lessons
11 Learned Task Force made 26 recommendations that generally addressed enhanced regulations
12 or regulatory guidance for unplanned, unmonitored releases; additional reviews in the areas of
13 decommissioning funding and license renewal; and enhanced public communications.

14 The most significant conclusion of the Lessons Learned Task Force was with respect to public
15 health impacts. Although a number of industry events have caused radioactive liquid releases
16 to the environment in an unplanned and unmonitored manner, based on the available data, the
17 task force did not find any instance where the radioactive liquid releases affected the health of
18 the public (NRC 2006b).

19 In 2010, following further inadvertent, abnormal releases of radionuclides to the environment
20 from nuclear power plant operations, the NRC established a second task force, referred to as
21 the NRC Groundwater Task Force. The job of the Groundwater Task Force was to reevaluate
22 the recommendations in the Lessons Learned Task Force final report; review NRC staff actions
23 to address the issue of leaks from buried piping at nuclear power plants; and review the actions
24 taken in response to more recent releases of tritium from systems other than those associated
25 with spent fuel pools into groundwater at nuclear facilities. The scope of the Groundwater Task
26 Force work included industry experience; health impacts; the regulatory framework; NRC
27 inspections and analyses; enforcement and reporting aspects; industry actions; international
28 perspectives; and communications with external stakeholders. After completing its review, the
29 Groundwater Task Force determined that the NRC is accomplishing its stated mission of
30 protecting public health, safety, and the environment through its response to groundwater leaks
31 and spills. The Groundwater Task Force concluded that within the current regulatory structure,
32 NRC is correctly applying requirements and properly characterizing the relevant issues (NRC
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Appendix F

Spent Fuel Pool Fires

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Appendix F

Spent Fuel Pool Fires

1 This appendix examines the environmental impacts of a spent fuel pool fire during the short-
2 term storage timeframe.¹ The environmental impacts of spent fuel pool fires described in this
3 appendix support the U.S. Nuclear Regulatory Commission's (NRC's) generic determination of
4 the environmental impacts of spent fuel pool fires and their risk, as described in Section 4.18.2.1
5 of this draft *Waste Confidence Generic Environmental Impact Statement* (draft GEIS).² The
6 NRC has conducted extensive evaluations of the risk and impacts of spent fuel pool fires. While
7 initial studies were concerned with spent fuel pool fire risk during the operating life of a reactor,
8 a risk study completed in 2001 examined the risk of a spent fuel pool fire during the reactor
9 decommissioning period (NRC 2001). The analysis in this appendix shows that the probability-
10 weighted impacts, or risk, from a spent fuel pool fire for the short-term storage timeframe are
11 SMALL because, while the consequences from a spent fuel pool fire could be significant and
12 destabilizing, the probability of such an event is extremely remote. The NRC's probability-
13 weighted impact analysis is presented in the following sections.

14 **F.1 Introduction**

15 The probability of spent fuel pool accidents is the sum of initiating event frequencies that can
16 lead to a spent fuel pool fire, and represents the NRC's best forward-looking judgment
17 concerning spent fuel pool fire risk during the short-term storage timeframe. The potential
18 consequences are considered in light of these probabilities and expressed in several different
19 measures of impacts (e.g., collective radioactive dose to the public and economic
20 consequences).

21 As detailed in the following sections, the impacts from a spent fuel pool fire are expressed in
22 terms of both the consequence that would occur if the accident occurred and as a probability-
23 weighted consequence. The probability-weighted consequence, also known as risk, is a

¹ As discussed in Section 1.8, the NRC assumes that all spent nuclear fuel (spent fuel) is removed from the pools and placed in dry-cask storage by the end of the short-term storage timeframe. This appendix, therefore, does not analyze the impacts of a spent fuel pool fire after the short-term storage timeframe because a spent fuel pool will not be used to store spent fuel after that time.

² Historically, the NRC has devoted considerable attention to the topic of this appendix, reflected in the detailed analyses and studies discussed in the appendix. In light of the historic interest of the public in this issue, as evidenced by comments in NRC's Waste Confidence rulemaking, as well as related litigation, this appendix provides a more detailed discussion of referenced materials and studies that underlie the analyses of spent fuel pool fires in the body of this draft GEIS.

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1 quantitative measure of the severity of the accident that accounts for the likelihood of its
2 occurrence. The probability-weighted consequence is computed by multiplying a consequence,
3 such as cumulative dose, cost to the local economy, or area of land contamination, by the
4 probability of the accident's occurrence. In the following analyses, the NRC first provides a
5 discussion of the consequences of a spent fuel pool fire. The NRC then determines the risk of a
6 spent fuel pool fire by looking at the probability of this type of event during the short-term
7 storage timeframe and multiplying the probability by the consequences. The probability-
8 weighted consequences provide the expected environmental impacts of the continued storage
9 of spent fuel during the short-term storage timeframe.

10 A significant portion of the NRC's analysis for spent fuel pool fires during the short-term storage
11 timeframe is derived from NUREG-1738, "Technical Study of Spent Nuclear Fuel Pool Accident
12 Risk at Decommissioning Nuclear Power Plants" (NRC 2001). This study represents the NRC's
13 current judgment as to the expected impacts from a spent fuel pool fire during the short-term
14 storage timeframe.

15 **F.2 Environmental Impacts of Spent Fuel Pool Fires**

16 In the event of an accident that leads to a loss of water in a spent fuel pool (via rapid drainage
17 or extended boiling), without successful efforts to replenish the lost water, spent fuel
18 temperatures could increase significantly. If cooling of the spent fuel were not reestablished,
19 the fuel could heat up to temperatures on the order of 1,000°C (1,832°F). At this temperature,
20 the spent fuel's zirconium cladding would begin to react with steam or air in a highly exothermic
21 chemical reaction called a runaway zirconium oxidation reaction or autocatalytic ignition. This
22 accident scenario is often referred to as a "spent fuel pool zirconium fire." Radioactive aerosols
23 and vapors released from the damaged spent fuel could be carried throughout the spent fuel
24 pool building and into the surrounding environment. This release could lead to exposures of the
25 surrounding population and contamination of property (e.g., land or structures) in the vicinity of
26 the site.

27 Under certain conditions, the high temperature runaway zirconium oxidation reaction occurring
28 in one part of the pool could also spread to other spent fuel in the pool. The proximity of fuel
29 assemblies to one another, combined with the effects of radioactive heat transfer when these
30 assemblies are at very high temperatures, could allow the runaway oxidation reaction to spread
31 from spent fuel with high decay heat to spent fuel with lower decay heat that would otherwise
32 not have begun burning.

33 A spent fuel pool accident could develop into a spent fuel pool fire in a number of ways. As the
34 NRC first determined in 1975, spent fuel pool accidents can arise from either the loss of spent
35 fuel pool cooling, drainage of the spent fuel pool, or the dropping of heavy items into the spent
36 fuel pool (NRC 1975). Since that time, the NRC has refined its analysis and has looked at
37 various ways that these events could occur. For example, in 1989 the NRC conducted a study

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1 that assessed various accident sequences including spent fuel pool failure due to wind-driven
2 missiles, aircraft crashes, heavy-load drop, seal failure, inadvertent draining, loss-of-cooling,
3 and seismic events (NRC 1989).

4 The NRC has also assessed the probability that these various events could occur. For
5 example, in its earliest study, the NRC determined that the probability of the drainage of the
6 spent fuel pool was much less than a loss-of-cooling event for the reactor because accidental
7 drainage of the spent fuel pool requires multiple simultaneous failures (NRC 1975). Further, in
8 1989 the NRC quantified the probabilities of various accident initiating events and assessed the
9 health and economic consequences of a spent fuel pool accident (NRC 1989).

10 Finally, as discussed in more detail below, the NRC confirmed that the overall risks associated
11 with these types of accidents remain low because the spent fuel pool loss-of-cooling event
12 probability is low (NRC 2001). As discussed in more detail below, since the NRC completed
13 this study in 2001, the NRC has continued to implement regulations and orders that further
14 reduce the likelihood of a spent fuel pool fire. These additional reductions in the likelihood of a
15 spent fuel pool fire mean that the risks are lower now than those NRC reported in its 2001
16 study. Further, no new information has emerged that would cause the NRC to question the
17 results of this study.

18 **F.2.1 Consequences of a Spent Fuel Pool Fire**

19 The release of radionuclides into the environment resulting from a spent fuel pool fire can lead
20 to severe consequences, both in terms of direct human health impacts (e.g., early fatalities or
21 latent cancer fatalities) and economic damages arising from the actions taken to avoid human
22 exposures (e.g., evacuation and relocation costs, costs for cleanup of contaminated land, and
23 the loss of economic value associated with land that cannot be used following a severe
24 accident). These consequences do not consider the probability that an accident will occur.
25 Possible initiating events and the probability that these events could occur are discussed in
26 Section F.2.2. The following discussion and Table F-1 examine the consequences of a spent
27 fuel pool fire.

28 In NUREG–1738 and Table F-1, source terms for high ruthenium (Ru) and low Ru are
29 expressed as ranges. For example, the total collective dose for the high Ru source term ranges
30 from 1.34×10^5 to 2.37×10^5 person-Sv.³ The ranges in Table F-1 are mean values of
31 consequences of a spent fuel pool fire in which the NRC assumed a late evacuation of
32

³ A person-sievert (person-Sv) is a unit of collective dose. Collective dose is the sum of individual radiation doses received by a population. The incidence of health effects will vary from no observable health effects in large numbers of exposed individuals that receive low doses to observable health effects in small numbers of exposed individuals that receive large doses. Population health effects from spent fuel fires, including early fatalities and latent cancer fatalities, are summarized in Table F-1.

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1 95 percent of the population inside the 16-km (10-mi) emergency planning zone around Surry
 2 Power Station (Surry). The late evacuation assumption means that evacuation is started, but
 3 not completed before the release begins. The low value corresponds to a fire that occurs
 4 10 years after shutdown, at which time radioactive decay has reduced the amount of radioactive
 5 material that could be released. The high value corresponds to a fire that occurs within 30 days
 6 after shutdown.

7 **Table F-1.** Spent Fuel Pool Accident Probability and Consequences^(a)

	Individual Risk per Event				Collective Early Fatality per Event (10 mi) ^(bc)	Latent Fatality ^(cd) (0–500 mi)	Total Onsite and Offsite Economic (million \$ per event)
	Accident Frequency (per year) ^(b)	Early Fatality (1 mi) ^(bc)	Latent Fatality (10 mi) ^(bc)	Total person-Sv per Event			
NUREG–1738 (high Ru)	5.8×10^{-7} ^(de) to 2.4×10^{-6} ^(ef)	4.68×10^{-3} to 4.43×10^{-2}	6.39×10^{-2} to 8.49×10^{-2}	1.34×10^5 to 2.37×10^5 (50 mi) ^(bc)	<1 (0.360) to 191	-	-
NUREG–1738 (low Ru)	5.8×10^{-7} ^(de) to 2.4×10^{-6} ^(ef)	1.63×10^{-3} to 1.27×10^{-2}	1.29×10^{-2} to 1.88×10^{-2}	4.72×10^4 to 5.58×10^4 (50 mi) ^(bc)	<1 to 2	20,000– 27,000	-
NUREG–1353	2.0×10^{-6}	-	-	2.6×10^5 (50 mi) ^(gf)	-	-	55,700 ^(gh,i)
NUREG/ BR–0184	-	-	-	2.6×10^5 (50 mi) ^(hj)	-	-	57,800 ^(h,k,gj)

(a) All values are approximate.

(b) A value of 5.8×10^{-7} is scientific notation for a value that can also be expressed as 0.00000058. This value means that the probability of the accident occurring in any year is one chance in 1,700,000 (or one chance in 1/0.00000058).

(c) Consequence values were obtained from NUREG–1738 (NRC 2001, Tables 2 and 3 of Appendix 4B). [Note: Similar values appear in NUREG–1738 (NRC 2001, Tables 3.7-1 and 3.7-2), but were incorrectly reporting values from Appendix 4B.]

(cd) Consequence values were obtained from NUREG–1738 (NRC 2001, Appendix 4) and reflect a range of results from the seven cases evaluated.

(de) Electric Power Research Institute data from NUREG–1738 (NRC 2001).

(ef) Lawrence Livermore National Laboratory data in NUREG–1738 (NRC 2001).

(fg) Case 2 values were obtained from NUREG–1353 (NRC 1989, Table 4.8.3). Case 2 assumed the entire spent fuel pool inventory was released.

(gh) Values adjusted to 2010 dollars using the Consumer Price Index Inflation Calculator.

(hi) Values were obtained from NUREG–1353 (30,200 Million \$ in 1988 dollars; excludes replacement power costs) (NRC 1989, Tables 5.1.1 and 5.1.2).

(hj) Values were obtained from NUREG/BR–0184 (NRC 1997, Table C.101).

(kj) Values were obtained from NUREG/BR–0184 (26,400 Million \$ in 1983 dollars; excludes replacement power costs) (NRC 1997, Table C.95 and C.101).

8 As discussed below, the assumptions described above are conservative assumptions of the
 9 consequences of the spent fuel pool fire. These conservative assumptions further reduce the
 10 likelihood that the actual consequences would be as high as indicated in Table F-1. For
 11 example, the low Ru results from the 2001 study more realistically represent the anticipated
 12 consequences of even a high-volatility Ru spent fuel pool fire sequence. The 95 percent

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1 evacuation estimate is less than the NRC’s best estimate of actual evacuation of 99.5 percent,
2 of the populace from the 16-km (10-mi) emergency planning zone, which was used by the NRC
3 in its “2012 NRC State-of-the-Art Reactor Consequence Analyses Report for Surry” (NRC 1990,
4 2012). However, in
5 NUREG–1738 the NRC used a value of 95 percent in sensitivity studies to address concerns
6 that the fraction of the public that does not evacuate could be higher. “Late evacuation” is a
7 reasonable assumption for decay times of less than about 2 years, for which the time-to-release
8 could be less than 10 hours. However, the time-to-release (following the initiating event) will be
9 longer than 10 hours after the spent fuel has cooled at least 2 years, and early evacuation, in
10 which evacuation is completed before the release begins, would be increasingly more likely as
11 the decay time increases. Early evacuation results in lower public doses because more people
12 will evacuate before release occurs. Finally, the main contributors to the likelihood of
13 uncovering the spent fuel are seismic events and cask drop. These events are no more or less
14 likely to occur in any particular time interval during continued storage. Therefore, the probability
15 of these initiating events occurring within the first 30 days after shutdown, is an order of
16 magnitude less, as compared to the per year probability during the 60-year short-term storage
17 timeframe.

18 The low Ru and high Ru values shown in Table F-1 refer to two different source terms used in
19 NUREG–1738. The low Ru source term is based on release fractions for chemical element
20 groups that are discussed in NUREG–1465, “Accident Source Terms for Light-Water Nuclear
21 Power Plants” (NRC 1995). In NUREG–1738, NRC considered whether the Ru group and fuel
22 fines component of the NUREG–1465 release fractions were too low. The fuel fines component
23 of the source term, comprised of small particles of spent fuel, is represented by the element
24 groups for cerium and lanthanum. In NUREG–1738, the NRC also analyzed a high Ru source
25 term. The high Ru source term uses the same NUREG–1465 release fractions for all chemical
26 element groups except those for Ru, lanthanum, and cerium. The higher release fraction for Ru
27 in the high Ru source term is the same fraction as those used for volatile fission products like
28 isotopes of iodine and cesium. As stated in NUREG–1738, the higher release fractions for
29 lanthanum and cerium in the high Ru source term are based on a 1995 study of the Chernobyl
30 accident.

31 As described in NUREG–1738, Ru in a steam environment has a very low vapor pressure that
32 tends to limit its release (NRC 2001). For spent fuel pool accidents involving rapid drain-down
33 of the pool, and thus primarily an air environment during fuel heat up, the volatility of Ru might
34 be much higher. Recent modeling suggests that Ru release in an air environment would in fact
35 be much higher than in a steam environment, but still several orders of magnitude below the
36 release fractions used for the high Ru release in the 2001 study (Gauntt 2010). For this reason,
37 the low Ru results from the 2001 study are more representative of the anticipated
38 consequences of even a high-volatility Ru spent fuel pool fire sequence.

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Appendix F

1 The NRC assesses the consequences of a spent fuel pool fire and other severe accidents in
2 terms of health impacts and economic damages. The health impacts from spent fuel pool fires
3 are measured through both individual impacts at select locations, and overall population
4 consequences. Health impacts include the early fatality risk to an individual within 1.6 km (1 mi)
5 of the plant and the latent fatality risk to an individual within 16 km (10 mi) of the plant. These
6 health impacts represent possible exposures and consequences to the population near a
7 nuclear facility. Early fatalities are the number of fatalities expected to occur within a few weeks
8 or months of the accident for the individuals exposed to large doses of radiation. Latent
9 fatalities are the number of fatalities that occur over the lifetime of the exposed individuals.⁴

10 Other health impacts that the NRC considers include collective dose to the public within 80 km
11 (50 mi) of the plant, and the collective latent fatalities within 800 km (500 mi) of the plant (NRC
12 2001). The collective dose is the dose received by the total population living within a specific
13 distance from the facility, including return dose and the dose to workers during decontamination
14 of contaminated land; this value depends upon the site-specific population within a specific
15 distance of the plant. In Table F-1, health effects taken from NUREG-1738 are based on a
16 postulated spent fuel pool fire at Surry. A similar case reported in NUREG-1353 and
17 NUREG/BR-0184 involved 3.5 cores of spent fuel from the R.E. Ginna nuclear power plant and
18 a 80-km (50-mi) average population density of 330 people/km² (860 people/mi²), (based on the
19 population around the Zion nuclear power plant in Illinois) (NRC 1989, 1997). In general, health
20 impacts could be higher than the values reported in these studies if the amount of spent fuel
21 involved in a fire (and, thus, the amount of radioactive material that could be released) was
22 higher than assumed in these studies or the total population and population density were higher.
23 Health impacts can also be affected by protective action guidelines, or the radiation dose levels
24 above which emergency response officials will recommend protective actions like evacuation or
25 sheltering. Higher protective action guidelines could increase public doses by allowing people
26 to remain in affected locations longer. Different types of radioactive material can also change
27 health impacts. For example, early fatalities would likely be caused by short-lived radioactive
28 material that is present in operating reactors. Once spent fuel has been removed from a reactor
29 and stored in the spent fuel pool, short-lived radioactive material will decay to such low levels
30 that accidents would result in fewer early fatalities in the surrounding population.

31 The NRC also analyzes consequences in terms of the economic consequences arising from the
32 actions taken to avoid human exposure. The economic consequences identified in Table F-1
33 take into account various costs, including offsite and onsite property damage resulting from the
34 release of radioactive material and the resulting land contamination. Offsite property damage

⁴ As discussed in the NUREG-1738, the use of the Surry site means that the accident consequences could be greater at higher population sites, but the quantitative health objectives used in NUREG-1738 for comparisons to the Commission's Safety Goals represent the risk to the average individual within 1.6 km (1 mi) and 16 km (10 mi) of the plant. That risk should be relatively insensitive to the site-specific population around a plant (NRC 2001).

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1 includes evacuation costs, relocation costs for displaced persons, property decontamination
2 costs, loss of use of contaminated property through interdiction, crop, and milk losses. The
3 onsite property damage costs include onsite cleanup and decontamination, repair of the spent
4 fuel pool, and removal of fuel. The total onsite and offsite economic damage values were
5 estimated to be between 55.7 and 57.8 billion dollars per event (NRC 1989, 1997), when
6 adjusted to 2010 dollars. As with health impacts, the economic impacts would vary for different
7 facilities. For example, higher total population or population density could result in higher
8 relocation costs, and land use (e.g., whether land is used as farmland or not) could also
9 impact decontamination and condemnation costs.

10 Although discussed in more detail in the next section, Table F-1 also includes probability and
11 consequence values for a spent fuel pool fire (NRC 1989, 1997, 2001). As shown in Table F-1,
12 the zirconium cladding fire probability in the 1989 regulatory analysis was calculated as
13 $2 \times 10^{-6}/\text{yr}$, which is almost identical to the $2.4 \times 10^{-6}/\text{yr}$ probability from the 2001 study (NRC
14 2001) that the NRC is using for this appendix.

15 **F.2.2 Probability-Weighted Consequences of a Spent Fuel Pool Fire**

16 As discussed in Section 4.18.2.1, with respect to severe (or, beyond-design-basis) accidents,
17 the consequences of a severe accident, should one occur, would be significant and
18 destabilizing. The impact determinations for these accidents, however, are made with
19 consideration of the low probability of these events. The environmental impact determination
20 with respect to severe accidents, therefore, is based on the risk, which the NRC defines as the
21 product of the probability and the consequences of an accident. This means that a high-
22 consequence, low-probability event, like a severe accident, could still result in a small impact
23 determination, if the risk is sufficiently low.

24 The NRC has considered a number of initiating events that could lead to a spent fuel pool fire.
25 These events include loss of offsite power, internal fires, loss of pool cooling, loss-of-coolant
26 inventory, seismic event, cask drop, aircraft crash, and a tornado missile (NRC 2001). These
27 initiating events are discussed in more detail below and, as supplemented by the overall
28 discussion of accidents in Section 4.18 of this draft GEIS, provide the range of credible initiating
29 events for spent fuel pool fires.

30 The main contributors to the frequency of loss-of-coolant in the pool and exposure of the spent
31 fuel to air are seismic events and cask drop (NRC 2001). As shown in Table F-1, for the
32 credible initiating events considered, the NRC has determined that the frequency of fuel being
33 uncovered could be between 5.8×10^{-7} and 2.4×10^{-6} per year depending upon the seismic
34 hazard assessment (NRC 2001). Seismic risk, in general, is discussed in more detail in
35 Section 4.18.

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1 The source term used in this draft GEIS is derived from the source term used in NUREG–1738.
 2 It includes both the final core off-load and the previous 10 refueling outage off-loads (NRC
 3 2001). The NRC estimated this to be roughly 3.5 core loads in the spent fuel pool, based on an
 4 adjusted inventory for the Millstone 1 nuclear power plant that accounted for larger reactors and
 5 the fact that NUREG–1738 was limited to spent fuel pool accidents during decommissioning
 6 (NRC 2001). In addition, the NRC considered a range of times in which the event could occur
 7 after shutdown, including 30 days, 90 days, 2 years, 5 years, and 10 years after final shutdown
 8 (NRC 2001).

9 As shown in Table F-1, the most severe spent fuel pool fire consequences would occur within
 10 30 days after a final reactor shutdown in conjunction with a late or delayed evacuation of the
 11 affected area. The late evacuation impacts results in more severe consequences than those for
 12 an early evacuation because a late evacuation means that even fewer people will have
 13 evacuated when the release of radioactive material begins. Further, the values shown in
 14 Table F-1 are conditional consequences, based on an assumption that a severe accident occurs
 15 without consideration of the remote probability of an accident. Probability-weighted
 16 consequences are shown in Table F-2 and discussed in Section F.2.2.

17 **Table F-2.** Comparison of Frequency-Weighted Consequences from Reactor Accidents and
 18 Spent Fuel Pool Fires

Accident Type	Individual Risk			Population Risk		
	Early Fatalities (within 1 mi) (Ryr ⁻¹)	Latent Fatalities (within 10 mi) (Ryr ⁻¹)	Collective Dose (person-Sv Ryr ⁻¹)	Early Fatalities (Ryr ⁻¹)	Latent Fatalities (Ryr ⁻¹)	Economic Damage (\$ Ryr ⁻¹) ^(a)
Severe Reactor Accident ^(b)	1.5×10^{-8}	1.5×10^{-9}	0.06	2.0×10^{-6}	5.2×10^{-3}	$1.1 \times 10^{5(c)}$
Spent Fuel Pool Fire ^(d)	3.3×10^{-9} to 2.5×10^{-8}	2.6×10^{-8} to 3.8×10^{-8}	0.09 to 0.11	1.6×10^{-7} to 4.4×10^{-6}	4.4×10^{-3} to $4.9 \times 10^{-3(e)}$	$1.0 \times 10^{5(f)}$ to $1.1 \times 10^{5(g)}$

(a) Values adjusted to 2010 dollars using the Consumer Price Index Inflation Calculator.

(b) From NUREG–1150 for Surry Power Station (NRC 1990), except for economic damage (see Note (c)).

(c) From NUREG–1437, Supplement 6, Surry Power Station Units 1 and 2 (NRC 2002), without public exposure costs.

(d) From NUREG–1738 (NRC 2001, Figures 3.7-3, 3.7-4, 3.7-7, and 3.7-8), except population latent fatality and economic damage risks.

(e) From NUREG–1738, (NRC 2001, Tables A4-7 through A4-9), which reflect a range of the 3 Surry cases evaluated, for distances up to 160 km (100 mi), and between 30 days and 1 year decay time prior to the accident. Event frequency is 2×10^{-6} Ryr⁻¹ (NRC 2001).

(f) NUREG/BR–0184 (NRC 1997, Tables C.95 and C.101), without replacement power costs.

(g) From NUREG–1353 (NRC 1989, Tables 4.8.3, 5.1.1, and 5.1.2), without replacement power costs.

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1 As the fuel continues to age after reactor shutdown, it will become less hazardous due to
2 radioactive decay and the reduction of the heat generated by the spent fuel. Thus, both the
3 consequences and risk predicted by the analysis will continue to decrease in comparison to the
4 values in Table F-1 through the short-term storage timeframe because the fuel would have been
5 cooling in the spent fuel pool for a longer period of time and would have a smaller source term
6 (less radionuclide inventory) due to decay.

7 In NUREG–1738, the NRC determined that the probability-weighted consequences of a spent
8 fuel pool accident, including a spent fuel pool fire, could be comparable to the probability-
9 weighted consequences of a severe reactor accident (NRC 2001).⁵ Therefore, the NRC has
10 decided to include a comparison of the frequency-weighted consequences of a severe reactor
11 accident to the frequency-weighted consequences of a spent fuel pool fire to provide a more
12 complete picture of the overall risks of a spent fuel pool fire. As discussed above, the
13 frequency-weighted consequences, or the risk, of a spent fuel pool fire represent the NRC's
14 determination of the environmental impacts of this event.

15 Table F-2 provides the probability-weighted consequences (risk) resulting from a spent fuel pool
16 fire. This table demonstrates that the probability-weighted consequences of a spent fuel pool
17 fire are comparable to those for severe reactor accidents.

18 With the exception of the economic damage risk figures for spent fuel pool fire, all of the risk
19 values in Table F-2 are for Surry. Economic damage risk figures for spent fuel pool fires are not
20 available for Surry; thus, this draft GEIS uses available economic damage risk figures that are
21 as similar as possible. A similar case studied previously by NRC involved 3.5 cores of spent
22 fuel from the R.E. Ginna nuclear power plant and a 80-km (50-mi) average population density of
23 330 people/km² (860 people/mi²), which is based on the population around the Zion plant in
24 Illinois (NRC 1989). Given that the analysis in this draft GEIS is concerned with spent fuel pool
25 fires at nuclear power plants that have permanently ceased operations, the economic damage
26 risk figures for spent fuel pool fires presented in Table F-2 do not include replacement power
27 costs. The costs considered include those for onsite cleanup, repair and disposal of wastes,
28 and offsite economic damage (e.g., relocation of people and property decontamination).

29 The NRC is using the results for Surry because there are few stations for which quantitative risk
30 values are available for both an onsite reactor accident and a spent fuel pool fire. The NRC

⁵ The seismic risk analysis performed in NUREG–1738 was based on site-specific seismic hazard estimates for nuclear power plants in the central and eastern United States found in NUREG–1488, “Revised Livermore Seismic Hazard Estimates for 69 Nuclear Power Plant Sites East of the Rocky Mountains” (NRC 1994). As such, nuclear power plants in the western United States, such as Diablo Canyon, San Onofre, and Columbia, were not specifically considered in this study. Nothing in NUREG–1738, or the NRC's reliance on it here, undermines the NRC's determination that the impacts of a severe accident in a spent fuel pool will be comparable to severe reactor accidents for all facilities.

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1 believes that a comparison of severe reactor accidents and spent fuel pool fires for Surry is
2 appropriate for this generic analysis because of the following:

- 3 • Each of the two pressurized water reactor units at Surry generate approximately the same
4 levels of thermal and electric power as the reference facility described elsewhere in this draft
5 GEIS (838 MW(e) versus the reference value of 1,000 MW(e)), and the shared Surry spent
6 fuel pool is licensed to store 1,044 spent fuel assemblies—the equivalent of about 4.6 full
7 reactor cores, or about 520 MTU—which is approximately the pool capacity used elsewhere
8 in this draft GEIS (520 MTU versus the reference value of 700 MTU). The NRC has
9 determined that the differences between the Surry and the reference facility values are not
10 significant for this impact analysis and, as noted above, the impacts can be scaled
11 appropriately for any particular facility's surrounding population and source term
12 characteristics.
- 13 • The consequences of a severe reactor accident will change in direct proportion to the
14 reactor's power level. Likewise, the consequences of a spent fuel pool fire will change in
15 direct proportion to the amount of spent fuel stored in the pool. In the case of Surry, both
16 the reactor power level and the spent fuel pool licensed capacity are both about the same
17 proportion lower than the reference facility described in Chapter 2 of the GEIS. As a result,
18 the ratio of severe reactor accident risk to spent fuel pool fire risk is likely to be similar for the
19 reference reactor described in Chapter 2.

20 The risk values in Table F-2 include individual risks and population risks. The individual risk
21 values for both severe reactor accidents and spent fuel pool fires are comparable to each other
22 and both lower than the NRC's Quantitative Health Objectives contained in its Safety Goal
23 Policy Statement (51 FR 30028) for both individual early fatality risk (5×10^{-7} Ryr⁻¹) and
24 individual latent fatality risk (2×10^{-6} Ryr⁻¹) (NRC 2001). As stated above, the population risk
25 values for the two accident types are comparable. The public exposure costs are not included
26 in the severe reactor accident economic cost-risk figures because the spent fuel pool fire
27 economic damage risk from the reports cited did not include public exposure costs.

28 This analysis shows that the probability-weighted consequences for a spent fuel pool fire, as
29 analyzed in NUREG-1738, are comparable to the probability-weighted consequences for
30 severe power reactor accidents analyzed in the 1996 and 2013 License Renewal GEIS (NRC
31 1996, 2013). Not only are spent fuel pool probability-weighted consequences comparable, but
32 NUREG-1738 contains several built-in conservative assumptions. For example, NUREG-1738
33 assumed that the zirconium fuel cladding would start to burn and was nonrecoverable as soon
34 as the water level in the spent fuel pool fell to within 0.9 m (3 ft) of the top of the fuel assemblies
35 (NRC 2001). However, a 2008 Denial of Petition for Rulemaking (73 FR 46204) analysis shows
36 that there would be significant time between the initiating event and the spent fuel assemblies
37

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1 becoming partially or completely uncovered. Thus, more time would be available for operator
2 intervention, which would lower the probability of a drain-down event leading to a spent fuel
3 pool fire.

4 In addition, NUREG–1738 concluded that it would take more than 4 days for a pressurized
5 water reactor and more than 6 days for a boiling water reactor (assuming a 60 day decay time
6 for the fuel) for the water to reach within 0.9 m (3 ft) of the top of the fuel assemblies due to
7 heating, boiling, and evaporation of the spent fuel pool water. However, if a 2 year decay time
8 for the spent nuclear fuel were assumed, then the time for the water to reach within 0.9 m (3 ft)
9 of the top of the fuel assemblies would be more than 11 days for a pressurized water reactor
10 and more than 14 days for a boiling water reactor. Based on significant time between the
11 initiating event and the spent fuel assemblies becoming partially or completely uncovered the
12 licensees and State and Federal authorities would have time to take mitigating action to prevent
13 a spent fuel pool fire. In addition, air-cooling of spent fuel would be sufficient to prevent spent
14 fuel pool zirconium fires at a point much earlier following fuel offload from the reactor than was
15 considered in the 2001 study (73 FR 46204).

16 Since the publication of NUREG–1738, the NRC has required licensees to undertake additional
17 actions to further reduce the probability of a spent fuel pool fire. These additional actions
18 resulted from insights following the September 11, 2001 terrorist attack and the March 11, 2011
19 Fukushima Dai-ichi accident.

20 Following the September 11, 2001 attack, the NRC took several actions to further reduce the
21 probability of a spent fuel pool fire. In the wake of the attacks, the NRC issued orders to
22 licensees that implemented additional security measures, including increased patrols,
23 augmented security forces and capabilities, and more restrictive site-access controls to reduce
24 the likelihood of an accident, including a spent fuel pool accident, resulting from a terrorist-
25 initiated event. In addition, the NRC amended Title 10 of the *Code of Federal Regulations*
26 50.54(hh)(2) to require licensees to implement other mitigating measures to maintain or restore
27 spent fuel pool cooling capability in the event of loss of large areas of the plant due to fires or
28 explosions, which further decreases the probability of a spent fuel pool fire (58 FR 13926).
29 Further, other organizations, such as Sandia National Laboratory, have confirmed the
30 effectiveness of the additional mitigation strategies to maintain spent fuel cooling in the event
31 the pool is drained and its initial water inventory is reduced or lost entirely (73 FR 46204).
32 Generic strategies for spent fuel pool cooling are further discussed in a publication prepared by
33 the Nuclear Energy Institute, a nuclear industry policy group, in NEI–06–12, Revision 2 (NEI
34 2006), which has been endorsed by the NRC. As a result of these additional actions, NRC has
35 concluded that the probability of an initiating event leading to a spent fuel pool fire is less likely
36 than analyzed in the NUREG–1738 and previous studies (73 FR 46204). As a result, the
37 analysis provided in Table F-2, based upon NUREG–1738, is a conservative estimate of spent
38 fuel pool risk.

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1 The NRC conducted additional evaluations to assess its regulatory framework in response to
2 the March 2011 Fukushima Dai-ichi events. On March 11, 2011, a massive earthquake off the
3 east coast of Honshu, Japan, produced a devastating tsunami that struck the coastal town of
4 Fukushima. The six-unit Fukushima Dai-ichi nuclear power plant was most directly affected by
5 these events. Damage to the systems and structures of the reactor building resulted in the
6 release of radioactive material to the surrounding environment. While this accident led to a
7 substantial release of radioactive material, the fuel stored in the spent fuel pools was not
8 uncovered and the event did not lead to a spent fuel pool fire. Information on the event
9 indicates that spent fuel pool cooling was lost for all spent fuel pools following the loss of offsite
10 power (INPO 2011). But subsequent analyses and inspections confirmed that the spent fuel
11 pool water levels did not drop below the top of the fuel in any of the spent fuel pools and no
12 significant damage occurred to the fuel in the pools. These events demonstrate that, even
13 without spent fuel cooling for multiple days, the pools were able to maintain cooling
14 (INPO 2012).

15 In response to the earthquake, tsunami, and resulting reactor accidents at Fukushima Dai-ichi,
16 the Commission directed the staff to convene an agency task force of senior leaders and
17 experts to conduct a methodical and systematic review of the relevant NRC regulatory
18 requirements, programs, and processes, including their implementation, and to recommend
19 whether the agency should make near-term improvements to its regulatory system. As part of
20 the short-term review, this Near-Term Task Force concluded that some additional improvements
21 to spent fuel pool storage and other structures, systems, and components would be beneficial.
22 In NRC Order EA-12-049, the NRC required licensees to implement mitigating strategies to
23 ensure that spent fuel pool cooling can be accomplished through alternative means to prevent
24 fuel damage (NRC 2012a). In addition, in NRC Order EA-12-051, the NRC determined that
25 commercial power reactor licensees must have a reliable means to remotely monitor a wide-
26 range of spent fuel pool levels to support effective prioritization of event mitigation and recovery
27 actions in the event of a beyond-design-basis external event (NRC 2012b). These measures
28 further reduce the probability of a spent fuel pool fire, and thus further increase the
29 conservatism of NUREG-1738.

30 **F.2.3 Conclusion**

31 In summary, the conservative estimates that the NRC is using to assess spent fuel pool fire
32 accidents, based upon NUREG-1738 and other analyses, results in probability-weighted
33 population doses and economic consequences that are comparable to the values calculated for
34 a reactor accident, as estimated in the 1996 and 2013 License Renewal GEIS (NRC 1996,
35 2013). Further, mitigation measures implemented by licensees as a result of NRC orders and
36 regulations adopted since NUREG-1738 have further lowered the probability and risk of a spent
37 fuel pool fire. As a result, the NRC finds that the environmental impacts from spent fuel pool
38 fires are SMALL during the short-term storage timeframe.

1 **F.3 References**

2 **F.3.1 Summary of Major Studies Considered in this Appendix**

3 One of the earlier spent fuel pool accident studies considered by the NRC was “Reactor Safety
4 Study: An Assessment of Accident Risks in U.S. Commercial Nuclear Power Plants” (NRC
5 1975). The Reactor Safety Study provides a systematic quantification of commercial nuclear
6 reactor accident probabilities. Appendix I of the Reactor Safety Study covers various accidents,
7 including spent fuel storage pool accidents. The Reactor Safety Study states that spent fuel
8 pool accidents can arise from either loss of spent fuel pool cooling, drainage of the spent fuel
9 pool, or dropping of heavy items into the spent fuel pool. The Reactor Safety Study also
10 indicates that the probability of spent fuel damage from a spent fuel pool loss-of-cooling event is
11 small at less than 0.1 events per year. The Reactor Safety Study used this information to
12 estimate the probability of fuel damage due to loss of pool cooling. This study examined
13 drainage of the spent fuel pool and concluded that the probability of drainage is much lower
14 than for a loss-of-cooling event because drainage would require multiple failures to occur
15 simultaneously. In addition to loss-of-cooling accidents, the Reactor Safety Study examined
16 mechanical failure, both for dropping a cask into the spent fuel pool or due to an earthquake.
17 This study concluded that the risks for a spent fuel pool accident were orders of magnitude
18 below those involving the reactor core because of the robust design of the spent fuel pool.

19 In 1989, NRC completed a generic analysis of potential accidents in spent fuel pools,
20 “Regulatory Analysis for the Resolution of Generic Issue 82, ‘Beyond Design Basis Accidents in
21 Spent Fuel Pools’” (NRC 1989). This analysis reexamined spent fuel pool fires because
22 1) spent fuel pool storage had been expanded, including use of high-density storage racks and
23 2) new research had provided evidence of the possibility of fire propagation between
24 assemblies in an air-cooled environment. This generic analysis examined the various spent fuel
25 pool and spent fuel storage rack designs. NRC used this information to assess various accident
26 sequences, including failure due to missiles, aircraft crashes, heavy-load drop, seal failure,
27 inadvertent draining, loss-of-cooling, and seismic events. NRC quantified the probabilities of
28 these initiation events and assessed both the health and economic consequences.

29 The safety and environmental effects of spent fuel pool storage were further addressed in
30 conjunction with regulatory assessments of permanently shutdown nuclear plants and
31 decommissioning nuclear power plants. NUREG/CR–6451, “A Safety and Regulatory
32 Assessment of Generic BWR and PWR Permanently Shutdown Nuclear Power Plants” (Travis
33 et al. 1997), addressed the appropriateness of regulations (e.g., requirements for emergency
34 planning and insurance) associated with spent fuel pool storage. The study also provided
35 bounding estimates for offsite consequences for the most severe accidents, which would involve
36 draining of the spent fuel pool (e.g., complete draining of the spent fuel pool occurs 12 days
37 after shutdown of the reactor).

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1 In 2001, NRC published the results of its technical study on spent fuel pool accident risk at
2 decommissioning nuclear power plants. This study, NUREG–1738, “Technical Study of Spent
3 Nuclear Fuel Pool Accident Risk at Decommissioning Nuclear Power Plants,” also examined
4 spent fuel pool zirconium fires (NRC 2001). The NRC’s analyses showed that, although the
5 consequences for a spent fuel pool fire could be high, the risk (probability-weighted
6 consequence) would be low because the loss-of-coolant event frequency is low. The NRC’s
7 analysis was based on a spent fuel pool at a decommissioning nuclear power plant, but
8 included times shortly after plant shutdown. Therefore, the study included analysis of accident
9 conditions for spent fuel that had various amounts of decay heat. The risk analyses included
10 sensitivity studies to evaluate scenarios in which members of the public residing near the plant
11 did not evacuate as promptly as expected, given emergency preparedness requirements. This
12 analysis assumed a spent fuel pool inventory equivalent to 3.5 reactor cores, a much more
13 densely packed pool than assumed by the 1975 Reactor Safety Study. Further, NUREG–1738
14 included core loads with an average fuel burnup of 60 gigawatt-days/metric ton uranium, which
15 is consistent with high-burnup fuel. This study represents the NRC’s current judgment as to the
16 expected impacts from a spent fuel pool fire during the short-term storage timeframe.

17 **F.3.2 List of References**

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Appendix G

Spent Fuel Storage Facilities

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Appendix G

Spent Fuel Storage Facilities

1 This appendix provides summary information concerning spent nuclear fuel (spent fuel) pools
2 and independent spent fuel storage installations (ISFSIs) located at operating commercial
3 power reactors and decommissioned reactor sites.

4 Table G-1 through Table G-3 provide information about spent fuel pools. Specifically, Table G-1
5 lists operating reactors and the capacities of their spent fuel pools. Capacities at single-unit
6 pressurized water reactor (PWR) power plants range from 544 assemblies at the H.B. Robinson
7 Steam Electric Plant, Unit 2 to 2,363 assemblies at the Callaway Plant and the Wolf Creek
8 Generating Station. At boiling water reactor (BWR) power plants, spent fuel pool capacities
9 range from 1,803 assemblies at the Brunswick Steam Electric Generating plant to 4,608
10 assemblies at Fermi, Unit 2.

11 Table G-2 indicates the capacity of spent fuel pools for newly licensed power reactors, namely
12 Vogtle Units 3 and 4 and Virgil C. Summer Units 2 and 3. The capacity of each of the four pools
13 is 889 assemblies. Table G-3 provides the capacity of spent fuel pools for decommissioning
14 reactors. Presently, only three decommissioning reactors at two sites have spent fuel stored in
15 pools. These are Millstone Unit 1 (pool capacity of 2,959 assemblies) and Zion Station Units 2
16 and 3 (shared pool capacity of 3,012 assemblies).

17 Table G-4 and Table G-5 provide information about the ISFSIs with general and specific
18 licenses under Title 10 of the *Code of Federal Regulations* (CFR) Part 72, respectively. The
19 ISFSIs are located at operating and decommissioning reactor sites. There are 54 generally
20 licensed ISFSIs and 15 specifically licensed ISFSIs. Two of the specifically licensed ISFSIs
21 (i.e., Private Fuel Storage and the Idaho Spent Fuel Facility) were never constructed. All ISFSIs
22 are dry storage facilities except for the facility at the General Electric-Hitachi Morris Operation
23 Facility (GEH Morris) site, which is a wet storage facility.

24
25 A general license authorizes a nuclear power plant licensee to store spent fuel in the
26 U.S. Nuclear Regulatory Commission- (NRC)-approved casks at a site licensed to operate a
27 power reactor under 10 CFR Part 50. An NRC-approved cask is one that has undergone a
28 technical review of its safety aspects and has been found to be adequate to store spent fuel at a
29 site that meets all of the NRC's requirements in 10 CFR Part 72. A licensee is required to
30 perform an evaluation of its site to demonstrate that the site is adequate for storing spent fuel in
31 dry casks. This evaluation must show that the cask Certificate of Compliance conditions and
32 technical specifications can be met and must include an analysis of earthquake events and

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1 tornado missiles. In addition, the licensee must review its security program, emergency plan,
2 quality assurance program, training program, and radiation protection program, and make any
3 changes necessary to incorporate the ISFSI at the reactor site. Requirements for the general
4 license are described in Subpart K of 10 CFR Part 72.

5 Under a site-specific license, an applicant submits a license application to NRC. The NRC
6 performs a technical review of all the safety aspects of the proposed ISFSI and an
7 environmental review in compliance with the National Environmental Policy Act. If the
8 application is approved, the NRC issues a license that is valid for up to 40 years. A spent fuel
9 storage license contains technical requirements and operating conditions (i.e., fuel
10 specifications, cask leak testing, surveillance, and other requirements) for the ISFSI and
11 specifies what the licensee is authorized to store at the site. Requirements for the site-specific
12 license are described in Subparts A through I of 10 CFR Part 72.

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Table G-1. Capacity of Spent Fuel Pools for Operating Nuclear Power Reactors

Operating Reactors	Reactor Type	Core Size (assemblies)	Commercial Operation Start Date	Pool Capacity (assemblies)	Pool Capacity ^(a) (cores)	Estimated Pool Capacity ^(b) (MTU)
Arkansas Nuclear One, Unit 1	PWR	177	12/19/1974	968	4.5	484.0
Arkansas Nuclear One, Unit 2	PWR	177	3/26/1980	988	4.6	494.0
Beaver Valley Power Station, Unit 1	PWR	157	10/1/1976	1,627	9.4	813.5
Beaver Valley Power Station, Unit 2	PWR	157	11/17/1987	1,690	9.8	845.0
Braidwood Station, Unit 1	PWR	193	7/29/1988	2,984	13.5	1,492.0
Braidwood Station, Unit 2	PWR	193	10/17/1988	See above (pool shared with Unit 1)		
Browns Ferry Nuclear Plant, Unit 1	BWR	764	8/1/1974	3,471	3.5	645.6
Browns Ferry Nuclear Plant, Unit 2	BWR	764	3/1/1975	3,471	3.5	645.6
Browns Ferry Nuclear Plant, Unit 3	BWR	764	3/1/1977	3,471	3.5	645.6
Brunswick Steam Electric Plant, Unit 1 ^(c,f)	BWR	560	3/18/1977	1,803	2.2	335.4
Brunswick Steam Electric Plant, Unit 2 ^(d,f)	BWR	560	11/3/1975	1,839	2.3	342.1
Byron Station, Unit 1	PWR	193	9/16/1985	2,984	13.5	1,492.0
Byron Station, Unit 2	PWR	193	8/2/1987	See above (pool shared with Unit 1)		
Callaway Plant	PWR	193	12/19/1984	2,363	11.2	1,181.5
Calvert Cliffs Nuclear Power Plant, Unit 1	PWR	217	5/8/1975	1,830	6.4	915.0
Calvert Cliffs Nuclear Power Plant, Unit 2	PWR	217	4/1/1977	See above (pool shared with Unit 1)		
Catawba Nuclear Station, Unit 1	PWR	193	6/29/1985	1,421	6.4	710.5
Catawba Nuclear Station, Unit 2	PWR	193	8/19/1986	1,421	6.4	710.5
Clinton Power Station, Unit 1	BWR	624	11/24/1987	3,796	5.1	706.1
Columbia Generating Station, Unit 2	BWR	764	12/13/1984	2,658	2.5	494.4
Comanche Peak Steam Electric Station, Unit 1	PWR	193	8/13/1990	3,373	15.5	1,686.5
Comanche Peak Steam Electric Station, Unit 2	PWR	193	8/3/1993	See above (pool shared with Unit 1)		

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Table G-1. Capacity of Spent Fuel Pools for Operating Nuclear Power Reactors (cont'd)

Operating Reactors	Reactor Type	Core Size (assemblies)	Commercial Operation Start Date	Pool Capacity (assemblies)	Pool Capacity ^(a) (cores)	Estimated Pool Capacity ^(b) (MTU)
Cooper Nuclear Station	BWR	548	7/1/1974	2,651	3.8	493.1
Crystal River Nuclear Generating Plant, Unit 3 ^(e)	PWR	177	3/13/1977	1,474	7.3	737.0
Davis-Besse Nuclear Power Station, Unit 1	PWR	177	7/31/1978	1,624	8.2	812.0
Diablo Canyon Nuclear Power Plant, Unit 1	PWR	193	5/7/1985	1,324	5.9	662.0
Diablo Canyon Nuclear Power Plant, Unit 2	PWR	193	3/13/1986	1,324	5.9	662.0
Donald C. Cook Nuclear Power Plant, Unit 1	PWR	193	8/28/1975	3,613	16.7	1,806.5
Donald C. Cook Nuclear Power Plant, Unit 2	PWR	193	7/1/1978	See above (pool shared with Unit 1)		
Dresden Nuclear Power Station, Unit 2	BWR	724	6/9/1970	3,537	3.9	657.9
Dresden Nuclear Power Station, Unit 3	BWR	724	11/16/1971	3,537	3.9	657.9
Duane Arnold Energy Center	BWR	368	2/1/1975	3,152	7.6	586.3
Edwin I. Hatch Nuclear Plant, Unit 1	BWR	560	12/31/1975	3,349	5.0	622.9
Edwin I. Hatch Nuclear Plant, Unit 2	BWR	560	9/5/1979	2,933	4.2	545.5
Fermi, Unit 2	BWR	764	1/23/1988	4,608	5.0	857.1
Fort Calhoun Station, Unit 1	PWR	133	9/26/1973	1,083	7.1	541.5
Grand Gulf Nuclear Station, Unit 1	BWR	800	7/1/1985	4,348	4.4	808.7
H. B. Robinson Steam Electric Plant, Unit 2 ^(f)	PWR	157	3/7/1971	544	2.5	272.0
Hope Creek Generating Station, Unit 1	BWR	764	12/20/1986	4,006	4.2	745.1
Indian Point Nuclear Generating, Unit 2	PWR	193	8/1/1974	1,374	6.1	687.0
Indian Point Nuclear Generating, Unit 3	PWR	193	8/30/1976	1,345	6.0	672.5
James A. FitzPatrick Nuclear Power Plant	BWR	560	7/28/1975	3,239	4.8	602.5
Joseph M. Farley Nuclear Plant, Unit 1	PWR	157	12/1/1977	1,407	8.0	703.5
Joseph M. Farley Nuclear Plant, Unit 2	PWR	157	7/30/1981	1,407	8.0	703.5
Kewaunee Power Station ^(g)	PWR	121	6/16/1974	1,205	9.0	602.5
LaSalle County Station, Unit 1	BWR	764	1/1/1984	3,986	4.2	741.4
LaSalle County Station, Unit 2	BWR	764	10/19/1984	4,078	4.3	758.5
Limerick Generating Station, Unit 1w	BWR	764	2/1/1986	4,117	4.4	765.8

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Table G-1. Capacity of Spent Fuel Pools for Operating Nuclear Power Reactors (cont'd)

Operating Reactors	Reactor Type	Core Size (assemblies)	Commercial Operation Start Date	Pool Capacity (assemblies)	Pool Capacity ^(a) (cores)	Estimated Pool Capacity ^(b) (MTU)
Limerick Generating Station, Unit 2	BWR	764	1/8/1990	4,117	4.4	765.8
McGuire Nuclear Station, Unit 1	PWR	193	12/1/1981	1,463	6.6	731.5
McGuire Nuclear Station, Unit 2	PWR	193	3/1/1984	1,463	6.6	731.5
Millstone Power Station, Unit 2	PWR	217	12/26/1975	1,346	5.2	673.0
Millstone Power Station, Unit 3	PWR	193	4/23/1986	1,860	8.6	930.0
Monticello Nuclear Generating Plant, Unit 1	BWR	484	6/30/1971	2,301	3.8	428.0
Nine Mile Point Nuclear Station, Unit 1	BWR	532	12/1/1969	4,086	6.7	760.0
Nine Mile Point Nuclear Station, Unit 2	BWR	764	3/11/1988	4,049	4.3	753.1
North Anna Power Station, Unit 1	PWR	157	6/6/1978	1,737	9.1	868.5
North Anna Power Station, Unit 2	PWR	157	12/14/1980	See above (pool shared with Unit 1)		
Oconee Nuclear Station, Unit 1	PWR	177	7/15/1973	1,312	5.4	656.0
Oconee Nuclear Station, Unit 2	PWR	177	9/9/1974	See above (pool shared with Unit 1)		
Oconee Nuclear Station, Unit 3	PWR	177	12/16/1974	825	3.7	412.5
Oyster Creek Nuclear Generating Station, Unit 1	BWR	560	12/1/1969	3,035	4.4	564.5
Palisades Nuclear Plant	PWR	204	12/31/1971	892	3.4	446.0
Palo Verde Nuclear Generating Station, Unit 1	PWR	241	1/28/1986	1,329	4.5	664.5
Palo Verde Nuclear Generating Station, Unit 2	PWR	241	9/19/1986	1,329	4.5	664.5
Palo Verde Nuclear Generating Station, Unit 3	PWR	241	1/8/1988	1,329	4.5	664.5
Peach Bottom Atomic Power Station, Unit 2	BWR	764	7/5/1974	3,819	4.0	710.3
Peach Bottom Atomic Power Station, Unit 3	BWR	764	12/23/1974	3,819	4.0	710.3
Perry Nuclear Power Plant, Unit 1	BWR	748	11/18/1987	4,020	4.4	747.7
Pilgrim Nuclear Power Station	BWR	580	12/1/1972	3,859	5.7	717.8
Point Beach Nuclear Plant, Unit 1	PWR	121	12/21/1970	1,502	10.4	751.0
Point Beach Nuclear Plant, Unit 2	PWR	121	10/1/1972	See above (pool shared with Unit 1)		
Prairie Island Nuclear Generating Plant, Unit 1	PWR	121	12/16/1973	1,386	9.5	693.0
Prairie Island Nuclear Generating Plant, Unit 2	PWR	121	12/21/1974	See above (pool shared with Unit 1)		
Quad Cities Nuclear Power Station, Unit 1	BWR	724	2/18/1973	3,657	4.1	680.2

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Table G-1. Capacity of Spent Fuel Pools for Operating Nuclear Power Reactors (cont'd)

Operating Reactors	Reactor Type	Core Size (assemblies)	Commercial Operation Start Date	Pool Capacity (assemblies)	Pool Capacity ^(a) (cores)	Estimated Pool Capacity ^(b) (MTU)
Quad Cities Nuclear Power Station, Unit 2	BWR	724	3/10/1973	3,897	4.4	724.8
River Bend Station, Unit 1	BWR	624	6/16/1986	3,104	4.0	577.3
R.E. Ginna Nuclear Power Plant	PWR	121	7/1/1970	1,321	9.9	660.5
St. Lucie Plant, Unit 1	PWR	217	12/21/1976	1,706	6.9	853.0
St. Lucie Plant, Unit 2	PWR	217	8/8/1983	1,716	6.9	858.0
Salem Nuclear Generating Station, Unit 1	PWR	193	6/30/1977	1,632	7.5	816.0
Salem Nuclear Generating Station, Unit 2	PWR	193	10/13/1981	1,632	7.5	816.0
San Onofre Nuclear Generating Station, Unit 2	PWR	217	8/8/1983	1,542	6.1	771.0
San Onofre Nuclear Generating Station, Unit 3	PWR	217	4/1/1984	1,542	6.1	771.0
Seabrook Station, Unit 1	PWR	193	8/19/1990	1,236	5.4	618.0
Sequoyah Nuclear Plant, Unit 1	PWR	193	7/1/1981	2,091	9.8	1,045.5
Sequoyah Nuclear Plant, Unit 2	PWR	193	6/1/1982	2,091	9.8	1,045.5
Shearon Harris Nuclear Power Plant, Unit 1 ^(h)	PWR	157	5/2/1987	1,128	6.2	564.0
South Texas Project, Unit 1	PWR	193	8/25/1988	1,969	9.2	984.5
South Texas Project, Unit 2	PWR	193	6/19/1989	1,969	9.2	984.5
Surry Nuclear Power Station, Unit 1	PWR	157	12/22/1972	1,044	4.6	522.0
Surry Nuclear Power Station, Unit 2	PWR	157	5/1/1973	See above (pool shared with Unit 1)		
Susquehanna Steam Electric Station, Unit 1	BWR	764	6/8/1983	2,840	2.7	528.2
Susquehanna Steam Electric Station, Unit 2	BWR	764	2/12/1985	2,840	2.7	528.2
Three Mile Island Nuclear Station, Unit 1	PWR	177	9/2/1974	1,062	5.0	531.0
Turkey Point Nuclear Generating, Unit 3	PWR	157	12/14/1972	1,535	8.8	767.5
Turkey Point Nuclear Generating, Unit 4	PWR	157	9/7/1973	1,535	8.8	767.5
Vermont Yankee Nuclear Power Plant, Unit 1	BWR	368	11/30/1972	3,353	8.1	623.7
Virgil C. Summer Nuclear Station, Unit 1	PWR	157	1/1/1984	1,712	9.9	856.0
Vogtle Electric Generating Plant, Unit 1	PWR	193	6/1/1987	1,476	6.6	738.0
Vogtle Electric Generating Plant, Unit 2	PWR	193	5/20/1989	2,098	9.9	1,049.0

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Table G-1. Capacity of Spent Fuel Pools for Operating Nuclear Power Reactors (cont'd)

Operating Reactors	Reactor Type	Core Size (assemblies)	Commercial Operation Start Date	Pool Capacity (assemblies)	Pool Capacity^(a) (cores)	Estimated Pool Capacity^(b) (MTU)
Waterford Steam Electric Station, Unit 3	PWR	217	9/24/1985	1,849	7.5	924.5
Watts Bar Nuclear Plant, Unit 1	PWR	193	5/27/1996	1,386	6.2	693.0
Wolf Creek Generating Station, Unit 1	PWR	193	9/3/1985	2,363	11.2	1,181.5

Sources: Reactor operating licenses, available through the NRC's website at <http://www.nrc.gov/reactors/operating/list-power-reactor-units.html> (NRC 2013a).

- (a) Represents capacity with full core offload maintained; pool capacity (cores) is derived by subtracting one core's worth of assemblies from Pool capacity (assemblies) and then dividing that number by core size (assemblies).
- (b) Pool capacity (MTU) is derived by multiplying 500 kg (or 0.5 metric ton) per assembly for a PWR or 186 kg (0.186 metric ton) per assembly for a BWR by the number of assemblies in pool capacity.
- (c) Plus 160 PWR assemblies.
- (d) Plus 144 PWR assemblies.
- (e) Duke Energy has certified that Crystal River Unit 3 power operations have ceased and the fuel has been removed from the reactor (Duke 2013).
- (f) Brunswick and Robinson shipped to Shearon Harris.
- (g) Dominion Energy Kewaunee has certified that power operations will permanently cease on May 7, 2013 (Dominion 2013).
- (h) Plus 363 + 2178 BWR assemblies from Brunswick.

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Table G-2. Capacity of Spent Fuel Pools for Newly Licensed Power Reactors

Operating Reactors	Reactor Type	Core Size (assemblies)	Commercial Operation Start Date	Pool Capacity (assemblies)	Pool Capacity ^(a) (cores)	Estimated Pool Capacity ^(b) (MTU)
Vogtle Electric Generating Plant, Unit 3	PWR	157	future	889	4.7	444.5
Vogtle Electric Generating Plant, Unit 4	PWR	157	future	889	4.7	444.5
Virgil C. Summer Nuclear Station, Unit 2	PWR	157	future	889	4.7	444.5
Virgil C. Summer Nuclear Station, Unit 3	PWR	157	future	889	4.7	444.5

Sources: Combined operating licenses, available through the NRC's website at <http://www.nrc.gov/reactors/new-reactors/col/vogtle.html> (Vogtle) and <http://www.nrc.gov/reactors/new-reactors/col/summer.html> (Summer) (NRC 2013b).

(a) Represents capacity with full core offload maintained; pool capacity (cores) is derived by subtracting one core's worth of assemblies from pool capacity (assemblies) and then dividing that number by core size (assemblies).

(b) Pool capacity (MTU) is derived by multiplying 500 kg (or 0.5 metric ton) per assembly (assumed for PWR) by the number of assemblies in pool capacity (889).

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Table G-3. Capacity of In-Use Spent Fuel Pools for Decommissioning Facilities

Operating Reactors	Reactor Type	Core Size (assemblies)	Commercial Operation Start Date	Pool Capacity (assemblies)	Pool Capacity ^(a) (cores)	Est. Pool Capacity ^(b) (MTU)
Millstone 1	BWR	580	12/28/1970	2959	4.1	550.4
Zion 1	PWR	193	10/19/1973	3012	14.6	1506.0
Zion 2	PWR	193	11/14/1973	See above (pool shared with Unit 1)		

Sources: <http://www.nrc.gov/info-finder/decommissioning/power-reactor/millstone-unit-1.html> (NRC 2013c); Dominion 2011 (for Millstone); Commonwealth Edison 1993, 1998 (for Zion).

(a) Represents capacity with full core offload maintained; pool capacity (cores) is derived by subtracting one core's worth of assemblies from pool capacity (assemblies) and then dividing that number by core size (assemblies).

(b) Pool capacity (MTU) is derived by multiplying 500 kg (or 0.5 metric ton) per assembly for a PWR or 186 kg (0.186 metric ton) per assembly for a BWR by the number of assemblies in pool capacity.

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Table G-4. ISFSIs with General Licenses under Part 72

Reactor Site	Reactor Type	Initial Storage Date	Vendor	System Design
Arkansas Nuclear One	PWR	12/17/1996	BNG Fuel Solutions	VSC-24
Arkansas Nuclear One	PWR	12/17/1996	Holtec International	HI-STORM
Big Rock Point	BWR	11/18/2002	BNG Fuel Solutions	W-150
Braidwood	PWR	11/23/2011	Holtec International	HI-STORM 100
Brunswick ^(a)	BWR	10/28/2010	Transnuclear, Inc.	NUHOMS
Browns Ferry	BWR	8/21/2005	Holtec International	HI-STORM 100S
Byron	PWR	9/9/2010	Holtec International	HI-STORM 100
Catawba	PWR	7/30/2007	NAC International, Inc.	NAC-UMS
Columbia Generating Station	BWR	9/2/2002	Holtec International	HI-STORM 100
Comanche Peak	PWR	2/28/2012	Holtec International	HI-STORM 100
Cook	PWR	8/1/2012	Holtec International	HI-STORM 100S
Cooper	BWR	10/21/2010	Transnuclear, Inc.	NUHOMS
Davis-Besse	PWR	1/1/1996	Transnuclear, Inc.	NUHOMS
Dresden	BWR	7/10/2000	Holtec International	HI-STAR 100
Dresden	BWR	7/10/2000	Holtec International	HI-STORM 100
Duane Arnold	BWR	9/1/2003	Transnuclear, Inc.	NUHOMS
Fort Calhoun	PWR	7/29/2006	Transnuclear, Inc.	NUHOMS
Ginna ^(a)	PWR	8/23/2010	Transnuclear, Inc.	NUHOMS
Grand Gulf	BWR	11/18/2006	Holtec International	HI-STORM 100S
Haddam Neck		5/21/2004	NAC International, Inc.	NAC-MPC
Hatch	BWR	7/6/2000	Holtec International	HI-STAR 100
Hatch	BWR	7/6/2000	Holtec International	HI-STORM 100
H.B. Robinson	PWR	9/6/2005	Transnuclear, Inc.	NUHOMS
Hope Creek	BWR	11/10/2006	Holtec International	HI-STORM 100
Indian Point	PWR	1/11/2008	Holtec International	HI-STORM 100
James A. FitzPatrick	BWR	4/25/2002	Holtec International	HI-STORM 100
Joseph M. Farley	PWR	8/25/2005	Holtec International.	HI-STORM 100
Kewaunee	PWR	9/11/2009	Transnuclear, Inc.	NUHOMS
La Crosse ^(a)	BWR	7/12/2012	NAC International, Inc.	NAC-MPC

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Table G-4. ISFSIs with General Licenses under Part 72 (cont'd)

Reactor Site	Reactor Type	Initial Storage Date	Vendor	System Design
LaSalle	BWR	11/1/2010	Holtec International	HI-STORM 100
Limerick	BWR	8/1/2008	Transnuclear, Inc.	NUHOMS
Maine Yankee	PWR	8/24/2002	NAC International, Inc.	NAC-UMS
McGuire	PWR	2/1/2001	Transnuclear, Inc.	NAC-UMS
McGuire	PWR	2/1/2001	Transnuclear, Inc.	TN Metal Casks
Millstone	PWR	2/15/2005	Transnuclear, Inc.	NUHOMS
Monticello	BWR	9/17/2008	Transnuclear, Inc.	NUHOMS
Nine Mile Point	BWR	9/8/2012	Transnuclear, Inc.	NUHOMS
North Anna	PWR	3/10/2008	Transnuclear, Inc.	TN Metal Casks
Oconee	PWR	3/5/1999	Transnuclear, Inc.	NUHOMS
Oyster Creek	BWR	4/11/2002	Transnuclear, Inc.	NUHOMS
Palisades	PWR	5/11/1993	BNG Fuel Solutions	VSC-24
Palisades	PWR	5/11/1993	Transnuclear, Inc.	NUHOMS
Palo Verde	PWR	3/15/2003	NAC International, Inc.	NAC-UMS
Peach Bottom	BWR	6/12/2000	Transnuclear, Inc.	TN Metal Casks
Perry ^(a)	BWR	9/29/2012	Holtec International	HI-STORM 100S
Point Beach	PWR	5/26/1996	BNG Fuel Solutions	VSC-24
Point Beach	PWR	5/26/1996	Transnuclear, Inc.	NUHOMS
Quad Cities	BWR	12/2/2005	Holtec International	HI-STORM 100S
River Bend	BWR	12/29/2005	Holtec International	HI-STORM 100S
St. Lucie	PWR	3/14/2008	Transnuclear, Inc.	NUHOMS-HD
Salem	PWR	11/10/2006	Holtec International	HI-STORM 100
San Onofre	PWR	10/3/2003	Transnuclear, Inc.	NUHOMS
Seabrook	PWR	8/7/2008	Transnuclear, Inc.	NUHOMS-HD
Sequoyah	PWR	7/13/2004	Holtec International	HI-STORM 10
Surry	PWR	8/6/2007	Transnuclear, Inc.	NUHOMS-HD
Susquehanna	BWR	10/18/1999	Transnuclear, Inc.	NUHOMS
Susquehanna	BWR	10/18/1999	Transnuclear, Inc.	NUHOMS
Turkey Point ISFSI	PWR	7/29/2010	Transnuclear, Inc.	NUHOMS-HD

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Table G-4. ISFSIs with General Licenses under Part 72 (cont'd)

Reactor Site	Reactor Type	Initial Storage Date	Vendor	System Design
Vermont Yankee	BWR	5/25/2008	Transnuclear, Inc.	HI-STORM 100
Waterford Steam Electric Station	PWR	11/8/2011	Holtec International	HI-STORM 100
Yankee Rowe	PWR	6/26/2002	NAC International, Inc.	NAC-MPC

Sources: NRC 2012; Ux Consulting 2013

(a) Initial storage dates for Brunswick, Ginna, La Crosse, and Perry obtained from licensee letters: see FirstEnergy 2012 (for Perry); Ginna 2010 (for Ginna); Dairyland 2012 (for La Crosse); and Progress Energy 2010 (for Brunswick).

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Table G-5. ISFSIs with Specific Licenses under Part 72

Reactor	Reactor Type	Specific License No.	Initial License Start Date	Initial License Expiration Date	Renewed License Expiration Date	Vendor	System Design
Calvert Cliffs	PWR	SNM-2505	11/25/1992	2012	2052	Transnuclear, Inc.	NUHOMS
Diablo Canyon	PWR	SNM-2511	3/22/2004	2024	NA	Holtec International	HI-STORM 100
Fort St. Vrain	HTGR	SNM-2504	11/4/1991	2011	2031	FW Energy Applications, Inc. or DOE	Foster Wheeler
H.B. Robinson 2		SNM-2502	8/13/1986	2006	2046	Transnuclear, Inc.	NUHOMS
Humboldt Bay	BWR	SNM-2514	11/30/2005	2025	NA	Holtec International	HI-STORM 100HB
Idaho National Laboratory TMI-2 Fuel Debris	NA	SNM-2508	3/19/1999	2019	NA	Transnuclear, Inc.	NUHOMS
Idaho Spent Fuel Facility ^(a)	NA	SNM-2512	11/30/2004	2024	NA	Foster Wheeler Environmental Corp.	Concrete Vault
Morris Operation (GE Hitachi)	NA	SNM-2500	5/4/1982	2002	2022	NA	Wet storage
North Anna 1,2	PWR	SNM-2507	6/30/1998	2018	NA	Transnuclear, Inc.	NUHOMS-HD
Oconee 1,2,3	PWR		1/29/1990	2010	2050	Transnuclear, Inc.	NUHOMS
Prairie Island	PWR	SNM-2506	10/19/1993	2013	2053	Transnuclear, Inc.	TN Metal Casks
Private Fuel Storage Facility ^(a)	NA	SNM-2513	2/21/2006	2026	NA	Holtec International	HI-STORM 100
Rancho Seco	PWR	SNM-2510	6/30/2000	2020	NA	Transnuclear, Inc.	NUHOMS
Surry	PWR	SNM-2501	7/2/1986	2006	2046	General Nuclear	Castor
Surry	PWR	SNM-2501	7/2/1986	2006	2046	NAC International, Inc.	NAC-I28

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Table G-5. ISFSIs with Specific Licenses under Part 72 (cont'd)

Reactor	Reactor Type	Specific License No.	Initial License Start Date	Initial License Expiration Date	Renewed License Expiration Date	Vendor	System Design
Surry	PWR	SNM-2501	7/2/1986	2006	2046	Transnuclear, Inc.	NUHOMS
Surry	PWR	SNM-2501	7/2/1986	2006	2046	Westinghouse, Inc.	MC-10
Trojan	PWR	SNM-2509	3/31/1999	2019	NA	Holtec International	HI-STORM 100 or TranStor Cask

Sources: NRC 2012; Ux Consulting 2013; some information for Idaho National Laboratory TMI-2, the Private Fuel Storage facility, and Morris Operation obtained from additional sources: see DOE 2007 (for Idaho TMI-2 facility), NRC 2006 (for Private Fuel Storage), and NRC 2004 (for Morris).

(a) Facility was licensed but never constructed. In December, 2012, Private Fuel Storage requested termination of its license (PFS 2012).

HTGR = high-temperature gas-cooled reactor.

NA = Not applicable.

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Appendix H

Estimated Costs of Alternatives

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Estimated Costs of Alternatives

1 This appendix provides the cost information upon which the U.S. Nuclear Regulatory
2 Commission bases the cost portion of its costs and benefits analysis in Chapter 7 of this
3 draft *Waste Confidence Generic Environmental Impact Statement* (draft GEIS). Tables H-1
4 through H-3 provide the estimated costs of site-specific licensing reviews for new reactors,
5 reactor license renewals, and independent spent fuel storage installations (ISFSI), respectively.
6 Table H-4 provides estimated costs for generic elements of the alternatives, including costs for
7 development of the draft GEIS, rulemaking, and a policy statement, as applicable. Finally,
8 Table H-5 provides the total estimated costs for all alternatives.

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Table H-1. Estimated Site-Specific Costs for New Reactor Reviews

Cost per Activity ^(a)		NRC Cost	Licensee Cost ^(b)	Total Cost ^(c)	
	First review	\$1,670,000	\$1,670,000	\$3,350,000	
	Existing review with supplement	\$1,000,000	\$1,000,000	\$2,000,000	
	Existing review without supplement	\$51,900	\$51,900	\$104,000	
	New review	\$51,900	\$51,900	\$104,000	
	Title 10 of the <i>Code of Federal Regulations</i> (CFR) Part 50 review with supplement	\$242,000	\$242,000	\$484,000	
Year	Activity ^(d)	Number	Constant 2013	3% Discount	7% Discount
2015	First review	1	\$3,350,000	\$3,160,000	\$2,930,000
2015	Existing review with supplement	2	\$4,010,000	\$3,780,000	\$3,500,000
2015	10 CFR Part 50 review with supplement	1	\$484,000	\$457,000	\$423,000
2016	Existing review with supplement	3	\$6,010,000	\$5,500,000	\$4,910,000
2017	Existing review without supplement	2	\$208,000	\$184,000	\$158,000
2018	New review	2	\$208,000	\$179,000	\$148,000
Sum^(c)			\$14,300,000	\$13,300,000	\$12,100,000

- (a) As described in Chapter 7, the NRC estimates that the first site-specific review of continued storage in a new reactor environmental impact statement (EIS) would require approximately 3.9 full-time equivalents (FTE) for NRC and \$1 million in contractor support. The NRC estimates that subsequent site-specific reviews that require supplementation of existing EISs require approximate 2.9 FTE for NRC and \$500,000 in contract support. The NRC estimates that new-reactor reviews that do not require supplementation will require 0.3 FTE, or \$51,900. The NRC estimates that a review of the environmental impacts of continued storage for a new operating license under 10 CFR Part 50 will require 1.4 FTE.
- (b) The NRC assumes that licensees incur costs that are equal to those incurred by the NRC, so the total cost is double the NRC's costs.
- (c) Because of rounding, some costs may not appear to sum correctly.
- (d) The NRC assumes that Levy, South Texas Project (Units 3 and 4), Comanche Peak (Units 3 and 4), Calvert Cliffs, Fermi (Unit 3), and Lee EISs all will require supplementation. One of these reviews will be the first review, and the others are labeled as existing reviews with supplements. Watts Bar 2 is the 10 CFR Part 50 review with supplementation. The NRC assumes that North Anna and Turkey Point will not require supplementation as the NRC will not publish a final EIS by the end of fiscal year 2014; these two reviews are the existing reviews without supplements. Bell Bend and the PSE&G Power, LLC/PSE&G Nuclear, LLC Early Site Permit are treated as new reviews because the NRC is not likely to issue a draft EIS by the end of fiscal year 2014; the NRC assumes that the environmental impacts of continued storage will be addressed within a normal review schedule for those projects.

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Table H-2. Estimated Site-Specific Costs for Reactor License Renewals

Cost per Activity^(a)		NRC Cost	Licensee Cost^(b)	Total Cost^(c)	
	First review	\$433,000	\$433,000	\$865,000	
	Existing review with supplement	\$242,000	\$242,000	\$484,000	
	Existing review without supplement	\$190,000	\$190,000	\$381,000	
	New or subsequent renewal review	\$51,900	\$51,900	\$104,000	
Year	Activity^(d)	Number	Constant 2013	3% Discount	7% Discount
2015	First review	1	\$865,000	\$815,000	\$756,000
2015	Existing review with supplement	2	\$969,000	\$913,000	\$846,000
2016	Existing review with supplement	4	\$1,940,000	\$1,770,000	\$1,580,000
2017	Existing review without supplement	3	\$1,140,000	\$1,010,000	\$871,000
2017	Renewal review	1	\$104,000	\$92,200	\$79,200
2017	Subsequent renewal	1	\$104,000	\$92,200	\$79,200
2018	Renewal review	4	\$415,000	\$358,000	\$296,000
2018	Subsequent renewal	1	\$104,000	\$89,500	\$74,000
2019	Renewal review	3	\$311,000	\$261,000	\$207,000
2019	Subsequent renewal	1	\$104,000	\$86,900	\$69,100
2020	Renewal review	2	\$208,000	\$169,000	\$129,000
2020	Subsequent renewal	1	\$104,000	\$84,400	\$64,600
2021	Subsequent renewal	1	\$104,000	\$81,900	\$60,400
2022	Subsequent renewal	1	\$104,000	\$79,600	\$56,500
2023	Subsequent renewal	1	\$104,000	\$77,200	\$52,800
2024	Subsequent renewal	1	\$104,000	\$75,000	\$49,300
2025	Subsequent renewal	1	\$104,000	\$72,800	\$46,100
2026	Subsequent renewal	1	\$104,000	\$70,700	\$43,100
2027	Subsequent renewal	1	\$104,000	\$68,600	\$40,300
2028	Subsequent renewal	1	\$104,000	\$66,600	\$37,600

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Table H-2. Estimated Site-Specific Costs for Reactor License Renewals (cont'd)

Year	Activity ^(d)	Number	Constant 2013	3% Discount	7% Discount
2029	Subsequent renewal	1	\$104,000	\$64,700	\$35,200
2030	Subsequent renewal	1	\$104,000	\$62,800	\$32,900
2031	Subsequent renewal	1	\$104,000	\$61,000	\$30,700
2032	Subsequent renewal	1	\$104,000	\$59,200	\$28,700
2033	Subsequent renewal	1	\$104,000	\$57,500	\$26,800
2034	Subsequent renewal	1	\$104,000	\$55,800	\$25,100
2035	Subsequent renewal	1	\$104,000	\$54,200	\$23,400
2036	Subsequent renewal	1	\$104,000	\$52,600	\$21,900
2037	Initial or subsequent renewal	1	\$104,000	\$51,000	\$20,500
2038	Initial or subsequent renewal	1	\$104,000	\$49,600	\$19,100
2039	Initial or subsequent renewal	1	\$104,000	\$48,100	\$17,900
2040	Initial or subsequent renewal	1	\$104,000	\$46,700	\$16,700
2041	Initial or subsequent renewal	1	\$104,000	\$45,400	\$15,600
2042	Initial or subsequent renewal	1	\$104,000	\$44,000	\$14,600
2043	Initial or subsequent renewal	1	\$104,000	\$42,800	\$13,600
2044	Initial or subsequent renewal	1	\$104,000	\$41,500	\$12,700
Sum^(c)			\$8,860,000	\$7,180,000	\$5,790,000

(a) As described in Chapter 7, the NRC assumes that the first review would require an estimated 2.5 FTE, or \$433,000. The NRC further assumes that some reviews would require supplementation of existing EISs, and these reviews would require approximately 1.4 FTE, or \$242,000. Reviews that do not require supplementation would require approximately 1.1 FTE, or \$190,000. Reviews of future applications (those that have not yet been submitted) would require approximately 0.3 FTE, or \$51,900.

(b) The NRC assumes that licensees incur costs that are equal to those incurred by the NRC, so the total cost is double the NRC's costs.

(c) Due to rounding, some costs may not appear to sum correctly.

(d) The NRC assumes that South Texas Project (Units 1 and 2), Grand Gulf, Callaway, Limerick, Davis-Besse, Seabrook, and Indian Point would require supplementation given current project schedules. One of these reviews would be the first review. The NRC assumes that Sequoyah, Byron, and Braidwood will be existing reviews that do not require supplements by the end of fiscal year 2014. Diablo Canyon, Waterford, Fermi (Unit 2), Riverbend, La Salle, Perry, Clinton, two facilities in the STARS (Strategic Teaming and Resource Sharing) Alliance, and Watts Bar 1 are labeled as new license renewal reviews because the NRC will be able to address the environmental impacts of continued storage within the normal review schedule for those projects. The NRC has not identified specific plants that will seek subsequent license renewals, but estimates that half of the existing reactor fleet will do so.

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Table H-3. Estimated Site-Specific Costs for ISFSI Licensing

Cost per Activity ^(a)		NRC Cost	Licensee Cost ^(b)	Total Cost ^(c)	
First renewal review		\$86,500	\$86,500	\$173,000	
Renewal review		\$43,300	\$43,300	\$86,500	
Year	Activity ^(d)	Number	Constant 2013	3% Discount	7% Discount
2015	First renewal review	2	\$346,000	\$326,000	\$302,000
2018	Renewal review	1	\$86,500	\$74,600	\$61,700
2019	Renewal review	2	\$173,000	\$145,000	\$115,000
2020	Renewal review	1	\$86,500	\$70,300	\$53,900
2022	Renewal review	1	\$86,500	\$66,300	\$47,100
2024	Renewal review	1	\$86,500	\$62,500	\$41,100
2025	Renewal review	1	\$86,500	\$60,700	\$38,400
2026	Renewal review	2	\$173,000	\$118,000	\$71,800
2032	Renewal review	1	\$86,500	\$49,300	\$23,900
Sum^(e)			\$1,210,000	\$973,000	\$755,000

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- (a) As discussed in Chapter 7, the NRC estimates that approximately 0.5 FTE, or \$86,500, would be necessary to support site-specific consideration of Waste Confidence matters in the first two ISFSI Environmental Assessments, both of which are currently under review. The NRC estimates that later ISFSI Environmental Assessments will require 0.25 FTE, or \$43,300.
- (b) The NRC assumes that licensees incur costs that are equal to those incurred by the NRC, so the total cost is double the NRC's costs.
- (c) Due to rounding, some costs may not appear to sum correctly.
- (d) Activity dates are based on license expiration dates. Currently, two site-specific ISFSI license renewal applications, Calvert Cliffs and Prairie Island, are docketed at the NRC. Therefore, the NRC assumes that these reviews will be the first reviews. Other site-specific ISFSI licenses that will expire during the 30-year analysis period are North Anna (2018), Three Mile Island Unit 2 (2019), Trojan (2019), Rancho Seco (2020), GE Morris (2022), Diablo Canyon (2024), Idaho Spent Fuel Facility (calendar year 2024, but fiscal year 2025), Humboldt Bay (calendar year 2025, but fiscal year 2026), Private Fuel Storage (2026), and Fort St. Vrain (calendar 2031, but fiscal 2032). Other facilities with site-specific ISFSIs do not require renewal by 2044. See Appendix G for more information on ISFSIs.

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Table H-4. Estimated Costs of Generic Elements^(a)

GEIS Development (applies to all alternatives except No Action)			
	FTE^(b)	Contractor	Total
Annual Cost	20	\$3,000,000	\$6,460,000
Year^(c)	Constant 2013	3% Discount	7% Discount
2013	\$6,460,000	\$6,460,000	\$6,460,000
2014	\$6,460,000	\$6,270,000	\$6,040,000
Sum^(d)	\$12,900,000	\$12,700,000	\$12,500,000
Rulemaking (applies to the Proposed Action)			
	FTE^(b)	Contractor	Total
Annual Cost	3	\$0	\$519,000
Year^(c)	Constant	3% Discount	7% Discount
2013	\$519,000	\$519,000	\$519,000
2014	\$519,000	\$504,000	\$485,000
Sum^(d)	\$1,040,000	\$1,020,000	\$1,000,000
Policy Statement (Applies to the Policy Statement alternative)			
	FTE^(b)	Contractor	Total
Annual Cost	2	\$0	\$260,000
Year^(c)	Constant	3% Discount	7% Discount
2013	\$260,000	\$260,000	\$260,000
2014	\$260,000	\$252,000	\$243,000
Sum^(d)	\$519,000	\$511,000	\$502,000

(a) Generic elements are those portions of the alternatives that are not directly attributable to any site-specific review.

(b) One FTE costs \$173,000.

(c) The NRC assumes that the effort necessary to develop generic elements occurs during fiscal years 2013 and 2014.

(d) Due to rounding, some costs may not appear to sum correctly.

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Table H-5. Total Estimated Costs of Alternatives

No Action Alternative (site-specific reviews)			
	Constant 2013	3% Discount	7% Discount
New reactor reviews	\$14,300,000	\$13,300,000	\$12,100,000
Reactor license renewal	\$8,860,000	\$7,180,000	\$5,790,000
ISFSI licensing	\$1,210,000	\$973,000	\$755,000
Total Cost^(a)	\$24,300,000	\$21,400,000	\$18,600,000
Proposed Action (no site-specific reviews)			
	Constant 2013	3% Discount	7% Discount
GEIS	\$12,900,000	\$12,700,000	\$12,500,000
Rulemaking	\$1,040,000	\$1,020,000	\$1,000,000
Total Cost^(a)	\$14,000,000	\$13,800,000	\$13,500,000
GEIS-Only Alternative (site-specific reviews; possible cost savings)			
<i>With No Cost Savings^(b)</i>			
	Constant 2013	3% Discount	7% Discount
New reactor reviews	\$14,300,000	\$13,300,000	\$12,100,000
Reactor license renewal	\$8,860,000	\$7,180,000	\$5,790,000
ISFSI licensing	\$1,210,000	\$973,000	\$755,000
GEIS development	\$12,900,000	\$12,700,000	\$12,500,000
Total Cost^(a)	\$37,300,000	\$34,100,000	\$31,100,000
<i>With 50% Cost Savings^(b)</i>			
	Constant 2013	3% Discount	7% Discount
New reactor reviews	\$7,180,000	\$6,670,000	\$6,070,000
Reactor license renewal	\$4,430,000	\$3,590,000	\$2,900,000
ISFSI licensing	\$606,000	\$486,000	\$378,000
GEIS development	\$12,900,000	\$12,700,000	\$12,500,000
Total Cost^(a)	\$25,100,000	\$23,400,000	\$21,800,000
Policy Statement Alternative (site-specific reviews; possible cost savings)			
<i>With No Cost Savings^(b)</i>			
	Constant 2013	3% Discount	7% Discount
New reactor reviews	\$14,300,000	\$13,300,000	\$12,100,000
Reactor license renewal	\$8,860,000	\$7,180,000	\$5,790,000
ISFSI licensing	\$1,210,000	\$973,000	\$755,000
GEIS development	\$12,900,000	\$12,700,000	\$12,500,000
Policy statement	\$519,000	\$511,000	\$502,000
Total Cost^(a)	\$37,800,000	\$34,600,000	\$31,600,000

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1 **Table H-5. Total Estimated Costs of Alternatives (cont'd)**

Policy Statement Alternative, cont'd			
<i>50% Cost Savings^(b)</i>	Constant 2013	3% Discount	7% Discount
New reactor reviews	\$7,130,000	\$6,630,000	\$6,030,000
Reactor license renewal	\$4,430,000	\$3,590,000	\$2,900,000
ISFSI licensing	\$606,000	\$486,000	\$378,000
GEIS development	\$12,900,000	\$12,700,000	\$12,500,000
Policy statement	\$519,000	\$511,000	\$502,000
Total Cost^(a)	\$25,100,000	\$23,400,000	\$21,800,000

(a) Due to rounding, some costs may not appear to sum correctly.

(b) The NRC estimates that staff and applicants may reduce their efforts by as much as 50% compared to the No-Action alternative in both the GEIS-only and Policy Statement alternatives. While effort will vary in each review, the reliance on the GEIS (and policy statement) to address generic issues related to continued storage will entirely resolve concerns for some issues, while other issues may require additional effort in resolving comments, addressing site-specific litigation, or establishing that the GEIS findings are applicable to a specific licensing proceeding.

2 **References**

3 10 CFR Part 50. *Code of Federal Regulations*, Title 10, *Energy*, Part 50, "Domestic Licensing of
4 Production and Utilization Facilities."

5 10 CFR Part 52. *Code of Federal Regulations*, Title 10, *Energy*, Part 52, "Licenses,
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