



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

**APR 13 2023**

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

Dear Ms. Fulmer:

**SUBJECT:** DOE Response to SCDHEC Comments on FY2021 Annual Review of the E-Area Low-Level Waste Facility Performance Assessment (SRNL-STI-2022-00018, Revision 0, March 2022) dated January 10, 2023

Reference: Letter, S. B. Fulmer (SCDHEC) to K. Crawford (SRNS), *FY21 Annual Review of the E-Area Low-Level Waste Facility performance Assessment (SRNL-STI-2022-00018, Revision 0, March 2022) dated January 10, 2023*, dated February 22, 2023 (SRNS-OS-2023-00052)

Although the FY2021 Annual Performance Assessment (PA) Review for the E-Area Low-Level Waste Facility (E-Area LLWF) was provided for information only, the U.S. Department of Energy (DOE) appreciates South Carolina Department of Health and Environmental Control's (SCDHEC) comments on the report (Reference).

As stated in the *Interim Record of Decision Remedial Alternative Selection for the E-Area Low-Level Waste Facility, 643-26E (Slit Trench Disposal Units 1 and 2) (U)* (SRNS-RP-2000-00538, Revision 1, November 2009), "...the agreement to place the E-Area LLWF in the FFA increases regulatory participation in the final closure decisions for the entire E-Area LLWF. In all other respects, the USDOE will continue to operate the E-Area LLWF under its AEA (Atomic Energy Act) authority. The entire E-Area LLWF is currently in the operational phase." The Interim Record of Decision also states, "Since this is an interim action, quantitative remediation goals (i.e., site-specific concentrations used as cleanup criteria) are not specified."

Depressions in the operational stormwater runoff covers do not require repair, in accordance with the *Interim Remedial Action Implementation Plan for the E-Area Low-Level Waste Facility, 643-268 (Slit Trench Disposal Units 1 - 5) (U)* (SRNS-RP-2009-01213, Revision 1, March 2010). Tears or cracks will be repaired if found during annual inspections (Interim Remedial Action Implementation Plan, p. 31).

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Lysimeters are placed in the unsaturated zone beneath the trenches, above the water table, and are used in evaluating the overall performance of the facility. If performance objectives are not met during the future operation of the facility, DOE will take actions to meet those objectives in accordance with DOE Order 435.1, *Radioactive Waste Management*, requirements. Any actions taken would be described in the PA report following those actions. If groundwater wells at the 100-meter compliance point are ever exceeded, DOE will notify SCDHEC upon sampling confirmation.

Please contact me at (803) 952-8365 or Sean Protzman, DOE-Savannah River Low-Level Waste Program Manager, at (803) 208-0125, if you have any questions or wish to discuss this report further.

Sincerely,

**Brian T. Hennessey**

Digitally signed by Brian T. Hennessey  
Date: 2023.04.13 13:39:29 -04'00'

Brian T. Hennessey  
FFA Project Manager, DOE-Savannah River  
Remediation and Deactivation & Decommissioning Division

RDDD-23-005

cc:

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