

Department of Energy

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

NOV 3 0 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 293 – Remedial Actions and Clean-up of 235-F, Your letter 09/27/12

Thank you for your recommendation regarding the clean-up of the former Pu-238 processing and storage areas of Building 235-F. We accept this recommendation as a Savannah River action. The Departmental responses to the recommendation are stated below.

1) Identify and implement plans for short term measures that could reduce the hazards identified in the Safety Board's Recommendation 2012-1.

The Department has taken action to form an Integrated Project Team that will develop near and long term strategies, and means to perform measures that will reduce the hazards identified in Recommendation 2012-1. Near term all transient combustibles have been removed from the facility, and control limits for future work will be implemented in facility safety documentation. Efforts are underway to remove fixed combustibles that are not directly necessary from the facility. An evaluation of Building 235-F facility fire detection and alarm systems functionality and maintainability relative to the clean-up mission is in progress.

The Department is in the process of finalizing an implementation plan that addresses the hazards identified in Recommendation 2012-1, and will brief the CAB when that process is complete.

2) Reassess the plans for Decontamination & Decommissioning (D&D) of Building 235-F with more emphasis placed on earlier D&D of Building 235-F.

While Savannah River Site (SRS) has extensive experience with D&D of facilities containing Pu-238, the D&D of cells and ductwork containing residual Pu-238 has not been attempted. Given the dispersible nature ("aerosol" form) of the remaining Pu-238 in Building 235-F, the hazards associated with D&D activities are such that once started they should be continued to the desired endpoint. For the past 20 years SRS has safely managed the risk associated with the residual Pu-238 materials in cells and associated

duct work. The Department's response letter to Recommendation 2012-1 dated July 10. 2012, stated the Department of Energy (DOE) will to the extent feasible reduce the radiological hazards from residual contamination and the fire hazards due to excessive combustible materials and electrical sources. The Department is currently developing an implementation plan to move forward with deactivation of the 235-F cells over the next five (5) years, and has made significant progress with the removal of combustible materials from the facility. Building 235-F Risk Reduction efforts is included in the SRS Integrated Priority List and accomplished as funding is made available.

3) Advise the CAB of other measures that could be taken to address concerns addressed in the Safety Board's Recommendation 2012-1.

The Department is in the process of finalizing an Implementation Plan that details the measures that could be taken to address concerns identified in the Safety Board's Recommendation 2012-1. Once the plan is finalized the Department will be able to advise the CAB.

4) Advise the CAB, no later than the January 2013, of the cost and timeline of implementing the Safety Board's Recommendation 2012-1, and how other projects will be impacted by the implementation of said Recommendation.

The Department will be able to advise the CAB of our plans to include cost and timeline for implementing Recommendation 2012-1 and impacts as requested.

As always, the DOE welcomes your input as we continue to work to address the clean-up of Building 235-F.

If you have any questions please contact me, or have your staff contact Patrick McGuire at (803) 208-3927.

Sincerely.

David C. Moody

Manager

cc:

Melissa Nielson, (EM-3.2), DOE-HQ Catherine Brennan. (EM-3.2), DOE-HQ Catherine Templeton, SCDHEC Gwen Keys. EPA Albert Frazier, GADNR