



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

NOV 17 2022

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: Savannah River Site's Responses to the Regulatory Comments on Decommissioning Project Final Report for Building 484-12D, D-Area Storage Building (V-PCOR-D-00047, Revision 0, July 18, 2022)

The U. S. Department of Energy (DOE) is submitting the subject comment responses for your review and approval. The Savannah River Site submitted the Decommissioning Project Final Report (DPFR) for Building 484-12D, D-Area Storage Building (V-PCOR-D-00047, Revision 0, July 18, 2022) on July 20, 2022. The South Carolina Department of Health and Environmental Control (SCDHEC) approved and the U. S. Environmental Protection Agency (EPA) provided comments on the DPFR on September 19, 2022 and September 28, 2022, respectively. The comment responses, once approved, are part of the DPFR for Building 484-12D, D-Area Storage Building by incorporation and the document is thereby approved.

Please review the responses with the goal of responding within thirty days (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, or the DOE Federal Project Director, Ms. Karen Adams, at (803) 952-7871.

Sincerely,

Brian T. Hennessey

Digitally signed by Brian T. Hennessey
Date: 2022.11.17 09:36:23 -05'00'

Brian T. Hennessey
SRS Remedial Project Manager
Infrastructure and Area Completion Division

IACD-23-111

Enclosure:

SRS Responses to EPA Comments on the Decommissioning Project Final Report, Building 484-12D, D-Area Storage Building (V-PCOR-D-00047, Revision 0, July 18, 2022)

cc w/o encl:

J. Blalock, SCDHEC-Columbia
G. K. Taylor, SCDHEC-Columbia
G. Stewart, SCDHEC-Columbia
S. French, SCDHEC-Columbia
M. Reece, 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
H. L. Herlong, SCDHEC-Aiken Environmental Affairs Office
R. H. Pope, EPA-Atlanta

cc w/encl:

D. Lloyd, EPA-Atlanta
K. L. Beatty, SCDHEC-Aiken Environmental Affairs Office

**SRS RESPONSES TO
EPA COMMENTS ON THE
DECOMMISSIONING PROJECT FINAL REPORT,
BUILDING 484-12D, D-AREA STORAGE BUILDING, JULY 2022**

Comments Received: 09/28/2022

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EPA COMMENTS

1. The Decommissioning Project Final Report, Building 484-12D, D-Area Storage Building, dated July 2022 (the DPFR) did not provide the decommissioning cost and performance information as stated in the Deactivation and Decommissioning (D&D) Core Team Protocol for Review and Concurrence of Facility Decommissioning Evaluations and Decommissioning Project Final Reports document, dated February 2021 (the D&D Protocol). For example, the text in Section 1.0 (Introduction) of the D&D Protocol states “The DPFR describes the decommissioning project activities and accomplishments, final facility status, cost, and performance information.” It is noted, the DPFR report included the project activities and the final facility status; however, the cost or performance information by Community Reuse Organization (CRO) and CTI and Associates Inc. (Savannah River Nuclear Solutions’ mentor protégé subcontractor) was not provided. Please revise the DPFR to include/reference the cost and performance information as stated in the D&D Protocol.

Response: Clarification

Based on Savannah River Site (SRS) responses to previous U.S. Environmental Protection Agency (EPA) comments on various D-Area Decommissioning Project Final Reports (DPFRs) (IACD-22-131, dated February 24, 2022), SRS revised and submitted the *Core Team Protocol for Review and Concurrence on Facility Decommissioning Evaluations and Decommissioning Project Final Reports* (SRNS-RP-2021-00120, Revision 1 Redline, August 2022) for EPA and South Carolina Department of Health and Environmental Control (SCDHEC) review on August 12, 2022. The Revision 1 Redline protocol was approved by SCDHEC and EPA on September 7, 2022 (SRNS-OS-2022-00284) and September 28, 2022 (SRNS-OS-2022-306), respectively. The final Revision 1 protocol was submitted to EPA and SCDHEC on October 6, 2022. This revision of the protocol clarified that cost and performance data is not included in Simple Model and Integrated Sampling Model DPFRs. Building 484-12D was decommissioned as a Simple Model facility; therefore, cost and performance data is not included in the DPFR. No change to the document is proposed.

Responsible Party: Brianna Zawacki, (803) 952-6533, Brianna.Zawacki@srs.gov

2. **Section 1.0, Summary, Page 6 of 12, and Section 6.02, Risk Assessment Summary, Page 9 of 12:** The text in the second paragraph indicates the building slab was only observed before, and not after, structure demolition for evidence of contamination, which is inconsistent with the text in Section 6.02 (Risk Assessment). For example, the last sentence in Section 6.02 states, “Since there was no evidence of contamination on the slabs either before or after structure demolition, no final verification survey was

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required.” Please revise the text in Section 1.0 to state, “Since there was no evidence of contamination on the slabs either before or after structure demolition, no final verification survey was required.”

Response: Agree with Clarification.

The referenced sentence in Section 1.0 should have stated that there was no evidence of contamination on the slabs either before or after structure demolition and no final verification survey was required. In future reports, SRS will ensure that the text in Section 1.0 and Section 6.02 are consistent. No change to the document is proposed.

Responsible Party: Brianna Zawacki, (803) 952-6533, Brianna.Zawacki@srs.gov

- 3. Section 2.01, Facility Description, Page 7 of 12:** The text states that the building was used primarily for storage and fabrication of insulation materials; however, it is unclear of the types or composition of insulating materials that were fabricated. Please revise Section 2.01 to clarify the type and composition of insulation materials that were fabricated at Building 484-12D to ensure that no chemical, hazardous, or radioactive materials were associated with this structure.

Response: Clarification.

The building was a standard storage structure used primarily for storage and fabrication of insulating materials. Review of records, walkdowns, and personnel interviews indicate that the insulating materials were calcium silicate and fiberglass; they were non-asbestos. No chemical, hazardous, or radioactive materials were ever present in the building and no chemical or radiological processes were performed in the building (i.e., no chemical, mechanical, or electrical energy or interactions was performed to change the state of an input material or to produce a new output product). No change to the document is proposed.

Responsible Party: Brianna Zawacki, (803) 952-6533, Brianna.Zawacki@srs.gov

- 4. Section 6.02, Risk Assessment Summary, Page 9 of 16:** The text states, “A review of the existing characterization data, process/building history, sample data and walk downs of the facility prior to decommissioning supported the determination that Building 454-D and its ancillary structures met the criteria of a Clean Building, Simple Model as described in Manual 1C, Procedure 501;” however, Section 3.0 (Decommissioning Model Approval) states that there was no regulator walk down of the facility due to COVID-19 travel restrictions. As such, it is unclear which stakeholders participated in walk down evaluations. Please revise Section 6.02 to identify the stakeholders that

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participated in the walk down assessments that took place prior to decommissioning Building 484-12D.

Response: Clarification.

As stated in Section 3.0, field walk downs were performed with SRS stakeholders involved in the D&D work such as Department of Energy, EC&ACP Engineering, Project Management, Safety, Industrial Hygiene, Environmental Compliance Authority, etc. A facility overview and walk down was not pre-scheduled with EPA and SCDHEC. However, the FDE submittal letters stated that EPA and SCDHEC could contact DOE if the regulatory agencies were interested in an overview and field visit. Neither EPA nor SCDHEC contacted DOE for an overview or field visit due to COVID-19 travel restrictions. No change to the document is proposed.

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