



Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802

JUL 21 2004

Ms. Jean Sulc, Chair
Savannah River Site Citizens Advisory Board
24 Harbor River Circle
St. Helena Island, SC 29920

Dear Ms. Sulc:

SUBJECT: Savannah River Site (SRS) Citizens Advisory Board (CAB) Recommendation 190 – Risk-Based End States (RBES) Vision Document

Thank you for your recommendation regarding the draft *SRS RBES Vision Document*. The Site continues to pursue accelerated risk reduction and completion of the Environmental Management (EM) cleanup mission at SRS. The draft *SRS RBES Vision Document* is a critical tool in this effort, in that it defines appropriately protective and sustainable Site conditions at the end of that mission. The Department of Energy (DOE) developed the draft *SRS RBES Vision Document* using a tailored approach for the data requirements. This approach was adopted to be consistent with the area closure strategy recently agreed upon with our regulators and reviewed with the public through the SRS CAB. DOE is committed to a continuous planning process and is accountable for execution of the EM cleanup mission at SRS using a risk-informed approach.

The SRS CAB recommendation comprises nine parts, each of which I would like to address:

Parts 1, 3, 6, and 8 all deal with the determination of risks at SRS and how those risks can be better shared with the public and stakeholders.

– The revised (“final”) *SRS RBES Vision Document* will include additional information on the human health and environmental risks associated with the Site’s currently planned end states and potential alternative end states for each of the hazard types at SRS, including EM facilities to be decommissioned and plutonium-238 contaminated wastes. Risk balancing (that is the risk reduction achieved by an action, as compared to the risk involved in taking the action, or other trade-offs) will be considered and discussed as well. As we progress with the cleanup of hazards by area at SRS, more information about these hazards will be obtained, and more detailed risk assessments will be developed where appropriate. Progress and issues will be discussed with the SRS CAB through periodic Board and committee meetings. The difference between perceived risks and actual risks will be discussed in the final *SRS RBES Vision Document* and will be a topic of the presentation on risk that DOE will develop for the public.

Part 2 asks that DOE clearly articulate the plan for reaching public acceptance of the RBES vision.

– The *SRS RBES Vision Document*, as an examination of the planned end states and possible alternatives to be achieved by the SRS cleanup program, will be an ongoing process that will involve SRS’s regulators and the public. New cleanup alternatives may arise in the future that will make it possible to realize protective and sustainable end states that have not been proposed or evaluated before.

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The first phase of that process has been public and regulator input to the draft *SRS RBES Vision Document*. That input occurred in meetings with regulators, in the public workshop hosted by the CAB, and during a public comment period that ended in May. DOE's plan to promote public acceptance of the final RBES vision is to continue to work with our regulators and to inform the public as we determine appropriate end states. Within the regulatory framework, end states involve decisions that require negotiation with our regulators and public notification and involvement. We will also continue to inform the public through the SRS CAB and other public forums such as Environmental Justice meetings. In addition, DOE has determined that additional public participation is appropriate before finalizing the document in December of this year. A workshop will be conducted on October 5 – 6, 2004, to discuss the next steps in the risk-based end state process. The workshop will be conducted with assistance from the National Governors Association and details of the workshop will be provided when a location and agenda are determined.

Parts 4 and 5 deal with integration of risk-based end states, future land use, historic preservation, and environmental research.

- DOE is considering additional surety of future land use by pursuing Congressional authorization creating perpetual Federal ownership and responsibility for SRS. This initiative is in the early stages of planning. The final *SRS RBES Vision Document* will include a discussion of the integration of historic preservation, cultural resource management, and the Site's National Environmental Research Park status. Also the SRS RBES vision will be factored into updates to the SRS Comprehensive Plan including the Future Use Plan.

Part 7 deals with DOE's pursuit of area risk methodology and protocols to support the area closure strategy.

- DOE agrees to continue to work collaboratively with our regulators and stakeholders to develop an effective and efficient methodology for assessing risks on an area scale. This initiative advances accelerated cleanup decision-making and remediation at SRS.

Part 9 concerns efforts to increase waste activity loading by revising High Level Waste (HLW) Federal Repository glass durability specifications.

- DOE will continue to collaborate with the Nuclear Regulatory Commission, National Academies, and other associated parties to effect a change to the Federal Repository's specifications for HLW glass durability that would enable SRS to increase waste activity loading at the Defense Waste Processing Facility.

Again, we appreciate your interest in this effort, including your willingness to host a workshop dedicated to discussing the *SRS RBES Vision Document* with the SRS CAB and other stakeholders. This process of public participation adds value in building broad support for cleanup objectives that are protective, sustainable, and consistent with the future use of SRS.

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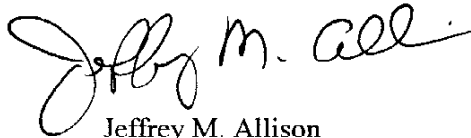
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DOE is in the process of finalizing the *SRS RBES Vision Document* to address public comment. The final document is scheduled to be issued in December 2004 following completion of a national workshop in October that will be conducted with assistance from the National Governors Association.

If you have any questions, please contact me or have your staff contact Mr. Tony Polk at (803) 952-8394.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey M. Allison". The signature is fluid and cursive, with the first name "Jeffrey" being more prominent and the last name "Allison" following in a similar style.

Jeffrey M. Allison
Manager

EB-04-017