

**APPENDIX B**  
**CONSULTATION LETTERS**

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November 12, 2003

Ms. Nancy Strayer  
Assistant Chief of Natural Areas and Preserves  
Ohio Department of Natural Resources  
1889 Fountain Square, Building F-1  
Columbus, Ohio 43224

**CERTIFIED MAIL**  
7001 1940 0007 8210 8516

**Letter of Consultation for the Proposed Construction and Operation of the American Centrifuge Commercial Plant at the Portsmouth Gaseous Diffusion Plant in Piketon, Ohio**

USEC Inc. (USEC) is preparing an Environmental Report (ER) in accordance with 10 *Code of Federal Regulations* (CFR) 51.45 for the proposed use of several former U.S. Department of Energy (DOE) Gas Centrifuge Enrichment Plant (GCEP) buildings, associated parking areas, and pedestrian/vehicle portals on the DOE Portsmouth Gaseous Diffusion Plant (PORTS) reservation. USEC proposes to construct and operate the American Centrifuge Commercial Plant, a uranium enrichment facility that would produce 3.5 million separative work units (SWU) using centrifuge technology. The enriched uranium is sold for use in nuclear power plants to generate electricity. This site is one of two under consideration by USEC for the American Centrifuge Commercial Plant. A siting decision has not been made; but is expected later this calendar year.

USEC is a private corporation regulated by the U.S. Nuclear Regulatory Commission (NRC). The American Centrifuge Commercial Plant is the third step in USEC's plan to demonstrate and deploy the American Centrifuge technology. The first step is the Demonstration Project, which is underway in Oak Ridge, Tennessee, and will demonstrate an economically attractive gas centrifuge machine and enrichment process. The second step is the deployment of the American Centrifuge Lead Cascade Facility at PORTS, which is also underway and will provide reliability, performance, cost, and other vital data of the enrichment process. Based on the success of these initial two steps, USEC will make a final decision whether to deploy the American Centrifuge Commercial Plant.

The proposed action would result from locating the Commercial Plant at the site of the former DOE GCEP and the existing site of the American Centrifuge Lead Cascade Facility. The GCEP facilities, located within DOE's PORTS reservation were built in the early 1980s. The GCEP program was terminated in 1985.

The GCEP facilities are adjacent to the existing gaseous diffusion plant, which ceased uranium enrichment operations in May 2001. Currently, the primary uses of the GCEP facilities are waste storage, warehouse activities, office and locker areas for support functions for the DOE. Upon NRC issuance of a license next year, the Lead Cascade Facility will be allowed to operate up to 240 centrifuge machines in the recycle mode as a "closed loop" system.

The Commercial Plant would utilize two existing process buildings (i.e., X-3001 and X-3002) filled with centrifuge machines in a cascade arrangement to produce 3.5 million SWU of enriched uranium <sup>235</sup>U. The two process buildings will house the centrifuge machines, associated process piping, instrumentation and controls, computer systems, and auxiliary support equipment. Other facilities to be used in the Commercial Plant operations will include the X-3012 Process Support Building, X-7726 Centrifuge Training and Test Facility, X-7727H Transfer Corridor, and X-7725 Recycle and Assembly Building. The X-3012 will provide oversight and control of the equipment in the cascade and also provides offices, lockers, change rooms, and break rooms. The X-7726 provides area to receive and test centrifuge components, and assemble and repair centrifuges. The X-7725 performs the same functions as the X-7726 only on a larger scale and provides administrative facilities, training rooms, and the storage and maintenance areas for the intra-plant transporter. An intra-plant transporter moves centrifuge machines between the X-7725 or the X-7726 to the X-3001 or X-3002 through the covered and environmentally controlled X-7727H. In addition to these facilities, USEC provides support facilities for the Commercial Plant. A Feed and Toll Transfer Facility, and Product and Tails Withdrawal Facility will be refurbished/constructed adjacent to the Process Buildings. Some areas and facilities described here and depicted in Attachment 1 are owned by the DOE and would be leased by USEC. USEC is also evaluating, as part of the Environmental Report, the siting and operation of additional capacity directly south of the existing process buildings (depicted in green in Attachment 1). New building(s) that would house the centrifuges would approximately double the SWU capacity of the facility.

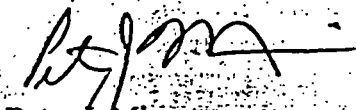
This letter is intended to serve as informal consultation regarding protected or rare species that may be on or near the site. In this regards, USEC requests an updated list of protected species and habitats on the PORTS reservation and solicits your recommendations and comments about the potential effects of this proposed action. Documentation of your Consultation will be included in the USEC Environmental Report for the American Centrifuge Commercial Plant.

Ms. Nancy Strayer  
November 12, 2003  
Page 3 of 4

Information contained in Attachment 1 is considered proprietary to USEC and is requested to be withheld from public disclosure.

If you need further information on this proposed action, please do not hesitate to call me at 740-897-2710 or Greg Fout at 740-897-3823.

Sincerely,



Peter J. Miner  
Regulatory Manager

**Attachments**

cc/att:

Kelly Coriell  
Greg Fout  
T. J. Justice, Governor's Economic Development Office  
James Morgan  
Mario Robles  
Carol O'Claire, Ohio Emergency Management Agency  
File - RO-390-03-003E



Division of Natural Areas and Preserves  
Ohio Department of Natural Resources  
1889 Fountain Square Court, F-1  
Columbus, Ohio 43224

Date:

11/18/03

**FACSIMILE TRANSMISSION**

Please deliver the following fax message to:

Name: Peter Mener

From: Debbie Woischke (614-265-6818)

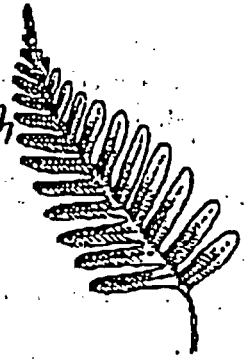
Total number of pages including this cover sheet: 3 If you do not receive all the pages, please call: Office Number: 614/265-6456 Fax Number: 614/267-3096

Comments:

In order to process your request for information for the Cont./op. American Centrifuge Comm. Plant at Portsmouth

project, please fill out and return the data request form. Please note our fees listed at the top of the form. Feel free to call if you have any questions. Thank you.

*Asparagus diffusum*  
Plant, Pilsbry





**DATA REQUEST**

OHIO DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF NATURAL AREAS AND PRESERVES  
HERITAGE DATA SERVICES  
1889 FOUNTAIN SQUARE COURT, BUILDING F-1  
COLUMBUS, OHIO 43224  
PHONE: 614-265-6453; FAX: 614-267-3096

**INSTRUCTIONS:**

Please fill out both sides of this data request form, sign it and return it to the address or fax number listed above along with: (1) a letter formally requesting data and describing your project, and (2) a map detailing the boundaries of your study area. A photocopy from the pertinent portion of a USGS 7.5 minute topographic map is preferred but other maps are acceptable. Our turnaround time is two weeks, although we can often respond more quickly.

**FEES:**

Fees are determined by the amount of time it takes to complete your project. The charge is \$25.00 per 1/2 hour with a 1/2 hour minimum. We can perform a data search manually or by computer. The Heritage Data Services staff will determine the most cost-efficient method of doing your search. A cost estimate can be provided upon request. Unless otherwise specified, an invoice will accompany the data services response.

\*\*\*\*\*

This request is being submitted by:  fax  mail  both

Date: \_\_\_\_\_

Your Agency/Organization: \_\_\_\_\_

Your Name/Title: \_\_\_\_\_

Address: \_\_\_\_\_

City/State/Zip: \_\_\_\_\_

Phone/Fax: \_\_\_\_\_

Project Name/Number: \_\_\_\_\_

Project is located on the following USGS 7.5 minute topographic map(s): \_\_\_\_\_

If there is a program or contracting agency requiring this information, please give the name and phone number of a contact person:

\_\_\_\_\_

The Natural Heritage Data Base contains records for the categories of species and features listed below. Check the appropriate boxes to indicate your selection.

- PLANTS:  Federal Status Only  
 State Legal Status Only  
 Rare (non-legal status)  
 All of the above

- ANIMALS:  Federal Status Only  
 State Legal Status Only  
 Rare (non-legal status)  
 All of the above

- PLANT COMMUNITIES:  All  
 Wetlands Only  
 Other \_\_\_\_\_

- OTHER FEATURES:  Geologic Features  
 Breeding/Non-breeding Animal Concentrations  
 Champion Trees  
 State Nature Preserves and Natural Areas  
 State Wild, Scenic and Recreational Rivers  
 State Parks, Forests, Wildlife Areas  
 All of the above  
 Other \_\_\_\_\_

Besides name, location and status, specify any additional information you need:

---



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- The area you want searched:  study area as outlined on the map  
 study area plus 1/2 mile radius  
 study area plus 1 mile radius  
 other \_\_\_\_\_

How will the information be used:

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The information supplied above is complete and accurate. Any material supplied by the Natural Heritage Data Base will not be published without prior written permission and without crediting the Division of Natural Areas and Preserves as the source of the material.

Your Signature \_\_\_\_\_





November 25, 2003

Ms. Nancy Strayer  
Assistant Chief of Natural Areas and Preserves  
Ohio Department of Natural Resources  
1889 Fountain Square, Building F-1  
Columbus, Ohio 43224

**Heritage Data Request regarding the Proposed Construction and Operation of the American Centrifuge Commercial Plant at the Portsmouth Gaseous Diffusion Plant in Piketon, Ohio**

As requested by your office on November 18, 2003, Attachment 1 of this letter submits a Heritage Data Request and Attachment 2 submits copies of the U. S. Geological Survey (USGS) 7.5 minute topographic maps associated with the American Centrifuge Commercial Plant in Piketon, Ohio. Please reference the previously submitted USEC letter (RO-390-03-003E dated November 12, 2003) for the information pertaining to this project. Documentation of your Consultation will be included in the USEC Environmental Report for the American Centrifuge Commercial Plant.

If you need further information on this proposed action, please do not hesitate to call me at 740-897-2710 or Greg Fout at 740-897-3823.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter J. Miner".

Peter J. Miner  
Regulatory Manager

Attachments as stated

cc/att:  
Kelly Coriell  
Greg Fout  
T. J. Justice, Governor's Economic Development Office  
James Morgan

Mario Robles  
Carol O'Claire, Ohio Emergency  
Management Agency  
File - RO-390-03-005E

**Attachment 1 to letter RO-390-03-005E**

**Heritage Data Request**



**DATA REQUEST**

OHIO DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF NATURAL AREAS AND PRESERVES  
HERITAGE DATA SERVICES  
1889 FOUNTAIN SQUARE COURT, BUILDING F-1  
COLUMBUS, OHIO 43224  
PHONE: 614-265-6453; FAX: 614-267-3096

**INSTRUCTIONS:**

Please fill out both sides of this data request form, sign it and return it to the address or fax number listed above along with: (1) a letter formally requesting data and describing your project, and (2) a map detailing the boundaries of your study area. A photocopy from the pertinent portion of a USGS 7.5 minute topographic map is preferred but other maps are acceptable. Our turnaround time is two weeks, although we can often respond more quickly.

**FEES:**

Fees are determined by the amount of time it takes to complete your project. The charge is \$25.00 per 1/2 hour with a 1/2 hour minimum. We can perform a data search manually or by computer. The Heritage Data Services staff will determine the most cost-efficient method of doing your search. A cost estimate can be provided upon request. Unless otherwise specified, an invoice will accompany the data services response.

\*\*\*\*\*  
This request is being submitted by:  fax  mail  both

Date: 11/21/03

Your Agency/Organization: USEC Inc.

Your Name/Title: Peter J. Miner, Regulatory Manager

Address: P.O. Box 628, 3930 U.S. Route 23 South, MS-1212

City/State/Zip: Piketon, OH 45661

Phone/Fax: 740/897-2710 and Fax 740/897-4541

Project Name/Number: American Centrifuge Commercial Plant/T3605001

Project is located on the following USGS 7.5 minute topographic map(s): \_\_\_\_\_

To be provided via mail. A total of four maps will be provided.

If there is a program or contracting agency requiring this information, please give the name and phone number of a contact person:

The Natural Heritage Data Base contains records for the categories of species and features listed below. Check the appropriate boxes to indicate your selection.

- PLANTS:  Federal Status Only  
 State Legal Status Only  
 Rare (non-legal status)  
 All of the above

- ANIMALS:  Federal Status Only  
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- PLANT COMMUNITIES:  All  
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 Other \_\_\_\_\_

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 State Parks, Forests, Wildlife Areas  
 All of the above  
 Other \_\_\_\_\_

Besides name, location and status, specify any additional information you need:

NA

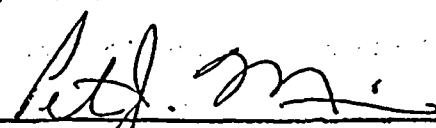
- The area you want searched:  study area as outlined on the map  
 study area plus 1/2 mile radius  
 study area plus 1 mile radius  
 other \_\_\_\_\_

How will the information be used:

Documentation of this consultation will be included in the USEC Environmental Report for the American Centrifuge Commercial Plant.

The information supplied above is complete and accurate. Any material supplied by the Natural Heritage Data Base will not be published without prior written permission and without crediting the Division of Natural Areas and Preserves as the source of the material.

Your Signature

  
 Peter J. Miner, 11/21/03  
 Regulatory Manager  
 USEC Inc.

---

**Attachment 2 to letter RO-390-03-005E**

**USGS 7.5 Minute Topographic Maps**



# Ohio Department of Natural Resources

BOB TAFT, GOVERNOR

SAMUEL W. SPECK, DIRECTOR

Division of Natural Areas and Preserves  
Nancy Strayer, Acting Chief  
1889 Fountain Square, Bldg. F-1  
Columbus, OH 43224-1388  
Phone: (614) 265-6453; Fax: (614) 267-3096

December 1, 2003

Peter Miner  
USEC Inc.  
PO Box 628  
3930 U.S. Rt. 23 South  
MS-1212  
Piketon, OH 45661

Dear Mr. Miner:

After reviewing our Natural Heritage maps and files, I find the Division of Natural Areas and Preserves has no records of rare or endangered species in the proposed American Centrifuge Commercial Plant Construction project area, including a one mile radius, at the Portsmouth Gaseous Diffusion Plant in Piketon, Pike County, on the Piketon, Waverly South, Wakefield and Lucasville Quads (T3605001).

There are no existing or proposed state nature preserves or scenic rivers at the project site. We are also unaware of any unique ecological sites, geologic features, breeding or non-breeding animal concentrations, champion trees, or state parks, forests or wildlife areas within a one mile radius of the project area.

Our inventory program has not completely surveyed Ohio and relies on information supplied by many individuals and organizations. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area. Please note that although we inventory all types of plant communities, we only maintain records on the highest quality areas. Also, we do not have data for all Ohio wetlands. For National Wetlands Inventory maps, please contact Madge Fitak in the Division of Geological Survey at 614-265-6576.

Please contact me at 614-265-6818 if I can be of further assistance.

Sincerely,

A handwritten signature in cursive script that reads "Debbie Woischke".

Debbie Woischke, Data Specialist  
Division of Natural Areas & Preserves



November 12, 2003

Mr. Jim Borchelt  
District Conservationist  
Natural Resources Conservation Service  
11752 State Route 104  
Waverly, Ohio 45690

**CERTIFIED MAIL**  
**7001 1940 0007 8210 8509**

**Farmland Conservation Impact Rating: Installation and Operation of the American Centrifuge Commercial Plant at the Portsmouth Gaseous Diffusion Plant in Piketon, Ohio**

USEC Inc. (USEC) is preparing an Environmental Report (ER) in accordance with 10 *Code of Federal Regulations* (CFR) 51.45 for the proposed use of several former U.S. Department of Energy (DOE) Gas Centrifuge Enrichment Plant (GCEP) buildings, associated parking areas, and pedestrian/vehicle portals on the DOE Portsmouth Gaseous Diffusion Plant (PORTS) reservation. USEC proposes to construct and operate the American Centrifuge Commercial Plant, a uranium enrichment facility that would produce 3.5 million separative work units (SWU) using centrifuge technology. The enriched uranium is sold for use in nuclear power plants to generate electricity. This site is one of two under consideration by USEC for the American Centrifuge Commercial Plant. A siting decision has not been made; but is expected later this calendar year.

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In order to comply with the requirements of the *Farmland Protection Policy Act* and to rate the relative impact of the proposed action, USEC is submitting a Farmland Conversion Impact Rating form (form AD-1006). The affected 200 acres are located in existing site facilities originally designed, constructed, and intended for gas centrifuge enrichment on land that has been previously converted to industrial use; therefore, should not require any farmland conversion. The results of the Farmland Conversion Impact Rating will be included in the USEC Environmental Report for the American Centrifuge Commercial Plant after the process and any further consultation with the Natural Resources Conservation Service is complete.

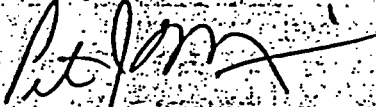


Mr. Jim Borchelt  
November 12, 2003  
Page 3 of 4

Information contained in Attachment 1 is considered proprietary to USEC and is requested to be withheld from public disclosure.

If you need further information on this proposed action, please do not hesitate to call me at 740-897-2710 or Greg Fout at 740-897-3823.

Sincerely,



Peter J. Miner  
Regulatory Manager

**Attachments**

cc/att:

Kelly Coriell  
Greg Fout  
T. J. Justice, Governor's Economic Development Office  
James Morgan  
Mario Robles  
Carol O'Claire, Ohio Emergency Management Agency  
File - RO-390-03-002E

# FARMLAND CONVERSION IMPACT RATING

<b>PART I (To be completed by Federal Agency)</b>	Date Of Land Evaluation Request <b>November 12, 2003</b>
Name Of Project <b>Commercial Plant</b>	Federal Agency Involved <b>U.S. Nuclear Regulatory Commission</b>
Proposed Land Use <b>Continued Commercial/Industrial Use</b>	County And State <b>Pike County, Ohio</b>

<b>PART II (To be completed by SCS)</b>		Date Request Received By SCS
Does the site contain prime, unique, statewide or local important farmland? (If no, the EPA does not apply. Do not complete additional parts of this form.)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Acres Irrigated / Average Farm Size
Major Contaminant	Farmable Land (to Govt. Acquisition)	Amount Of Farmland As Defined In EPA Act
Name Of Land Evaluation System Used	Name Of Local Site Assessment System	Date Of Land Evaluation Requested By SCS

<b>PART III (To be completed by Federal Agency)</b>	<b>Alternative Site Rating</b>			
	<b>Site A</b>	<b>Site B</b>	<b>Site C</b>	<b>Site D</b>
A. Total Acres To Be Converted Directly	0			
B. Total Acres To Be Converted Indirectly	0			
C. Total Acres In Site	200			

<b>PART IV (To be completed by SCS) Land Evaluation Information</b>				
A. Total Acres Prime And Unique Farmland				
B. Total Acres Statewide And Local Important Farmland				
C. Percentage Of Farmland In County Or Local Government To Be Converted				
D. Percentage Of Farmland In Conversion With One Of Highest Relative Value				
<b>PART V (To be completed by SCS) Land Evaluation Criterion</b>				
Relative Value Of Farmland To Be Converted (Scale Of 1 To 100 Points)				

<b>PART VI (To be completed by Federal Agency)</b>	Maximum Points			
Site Assessment Criteria (These criteria are explained in 7 CFR 658.5(b))				
1. Area In Nonurban Use				
2. Perimeter In Nonurban Use				
3. Percent Of Site Being Farmed				
4. Protection Provided By State And Local Government				
5. Distance From Urban Builtup Area				
6. Distance To Urban Support Services				
7. Size Of Present Farm Unit Compared To Average				
8. Creation Of Nonfarmable Farmland				
9. Availability Of Farm Support Services				
10. On-Farm Investments				
11. Effects Of Conversion On Farm Support Services				
12. Compatibility With Existing Agricultural Use				
<b>TOTAL SITE ASSESSMENT POINTS</b>	<b>160</b>			

<b>PART VII (To be completed by Federal Agency)</b>				
Relative Value Of Farmland (From Part V)	100			
Total Site Assessment (From Part VI above or a local site assessment)	160			
<b>TOTAL POINTS (Total of above 2 lines)</b>	<b>260</b>			

Site Selected:	Date Of Selection	Was A Local Site Assessment Used? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
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Reason For Selection:

United States Department of Agriculture



Natural Resources Conservation Service  
11752 State Route 104  
Waverly, Oh 45690

740-947-5353

December 5, 2003

Pete J. Miner  
USEC P.O. Box 628  
Piketon, Ohio 45661

Dear Mr. Miner,

In response to your 11-17-03 letter regarding the Commercial Plant project and form AD-1006 prime farmland determination, the following applies. The project site is mapped UoA, Urban Land -Omulga Complex, 0-6% slopes, according to the Pike County Soil Survey, sheet 48.

This mapping is non-prime soils and therefore the FPPA does not apply. Enclosed in the 11-18-03 mailing were your copies for further processing.

Good luck with the project and thank you for contacting NRCS in Pike County.

Sincerely,

A handwritten signature in cursive script that reads "Jim Borchelt".

Jim Borchelt  
District Conservationist

JB/mef

# FARMLAND CONVERSION IMPACT RATING

<b>PART I (To be completed by Federal Agency)</b>	Date Of Land Evaluation Request <b>November 12, 2003</b>
Name Of Project <b>Commercial Plant</b>	Federal Agency Involved <b>U.S. Nuclear Regulatory Commission</b>
Proposed Land Use <b>Continued Commercial/Industrial Use</b>	County And State <b>Pike County, Ohio</b>

<b>PART II (To be completed by SCS)</b>	Date of Land Evaluation Request by SCS <b>11-17-03</b>
Does the site contain prime, unique, statewide or local important farmland? (If no, the FPPA does not apply - do not complete additional parts of this form)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Major Crops	Amount Of Farmland As Defined In FPPA Acres
Name Of Land Evaluation System Used	Date Land Evaluation Requested by SCS <b>11-18-03</b>

	Alternative Site Rating			
	Site A	Site B	Site C	Site D
<b>A. Total Acres To Be Converted Directly</b>	0			
<b>B. Total Acres To Be Converted Indirectly</b>	0			
<b>C. Total Acres In Site</b>	200			

<b>PART IV (To be completed by SCS) Land Evaluation Information</b>				
A. Total Acres Prime And Unique Farmland				
B. Total Acres Statewide And Local Important Farmland				
C. Percentage Of Farmland In County Or Local Govt. Unit to be Converted				
D. Percentage Of Farmland In county or local gov. unit with a soil of high or better value				

<b>PART V (To be completed by SCS) Land Evaluation Information</b>				
Relative Value Of Farmland To Be Converted (Scale of 0 to 100 Points)				

<b>PART VI (To be completed by Federal Agency)</b>	Maximum Points				
Site Assessment Criteria (These criteria are explained in 7 CFR 658.5(b))					
1. Area In Nonurban Use					
2. Perimeter In Nonurban Use					
3. Percent Of Site Being Farmed					
4. Protection Provided By State And Local Government					
5. Distance From Urban Builtup Area					
6. Distance To Urban Support Services					
7. Size Of Present Farm Unit Compared To Average					
8. Creation Of Nonfarmable Farmland					
9. Availability Of Farm Support Services					
10. On-Farm Investments					
11. Effects Of Conversion On Farm Support Services					
12. Compatibility With Existing Agricultural Use					
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Relative Value Of Farmland (From Part V)	100				
Total Site Assessment (From Part VI above or a local site assessment)	160				
<b>TOTAL POINTS (Total of above 2 lines)</b>	<b>260</b>				

Site Selected:	Date Of Selection	Was A Local Site Assessment Used? Yes <input type="checkbox"/> No <input type="checkbox"/>
----------------	-------------------	---

Reason For Selection:



November 12, 2003

Mr. Mark Epstein  
Archeology Reviews Manager  
Resource Protection and Review  
567 East Hudson Street  
Columbus, Ohio 43211-1030

**CERTIFIED MAIL**  
**7001 1940 0007 8210 8523**

**National Historic Preservation Act, Section 106 Compliance, Installation and Operation of the American Centrifuge Commercial Plant at the Portsmouth Gaseous Diffusion Plant in Piketon, Ohio**

USEC Inc. (USEC) is preparing an Environmental Report (ER) in accordance with 10 *Code of Federal Regulations* (CFR) 51.45 for the proposed use of several former U.S. Department of Energy (DOE) Gas Centrifuge Enrichment Plant (GCEP) buildings, associated parking areas, and pedestrian/vehicle portals on the DOE Portsmouth Gaseous Diffusion Plant (PORTS) reservation. USEC proposes to construct and operate the American Centrifuge Commercial Plant, a uranium enrichment facility that would produce 3.5 million separative work units (SWU) using centrifuge technology. The enriched uranium is sold for use in nuclear power plants to generate electricity. This site is one of two under consideration by USEC for the American Centrifuge Commercial Plant. A siting decision has not been made; but is expected later this calendar year.

USEC is a private corporation regulated by the U.S. Nuclear Regulatory Commission (NRC). The American Centrifuge Commercial Plant is the third step in USEC's plan to demonstrate and deploy the American Centrifuge technology. The first step is the Demonstration Project, which is underway in Oak Ridge, Tennessee, and will demonstrate an economically attractive gas centrifuge machine and enrichment process. The second step is the deployment of the American Centrifuge Lead Cascade Facility at PORTS, which is also underway and will provide reliability, performance, cost, and other vital data of the enrichment process. Based on the success of these initial two steps, USEC will make a final decision whether to deploy the American Centrifuge Commercial Plant.

The proposed action would result from locating the Commercial Plant at the site of the former DOE GCEP and the existing site of the American Centrifuge Lead Cascade Facility. The GCEP facilities, located within DOE's PORTS reservation were built in the early 1980s. The GCEP program was terminated in 1985.

The GCEP facilities are adjacent to the existing gaseous diffusion plant, which ceased uranium enrichment operations in May 2001. Currently, the primary uses of the GCEP facilities are waste storage, warehouse activities, office and locker areas for support functions for the DOE.

Upon NRC issuance of a license next year, the Lead Cascade Facility will be allowed to operate up to 240 centrifuge machines in the recycle mode as a "closed loop" system.

The Commercial Plant would utilize two existing process buildings (i.e., X-3001 and X-3002) filled with centrifuge machines in a cascade arrangement to produce 3.5 million SWU of enriched uranium <sup>235</sup>U. The two process buildings will house the centrifuge machines, associated process piping, instrumentation and controls, computer systems, and auxiliary support equipment. Other facilities to be used in the Commercial Plant operations will include the X-3012 Process Support Building, X-7726 Centrifuge Training and Test Facility, X-7727H Transfer Corridor, and X-7725 Recycle and Assembly Building. The X-3012 will provide oversight and control of the equipment in the cascade and also provides offices, lockers, change rooms, and break rooms. The X-7726 provides area to receive and test centrifuge components, and assemble and repair centrifuges. The X-7725 performs the same functions as the X-7726 only on a larger scale and provides administrative facilities, training rooms, and the storage and maintenance areas for the intra-plant transporter. An intra-plant transporter moves centrifuge machines between the X-7725 or the X-7726 to the X-3001 or X-3002 through the covered and environmentally controlled X-7727H. In addition to these facilities, USEC provides support facilities for the Commercial Plant. A Feed and Toll Transfer Facility, and Product and Tails Withdrawal Facility will be refurbished/constructed adjacent to the Process Buildings. Some areas and facilities described here and depicted in Attachment 1 are owned by the DOE and would be leased by USEC. USEC is also evaluating, as part of the Environmental Report, the siting and operation of additional capacity directly south of the existing process buildings (depicted in green in Attachment 1). New building(s) that would house the centrifuges would approximately double the SWU capacity of the facility.

The consulting party recommended by NRC for this action is the Ohio State Historic Preservation Office (SHPO). The proposed action is within the previously disturbed area of the PORTS reservation. In addition, the proposed action is within areas disturbed during construction of the GCEP facility; therefore, should not result in any additional impact to Native American Indian tribal, religious, or cultural sites.

An Environmental Report for this action is being prepared in accordance with the requirements of 10 CFR 51.45. Documentation of Consultations will be included in the USEC Environmental Report for the American Centrifuge Commercial Plant.

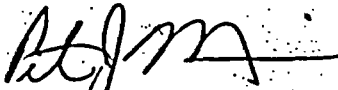
USEC has determined that the proposed action would not have adverse effects on historical resources included or eligible for inclusion in the National Register of Historic Places (National Register). The proposed action would result in utilizing the existing DOE GCEP facilities consistent with the original intent of gas centrifuge enrichment when the facilities were constructed in the early 1980s. The proposed action would not impact the historical integrity of the PORTS reservation.

Mr. Mark Epstein  
November 12, 2003  
Page 3 of 4

Information contained in Attachment 1 is considered proprietary to USEC and is requested to be withheld from public disclosure.

If you need further information on this proposed action, please do not hesitate to call me at 740-897-2710 or Greg Fout at 740-897-3823.

Sincerely,



Peter J. Miner  
Regulatory Manager

**Attachments**

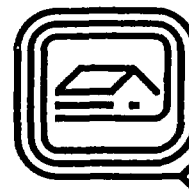
cc/att:

Kelly Coriell  
Greg Fout  
T. J. Justice, Governor's Economic Development Office  
James Morgan  
Mario Robles  
Carol O'Claire, Ohio Emergency Management Agency  
File - RO-390-03-004E

## Ohio Historic Preservation Office

567 East Hudson Street  
Columbus, Ohio 43211-1030  
614/ 298-2000 Fax: 614/ 298-2037

Visit us at [www.ohiohistory.org](http://www.ohiohistory.org)



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January 28, 2004

Peter J. Miner  
USEC, Inc.  
6903 Rockledge Drive  
Bethesda, MD 20817-1818

Re: Installation and Operation of the American Centrifuge Commercial Plant  
Portsmouth Gaseous Diffusion Plant (PORTS), Pike County, Ohio

Dear Mr. Miner,

This is in response to correspondence from your office, dated November 12, 2003 (received November 14) regarding the above referenced project. The comments of the Ohio Historic Preservation Office (OHPO) are submitted in accordance with provisions of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470 [36 CFR 800]); the Department of Energy serves as the lead federal agency.

Additional information is needed for us to complete our review of this project. The project will involve conversion of series of buildings to locate equipment for the centrifuge operation. This operation is connected to the proposed gas diffusion Lead Cascade facility. The centrifuge operation will use several existing buildings, including X-3001, X-3002, X-7726, X-3012, and X-7725. It is stated that these buildings were previously part of the Gas Centrifuge Enrichment plant that operated in the early 1980s. One of the features giving significance to PORTS is the large scale operation comprising the gaseous diffusion plant. Based on the information provided in the correspondence, it does not appear that the buildings to be modified contain equipment that formed an integral part of the gaseous diffusion operation. It also appears that that the buildings to be modified are of somewhat different style and function, and scale than the main buildings that make up the core of the Portsmouth Gaseous Diffusion Plant property. However, the correspondence also indicates that the centrifuge operation also proposes the construction of a new building. We believe that the construction of a new building has the potential to introduce a new element that has the potential to adversely affect this historic property. Please evaluate the potential for the new building, if constructed, to adversely affect the historic property and include this evaluation in your finding [36 CFR 800.5].

Any questions concerning this matter should be addressed to David Snyder at (614) 298-2000, between the hours of 8 am. to 5 pm. Thank you for your cooperation.

Sincerely,

David Snyder, Archaeology Reviews Manager  
Resource Protection and Review

DMS/ds (OHPO Serial Number 999162)

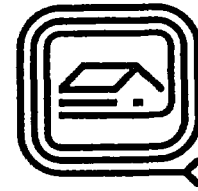
xc: Gary S. Hartman, DOE - Oak Ridge, P.O. Box 2001, Oak Ridge, TN 37831  
Kristi Wiehle, U.S. Department of Energy, PORTS, P.O. Box 700, Piketon, OH 45661



## Ohio Historic Preservation Office

567 East Hudson Street  
Columbus, Ohio 43211-1030  
614/ 298-2000 Fax: 614/ 298-2037

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May 20, 2004

Peter J. Miner  
USEC, Inc.  
6903 Rockledge Drive  
Bethesda, MD 20817-1818

Re: Installation and Operation of the American Centrifuge Commercial Plant  
Portsmouth Gaseous Diffusion Plant (PORTS), Pike County, Ohio

Dear Mr. Miner,

This is in response to correspondence from your office dated March 2, 2004 (received March 5) regarding the above referenced project. The comments of the Ohio Historic Preservation Office (OHPO) are submitted in accordance with provisions of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470 [36 CFR 800]); the Department of Energy serves as the lead federal agency.

Your correspondence offers the position that the proposed new construction will include buildings of similar design and size to the nearby buildings and that there will be similar functions carried out in these new buildings. Although not specifically stated in your correspondence, it appears that your discussion is to conclude that the qualities and characteristics that make PORTS significant will not be diminished by the proposed new construction. While we believe that clarification of those qualities that make PORTS significant would be helpful, given the available information on the size, design, and function of the existing and the proposed buildings, we are able to offer our opinion that the proposed project will not adversely affect the Portsmouth Gaseous Diffusion Plant historic property.

As you are aware, private citizens have raised concerns about the potential for this project to affect historic properties, including prehistoric archaeological sites. The National Historic Preservation Act strongly encourages federal agencies to include comments and concerns from the public throughout the Section 106 review process. It is our understanding the area of proposed new construction has been previously severely disturbed by previous construction, that the topsoil in this area was removed to a depth well into the subsoil and the contours were completed regraded during previous construction. However, we believe that it is an important responsibility to listen carefully to public concerns and to provide thoughtful and sensitive responses.

Any questions concerning this matter should be addressed to David Snyder at (614) 298-2000, between the hours of 8 am. to 5 pm. Thank you for your cooperation.

Sincerely,

Mark J. Epstein, Department Head  
Resource Protection and Review

MJE:DMS/ds (OHPO Serial Number 100903)

xc: Gary S. Hartman, DOE - Oak Ridge, P.O. Box 2001, Oak Ridge, TN 37831



November 12, 2003

Dr. Mary Knapp  
Field Supervisor  
U.S. Fish and Wildlife Service  
6950-H American Parkway  
Reynoldsburg, Ohio 43068-4127

**CERTIFIED MAIL**  
7001 1940 0007 8210 8493

**Informal Consultation Under Section 7 of the Endangered Species Act for the Proposed Installation and Operation of the American Centrifuge Commercial Plant at the Portsmouth Gaseous Diffusion Plant in Piketon, Ohio**

USEC Inc. (USEC) is preparing an Environmental Report (ER) in accordance with 10 *Code of Federal Regulations* (CFR) 51.45 for the proposed use of several former U.S. Department of Energy (DOE) Gas Centrifuge Enrichment Plant (GCEP) buildings, associated parking areas, and pedestrian/vehicle portals on the DOE Portsmouth Gaseous Diffusion Plant (PORTS) reservation. USEC proposes to construct and operate the American Centrifuge Commercial Plant, a uranium enrichment facility that would produce 3.5 million separative work units (SWU) using centrifuge technology. The enriched uranium is sold for use in nuclear power plants to generate electricity. This site is one of two under consideration by USEC for the American Centrifuge Commercial Plant. A siting decision has not been made; but is expected later this calendar year.

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The proposed action would result from locating the Commercial Plant at the site of the former DOE GCEP and the existing site of the American Centrifuge Lead Cascade Facility. The GCEP facilities, located within DOE's PORTS reservation were built in the early 1980s. The GCEP program was terminated in 1985.

The GCEP facilities are adjacent to the existing gaseous diffusion plant, which ceased uranium enrichment operations in May 2001. Currently, the primary uses of the GCEP facilities are

waste storage, warehouse activities, office and locker areas for support functions for the DOE. Upon NRC issuance of a license next year, the Lead Cascade Facility will be allowed to operate up to 240 centrifuge machines in the recycle mode as a "closed loop" system.

The Commercial Plant would utilize two existing process buildings (i.e., X-3001 and X-3002) filled with centrifuge machines in a cascade arrangement to produce 3.5 million SWU of enriched uranium <sup>235</sup>U. The two process buildings will house the centrifuge machines, associated process piping, instrumentation and controls, computer systems, and auxiliary support equipment. Other facilities to be used in the Commercial Plant operations will include the X-3012 Process Support Building, X-7726 Centrifuge Training and Test Facility, X-7727H Transfer Corridor, and X-7725 Recycle and Assembly Building. The X-3012 will provide oversight and control of the equipment in the cascade and also provides offices, lockers, change rooms, and break rooms. The X-7726 provides area to receive and test centrifuge components, and assemble and repair centrifuges. The X-7725 performs the same functions as the X-7726 only on a larger scale and provides administrative facilities, training rooms, and the storage and maintenance areas for the intra-plant transporter. An intra-plant transporter moves centrifuge machines between the X-7725 or the X-7726 to the X-3001 or X-3002 through the covered and environmentally controlled X-7727H. In addition to these facilities, USEC provides support facilities for the Commercial Plant. A Feed and Toll Transfer Facility, and Product and Tails Withdrawal Facility will be refurbished/constructed adjacent to the Process Buildings. Some areas and facilities described here and depicted in Attachment 1 are owned by the DOE and would be leased by USEC. USEC is also evaluating, as part of the Environmental Report, the siting and operation of additional capacity directly south of the existing process buildings (depicted in green in Attachment 1). New building(s) that would house the centrifuges would approximately double the SWU capacity of the facility.

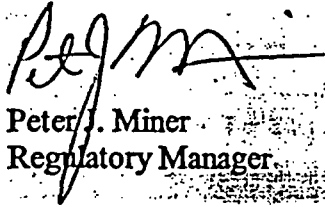
This letter is intended to serve as informal consultation under Section 7 of the *Endangered Species Act*. In this regard, USEC requests an updated list of protected species and habitats on the PORTS reservation and solicits your recommendations and comments about the potential effects of this proposed action. Documentation of your Consultation will be included in the USEC Environmental Report for the American Centrifuge Commercial Plant.

Dr. Mary Knapp  
November 12, 2003  
Page 3 of 4

Information contained in Attachment 1 is considered proprietary to USEC and is requested to be withheld from public disclosure.

If you need further information on this proposed action, please do not hesitate to call me at 740-897-2710 or Greg Fout at 740-897-3823.

Sincerely,



Peter J. Miner  
Regulatory Manager

**Attachments**

cc/att:

Kelly Coriell

Greg Fout

T. J. Justice, Governor's Economic Development Office

James Morgan

Mario Robles

Carol O'Claire, Ohio Emergency Management Agency

File - RO-390-03-001E



# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

Ecological Services  
6950 Americana Parkway, Suite H  
Reynoldsburg, Ohio 43068-4127  
(614) 469-6923  
Fax: (614) 469-6919

June 21, 2004

Mr. Peter J. Miner  
C/O Mr. Greg Fout  
P.O. Box 628, MS-9030  
Piketon, Ohio 45661

Re: American Centrifuge Commercial Plant, Federally Listed Species

Dear Mr. Miner:

This is in response to your facsimile received in our office on June 6, 2004, transmitting a letter originally dated November 12, 2003. In this letter, you request an updated list of Federally endangered and threatened species potentially present in the project area, and comments regarding potential effects of the proposed action. USEC proposes to use several former U.S. DOE Gas Centrifuge Enrichment Plant buildings, associated parking areas, and pedestrian/vehicle portals on the Portsmouth Gaseous Diffusion Plant (PORTS) reservation to construct and operate the American Centrifuge Commercial Plant. The plant would be used to enrich uranium for use in nuclear power plants. The proposed project site is the PORTS reservation, located in Piketon, Pike County, Ohio.

There are no Federal wilderness areas, wildlife refuges, or designated Critical Habitat within the vicinity of the proposed site.

The Service is concerned with possible pollution resulting from construction and operation of the proposed facility. Operation of the now-closed PORTS facility caused contamination of soil, groundwater, and nearby streams with volatile organic compounds, metals, PCBs, and radionuclides. The Service is concerned that the American Centrifuge Commercial Plant may contribute additional toxics to the environment surrounding the PORTS reservation. We recommend that contamination of the surrounding landscape with radionuclides and other toxic materials be prevented using the best available technology.

**LISTED SPECIES COMMENTS:** The proposed project lies within the range of the Federally endangered Indiana bat (*Myotis sodalis*). Summer habitat requirements for the species are not well defined but the following are thought to be of importance:

1. Dead or live trees and snags with peeling or exfoliating bark, split tree trunk and/or branches, or cavities, which may be used as maternity roost areas.
2. Live trees (such as shagbark hickory) which have exfoliating bark.
3. Stream corridors, riparian areas, and upland woodlots which provide forage sites.

Should the proposed site contain trees exhibiting any of the characteristics listed above, we recommend that they and surrounding trees be saved wherever possible. If they must be cut, they should not be cut between April 15 and September 15.

If desirable trees are present and if the above time restriction is unacceptable, mist net or other surveys should be conducted to determine if bats are present. The survey should be designed and conducted in coordination with the endangered species coordinator for this office. The survey should be conducted in June or July since the bats would only be expected in the project area from approximately April 15 to September 15.

**SPECIES OF CONCERN:** The project lies within the range of the timber rattlesnake (*Crotalus horridus horridus*), a large shy rattlesnake that is declining throughout its national range. No Federal listing status has been assigned to this species. Instead, the U.S. Fish and Wildlife Service has initiated a pre-listing Conservation Action Plan to support state and local conservation efforts. Your proactive efforts to conserve this species now may help avoid the need to list the species under the Endangered Species Act in the future. The timber rattlesnake is protected throughout much of its range and listed as endangered by the State of Ohio. Due to their rarity and reclusive nature, we encourage early project coordination to avoid potential impacts to timber rattlesnakes and their habitat.

In Ohio, the timber rattlesnake is restricted to the un-glaciated Allegheny Plateau and utilizes the specific habitat types, depending upon season. Winters are spent in dens usually associated with high, dry ridges. These dens may face any direction, but southeast to southwest are most common. Such dens usually consist of narrow crevices in the bedrock. Rocks may or may not be present on the surface. From these dens, timber rattlesnakes radiate throughout the surrounding hills and move distances as great as 4.5 miles. In the fall, timber rattlesnakes return to the same den. Intensive efforts to transplant timber rattlesnakes have not been successful. Thus protection of the winter dens is critical to the survival of this species. Some project management ideas include the following:

- 1) At a minimum, project evaluations should contain delineations of timber rattlesnake habitat within project boundaries. Descriptions should indicate the quality and quantity of timber rattlesnake habitat (den sites, basking sites, and foraging area, etc.) that may be affected by the project.
- 2) In cases where timber rattlesnakes are known to occur or where potential habitat is rated moderate to high, timber rattlesnake surveys may be necessary. If surveys are to be conducted, it may be helpful to inquire about timber rattlesnake sightings with local resource agency personnel or reliable local residents. In addition, local herpetologists may have knowledge of historical populations as well as precise knowledge of the habits, and especially the specific, local types of habitats that may contain timber rattlesnakes. Surveys should be performed during the periods of spring emergence from dens (usually a narrow window in April or May) and throughout the active season until October. The species is often easiest to locate during the summer months when pregnant females seek open areas in early morning, especially after cool evenings.
- 3) In portions of projects where timber rattlesnakes will be affected, clearing and construction activities should occur at distances greater than 100 feet from known dens. Most importantly, tops of ridges and areas of exposed rock should be avoided.
- 4) In areas where timber rattlesnake dens are known or likely to exist, maintenance activities (mowing, cutting, burning, etc.) should be conducted from November 1 to March 1, when timber rattlesnakes are hibernating.

Should additional information on listed or proposed species or their critical habitat become available or if new information reveals effects of the action that were not previously considered, this determination may be reconsidered. If project plans change or if portions of the proposed project were not evaluated, it is our recommendation that you contact our office for further review.

This technical assistance letter is submitted in accordance with provisions of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C.661 et seq.), the Endangered Species Act of 1973, as amended, and is consistent with the intent of the National Environmental Policy Act of 1969, and the U.S. Fish and Wildlife Service's Mitigation Policy.

If you have questions, or if we may be of further assistance in this matter, please contact Jeromy Applegate at extension 21 in this office.

Sincerely,



for Mary Knapp, Ph.D.  
Supervisor

cc: ODNR, DOW, SCEA Unit, Columbus, OH