



AK RIDGE RESERVATION

Environmental Management

September 3, 1997

Ms. Estraletta Green
U.S. Department of Energy
Oak Ridge Operations
P.O. Box 2001
Oak Ridge, TN 37831

Dear Ms. Green:

At our September 3, 1997 meeting, the Oak Ridge Reservation Environmental Management Site Specific Advisory Board reviewed and approved the enclosed comments on the "Accelerating Cleanup: Focus on 2006" Discussion Draft (June 1997) for the Oak Ridge Reservation.

We appreciate the opportunity to submit our comments and look forward to your written response.

Sincerely,

Randy Gordon
Randy Gordon
Chair, ORREMSSAB

RG/sb

Enclosure

cc: Mr. John Hankinson, USEPA Region IV
Mr. Earl Leming, TDEC/DOE/ORO
Ms. Susan Gawarecki, LOC
ORREMSSAB Members



**Oak Ridge Reservation Environmental Management
Site Specific Advisory Board**

**Comments on "Accelerating Cleanup: Focus on 2006"
Discussion Draft (June 1997)**

The national effort to develop a self-consistent plan for Department of Energy/Environmental Management (DOE/EM) work during the next decade is commendable. Only through such focused effort can citizens in- and outside the agency understand the complexity of the operation, the interconnectedness of the work at various sites, and the "assumptions" in use for program planning. The planning effort has been useful, and the resulting controversy inevitable. Our principal concerns are that the magnitude of the task is underestimated, and that the underestimate will encourage unrealistic expectations at the Department of Energy (DOE) and the Congress. The false expectations could make difficult the acquisition of sufficient funds.

Credibility of Funding Requirement Estimate. The discussion of approaches to enhanced performance/efficiency is good. However, it should be clear to most everyone that the funding requirement has been scaled back to match the perception of what will be available. There is nothing wrong with proceeding to work at cleanup/stabilization in the most competent and efficient manner possible with available funds. This is the best that DOE and the American Public can hope for. But to be less than completely forthright about what this funding estimate actually represents may leave DOE vulnerable to further erosion of credibility and might even jeopardize the long-term success of the mission. It should be understood by all that it will take a few years to fully determine the scope of work to be done and to generate a solid estimate of funding requirements. It could develop that preliminary cost estimates were high.

Spending Caps. As mandated by Department of Energy Headquarters, the 2006 Plan is driven by budget and is based on a spending cap of between \$5 and \$6 billion. Under planning scenarios of \$5 billion and \$5.5 billion, some compliance agreement milestones for the Oak Ridge Reservation (ORR) would not be met. The Oak Ridge proportion of the projected budget seems too small for the work that must be accomplished. The DOE should not start with the question of "how much money do we have?" but rather "what needs to be done to responsibly remediate the ORR?". As long as the DOE does not ask for the money that it needs for efficient and responsible cleanup, the prophecy of "we won't have enough money" will continue to be self-fulfilling.

Out of Date Information. In many instances in the 2006 Plan, information is presented which appears to be out of date. (For example, on page A-27, the assumption is presented to use in situ vitrification for treatment of the K-1070-C/D G pit. The D2 version of the Record of Decision for K-1070-C/D does not call for the use of in situ vitrification for this

pit.) The next and future drafts of the 2006 Plan should reflect current state of affairs in regard to remediation strategies, technologies expected to be employed, and expected funding.

Wording of Document Title Misleading. The title, "Accelerating Cleanup: Focus on 2006," given to the discussion draft for the ORR implies that contamination will be removed and the ORR will be restored to a "clean" status. However, the 2006 Plan does not describe cleanup; except in relatively few cases, it describes stabilization, monitoring, and control of the most contaminated sites. Language should match reality. The words "cleaned up" should not refer to areas which will remain contaminated even if the contamination is stabilized. The public should not be misled; the "cleanup" program now envisioned will leave large areas significantly contaminated with radioactive and hazardous wastes. A more realistic title for the document might simply be "Environmental Management: Focus on 2006."

Appendix B. Part of the 2006 Plan's utility derives from improvements in the wording of the assumptions given in Appendix B of the Oak Ridge document. These resulted in part from an intensive set of stakeholder workshops that we found helpful; the meetings involved both internal and external stakeholders. The report in that appendix is generally accurate, but might mislead a reader who did not attend the workshops. The statement that "no issues were raised" about an assumption does not mean that participants considered the assumption wise or realistic. Rather, lack of discussion usually meant that the assumption was clear to those present.

For each issue in Appendix B, modes of resolution are indicated. Definite efforts will be required by DOE to assure that needed discussions take place. For example, the End Use Working Group, spawned by the Oak Ridge Reservation Environmental Management Site Specific Advisory Board, does not expect to comment on many issues for which the group is listed. Many difficult issues are assigned to the National Dialogue. By the beginning of the year 1998, it may be known whether that effort will be effective. If not, another approach will be needed. The issues are real.