



Recommendation 13-02  
May 2, 2013

*Portsmouth EM Site Specific  
Advisory Board*

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**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**

**BACKGROUND:** Since the inception of the Portsmouth (PORTS) Environmental Management (EM) Site Specific Advisory Board (SSAB) in July 2008, the U.S. Department of Energy (DOE) and its contractors have provided information to the board to educate members on the complex issue of waste disposition. The Decontamination and Decommissioning (D&D) of the Portsmouth Gaseous Diffusion Plant forces the government, contractors, elected officials and other stakeholders to evaluate the management of more than two million cubic yards of waste and the consideration of an on-site disposal facility (OSDC).

Beyond the issue of waste placement, the board also wants the DOE to be mindful of cost and schedule impacts, job impacts, recycling impacts, and, most importantly to the board, the impacts this decision will have on reindustrialization and the future economic stability of our region. The PORTS EM SSAB can say with confidence that our members have worked diligently to understand the issues, and are fully aware of the long-reaching effects this decision will have. We have considered the various variables and are confident this recommendation reflects the values of this community and we believe it to be in the best interests of our region.

The recommendation that follows is provided to add clarity on Recommendation 12-03, and to more clearly define the SSAB's position on Waste Acceptance Criteria (WAC) and constitutes years of hard work. During that time, we also believe DOE and its contractors have worked diligently to engage the PORTS EM SSAB, and we are appreciative of their efforts.

**RECOMMENDATION:** The PORTS EM SSAB believes it is important for DOE to understand the basis for its support of an On-Site Disposal Cell (OSDC). That support does not come from an overarching desire to have nuclear waste placed in our community. The only justification for such a decision is that it provides our community its best chance for economic stability in the near term and economic growth for the long term. However, the board wants to make it clear to DOE and the Ohio EPA that it objects to an On-Site Disposal Cell unless certain conditions can be met and explicitly outlined in the upcoming Proposed Plan, regardless of any regulatory hurdles that may exist. To put it simply, these regulatory hurdles are not ours to overcome, but rather they are the responsibility of a concerted effort on the part of DOE, site contractors and the Ohio EPA.

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The PORTS EM SSAB, like elected officials from throughout the region, endorses the concept of the Future Vision Plan. Our principles for supporting an OSDC, which included aspects of the Future Vision Plan, need to be outlined in the DOE Proposed Plan. If DOE and/or the Ohio EPA believe any of them are not feasible, or for whatever reason they cannot be accomplished, then the PORTS EM SSAB recommends all D&D waste be disposed of off-site. The principles are as follows:

- The PORTS EM SSAB requests no new waste generated from off-site locations be placed in any Portsmouth OSDC.
- The PORTS EM SSAB requests all contaminated plumes be exhumed and remediated in a manner that allows for future reindustrialization without unnecessary restrictions at those locations.
- The PORTS EM SSAB requests all known landfills within Perimeter Road, as identified in the Waste Disposition Remedial Investigation Feasibility Study (RI/FS), be consolidated into the OSDC and remediated in a manner that allows for future reindustrialization at those locations. If radiological material exists in any of the currently capped landfills that does not meet the Numerical and Administrative Waste Acceptance Criteria, it must be disposed of off-site.
- The PORTS EM SSAB requests all barrier material, outside of the 326 building, be segregated for the potential recovery of its valuable nickel. If the recovery of the nickel material is not deemed to be financially advantageous or achievable, the PORTS EM SSAB requests all barrier material be disposed of off-site. Such a determination regarding the reuse of the nickel assets shall be made in the near term and shall not exceed the next 5 years for a finalized plan. Final disposition shall not expand beyond 10 years for all of the recovered nickel to be reused / recycled and be removed from the Piketon site.
- The PORTS EM SSAB requests all current and existing waste from the Depleted Uranium Hexafluoride (DUF6) conversion operations be disposed of off-site as these are known to contain highly toxic and radiological contaminants.
- The PORTS EM SSAB requests the DOE fund an implementable land use plan (as was done for the Miamisburg Mound complex) resulting in a usable end state for whatever reuse opportunities become available. We request that this plan incorporate green space and aesthetics as a component of design.

As the PORTS EM SSAB has previously indicated, recycling in an environmentally advantageous way, while being considerate of environmental concerns, is of utmost importance to our community. The community is hopeful DOE will establish a large scale recycling and reuse program to not only benefit our community, but communities across the nation, as outlined in Recommendation 13-01.

As for other Waste Acceptance Criteria (WAC) clarifications, the PORTS EM SSAB will be satisfied with the WAC agreed upon by the Ohio EPA, provided the requests contained in this

recommendation are contained in the Proposed Plan and incorporated into the Record of Decision.

The PORTS EM SSAB has determined this to be an acceptable resolution to the numerous interests involved in this matter, taking into account the scientific data, public opinion and the economic redevelopment interests of the surrounding area. The PORTS EM SSAB stands firmly behind this recommendation and looks forward to continued dialogue with DOE and we are fully committed to the health, financial well-being and quality of life of our neighbors and friends.

The PORTS EM SSAB would appreciate a timely response to this recommendation and appreciates DOE's attention to this matter.

Thank you.