

Department of Energy

Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802
NOV 0 7 2005

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

Dear Ms. Sulc:

SUBJECT: Citizens Advisory Board (CAB) Recommendation Number 220 – National Academy of Sciences (NAS) Interim Report on Tank Waste (Your letter, 9/29/05)

Thank you for your recommendation regarding the NAS Interim Report sanctioned under the National Defense Authorization Act (NDAA) for Fiscal Year 2005. My response to each part of Recommendation 220 is provided below:

Part 1. The Department of Energy Savannah River Operations Office (DOE-SR) should not wait 5-10 years between tank waste removal and tank closure actions to determine when a tank is clean and ready for closure. DOE should ensure these actions support the Federal Facility Agreement (FFA) schedule.

The Waste Determination and supporting performance assessment will be the basis of DOE's decision that a tank is ready for closure. At the time of waste removal and tank cleaning, DOE will apply the most appropriate technology for each specific tank application. DOE will consider the risk associated with closing a tank versus waiting for advances in cleaning technologies in determining whether the tank has had highly radioactive radionuclides removed to the maximum extent practical. This is a criteria under Section 3116 of the NDAA addressed in the Waste Determination. If delaying closure of a tank is justified based on additional risk reduction, DOE is committed to approaching the South Carolina Department of Health and Environmental Control (SCDHEC) for schedule adjustments. DOE will make risk informed decisions working closely with SCDHEC concerning the closure of each tank.

Part 2. DOE-SR should continue to implement the deliquification, dissolution, and adjustment (DDA) process as long as it remains a viable part of the whole salt waste processing strategy and to minimize any use of noncompliant tanks for waste storage.

DOE intends to implement the DDA process as soon as it is authorized by DOE's approval of the Salt Determination, following completion of the consultation process with the Nuclear Regulatory Commission (NRC), and permitted by SCDHEC. Implementation of the DDA process will continue for as long as it remains a viable part of the whole salt waste processing strategy and authorized by DOE and SCDHEC. DOE continues to minimize the use of noncompliant tanks for waste storage.

Part 3. DOE-SR should demonstrate through performance assessments of the Waste Disposal System (including assessments of radionuclide and chemical quantities and concentrations, conditioning, interactions and bioavailability) that the SRS plans to dispose of waste and to close tanks at SRS are protective of health, workers and the environment. The SRS CAB expects DOE-SR to provide annual updates on the Waste Disposal System performance assessment.

DOE has demonstrated through performance assessments that disposal of the waste at the Saltstone Disposal Facility and insitu-closure of Tanks 19 and 18 will be protective of public health, workers and the environment. These performance assessments are part of the DOE and NRC consultation process under the NDAA. DOE shall provide annual updates to the SRS CAB on the Waste Disposal System performance assessments.

Part 4. DOE-SR should continue to fund research and development, and incorporate new technologies when they become available.

DOE is committed and will therefore continue to fund research and development activities toward waste treatment and removal technologies. New technologies will be implemented in the Liquid Waste Disposition Program as they become available and are appropriate for the application being sought.

Part 5. By November 15, 2005, DOE-SR provide the current expected timeline for the Waste Determination documents (Salt Determination and Tank Closure) and describe the contingencies for the potential schedule slippage and the expected impacts to the Salt Waste Processing Program and tank closure dates.

A timeline for the Waste Determinations (Salt Determination and Tank Closure), including contingencies for potential schedule slippages and program impacts, will be provided to the Board during the next meeting scheduled for November 14-15, 2005.

If you have any questions, please contact me or Mr. Doug Hintze, of my staff, at (803) 208-6076.

Sincerely,

Jeffrey M. Allison

Manager

WDPD-06-022