



State of Utah

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Environmental Quality

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Executive Director

DIVISION OF WASTE MANAGEMENT
AND RADIATION CONTROL

Douglas J. Hansen
Director

March 11, 2024

Vern C. Rogers, Director of Regulatory Affairs
EnergySolutions, LLC
299 South Main Street, Suite 1700
Salt Lake City, UT 84111

RE: Federal Cell Facility Application Request for Information

Dear Mr. Rogers:

The Division of Waste Management and Radiation Control (Division) hereby provides follow-up Requests for Information (RFI) regarding the Federal Cell Facility Application dated August 4, 2022.

Each RFI in the attached document represents a follow up to an RFI issued earlier in the application review process. The numbering system ties the additional questions to the initial RFI with an added letter designation. When responding to an RFI, please use the assigned number representing the question.

With this round of follow-up RFIs, the Division recommends that appropriate staff from the Licensee, the Division, and consultants meet to discuss each matter for clarity.

Please contact Otis Willoughby at 385-622-2213 to schedule a meeting.

Sincerely,

Douglas J. Hansen, Director
Division of Waste Management and Radiation Control

DJH/OHW/JMK/wa

Enclosure: Federal Cell Application Review – Request for Info. or Updates to the Application (RFI)

c: Jeff Coombs, EHS, Health Officer, Tooele County Health Department
Bryan Slade, Environmental Health Director, Tooele County Health Department
EnergySolutions General Correspondence Email
LLRW General Correspondence Email

DRC-2024-004818

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Federal Cell Application Review

Request for Information or Updates to the Application (RFI)

General

- Each of the RFI's has been assigned an identifier with a numbering convention as follows:

- Application/Appendix Section
 - Section/Appendix Subsection
 - Section/Appendix Subsubsection (when applicable)
 - Sequential numbering

Example: A question in Section 1, subsection 1, subsubsection 1 -The first RFI # would be 1.1.1-1, the next question in that section/subsection would be numbered 1.1.1-2

Please refer to the assigned RFI number when submitting a response.

Section 1:

GENERAL INFORMATION

- **1.2.2-1.a**

In the RFI sent on September 30, 2022, the non-working link reference was titled General Industrial District M-G type uses. The response includes an updated link that is now titled Hazardous Industrial District MG-H. Was this change intentional? If yes, please describe the reason for the correction.

- **1.2.2-4.a**

The first reference to 14004-L01 is found on application page 2-19 in section 2.4.1. Please add language in section 1.2 referencing the engineering drawings or add elevation points to figure 1-2.

- **1.2.3(5)-2.a**

Please revise the narrative to include language specifying the license amendment number (3), as well as revising the link to the corresponding amendment. The updated link points the reader to Amendment 0.

Section 2:

SITE CHARACTERISTICS

- **2.1.2-1.a**

“Census 2020” link requires privacy acceptance.

- **2.3.1-1.a**

The link was removed but Hintze, 1980 is still referenced. It now generates a “Hintze, 1980” link error.

- **2.3.1.5-1.a**

EnergySolutions’ response to this RFI states the reference for Black et al (1999) is found in section 2.3.2.1; when searched, there is only one instance of Black et al (1999) found in section 2.3.2.3. Please review and correct as needed.

- **2.4.2-1.a**

The request to revise the application from “unconfined aquifer” to “shallow aquifer” was not completed but rather updates were made to “shallow unconfined aquifer.” Please provide justification for the significance of including the word “unconfined” in the terminology.

- **2.4.2-3.a**

Continuation of RFI 2.4.2-1 response. Please provide justification for the significance of the use of “unconfined” in the terminology.

- **2.4.2-4.a**

Continuation of RFI 2.4.2-1 response. Please provide justification for the significance of the use of “unconfined” in the terminology.

- **2.4.2-5.a**

Continuation of RFI 2.4.2-1 response. Please provide justification for the significance of the use of “unconfined” in the terminology.

- **2.4.2-6.a**

Continuation of RFI 2.4.2-1 response. Please provide justification for the significance of the use of “unconfined” in the terminology.

- **2.4.2-8.a**

The request to revise the aquifer classification was completed. However, there was an additional update in this section of the application (2.4.2, page 28) that changed the name Lone Mountain to Cedar Mountain. Please provide reasoning for the change in naming.

- **2.4.2-10.a**

Please provide the location or reference where this Section can be found.

- **2.10-1.a**

The electronic links for Moore and Sorenson 1979 and NUREG-1476 are not functioning. Please revise with correct links to citation references.

Section 3:

DESIGN AND CONSTRUCTION

- **3.1.2.a**

Link has been removed. Please revise the link in the footnote “[1]”. It is missing in the current application.

- **3.2.9-1.a**

The reference to the Part B Attachment II-6 Contingency Plan remains in the application. We understand this updates annually. To ensure we keep the application up to date, please remove and reference the most up-to-date version of the Clive Facility Contingency Plan. In addition, the contingency quick reference guide A2-6-1 should be included.

- **3.4.1-1.a**

The reference to the Part B Attachment II-6 Contingency Plan remains in the application. We understand this updates annually. To ensure we keep the application up to date, please remove and reference the most up to date version of the Clive Facility Contingency Plan. In addition, the contingency quick reference guide A2-6-1 should be included.

- **3.4.3-1.a**

The reference to the Part B Attachment II-6 Contingency Plan remains in the application. We understand this updates annually. To ensure we keep the application up to date, please remove and reference the most up to date version of the Clive Facility Contingency Plan. In addition, the contingency quick reference guide A2-6-1 should be included.

- **3.5.1.1.a**

The reference to the Part B Attachment II-6 Contingency Plan remains in the application. We understand this updates annually. To ensure we keep the application up to date, please remove and reference the most up to date version of the Clive Facility Contingency Plan. In addition, the contingency quick reference guide A2-6-1 should be included.

Section 4:

FACILITY OPERATIONS

▪ **4.4.7-2a**

The reference to the Part B Attachment II-6 Contingency Plan remains in the application. We understand this updates annually. To ensure we keep the application up to date, please remove and reference the most up to date version of the Clive Facility Contingency Plan. In addition, the contingency quick reference guide A2-6-1 should be included.

▪ **4.5.1-1.a**

The reference to the Part B Attachment II-6 Contingency Plan remains in the application. We understand this updates annually. To ensure we keep the application up to date, please remove and reference the most up to date version of the Clive Facility Contingency Plan. In addition, the contingency quick reference guide A2-6-1 should be included.

▪ **4.5.1-X.a**

The link for NRC 1980 on page 4-26 under section 4.5.1 “Hot-Linked Files” is not functioning. Please revise.

Section 5:

FEDERAL CELL FACILITY CLOSURE PLAN AND CONTROL

▪ **5.1.2.2-1.a**

Please revise language to include full name of NRC 1986 reference and guide reader to appendix (M) at first instance of reference instead of the final reference point.

▪ **5.2.7-1.a**

The link in section 5.2.7 for the “GWQDP” has been removed rather than updated. Please revise with a functioning link.

▪ **5.3.8-1.a**

The reference to “DOE (2019)” does not have a hotlink. Please revise the link or include it as an attachment to the application.

- **5.3.9-1.a**

The reference to “DOE (2019)” does not have a hotlink. Please revise the link or include it as an attachment to the application.

Section 8:

CONDUCT OF OPERATIONS

- **8.4-1.a**

The reference to the Part B Attachment II-6 Contingency Plan remains in the application. We understand this updates annually. To ensure we keep the application up to date, please remove and reference the most up to date version of the Clive Facility Contingency Plan. In addition, the contingency quick reference guide A2-6-1 should be included.

- **8.8.1-1.a**

The reference to the Part B Attachment II-6 Contingency Plan remains in the application. We understand this updates annually. To ensure we keep the application up to date, please remove and reference the most up to date version of the Clive Facility Contingency Plan. In addition, the contingency quick reference guide A2-6-1 should be included.

Section K:

DRAINAGE DITCH CALCULATIONS

K-1.a

The citation reference for Kusnetz has been updated. However, the citation reference to ANSI 1973 has been deleted. Please explain the reason for removal.

K-2.a

The citation referenced on page 34 of 45 to Public Health Services (1957) was deleted rather than updated in the REFERENCES section. Please explain the reason for removal.