



2600 Bull Street
Columbia, SC 29201-1708

July 14, 2005

Ms. Karen Patterson, Chair
Savannah River Site Citizens Advisory Board
1103 Conger Drive
Aiken, South Carolina 29803

RE: Savannah River Site Citizens Advisory Board
Recommendation 233

Dear Ms. Patterson:

Thank you for the Savannah River Site (SRS) Citizens Advisory Board (CAB) Recommendation 233 in reference to the P Area Operable Unit. Attached please find the South Carolina Department of Health and Environmental Control response to this recommendation.

If you have any questions, please contact Shelly Sherritt at (803) 896-8955.

Sincerely,

Robert W. King, Jr., P.E.
Deputy Commissioner
Environmental Quality Control

cc: Rick Caldwell, Edisto Savannah EQC District
Chuck Gorman, BLWM
Dawn Haygood, SRS

South Carolina Department of Health and Environmental Control Response To
Savannah River Site Citizens Advisory Board
Recommendation 233
P Area Operable Unit

The Citizens Advisory Board (CAB) recommendations are shown in bold, followed by the South Carolina Department of Health and Environmental Control (DHEC) 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.**

DHEC agrees with the Department of Energy (DOE) response to this recommendation (Allison, DOE to Patterson, SRS-CAB letter dated June 28, 2006) and will support efforts 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.**

DHEC agrees with the DOE response to this recommendation (Allison, DOE to Patterson, SRS-CAB letter dated June 28, 2006). It is DHEC's understanding that the DOE plans to present the performance assessment strategy to the CAB at the FD&SR committee meeting on July 18, 2006.

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.**

DHEC agrees with the DOE response to this recommendation (Allison, DOE to Patterson, SRS-CAB letter dated June 28, 2006) and will support efforts by DOE to hold public workshops on the P-Reactor End State process.

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.**

DHEC will work with DOE and Region 4 of the Environmental Protection Agency to determine if and how an early action strategy will be used for the P-Reactor End State. DHEC recognizes that this strategy will have implications for future hardened end state decisions at Savannah River Site.

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.**

The P-Reactor End State will be determined using the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) process and thus, will follow the clean-up selection process, termed Feasibility Study, contained in the National Contingency Plan (NCP). This clean-up selection process considers nine criteria including protection of human health and the environment, technology implementation issues/limitations, and cost. Therefore, cost-effectiveness and protection of human health and the environment will be considered when selecting the end state for P-Reactor. DHEC agrees that the P-Reactor End State process should consider, as appropriate, previous and planned final Reactor End States at other DOE and NRC licensed facilities.

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.**

DHEC supports this recommendation to DOE.