**Shelia Mcfalls**

**From:** Beatty, K. Leigh <BEATTYKL@dhec.sc.gov>
**Sent:** Monday, April 12, 2021 3:41 PM
**To:** Shelia Mcfalls
**Cc:** HENNESSEY, BRIAN; Chris Bergren; Robert Shirley; Thelesia Oliver; Ross Fanning; Manuel Terronez; J Ross; Dena Brett; Juana Maddox; James Kupar; Joseph Burch; John Blankenship; William Griffin; McRae, Mac; 'Jon Richards (richards.jon@epa.gov)'; pope.robert (epa.gov); Fulmer, Susan; Cathcahe (dhec.sc.gov); O'Quinn, Gregory; Cameron, Bethany; Fuss, Travis R.
**Subject:** Re: Draft Responses to SCDHEC's Comments on DPFRs for Buildings 681-7G, PAR Pond Pump House Equipment Building and 735-7G, PAR Pond Environmental Support Facility and FFA Path Forward for Buildings 651-6G, 681-7G, and 735-7G and Ancillary Facility Remn...
**Attachments:** V-PCOR-G-00022_CR.pdf; V-PCOR-G-00023_CR.pdf

Shelia,

The Department approves the attached draft response to SCDHEC's comment on the DPFR for the PAR Pond Pump House Equipment Building, Building 681-7G and provides the following comments on the attached draft response to SCDHEC's comments on the DPFR for the PAR Pond Environmental Support Facility, Building 735-7G.

Table 2, Page 2

1) Please include explanations for the asterisks.

2) To further support the DOE's proposal to transfer the listing for this site from FFA Appendix K.1 to Appendix K.2, please include the statement below that is given beneath Table 1 on Page 2 of the draft response to SCDHEC's comment on the DPFR for the PAR Pond Pump House Equipment Building, Building 681-7G.

> *Radiological surveys and water analysis did not detect radiological contamination; however, SRS assumed piping and equipment that contacted PAR Pond water was radiologically contaminated and conservatively managed it as LLW.*

Thanks,

Leigh Beatty
Environmental Health Manager
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**From:** Shelia.Mcfalls@srs.gov <Shelia.Mcfalls@srs.gov>
**Sent:** Monday, March 29, 2021 11:12 AM
**To:** 'Jon Richards (richards.jon@epa.gov)' <richards.jon@epa.gov>; Cathcart, Heather E. <cathcahe@dhec.sc.gov>
**Cc:** pope.robert@epa.gov <pope.robert@epa.gov>; Fulmer, Susan <fulmersb@dhec.sc.gov>; brian.hennessey@srs.gov <brian.hennessey@srs.gov>; chris.bergren@srs.gov <chris.bergren@srs.gov>; Robert.Shirley@srs.gov <Robert.Shirley@srs.gov>; thelesia.oliver@srs.gov <thelesia.oliver@srs.gov>; ross.fanning@srs.gov <ross.fanning@srs.gov>; manuel.terronez@srs.gov <manuel.terronez@srs.gov>; j.ross@srs.gov <j.ross@srs.gov>; dena.brett@srs.gov <dena.brett@srs.gov>; Juana.Maddox@srs.gov <Juana.Maddox@srs.gov>; james.kupar@srs.gov <james.kupar@srs.gov>; joseph.burch@srs.gov <joseph.burch@srs.gov>; john.blankenship@srs.gov <john.blankenship@srs.gov>; William.Griffin@srs.gov <William.Griffin@srs.gov>; Fuss, Travis R. <FUSSTR@dhec.sc.gov>; O'Quinn, Gregory <OQUINNGN@dhec.sc.gov>; Cameron, Bethany <cameroba@dhec.sc.gov>; Beatty, K. Leigh <BEATTYKL@dhec.sc.gov>; McRae, Mac <Mac.McRae@TechLawInc.com>
**Subject:** Draft Responses to SCDHEC's Comments on DPFRs for Buildings 681-7G, PAR Pond Pump House Equipment Building and 735-7G, PAR Pond Environmental Support Facility and FFA Path Forward for Buildings 651-6G, 681-7G, and 735-7G and Ancillary Facility Remnants

Jon and Heather,

The U. S. Department of Energy (DOE) submitted the Revision 0 Decommissioning Project Final Reports (DPFRs) for Building 651-6G, PAR Pond Primary Transformer Substation (V-PCOR-G-00026, Revision 0, September 12, 2011), Building 681-7G, PAR Pond Pump House Equipment Building (V-PCOR-G-00023, Revision 0, September 12, 2011), and Building 735-7G, PAR Pond Environmental Support Facility (V-PCOR-G-00022, Revision 0, September 12, 2011) on September 21, 2011. Buildings 651-6G, 681-7G, and 735-7G and any associated ancillary facilities were decommissioned using the Integrated Sampling Model (ISM). Per the respective DPFRs, the facilities and associated ancillary facilities did not require any further evaluation or response action and were proposed for inclusion in Federal Facility Agreement (FFA) Appendix K.2, D&D Facilities (or remnants) that Require No Further Evaluation.

In their letter dated November 10, 2011, the South Carolina Department of Health and Environmental Control (SCDHEC) stated that they did not disagree with the intent of, or rationale for, the proposed action of transferring Building 651-6G to FFA Appendix K.2; however, neither the Facility Decommissioning Evaluation (FDE) nor the DPFR protocol provided a mechanism for ISM facility remnants to be transferred to Appendix K.2. SCDHEC requested that the protocol be revised to allow the transfer of ISM facility remnants to Appendix K.2. In their letter dated December 21, 2011, the U. S. Environmental Protection Agency (EPA) stated that Building 651-6G should be transferred to FFA Appendix C.4 because it was decommissioned as an ISM.

For Buildings 681-7G and 735-7G, SCDHEC provided comments on the respective DPFRs in letters dated November 10, 2011. EPA conditionally concurred on the DPFRs for Buildings 681-7G and 735-7G in their letters dated December 21, 2011, pending resolution of the comments generated by SCDHEC. The Savannah River Site (SRS) has not previously provided responses to the SCDHEC's comments pending the revision and approval of the FDE/DPFR protocol to allow ISM facility remnants to be transferred to FFA Appendix K.2.

Buildings 651-6G, 681-7G, and 735-7G and ancillary facility remnants have remained on FFA Appendix K.1 pending finalization of the FDE/DPFR protocol. DOE, SCDHEC, and EPA recently approved the *Core Team Protocol for Review and Concurrence on Facility Decommissioning Evaluations and Decommissioning Project Final Reports* (SRNS-RP-2021-00120, Revision 0 (corrected), February 2021). The protocol allows for the transfer of ISM facility remnants to FFA Appendix K.2.

Buildings 651-6G, 681-7G, and 735-7G and associated ancillary facility remnants are appropriate candidates for transfer to FFA Appendix K.2. In accordance with the approved protocol, SRS has prepared the attached draft responses to the SCDHEC's comments on the DPFRs for Buildings 681-7G and 735-7G for your review.

Please review the information contained in this email and reply via email by COB, April 16, 2021, if the proposed path forward for Buildings 651-6G, 681-7G, and 735-7G and associated ancillary facility remnants and the draft responses are acceptable or if a comment resolution conference call will be required. Once we receive your input on the proposed path forward and the draft responses, we will submit the information via DOE letter for approval.

Please contact me if you have any questions, comments, or concerns.

Thanks

**Shelia L. McFalls** | **Savannah River Nuclear Solutions, LLC** | Environmental Compliance & Area Completion Projects | shelia.mcfalls@srs.gov | 1.803.952.6819 office | 1.803.645.8119 cell | 1.803.725.7243, #19367 pager |1.803.952.6403 fax |Savannah River Site | Building 730-4B, 3134 | Aiken, SC 29808

Draft Savannah River Site Responses to the
South Carolina Department of Health and Environmental Control Comments on
Decommissioning Project Final Report (DPFR): PAR Pond Environmental Support Facility,
Building 735-7G, V-PCOR-G-00022, Revision 0, September 12, 2011 (Cover letter dated
September 21, 2011)

Comments Received: November 10, 2011



1. Table 2 in Section 5.02, Waste Disposal, indicates Low Level Waste and Mixed Waste were generated during the decommissioning of this facility. Please explain how this does not contradict the conclusion that the buildings contained no radioactive contamination (Section 6.02).

   **Response Comment #1: Agree. The Savannah River Site (SRS) generated some low-level radioactive waste (LLW) during the decommissioning of Building 735-7G, which consisted of piping that came into contact with water from PAR Pond. Because the interior of the piping and equipment were not readily accessible for radiological survey, it was presumed that potential radioactive particulates may have plated out on the internal wall surfaces. SRS assumed the piping and equipment were radiologically contaminated and conservatively managed it as LLW. Therefore, the piping system was disposed of as LLW and/or mixed waste (e.g., brass valves).**

   **During decommissioning of the PAR Pond complex, exterior surveys of piping and equipment that came into contact with PAR Pond water showed no evidence of radiological contamination. In addition, Building 735-7G and its ancillary structure, Building 735-8G, were surveyed prior to demolition and found to be free of radiological contamination. Copies of the Radiological Surveys for Buildings 735-7G/-8G are included in Appendix B of the Building 735-7G DPFR (V-PCOR-G-00022, Revision 0, 9/12/2011). Therefore, the Building 731-7G DPFR reported that the building and its ancillary structure, Building 735-8G, contained no radiological contamination (see Sections 1.0 and 6.02 of the DPFR).**

   **During the reporting of the PAR Pond Complex decommissioning, SRS combined the volume of material managed as LLW and/or mixed waste from Building 735-7G (82 cu. ft.) with the volume of LLW material from Building 681-7G (525 cu. ft.) and reported the combined total LLW waste generation from the two buildings (607 cu. ft.) in the Building 735-7G DPFR (V-PCOR-G-00022). Provided below is the revised Table 2 - Summary of Waste Generation, Building 735-7G and its Ancillaries, which correctly shows the LLW and/or mixed waste volume of 82 cu. ft. for Building 735-7G from disposal of miscellaneous piping and equipment.**

   **Although Building 735-7G and its ancillary structure, Building 735-8G, were decommissioned using the Integrated Sampling Model because some components (piping, drains) came in contact with PAR Pond water, there is no potential for residual radiological contamination after decommissioning. In**

**accordance with the recently approved *Core Team Protocol for Review and Concurrence on Facility Decommissioning Evaluations and Decommissioning Project Final Reports* (SRNS-RP-2021-00120, Revision 0 (corrected), February 2021), the facilities are appropriate candidates for transfer to Appendix K.2., D&D Facilities (or remnants) that Require No Further Action. No change to the Building 735-7G DPFR is proposed.**

Table 2 – Summary of Waste Generation, Building 735-7G and its Ancillaries

| Waste Classification | Waste Source | Disposed to | Total Volume |
|---|---|---|---|
| **735-7G, Environmental Support Facility** | | | |
| Sanitary | Structural rubble, JCW and PPE | SRS C&D Landfill | 9,112 cu. ft. |
| ACM | Floors tiles, mastic, JCW, PPE | SRS C&D Landfill | 540 cu. ft. |
| LLW | De**commissioning**~~activation~~ debris (piping, metal supports, etc.) | E-Area Slit Trenches | **~~607~~ 82 cu. ft.** |
| Mixed | Brass (valves, couplings, gauges, etc.) | SRS MWSF | 1 cu. ft. |
| Universal | Light bulbs | SRS Collection Point (N-Area) for light bulbs* | 30 cu. ft. |
| Universal | Batteries | SRS Collection Point (722-A) for batteries* | <1 cu. ft. |
| **SRSPB0084 and SRSPB01168, Portable Buildings** | | | |
| Sanitary | Structure rubble (e.g., metal frame/ siding and wood) | SRS C&D Landfill | 1,215 cu. ft. |
| **662-2G, Limnology Lab Boathouse and Boat Dock** | | | |
| LLW | Miscellaneous wood, foam debris, JCW, PPE | SRS E-Area Slit Trenches | 3,037 cu. ft. |
| Sanitary | Miscellaneous wood debris, JCW | Three Rivers Landfill | 607 cu. ft. |
| **735-8G, Green House** | | | |
| Sanitary | Structural rubble, JCW and PPE | SRS C&D Landfill | 2,430 cu. ft. |
| **760-8G, Park Shelter** | | | |
| Sanitary | Miscellaneous wood, roofing debris, JCW | Three Rivers Landfill | 1,215 cu. ft. |

ACM – Asbestos-containing material
C&D Landfill – SRS Burma Road Construction, Demolition and Land Clearing Debris Landfill
JCW – Job Control Waste
LLW – Low Level (Radioactive) Waste
MWSF – Mixed Waste Storage Facility
PPE – Personal Protective Equipment

2. Please explain how the internal walls of the process piping were radiologically assessed.

   **Response to Comment #2: Agree. Please see the response to Comment #1. The internal walls of the process piping were not readily accessible for radiological survey. SRS conservatively assumed the piping and equipment were radiologically contaminated from contact with PAR Pond water and managed it as LLW and/or mixed waste (e.g., brass valves).**

Draft Savannah River Site Response to the
South Carolina Department of Health and Environmental Control Comment on
Decommissioning Project Final Report (DPFR): PAR Pond Pump House Equipment Building,
Building 681-7G, V-PCOR-G-00023, Revision 0, September 12, 2011 (Cover letter dated
September 21, 2011)

Comments Received: November 10, 2011



1. Please explain how the internal walls of the process piping and associated pumps and motors were radiologically assessed. It does not appear that they were radiologically surveyed (ref.: Appendix B) or assumed contaminated and disposed of as radioactive waste since Table 1 is devoid of a radioactive waste stream.

   **Response Comment #1: Agree. The Savannah River Site (SRS) generated some low-level radioactive waste (LLW) during the decommissioning of Building 681-7G, which consisted of piping and equipment that came into contact with water from PAR Pond. Because the interior of this piping and equipment were not readily accessible for radiological survey, SRS assumed the piping and equipment were radiologically contaminated and conservatively managed it as LLW. Exterior surveys of the piping and equipment along with analysis of the sump water showed no evidence of radiological contamination in Building 681-7G. In addition, Building 681-7G was surveyed prior to demolition and found to be free of radiological contamination. A copy of the Radiological Survey for Building 681-7G is contained in Appendix B of the DPFR (V-PCOR-G-00023, Revision 0, 9/12/2011). Therefore, the Building 681-7G DPFR reported that the building contained no radiological contamination (see Sections 1.0 and 6.02 of the DPFR).**

   **During the reporting of the PAR Pond Complex decommissioning, SRS combined the volume of material managed as LLW from Buildings 681-7G (525 cu. ft.) with the volume of LLW material from Building 735-7G (82 cu. ft.) and reported the combined total LLW waste generation from the two buildings (607 cu. ft.) in the Building 735-7G DPFR (V-PCOR-G-00022, Revision 0, 9/12/2011). No LLW volumes were reported in the Building 681-7G DPFR (V-PCOR-G-00023).**

   **Provided below is the revised Table 1 – Summary of Waste Generation, Building 681-7G, which correctly shows the LLW volume of 525 cu. ft. for Building 681-7G from disposal of miscellaneous piping and equipment.**

   **Although Building 681-7G was decommissioned using the Integrated Sampling Model due to some components' (piping, drains) contact with potentially contaminated PAR Pond water, there is no potential for residual radiological contamination after decommissioning. In accordance with the recently approved *Core Team Protocol for Review and Concurrence on Facility Decommissioning Evaluations and Decommissioning Project Final Reports* (SRNS-RP-2021-00120, Revision 0 (corrected), February 2021), the facility is an appropriate candidate for transfer to Appendix K.2., D&D Facilities (or**

**remnants) that Require No Further Action. No change to the Building 681-7G DPFR is proposed.**

Table 1 – Summary of Waste Generation, Building 681-7G

| Waste Classification | Waste Source | Disposed to | Total Volume |
|---|---|---|---|
| ACM | Non-friable asbestos containing material (mastic, tile, glazing, cementitious panels, structural rubble, JCW and PPE) | SRS C&D Landfill | 8,100 cu. ft. |
| Universal | Light bulbs | SRS Collection Point (N-Area) for light bulbs* | <5 cu. ft. |
| Wastewater | Water from sumps | SRS Central Sanitary Wastewater Treatment Facility | 6,000 gallons |
| Wastewater | Water removed from excess motors | SRS Building 716-A Oil/Water Separator | 110 gallons |
| LLW** | **Miscellaneous piping & equipment that came in contact with PAR Pond water** | **E Area Slit Trenches** | **525 cu. ft.** |
| Sanitary | Miscellaneous metal debris: gate valves, couplings, fasteners, etc. | Three Rivers Landfill | 1,822 cu. ft. |
| Sanitary | Vertical pumps | SRS C&D Landfill | 4,546 cu. ft. |
| Sanitary | Motors for vertical pumps | Three Rivers Landfill | 7,798 cu. ft. |

ACM – Asbestos-containing material
C&D Landfill – SRS Burma Road Construction, Demolition and Land Clearing Debris Landfill
JCW - Job Control Waste
**LLW – Low Level (Radioactive) Waste**
PPE - Personal Protective Equipment

*Due to small volumes generated, these wastes were consolidated with similar decommissioning wastes and are being managed in accordance with State and Federal regulations until shipment to off site treatment and disposal and/or recycle, as appropriate.
**** Radiological surveys and water analysis did not detect radiological contamination; however, SRS assumed piping and equipment that contacted PAR Pond water was radiologically contaminated and conservatively managed it as LLW.**