



OAK RIDGE RESERVATION

Environmental Management

May 17, 1999

Mr. Gary S. Hartman
U.S. Department of Energy
Oak Ridge Operations, DP-80
P.O. Box 2001
Oak Ridge, TN 37831-2001

SITE WIDE ENVIRONMENTAL IMPACT STATEMENT FOR MODERNIZATION OF THE Y-12 PLANT

Dear Mr. Hartman:

The Oak Ridge Site Specific Advisory Board (ORSSAB) is a nonpartisan, broadly representative group of citizens with interests and concerns related to the environment at the Oak Ridge Reservation and surrounding areas. The Board's mission is to provide informed recommendations and advice to DOE regarding environmental restoration, waste management, future land use, and economic development of specified areas. We are also committed to serving as a communications link between the public and the relevant government agencies. ORSSAB is chartered under the provisions of the Federal Advisory Committee Act.

The ORSSAB has not had the opportunity to fully understand all of the ramifications of the proposed modernization program at Y-12; however, we offer several comments for the scoping process of the site-wide Environmental Impact Statement (SWEIS).

First, the concept of modernization and reducing the plant footprint is very appealing. This approach will permit substantial improvement in the ability of Y-12 to comply with and exceed current and revised regulatory requirements for operations, which will assure the health and safety of workers and nearby residents. Continued operation of the existing plant will likely require constant and costly upgrading and retrofit of 50 year old facilities to achieve appropriate protection of our citizens. It will be especially important to ORSSAB that the SWEIS quantitatively address the expected improvement in health and safety and environmental protection. We request that the EIS address whether the promise of improved health and safety will be achieved by the proposed action.

Second, modernization of the Y-12 Plant must be coordinated with the Environmental Management Program's (EM) plans for remediation of the site. Coordinated planning will lead to removal of unnecessary facilities, reduction of the footprint, and uncontrolled use of the eastern end of the site. However, such coordination will be a challenge. As pointed out on pages 18 and 19 of the summary of the Final Environmental Impact Statement for the Construction and Operation of the Spallation Neutron Source (DOE/EIS-0247, April 1999), coordination with the EM program "... could affect

Mr. Gary S. Hartman
May 17, 1999

Page 2


both the budget and schedule of the project.” Nevertheless, we expect the Y-12 Plant SWEIS to assess coordination of the planning and construction activities of the two programs.

Third, modernization and footprint reduction are consistent with the End Use Working Group recommendation regarding Y-12 that was prepared by a widely representative group of area citizens and endorsed by ORSSAB (copy enclosed). Please address this item in the SWEIS.

Finally, we support the economic benefits that the region will obtain from the safe and environmentally acceptable operation of the modernized Y-12. These and related socioeconomic efforts should be carefully addressed in the SWEIS.

In summary, we support a well-planned and carefully executed modernization of Y-12. We will reserve final comments until we are able to review the draft EIS.

Sincerely,



William M. Pardue, Chair

WMP/sb

Enclosure