



SRS Citizens Advisory Board

Environmental Remediation and Waste Management Subcommittee

**Meeting Record
September 16, 1997**

The CAB ER & WM subcommittee met on September 16, 1997 at the Cumberland Village in Aiken, SC. CAB members present included, CAB ER & WM subcommittee Co-chairs, Bill Lawless and Kathryn May and Karen Patterson. Todd Crawford, technical consultant to the CAB also attended. Attending from DOE-SR were Phil Prater, Rod Rimando, Gary Little, and Gerri Flemming. Jeff Crane attended from the U.S. Environmental Protection Agency (EPA). Brent Allen attended from the South Carolina Department of Health and Environmental Control (SCDHEC). Attending from WSRC/BSRI/BNFI were Sonny Goldston, Mary Flora, Ed McNamee, Gerry Stejskal, Bob Aylward, Tom Rehder, Brent Daugherty, Don Toddings, Bill Rajczak, and Anne Roe. Public attendees included William R. McDonell, Gerald Devitt, Russ Messick, John Adams, and Patricia McCracken. Gerri Flemming attended as the Associate Designated Deputy Federal Official, ADDFO. Kathryn May opened the meeting and asked everyone to introduce themselves.

Phil Prater discussed the Plug-In Record of Decision approach, which was developed to streamline the evaluation of similar units for remediation. The plug-in approach selects a remedy to apply to any operable unit exhibiting similar conditions such as radioactive seepage basins. The Plug-In ROD will define what the range of conditions are and will establish a process for determining if units meet the conditions. The plug-in remedy is intended to be selected prior to fully characterizing the waste units. A focused characterization will be performed, as necessary, to supplement existing data needs at each waste unit to determine whether the conditions match the pre-defined conditions established in the Plug-In ROD. If so, the waste unit will plug-in to the ROD and be remediated in accordance with requirements.

Pete Gray noted that the plug-in ROD approach could be likened to placing a round peg in a round hole. With the hole being the presumed remedy and the units that would fit the range of conditions being the pegs that would fit. Mr. Prater noted that the Plug-In approach had been successfully implemented at Hanford and Indian Bend, WA where the process was found to accelerate remedial actions, reduce the administrative burden, and ensure consistency in decision making. Mr. Prater then discussed the evolution of the Plug-In Rod approach at SRS. Bill Lawless noted that Lee Poe had done an excellent job of summarizing the Plug-In ROD approach in a letter to Mr. Lawless (see attached letter). Lastly, Mr. Prater reiterated the key features of the plug-in ROD approach for radioactive basins at SRS:

1. selects generic remedy using previous remedial decisions
2. defines a process to determine where the generic remedy should be applied
3. establishes groupings of waste units based on similar unit characteristics and contaminants
4. utilizes focused characterization data

Ed McNamee, BSRI, explained the major components to the SRS Plug-In ROD approach and the first set of selected units to utilize the Plug-In ROD approach. The first grouping of candidates consists of C, K, L, P, and R Reactor Seepage Basins, the new F & H Retention Basins, Warner's Pond, and HP-52 Ponds. Mr. McNamee explained that these units were chosen because they were high risk and there was site experience at remediating these type units (i.e. the Old F-Area Seepage Basin and the L-Area Oil and Chemical Basin). Also, since there are multiple radioactive waste units with similar contaminants they were a good choice for the Plug-In ROD approach. The in-situ containment options which are being considered include:

- soil cover/cap
- stabilization (e.g. grouting)
- on-unit consolidation
- pipeline and associated soil disposition

One concern which was brought up by Brent Allen was whether the Plug-In ROD approach was too much of a cookie-cutter, simplistic approach which would preclude the use of new and innovative technologies. It was noted that for the units being discussed containment was the desired end state; but that it might be possible on future Plug-In RODs to add a decision box to take into account new technologies. Mr. Allen asked if the Plug-In ROD approach was followed would that be the end of any consideration of a Soil Debris Consolidation Facility (SDCF) at SRS. Jeff Crane, EPA, said that it would be the end of the SDCF on a scale as originally envisioned. Phil Prater then discussed the documentation requirements for the Plug-In ROD approach. He noted the advantages of the Plug-In ROD approach was an expected \$1 million dollar documentation savings per unit and a schedule savings of two years per unit on the source or soils portion of each unit. Mr. Prater said the strategy for the groundwater portion of the units was to stay with the original schedule for groundwater cleanup since it is more complex. Therefore the Plug-In ROD approach for the first set of units would actually be an "Interim" Record of Decision or IROD.

Mr. Prater then explained the Plug-In ROD approach public involvement activities. Concerns were raised about dragging out the public involvement process. It was explained that a consolidated, streamlined approach would be preferred. Todd Crawford discussed a draft motion in support of the Plug-In ROD approach he had prepared and requested comments. One point made was that the Plug-In ROD approach had been developed in concert with EPA and SCDHEC. Other changes were suggested and noted.

A draft motion on decommissioning Three Experimental Reactors and a recommendation to prepare a strategic plan for decommissioning SRS nuclear facilities was also discussed and comments noted. Mr. Rimando noted that dispositioning was the preferred term rather than

decommissioning and that rather than consider all facilities it would be better to consider excess facilities.

A draft motion on the SRS related issues of Complex-Wide Environmental Management Integration (EMI) and the utilization of the Consolidated Incineration Facility was discussed and comments noted. The discussion centered around the complex-wide generic recommendations and the SRS specific recommendations. Brent Allen also noted the value of considering the regulatory issues connected with bringing waste to SRS from other sites.

Lastly, the status of the Heavy Water Components Test Reactor (HWCTR) decommissioning was discussed. It was noted that an explanation from DOE prior to the subcontract award had been expected on whether or not the entombment option was still viable. Pete Gray also requested a cost comparison of dismantlement versus entombment. Mr. Rimando explained that he did not have access to the bids and it would not be fair to the bidders to discuss the details even if he had the information. But Mr. Rimando said DOE would continue to update the subcommittee on the HWCTR project.

Bill Lawless closed the meeting at 9:00 p.m.

Meeting handouts may be obtained by calling 1-800-249-8155.