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Your ref:

Our ref: LTR-RAC-25-37

August 6, 2025

Subject: July 2025 CA Progress Report

Mr. Cassidy:

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

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

In response to the above requirements, the following is being reported to the Department since the last progress report submitted on July 11, 2025. The following progress report is for work occurring from July 1-31, 2025:

- (a) Actions during the previous month:
 - Planning for the Middle Ditch removal action continued.
 - Planning for the pilot scale study continued.
 - To support LEU+ construction planning:
 - Installed new lower zone monitoring well W-127 (paired with existing upper zone monitoring well W-84) and added new well W-23A to eventually replace well W-23R.
 - Developed groundwater wells W-127 and W-23A in preparation for future routine semiannual sampling.
 - Collected a groundwater sample from W-56 on July 1, 2025 for isotopic uranium analysis.
 - Prepared and submitted the semiannual groundwater data to SCDES via e-permitting on July 22, 2025 in an abbreviated format, "Monitoring Data Table Summary" as specified in the site's NPDES permit.

Pilot Study Work Plan

- Submitted the monitoring well application to SCDES for the installation of the chlorinated volatile organic compound (CVOC) pilot study area performance monitoring wells (PMWs).
- Installed the CVOC pilot study area PMWs.
- Developed and collected baseline samples from the pilot study PMWs in the CVOC study area and obtained groundwater samples from existing monitoring well pair W-120 and W-121.
- Submitted the Underground Injection Control permit application to SCDES on July 17, 2025 for the injection of the remedial amendment for the CVOC pilot study area.

(b) Results of sampling and tests:

Per its environmental data management program, CFFF has been monitoring a localized area of Uranium (U) impact in monitoring well W-56, including wells downgradient of W-56. Groundwater from monitoring well W-73, approximately 40 feet downgradient of W-56, and groundwater from monitoring well pair W-74 and W-75, located approximately 110 feet downgradient of W-56, has no U impact from CFFF operations. The U-238 isotope has been detected at estimated concentrations less than 0.2 ug/L in groundwater from downgradient monitoring wells W-73, W-74, and W-75, consistent with naturally occurring background concentrations.

CFFF began the quarterly sampling of groundwater from monitoring well W-56 following assessment of the October 2023 data. Results from the most recent January and April 2025 sampling events were 576 ug/L and 297 ug/L, respectively. W-56 was sampled again in July 2025 with a result of 549 ug/L. The next routine site-wide groundwater sampling campaign will occur in October 2025.

A pilot study is planned for winter/spring of 2026 to address U impacts in this area. This study will target groundwater from monitoring wells W-55 and W-56, where elevated U levels have been noted. While W-77 also shows U presence, its levels are lower.

CFFF will continue quarterly groundwater sampling from monitoring well W-56. As mentioned above, the increasing U levels in groundwater from monitoring well W-56 have not impacted other nearby monitoring wells and do not appear to be migrating beyond this isolated area. The isolated U impact around W-56 is approximately 4,000 feet from the CFFF property boundary, and the site's Conceptual Site Model remains unchanged.

- (c) Brief description of all actions which are scheduled for the next month:
 - Begin Middle Ditch soil removal.

Pilot Study Work Plan

- Perform remedial amendment injections according to the Underground Injection Control permit submitted and approved by SCDES for the pilot study.
- Schedule Clemson University professor Dr. Brian Powell and research students for a site tour. Dr. Powell and his team will be performing a bench scale treatability studies for Tc-99, as approved by SCDES to support CFFF's Pilot Study Work Plan.
- Continue planning for implementation of the pilot study work.
- (d) Percentage of work completed, and any delays encountered or anticipated:
 - 100% of the **Remedial Investigation** is complete.
 - 100% of the **Groundwater Flow Model** is completed.
 - 100% of the **Feasibility Study Work Plan** is completed.
 - 100% of the Groundwater Fate and Transport Model is completed.
 - 90% of the **Feasibility Study** is completed.
 - 100% of the **Pilot Study Work Plan** is completed.
 - 12% of the **Pilot Study** is implemented.
 - Currently there are no anticipated delays.

Respectfully,

Diana P. Joyner

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