



Many Voices Working for the Community

Oak Ridge Site Specific Advisory Board

June 3, 1999

Ms. Barbara Brower
U.S. DOE-Oak Ridge Operations
P.O. Box 2001, EM-922
Oak Ridge, TN 37831

COMMENTS ON DRAFT *ACCELERATING CLEANUP: PATHS TO CLOSURE OAK RIDGE OPERATIONS OFFICE, MAY 1999*

Dear Ms. Brower:

Enclosed are Oak Ridge Site Specific Advisory Board comments on the draft document "*Accelerating Cleanup: Paths to Closure Oak Ridge Operations Office, May 1999.*" These comments were approved unanimously at our June 2, 1999, Board meeting.

We appreciate the opportunity to comment on the document and look forward to reading the final version.

Sincerely,

A handwritten signature in cursive script that reads "William M. Pardue".

William M. Pardue, Chair

WMP/plo

Enclosure

cc: Rod Nelson, DOE-ORO
Marianne Heiskell, DOE-ORO
Susan Gawarecki, LOC



Oak Ridge Site Specific Advisory Board Comments on Draft *Accelerating Cleanup: Paths to Closure* Oak Ridge Operations Office, May 1999

The Oak Ridge Site Specific Advisory Board (ORSSAB) reviewed the above referenced document and the May 1999 iteration of Appendix F: “Public, Environment, and Worker Hazards and Risks.” We found the 1999 *Paths to Closure* document to be well organized and well written, and we are particularly pleased to find stakeholder interests embedded in the *Paths to Closure* strategy (e.g., end use and stewardship). The assumptions upon which the 1999 Environmental Management Program is based are clearly stated, and the new life cycle baseline strategy provides stakeholders with a road map to remediation actions and a way to judge progress. We applaud the construction logic approach for sequencing and prioritizing the work.

We recognize that progress is dependent on adequate funding and that \$600M is required to meet the near-term compliance drivers at all facilities. We urge Oak Ridge Operations to do everything in its power to ensure that Oak Ridge gets sufficient funds to implement the baseline strategy. As stakeholders, members of the Board will continue to communicate Oak Ridge needs to Congress and DOE-Headquarters.

We are anxious for DOE to move ahead with remediation of the contaminated areas on the Oak Ridge Reservation (ORR). To that end, we urge DOE, EPA Region 4, and the State of Tennessee to quickly resolve remedial/watershed decision differences as they arise.

We note that a validation team consisting of outside reviewers will complete its review of the life cycle baseline in June 1999. The Board requests a copy of the validation team report. We also urge the team to review Appendix F. Several ORSSAB members provided informal comments to DOE on the April iteration of Appendix F. The May iteration is somewhat improved. Nevertheless, the data in Table 1 should be reviewed for accuracy. We are including some comments on the ORR portion of Appendix F, which at some points seriously misrepresents the existing situation.

In addition, please make the following revisions to the text:

Page	Line	Comment
xii	First full paragraph, line 5	The word “completed” does not fit. Please delete it or otherwise correct the line.
1-5	Sect. 1.2.3	This section seriously understated the ongoing work of Oak Ridge National Laboratory. The part about early plutonium work is adequate except that the word “materials” should be inserted after the word “weapons” in line 4.
3-1	Sect. 3.2, paragraph 2	The first sentence should read: “The End Use Working Group (EUWG), a broad-based stakeholders group, was initiated by the OR Site Specific Advisory Board (SSAB) and completed...”
3-2	Last sentence of the unrestricted industrial scope paragraph	Is it really your intention to excavate groundwater contamination sources and control plumes through groundwater extraction on all industrial areas outside the main plant area? Please verify the statement.

Page	Line	Comment
11-2	Paragraph 3	The first line should read “The Budget and Prioritization Team of the OR SSAB has joined with members of the Local Oversight Committee’s Citizens’ Advisory Panel and is dedicated...”
B-3	Beginning	The map of Oak Ridge at the beginning of Appendix B contains old errors at least at the extreme west end of the ORR (where the ORR contains about a square mile not in the reservation) and along the northern boundary (where the city stretches outside the ORR and contains many city streets, some for a decade.) ORSSAB has previously requested that the relation between the ORR and the City of Oak Ridge be shown correctly on all maps in official documents. Also, the ORR End Use map should indicate that the end uses are the “projected” ones, since Records of Decision are not yet signed.
F-2	Last paragraph	The text refers to risk calculations and other quantitative aspects of “risk.” In the portion on the ORR, no such risk estimates were found.
F-7		The “watersheds” are “administrative watersheds.”
F-7	Paragraph 4, line 6	Strike the words “could potentially.” Contaminant leakage has occurred for a long time.
F-7	Paragraph 4	The four reasons for dividing the reservation by watershed may not be the reasons given in the main text of the document.
F-7	Last line	The word “remove” should be “removal.”
F-8	First full paragraph, line 5	Recognize that contaminated water flows off site now.
F-8	First full paragraph, line 6	Strike the word “potential.”
F-8	Second full paragraph	The text refers to institutional controls on Lower East Fork Poplar Creek. Advisory signs, whether missing or not, are misleadingly termed “controls.” Which institution is “in charge?”
F-9	First paragraph under Waste Management	The paragraph gives the impression that stored waste volumes are now generally being reduced. This would be a good idea. The Board understands that such a reduction is a goal rather than a reality.
F-9		Many materials are mentioned on page F-9 that are not now Environmental Management Program responsibility, but no mention is found of the DUF6 cylinders that copiously abound. At least a footnote is required.
F-10	Paragraph 3	This paragraph suggests that remediation will begin once watershed Records of Decision are signed. Citizens believe that the many removal and other interim actions already performed or underway have been an important part of the remediation work.
F-10	First line of the next-to-last paragraph	The phrase “All environmental management waste” should be changed to “All presently stored waste” to avoid giving the impression that wastes generated in 2006, for example, would be shipped by 2006 as well.