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

Dear Ms. Sulc:

SUBJECT: Savannah River Site (SRS) Citizens Advisory Board (CAB) Recommendation Number 224 – Draft 3116 Determination Document for Closure of Tank 19 and Tank 18 (Your letter, 11/16/05)

Thank you for your recommendation regarding the National Defense Authorization Act (NDAA) of Fiscal Year (FY) 2005, Draft Section 3116 Determination Document for Closure of Tanks 19 and 18 at SRS. Please note that actions are being taken to work through the determination process to achieve tank closures as soon as possible. My response to each part of Recommendation 224 is provided below:

Part 1. Department of Energy Savannah River Operations Office (DOE-SR) provide both tank closure modules to the South Carolina Department of Health and Environmental Control (SCDHEC) no later than October 1, 2006, and provide the SRS CAB by this same date with information to demonstrate that residual radioactivity in the tank heels meets the applicable performance objectives for tank closure.

The Tank 19 and Tank 18 Closure Modules will be finalized and available for public review after publication of DOE's final 3116 determination which is scheduled for late July 2006. DOE-SR shall provide the SRS CAB with the approved for public release draft closure modules as soon as they are provided to SCDHEC and Environmental Protection Agency (EPA). The Closure Modules will contain information demonstrating that residual radioactivity in the tank heels meets the applicable performance objectives for tank closure.

Part 2. DOE-SR commit to providing all necessary resources to address Nuclear Regulatory Commission's (NRC) Request for Additional Information (RAI) by April 1, 2006.

DOE-SR is committed to providing the necessary resources to address NRC RAI in a timely fashion, and our response is currently scheduled for completion by April 2006.
Part 3. DOE-SR commit to recapturing as much of the closure schedule as possible and strive to meet the existing Federal Facility Agreement (FFA) deadlines for tank closure but, in any event, commit to finishing Tank 19 and Tank 18 closure no later than the end of FY 2007.

The current schedule for completion of Tank 18 and 19 closure extends beyond the FFA commitment dates. DOE-SR is committed to accelerating the closure schedule for Tanks 18 and 19 to the extent practicable in order to achieve the existing FFA deadlines. Recently, DOE-SR identified actions recapturing approximately 2 months of the closure schedule and anticipates closure of these two tanks by the end of FY 2007.

Part 4. SCDHEC weigh the reasons why DOE-SR has been unable to meet the FFA deadlines for Tank 19 and Tank 18 closure before taking any enforcement actions.

DOE-SR has provided SCDHEC a copy of the Recommendation to address Part 4.

If you have any questions, please contact me or Mr. Doug Hintze, of my staff, at (803) 298-6076.

Sincerely,

[Signature]

Jeffrey M. Allison
Manager

WDPD-06-043