

Department of Energy

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

MAY 3 2005

Ms. Jean Sulc, Chair Savannah River Site Citizens Advisory Board 24 Harbor River Circle St. Helena Island, SC 29920

Dear Ms. Sulc:

SUBJECT: Savannah River Site (SRS) Citizens Advisory Board (CAB) Recommendation 208 -

SRS Artifact Storage and Long-Term Records Management (Your letter, 3/30/05)

Thank you for the subject recommendation regarding artifact storage and long-term records management. My response to the seven parts of the recommendation is below.

Part one requested that the Department of Energy (DOE) upgrade the climate and temperature controlled curation needs of Building 105-C or locate and move the artifacts to another facility that currently meets these requirements and provide a qualified curator to maintain the artifacts.

We recognized that Building 105-C was not in compliance with the climate and temperature control requirements in Title 36 Code of Federal Regulations (CFR) Part 79. This issue was addressed, with our Consulting Parties, by establishing the following goals in the Savannah River Site's Cold War Built Environment Cultural Resources Management Plan (CRMP):

"Assemble a curation staff, establish a curation facility, relocate and properly store the current inventory of artifacts in selected curation space (Building 105-C) in a manner that is as fully compliant with 36 Code of Federal Regulations Part 79 as practical within FY 2005, update current artifact database, complete condition reports, and identify conservation priorities." (Short-Term Goal #7); and

"Plan and seek funding to acquire and install appropriate temperature control measures, fire suppression and security systems to proposed curation space." (Long-Term Goal #3).

DOE is addressing these goals and is working diligently through WSRC to have a full-time curator by June 2005 and to relocate the more environmentally susceptible documents to a climate controlled facility. I remain committed to the remainder of the CRMP goals.

Part two requested that DOE provide a flowchart describing the process for integration of historical preservation activities for all facilities into the decontamination and decommissioning (D&D) schedule and present the process to the SRS CAB by May 24, 2005.

SRS has a process in place which integrates historical preservation activities for all facilities and we will provide a briefing, including a flowchart, on this process at the May 24, 2005, SRS CAB meeting. Every building scheduled for D&D has a formal process as part of the standard schedule. If the facility is historic, mitigating actions are included in the D&D schedule before final disposition can take place.

Part three requested that DOE, along with Legacy Management, provide a formal presentation to the SRS CAB by May 24, 2005, concerning the transfer of SRS programmatic functions and records management to Legacy Management. In addition, there was a request for a description of the process for local stakeholder input into the transfer process and accessibility of closure records, including global positioning system (GPS) coordinates for all waste units and D&D facilities.

DOE is working with the Office of Legacy Management (LM) to develop a joint presentation to the SRS CAB in the near future. I will inform you of the status at the May 24, 2005, SRS CAB meeting.

DOE documents clean-up activities in the Federal Facility Agreement Records of Decisions (RODs) which contain the requirements for long-term monitoring and maintenance of each waste closure site. DOE (Office of Environmental Management) will continue to provide oversight until the need for a transfer of responsibilities is identified. These requirements, as well as the GPS coordinates, will be addressed at that time in a Long-Term Stewardship Plan that will be governed by DOE Policy 454.1, "Use of Institutional Controls." In accordance with this policy, DOE must insure that the new owner (whether a DOE or non-DOE entity) understands and is capable of meeting its institutional control responsibilities. DOE will continue to work closely with the SRS CAB to ensure your concerns are addressed as these documents are developed.

All Federal records (both temporary and permanent), including the GPS coordinates, are subject to identification for archival and preservation by the National Archives and Records Administration (NARA) approved records schedule. DOE complies with the NARA records schedule and 36 CFR Parts 1200 to 1290, "Chapter XII NARA." DOE will work with the SRS CAB as these documents are developed. Some GPS coordinates may be sensitive due to security considerations, and they will need to be reviewed on a case-by-case basis for public access.

Part four stated, as national security issues allow, that DOE continue to provide public access to historical data through Internet access via the SRS web site. DOE should brief the SRS CAB on or before May 24, 2005, on how such information can be made available to the public in a timely manner, given the current security review requirements.

The SRS Cold War Historic Preservation Web Page, available to the public since the summer of 2004, will continue to be revised and updated with public documents, photographs, and selected lists of artifacts as these become available. We will provide a briefing to the SRS CAB on May 24, 2005, on any additions we have made and future plans we have for this web site.

Part five requested that DOE expand the CRMP to include all eligible historic properties and not restrict the eligibility to only Cold War designated facilities and properties.

DOE developed the CRMP for the treatment of its Cold War National Register of Historic Places-eligible historic properties. The SRS Cold War history information covers the time period from 1950 to 1989 (Section I.A. of the SRS Cold War Programmatic Agreement). All buildings within the D&D process are reviewed by the SRS Historical Program Office and the SRS certified historian. The CRMP has a Long-Term Goal (#14) to plan for a future SRS historical context and inventory that will address SRS programs occurring after 1989. DOE will continue to pursue this goal by reviewing later facilities as they are declared "excess" and are included in the D&D program.

Part six requested that DOE ensure that the SRS Records Administration interacts with the Artifact Selection Team (AST) and the SRS Cold War Heritage Team, and assure that historical artifacts and records receive certified archival input and oversight.

A representative from the Site Records Management Program (SRMP) has been a member of the SRS Cold War AST since it was established in July 2004. The SRMP representative has been an active member of this team since joining the group and has been very active in identifying protocols and written processes for artifact and records management for the AST. Current plans are to obtain a full-time professionally qualified curator in June 2005 to become a member of the AST and to provide certified archival input and oversight.

Part seven requested that DOE Headquarters, through Congressional legislation, ensure that the public is included as members of any Local Stakeholders Organization associated with a DOE site, starting with Rocky Flats, and that they have access to all available public records.

I have requested that the Office of the Principal Deputy Assistant Secretary for Environmental Management address this part of the recommendation.

If you have any questions, please contact me or Mr. John Knox, of my staff, at (803) 952-7235.

Sincerely,

Jeffrey M. Allison

Manager

DECP-05-45

cc: Robert King, SCDHEC James Palmer, EPA- 4 John Sylvest, SHPO