



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

FEB 03 2000

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

Dear Ms. Loadholt:

**SUBJECT:** Citizens Advisory Board (CAB) Recommendation Number 98 – Corrective Measures Study/Feasibility Study (CMS/FS) Generic Comments

Thank you for submitting the subject recommendation regarding the CMS/FS methodology at the Savannah River Site (SRS).

The Department of Energy (DOE), the Environmental Protection Agency (EPA), and the South Carolina Department of Health and Environmental Control (SCDHEC) have evaluated your recommendation as follows:

**Recommendations One and Two:** The three parties will provide the Environmental Remediation Committee a briefing on its uses of institutional control in evaluating exposure to the public. Additionally, The Land Use Control Assurance Plan for SRS ensures that DOE's institutional control can maintain industrial use and prevent inappropriate exposures. We will also provide a briefing on the regulatory guidance and rationale that call for using average measured concentrations and 95% probability level maximum concentrations when comparing environmental measurements to standards for determining Constituents of Concern.

**Recommendation Three:** Combining the CMS/FS and Statement of Basis/Proposed Plan documents is possible, and has been done in the past at SRS. The CMS/FS document can also be eliminated completely if a detailed evaluation of cleanup alternatives is not needed for decision making. The three parties are continually looking to streamline and improve the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process, and in the future we will evaluate combining or eliminating other appropriate CERCLA documents.

**Recommendation Four:** The Federal Facility Agreement (FFA) for the SRS integrates and satisfies the requirements of the Resource Conservation and Recovery Act (RCRA) and CERCLA for the waste units listed in Appendix C of the FFA. Where multiple regulatory criteria (e.g., CERCLA and RCRA) deal with the same area, as at the Old Radioactive Waste Burial Ground, we develop cleanup goals under those programs (for their respective contaminated media) that are compatible and mutually supportive to achieve the best and most cost-effective cleanup for the area. We will continue to present the goals of these cleanups to the public in a way that can be understood and supported.

Ms. Loadholt

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If you have any questions, please call Cynthia Anderson, Director, Environmental Restoration Division (DOE-SR) at 803-725-3966, Keith Lindler, Director, Site Assessment and Remediation (SCDHEC) at 803-896-4052, or Camilla Warren, Section Chief, Federal Facilities Branch (EPA) at 404-562-8516.

Sincerely,



Greg Rudy  
Manager  
US Department of Energy  
Savannah River  
Operations Office



R. Lewis Shaw, P.E.  
Deputy Commissioner  
Environmental Quality Control  
S.C. Department of  
Health and Environmental  
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John H. Hankinson, Jr.  
Regional Administrator  
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OD-00-024