



AUG 24 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

Mr. Jon Richards
Savannah River Site Remedial 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: Request for Approval of the Operable Unit Strategy Change for the Sandblast Area CMH-002 (NBN) and the Spill on 02/01/57 of Unknown of Seepage Basin Pipe Leak from 904-44G (NBN), SEMS Number: 61

The U.S. Department of Energy (DOE) is submitting this letter to document the discussions from the May 25, 2023, and August 17, 2023, Microsoft Teams Operable Unit (OU) Strategy Meetings for the Sandblast Area CMH-002 (NBN) and the Spill on 02/01/57 of Unknown of Seepage Basin Pipe Leak from 904-44G (NBN) OU currently listed in Appendix C, *RCRA/CERCLA Units List*, of the Federal Facility Agreement (FFA). Personnel from the DOE, South Carolina Department of Health and Environmental Control (SCDHEC), U.S. Environmental Protection Agency – Region 4 (EPA), and Savannah River Nuclear Solutions, LLC (SRNS) participated in both meetings. The purpose of the meetings was to obtain Core Team (DOE, SCDHEC, and EPA) agreement on the administrative strategy for the two units that comprise this OU. SRNS personnel presented historical information and updated risk assessment information, as appropriate, and administrative path forward recommendations for both units.

As a result of the meetings, the Core Team agreed that the current FFA milestone for the submittal of a Resource Conservation and Recovery Act (RCRA) Facility Investigation/Remedial Investigation (RFI/RI) Work Plan for the Sandblast Area CMH-002 (NBN) and Spill on 02/01/57 of Unknown of Seepage Basin Pipe Leak from 904-44G (NBN) OU (due September 22, 2023) and all subsequent milestones for the OU will no longer be required. The Sandblast Area CMH-002 (NBN) will be added to the H-Area Operable Unit (HAOU). The Spill on 02/01/57 of Unknown of Seepage Basin Pipe Leak from 904-44G (NBN) will be moved from Appendix C to Appendix G.1, *Areas to Be Investigated*. FFA Appendices C, D, E, and G, as applicable, will be revised to reflect these changes. Details regarding these changes are discussed below.

AUG 24 2023

Ms. Susan Fulmer
Mr. Jon Richards

2

Sandblast Area CMH-002 (NBN)

The remedial decision schedule for the Sandblast Area CMH-002 (NBN) will be realigned with the HAOU. Appendix C will be revised to add the Sandblast Area CMH-002 (NBN) to the HAOU. Appendices D and E, as applicable, of the FFA will be revised to reflect the appropriate changes to regulatory document submittal dates. The justification to redefine the strategy in support of the remedial decision is due to the following:

- The Sandblast Area CMH-002 (NBN) is within the center of the HAOU and will become part of a larger area remedial investigation and remedial decision in H Area once facility operations shut down.
- Sandblast Area CMH-002 (NBN) is adjacent to the north side of H-Area Sand Filters 294-H and 294-1H. These Sand Filters will remain operational for many years to support the H-Area Canyon operations. The potential for future releases exists during the operational phase and during the decommissioning of the H-Area Sand Filters.
- The Sandblast Area CMH-002 (NBN) area is not easily accessible because of the physical obstacles in the area, including several feet of riprap cover, directly related to the design of the facility.

Spill on 02/01/57 of Unknown of Seepage Basin Pipe Leak from 904-44G (NBN)

Reference: *Site Evaluation Report for the Spill on 2/1/57 of Unknown of Seepage Basin Pipe Leak from 904-44G (NBN) (U)* (WSRC-RP-2003-4049, Revision 0, June 2003)

The FFA administrative pathway for the Spill on 02/01/57 of Unknown of Seepage Basin Pipe Leak from 904-44G (NBN) is to move the unit from Appendix C to Appendix G.1 and then implement a maintenance action to excavate a cesium-137 (Cs-137)-contaminated hotspot (at sample point HSB-04) within the unit boundary (see reference). Once the maintenance action is completed, an addendum to the 2003 Site Evaluation Report (SER) will be submitted for regulatory review. The SER addendum will present an updated risk evaluation using post-operations and maintenance (O&M) activity levels with the recommendation that the unit be moved to Appendix G.2, *Areas Determined to Require No Further Response Action*, upon regulatory approval of the addendum. The basis for this change in strategy is as follows:

- Based on the decay-corrected sample data obtained during the 2002 site evaluation, Cs-137 contamination in surface soil is elevated above background concentrations at sample point HSB-04. The decay-corrected Cs-137 activity level at location HSB-04 is 6.3 picocuries per gram (pCi/g); however, the 95% UCL activity level for the entire exposure area is near background at 0.714 pCi/g (background is 0.68 pCi/g). Removal of the HSB-04 hotspot (0 to 1 foot depth; laterally to adjacent sample locations) will ensure Cs-137 surface soil concentrations are consistent with background levels over the entire exposure area, improving worker safety.

AUG 24 2023

Ms. Susan Fulmer
Mr. Jon Richards

3

- Excavation of the radiological hotspot under a Comprehensive Environmental Responses Compensation and Liability Act (CERCLA) Operations & Maintenance Plan is within the guidelines of the plan as it allows for operational/maintenance activities to be conducted at Savannah River Site within FFA RCRA/CERCLA units and Site Evaluation Areas. The excavation will support grounds maintenance (turf, monitoring well, and road maintenance).
- The status/completion of the maintenance action will be provided in the annual FFA Removal Action Report.
- An FFA milestone in Appendix E will be established to submit an SER addendum to include streamlined risk and principal threat source material evaluations using decay-corrected data from the 2003 SER after the completion of the maintenance action. The Revision 0 addendum will be submitted by September 30, 2025, and will require SCDHEC and EPA review and approval. The 2003 SER will be included with the submittal to aid in the review of the addendum.

Please review the information contained in this letter and the enclosure and provide your approval of the OU strategy change by September 15, 2023. Questions from you or your staff may be directed to me at (803) 952-8365.

The effort and time that the SCDHEC and EPA have given on the subject units are greatly appreciated.

Sincerely,

Brian T. Hennessey Digitally signed by Brian T. Hennessey
Date: 2023.08.23 08:55:00 -04'00'

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

RDDD-23-027

cc:

J. Blalock, SCDHEC-Columbia
S. French, SCDHEC-Columbia
M. Reece, SCDHEC-Columbia
G. K. Taylor, SCDHEC-Columbia
G. Stewart, SCDHEC-Columbia
T. R. Fuss, SCDHEC-Aiken Environmental Affairs Office
G. O'Quinn, SCDHEC-Aiken Environmental Affairs Office
B. A. Cameron, SCDHEC-Aiken Environmental Affairs Office
K. L. Beatty, SCDHEC-Aiken Environmental Affairs Office
H. L. Herlong, SCDHEC-Aiken Environmental Affairs Office
J. Dawson, EPA - Atlanta