



SRNS-OS-2024-00082

ENVIRONMENTAL COMPLIANCE &

March 20, 2024

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Ms. Avery G. Hammett, SRS Remedial Project Manager
 Remediation and Deactivation & Decommissioning Division
 U. S. Department of Energy
 Savannah River Operations Office
 Post Office Box A
 Aiken, South Carolina 29802

AREA COMPLETION PROJECTS

Re: Seventh Five-Year Remedy Review Report for Savannah River Site Operable Units with Native Soil Covers and/or Land Use Controls (U), (SRNS-RP-2023-00715, Revision 0, December 2023) received December 28, 2023.

Dear Ms. Hammett:

The Department has completed its review of the above referenced document pursuant to the Savannah River Site Federal Facility Agreement. The attached comments were generated as a result of this review. These comments must be addressed prior to final approval of the above referenced document. As specified in Section XXII, Review/Comment on Documents, the appropriate technical staff will be available to participate in a joint DOE/EPA/DHEC comment resolution meeting to discuss these comments, if necessary.

To schedule a meeting to resolve the attached comments or to obtain further information, please contact me at (803) 898-4331.

Sincerely,

Susan B. Fulmer Digitally signed by Susan B. Fulmer
 Date: 2024.03.20 14:37:05 -04'00'

Susan B. Fulmer, P.G., Manager
 Federal Remediation Section
 Division of Site Assessment, Remediation, Revitalization
 Bureau of Land and Waste Management

cc: C. L. Bergren, SRNS-ACP (Signed Original)
 Travis Fuss, Aiken Environmental Affairs Office (via email)
 Jon Richards, EPA Region IV
 Heather Cathcart, BLWM

**South Carolina Department of Health and Environmental Control Comments on:
Seventh Five-Year Remedy Review Report for Savannah River Site Operable Units with Native
Soil Covers and/or Land Use Controls (U), (SRNS-RP-2023-00715, Revision 0, December 2023)
received December 28, 2023.**

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General Comments

1. Native Soil Covers are included in the title of this document and are included as part of the remedy for several operable units (OU); however, there is very little mention of these soil covers for each applicable OU. The following appendices contain OUs that are either listed in Table A-3 under compacted native soil covers or mention soil covers as part of the remedy: C (ECODS C-1; listed in Table A-3 only, soil covers are not mentioned anywhere in Appendix C), D (listed in Table A-3; soil covers do not appear to be part of the remedy for the reactor complexes), E, F, H (Central Shop Burning/Rubble Pit (631-5G); not listed in Table A-3), I, J, L and M. These appendices should be revised to include mention of native soil covers where applicable. For the sake of clarity, the following sections of each applicable appendix should be revised for inclusion: Section IV Remedy Implementation (Appendix C), Section IV System Operations/Operations and Maintenance (Appendices C, E, F and H), Checklist Section 1 Remedy Includes, and Checklist Section XI Adequacy of O&M.

Specific Comments

1. Table 2, SRS OUs with LUCs, page 25. The LUCs acreage listed for the Wetland Area at Dunbarton Bay OU is 25 acres. Table A-3 lists the acreage as 38 acres, and Appendix N page N-7 mentions 39 acres. Please revise for consistency.
2. Table 3, LUC Summary Table, page 28. Groundwater is listed as a media that does not support UU/UE based on current conditions for Gunsite 012. Only soil is mentioned as media associated with this OU in Appendix G, Section III, Background (page G-1), and further discussion in this appendix indicates that groundwater contamination is not a concern for this OU. Please correct this discrepancy.
3. Table 3, LUC Summary Table, page 30. Please include buried debris as a media associated with R-Area Bingham Pump Outage Pits (RBPOP) and R-Area Unknown Pits (RUNK) OU to be consistent with language in Appendix L, Section III, Background (first paragraph).
4. Table 3, LUC Summary Table, page 31. Please include surface ash as a media associated with Wetland Area at Dunbarton Bay OU to be consistent with language in Appendix N, Section III, Background.
5. Table 5, Protectiveness Determination/Statements from the Sixth Five-Year Remedy Review for SRS OUs with Native Soil Covers and/or LUCs, page 35. The Protectiveness Determination for CAOOU is listed as "NA", yet according to the Sixth Five-Year Review Report and Table 8, the remedy at CAOOU is protective of human

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health and the environment. Additionally, this table which references protectiveness statements from the previous five-year review report includes the Wetland Area at Dunbarton Bay OU although this OU was not included in the previous report.

6. Table A-3, Summary of Remedial Actions without Operating Equipment at SRS, page A-11. C-, K- and L-Reactor Complexes are each listed under Compacted Native Soil; however, these OUs do not appear to have native soil covers. Also, CSBRP-5G is not listed under Compacted Native Soil, although a soil cover is mentioned in Appendix H (page H-4) (see General Comment #1).
7. Appendix E, Section IV, System Operations/Operations and Maintenance, page E-5. The actual O&M cost for the ECODS L-1, N-2, P-2 and R-1A, R-1B and R-1C OU is listed as \$34,124; Tables 4 and E-2 list \$39,582. Please correct.
8. Appendix I, Section V, Progress Since Last Review, page I-5. The first sentence states that this is the fifth five-year review for the KBPOP OU, and page I-1 states that this is the sixth, which appears to be correct according to Table I-1. Please correct.
9. Appendix K, Section IV System Operation and Maintenance, page K-14. The estimated direct O&M cost from FY 2019 to FY 2023 is \$614,600; the estimated cost listed in Table 4, page 34 and Table K-3, page K-36 is \$327,500. Please correct.
10. Appendix L, Section V Progress Since Last Review, page L-6. This section mentions that this is the fourth five-year remedy review for RBPOP and RUNK OU. The first sentence of Section I, page L-1 correctly refers to this report as the fifth five-year review, yet Table L-1, page L-17 lists only 3 previous five-year reviews. It appears that the previous five-year review from November 5, 2019 was inadvertently omitted from Table L-1 and reflected in the statement on page L-6. Please revise.