



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

### **Recommendation No. 58**

May 19, 1998

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## **Accelerating Cleanup: Paths to Closure**

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### **Background**

The purpose of the National and Savannah River Site documents, *Accelerating Cleanup: Paths to Closure*, is to provide an integrated path forward for cleanup of DOE sites in the Environmental Management Program. Discussion drafts were published in June 1997 and released for public comment. The SRS Citizens Advisory Board (CAB) provided comments on the National and Savannah River Site discussion drafts in Recommendation Number 41, July 22, 1997.

The Environmental Management Integration plan <sup>(1)</sup> also provides important input to the cost effective management of DOE's complex wide cleanup program. The SRS CAB has supported this plan with Recommendation 48, November 18, 1997 and implementation of part of the plan concerning shipping high level waste at West Valley to SRS with Recommendation 51, November 18, 1997.

The National and Savannah River Site documents were revised to incorporate comments and reissued in February 1998 <sup>(2 & 3)</sup> as drafts open for public comment until May 1, 1998. The SRS CAB has requested that the comment period be extended until May 22, 1998, so the CAB could submit comments approved at their May 19, 1998 meeting.

The majority, but not all, of the comments in CAB Recommendation 41 were adequately considered in the February drafts. The following comments are provided on both February 1998 drafts but with a particular focus on the SRS draft:

### **Recommendation:**

#### **Comments - General**

The following comments are numbered for ease of reference but they are not in a priority order.

#### **National and SRS Documents**

1. The SRS CAB is disappointed that the documents are neither planning nor budget documents; they should contain management commitments and linkage to the Federal Facility Agreements. The documents are too long and too detailed to be considered a strategy. At what point is DOE prepared to stop crafting paths to closure and start executing a plan? In the event additional studies are needed, then written rationale should be provided to stakeholders. Duplication of efforts should also be eliminated.
2. Costs of facility deactivation are included but there is no consideration of facility Decontamination and Decommission costs. At least some conceptual guidance and rough cost estimates should be given in order to present a complete picture of the total costs to the US taxpayer.

3. The cost of the landlord responsibility beyond 2028 should be included since the Environmental Management program costs to 2070 are considered. The landlord costs are a real and continuing cost to the US taxpayer. In addition, the landlord costs should include nuclear materials storage and infrastructure maintenance.
4. Recognizing that funding is going to be limited, there should be more emphasis on hazard containment/control and less on hazard removal/elimination throughout the DOE complex.
5. Credible contingency costs and plans were still not addressed in the SRS and National documents. The CAB has raised this issue previously, it was in CAB Recommendation 41 and the CAB is unhappy that this issue is not addressed in the latest documents. Contingency costs and plans should be developed for major "show-stoppers" such as significant decreases from the level funding assumption, extended delays in solving the technical problems with In-Tank Precipitation, delays in opening WIPP for Transuranic waste disposal and delays in opening the Yucca Mountain Geologic Repository for high level waste and spent fuel. If contingency costs and plans are not provided, provide an explanation why they are not.
6. Each facility, waste site, etc., should have a description of the end state in the national and SRS documents. The current text describes the life cycle costs and the end date but does not describe the facility, waste site, etc., condition or if the facility will still exist at the end date.
7. Neither the National nor SRS document address the impact of restoration activities on ecological habitats and threatened or endangered species or responsibilities for protection of the sites into the future following closure. These issues and their costs should be considered.

#### SRS Document

8. The SRS CAB is concerned about funding being less than required. In FY 1999 there is a \$116 million shortage in the SRS budget, and the assumption of being able to make up shortfalls in funding in future years is not realistic. This comment was included in Recommendation 41 and is repeated because the SRS CAB considers its resolution vital to the success of the ACP.
9. These documents appear to just consider legacy wastes. The SRS document should be clarified to show that it does include wastes from ongoing missions but not wastes from future possible missions. New missions should come with funding to handle their wastes.
10. The SRS draft contains much redundancy; identical text, figures and tables appear in several different places. In particular, the Executive Summary should be significantly shortened (say 2 to 3 pages) and identify the really significant results of the process and remaining issues.
11. Since extensive work has been done by the agencies on the Federal Facility Agreement, we strongly urge linkage between the Federal Facility Agreement and this document.

#### Comments - Specific

#### SRS Document

12. At the top of the list of Site Objectives and Strategies (page 5, SRS draft), the SRS CAB recommends adding "Protect the public, protect the worker, protect the offsite environment and cost-effectively remediate and protect the onsite environment".
13. To the list of special interest and concerns expressed by stakeholders (SRS Executive Summary, page 5) the CAB recommends adding the following:
  - Cost-effective risk reduction
  - Expediting remediation field work and minimizing studies/reports/plans/etc.

14. It is not clear why the Environmental Management landlord responsibility for SRS should end in 2028 while this program will have surveillance and maintenance responsibilities for release sites until 2038.
15. The SRS document mentioned that 56 technology needs had been identified. A list and short description of each would be a useful addition to the report.

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1. A Contractor Report to the Department of Energy on Environmental Management Baseline Programs and Integration Opportunities (Discussion Draft), Complex-Wide EM Integration Team, May 1997
  2. Accelerating Cleanup: Paths to Closure - Draft, U. S. Department of Energy, Office of Environmental Management, Report DOE/EM-0342, February 1998
  3. Accelerating Cleanup: Paths to Closure, Savannah River Operations Office, U. S. Department of Energy, Savannah River, February 1998

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### **Agency Responses**

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