

## Shelia Mcfalls

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**From:** Cathcart, Heather E. <cathcahe@dhec.sc.gov>  
**Sent:** Tuesday, December 22, 2020 3:24 PM  
**To:** Shelia Mcfalls; 'Jon Richards (richards.jon@epa.gov)'  
**Cc:** pope.robert (epa.gov); Diedre Lloyd (lloyd.diedre@epa.gov); Tufts, Jennifer; Craig VanTrees; Fulmer, Susan; Fuss, Travis R.; O'Quinn, Gregory; Beatty, K. Leigh; Cameron, Bethany; HENNESSEY, BRIAN; Chris Bergren; Robert Shirley; Thelesia Oliver; Jeffcj Ward; Amy Meyer; Ross Fanning; J Ross; Manuel Terronez; John Blankenship; Dena Brett; Douglas Martinson; Joseph Burch; Kelsey Holcomb; Taylorwf (dhec.sc.gov); Beatty, K. Leigh  
**Subject:** Re: Draft SRS Resp to SCDHEC's Comments on D&D Core Team Protocol for Review & Concurrence on FDEs & DPFrs (ERD-EN-2016-0029, Rev 0a Draft, Apr 2017) & D&D Core Team Protocol for Review & Concurrence on FDEs & DPFrs (ERD-EN-2016-0029, Rev 0a Draft, Nov...

Shelia,

SCDHEC has reviewed the draft comments and revised protocols and has the following comments.

**DRAFT SRS Responses to South Carolina Department of Health and Environmental Control Comments on: Deactivation and Decommissioning (D&D) Core Team Protocol for Review and Concurrence on Facility Decommissioning Evaluations and Decommissioning Project Final Reports (ERD-EN-2016-0029, Revision 0 Draft, April 2017) received May 2, 2017**

### Specific Comments

Response to General Comment #2, Item C, Page 1 of 12. Please provide the mechanism by which the structures/facilities that were demolished between FY94 through FY02 can be tracked.

Response to General Comment #2, Item D. 1, Page 1 of 12. Please explain why all structures/facilities with capital values less than \$250,000 were excluded from FFA Appendix K.1, D&D Facilities to be Decommissioned. The monetary value of the structures/facilities is not necessarily indicative of any potential risk to human health or the environment.

Response to General Comment #2, Items D.1 & D.2, Page 2 of 12. What structures qualify as 000 Series and 700 Series? Are there any 800 Series structures, and if so, what type structures are in that series?

**DEACTIVATION AND DECOMMISSIONING (D&D) CORE TEAM PROTOCOL FOR REVIEW AND CONCURRENCE ON FACILITY DECOMMISSIONING EVALUATIONS AND DECOMMISSIONING PROJECT FINAL REPORTS, ERD-EN-2016-0029, Revision 0a Draft, November 2020**

### General Comment

SCDHEC would like to decompress the FDE review period by extending it from 30 days to 45 days. Using input from the D&D Core Team, applicable time frames within the FDE review period should be adjusted accordingly.

### Specific Comment

Section 3.0, Facility Decommissioning Evaluations, Second Complete Paragraph, Page 3 of 8. Please revise the paragraph to state, "within thirty (30) days of receipt".

### Editorial Comment

Section 1.0, Introduction, Third Paragraph, Page 1 of 8. In the second line, insert the word "have" between "activities" and "been".

While a meeting is not required to address our comments, a meeting is requested to discuss and educate the Core Team and associated personnel of the new protocols. This meeting should be held once the protocols have been finalized.

Please contact me if you have any questions or concerns.

Thanks,  
Heather

**Heather H. Cathcart**

Federal Remediation Coordinator

Federal Remediation Section, Division of Site Assessment, Remediation & Revitalization

**S.C. Dept. of Health & Environmental Control**

Office: (803) 898-0916

Connect: [www.scdhec.gov](http://www.scdhec.gov) [Facebook](#) [Twitter](#)



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**From:** Shelia.Mcfalls@srs.gov <Shelia.Mcfalls@srs.gov>

**Sent:** Tuesday, December 1, 2020 12:17 PM

**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>; Diedre Lloyd (lloyd.diedre@epa.gov) <lloyd.diedre@epa.gov>; Tufts, Jennifer <Tufts.Jennifer@epa.gov>; Craig VanTrees <vantrees.craig@epa.gov>; Fulmer, Susan <fulmersb@dhec.sc.gov>; Fuss, Travis R. <FUSSTR@dhec.sc.gov>; O'Quinn, Gregory <OQUINNGN@dhec.sc.gov>; Beatty, K. Leigh <BEATTYKL@dhec.sc.gov>; Cameron, Bethany <cameroba@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>; jeffcj.ward@srs.gov <jeffcj.ward@srs.gov>; Amy.meyer@srs.gov <Amy.meyer@srs.gov>; ross.fanning@srs.gov <ross.fanning@srs.gov>; j.ross@srs.gov <j.ross@srs.gov>; manuel.terronez@srs.gov <manuel.terronez@srs.gov>; john.blankenship@srs.gov <john.blankenship@srs.gov>; dena.brett@srs.gov <dena.brett@srs.gov>; douglas.martinson@srs.gov <douglas.martinson@srs.gov>; joseph.burch@srs.gov <joseph.burch@srs.gov>; Kelsey.Holcomb@srs.gov <Kelsey.Holcomb@srs.gov>

**Subject:** Draft SRS Resp to SCDHEC's Comments on D&D Core Team Protocol for Review & Concurrence on FDEs & DPFRs (ERD-EN-2016-0029, Rev 0a Draft, Apr 2017) & D&D Core Team Protocol for Review & Concurrence on FDEs & DPFRs (ERD-EN-2016-0029, Rev 0a Draft, Nov 2020)

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Jon and Heather,

Attached for your review are the Draft SRS Responses to SCDHEC Comments on the *Deactivation and Decommissioning (D&D) Core Team Protocol for Review and Concurrence on Facility Decommissioning Evaluations and Decommissioning Project Final Reports (ERD-EN-2016-0029, Revision 0 DRAFT, April 2017)*. We have also attached a November 2020 Revision 0a DRAFT protocol that incorporates the comment responses.

The SRS D&D program has evolved since the implementation of the program in the mid-2000s and initial development of the draft D&D protocol. For this reason, SRS has incorporated program updates and improvements in the attached responses to SCDHEC comments on the April 2017 Revision 0 Draft protocol. A program chronology of the activities related to the D&D protocol development is provided below.

1. The initial D&D protocol stated that facilities decommissioned using the Integrated Sampling Model (ISM) could only be moved to FFA Appendix C.4. In November 17, 2011, SCDHEC requested that the draft D&D protocol be revised to also allow facilities decommissioned using the ISM to be moved to FFA Appendix K.2. (Reference: SCDHEC Comments on the Decommissioning Project Final Report (DPFR): PAR Pond Primary Transformer Substations, Building 651-6G, V-PCOR-G-00026, Revision 0, September 12, 2011).
2. On May 2, 2017, SRS submitted the *Deactivation and Decommissioning (D&D) Core Team Protocol for Review and Concurrence on Facility Decommissioning Evaluations and Decommissioning Project Final Reports (ERD-EN-2016-0029, Revision 0 DRAFT, April 2017)* for review and comment.
3. SRS received comments on the April 2017 Revision 0 DRAFT protocol from SCDHEC on June 2, 2017. During the May 14, 2020 Federal Facility Agreement Project Managers' Quarterly Conference Call, USEPA stated that they had no comments on the DRAFT protocol.
4. SRS received a related comment from SCDHEC on the Federal Facility Agreement Revision 0 Appendix K D&D Facilities for Fiscal Year (FY) 2020 (Print Date: 09/19/2019) on January 27, 2020. SRS submitted the Federal Facility Agreement Revision 1 Appendix K D&D Facilities for Fiscal Year (FY) 2020 (Print Date: 03/19/2020) and Savannah River Site's Responses to the Regulatory Comments on the Revision 0 Appendices C, G and K for FY2020 (Print Date: 09/19/2019) on March 26, 2020. The SCDHEC comment and SRS response related to Appendix K – D&D Facilities are as follows:

“SCDHEC Comment 1: In anticipation of the increase of D&D activities in the future, SCDHEC requests that the protocols, submitted electronically by DOE on May 2, 2017 and comments submitted electronically on June 2, 2017, be finalized. Also, SCDHEC requests that a meeting to discuss the protocols and upcoming activities be scheduled in FY2020 or the first quarter of FY2021.

Response to SCDHEC Comment 1: Agree. The Savannah River Site will schedule a meeting in FY2020 or the first quarter of FY2021 to discuss the protocols and upcoming D&D activities. The draft responses to SCDHEC's comments and a redline revision of the protocol will be submitted prior to the meeting.”

The attached Draft SRS Responses to SCDHEC Comments on the April 2017 Revision 0 DRAFT protocol and the accompanying November 2020 Revision 0a Draft protocol have been prepared to address the program issues identified in Items 1 through 4 above. Please note that the revisions required to update the protocol were extensive and a redline document was not reader-friendly. For this reason, a clean copy of the November 2020 Revision 0a Draft protocol is attached to aid in your review. For reference, the April 2017 Revision 0 Draft protocol is also attached.

A list of projected Facility Decommissioning Evaluation and Decommissioning Project Final Report submittals for Fiscal Year 2021 to 2023 is attached. Please note that the list is for planning purposes only and is subject to change based on funding.

Please review the draft responses to the SCDHEC Comments on the April 2017 Revision 0 DRAFT protocol and reply by **COB, December 31, 2020** if the responses are acceptable or if a comment resolution conference call or meeting is required. For questions related to the attached materials, please contact Brian Hennessey at 803-952-8365, [brian.hennessey@srs.gov](mailto:brian.hennessey@srs.gov) or Dena Brett at 803-952-6031, [dena.brett@srs.gov](mailto:dena.brett@srs.gov).

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](mailto: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



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