



Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802

FEB 24 2015

Mr. Harold Simon, Chair
Savannah River Site Citizens Advisory Board
P.O. Box A
Aiken, South Carolina 29802

Dear Mr. Simon:

SUBJECT: Citizens Advisory Board (CAB) Recommendation Number 329 – Providing Opportunity for the Public to Provide Written Comments on Savannah River Site (SRS) Cleanup Decisions (Your letter, dated 01/28/2015)

Thank you for your recommendation on providing opportunity for the public to provide written comments on SRS cleanup decisions. The Department of Energy (DOE) Savannah River Operations Office partially accepts your recommendation and provides the following responses to the recommendation:

- 1. Schedule public comment periods on documents that are relevant to the Federal Facility Agreement (FFA) and other documents that are a concern to the public in a time frame that allows the Board to take formal written action.*

We do not accept this subpart. Public comment periods conform to the requirements of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and to the enforceable project schedules and milestones in the FFA. The public is given 35 days (45 days for RCRA) to provide comments, and this can be extended upon request. This time frame is not compatible with the time needed for a presentation to the CAB on the document, and the drafting and approval of a formal CAB recommendation, particularly since there may not be a CAB meeting scheduled during the comment period.

More importantly, the public provides comments directly to DOE, and the CAB is not responsible for collecting and compiling that input before it is provided to DOE. A very valuable and appropriate role for the CAB (through its Facilities Disposition & Site Remediation Committee) would be to facilitate the public's understanding of the alternatives being considered for significant cleanup actions, thereby helping members of the public to provide input to DOE during the public comment period if they choose to do this.

Although a CAB recommendation is welcome, a formal CAB recommendation on each document is probably not feasible, and not essential to the process of public input on cleanup decisions. Comments can be, and have been, made by any individual (including CAB members) during the comment period, and they will receive the same consideration by DOE that a formal recommendation would receive.

2. Routinely schedule public meetings on documents out for public comment.

We do not accept this subpart. A public meeting, if requested during the public comment period, will be arranged to facilitate public input, as required by RCRA and CERCLA.

3. Include topics in the annual work plan of relevant committees those actions that will be proposed and made available for public comment.

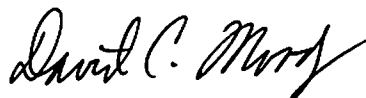
We accept this subpart. DOE will provide a list and summary of any pending cleanup decisions (and documents for public comment, with due dates) for the upcoming year, in time to be considered for incorporation into the annual work plan of the appropriate committee(s). This will allow subjects of significant interest to be identified as topics for a committee meeting during the year at a time that will support public review and comment during the time scheduled.

4. Prepare documents intended for public review and comment, using the principles described in the "Federal Plain Language Guidelines" revised in May 2011.

We accept this subpart. DOE will strive to make its documents that are available for public review and comment readable and understandable, using the principles described in the *Federal Plain Language Guidelines* revised in May 2011. Also, a Proposed Plan (draft remedial decision document) that is open for public comment will always be accompanied by a Fact Sheet to help with understanding, and an Engineering Evaluation/Cost Analysis (draft decision document for a non-time-critical removal action) will include an Executive Summary serving the same purpose.

If you have any questions, please contact me or Mr. Michael Mikolanis, of my staff, at (803) 952-8187.

Sincerely,



David C. Moody
Manager

AMIES-15-008

cc:

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