

Digital Decommissioning

AI, Data Lakehousing and Web Technologies for Charting Nuclear Permitting Reviews

October 31, 2024

Anastasia Bernat

Data Scientist



PNNL is operated by Battelle for the U.S. Department of Energy







U.S. Evolving Nuclear-Tech and its Nuclear Permit-Scape

Climate Solutions Weather

Climate / Solutions

The US is dismantling nuclear warheads to power the next generation of reactors

Ella Nilsen, CNN 5 minute read · Updated 1:41 PM EDT, Mon September 9, 2024 WORLD U.S. ELECTION 2024 POLITICS SPORTS ENTERTAINMENT Sean 'Diddy' Combs Bath & Body Works apology

1st small modular nuclear reactor certified for use in US

Nuclear permitting is an expensive, complex, and technologically reactive process.



Bill Gates at the groundbreaking for TerraPower's nuclear power plant near Kemmerer, Wyoming, in June. Benjamin Rasmussen/The New York Times/Redux

April 29, 2024 May 30.











Proposed amendments to cleanup agreements to go out for 60-day public comment period

October 31. 2024

MENU

Proactive Environmental and Nuclear Safety By Integrating AI in Permitting Reviews

Canda: Environmental Assessment Act

Pacific

Northwest

United States: National Environmental Policy Act Sweden: Environmental Code

Zambia:

Environmental

Management Act

India: Environment Protection Act

Screening of pre-application reviews and **fast scoping of safety** guidance to resolve potential issues early in the licensing process.



Al-enhanced search, chat, and analytics to more efficiently retrieve insights from existing permitting documents and inform development of future documents. Potentially adaptable to other collections of large, technical, and unstructured data (e.g., ADAMS or PHOENIX).



Greater efficiency and consistency processing and summarizing **public comments** using AI-powered comment processing applications that leverage historical comment summary and response data.

Ecuador: Organic Code on the Environment

Australia: Environment Protection Act



Improve, centralize, and **select** reactor designs that produce shorter decommissioning timelines.



Streamline and harmonize decision-making on environmental **impact assessments** to chart significant impacts when building or decommissioning a reactor in critical areas of radioactive waste management, site characterization and restoration, and more.



Al and Digital Tools for Streamlined U.S. NEPA **Permitting Reviews** The U.S. Department of Energy (DOE) has TIONS

NATIONAL ENVIRONMENTAL POLICY ACT OF 1969

[Public Law 91–190] [As Amended Through P.L. 118–5, Enacted June 3, 2023]

- "... a unified permitting portal that would-
 - (1) allow applicants to-
 - (A) submit required documents or materials for their project in one unified portal:
 - (B) upload and collaborate with the applicable agencies to edit documents in real-time, as required;
 - (C) upload and display visual features such as video, animation, geographic information system displays, and three-dimensional renderings; and
 - (D) track the progress of individual applications;

(2) include a cloud based, digital tool for more complex reviews that would enhance interagency coordination in consultation by—

- (A) centralizing, across all necessary agencies, the data, visuals, and documents, including but not limited to geographic information system displays, other visual renderings, and completed reports and analyses necessary for reviews;
- (B) streamlining communications between all necessary agencies and the applicant;
- (C) allowing for comments and responses by and to all necessary agencies in one unified portal;
- (D) generating analytical reports to aid in organizing and cataloguing public comments; and
- (E) be accessible on mobile devices:

(3) **boost transparency in agency processes** and present information suitable for a lay audience, including but not limited to-

- (A) scientific data and analysis; and
- (B) anticipated agency process and timeline; and

energy demand.

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These actions include coordination with regulators, researchers, utilities, clean energy developers, data center owners and operators, and other interested parties.

Ø EN	IERGY
N.	
	Al for Energy
	Opportunities for a Modern Grid and Clean Energy Economy
	April 2024

D	OE	20	24



https://www.energy.gov...

PORTA ш L Z LL N ENTRAL 0



announced many actions to assess opportunities and challenges of AI for purposes of accelerating deployment of clean energy and managing growing





https://www.pnnl.gov...

PolicyAI: AI for Streamlining, Centralizing, and Augmenting Permitting Reviews



Pacific

Northwest



Safety

Safety Review

Safety Analysis Report (SAR): Analysis of facility safety, such as potential hazards, accident scenarios, and safety measures.

Decommissioning Plan (DP): Methods for decommissioning, including safety protocols and waste management

Radiological Assessment Reports: Documents assessments of radiation levels, potential exposures, and strategies for minimizing risk during decommissioning

PolicyAI: AI for Streamlining, Centralizing, and Augmenting Permitting Reviews

often carried out, so communities have

opportunities to provide input.



permitting processes and information to the public

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Safety



What disposal challenges were introduced that could persist if a new reactor is built in Washington State?

How does building a new reactor impact community economies and energy demand in the Pacific Northwest?

What are major topic areas described by public comments submitted to the latest decommissioning project?

What site characteristics would influence reactor design if building a reactor in California State?



PolicyAl Thrust Areas



User Discovery and Rapid Application Development

Document Search (SearchNEPA)

Comment Analysis

Drafting Assistant

and more to come



Pacific

Northwest

Management, and Governance Optimize processing and storage of permitting documents in an Alcompatible format

compatible format (i.e., NEPATEC dataset)

Data

Data Collection,

Standardization,

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Forest Service



Final Environmental Impact Statement for the Land Management Plan

Tonto National Forest

Volume 1: Chapters 1 to 3

Coconino, Gila, Maricopa, Pinal, and Yavapai Counties, Arizona





5,220,940

3,839,837,482 MAX: 33,220,133/document

*and growing

July 2022



Environmenta Review	Categorica (CE): No an significant i	al ExclusionEnvirnticipated(EA):mpact.is need	conmental Assessment Used to assess if an EIS eded.	Environmental Impact Statement (EIS For significant impacts—detailed analys and public involvement required
Approximate Page Leng	th 1 to 10		10 to 100	200 to 1,000+
	<page-header><section-header><section-header><text><text><text><text><text><text><text><text><text></text></text></text></text></text></text></text></text></text></section-header></section-header></page-header>	Displayment leinement Imput Statumet - Depleid Urainen Oxfe TARLE OF CONCENT 1 Indiagenese Internetion 1.1 Indiagenese Internetion 1.1 Indiagenese Internetion 1.2 Indiagenese Internetion 1.3 Dependent Oppleid Urainen Oxfe Statement 1.4 Indiagenese Internetion 1.5 Dependent Oppleid Urainen Oxfe Statement 1.6 Dependent Oppleid Urainen Oxfe Statement 1.7 Dependent Oppleid Urainen Oxfe Statement 1.8 Dependent Oppleid Urainen Oxfe State 1.9 Oppleid Urainen Oxfe Statement 1.1 Dependent Oppleid Urainen Oxfe Statement 1.2 Dependent Oppleid Urainen Oxfe Statement 1.3 Dependent Oppleid Urainen Oxfe Statement 1.4 Dependent Oppleid Urainen Oxfe Statement 1.3 Londmiss Of Oppleid Urainen Oxfe Statement 1.4 Dependent Oppleid Urainen Oxfe Statement 1.5 Dependent Oppleid Urainen Oxfe Statement 1.6 Dependent Oppleid Urainen Oxfe Statement 1.1 Contamiss Of Oppleid Urainan Oxfe State Statement 1.2<	<section-header><section-header><text><section-header><text><text><text><text></text></text></text></text></section-header></text></section-header></section-header>	A Construction of the Construction of
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Figure 2-1 Location of the Paducah Site (Source: Modified from PPPO 2018 DESCRIPTION OF RELATED ACTIVITIES AT PADUCAH AND

Pacific Northwest

Maps



Images

Figures/Plots

2.1.2 Quantities of Depleted

ated in the 2004 EISs. At that time, th

Long Tables

isposal of Waste at EnergySolutions

s near Clive, Utah, w

~ .	of			01 MILLING 8	(per cylin	der per year)
Sac	Cylinders	(Years)	Controlled Corrosion	Uncontrolled Corrosion	Controlled Corresion	Uncontrolled Corresion
adacah	36,191	40	36	444	2.49×10 ³	3.07×10 ⁻⁴
ortsmouth	16,109	40	16	74	2.48×10 ³	1.15×10 ⁻⁴
TTP	4,822	40	7	213	3.63×10 ⁻³	1.10×10 ⁻⁵
ortsmouth and TTP	20,931	NA-	23	287	NA	NA

Medium Tables Short Tables



deted Uranium Oxida

stant Emissions (tons/year)				
PMIN	PM2.4	SO,	VO	
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0.00	0.00	0.00	0.0	
0.09	0.00	0.00	0.0.	
0.01	0.01	0.01	0.0	
0.01	0.01	0.01	0.03	
0.03	0.03	0.01	0.0-	
0.07	0.07	0.00	0.21	
0.07	0.07	0.00	0.21	
0.14	0.13	0.01	0.4.	
0.30	0.29	0.15	0.43	
0.36	0.35	0.18	0.54	
0.65	0.63	0.33	0.9	
0.01	0.01	0.00	0.0	
0.01	0.01	0.00	0.0	
0.01	0.01	0.00	0.0-	
0.05	0.05	0.02	0.01	
0.05	0.06	0.03	0.0	
0.11	0.11	0.05	0.1	
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0.19	0.18	0.09	0.21	
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0.33	0.32	0.17	0.5.	
0.03	0.03	0.00	0.14	
0.03	0.02	0.00	0.0	
0.06	0.05	0.00	0.1	
0.28	0.28	0.14	0.43	
0.25	0.24	0.13	0.31	
0.54	0.52	0.27	0.8.	
0.05	0.04	0.00	0.14	
0.03	0.03	0.00	0.0	
0.08	0.07	0.00	0.2.	
0.30	0.29	0.15	0.4	
0.22	0.22	0.11	0.34	
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1.05	1.02	0.53	1.5	



Extraction: Maps and Figures of NEPA Documents



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U.S. Operating Commercial Nuclear Power Reactors



Figure 3-1. Map of NRC Regions Showing Locations of Operating Reactors (NRC 2013b)



Water Reactors and (b) Boiling Water Reactors (NRC 1997a

Figure 2–1. Single-Shell Tanks Under Construction at the

Figure 3-5 Nevada National Security Site Location



Figure 3-6 Nevada National Security Site Area 5 Radioactive Waste Managem Complex (Source: DOE 2013a)



Figure 3-4 EnergySolutions Disposal Facilities (Source: ES 2015a)39





Hanford Site, 1947–1948

Extraction and Enrichment: Text of NEPA Documents Enrichment via LLM

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PDF Corpus ↓	PNNL Mass File Transfer	Agency Data Platform	Web Scraping	Er Ca
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Document Data Extraction	PyMuPDF (Fast, Cheap)	Unstructured IO (Slow, Cheap)	LLaMA-Parse (Fast, Expensive)	cc Ti
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ou are a helpful assistant, and your role is to identify the structure and layout of the following National nvironmental Policy Act (NEPA) document. Background:

ategorical exclusions are categories of actions that a federal agency has determined, in its NEPA procedures, ormally do not have a significant effect on the human environment and for which, therefore, neither an nvironmental assessment nor an environmental impact statement normally is required. CE determination is the application of one or more CEs to a particular project or group of projects. Your task is to onvert the text of the document into a structured JSON document with the fields of Program or Field Office, Project itle, Location, Proposed Action and the Categorical Exclusion(s) Applied.

"Program or Field Office": "U.S. Department of Energy (DOE) Office of Legacy Management M)".

Project Title": "Administrative Actions, Routine Operations, and Maintenance Activities at ne Tuba City, Arizona, Disposal Site",

_ocation": "Tuba City, Arizona, Disposal Site",

Proposed Action or Project Description": "LM is proposing to conduct administrative actions, outine operations, and maintenance activities at the Tuba City, Arizona, Disposal Site. oposed activities would include, but would not be limited to: administrative functions such preparation of inspection reports and work planning documents; routine operations such as nitoring, conducting surveys, and calibration of existing telemetry equipment and nstrumention; and maintenance activities such as maintaining existing on-site groundwater Ils and associated infrastructure and vegetation management.",

ategorical Exclusion(s) Applied": ["A1 Routine DOE Business Actions", "A9 Information Athering, Analysis, and Dissemination", "A12 Emergency Preparedness Planning", "B1.3 Routine intenance", "B1.7 Electronic Equipment", "B1.15 Support Buildings", "B1.19 Microwave, eteorological, and Radio Towers", "B1.26 Small Water Treatment Facilities", "B1.33 Stormwater noff Control", "B2.1 Workplace Enhancements", "B2.2 Building and Equipment Instrumentation", 32.3 Personnel Safety and Health Equipment", "B2.5 Facility Safety and Environmental nprovements", "B3.1 Site Characterization and Environmental Monitoring", "B5.1 Actions to onserve Energy or Water", "B5.2 Modifications to Pumps and Piping", "B5.4 Repair or eplacement of Pipelines", "B5.12 Workover of Existing Wells", "B5.16 Solar Photovoltaic stems", "B6.1 Cleanup Actions"] }



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From PDF to An Al-Ready Dataset (NEPATEC1.0)



Metadata

- Number of Pages: 454
- Agency: DOE
- **Document Version: Final**
- Project Process: EIS •
- Location: Alaska .

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"text": "COVER SHEET \nResponsible Federal Agency: U.S. Department of Energy (DDE) \nCooperating Agency \nTitle: Final Supplemental Environmental Impact Statement for the Alaska LNG Project \n(DOE/EIS-@512-S1) NLocation: North Slope, Alaska \nContact: \nFor further information about this Supplemental \nEnv ent, contact: \nFor general information on the DOE process for \nimplementing the National I Act. \n(NEPA) contact: \nMark Lusk, NEPA Compliance Officer \nU.S. Department of Energy \nNational Energy Techn ratory \n3610 Collins Ferry Road \nMorgantown, WV 26505 \n(304) 285-4145 or Mark.Lusk@NETL.DOE.GOV \nBrian ector \nOffice of NEPA Policy and Compliance (GC-54) \nH.S. Department of Energy \n1000 Indep ngton, DC 20585-0103 \n(202) 586-4800 or Brian.Costner@hg.doe.gov \nAbstract: epartment of Energy (DDE) prepared this Final Supplemental Environmental Impact Statement \n(SEIS) to evaluate nmental impacts associated with natural gas production on the North \nSlope of Alaska (North Slo and life cycle greenhouse gas emissions associated with authorizing Alaska \nLNG Project LLC (Alaska LNG) to expo efied natural gas (LNG) as part of the Alaska Gasline \nDevelopment Corporation\u2019s proposed Alaska LNG roject (Project). DOE is in the process of rehearing \nDOE/Office of Fossil Energy Order No. 3643-A issued in Augu 2020 (Alaska LNG Order), which \nauthorized export of LNG to non-Free Trade Agreement SEIS supplements in the Final Environmental Impact Statement published by the Federal Energy Regulatory Commission ted by DOE (DOE/EIS-0512) on March 16, 2020, and will support DOE\u2019s decision mpletion of the National Environmental Policy Act (NEPA) process. DOE intends to issue an \norder under Section a) of the Natural Gas Act in which DOE may exercise its authority to reaffirm, \nmodify, or set aside the Alask Order. \nDOE prepared this Final SEIS in accordance with the National Environmental Policy Act of 1969 \n(4 ited States Code 4321 et seq.) and in compliance with the Council on Environmental Quality \ gulations (Title 40 Code of Federal Regulations [CFR] Parts 1500 to 1500) and DDE \nNEPA procedures (10 CFR 1021 This Final SEIS evaluates the potential env. mental impacts \nassociated with natural gas production in the Nor Slope and includes a life cycle analysis calculating the \ngreenhouse gas emissions for LNG exported from the roposed Alaska LNG Project. \nComment Period: \nOm June 29, 2022, DOE published a Notice of Availability in the ederal Register announcing the \navailability of the Draft SEIS, presenting the date, time, and access informatio for a virtual public \nmeeting and initiating a 45-day public comment period that ran from July 1, 2022 until Augu: 15, \n2022 (Federal Register Volume 87, Number 124). DDE also placed notification advertisements in \nnewspapers, ent notification letters, placed hard copies of the Draft SEIS at libraries, and placed an \nelec the document on DOE\u2019s website. \n",

Text



Images

Structure

via LLM



Standardized Schema



Process Name

- > Document Title
- ➢ Version
- > Affected
- Environment
- > Dates
- Location
- Section Headings
- > Authors
- \succ Table of Content

AI-Ready Vector Databases and Database Pacific **Structure** Northwest NATIONAL LABORATORY





Apps/Co-Pilots/Digital Assistants



Fine-tune LLMs with NEPA knowledge and evaluate (e.g., NEPAQuAD benchmark)

If the Programmatic Environmental Impact Statement (PEIS) is intended to aid understanding and inform decision-making on environmental impacts associated with decommissioning, what might one infer about the importance of the PEIS in the decommissioning process?

Which model response do you prefer?

20 years?

Is Platform Habitat expected to be decommissioned within the next



regulations and DOI





Which Model? NEPAQuAD For Measuring Al **Model Accuracy** AI Chat (Access to varying levels of NEPA context from none to high)

20 years?

Answers (Access to internet)

Answer	No	

Pacific

Answer

Northwest NATIONAL LABORATORY





If the Programmatic Environmental Impact Statement (PEIS) is intended to aid understanding and inform decision-making on environmental impacts associated with decommissioning, what might one infer about the importance of the PEIS in the decommissioning process?

The PEIS is likely considered important in the decommissioning process as it helps to identify and evaluate potential environmental impacts and socioeconomic considerations which are essential for informed decisionmaking.

Model A

One can infer that the PEIS (Programmatic **Environmental Impact** Statement) plays a crucial role in the decommissioning process of offshore oil platforms in the Pacific OCS (Outer Continental Shelf). It serves as a comprehensive document that outlines the purpose and need for the proposed action, describes the proposed action and reasonable alternatives. and evaluates notential

From the context provided, one can infer that the Programmatic **Environmental Impact** Statement (PEIS) is of significant importance in the decommissioning process for several reasons: 1. **Regulatory Compliance**: The PEIS is prepared in accordance with CEQ regulations and DOI regulations implementing NEPA. This indicates that the PEIS is a critical component of the legal



NUREG-2157 Volumes 1 and 2 Generic Environmental Impact Statement for Continued Storage of 2 52

Seneric - Continued Storage of Spent Nuclear Fuel NUREG-2157

NUREG-1437 Volume 1 rev 2 draft for publication > 29 pages

SearchNEPA.ai

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nuclear

SearchNEPA V1.1.0

PNNL An official website enabled by the Pacific Northwest National Laboratory

> □ 10 pages

EIS

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Comment

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🖬 draft

🖬 final

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(+) Not Supplemental

 $\rangle \square 9$ pages

Pacific Northwest

Future Directions

Canda: Environmental Assessment Act Sweden: Code

United States: Al Access and High Performance At Low-Cost, Low-Risk, and Efficient Scales Management Act

> Ecuador: Organic Code on the Environment

Environmental

India: Environment

PolicyAl Timeline and Next Steps

Ongoing Improvements

- Continued collection and processing of existing NEPA documents
- Continued coordination with CEQ on a standardized data ontology for NEPA documents
- Fine-tune generative AI chat and summarization capabilities

Planned Future Enhancements

- Use AI to generate geospatial information from past projects for more detailed locational searches
- Develop analytics platform for multi-document statistical and trend analysis
- Develop public comment feature enabling precise comment placement within document, and rapid intake and summarization with AI

Timeline

Current status: Research and development, pilot and v1 applications, interagency agreements and feedback

1–2 years

Al-enabled pilots improving permitting workflows

5 years

Operationalized AI models streamlining permitting

October 31, 2024

20

Recommendations

REC 1: **Supporting** AI Access for Streamlining Reviews at Energy Efficient Scales

REC 2: **Standardizing** High Performance With More Democratized AI Models

REC 3: **Forums** on Global Reach in AI for Streamlining Environmental Permitting Reviews for Nuclear Safety A Big Tech company have costs that could run -4,000 times more every month than PolicyAl

Live updates: Election 2024

CLIMATE

Middle East wars

Puerto Rico

Amazon, Google make dueling nuclear investments to power data centers with clean energy

High Compute Cost Big Tech

Energy Secretary Jennifer Granholm to Big Tech: **"BYOP"** or **"bring your own power"** to the buildout of data centers.

Low Compute Cost PolicyAI

Capabilities are in-house but services are made to add new value to users like federal agents and the public.

Recommendations

REC 1: Supporting AI Access for Streamlining Reviews at Energy Efficient Scales

REC 2: Standardizing High Performance

With More Democratized AI Models

REC 3: Forums on Global Reach in Al for Streamlining Environmental Permitting Reviews for Nuclear Safety

Human-AI Decision Making

Recommendations

REC 1: **Supporting** AI Access for Streamlining Reviews at Energy Efficient Scales **Canda:** Environmental Assessment Act

REC 2: **Standardizing** High Performance With More Democratized AI Models

REC 3: **Forums** on Global Reach in AI for Streamlining Environmental Permitting Reviews for Nuclear Safety **United States**: National Environmental Policy Act

Zam

Ecuador: Organic Code on the Environment

Sweden: Environmental Code

> India: Environment Protection Act

Zambia: Environmental Management Act

Thank you

To learn more about our PolicyAl team, resources, and publications, visit <u>pnnl.gov/projects/policyai</u> or email us at <u>policyai@pnnl.gov</u>

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PNNL-SA-205211

October 31, 2024

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PNNL is operated by Battelle for the U.S. Department of Energy

PNNL An official website enabled by the Pacific Northwest National Laboratory

Can we turn millions of pages of past environmental reviews and permitting documents into accessible information to improve and streamline current reviews?

+

Home

Version 1.0

26

Semantic Search

Version 1.0

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PNNL An official website enabled by the Pacific Northwest National Laboratory SearchNEPA AI For U.S. Environmental And Permitting Reviews NUREG 2239 Draft Report for Environmental Impact Statement for Interim Storag... < 19 / 484 > - 119% + (> +) Q Comment BACKGROUND 2 :≡ n AGENCY 3 By letter dated April 28, 2016, the U.S. Nuclear Regulatory Commission (NRC) received an application from Waste Control Specialists, LLC (WCS) requesting a license to construct and AVAILABILITY OF **REFERENCE MATERIALS IN** operate a consolidated interim storage facility (CISF) for spent nuclear fuel (SNF) and NRC PUBLICATIONS Greater-Than-Class-C (GTCC) waste, comprised primarily of spent uranium-based fuel, along with a small quantity of spent mixed oxide (MOX) fuel (collectively referred to as SNF), at the COMMENTS ON DRAFT WCS site in Andrews County, Texas, for a 40-year period. On April 18, 2017, WCS requested REPORT that the NRC's review of its license application be suspended. On June 22, 2017, the NRC 9 ABSTRACT Commission, in Commission Order CLI-17-10, directed staff to re-open the environmental 10 Nuclear Regulatory Commission 11 impact statement (EIS) scoping period using established procedures if WCS requested that the > 3 DESCRIPTION OF THE NRC resume the review of the license application. 12 AFFECTED ENVIRONMENT . 3-1 13 By letter dated June 8, 2018, Interim Storage Partners, LLC (I' LOCATION 2 BACKGROUND Features and Orano CIS, LLC (a subsidiary of Orano USA), requested 14 the CISF license application under its new name, reflecting th 1 Impacts by Resource Area 15 With this request, ISP submitted a revised license application and CISF Stage 16 + United States 17 that included a revised Environmental Report (ER) and revise 11 Geology and Soils 18 The proposed ISP CISF would provide an option for storing S 1 Surface Waters and power reactors for a period of 40 years. ISP submitted the lic 19 with requirements in Title 10 of the Code of Federal Regulatic Wetlands 20 Requirements for the Independent Storage of Spent Nuclear 21 8 Groundwater Waste, and Reactor-Related Greater-Than-Class-C Waste. Au 22 **5** Ecological Resources 23 prepared this EIS consistent with the National Environmental Policy Act of 1969 (NEPA), NRC's NEPA-implementing regulations contained in 10 CFR Part 51, Environmental Protection 24 9 Socioeconomics Regulations for Domestic Licensing and Related Regulatory Functions, and the NRC staff's 25 E Leafle 6 Environmental Justice 26 guidance in NUREG-1748, "Environmental Review Guidance for Licensing Actions Associated Texas with NMSS Programs." > 1 INTRODUCTION 27 PROJECT > 2 PROPOSED ACTION AND 28 The proposed action is NRC's issuance, under the provisions of 10 CFR Part 72, of a license **ALTERNATIVES** 29 authorizing the construction and operation of the proposed ISP CISF in Andrews County, Texas. for a period of 40 years. The proposed project area is situated approximately 0.6 kilometers > 1 Alternatives Eliminated 30 Environmental Impact Statement for Interim from Detailed Analysis (km) [0.37 mile (mi)] east of the Texas and New Mexico State boundary. 31 Storage Partners LLC¿s License Application > 13 Comparison of Predicted 32 ISP requests authorization for the proposed project to store 5,000 metric tons of uranium for a Consolidated Interim Storage Facility for **Environmental Impacts** 33 (MTUs) [5,500 short tons] of SNF from decommissioned and decommissioning reactor sites, as Spent Nuclear Fuel in Andrews County, Texas 1 Preliminary 34 well as from operating reactors prior to decommissioning for a 40-year license period ISP

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Project View page with GenAI summary

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A permitting schedule showing permits and progress associated with the project

A floating, document "timeline" that can be expanded into a table or Gantt chart of all the documents

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GenAl integration for "chatting" with the document

Comment Analysis

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This correspondence document contains quotes that will be used to populate a NEPA scoping summary report. That report will be organized by resources areas (e.g., Environmental Justice, NEPA Policy, Air Quality). With that in mind, I need this correspondence to be broken into discrete delineated quotes by NEPA-relevant resource areas. All narrative content should be delineated, and if a quote does not fit any category, list that quote at the beginning under the heading "Not Applicable". The content should be formatted as a table where column 1 would have a relevant category, column 2 the name of the commenter (if known), and column 3 would contain the guote from the correspondence that fits in that section. The table should be sorted in the order comments appear in the correspondence. The scoping summary report we're writing includes the following sections, separated by semicolons: Postulated Accidents; Alternative - No-Action; Alternatives - Replacement Power; Environmental Justice; Geologic Environment; Greenhouse Gas Emissions and Climate Change; Historic and Cultural Resources; Human Health - Microbiological Hazard; Human Health - Radiological; Hydrology; Meteorology and Air Quality; Socioeconomics; Uranium Fuel Cycle; Waste Management - Radioactive Waste; General Comment: comments general in nature that do not convey significant information for environmental review; NRC Review Process NEPA, 10 CFR 51, and 10 CFR 54; Emergency Preparedness; Peripheral or Outside of Scope Miscellaneous; Aging Management; Safety; Security and Terrorism; Energy Costs; Need for Nuclear Power.

Here is the correspondence reformatted into a table with columns for category, commenter name, and quote, sorted by the order the quotes appear in the document and categorized under relevant NEPA resource areas:

Category	Commenter Name	Quote
Waste Management - Radioactive Waste		Further, these containers, designed only for temporary storage, had been used for storage for up to 14 years. Though this incident appeared in the Environmental Assessment, WEC's failure to disclose the site and existing contamination showed lack of attention to proper site management and disclosure.
Waste Management - Radioactive Waste		Intermodal containers. The damaged and leaking trailers and their contents are currently being remediated under the Southern Storage Area Operable Unit Intermodal Container Work Plan, details of which appear in the Final Interim Remedial Investigation Summary Report developed as part of Westinghouse's February 2019 Consent Agreement with SCDHEC. Under the negotiated work plan, Westinghouse has been required to test soil underneath the containers for radionuclides, empty the containers of their barrels, properly dispose of the barrels and their contents, and ship the containers off-site (some as low-level radioactive waste). Contaminated soil beneath the containers was removed and subsequent tests found no further evidence of contamination.
NRC Review Process NEPA		Unfortunately, the Communications Protocol prepared as part of the Consent Agreement leaves too many reporting decisions to WEC's discretion. Given WEC's history, we are not confident that future incidents will be disclosed in a timely manner. We request that the Communications Protocol be revisited as part of the Environmental Impact Statement.

Prompt

Result

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 Experimentation with copilot applications to bracket, categorize, and summarize comments by subject matter

Developing experimental design to test AI performance through retrospective comparison to human-prepared comment analyses

Risk-informed human decision making, validation of results, information security, and transparency remain paramount

Thank you

To learn more about our PolicyAl team, resources, and publications, visit <u>pnnl.gov/projects/policyai</u> or email us at <u>policyai@pnnl.gov</u>

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