



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303

July 19, 2006

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

4WD-FFB

Ms. Karen Patterson, Chairperson
Savannah River Site Citizens Advisory Board
1103 Conger Drive
Aiken, South Carolina 29812

SUBJECT: Savannah River Site Citizens Advisory Board
Recommendation #233
P-Area Operable Unit

Dear Ms. Patterson:

Thank you for your recommendation concerning the P-Area Operable Unit at the Savannah River Site (SRS). The recommendation consists of 6 parts which are shown in bold below, followed by the U.S. Environmental Protection Agency (EPA) responses.

1. **The Three Parties should provide the results from the P-Area Operable Unit Characterization to the SRS CAB as soon as the results are known.**

EPA agrees with the Department of Energy (DOE) response to this recommendation and supports the commitment by DOE to present the characterization results to the CAB in early calendar year 2007.

2. **The Three Parties should continue with formulating a performance assessment modeling strategy for P-Reactor and present the strategy through a series of informational presentations at upcoming Facility Disposition and Site Remediation (FD&SR) committee meetings.**

EPA agrees with the Department of Energy (DOE) response to this recommendation and supports the commitment by DOE to present the performance assessment strategy to the CAB. It should be noted that any strategy must comply with all the requirements of Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

3. **The Three Parties should host a series of public workshops on the P-Reactor End State process. These workshops need to be held as the alternatives are being developed.**

EPA agrees with the Department of Energy (DOE) response to this recommendation and supports the commitment by DOE to hold public workshops on the P-Reactor End State. EPA believes that it is of the utmost importance to involve the public as much as possible in decisions regarding the Reactor End States..

4. **Based upon these workshops, the Three Parties should consider issuing an early decision, Record of Decision (ROD), on the final Reactor End State prior to the P-Area Operable Unit ROD in 2010. Such action will help provide guidance for future hardened facilities end state decisions at SRS.**

EPA will continue meeting with the DOE and the South Carolina Department of Health and Environmental Control (SCDHEC) to determine an appropriate early action for the P-Area Reactor. EPA is very interested in accelerating the cleanup as much as possible in a manner that is protective of human health and the environment and cost effective. EPA is also cognizant that any early action for the P-Area Reactor could be precedent setting at SRS and have implications for all the "hardened facilities".

5. **The Three Parties should utilize a cost/benefit evaluation when determining the P-Reactor End State. This process should incorporate cost-effectiveness and be protective of human health and the environment. The process also needs to consider previous and planned final Reactor End States at other DOE and Nuclear Regulatory Commission (NRC) licensed facilities.**

P-Reactor is a sub-unit of the P-Area Operable Unit. As such, the P-Reactor End State must meet the requirements of CERCLA and will follow the remediation selection process. The remediation selection process will evaluate remedies for 9 criteria which include protectiveness of human health and the environment and cost effectiveness. EPA agrees the remediation selection process for the P-Reactor will consider decisions made at other DOE NPL sites and possibly NRC facilities, as appropriate.

6. **DOE-SR ensure that there is adequate funding for Deactivation and Decommissioning (D&D) and Soil and Groundwater Closure Projects to complete the end state planning process and complete the P-Area Closure as scheduled in the Federal Facility Agreement.**

EPA supports this recommendation and appreciates the interest of the CAB in adequate funding for environmental cleanup at SRS.

If you have any questions or need additional information regarding a response to any part of the recommendation, please contact Robert H. Pope of my staff at (404) 562-8506 or by e-mail at pope.robert@epa.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Ken Lapierre', written over a horizontal line.

Kenneth R. Lapierre, Deputy Director (Acting)
Waste Management Division

cc: Jeff Allison, DOE-SR
Shelley Sherrit, SCDHEC
Dawn Haygood, WSRC