

Westinghouse Electric Company

Nuclear Fuel

Columbia Fuel Fabrication Facility

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USA

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Your ref:

Our ref: LTR-RAC-25-54

December 3, 2025

Subject: November 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 **November 13, 2025.** The following progress report is for work occurring from **November 1-30, 2025**:

- (a) Actions during the previous month:
 - Completed two additional rounds of impacted soil removal from "Area 2" of the Middle Ditch on November 4th and November 18th.
 - Confirmatory soil sampling was conducted after each round of soil removal in accordance with the plan approved by the South Carolina Department of Environmental Services (SCDES).
 - Results from the second round of soil removal (Nov 4) indicated one location above the proposed site-specific Derived Concentration Guideline Levels (DCGLs). All locations were below the industrial use screening limits (IUSL). Several locations remained at 60-80% of the site's soil low-level investigation threshold of 10 pCi U/g. This threshold is intentionally set well below regulatory limits to ensure early detection and proactive management. As a precautionary measure, the site elected to remove an additional layer of soil (Nov 18) in targeted areas of the middle ditch.

- Results from the third round of soil removal (Nov 18) indicated one location above the IUSL (20251118-Area2-E2) in the top six inches of soil. In accordance with site procedures, additional soil will be removed from this location in January. Three other sampling locations were 80% of the site's low-level investigation threshold of 10 pCi U/g but remained below the site-specific DCGLs and the IUSL. Consideration for the additional soil removal at these locations will be made in the field based on site conditions and the ability to avoid groundwater interaction.
- Submitted paperwork and received approval from SCDES to properly abandon damaged groundwater wells W-115, W-116, and W-117 and to install replacement wells Dec 3-5.

Pilot Study Work Plan

- Followed the post-injection sampling and analysis plan for the chlorinated volatile organic compound (CVOC) pilot study area, allowing for the interaction and dispersion of the remedial amendment with groundwater prior to the first performance groundwater sampling event in December.
- Conducted bench scale testing with two ZVI samples to determine the reactivity of the materials with the site's groundwater from W-6.
- (b) Results of sampling and tests:

None

- (c) Brief description of all actions which are scheduled for the next month:
 - Abandon the damaged groundwater monitoring wells W-115, W-116, and W-117 and install replacement wells December 3-5.

Pilot Study Work Plan

- Continue the Tc-99 bench-scale treatability study work.
- Once scheduled by Clemson University professor Dr. Brian Powell, host a site tour of Columbia Fuel Fabrication Facility for the research team. Dr. Powell and his team are performing benchscale treatability studies for Tc-99, as approved by SCDES to support the Westinghouse Pilot Study Work Plan.
- Conduct the 3-month post-injection groundwater sampling for the CVOC pilot study area during the first week of December in accordance with the Underground Injection Control permit approved by SCDES.
- (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.
 - 27% of the **Pilot Study** is implemented.
 - Currently there are no anticipated delays.

Respectfully,

Diana P. Joyner

Lead Environmental Engineer

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ENOVIA Records