



Commendation

March 28, 2000

K-Area Reactor Seepage Basin Use of Plug In Record of Decision

Background

The SRS Citizens Advisory Board (CAB) has been a proponent of the Plug-In Record of Decision (ROD) approach since it was first introduced at SRS in 1997 (see Recommendation No. 46). Plug-In RODs streamline the remedy decision process, reduce documentation, and expedite remediation. The result of the Plug-In ROD is a more efficient process that reduces the overall regulatory costs and decreases considerably the time to initiate field work. The SRS CAB has been looking forward to the implementation of actual field work under the Plug-In ROD process and is pleased to see K-Area Reactor Seepage Basin beginning this course of action. Furthermore, we expect to see the use of the Plug-In ROD at the other original candidate units (C-Area Seepage Basin, L-Area Reactor Seepage Basin, and P-Area Reactor Seepage Basin) and anticipate its use at other candidate units in the near future.

To invoke the SRS Plug-In ROD for a particular unit, a unit-specific Decision Document, called an Explanation of Significant Difference (ESD), has to be prepared. The purpose of the ESD is to demonstrate that a unit meets the criteria specified in the Plug-In ROD. Contrary to the name of the document, it does not imply that there is a significant difference but confirms that the Plug-In ROD remedy actually meets the specific unit conditions.

The three agencies (DOE, EPA Region 4, and SCDHEC) have determined that using an ESD format is a key component in communicating remedial decisions for the Plug-In ROD. In order to show that remediation for a unit can be expedited under the Plug-In ROD and that there are no significant differences, four key criteria must be evaluated. These criteria are:

1. The Waste Unit is radiologically contaminated.
2. The unit is in a current industrial use area adjacent to a current nuclear facility.
3. The unit contains principal threat source material (PTSM).
4. The PTSM is not in contact with groundwater or adjacent to surface water.

If a unit meets all these criteria, then the Plug-In ROD is appropriate. If any one criterion is not satisfied, then the Plug-In ROD is not appropriate, and an alternate administrative process must be used.

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The first Explanation of Significant Difference (ESD) has been released for public comment for the K-Area Reactor Seepage Basin (Ref. 1). It confirms the use of the Plug-In ROD. The SRS CAB enthusiastically supports this conclusion. Release of the ESD permits the CAB an opportunity to commend the three agencies on their effort to significantly reduce the costs of cleanup, the regulatory paperwork, and the time involved in achieving actual unit remediation by using the Plug-In ROD process. It is a great accomplishment for all parties (stakeholders and the three agencies) to see a concept become a reality.

Reference

1. Explanation of Significant Difference (ESD) for the Plug-In ROD for In Situ Stabilization with a Low Permeability Soil Cover System for Radiological Contaminants in Soil - K-Area Reactor Seepage Basin, WSRC-RP-99-4200, Revision 1, February 2000