



## **SRS Citizen's Advisory Board**

### **Savannah River Site Citizens Advisory Board**

#### **Recommendation 207 Planning and Scheduling To Complete SRS Cleanup**

##### **Background**

After 40 years of producing nuclear materials for defense and non-defense uses, the Savannah River Site (SRS) shifted its strategic direction and resources from nuclear materials production to cleanup of the nuclear waste and environmental contamination created during production. The start of the SRS cleanup began in 1981 when the site began an inventory of waste units. Since then, SRS has established a successful environmental restoration program that is focused on the cleanup of soils and groundwater contamination.

Remediation of the waste sites and groundwater is regulated under the Resource Conservation and Recovery Act (RCRA) and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The site has identified 515 waste and groundwater units that require remediation. To date, 316 sites have been remediated. When required response actions are complete, the ultimate goal is to receive final closure under RCRA or petition for deletion from the *National Priorities List (NPL)*, a listing of Superfund (CERCLA) sites (Ref. 1) that includes the SRS.

An existing RCRA permit includes provisions for addressing releases from hazardous waste management facilities and solid waste management units. The South Carolina Department of Health and Environmental Control (SCDHEC) issued the SRS RCRA permit in 1987 (and modified it in 1992), which required SRS to begin its RCRA cleanup program. Under the RCRA Permit and the State of South Carolina's oversight, SRS is actively remediating contaminated groundwater plumes in various areas around the site.

In 1993, the Department of Energy (DOE), the US Environmental Protection Agency (USEPA), and SCDHEC ("the three Parties") entered into an agreement that describes how the SRS will cleanup its inventory of waste and groundwater units. This agreement, known as the Federal Facility Agreement (FFA), governs the corrective/remedial action process from site investigation through site remediation in accordance with guidelines set forth under CERCLA and RCRA.

The FFA generally provides the statutory, regulatory, and policy requirements for remedial cleanups; the roles and responsibilities of each party to the agreement; the scope of work to be accomplished; and the milestones to be met. The FFA also represents a compliance agreement between USEPA, SCDHEC, and the DOE with enforceable milestones. Penalties can be assessed against DOE for noncompliance with FFA requirements and enforceable milestones (Ref. 2).

##### **Comments**

Because of the increasing number of long-term remedies, such as groundwater extraction, treatment and re-injection systems, with annual recurring costs, SRS may not be able to maintain the same level of remedial effort with the same level of funds budgeted by Congress. SRS completed many of the short-term, less costly containment and control remedies at waste units early in the cleanup process. With rising costs for long-term, more expensive response actions, the availability of funds to increase or even maintain the same number of action starts under the current funding level will be difficult.

The SRS CAB questions why the number of waste units being started vary from year to year and why some of the years have zero starts (see attached FY Remedial Activities Scheduled to Start table, dated March 29, 2005). The SRS Citizens Advisory Board is concerned about the

large amount of starts facing SRS in the out-years (approximately 40% of the sites being started in the last five years) and the uneven sequencing of action starts. The SRS CAB believes that a more consistent leveling-out of the amount of work and associated funding is needed. The proper sequencing of the work scope is very important if DOE is to meet the planned 2025 date for completion of environmental restoration, facility deactivation and decommissioning activities at SRS.

### **Recommendation**

The SRS CAB recommends that DOE:

1. Demonstrate to the SRS CAB on or before September 26, 2005, that proper planning and coordination between the three parties are taking place so that consensus on operational, logistical, and financial details will be reached to assure completion of cleanup activities at the SRS by 2025.
2. Present to the SRS CAB on or before September 26, 2005, planned out-year schedules and cost estimates for SRS cleanup showing how the planned work activities and their sequencing can continue to find cost-savings and identify processes to accelerate the 2025 date for cleanup completion.

### **References**

1. Federal Facility Agreement for the Savannah River Site, WSRC-OS-94-42, Administrative Document Number 89-05-FF.
2. Federal Facility Agreement Annual Progress Report for Fiscal Year 2002, WSRC-RP-2002-4202, November 2002.

### **Agency Responses**

[Department of Energy-SR](#)