

## **Department of Energy**

Portsmouth/Paducah Project Office 1017 Majestic Drive, Suite 200 Lexington, Kentucky 40513 (859) 219-4000 NOV 0 4 2014



PPPO-03-2574925-15

Mr. William Henderson II, Chair Portsmouth EM Site Specific Advisory Board 1862 Shyville Road Piketon, Ohio 45661

Dear Mr. Henderson:

RECOMMENDATION 13-02: PORTSMOUTH ENVIRONMENTAL MANAGEMENT SITE SPECIFIC ADVISORY BOARD INPUT REGARDING WASTE DISPOSITION FOR THE DECONTAMINATION AND DECOMMISSIONING PROJECT AT THE PORTSMOUTH GASEOUS DIFFUSION PLANT

This correspondence is written in response to the U.S. Department of Energy (DOE) Office of Environmental Management (EM) Portsmouth Site Specific Advisory Board (SSAB) Recommendation 13-02. DOE understands the SSAB's position on waste disposition and appreciates the constructive and cooperative manner put forth by the SSAB in the development of this recommendation.

As discussed in numerous SSAB meetings and as outlined in the Waste Disposition Proposed Plan, DOE has identified a combination of off-site and on-site disposal as the preferred alternative for disposing of the waste generated by the Portsmouth Decontamination and Decommissioning (D&D) project. Implementation of the on-site disposal component of the preferred alternative will require a large amount of fill material. Should an on-site disposal cell (OSDC) be selected, DOE would prefer to utilize fill soil originating from areas inside of Perimeter Road that is derived from the plume areas and existing landfills (Contaminated Fill). The decision to use Contaminated Fill is predicated on several factors related to the anticipated funding, the long-term cost benefit, and ensuring protectiveness of human health and the environment at the Site. The preference to use this Fill is supported by a business case analysis approved by DOE Headquarters after an independent review by the U.S. Army Corps of Engineers. It is important to note that although DOE has identified its preference to utilize contaminated fill material in the preferred alternative, the use of the fill will require additional authorization/approval before DOE can move forward to obtain and place the fill in the OSDC.

In addition to the above, DOE has incorporated the basic tenets of the SSAB's recommendation into the design of the potential OSDC. For example, the design of the OSDC considers the volume reduction associated with the segmentation of converters. Segmentation of converters would allow for the recovery for reuse of the barrier material should this be deemed technologically and economically feasible.

DOE agrees with the SSAB recommendation that no waste currently not onsite will be placed in any Portsmouth OSDC, and any materials not meeting the Waste Acceptance Criteria of the OSDC will be disposed off-site.

DOE also agrees that an implementable land use plan should be developed and is committed to recycling. For example, DOE continues to transfer reusable and recyclable material to the Southern Ohio Diversity Initiative. DOE is also pursuing opportunities to expand our recycling efforts.

DOE would like to note it has considered the tenets of the SSAB Recommendation 13-02 in the development of its waste disposition plans, as evidenced by the inclusion of various components of this recommendation in the Waste Disposition Proposed Plan, the draft PORTS Lifecycle Baseline and amendments to the DOE/Fluor-B&W Portsmouth, LLC contract.

In closing, DOE sincerely appreciates the effort put forth by the SSAB in coming up with the Recommendation and will continue to take it into consideration as it proceeds with the work at the site. DOE encourages the SSAB to remain an active participant in the regulatory, stakeholder and public process and to provide input during the upcoming Proposed Plan Public Comment Period to assist DOE in the development of the Waste Disposition Record of Decision.

Sincerely,

Joel B. Bradburne

SSAB Deputy Designated Federal Official

Portsmouth Site Lead

Portsmouth/Paducah Project Office

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