



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

MAY 07 1997

Ms. Ann Loadholt, Chair  
SRS Citizens Advisory Board  
P.O. Box 365  
Barnwell, South Carolina 29812

Dear Ms. Loadholt:

SUBJECT: Acceptance of Savannah River Site (SRS) Citizens Advisory Board (CAB)  
Recommendation No. 35

The Department is pleased to accept Recommendation No. 35 and your suggestions for commencing in-field remediation quicker, particularly at higher-risk waste sites.

The three parties to the SRS Federal Facility Agreement place high value on accomplishing field work and are working cooperatively to shorten the time needed to analyze conditions and decide the best course of action. All three parties have worked well together to streamline the paperwork process and advance the SRS cleanup program through the use of more standardized documentation, evaluating similar waste units together, and reducing the time from field start to remediation. The enclosure to my letter explains how we are pursuing these suggestions, and progress will be reported periodically through the Board's Environmental Restoration and Waste Management Subcommittee.

Thank you for offering these ideas and for your continued involvement in the SRS environmental restoration program.

Sincerely,

A handwritten signature in dark ink, appearing to read "G. P. Fiori", is written over the typed name and title.

Mario P. Fiori  
Manager

OB-97-054

Enclosure  
Actions Responsive to SRS  
CAB Recommendation #35

**ACTIONS RESPONSIVE TO SRS CITIZENS ADVISORY BOARD  
RECOMMENDATION NO. 35**

The Department of Energy (DOE) places high value on reducing the risks posed by past nuclear operations, having revised the Savannah River Site (SRS) environmental restoration program to produce in-field results, improve cost-effectiveness, put all resources to work, and more effectively engage regulators and other stakeholders, establishing the foundation for future credibility and program execution. This has led to innovation in several areas, including the time required to analyze conditions and decide the best method for completing DOE's environmental obligations.

One successful element of the SRS environmental restoration program is to use early, interim, and expedited response actions to reduce risks faster. Early action has been taken already in the Burial Ground Complex, R-Reactor Seepage Basin, and D-Area Oil Seepage Basin, and on the risks posed by radioactively-contaminated vegetation located at several waste sites. DOE routinely explores scope-for-scope substitutions with its Federal Facility Agreement (FFA) partners to address higher risks earlier. In fact, SRS plans to start remediation by the end of the year at the sites that make up 80 percent of the risk from all sites that have been evaluated.

DOE understands the value of reducing the time required to reach limited or no further action decisions. The Approved Standardized Corrective Action Design (ASCAD) approach is being applied to groups of inactive waste sites wherever it can be used effectively, for example, and developing screening criteria to identify lowest-risk sites will help the analytical process.

Determining the number of inactive waste sites that require no further action is particularly useful information for DOE customers, regulators, and stakeholders -- an important indicator of the progress being made to actually finish the SRS environmental restoration program. DOE intends to further improve the process used to review waste sites listed in the FFA and determine the sites that require no further action.

DOE is trying to further reduce the time needed to comply with administrative requirements, particularly documentation of the analytical process, and the possibility of generic remedies and expedited Records of Decision/Interim Records of Decision appears particularly promising. Pursuing generic remedies would modify paperwork requirements, allowing for earlier decisions at a reduced cost, so DOE is working with the U.S. Environmental Protection Agency and South Carolina Department of Health and Environmental Control to implement the "plug-in" Record of Decision concept at SRS. This would allow a single Record of Decision to be written for a series of similar waste units, and waste sites that meet criteria set forth in the Record of Decision could be included and remediation started after a single document is approved that justifies the chosen technology. Additionally, a streamlined administrative process could be useful to document consensus interim or final remedy decisions of the three FFA parties, allowing field work to start earlier, so DOE is exploring the use of expedited Records of Decision and Interim Records of Decision with regulatory officials.