



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

**JUL - 8 2020**

Ms. Susan B. Fulmer, P. G., Manager  
Federal Remediation Section  
Division of Site Assessment, Remediation and Revitalization  
Bureau of Land and Waste Management  
South Carolina Department of Health and Environmental Control  
2600 Bull Street  
Columbia, South Carolina 29201

Mr. Jon Richards  
Savannah River Remediation Project Manager  
Superfund Division  
U. S. Environmental Protection Agency, Region 4  
61 Forsyth Street, SW  
Atlanta, Georgia 30303

Dear Ms. Fulmer and Mr. Richards:

**SUBJECT:** Decommissioning Project Final Report (DPFR) Building 728-N, Shipping Cask and Railroad Car Repair Facility (V-PCOR-N-00022, Revision 1, 06/30/2020) and Savannah River Site's Responses to the Regulatory Comments on the Revision 0 Document

The U.S. Department of Energy (DOE) is submitting the subject information for your review. The DOE submitted the *Decommissioning Project Final Report (DPFR) Building 728-N, Shipping Cask and Railroad Car Repair Facility* (V-PCOR-N-00022, Revision 0, March 18, 2020) for regulatory review on April 7, 2020. The South Carolina Department of Health and Environmental Control (SCDHEC) provided comments on the DPFR on June 8, 2020. The U.S. Environmental Protection Agency (EPA) approved the DPFR on June 18, 2020. The final Savannah River Site's responses to the SCDHEC's comments were incorporated into the Revision 1 DPFR.

Hard copies and compact disks are enclosed according to the agreed upon distribution. Please review the enclosed document and provide your response within thirty (30) days of receipt. The effort and time that the SCDHEC and EPA have given on the subject facility are greatly appreciated.

Ms. Susan Fulmer  
Mr. Jon Richards

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Questions from you or your staff may be directed to me at (803) 952-8365.

Sincerely,

**BRIAN  
HENNESSEY**

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HENNESSEY  
Date: 2020.07.07 12:33:37  
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Brian T. Hennessey  
SRS Remedial Project Manager  
Infrastructure and Area Completion Division

IACD-20-169

Enclosures:

1. Decommissioning Project Final Report (DPFR) Building 728-N, Shipping Cask and Railroad Car Repair Facility (V-PCOR-N-00022, Revision 1, 06/30/2020)
2. Final SRS Responses to SCDHEC Comments on the Decommissioning Project Final Report (DPFR): Shipping Cask and Railroad Car Repair Facility, 728-N, V-PCOR-N-00022, Revision 0, March 18, 2020

cc w/o encl:

J. E. Blalock, SCDHEC-Columbia  
G. K. Taylor, SCDHEC-Columbia  
S. French, SCDHEC-Columbia  
M. Reece, SCDHEC-Columbia  
T. R. Fuss, SCDHEC-Aiken Environmental Affairs Office  
B. Cameron, SCDHEC-Aiken Environmental Affairs Office  
G. O'Quinn, SCDHEC-Aiken Environmental Affairs Office  
R. H. Pope, EPA-Atlanta

cc w/encl:

K. L. Beatty, SCDHEC-Aiken Environmental Affairs Office

**Final SRS Responses to SCDHEC Comments on the  
Decommissioning Project Final Report (DPFR): Shipping Cask and Railroad Car Repair  
Facility, 728-N, V-PCOR-N-00022, Revision 0, March 18, 2020**

**Comments Received June 8, 2020**

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General Comments

1. The document's conclusion section states: "The remaining structure is free of physical, chemical and radiological hazards; therefore, it needs no further decommissioning action." Based on the Cs-137 concrete slab data and resulting risk it represents, falling in the 10E-6 to 10E-4 range, the Department does not agree that there are no radiological hazards remaining at the slab. This language should be removed throughout the document, and discussion as to why further action isn't necessary should be included. Additionally, the conclusion section should be revised to state how the unit will be managed during the 40 year wait period and how contaminants will not be released into the environment. [The ROD for N-Area Area Operable Unit is currently scheduled in the Federal Facility Agreement (FFA) for March 2061.]

**Response: Agree.**

**The last paragraph of section 1.0, SUMMARY, of the Rev. 1 DPFR will be revised as follows:**

**“Contaminant fate and transport analysis was performed using the Vadose Zone Contaminant Migration Model - Multi-Layered<sup>®</sup> (VZCOMML<sup>®</sup>), which accounts for decay processes, infiltration rate, soil properties, vadose zone thickness, and chemical behavior. Based on this evaluation, there are no contaminant migration to groundwater concerns. Residual contamination and risk associated with facility remnants will be addressed during remedial assessment of the N-Area Operable Unit.”**

**The second paragraph of section 6.01, Final Facility Condition and Remaining Hazards, of the Rev. 1 DPFR will be revised as follows:**

**“All decommissioning activities have been completed including waste disposal, in accordance with State and Federal regulations. Even though the concrete floor slab is slightly above surrounding grade, there are no physical hazards associated with the remaining structure, since it is not located in a trafficked area. No further decommissioning action is required.”**

**Section 6.03, Post Decommissioning Requirements, of the Rev. 1 DPFR will be revised as follows:**

**~~“The remaining structure (slab) is free of physical, chemical, and radiological hazards; therefore, it needs no further decommissioning action. The residual~~**

**Draft SRS Responses to SCDHEC Comments on the  
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radiological risk is considered an upper bounding calculation for the industrial worker scenario because it is conservatively derived considering MDA values that were relatively high and acknowledging that 9 of 10 samples were non-detect. Radiological surveys identified no residual radiological hazards that warrant posting or monitoring as part of the SRS Radiological Control Program. No surveillance and maintenance (S&M) activities were identified for the remaining slab structure by SRS's Radiological Control program while awaiting area completion. To ensure facility remnants are addressed during the N-Area completion process, Building 728-N will be added to Appendix C.4 of the Federal Facility Agreement for the SRS. The SRS Area Completion Project will address the remaining contamination during N-Area completion activities."

The first paragraph of section 7.0, CONCLUSION/RECOMMENDATIONS, of the Rev. 1 DPFR will be revised as follows:

"Building 728-N was demolished to grade and the foundation has been left in place. All decommissioning activities have been completed, including waste disposal in accordance with Federal and State regulations. The remaining structure is free of physical, chemical, and radiological hazards; therefore, it needs no further decommissioning action. The residual radiological risk is considered an upper bounding calculation for the industrial worker scenario because it is conservatively derived considering MDA values that were relatively high and acknowledging that 9 of 10 samples were non-detect. Radiological surveys identified no residual radiological hazards that warrant posting or monitoring as part of the SRS Radiological Control Program. No S&M activities were identified for the remaining structure, because it poses no threat to human health or the environment, while awaiting area completion."

Responsible Party: Ken Blankenship, (803) 952-8612, [john.blankenship@srs.gov](mailto:john.blankenship@srs.gov)