



## Recommendation No. 105

November 16, 1999

### Tank 19 Closure

#### **Background**

The board has been instrumental in encouraging DOE-SR to close its old high level waste tanks (see motions 15, 43, 78, 88). The board has obtained independent scientific peer reviews (ISPR's) on the closure process and consequences (by scientists at Georgia Tech and UC-Berkeley); and South Carolina Department of Health and Environmental Control (DHEC) has approved both the overall closure plan and individual tank modules for tanks 20 and 17. This has resulted in the formal closure of high-level radioactive waste tanks 20 and 17 during 1997, the first two regulated closures of high-level waste tanks in the U.S. and possibly the world. Today the board is considering the early closure of Tank 19.

Tank 19 is a Type IV (single-wall) tank located in the same "4-pack" with Tanks 17, 18, & 20 in F-Area. It is committed for closure in accordance with the Federal Facilities Agreement (FFA) for Fiscal Year 2003 (i.e., FY03). The current plan for Tank 19 in the current Fiscal Year (FY00) is to have all of its waste removed and ready for closure. That is, the minor residual wastes that will remain in tank 19 must meet DOE's performance requirements and "incidental waste" criteria in DOE Order 435.1.

However, based on comments made at an ERWM subcommittee meeting, DOE-Savannah River is working with DOE-Headquarters on the feasibility of actually closing Tank 19 two years earlier, in Fiscal Year 2001 (FY01). In order for this early closure to occur, a number of issues need to be resolved, some of which are as follows: the Record of Decision for the Tank Closure EIS has to be issued (the tank closure EIS was expected to be presented to the public during August 1999, and the ROD subsequently published by December 1999; however, DOE-HQ has yet to release the draft EIS to the public); the Nuclear Regulatory Commission review should be completed (the NRC staff has completed its deliberations and forwarded its conclusions to the NRC Commissioners); the "Industrial Wastewater Closure Plan for F- and H- Area High Level Waste Tank Systems" (General Closure Plan) required under DOE Order 435.1 requirements must be approved by the DHEC and Environmental Protection Agency (EPA) prior to approval by DOE-HQ; the "incidental waste" basis must be approved by the SRS manager; and the Tank 19 Module must be prepared by SRS, submitted to the regulators, and approved by them.

Of great concern to the Board is the delay by DOE-HQ (because of higher priority work in the complex) in releasing the draft EIS to the public for a timely review. In a motion last winter (Recommendation #78, January 26, 1999), and in agreement with SC-DHEC, the Board concluded that there was no need to do an EIS since no new findings were expected, and as suggested by SC-DHEC, adequate alternatives existed instead of an EIS. However, the Board was led to believe that the EIS was a high priority for DOE-HQ. Yet, while DOE-SR met its obligations on time as requested in the Board's recommendation last winter, DOE-HQ is now four months late in releasing the EIS for public review. In that DOE-HQ is also required to review the revisions to the General Closure Plan for all tanks at SRS, the Board is discouraged by DOE-HQ's lack of a timely response to SRS issues.

#### **Recommendation**

The SRS CAB recommends that DOE:

1. Expedite the release of the EIS from DOE-HQ in order that the public review of the EIS can be commenced.
2. Provide an update to the board by its January 2000, meeting on the release of the EIS from DOE- Headquarters.
3. Expedite the review of the General Closure Plan by DOE- Headquarters. Encourage DOE- Headquarters to provide the site and the Board with confidence that the Closure Plan will receive a timely review that does not interfere with the early closure of Tank 19 (i.e., request a schedule for the review from DOE-HQ.)
4. Expedite the waste removal from Tank 19 in Fiscal Year 2000 and close Tank 19 in Fiscal Year 2001.

5. Provide updates to the Board on the closure of Tank 19 (upon completion of waste removal from Tank 19; the completion by DOE-Headquarters of its review of the General Closure Plan; the beginning of closing Tank 19; and the end of the closure of Tank 19).

**Closure Criteria**

1. The completion of waste removal from Tank 19.
2. The completion of the review of the General Closure Plan by regulators and DOE-Headquarters.
3. The completion of the closure of Tank 19.

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**Agency Responses**

[Department of Energy-SR](#)