



Many Voices Working for the Community

Oak Ridge Site Specific Advisory Board

March 9, 2006

Mr. Steve McCracken
Assistant Manager for Environmental Management
DOE-Oak Ridge Operations
P.O. Box 2001, EM-90
Oak Ridge, TN 37831

Dear Mr. McCracken:

**Recommendation 143: Recommendation for Independent Verification
at East Tennessee Technology Park**

At our March 8, 2006, meeting, the Oak Ridge Site Specific Advisory Board approved the enclosed recommendation.

We appreciate your consideration of this recommendation and look forward to receiving your written response.

Sincerely,

A handwritten signature in cursive script that reads "Kerry Trammell".

Kerry Trammell, Chair

Enclosure

cc/enc: Dave Adler, DOE-ORO
Pat Halsey, DOE-ORO
Connie Jones, EPA Region 4
Rex Lynch, Anderson County Mayor
James O'Connor, Oak Ridge City Manager
Melissa Nielson, DOE-HQ
John Owsley, TDEC
Ken Yager, Roane County Mayor



Recommendation 143 Oak Ridge Site Specific Advisory Board Recommendation on Independent Verification at East Tennessee Technology Park

Background/Introduction

The Oak Ridge Gaseous Diffusion Plant, commonly known as K-25, began operations during World War II to enrich uranium for use in atomic weapons. The plant also produced enriched uranium for the commercial nuclear power industry from 1945 to 1985.

Plant operations were shut down in 1987. But a legacy of hazardous waste and contamination throughout the site led to a major cleanup effort by the Department of Energy (DOE) through restoration of the immediate environment, decontamination and decommissioning (D&D) of facilities, and management of legacy wastes. That work is well underway and is scheduled for completion in 2008.

The long-term goal for the site, now known as East Tennessee Technology Park, is to redevelop it as a private industrial park. Uncontaminated facilities and buildings that have undergone D&D are offered to the Community Reuse Organization of East Tennessee (CROET). CROET, in turn, leases these properties to private industry. Buildings that are unused or not transferred to CROET will be demolished.

A number of buildings have already been transferred to CROET. D&D has recently been completed on three large process buildings: K-29, K-31, and K-33. K-29 will be demolished, while tenants are being sought for K-31 and K-33.

Many other above-ground facilities will be demolished, and other cleanup work is underway or remains to be completed, including the removal of cylinders storing uranium hexafluoride gas, removal of K-1401/K-1420 sumps, remediation of the K-1070-C/D area and Mitchell Branch plumes, remediation of a number of surface water ponds, and eventual remediation of contaminated soils, buried wastes, and subsurface structures in the area designated as Zone 2 of ETTP.

All of this work is an effort to adequately clean up all of ETTP so the area will be acceptable for safe industrial use by private enterprise, commonly referred to as reindustrialization.

Discussion

The success of the reindustrialization of ETTP hinges on the attractiveness of the site to private enterprises. Whether the site is suitable to their needs will be determined on a variety of factors, not the least of which is worker safety. Site workers and the companies that employ them must be absolutely certain that the area is a safe environment in which to work and that there is no danger to workers through residual contamination or other exposures to hazardous wastes.

While DOE is making every effort to ensure the site is being properly cleaned up by its primary contractor and its subcontractors, another level of assurance can be achieved through independent verification (IV) a process that confirms residual contamination levels meet the pre-established remediation criteria.

The goals of IV include:

- independent evaluation of final site conditions and validation of the cleanup contractor's final status survey procedures, results, and documentation
- increased probability of complete remediation and documentation.

Benefits of IV include:

- directly supports DOE's strategic objective to build public trust and confidence in DOE's management of nuclear work force health issues and environmental cleanup activities. IV greatly enhances public credibility since it's an unbiased look at the D&D process
- provides consistency among the multitude of decommissioning projects that may be taking place at a site, and
- helps ensure that D&D plans and reports are technically sound.

Successful reindustrialization of ETTP is vitally important for the future of the Oak Ridge community. Bringing new industries into the area will bring many new benefits and opportunities. To secure reindustrialization, every effort must be made to convince potential businesses and their workers that ETTP is a safe place to work.

IV on the Oak Ridge Reservation is not without precedent as it was employed to validate cleanup of East Fork Poplar Creek in the early 1990s and the recent Three Building D&D Project at ETTP, as well as an offsite verification at the David Witherspoon site in Knoxville, Tenn. However, the Oak Ridge Site Specific Advisory Board (ORSSAB), at this time, is only concerned with IV at ETTP because it will be used by private enterprise and will be publicly accessible. Other sites undergoing, or due to undergo remediation, will have restricted access.

Recommendation

ORSSAB believes that IV will provide another level of assurance as to the viability and safety of the ETTP as a site for future development. In addition, ORSSAB believes that IV will result in enhanced credibility with the public and potential developers regarding the status of clean up and remediation.

Therefore, ORSSAB offers the following recommendations to DOE-Oak Ridge:

- 1) ORSSAB recommends that DOE conduct IV at ETTP. ORSSAB sees merit in conducting IV for all of ETTP and recommends prioritizing the effort on the development areas with potential for transfer of ownership from the Federal government to state or local governments or the private sector (e.g., areas planned for reindustrialization and/or for transfer of property from DOE to the private sector or the City of Oak Ridge).
- 2) ORSSAB does not wish to have any role in selecting a contractor but requests the opportunity to review and comment on plans for implementing IV and subsequent results. ORSSAB strongly believes that the scope of IV should address both radiological and hazardous residual contamination concerns.
- 3) ORSSAB requests that DOE provide periodic status/progress updates to the Environmental Management Committee in the form of written status summaries or presentations. ORSSAB may also request additional information or presentations as recommended by the Environmental Management Committee.
- 4) ORSSAB recommends that DOE select a contractor or contractors experienced in performing IV for sites with both residual radiological and hazardous contamination.