



# AK RIDGE RESERVATION

Environmental Management

June 17, 1997

Mr. Rod Nelson  
Assistant Manager for Environmental Management  
DOE/ORO  
P.O. Box 2001  
Oak Ridge, TN 37831

Dear Mr. Nelson:

At our June 11, 1997 meeting, the Oak Ridge Reservation Environmental Management Site Specific Advisory Board (ORREMSSAB) reviewed and approved the enclosed recommendations for the Feasibility Study Proposed Plan (FS/PP) for Sludge Removal from the Gunitite and Associated Tanks Operable Unit Waste Area Group 1, Oak Ridge National Laboratory, Oak Ridge, Tennessee.

We look forward to receiving your written responses to our recommendations. Thank you for your continued support of the ORREMSSAB.

Sincerely,

Randy Gordon, Chair  
ORREMSSAB

ER/RG/sb

Enclosure

cc: Mr. John Hankinson, USEPA Region IV  
Mr. Earl Leming, TDEC/DOE/ORO



**Comments on the Feasibility Study/Proposed Plan (FS/PP) for  
Sludge Removal from the Gunitite and Associated Tanks Operable Unit  
Waste Area Group 1, Oak Ridge National Laboratory  
Oak Ridge, Tennessee**

The Oak Ridge Reservation Environmental Management Site Specific Advisory Board (ORREMSSAB) is in general accord with the second alternative described in the FS/PP to remove the bulk of the liquid and sludge from the gunitite and associated tanks. The no action alternative would be entirely unsatisfactory and quite problematic. Piping the activity to the more modern Melton Valley Storage Tanks to mix with similar wastes seems the correct course.

The document describes the removal of sludges as an interim action and states that it is expected that the removed sludges will be sent to the Waste Isolation Pilot Plant (WIPP). Since the WIPP facility is not yet an operational facility, there should be discussion about the safety of storing the gunitite tank waste in the Melton Valley Storage Tanks for an unknown interim period. Either in this document or elsewhere, there should be contingency plans in case postponement of the WIPP continues indefinitely or WIPP does not open at all.

The document also discusses that remedial action on the contents of TH-4 is being deferred until a later date. However, the program under which TH-4 will be addressed is not identified. Similarly, the remedial actions to address the tank shells, appurtenances, surrounding soils, and groundwater have not been identified, although it is our understanding that these actions will be addressed in the Bethel Valley Record of Decision. The public needs to be informed as to when and how deferred actions will be addressed.

We assume that the most efficient time to determine the post-transfer residual contamination of each tank is just after the sludge and liquids have been removed from that tank. The initial sampling plan outlined in the section describing alternatives (p. 11) will likely be too sparse unless video observations suggest that tank inner surfaces appear to be uniform and clean. The ORREMSSAB recommends that the Record of Decision explicitly outline a more comprehensive minimum sampling plan which will determine the nature of irregular features. This information will allow for dependable plans to be developed for the future tank closures.