



Oak Ridge Reservation Environmental Management  
Site Specific Advisory Board  
(ORREMSSAB)  
3 Main Street  
Oak Ridge, Tennessee 37830  
(423) 241-3665

August 28, 1996

Mrs. Marianne Heiskell  
DOE Oak Ridge Operations  
P.O. Box 2001, EW-92  
Oak Ridge, TN 37830

Dear Mrs. Heiskell:

The Oak Ridge Reservation Environmental Management Site Specific Advisory Board (ORREMSSAB) completed its review of the Oak Ridge Operations Office Environmental Management Ten Year Plan dated July 31, 1996. The Board reviewed and approved the enclosed comments and recommendations at the August 28, 1996 meeting.

The ORREMSSAB appreciates the opportunity to review the Ten Year Plan and looks forward to your consideration of and responses to the enclosed comments and recommendations.

Sincerely,

Bob Peelle, Chair  
ORREMSSAB

BP/sb

Enclosure



**Oak Ridge Operations Office Environmental Management**  
**Draft Ten Year Plan (Issued July 31, 1996)**

**Comments/Recommendations from the**  
**Oak Ridge Reservation Environmental Management**  
**Site Specific Advisory Board**  
**August 28, 1996**

The Oak Ridge Reservation Environmental Management Site Specific Advisory Board (ORREMSSAB) is skeptical about the probability of achieving the Oak Ridge Operations (ORO) Ten Year Plan (the Plan) because it is based on major assumptions that are not all within the Department of Energy's (DOE) purview. Furthermore, we believe the assumptions must be clearly understood by the appropriate budget authorities to avoid unwarranted fund cuts in the next century should there be uncompleted activities after the 10 year period. In order to gain local and regional support, we recommend that DOE revise the Plan paying increased attention to the wants and needs of the stakeholders.

At the very least, ORREMSSAB recommends that the next iteration consider the effects on the Plan if one or more of the assumptions is (are) unrealized. Such an assessment would (1) generate alternative pathways for managing the work currently residing within the Environmental Management (EM) Program and (2) provide options and a blueprint for Congress, DOE, state and federal regulators, and stakeholders to use in this time of shifting budgets and national priorities.

Furthermore, we recommend that (1) the DOE Common Ground Plan for the Oak Ridge Reservation (ORR), supplemented following additional stakeholder input, be the basis for the reindustrialization, privatization, and reduction of the federal footprint described in the Ten Year Plan and (2) DOE establish clean up standards acceptable to regulators and stakeholders for each category of land use.

Although the DOE and ORO Ten Year Visions may not be subject to the requirements of the National Environmental Policy Act (NEPA), we believe that subsequent ORR site actions and implementation of a Ten Year Plan are subject to NEPA because they are major federal actions with the potential for significant effects on the human environment.

Items of particular interest that must be addressed in more detail and/or considered in the next iteration of the ORO Ten Year Plan include but are not limited to:

- local and regional social and economic impacts;
- national initiatives for waste treatment that may result in the ORR receiving materials from other DOE, or other federal agency, sites;

- on-site disposal of low-level waste and some mixed low-level waste;
- cleanup of facilities and disposition of materials not currently in the EM Program;
- privatization of the Toxic Substances Control Act (TSCA) incinerator;
- clarification of DOE's plan for long-term institutional controls for ORR (i.e., greater than 100 years);
- the basis of the assumption that a free release standard will be established by 1999;
- the relationship of current budget plans to those presented in the Ten Year Plan including expected inflation rates;
- research and development for innovative technologies and recognition of uncertainties associated with such work;
- documentation of the benefits of new technologies and pollution prevention;
- coordination of various group efforts for reindustrialization of K-25 and clarification of the roles of these groups [e.g., the Community Reuse Organization of East Tennessee, (CROET)] including industrial input on the economics of industrial development;
- the unrealistic approach to the development and operation of private waste treatment facilities including the likelihood of capital investment in an uncertain market of short duration and the time required for construction and permitting; and
- validation of cost savings attributed to privatization.

Please provide the Board clarification of the relationship between CERCLA requirements and DOE Order 5820.2A-Radioactive Waste Management.

We understand the need for the EM planning for schedule and cost reductions described in the Ten Year Plan, but we expect that DOE will continue to meet its current EM obligations for cleanup of the ORR while the revised plan is underway.