



SRS Citizens Advisory Board

Environmental Remediation and Waste Management Subcommittee

Meeting Summary

January 11, 2000
North Augusta Community Center
North Augusta, SC

CAB Members

Bill Lawless*
Kathryn May*
Karen Patterson*
Maria Reichmanis*
Jimmy Mackey
Wade Waters

Stakeholders

Lee Poe
Mike French
Bill McDonell
Meryl Alalof
Todd Crawford
Perry Holcombe
Patricia McCracken
Rick McLeod

DOE/Contractors

Julie Petersen, DOE
Angelia adams, DOE
Dennis Godbee, DOE
Thomas Johnson, Jr., DOE
Howard Gnann, DOE
Dawn Gillis, DOE
Donna Brumley, DOE
Gerri Flemming, DOE
John Reynolds, DOE
Sonitza Blanco, DOE
Brian Hennessey, DOE
Claudette Hopkins, BSRI
Kim Wierzbicki, BSRI
Robert Cordani, BSRI
Bob VanPelt, BSRI
Jim Fay, BSRI
Chris Bergren, WSRC
Gerry Stejskal, WSRC
Kelly Way, WSRC
Anna Dixon, WSRC
Bruce Lawrence, WSRC
Dave Freeman, WSRC
Sonny Goldston, WSRC
Ken Rueter, WSRC
Sheila McFalls, WSRC
Bob Aylward, WSRC
Helen Villasor, WSRC

Regulators

Craig Marriner, SCDHEC
None, EPA

* Denotes ER&WM Subcommittee Member

Jimmy Mackey opened the meeting with introductions of all attendees, including three new candidates who are under consideration for CAB membership.

Schedule Review: Helen Villasor announced that the ER&WM meeting schedule matrix was available; however, with the pending reorganization of the new CAB committees, the only ER&WM meeting discussed was the subcommittee meeting on January 24, 2000 at Hilton Head Island. Ms. Villasor noted that a review of the pending draft motions going before the full Board on January 25, would be the only item discussed; Maria Reichmanis will chair the meeting. Ms. Villasor also announced that SRS's Resource Conservation and Recovery Act (RCRA) Permit Part B expires in 2000 and that a Public Meeting on the Renewal Application will be held on February 1, 2000 at the North Augusta Community Center immediately preceding an ER&WM Subcommittee Meeting.

Environmental Assessment (EA) for Alternative Canister Storage Facility: In response to a stakeholder request for information on the Environmental Assessment (EA) for an alternative canister storage facility, Sonitza Blanco discussed the current plan for Defense Waste Processing Facility (DWPF) canister storage. Ms. Blanco also noted that the alternative storage plan for DWPF canisters would add flexibility to the DWPF production plan in case goals for higher production are set (e.g., 300 canisters per year). The EA will be presented for public comment by March 2000 and all National Environmental Policy Act (NEPA) actions will be complete by June 2000.

Issues: None.

Actions: Ms. Blanco was invited to return in March to provide the subcommittee with an update on the status of the EA and the alternate approach to DWPF canister storage.

Integrator Operable Units (IOUs): Bill Lawless introduced Thomas Johnson, who presented the status of the Integrator Operable Units (IOUs) to the subcommittee on November 2, 1999. In response to a stakeholder request, Mr. Johnson noted that he brought copies of the November 2, 1999 presentation to this meeting since the subcommittee has expressed an interest in developing a draft motion on the IOUs for consideration by the full Board at its January meeting at Hilton Head Island.

Issues: None.

Actions: Develop a draft motion on the IOUs.

Facility and Asset Disposition Program: Angelia Adams provided an update on SRS's Facility and Asset Disposition Program. Back in November 1997, the CAB sent Recommendation 49, "Dispositioning of Excess and Surplus Facilities at SRS" to DOE. Ms. Adams reviewed the recommendation's details, which were to prepare a strategic plan for excess facility disposition; to describe the program's risk ranking and prioritization process; and to decommission three reactors in Building 777-10A. In summarizing all of the activities the program has taken to address Recommendation 49, Ms. Adams requested that the subcommittee consider closing Recommendation 49. Mr. Adams also noted that the Heavy Water Components Test Reactor has been placed in safe storage. The Facilities and Asset Disposition Program is being actively managed to prioritize and mitigate hazards and minimize mortgage costs associated with facilities placed on the Fiscal Year 1999 Risk Rating Listing.

Issues: Stakeholders need a better explanation of SRS's dispositioning process

Actions: Interact with the Risk Management and Future Use Subcommittee to ensure public is familiarized with the process SRS uses to disposition facilities. Ensure that the Facility and Asset Disposition Program is addressed in the SRS Strategic Plan, which is currently under development.

Proposed Environmental Protection Agency (EPA) Rule on Mixed Waste (MW): Addressing a Federal Register notice published on November 19, 1999, requesting public comment, Bruce Lawrence outlined two major parts of the proposal which include Part 1, Treatment and Storage and Part 2, Transportation and Disposal of MW. Part 1 addresses only Nuclear Regulatory Commission (NRC)-licensed facilities. Part 2 could be applicable to DOE if MW is sent to a NRC-licensed disposal facility. EPA comment areas include how the dual regulation of MW should be addressed; when should radioactively decayed waste reenter RCRA; should the loss of exemption be more broad; should the proposal be applicable to heavy water contaminated with naturally-occurring or Accelerator-produced Radioactive Material or NARM as it is commonly known; and how should soils be included. Mr. Lawrence concluded by indicating that SRS is preparing comments, which are due to DOE-HQ by January 21, 2000. However, Mr. Lawrence said that along with DOE-SR's input, DOE-HQ indicated it would be willing to wait until January 26, 1999, after the Board meeting, to accept a CAB recommendation as public comment requested by the Federal Register notice.

Issues: An exemption from RCRA is being offered by EPA for the storage and treatment of low-level mixed waste (LLMW) being generated, stored or treated onsite by a NRC or Agreement State licensee (South Carolina is an Agreement State); as currently proposed in the Rule, DOE would not qualify for this exemption regarding storage and treatment. A second exemption from RCRA for the transportation and disposal of LLMW, including wastes generated by DOE is being offered if the waste meets the waste acceptance criteria of a low-level radioactive waste disposal facility (LLRWDF) licensed by NRC or an Agreement State. As applied to SRS, the site must claim an exemption to RCRA.

Actions: Provide a copy of SRS comments on the Proposed Rule to the ER&WM Subcommittee as soon as it is available. Provide a copy of draft motion or recommendation to DOE-HQ by January 26, 2000. All comments are due to EPA by February 17, 2000.

A-Area Burning/Rubble Pits (731-A/1A and Rubble Pit (731-2A) Operable Unit Interim Action Proposed Plan: Donna Brumley provided a unit history for each of the pits under consideration in the Interim Action Proposed Plan. Focusing on the contaminants of concern, which are benzo(a)pyrene-contaminated soil that may cause significant risk to current and future workers (Pit 731-2A only) and trichloroethylene (TCE) in the water table aquifer, Ms. Brumley presented a graphic that explains the need for early action. The preferred remedies include:

- Soil - Final Action (soil cover over Pit 731-2A) to eliminate risk to workers during groundwater remediation
- Groundwater – Interim Action to include Air Sparging with staged active/passive soil vapor extraction
 - Hot Spot remediation – (>100 ppb)
 - Provide data supporting final remedy

Issues: Public comment period ends January 19, 2000.

Actions: The CAB will need to request an extension of the public comment period. Develop a draft motion to endorse Interim Action. Look at cost analysis to determine if action should be performed now versus any future treatment that would clean up all of Lost Lake.

Status of CAB Recommendation 93 – "FFA Modification Feasibility Study Scoping and Primary Document Quality": Brian Hennessey addressed the status of CAB recommendation 93, "FFA Modification Feasibility Study Scoping and Primary Document Quality" by first providing the background behind the EPA, SC DHEC and DOE temporarily suspended schedules on 11 units back in May 1999. The CAB had recommended no more suspensions, provide causes of suspension, restart work by November 15, 1999 (complete) and provide annual updates beginning September 1, 2000. Originally, the suspension was requested by the regulators because there were difficulties transitioning from Remedial Investigations (RIs) to Feasibility Studies (FSs) (unclear problem definition), continuous delays and major

revisions, ineffectual Corrective Measure Studies (CMS)/FS Scoping and inadequate CMS/FS documentation. To address the challenge, a Remedy Evaluation Design (RED) Team was formed to evaluate problems and develop solutions. From May 18, 1999, when the EPA/SC DHEC letter announced the suspension, to December 30, 1999, when Appendices D & E were approved, a series of Red Team meetings occurred to develop a new decision-making approach. As a result, a core team approach to decision making was established, the RI/FS meeting framework was defined, and an Operable Unit (OU) Scoping Summary, which captures salient points about real environmental issues was developed. Mr. Hennessey reported that all of the units in suspension, which now have approved implementation schedules, are no longer considered to be in suspension (effective January 11, 2000).

Issues: Define the public's role in this new approach. Determine if more than four months were lost during the suspension. The subcommittee has not seen any facilities up for public review since last summer when it attempted to address TNX.

Actions: Provide the CAB with results of the "time out" by August or September 2000. Assure the CAB that no more breakdowns will occur and that the issue has been resolved. Consider a motion for closure at that time.

Salt Processing Technology Replacement Status of Focus Group: Before Lee Poe began an update of the Salt Processing Technology Replacement Focus Group, Bill Lawless commended the group for its diligence and integrity to the work that has been accomplished to date, and expressed his appreciation for the support the group has provided to the CAB. Mr. Poe then explained that he would be presenting in lieu of Ethan Brown, the Focus Group's Lead, who was out of town on travel. Mr. Poe explained that the group has been meeting regularly and has determined that the present delays in DOE's decision process will continue and lead to increased risk to workers and public; require more money and thus compete with other SRS programs; and will also result in delays in meeting regulator commitments. In addition, Mr. Poe said that the Focus Group's evaluation of risks resulted in the group's belief that the selected technology could possibly create another "In-Tank Precipitation situation" and in terms of safety, there may be a delay in removal of waste from the old High Level Waste (HLW) tanks until 2018, with all waste being removed by 2022. In its evaluation of costs, Mr. Poe mentioned that while it is not certain that new tanks will be built, it appears there is no alternative and that Congress will have to commit to consider the option in the very near future given the amount of time it would take to construct the tanks.

Issues: The Focus Group is interested in endorsing a public education forum but not until the fall as a path forward is still under development by SRS.

Actions: The Focus Group will commit to the salt processing schedule as soon as possible to minimize all listed risk. The Focus Group will continue to brief the subcommittee as appropriate or requested. Continue development of a draft motion for presentation to the Board at the January CAB meeting.

Public Comments: Patricia McCracken publicly commended Helen Villasor, WSRC Public Involvement support staff, for her conscientious and timely responsiveness to stakeholder requests.

Jimmy Mackey adjourned the meeting at 9:15 p.m.

Meeting handouts may be obtained by calling 1-800-249-8155.