



UNITED STATES ENVIRONMENTAL PROTECTION  
AGENCY

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January 04, 2022

ENVIRONMENTAL COMPLIANCE &

Mr. Brian Hennessey, 730-B  
SRS Remedial Project Manager  
Savannah River Operations Office  
Area Completion Projects  
Post Office Box A  
Aiken, South Carolina 29802

JAN - 4 2022

AREA COMPLETION PROJECTS

Dear Mr. Hennessey:

The U.S. Environmental Protection Agency (EPA) has reviewed the Department of Energy, Savannah River (DOE-SRS) Site Facility Decommissioning Project Final Reports (DPFRs) for the D-Area included below:

- 1) DPFR 485-D and 482-2D, Cooling Tower, dated 11-2-21
- 2) DPFR 710-16D Storage Building, dated 7-8-21
- 3) DPFR 704-7D, dated 7-12-21
- 4) DPFR 717-3D, D-Area Welding Shop, dated 7-8-21
- 5) DPFR 480-3D, Maintenance Field Office/Shop, dated 7-5-21

EPA cannot approve the above mentioned reports until the comments below have been addressed. Should you have any questions or concerns, please feel free to call me at on my cell number 404-229-9500.

Sincerely,

*Diedre Lloyd*

Diedre Lloyd  
Remedial Project Manager  
Restoration & Sustainability Branch  
Superfund Emergency & Management  
Division  
61 Forsyth Street, Region 4  
Atlanta, Ga 30303

cc: Angelia Holmes, DOE-SRS, Brian Hennessey, DOE-SRS, Phil Prater, DOE-SRS, Karen Adams, DOE-SRS, Chris Bergren, SRNS-ACP (Signed Original), Susan Fulmer, SCDHEC

**ENVIRONMENTAL PROTECTION AGENCY (EPA) COMMENTS**  
**ON THE DEPARTMENT OF ENERGY, SAVANNAH RIVER (DOE-SRS)**  
**SITE FACILITY DECOMMISSIONING PROJECT FINAL REPORTS (DPFRS) FOR:**

**DPFR 485-D AND 482-2D, COOLING TOWER, DATED 11-2-21**  
**DPFR 710-16D STORAGE BUILDING, DATED 7-8-21**  
**DPFR 704-7D, D-AREA MAINTENANCE BUILDING, DATED 7-12-21**  
**DPFR 717-3D, D-AREA WELDING SHOP, DATED 7-8-21**  
**DPFR 480-3D, MAINTENANCE FIELD OFFICE/SHOP, DATED 7-5-21**

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**EPA GENERAL COMMENTS: DPFR 485-D AND 482-2D, COOLING TOWER, DATED 11-2-21**

1. The Decommissioning Project Final Report, Buildings 485-D and 482-2D, D-Area Cooling Tower and Switchgear Building, V-PCOR-D-00061, Revision 0, dated November 2, 2021 (the DPFR) did not provide the decommissioning cost and performance information as stated in the Deactivation and Decommissioning Core Team Protocol for Review and Concurrence of Facility Decommissioning Evaluations and Decommissioning Project Final Reports document, dated November 2020 (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 and performance information by CTI and Associates, Inc. (Savannah River Nuclear Solutions' mentor protégé subcontractor) were not provided. Please revise the DPFR to include/reference the cost and performance information, as stated in the D&D Protocol
2. It is unclear whether the current conditions of the Cooling Tower Basin and Pump Basin remaining structures are free of physical hazards. According to Section 4.0 (Decommissioning Activities Completed, Page 9 of 17), the decommissioning end state for the Cooling Tower Basin was to remove all debris from the basin after demolition and leave open to the atmosphere. The Pump Basin decommissioning end state left the slab cover in place, including steel plates over the pump locations. As such, the Cooling Tower Basin is currently open to the atmosphere where precipitation may collect. Additionally, it appears the current condition at the Pump Basin leaves a large void space remaining below the ground surface. Please revise the DPFR to provide discussion of whether the current conditions at the Cooling Tower Basin and Pump Basin remain free of physical hazards and/or whether additional D&D activities will be taken for these structures to address the noted concerns.

**EPA SPECIFIC COMMENTS: DPFR 485-D AND 482-2D, COOLING TOWER, DATED 11-2-21**

1. **Section 1.0, Summary, Page 6 of 17:** 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 Summary). For example, the last sentence in Section 6.02 (Page 11 of 17) states, "Since

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

2. **Section 2.01, Facility Description, Page 7 of 17:** The text does not clearly describe whether the Cooling Tower Basin, or portions thereof, are constructed below the ground surface. For example, the text states the Cooling Tower Basin is approximately 63 feet (ft) long by 49 ft wide and 7 ft, 1-inch high at the shallowest section and 7 ft, 3 inches high proximal to the pump basin. However, the text also describes the concrete walls of the Cooling Tower Basin extended 3 ft above grade. Additionally, Section 4.0 (Decommissioning Activities Completed, Page 9 of 17) states the 485-D above grade structure was demolished to its concrete walls for the Cooling Tower Basin. Please revise the text to clarify whether the heights of the shallowest and highest sections described for the Cooling Tower Basin refer to the height of each wall section, including portions existing below grade.
3. **Section 6.02, Risk Assessment Summary, Page 10 of 17:** 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 and 485-D and 482-2D met the criteria of a Clean Building, Simple Model as described in Manual 1C, Procedure 501;” however, Section 3.0 (Decommissioning Model Approval, Page 8 of 17) 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 participated in the walk down assessments that took place prior to decommissioning Buildings 485-D and 482-2D.

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#### **EPA GENERAL COMMENTS: DPFR 710-16D STORAGE BUILDING, DATED 7-8-21**

1. The Decommissioning Project Final Report, Building 710-16D, Storage Building, V-PCOR-D-00065, Revision 0, dated July 8, 2021 (the DPFR) did not provide the decommissioning cost and performance information as stated in the Deactivation and Decommissioning Core Team Protocol for Review and Concurrence of Facility Decommissioning Evaluations and Decommissioning Project Final Reports document, dated November 2020 (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 and performance information by CTI and Associates, Inc. (Savannah River Nuclear Solutions’ mentor protégé subcontractor) were not provided. Please revise the DPFR to include/reference the cost and performance information, as stated in the D&D Protocol.
2. The DPFR states no chemical, hazardous or radioactive materials, and no chemical or radioactive processes were associated with the storage building; however, the nature of the small oil stain on concrete identified within Storage 8 is unclear. Please revise the

DPFR to explain the nature of the oil stained concrete when no history of chemical, hazardous or radioactive materials or processes were associated with Building 710-16D.

**EPA SPECIFIC COMMENTS: DPFR 710-16D STORAGE BUILDING, DATED 7-8-21**

1. **Section 1.0, Summary, Page 6 of 13:** The statement in the second paragraph asserting there was no evidence of contamination on the slab before structure demolition is inconsistent with the text in Section 2.01 (Facility Description, Pages 6 and 7 of 13). The text in Section 2.01 states a small oil stain was evident on the concrete within Storage 8, which was cleaned with Biosolve® during decommissioning. Please revise the text in Section 1.0 to address this discrepancy and the assertion that there was no evidence of contamination of the slab before structure demolition.
2. **Section 2.01, Facility Description, Page 6 of 13:** The description of the 710-16D Storage Building facility does not include a description of the concrete curbing surrounding the perimeter of the structure slab. In Appendix A (Photographs), Figure 3 [Building 710-16D (Looking Southeast) After Decommissioning], concrete curbing can be seen around the perimeter of the structure and appears to have been breached in several locations. Please revise the text in this section to include a description of the concrete curbing and the decommissioning process (e.g., breaching of the curbing to allow for drainage)
3. **Section 6.02, Risk Assessment Summary, Page 8 of 13:** 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 710-16D 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 participated in the walk down assessments that took place prior to decommissioning Building 710-16D.

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**EPA GENERAL COMMENTS: DPFR 704-7D, D-AREA MAINTENANCE BUILDING, DATED 7-12, 2021**

1. The Decommissioning Project Final Report (DPFR), Building 704-7D, D-Area Maintenance Building, V-PCOR-D-00064, Revision 0, dated July 12, 2021 (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 November 2020 (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 and performance information by CTI and Associates Inc. (Savannah River Nuclear Solutions’ mentor protégé subcontractor) were not provided. Please revise the DPFR to include/reference the cost and performance information as stated in the D&D Protocol.

**EPA SPECIFIC COMMENTS: DPFR 704-7D, D-AREA MAINTENANCE BUILDING, DATED 7-12, 2021**

- 1. Section 1.0, Summary, Page 6 of 13:** 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 Summary). For example, the last sentence in Section 6.02 (Page 10 of 13) states “Since there was no evidence of contamination on the slab either before or after structure demolition, no final verification survey was required.” Please revise the text in Section 1.0 to address this discrepancy and state “Since there was no evidence of contamination on the slab either before or after structure demolition, no final verification survey was required.”
- 2. Section 6.02, Risk Assessment Summary, Page 9 of 13:** 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 704-7D 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 summarize the stakeholders that participated in the walk down assessments that took place prior to decommissioning Building 704-7D.

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**EPA GENERAL COMMENTS: DPFR 717-3D, D-AREA WELDING SHOP, DATED 7-08-21**

- 1.** The Decommissioning Project Final Report, Building 717-3D, D-Area Welding Shop, V-PCOR-D-00063, Revision 0, dated July 8, 2021 (the DPFR) did not provide the decommissioning cost and performance information as stated in the Deactivation and Decommissioning Core Team Protocol for Review and Concurrence of Facility Decommissioning Evaluations and Decommissioning Project Final Reports document, dated November 2020 (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 and performance information by CTI and Associates, Inc. (Savannah River Nuclear Solutions’ mentor protégé subcontractor) were not provided. Please revise the DPFR to include/reference the cost and performance information, as stated in the D&D Protocol.
- 2.** The DPFR does not clearly state if the small sump located in the center of the largest room at the south end of the building was filled with grout. For example, the text in Section 4.0 (Decommissioning Activities Completed, Page 7 of 12) states that the Building 717-3D structure was demolished to its concrete slab and floor openings were filled with grout to achieve uniform thickness. However, Section 2.01 (Facility Description, Page 7 of 12) notes, “The building had a small sump in the center of the largest room in the building (south end) for drainage. The sump was covered with a metal grate and went to the ground surface below the slab.” In addition, Section 6.01 (Final Facility Condition and Remaining Hazards, Page 8 of 12) states, “The sump grate was removed and the sump was filled with cementitious material, grout.” Please revise the DPFR to clarify if floor openings that were filled with

grout included the small sump located in the center of the largest room at the south end of the building, as stated in Section 6.01.

**EPA SPECIFIC COMMENTS: DPFR 717-3D, D-AREA WELDING SHOP, DATED 7-08-21**

1. **Section 1.0, Summary, Page 6 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 Summary). For example, the last sentence in Section 6.02 (Page 8 of 12) states, “Since there was no evidence of contamination on the slab either before or after structure demolition, no final verification survey was required.” Please revise the text in Section 1.0 to address this discrepancy and state, “Since there was no evidence of contamination on the slab either before or after structure demolition, no final verification survey was required.”
2. **Section 6.02, Risk Assessment Summary, Page 9 of 12:** 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 717-3D met the criteria of a Clean Building, Simple Model as described in Manual 1C, Procedure 501;” however, Section 3.0 (Decommissioning Model Approval, Page 7 of 12) 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 participated in the walk down assessments that took place prior to decommissioning Building 717-3D.

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**EPA GENERAL COMMENTS: DPFR 480-3D, MAINTENANCE FIELD OFFICE/SHOP, DATED 7-5-21**

1. The Decommissioning Project Final Report (DPFR), Building 480-3D, Maintenance Field Office and Shop, V-PCOR-D-00062, Revision 0, dated July 5, 2021 (the DPFR) did not provide the decommissioning cost and performance information as stated in the Deactivation and Decommissioning Core Team Protocol for Review and Concurrence of Facility Decommissioning Evaluations and Decommissioning Project Final Reports document, dated November 2020 (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 and performance information by CTI and Associates Inc. (Savannah River Nuclear Solutions’ mentor protégé subcontractor) were not provided. Please revise the DPFR to include/reference the cost and performance information as stated in the D&D Protocol.

**EPA SPECIFIC COMMENTS: DPFR 480-3D, MAINTENANCE FIELD OFFICE/SHOP, DATED 7-5-21**

1. **Section 1.0, Summary, Page 6 of 13:** 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

Summary). For example, the last sentence in Section 6.02 (Page 9 of 13) states, “Since there was no evidence of contamination on the slab either before or after structure demolition, no final verification survey was required.” Please address this discrepancy and revise the text in Section 1.0 to state, “Since there was no evidence of contamination on the slab either before or after structure demolition, no final verification survey was required.”

2. **Section 2.01, Facility Description, Page 6 of 13:** It is unclear whether the description of the original construction of the siding, roof, and interior walls being made of asbestos containing materials was only noted in Revision 0, dated 11/11/2019, of Reference 8.02 as stated in the text. If the description of the original construction of the siding, roof, and interior walls being constructed of asbestos containing material was only noted in the Revision 0 dated 11/11/2019, and is not included in Reference 8.02 (i.e., Q-APG-D-00010, Revision 1, dated November 23, 2020, “Baseline Asbestos Inspection Report of Building 480-3D), please revise the text in this section and Section 8.0 (References) to include a unique reference to Revision 0 of Reference 8.02.
3. **Section 6.02, Risk Assessment Summary, Page 9 of 13:** 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 480-3D 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 the walk down evaluations. Please revise Section 6.02 to identify the stakeholders that participated in the walk down assessments that took place prior to decommissioning Building 480-3D.