



## Department of Energy

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January 7, 1999

Mr. William Pardue, Chair  
Oak Ridge Reservation Environmental Management  
Site Specific Advisory Board  
Post Office Box 2011  
Oak Ridge, Tennessee 37831

Dear Mr. Pardue:

### **RESPONSE TO ENVIRONMENTAL MANAGEMENT SITE SPECIFIC ADVISORY BOARD COMMENTS ON THE MELTON VALLEY (D1) PROPOSED PLAN OF JULY 1998**

Reference is made to the Oak Ridge Reservation Environmental Management Site Specific Advisory Board (ORREMSSAB) letter to the Department of Energy (DOE) dated November 5, 1998, which provided an enclosure entitled "Comments on the Melton Valley (D1) Proposed Plan of July 1998." We are currently in the process of evaluating comments from the regulatory agencies and will be developing the D2 version of the Proposed Plan in January 1999. DOE is appreciative of the effort of the SSAB in understanding the environmental conditions in the watersheds and providing well considered guidance on solutions. Following is a response to your comments on the Melton Valley Proposed Plan (PP):

#### **General Response**

A number of the comments pertain to the degree of detail that should be in the PP or the Record of Decision (ROD). We intend to expand the PP discussion of the Feasibility Study alternatives and provide the rationale for the combination of actions that were selected for the PP.

Details on institutional control are still a source of discussion between DOE, Environmental Protection Agency, and the State which might be documented in a separate document from either the PP or the ROD. However, we agree that the technical work, specifics of institutional control, and monitoring for effectiveness need to be understood and documented.

#### **Response to Specific Comments**

##### **1. Protection of workers**

The burial grounds and areas that will be accessed by maintenance workers will be cleaned up to a standard of 50 microrem/hr. The assumed exposure is 200 hours per year and the excess cancer risk to a maintenance worker is 1/10000. This standard is also acceptable for recreational use. We used references to recreational use partly to convey the message that the area is safe enough for that type of general public use even though it will not be open to the public.

2500 microrem/hr is the proposed cleanup level in the floodplain soils and sediments which are not expected to be frequented by maintenance workers. These areas will be institutionally controlled to prevent human exposure.

2. Preventing contaminant migration within the valley

Additional detail and descriptions will be provided as outlined in the General Response above.

The extent to which transuranic wastes will be removed is dependent upon sufficient information to locate specific waste packages, the difficulty and risk to recover the waste, and the remedial action proposed for other wastes near or surrounding the transuranic wastes. For example, it might not be reasonable to recover a small amount of transuranic wastes that are surrounded by other waste disposals if a cap is proposed for the whole disposal area. The extent of transuranic waste removal is receiving further evaluation and discussion with the regulatory agencies.

The level and type of continuing contamination from Bethel Valley will be known after the PP and ROD are finalized for that valley.

3. Preventing contaminant migration to the Clinch

The expected water quality for the various streams is based on the objective to meet recreational use criteria.

Projections of contaminant levels reaching the Clinch River with time will be considered as possible additional detail in developing the D2 PP in accordance to the General Response above.

Your comments on considering 1000 year floods and lesser floods will be considered as the D2 PP is developed.

4. Achieving adequate monitoring

A conceptual criteria for the overall environmental monitoring program will be addressed as outlined in the General Response above.

5. Meeting the community guidelines

The Community Guidelines have provided important direction to the development of the remedial actions for the Melton Valley. We believe the final decisions will be consistent with the guidelines.

Mr. William Pardue

-3-

6. Establishing adequate stewardship arrangements

We recognize there are other contaminants beside Cs-137 and Sr-90. The PP states these are the "predominant" contaminants, not the "only" contaminants. We don't think it is correct to characterize the referenced paragraphs as containing a "flaw." The longer-lived radionuclides will require perpetual institutional control or access control in some areas of Melton Valley.

A Land Use Controls Assurance Plan will be developed to address long-term stewardship for the Oak Ridge Reservation. Implementation plans will provide the specifics for the various watershed RODs.

We appreciate the contributions of the SSAB and look forward to its continued support as we complete the Comprehensive Environmental Response, Compensation, and Liability Act documentation phase and move into field work. If you have any questions, please call John Ford of my staff at (423) 576-0623.

Sincerely,



Rodney R. Nelson  
Assistant Manager for  
Environmental Management

Enclosure