



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

SEP 24 1999

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

Dear Ms. Loadholt:

SUBJECT: Citizens' Advisory Board (CAB) Recommendation Number 93 - Federal Facility Agreement (FFA) Modification; Feasibility Study Scoping and Primary Document Quality

The Department of Energy (DOE), Environmental Protection Agency Region 4 (EPA), and South Carolina Department of Health and Environmental Control (SCDHEC) thank you for your recommendation concerning the suspension of some Environmental Restoration (ER) project milestones.

We are continually trying to improve the efficiency and cost-effectiveness of our three-party process for doing ER. This pause of less than five months on a limited number of ER projects (11 of 64) will allow us to identify and fix some recurring problems that have slowed down our cleanup decision-making process several times in the past, and avoid similar delays on future projects.

The suspension of milestones while we make substantive improvements to our work process is an innovative approach that shows trust and a mutual commitment to doing cleanup work better. It recognizes that continuing to submit documents (and meet existing milestones) without identifying and incorporating needed changes would be counter-productive. We cannot guarantee that suspension or extension of milestones will not be considered if future circumstances bring issues that need programmatic review and resolution. We will, however, communicate with the CAB to ensure that you are aware of any issues and our progress toward resolving them.

The suspension was not "caused"; it was chosen by the three parties as a way to effectively manage the cleanup process. EPA and SCDHEC proposed the suspension to address recurring delays on ER projects at a similar point in their execution—the conclusion of the unit characterization and transition to the evaluation of remedial alternatives. During the period of suspended milestones, a three-party team is working on specific ways to improve the remedial investigation report to allow more focused planning ("scoping") of the feasibility study of various cleanup options.

When the suspension was proposed, EPA and SCDHEC identified candidate units. In discussing the proposal, the three parties decided that two of the initially proposed units did not need the break, but three other units would benefit from it. The list of units in the FFA modification, while different from the original list, therefore represents a consensus list, rather than a DOE counter-proposal.

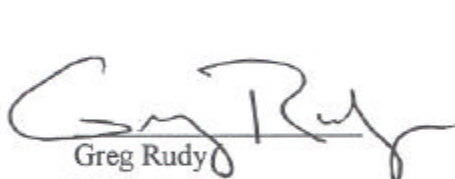
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By November 15, 1999 the three-party team will have agreed on the specific improvements to the ER work process and its documents, and all affected projects will have restarted suspended work, with new implementation schedules and enforceable milestones based on the time needed to implement the improvements. In any case, default milestones have already been agreed upon and will become effective should they be needed.


As you request, we will report by September 1, 2000 our pre-and post-suspension regulatory document approvals going past Revision 1. We propose to update this comparison data annually in the *FFA Annual Progress Report*.

Thank you again for your involvement in this and other issues related to environmental cleanup progress at the Savannah River Site. Please contact Camilla Warren, Chief, Federal Facilities Branch (EPA) at 404-562-8516; Keith Lindler, Director, Site Assessment and Remediation (SCDHEC) at 803-896-4052; or Cynthia Anderson, Director, Environmental Restoration Division (DOE-SR) at 803-725-3966 if you have any questions.

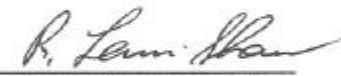
Sincerely,



Greg Rudy
Manager
DOE-SR



John Hankinson
Administrator
US EPA Region 4



R. Lewis Shaw, P.E.
Deputy Commissioner
SCDHEC

OD-99-051

cc: Craig Hooks, EPA HQ, OECA
Tim Fields, EPA HQ, OSWER
James Woolford, EPA HQ, FFRRO