



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

DEC 20 1995

Dr. Mildred McClain, Co-Chair
Savannah River Citizens Advisory Board
720 Maupas Avenue
Savannah, GA 31401

Mr. Bob Slay, Co-Chair
Savannah River Citizens Advisory Board
P.O. Box 192
Beech Island, SC 29842

Dear Dr. McClain and Mr. Slay:

SUBJECT: Citizens Advisory Board's (CAB's) Eighth Recommendation - Future Uses of Savannah River Site (SRS) (Your letter, 10-03-95)

Thank you for submitting your eighth recommendation to the Department of Energy (DOE) regarding the future uses of SRS. We agree with the substance of your recommendation. It is very similar to our own internal ideas of designating the SRS as a National Environmental Research Park (NERP) and to the many comments received during the SRS Future Use Project.

Your recommendation has been incorporated into the draft SRS Future Use Project Report, which is currently being revised to reflect your comments provided at the November 28, 1995 Board meeting. While we are in substantial agreement with the CAB's proposal, we take the following minor exceptions:

- Under the NERP proposal, Savannah River Operation Office's (SR's) intent is to limit industrial development to those areas currently being used for industrial purposes. This will not necessarily limit any future development of those areas, but will provide maximum flexibility for use of the land.
- As far as recreational opportunities are concerned, we have recently expanded the hunting opportunities in the Crackneck portion of the site. While we will continue to review recreational proposals on a case-by-case basis, we believe it is prudent to take a conservative approach for the foreseeable future, rather than "actively promote" increased recreational activities at the site.
- SR also agrees with the intent of the ninth part of your recommendation, but in accordance with current laws and regulations, we have no mechanism to give first refusal to former property owners. In fact, those regulations specify a procedure for disposing of excess property.

These differences will be discussed in more detail in the report. It is our intent to discuss these with you prior to distributing another version of the report. This report, along with your recommendation, will be used for future planning and decision-making activities for this site.

Again, thank you for your timely and important recommendation.

Sincerely,
Original Signed by
Mario P. Fiori

Mario P. Fiori
Manager

PM&CD:VLG:kr

Comments on DOE Response to CAB Recommendation 8
(Letter to Mildred McClain and Bob Slay from Mario P. Fiori, December 20, 1995)

Note that comments are only provided on the parts of the DOE response where it was deemed necessary.

First minor exception: This exception limits future industrial development to current industrial areas whereas the CAB recommended that about 1/3 of SRS should be considered for industrial development. Limiting industrial development to the current industrial areas would be a nice goal from a National Environmental Research Park (NERP) standpoint but is not realistic for a site whose interest is in new government missions and in privatization to make up for lost jobs. The CAB indicated the land in the industrial area could be used for other purposes until an actual site was needed and even then the particular site would undergo all of the appropriate environmental reviews before the actual site was approved. Formal designation as industrial is also important from a CERCLA clean up standpoint; legislative designation of the SRS as a NERP has no impact on clean up actions. Regulatory agencies would likely push hard for clean up to residential standards. In fact, the SRS Land Use Technical Committee recommends that the whole site be declared as a primary use industrial under CERCLA and RCRA. (See pages 10 and D-2 in *Savannah River Site Future Use Project Report*, January 1996).

In practice, there is an inconsistency in DOE's actions and the December 20, 1995 letter from Dr. Fiori because industrial activities are now being considered outside of the current industrial areas. For instance the proposed Three Rivers Authority landfill site is outside of the currently defined industrial areas but within the CAB industrial zone. This is also true of the proposed New Production Reactor site although both are shown on the map which is part of the Savannah River Operations Office recommendations in the *Savannah River Site Future Use Project Report*, January 1996 (page 15). Only one of the 6 possible Accelerator Production of Tritium (APT) sites is in a current industrial area whereas 3 are in the CAB industrial zone. The International Thermonuclear Experimental Reactor (ITER) proposed site is outside of a current industrial area. Many more examples could be given. This inconsistency in actions versus the December 20, 1995 letter casts doubts on DOE's credibility.

Second minor exception: The expansion of hunting into the Crakerneck portion of the site is a good step toward the expansion of recreational opportunities. Much more can be done in the way of public recreation at SRS, such as bird watching, walking, bike and horseback riding, etc. There are walking trails available now that could be used by the public. This would also go a long ways towards changing public perceptions about SRS. Dr. Fiori's willingness to review recreational proposals is appreciated. In the meantime, CERCLA cleanup goals, outside of industrial areas, should be based on limited recreational use.

Third minor exception: It is true that current laws and regulations specify a procedure for disposing of excess land. However, as a courtesy to former land owners, DOE could initiate efforts, if any SRS land is to be excessed, to make the necessary changes in the laws and regulations to give them first refusal. In fact the *Savannah River Site Future Project Report*, January 1996 promises to seek such legislation (see page I-11, Response 34). Thus, there is an inconsistency between the December letter and the January report.

Comments on EPA and DHEC Response to CAB Recommendation 8
(Letter from John H. Hankinson, Jr. and R. Lewis Shaw to
Robert H. Slay and Ann Loadholt, February 26, 1996)

Note that comments are only provided on the parts of the EPA and DHEC response where it was deemed necessary.

Letter, bottom of first page: While it is true that a recreational scenario could be conceived that might give a similar exposure to a residential use (i.e., camping all year in the same spot and living off of the land) it is extremely unlikely to occur. On SRS, recreational uses would be controlled and exposures developed for that use. Note the Appendix to the *CAB Vision Document* for definitions of different CERCLA land use categories (page B-12 in the *Savannah River Site Future Use Project Report*, January 1996).

Letter, top of page 2: There is a cost associated with doing the exposure calculations for residential use. This is particularly true for complex sites. There will be cases where almost by inspection, it is obvious that the site will not pass a residential scenario exposure calculation and it would be very expensive to clean it up to that standard. The assessment should then just move on to an industrial or recreational scenario. On the other hand, there will be simple sites that can be cleaned up relatively cheaply to residential standards. There may be such sites within the defined industrial zone that could be cleaned up to residential or recreational standards. That clean up should just be done with a minimum of expensive paper work. The moneys saved from not completing risk assessments for residential uses of complex sites could more effectively be used to clean up other sites. The CAB and others have repeatedly requested that moneys be spent on actual cleanup, not on more regulatory paperwork.

Letter, page 2, 2nd paragraph: There is complete agreement that human and ecological health need to be protected. However the CAB recognized that the actual clean up to some standard for a human exposure scenario can be more destructive to the environment than doing nothing. A classic case is the removal of the Cs-137 sediment in Par Pond instead of just refilling the pond. At Par Pond, the decision to refill the pond protected the environment.

Comment to Part 1: The CAB recommendation to maintain the whole SRS under Federal ownership was to preserve the option of using this site to meet some unknown