



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

APR 17 1998

Ms. Ann Loadholt, Chair  
Citizens Advisory Board  
P.O. Box 365  
Barnwell, SC 29812

Dear Ms. Loadholt:

**SUBJECT: Citizens Advisory Board (CAB) Recommendation Number 56—Remediation of F-Area Retention Basin (FRB)**

Thank you for your recommendation regarding remediation of the FRB.

We understand your recommendation for a less extensive, less costly remediation for the FRB. The Department of Energy (DOE), Environmental Protection Agency, and South Carolina Department of Health and Environmental Control believe, however, that the preferred remedial alternative for the FRB soils (institutional controls, grouting and low permeability cover), provides longer term stability of the radioactive waste and improves its resistance to leaching. Also, grouting the contaminated soils adds a measure of protection to address the uncertainty inherent in the mathematical models used to predict contaminant migration. The difference in cost between a low permeability soil cap and the preferred remedy (including stabilization) is also offset somewhat by the more extensive long-term maintenance needed for the cap.

The proposed remediation for the groundwater associated with this unit is "no action." At this time the FRB source unit has not impacted groundwater; therefore, no groundwater cleanup is needed. The preferred remedial alternative for the basin soils is intended to prevent any further migration of contaminants that could affect groundwater. To verify the effectiveness of this alternative, groundwater monitoring downgradient of the grouted mass is also included in this alternative.

We agree with the second point of your recommendation, that quantifiable reduction of baseline risk is an essential consideration in remedy selection. All remedial alternative evaluations analyze the risk remaining after remediation. This is done through the setting of risk-based remediation goal options. However, in addition to risk-based goals, other cleanup objectives are considered. The National Contingency Plan includes a preference for treatment of principal threat wastes. The preferred FRB remedy incorporates this preference as a key element of the prudent long-term management of radioactive waste in-situ.

Further, we agree with the CAB that the Plug-In approach will be a valuable tool for streamlining the path to cleanup and plans to diligently pursue finalization of the Plug-In Record of Decision for the Savannah River Site.

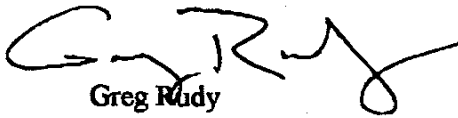
Ms. Loadholt

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If you have any questions, or need additional information, please contact Cynthia Anderson at (803) 725-3966.

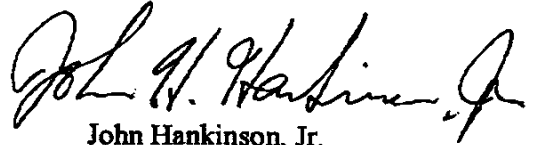
Sincerely,



Greg Rudy  
Acting Manager  
U.S. Department of Energy  
Savannah River  
Operations Office



R. Lewis Shaw  
Deputy Commissioner  
Environmental Quality Control  
S.C. Department of Health  
and Environmental Control



John Hankinson, Jr.  
Regional Administrator  
U.S. Environmental  
Protection Agency  
Region IV

OD-98-045