



thoughtful examination and refinement of the 2006 plans. Among other things, we discovered that the Baltimore layberth was perfectly suited for the project's needs. As a good prospective neighbor, MARAD initiated stakeholder outreach for the planned limited SAFSTOR upgrade before the ship arrived; this outreach expanded to address issues and concerns related to decommissioning, including communicating with the neighboring federal, state, and local agencies and jurisdictions, even though decommissioning was in the cognizance of the NRC. MARAD consulted under the National Environmental Policy Act (NEPA) to develop a supplemental EA for DECON in Baltimore and even reached out to the city to address the community's designation as a "nuclear-free zone." All of this was necessary because, unlike its landside brethren, *Savannah* was an itinerant facility with no long-standing ties to the community chosen for the work. And without advance outreach,

it would have been impractical to perform the work anywhere.

A so-called Undertaking under the NHPA has similarities to a so-called Action under NEPA. The Council on Environmental Quality encourages federal agencies to perform NEPA and NHPA consultations together, because of their overlapping similarities. Despite this, MARAD chose to conduct its NHPA Section 106 consultation independently. This was because the NEPA action of DECON could be considered on its own merits without further consideration of the action to dispose of the ship. However, the Undertaking recognizes that DECON inextricably leads to disposition, and that both aspects must be considered in parallel because activities in one influence the other.

Discussions began in 2013, laying the groundwork for formal consultation beginning in 2018. After several years and a

Continued

CREATING NUCLEAR WASTE MANAGEMENT SOLUTIONS FOR THE WORLD AND THE FUTURE



Holtec International's full-service fleet of storage and transport packages for spent nuclear fuel, and low, intermediate and high-level nuclear waste are cutting-edge systems, designed and built to the apex of safety, reliability and nuclear integrity. Holtec's solutions set the benchmark for the nuclear industry worldwide.

NUCLEAR WASTE TRANSPORTATION & STORAGE

USED NUCLEAR FUEL MANAGEMENT

ON-SITE SERVICES

ENGINEERING

MANUFACTURING

GOVERNMENT SERVICES

DECOMMISSIONING

AND MORE!

LEARN MORE ABOUT THE FUTURE OF CLEAN ENERGY AT WWW.HOLTEC.COM