



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

JUN 29 2012

Dr. Donald N. Bridges, Chairperson
Savannah River Site Citizens Advisory Board
P.O. Box A
Aiken, South Carolina 29802

Dear Dr. Bridges:

SUBJECT: Citizens Advisory Board (CAB) Recommendation Number 289 – Operating History, Safety and Environmental Studies Assessment

Thank you for your recommendation on the Operating History, Safety and Environmental Studies Assessment. Savannah River Site (SRS) operations are conducted in a manner that minimizes contaminant exposure to Site workers and the public, and releases to the environment. Over the years, a number of independent agencies and organizations have conducted studies to assess the impact of Site operations on SRS workers, the public and surrounding environment. The Department of Energy Savannah River Operations Office (DOE-SR) has elected not to summarize the conclusions in these studies to preclude the potential for misinterpretation. The following comments with references to these independent studies are provided in the response to your recommendation.

1. Assess existing studies and reports to determine:

- *What is the impact of the low levels of radiation exposure to Site workers over the Site's 40-year production period; including Department of Labor Bureau of Labor Statistics data on SRS worker compensation cases by year, beginning with the opening of the Site and ending with the most current available data?*

Since the SRS began operations in the 1950's, DOE (and its predecessor agencies), and the Site contractors have had a policy to maintain radiation exposure to Site workers, members of the general public, and the environment As Low As Reasonably Achievable (ALARA) taking into account social, technical, economic, practical, and public policy considerations. ALARA is not a limit, but rather a process fully supported by Site management and workers which has the objective of maintaining doses as far below the applicable limits as reasonably achievable, and that there is no radiation exposure without commensurate benefit.

The impact of low levels of radiation exposure to Site workers is provided by the National Institute of Occupational Safety and Health Occupational Energy Research Program as noted on the Centers for Disease Control and Prevention (CDC) website at: <http://www.cdc.gov/niosh/oerp/savannah.htm>. DOE-SR does not analyze the data associated with SRS worker compensation cases; however, DOE-SR does analyze the number of claims, their associated processing costs, and the timeliness of claims processing.

JUN 29 2012

- *What is the impact of the low levels of off-site radiation to the surrounding communities?*

The DOE-SR and its contractors are committed to protecting the public and environment from excessive exposure to contaminants from SRS activities. The SRS has conducted a robust environmental monitoring program since 1954 that identifies, qualifies, and quantifies chemical and radioactive contaminants released from SRS operations. Monitoring program results are available annually to the public on the SRS website at: <http://www.srs.gov/general/pubs/ERsum/index.html>

Independent assessments of the SRS Environmental Monitoring Program results and environmental and health impacts from SRS operations have been conducted by the CDC and the Agency for Toxic Substances and Disease Registry (ATSDR). Dr. John Till, Risk Assessment Corporation, led the CDC Three-Phase Dose Reconstruction Project to assess the radiological and chemical impact of SRS operations to the surrounding communities from 1954 to 1992. ATSDR has issued two Public Health Assessments (PHA's): "Evaluation of Offsite Groundwater and Surface Water Contamination at the SRS" and "Exposure to Contaminants in Biota Originating from the SRS." The ATSDR is currently conducting a third PHA on air contaminants. The ATSDR issued one Public Health Consultation (PHC) – "Tritium Releases and Potential Offsite Exposures." The completed phases of the studies did not identify any significant impacts from SRS exposures. The CDC report is available at: http://www.cdc.gov/nceh/radiation/brochure/profile_savannah.htm. The referenced ATSDR PHA's and PHC reports are available on ATSDR's website at: <http://www.atsdr.cdc.gov/HAC/PHA/HCPHA.asp?State=SC>

The South Carolina Department of Health and Environmental Control (SCDHEC) conducts independent oversight of the SRS Environmental Monitoring Program through the agency's Environmental Surveillance Oversight Program (ESOP). SCDHEC's ESOP monitoring activity descriptions and associated reports are available at: <http://www.scdhec.gov/environment/envserv/esop.htm>.

Other studies, such as the Radiation and Public Health Project - "Assessing Change In Environmental Radioactivity And Health Near the Savannah River Site" (2012) are available on the Blue Ridge Environmental Defense League's website at: <http://www.bredl.org/nuclear/SRS.htm>

- *What is the impact of other environmental hazards to the areas away from the Site?*

DOE-SR is unaware of impacts from any Site environmental hazards to areas away from the Site.

2. *Determine if any additional studies would be necessary to provide any additional useful information.*

SCDHEC, the Georgia Department of Natural Resources, U.S. Environmental Protection Agency or ATSDR would make any determinations of the need for additional studies.

JUN 29 2012

3. *Develop a summary report which will list and summarize results and findings from the necessary supporting data.*

Summary results and findings are available in the referenced documents identified in the response to Part 1 of this recommendation.

4. *Provide a list of definitive statements on the impacts of Site operations.*

Any impacts from Site operations are identified in the referenced documents identified in the response to Part 1 of this recommendation.

5. *Involve other external parties in the preparation of such a summary report and the review of underlying supporting data.*

The external parties identified in Part 1 of the response to this recommendation prepared the cited reports which contain their own conclusions.

If you have any questions, please contact Karen Guevara of my staff at (803) 952-9611.

Sincerely,



David C. Moody
Manager

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