



## **Recommendation No. 31**

January 28, 1997

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### **Recommendation on the Shutdown of the River Water System at SRS**

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The SRS Citizens Advisory Board recognizes and commends DOE for wanting to shutdown the river water pumping system at SRS to save the costs of operating and maintaining this system which is no longer needed to provide cooling water for the SRS reactors. However, there are some additional factors related to this system which need to be considered. The SRS Citizens Advisory Board recommends that DOE:

1. Place the river water system in a minimum cost standby condition as soon as possible (see items 2, 3 and 6). Keep the system available to provide cooling water for the possible future missions that may require large amounts of cooling water with repairs and restart costs borne by the new missions.
2. Before making a decision to place the system on standby, investigate the legal requirements and the Savannah River water rights withdrawal restrictions that might be required prior to reactivating a river water pump house.
3. Consider as sufficient the National Environmental Policy Act (NEPA) data developed to evaluate the environmental impacts of different alternative actions on L-Lake for the Federal Facility Agreement (FFA) Remedial Investigation/Feasibility Study (RI/FS) process at L-Lake. Consider the potential Remedial Actions section of the Draft Environmental Impact Statement (DEIS) as the basis for those remedial actions in the FFA RI/FS process. Move the FFA RI/FS process forward on an expedited schedule to be completed before the Record of Decision (ROD) on the NEPA process. Should environmental remediation of L-Lake be required, consider the decision on it as part of the RI/FS process. Coordinate both decisions and move expeditiously to minimize unnecessary costs.
4. Include the ecological effects of possible remediation actions in the RI/FS process for L-Lake.

5. Consider only the onsite worker regarding human health risk scenarios in the decision process for L-Lake remedial actions under the FFA. It is not DOE-SR policy nor is it part of the SRS Future Use Plan to allow residents to live onsite SRS. This has been supported by the CAB and input from stakeholders. In addition, the DEIS evaluations indicate a greater risk to offsite residents from Cesium-137 fallout from prior atmospheric testing, than to hypothetical onsite residents who might have a risk from the Cesium-137 in L-Lake outside of the Steel Creek channel and its floodplain.

6. Complete consultations with the Natural Resource Trustees before issuing the Record of Decision on the Shutdown of the River Water System because endangered species (eagles and wood storks) reside in the L-Lake area. Recommendation on the Rocky Flats Plutonium EIS Scope

### **Agency Response Summary**

DOE agrees RWS should be put in minimum cost standby condition. DOE has investigated legal requirements and Savannah River water withdrawal restrictions and has determined these withdrawals are not subject to present allocation or permit constraints. Further review may be required if RWS is ever restarted. All parties want to avoid duplication of work and added costs under NEPA/CERCLA. DOE will evaluate if further data is needed. A revised expanded analysis of ecological risk was conducted.