

Shelia Mcfalls

From: Richards, Jon M. <Richards.Jon@epa.gov>
Sent: Monday, April 19, 2021 9:54 AM
To: HENNESSEY, BRIAN
Cc: Shelia Mcfalls
Subject: [EXTERNAL] RE: 651-6G

Yes EPA agrees 651-6G can go in App K.2

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From: brian.hennessey@srs.gov <brian.hennessey@srs.gov>
Sent: Monday, April 19, 2021 9:25 AM
To: Richards, Jon M. <Richards.Jon@epa.gov>
Cc: Shelia.Mcfalls@srs.gov
Subject: 651-6G

Jon, I meant to ask you about this last week when you were here. Regarding 651-6G (PAR Pond Transformer Substation), see the email below. Please let us know if you concur that 651-6G is ready to go to K.2 since the revised protocol now allows it, or if we need to discuss this.

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 DPFs 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

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Thanks-

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“A problem well-stated is half solved.” - *Charles Kettering, American Inventor*