Presentation to the Savannah River Site Citizens Advisory Board

Tank Closure Update
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Provide updated information concerning Tanks 18 and 19 in F Tank Farm

- Regulatory Documentation Path (decisions to be made)
  - DOE’s Waste Determination
  - DOE’s NEPA Supplement Analysis
  - DOE’s Decision to Close F Tank Farm
  - SCDHEC’s approval of Tanks 18 and 19 Closure Module
  - DOE/SCDHEC/EPA agreement to cease waste removal in Tanks 18 and 19
  - DOE’s authorization to close Tanks 18 and 19

Path Forward
DOE-SR’s Regulatory Documentation Path to Waste Tank Removal From Service

NRC Monitoring in conjunction with SCDHEC

- Approved
- In Progress

Legend:
- DOE
- EPA
- SCDHEC
- NRC

Diagram shows various steps and documents involved in the regulatory process, including
- NEPA Record of Decision
- Waste Determination
- DOE Closure Documentation
- South Carolina Pollution Control Act General Closure Plan
- DOE Closure Authorization Tier 1
- DOE Closure Authorization Tier 2
- Final Configuration Report
- Remove Tank System from Wastewater Permit
- Explanation of Significant Difference

Documents and processes mentioned:
- DOE-SR's Regulatory Documentation Path to Waste Tank Removal From Service
- Interim Record of Decision
- IssueRCRA Hazardous Waste Permit Modification (SCDHEC)
- PTECess Wastewater Disposal (EPA)
DOE’s Waste Determination

- Regulatory Driver: Section 3116(a) of the National Defense Authorization Act for Fiscal Year 2005
- Decision: The Secretary of Energy, in consultation with the Nuclear Regulatory Commission (NRC), may determine that the residual waste, tanks and ancillary equipment in F Tank Farm at the time of closure are not high level wastes if the criteria in Section 3116(a) are met.
- Status: DOE is carefully considering the NRC’s Technical Evaluation Report (TER)
- A decision by the Secretary of Energy is anticipated early next year (Jan/Feb 2012)
- DOE will provide public notice of the Secretary’s decision and place supporting documents for public access at: http://sro.srs.gov/f_htankfarmsdocuments.html
DOE received NRC’s consultative TER on October 27, 2011
DOE is carefully considering the NRC consultative TER
DOE will factor NRC’s recommendations, as well as public comments into its decision-making process, as appropriate
DOE remains committed to protecting DOE workers, members of the public, and the environment
DOE remains committed to reducing the risk associated with the storage of waste in the aging tanks at SRS
DOE will work with SCDHEC and EPA pertaining to NRC’s Tank 18 recommendations to facilitate all agencies decisions
DOE’s NEPA Supplement Analysis

- Regulatory Driver: National Environmental Policy Act (NEPA)
- Decision: NEPA requirements have been met
- Status: Supplement Analysis in process.
- Approval by DOE Savannah River Operations Office Site Manager scheduled for Jan/Feb 2012
- DOE will publish an Environmental Bulletin and post for public access
DOE’s Closure of F Tank Farm Decision

- Regulatory Driver: DOE Order 435.1 and Manual 435.1-1
- Decision: DOE’s authorization to proceed with closure of the F Tank Farm (Tier 1 Authorization)
  - Identify all applicable closure requirements
  - Document how requirements will be met
  - Identify any special conditions or limitations
  - Authorize Savannah River Operations Office to proceed
- Status: Tier 1 Authorization document in process.
- Decision is made by the Assistant Secretary for Environmental Management (EM-1) and is scheduled for Jan/Feb 2012
SCDHEC’s Approval of Tanks 18 and 19
Closure Module

- Regulatory Driver: Pollution Control Act, Industrial Wastewater Regulations
- Decision: SCDHEC’s approval to close Tanks 18 and 19
- Status:
  - Closure Module has been reviewed by SCDHEC and EPA
  - Public comment period October 31 – December 15, 2011
  - Public meeting tonight at Aiken Municipal Building, 6:00 pm
- Decision is made by SCDHEC’s Director of Water Facilities Permitting and is anticipated by March 2012
- DOE post for public access at:
  http://sro.srs.gov/f_htankfarmsdocuments.html
DOE/SCDHEC/EPA Agreement to Cease Waste Removal

- Regulatory Driver: Federal Facility Agreement (FFA)
- Decision: Waste removal activities may cease for a specified tank or system
- Three agencies mutually agree: DOE, SCDHEC, and EPA
  - SCDHEC documents with approval of Closure Module
  - EPA documents in a Letter to DOE
  - DOE documents in Tier 2 Authorization
- Agreement needed by March 2012 to support meeting FFA commitment
DOE’s Authorization to Close Tanks 18 and 19

- Regulatory Driver: DOE Order 435 and Manual 435.1-1
- Decision: DOE’s authorization to proceed with closure of Tanks 18 and 19 (Tier 2 Authorization)
  - Document that all requirements have been met
  - Authorize and direct Operating Contractor to close the tanks
- Status: Pre-requisites underway
- Decision is made by Savannah River Operations Office Site Manager and is scheduled for April 2012 to support meeting FFA commitment
Path Forward

- DOE is carefully considering NRC’s TER as well as public comments and will factor into all upcoming FTF decisions, as appropriate. (Jan/Feb 2012)
- Support completion of SCDHEC, EPA and DOE Tanks 18 and 19 decisions (March/April 2012)
  - Public meeting tonight
- DOE remains committed to protecting DOE workers, members of the public, and the environment
- DOE remains committed to reducing the risk associated with the storage of waste in the aging tanks at SRS
- DOE’s goal is to meet FFA commitment (December 2012)