

Shelia Mcfalls

From: Richards, Jon M. <Richards.Jon@epa.gov>
Sent: Thursday, January 07, 2021 1:35 PM
To: Shelia Mcfalls; Cathcahe (dhec.sc.gov); Lloyd, Diedre; Tufts, Jennifer; VanTrees, Craig; Fulmer, Susan; Fuss, Travis R.; Gregory N. O'Quinn (oquinngn@dhec.sc.gov); K. Leigh Beatty (beattykl@dhec.sc.gov); Bethany Cameron; HENNESSEY, BRIAN; Chris Bergren; Robert Shirley; Thelesia Oliver; Jeffcj Ward; Amy Meyer; pope.robert (epa.gov); Ross Fanning; J Ross; Manuel Terronez; John Blankenship; Dena Brett; Douglas Martinson; Joseph Burch; Kelsey Holcomb
Subject: RE: Draft SRS Resp to SCDHEC's Comments on D&D Core Team Protocol for Review & Concurrence on FDEs & DPFrs (ERD-EN-2016-0029, Rev 0a Draft, Apr 2017) & D&D Core Team Protocol for Review & Concurrence on FDEs & DPFrs (ERD-EN-2016-0029, Rev 0a Draft, Nov 20)

EPA has reviewed the D&D protocols, and all of the attachments as well as the state's comments/responses, and we don't have any remaining concerns with this. SRS has incorporated program updates and improvements in the D&D Protocol Rev.0a per the Draft SRS Responses.

But let us know, of course, if there's any calls to go over any of their remaining comments.

thanks

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From: Shelia.Mcfalls@srs.gov <Shelia.Mcfalls@srs.gov>
Sent: Tuesday, December 1, 2020 12:17 PM
To: Richards, Jon M. <Richards.Jon@epa.gov>; Cathcahe@dhec.sc.gov
Cc: Pope, Robert <Pope.Robert@epa.gov>; Lloyd, Diedre <Lloyd.Diedre@epa.gov>; Tufts, Jennifer <Tufts.Jennifer@epa.gov>; VanTrees, Craig <vantrees.craig@epa.gov>; Fulmer, Susan <fulmersb@dhec.sc.gov>; Fuss, Travis R. <FUSSTR@dhec.sc.gov>; Gregory N. O'Quinn (oquinngn@dhec.sc.gov) <oquinngn@dhec.sc.gov>; K. Leigh Beatty (beattykl@dhec.sc.gov) <beattykl@dhec.sc.gov>; Bethany Cameron <cameroba@dhec.sc.gov>; brian.hennessey@srs.gov; chris.bergren@srs.gov; Robert.Shirley@srs.gov; thelesia.oliver@srs.gov; jeffcj.ward@srs.gov; Amy.Meyer@srs.gov; ross.fanning@srs.gov; j.ross@srs.gov; manuel.terronez@srs.gov; john.blankenship@srs.gov; dena.brett@srs.gov; douglas.martinson@srs.gov; joseph.burch@srs.gov; Kelsey.Holcomb@srs.gov
Subject: Draft SRS Resp to SCDHEC's Comments on D&D Core Team Protocol for Review & Concurrence on FDEs & DPFrs (ERD-EN-2016-0029, Rev 0a Draft, Apr 2017) & D&D Core Team Protocol for Review & Concurrence on FDEs & DPFrs (ERD-EN-2016-0029, Rev 0a Draft, Nov 2020)

Jon and Heather,

Attached for your review are the Draft SRS Responses to SCDHEC Comments on the *Deactivation and Decommissioning (D&D) Core Team Protocol for Review and Concurrence on Facility Decommissioning Evaluations and Decommissioning Project Final Reports (ERD-EN-2016-0029, Revision 0 DRAFT, April 2017)*. We have also attached a November 2020 Revision 0a DRAFT protocol that incorporates the comment responses.

The SRS D&D program has evolved since the implementation of the program in the mid-2000s and initial development of the draft D&D protocol. For this reason, SRS has incorporated program updates and improvements in the attached

responses to SCDHEC comments on the April 2017 Revision 0 Draft protocol. A program chronology of the activities related to the D&D protocol development is provided below.

1. The initial D&D protocol stated that facilities decommissioned using the Integrated Sampling Model (ISM) could only be moved to FFA Appendix C.4. In November 17, 2011, SCDHEC requested that the draft D&D protocol be revised to also allow facilities decommissioned using the ISM to be moved to FFA Appendix K.2. (Reference: SCDHEC Comments on the Decommissioning Project Final Report (DPFR): PAR Pond Primary Transformer Substations, Building 651-6G, V-PCOR-G-00026, Revision 0, September 12, 2011).
2. On May 2, 2017, SRS submitted the *Deactivation and Decommissioning (D&D) Core Team Protocol for Review and Concurrence on Facility Decommissioning Evaluations and Decommissioning Project Final Reports (ERD-EN-2016-0029, Revision 0 DRAFT, April 2017)* for review and comment.
3. SRS received comments on the April 2017 Revision 0 DRAFT protocol from SCDHEC on June 2, 2017. During the May 14, 2020 Federal Facility Agreement Project Managers' Quarterly Conference Call, USEPA stated that they had no comments on the DRAFT protocol.
4. SRS received a related comment from SCDHEC on the Federal Facility Agreement Revision 0 Appendix K D&D Facilities for Fiscal Year (FY) 2020 (Print Date: 09/19/2019) on January 27, 2020. SRS submitted the Federal Facility Agreement Revision 1 Appendix K D&D Facilities for Fiscal Year (FY) 2020 (Print Date: 03/19/2020) and Savannah River Site's Responses to the Regulatory Comments on the Revision 0 Appendices C, G and K for FY2020 (Print Date: 09/19/2019) on March 26, 2020. The SCDHEC comment and SRS response related to Appendix K – D&D Facilities are as follows:

“SCDHEC Comment 1: In anticipation of the increase of D&D activities in the future, SCDHEC requests that the protocols, submitted electronically by DOE on May 2, 2017 and comments submitted electronically on June 2, 2017, be finalized. Also, SCDHEC requests that a meeting to discuss the protocols and upcoming activities be scheduled in FY2020 or the first quarter of FY2021.

Response to SCDHEC Comment 1: Agree. The Savannah River Site will schedule a meeting in FY2020 or the first quarter of FY2021 to discuss the protocols and upcoming D&D activities. The draft responses to SCDHEC's comments and a redline revision of the protocol will be submitted prior to the meeting.”

The attached Draft SRS Responses to SCDHEC Comments on the April 2017 Revision 0 DRAFT protocol and the accompanying November 2020 Revision 0a Draft protocol have been prepared to address the program issues identified in Items 1 through 4 above. Please note that the revisions required to update the protocol were extensive and a redline document was not reader-friendly. For this reason, a clean copy of the November 2020 Revision 0a Draft protocol is attached to aid in your review. For reference, the April 2017 Revision 0 Draft protocol is also attached.

A list of projected Facility Decommissioning Evaluation and Decommissioning Project Final Report submittals for Fiscal Year 2021 to 2023 is attached. Please note that the list is for planning purposes only and is subject to change based on funding.

Please review the draft responses to the SCDHEC Comments on the April 2017 Revision 0 DRAFT protocol and reply by **COB, December 31, 2020** if the responses are acceptable or if a comment resolution conference call or meeting is required. For questions related to the attached materials, please contact Brian Hennessey at 803-952-8365, brian.hennessey@srs.gov or Dena Brett at 803-952-6031, dena.brett@srs.gov.

Please contact me if you have any questions, comments, or concerns.

Thanks

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