



SRS Citizen's Advisory Board

Savannah River Site Citizens Advisory Board

Recommendation 192 Prioritizing D&D Activities

Background

The Facilities Disposition and Site Remediation (FD& SR) Committee of the Savannah River Site Citizens Advisory Board (SRS CAB) addresses the remediation of contaminated areas at SRS including various types of waste units, groundwater and surface water contamination. Included under this Committee are issues related to the Federal Facility Agreement (FFA) and risk management/risk assessment, funding issues, regulatory issues and any/all crosscutting issues as they may pertain to environmental restoration by the Westinghouse Savannah River Company's (WSRC) Soil and Groundwater Closure Projects (SGCP). This committee also addresses deactivation and decommissioning of site facilities by WSRC's Site Deactivation and Decommissioning (D&D). The two top priority issues for this committee for CY2004, as selected by the SRS CAB, are the deactivation and decommissioning activities and the area closure concept (Ref. 1). Deactivation and decommissioning includes actions taken to reduce risk and costs, following shutdown of a facility and bringing it to a planned end state. The Area Closure concept is part of the Comprehensive Cleanup Plan (Ref. 2) where optimizations can be attained within the D&D and SGCP activities as whole areas are completed before moving to another. On May 20, 2003, Revision 0.a of the SRS Environmental Management (EM) Integrated Deactivation and Decommissioning Plan (D&D Plan) was issued for the Citizens Advisory Board (CAB) and SRS review (Ref. 3). The Plan defines the appropriate end states for all EM facilities and integrates the D&D program with existing waste site cleanup plans.

Comment

On July 22, 2003, the SRS CAB adopted Recommendation #167 in support of the integrated D&D Plan. However, the CAB recommended that DOE-HQ and DOE-SR should ensure that the SRS D&D Program is focused on risk reduction and mitigation and not merely on reducing the site "footprint" (Ref. 4). Unfortunately, it appears that SRS is not embracing this concept. For example, Site D&D staff were moved out of Building 730-M and into portable office trailers so Building 730-M could begin D&D activities. This building is 15 years old and is far from being "old and decrepit" as is 703-A, the main administration building now undergoing D&D. Buildings 730-M, 705-A (next to 730-M), and 742-A (across Road 1-A from the previous two) are scheduled for D&D prior to October 2006 (Ref.2). These facilities are more modern and viable structures that would easily blend into the "footprint" of nearby buildings 703-41A, 703-42A, 703-46A, and the entire SRTC complex, that are not scheduled for D&D until FY07-FY25. The SRS CAB questions the prioritization approach to this type of D&D activity, especially when personnel have to be moved from "permanent" buildings into trailers, which are much less conducive to and effective for efficient work.

Recommendation

The SRS CAB offers the following recommendations:

1. DOE-HQ and DOE-SR should closely review its D&D prioritization policy/strategy. Again, the D&D focus should be on risk mitigation and reduction and not merely on reducing the site "footprint" via D&D of selected, still viable structures.
2. By July 27, 2004, DOE-SR provide the CAB and the general public additional details on its D&D prioritization activities. Specifically, life cycle costs for continued housing of evicted staff and those for D&D of the buildings (730-M and 742-A) should be provided along with projected life cycle cost savings from elimination of the structures. Capital costs for replacement of these buildings is also requested.

References

1. Facilities Disposition and Site Remediation (FD& SR) Committee 2004 Work Plan.
2. Savannah River Site Comprehensive Cleanup Plan, WSRC-RP-2003-4128, Revision 1, February 2004.
3. Savannah River Site Environmental Management Integrated Deactivation and Decommissioning Plan, WSRC-RP-2003-00233, Revision 0.a, May 2003.
4. Citizens Advisory Board Recommendation No. 167 (adopted July 22, 2003), "Deactivation and Decommissioning Plan".

Agency Responses

[Department of Energy-SR](#)