



Recommendation No. 98

September 28, 1999

Corrective Measures Study/Feasibility Study Generic Comments

Background

A Corrective Measures Study/Feasibility Study (CMS/FS) is a document required by CERCLA to specify the alternatives for remedial action for each operational unit (OU) to be remediated. An extensive review of the CMS/FS for the Old Radioactive Waste Burial Ground (ORWBG) and 22 associated old Solvent Tanks was performed by the ORWBG Public Focus Group of the Citizens Advisory Board Environmental Remediation and Waste Management subcommittee. The review led to Citizens Advisory Board Recommendation Number 86 on May 25, 1999, that made specific recommendations to improve the CMS/FS process for the ORWBG.

In order to determine the constituents of concern (COC) for individual pollutants, measurements of concentrations in the environment are compared to release standards. Typical of most CMS/FS documents is that maximum measured concentrations are used. However, standards are usually based on annual average radiation exposures, and workers and the public are not exposed to the maximum measured concentration for a year, so it is more appropriate to use average measured concentrations for COCs.

The three agencies should help the public to better understand the benefits derived from the funds spent on cleanups. The CAB will receive an annual environmental regulatory briefing that will define the relationship between RCRA and CERCLA. The actions necessary to achieve a remedial alternative are a part of the CMS/FS, but the benefits are often omitted. This is exemplified by omitting the preferred remedial action from CMS/FS until the Statement of Basis/Proposed Plan is written. In contrast, a preferred alternative is often described in National Environmental Policy Act (NEPA) Final Environmental Impact Statements (EIS). Thus, if the benefits from cleanups and the preferred alternative are combined into one report, like EIS documents, scarce funds would be saved. The final decision document would remain as it is now with the Record of Decision (ROD) document.

Recommendation

The Savannah River Site Citizens Advisory Board recommends that the three agencies:

1. Clarify the use of institutional control in evaluating exposures to the public.
2. Utilize average measured concentrations rather than the 95% probability level maximum concentrations when comparing measurements to standards to determine Constituents of Concern.
3. Streamline the CERCLA process (e.g., possibly by combining CMS/FS documents with the Statement of Basis/Proposed Plan documents).
4. Integrate cleanup requirements where possible especially when multiple regulatory criteria deal with the same operational unit so that the picture presented to the public is coherent, reduces cleanup time, and saves scarce cleanup funds (e.g., CERCLA and RCRA requirements).

References

1. Corrective Measures Study/Feasibility Study for the Old Radioactive Waste Burial Ground, 643-E (U), Westinghouse Savannah River Company Report, WSRC-RP-98-4012, Rev. 0, March 1999.
2. CAB Recommendation XX, Federal Facility Agreement Modification, Feasibility Study Scoping and Primary Document Quality, adopted July 27, 1999.

Agency Responses

[Department of Energy-SR](#)