



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

NOV 25 2013

Dr. Donald N. Bridges, Chairperson
Savannah River Site Citizens Advisory Board
P.O. Box A
Aiken, SC 29802

Dear Dr. Bridges:

SUBJECT: Citizens Advisory Board (CAB) Recommendation Number 311 – Review
Tank Cleaning Criteria (Your letter dated, September 25, 2013)

Thank you for your recommendation on “Review Tank Cleaning Criteria.” The Department of Energy (DOE), Savannah River Operations Office accepts your recommendation and provides the following response to the recommendation:

1. The DOE review the past level of clean-up to determine if efficiencies achieved from a different balance of short term and long term risk were applied it would free-up money and resources to accelerate the cleanup of additional tanks reducing short term risks without creating increased long term risks.

The following activities demonstrate DOE’s support of this recommendation:

- A. During Fiscal Year 2014, DOE will develop a revised tank closure strategy based on available technologies and lessons learned from completing bulk waste removal efforts on 7 tanks and 4 tank closures. The strategy will identify areas where efficiencies can be applied.
- B. DOE will share these efficiencies in tank cleaning strategy with South Carolina Department of Health and Environmental Control and U. S. Environmental Protection Agency representatives to support determining when tanks are clean enough to close including appropriately balancing current risks (storage of waste in underground aging tanks) and future risks both in the short term and long term from closed stabilized tanks.
- C. DOE participated in a public meeting with U. S. Nuclear Regulatory Commission Advisory Committee on Reactor Safeguards on November 19, 2013 to discuss DOE’s defense in depth approach to ensuring public safety from the disposal of radioactive waste, including closure of waste tanks. This meeting was associated with the technical basis for revising 10 Code of Federal Regulations Part 61 Low-Level Waste Site-Specific Analysis Rulemaking which includes proposed time frames for compliance with performance objectives. I have attached a copy of the slides used during this meeting for your information.

2. The DOE review evaluated risk scenarios to determine if more realistic risk scenarios would free-up resources for short term risk reduction at SRS or other locations and still protect the public in both the long and short term.

DOE acknowledges the conservatisms associated with risk analysis and agrees more realistic scenarios based on current public lifestyles, could be determined and factored into DOE’s decision making process. Subsequent analysis will include this type of information.

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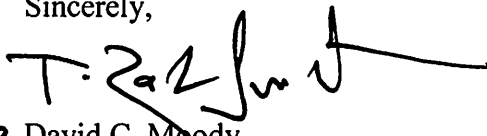
Mr. Bridges

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I want to reaffirm that risk reduction, including waste removal, cleaning and closure of underground storage tanks are of highest priority not just to Savannah River Site but within the Department of Energy Environmental Management program. Furthermore, DOE will continue to keep the CAB informed of the status and progress of this initiative.

As always, DOE welcomes input from the public as we continue to work to close waste tanks. If you have any questions, you can contact me or Terrel J. Spears, of my staff, at (803) 208-6072.

Sincerely,


FOR David C. Moody
Manager

WDPD-14-09

cc:

Kristen Ellis, EM-3.2, DOE-HQ
Catherine Alexander, EM-3.2, DOE-HQ
Sandra Waisley, DDFO, DOE-SR
Terry Spears, DDFO, DOE-SR
Catherine Templeton, SCDHEC
Gwen Keyes, EPA
Albert Frazier, GADNR