



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER
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ATLANTA, GEORGIA 30303-8909

MAR 17 1998

4WD-FFB

Ms. Ann Loadholt, Chairperson
Savannah River Site Citizens Advisory Board
P.O. Box 365
Barnwell, South Carolina 29812

SUBJ: Response to Citizens Advisory Board Recommendation Numbers 46-51

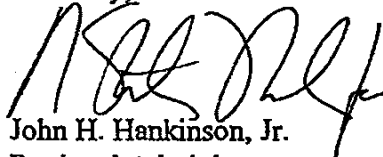
Dear Ms. Loadholt:

The Environmental Protection Agency (EPA) has received the Savannah River Site (SRS) Citizens Advisory Board Recommendations No. 46: Plug-In ROD Approach, No. 47: Environmental Management Integration (EMI) and some SRS Specific Recommendations, No. 48: Complex-Wide Environmental Management Integration (EMI), No. 49: Dispositioning of Excess and Surplus Facilities at SRS, and No. 50: Early Action Strategy.

Enclosed please find individual responses to each of the subject recommendations. We appreciate the Board's input and dialog with the oversight agencies regarding the issues that may impact remediation efforts at SRS. We hope you will continue your active participation to address the challenging issues we face in the cleanup at the SRS.

If you need further assistance, please do not hesitate to contact me or Camilla Bond Warren at (404) 562-8519.

Sincerely,


John H. Hankinson, Jr.
Regional Administrator

Enclosure

Response to CAB Recommendation No.49: Disposing of Excess and Surplus Facilities at SRS

The Department of Energy-Savannah River Site (SRS) has the sole responsibility for designating facilities for the decommissioning and decontamination (D&D) program. Funding for this program falls under a separate budget from the environmental restoration activities. Therefore, D&D activities do not come under the purview of the EPA for coordination and associated planning and oversight responsibilities regarding environmental restoration. An exception would be where D&D activities involve a release of hazardous substances to the environment.

To date, there have been limited D&D activities conducted at SRS. Currently, a program is in place to identify situations that are governed by the various worker and environmental statutes with a focus on surplus inventory and facilities. This will aid in identifying the presence of hazardous substances and to coordinate disposal activities with the environmental restoration and waste management offices. In responding to your recommendation, DOE is in the process of preparing an inventory and ranking of the surplus facilities and equipment. However, only DOE can identify whether certain reactors can be decommissioned which may impact future missions. Thus, some reactors may be in "cold standby" awaiting a determination of future needs at the site.

It is not EPA's role to direct the future mission(s) at SRS. EPA will continue to provide assistance and maintain an oversight role in the decommissioning activities that fall within the scope of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and the Federal Facilities Agreement.

Response to CAB Recommendation No.50: Early Response Strategy

The three parties to the Federal Facilities Agreement have developed an Early Action Strategy in which the decision process for pursuing early actions has been documented and will be considered prior to, and throughout the investigation of sites for clean-up. This strategy provides the three parties to the FFA with a common decision-making framework which should better enable more frequent use of early actions. The Environmental Protection Agency (EPA) appreciates the Citizens Advisory Board's (CAB) input and support of this streamlining strategy. The EPA concurs with the recommendation's request to coordinate with the decision for implementation of early actions with the public and the CAB.

Response to CAB Recommendation No.51: Environmental Management Integration High Level Waste

The recommendation supports the shipment of canisters of vitrified High Level Waste from the

Department of Energy (DOE)-West Valley Site to the DOE-Savannah River Site (SRS) for interim storage, provided certain assurances are made regarding the transport of canisters, interim storage, and final disposition in a High Level Waste Repository. This strategy has been proposed by the DOE in its complex-wide Environmental Management Integration Report (May 1997). The Environmental Protection Agency's (EPA), Region 4 oversight role of DOE-SRS environmental clean-up does not directly involve the Region in such DOE complex-wide-strategies. EPA, Region 4 encourages use of complex-wide strategies which conserve resources, provided a consensus for such strategies is reached among the affected stakeholders.