



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

JAN 20 2021

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 Site Remedial 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 the Facility Decommissioning Evaluations (FDEs) for Building 710-16D, Storage Building (G-FDE-D-00046, Revision 1, September 29, 2020), Building 484-5D, D-Area Powerhouse Storage Building (G-FDE-D-00047, Revision 1, September 29, 2020), Building 483-3D, Electrical Control Building (G-FDE-D-00049, Revision 1, September 29, 2020), and Building 484-9D, D-Area Valve House (G-FDE-D-00055, Revision 1, September 29, 2020), Simple Model

The U. S. Department of Energy (DOE) is submitting the subject information for your review. On October 7, 2020, the DOE submitted the Revision 1 Facility Decommissioning Evaluations (FDEs) for Buildings 710-16D, 484-5D, 483-3D, and 484-9D and Savannah River Site's (SRS) responses to the regulatory comments on the Revision 0 FDEs for Buildings 480-3D, 704-7D, 710-16D, 484-5D, 483-3D, 485-D and 482-2D, 484-9D, and 717-3D. On November 16, 2020, SRS received the South Carolina Department of Health and Environmental Control's (SCDHEC) approval of the Revision 1 FDEs for Buildings 710-16D, 484-5D, 483-3D, and 484-9D and SRS' responses to the regulatory comments on the Revision 0 FDEs. On December 7, 2020, SRS received the U. S. Environmental Protection Agency's (EPA) approval of the comment responses. Additionally, on December 7, 2020, SRS received EPA's comments on the Revision 1 FDEs for Buildings 710-16D, 484-5D, 483-3D, and 484-9D. In their letter, EPA stated that they concurred that the Simple Model is appropriate for the FDEs.

SRS submitted the draft responses to EPA's comments via email on December 15, 2020. SCDHEC and EPA replied that the draft responses were acceptable on January 4, 2021 and January 6, 2021, respectively. Based on these replies, the final SRS' responses to EPA's comments are enclosed for your review. Please review the enclosures and provide your response within thirty (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: 2021.01.19 11:22:30 -05'00'

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

IACD-21-117

Enclosure:

Final SRS Responses to the EPA Comments on the Facility Decommissioning Evaluations (FDEs) for Building 710-16D, Storage Building, Rev. 1, Building 484-5D, D-Area Powerhouse Storage Building, Rev. 1, Building 483-3D, Electrical Control Building, Rev. 1, and Building 484-9D, D-Area Valve House, Rev. 1

cc w/o encl:

J. Blalock, SCDHEC - Columbia  
G. K. Taylor, SCDHEC - Columbia  
S. French, SCDHEC - Columbia  
M. Reece, SCDHEC - Columbia  
T. R. Fuss, SCDHEC – Aiken Environmental Affairs Office  
G. N. O'Quinn, SCDHEC – Aiken Environmental Affairs Office  
B. Cameron, 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

**FINAL SRS RESPONSES TO EPA COMMENTS ON THE  
FACILITY DECOMMISSIONING EVALUATIONS (FDEs) FOR:**

**BUILDING 710-16D, STORAGE BUILDING, REV 1  
BUILDING 484-5D, D-AREA POWERHOUSE STORAGE BUILDING, REV 1  
BUILDING 483-3D, ELECTRICAL CONTROL BUILDING, REV 1  
BUILDING 484-9D, D-AREA VALVE HOUSE, REV 1**

**DATED SEPTEMBER 29, 2020**

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EPA GENERAL COMMENTS for FDEs for Building 710-16D, Building 484-5D, Building 483-3D and Building 484-9D:

- 1) Please notify the D Area core team member (Diedre Lloyd) via email or phone if, during decommissioning of a Simple Model facility, some condition is identified that may contradict the Simple Model assumptions.

**Response: Agree.**

**SRNS will notify EPA core team member as requested. No changes to the documents are proposed.**

**Responsible Party: Ken Blankenship, (803) 952-8612, [john.blankenship@srs.gov](mailto:john.blankenship@srs.gov)**

- 2) Please provide one figure that depicts the relationship between the 4 buildings and their ancillary structures. This figure should also include all previously approved FDEs buildings and ancillary structures.

**Response: Agree.**

**See the attached aerial view of D-Area (Attachment 1) which shows the 4 buildings within the scope of these subject FDEs and their relationship to the 484-D Powerhouse, the D-Area Boiler and Process Water Treatment Facility, the 115 KV power company substation, and the buildings with previously approved FDEs. Due to the limited amount of space for labelling, Attachment 1 shows only each building's number. Showing each building name would obscure some of the respective facilities in the photo. Ancillary structures are too small to show on the aerial photo. See each**

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FACILITY DECOMMISSIONING EVALUATIONS (FDEs) FOR:**

**BUILDING 710-16D, STORAGE BUILDING, REV 1  
BUILDING 484-5D, D-AREA POWERHOUSE STORAGE BUILDING, REV 1  
BUILDING 483-3D, ELECTRICAL CONTROL BUILDING, REV 1  
BUILDING 484-9D, D-AREA VALVE HOUSE, REV 1**

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**individual FDE for photo(s) of ancillary structures. No changes to the documents are proposed.**

**Responsible Party: Ken Blankenship, (803) 952-8612, [john.blankenship@srs.gov](mailto:john.blankenship@srs.gov)**

3) Please inform EPA/SCDHEC upon property disposition to the SRS Community Reuse Organization (SRS CRO) from all DAOU FDEs via letter.

**Response: Clarification.**

**Regarding the four FDEs addressed by EPA's letter, none of the subject facilities is being dispositioned to the SRS CRO. No changes to the documents are proposed.**

- a. Please included a brief, estimated timeline and items (property disposition) in the letter, please let EPA know when a letter for the above requested letter is anticipated for completed FDEs.

**Response: Clarification.**

**Since none of the subject facilities is being dispositioned to the CRO, no timeline or property disposition is applicable and no letter is forthcoming. No changes to the documents are proposed.**

- b. Building 483-3D has been deemed of historical significance, please include information as to the disposition/plans for all FDEs inclusive of Building 483-3D which are of historical significance.

**Response: Clarification.**

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FACILITY DECOMMISSIONING EVALUATIONS (FDEs) FOR:**

**BUILDING 710-16D, STORAGE BUILDING, REV 1  
BUILDING 484-5D, D-AREA POWERHOUSE STORAGE BUILDING, REV 1  
BUILDING 483-3D, ELECTRICAL CONTROL BUILDING, REV 1  
BUILDING 484-9D, D-AREA VALVE HOUSE, REV 1**

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**The Historical Significance section of the FDE states: “A review has been conducted in accordance with a Programmatic Agreement. This review resulted in the publication of a Cultural Resources Management Plan (Reference 4) in which the facilities with historical significance are listed. Building 483-3D is listed as having historical significance in that reference. Mitigating actions will have to be completed as identified in that reference. These actions, along with proper notification to the South Carolina Historical Preservation Office, will be completed prior to initiation of work that significantly alters the physical appearance of the building.” In further clarification, in 2003 the State Historical Preservation Office (SHPO) “signed off” and is satisfied with the infrastructure Thematic Study and Heavy Water Area Study that handled the photography and narrative, so Building 483-3D can be demolished. No changes to the documents are proposed.**

**Responsible Party: Ken Blankenship, (803) 952-8612, [john.blankenship@srs.gov](mailto:john.blankenship@srs.gov)**

**EPA SPECIFIC COMMENTS for Building 483-3D, Electrical Control Building:**

- 4) Building 483-3D, Electrical Control Building, Page 4 of 14, first paragraph:** Text within this paragraph indicates: “The proposed decommissioning end state of the North Cable Trench is In Situ Disposal.” .....”a portion of the structure will remain intact after decommissioning.”
- a. Please include what equipment/components that will be left in the North Cable Trench

**Response: Clarification.**

**FINAL SRS RESPONSES TO EPA COMMENTS ON THE  
FACILITY DECOMMISSIONING EVALUATIONS (FDEs) FOR:**

**BUILDING 710-16D, STORAGE BUILDING, REV 1  
BUILDING 484-5D, D-AREA POWERHOUSE STORAGE BUILDING, REV 1  
BUILDING 483-3D, ELECTRICAL CONTROL BUILDING, REV 1  
BUILDING 484-9D, D-AREA VALVE HOUSE, REV 1**

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**As stated in the Scope section of the FDE, “Below grade equipment and components will be removed during decommissioning.” No Equipment or components will remain. Equipment and components entail cable trays and cables as discussed in the 5<sup>th</sup> paragraph of the Facility Description section of the FDE. Also as stated in the Scope section of the FDE, the proposed end state of the concrete N. Cable Trench is In Situ Disposal. No change to the document is proposed.**

**Responsible Party: Ken Blankenship, (803) 952-8612, [john.blankenship@srs.gov](mailto:john.blankenship@srs.gov)**

- 5) Building 483-3D, Electrical Control Building, Page 6 of 14, first paragraph:** The text within this paragraph indicates: “On each end of the 480V switchgear bank was an integral 2.4kV to 480 V Transformer. The northeast (AT1W) transformer .....goes overhead to the west and enters Building 483-3D. Note that the scope of this decommissioning ends at the end of the North Cable Trench Concrete Slab.
- a. Please clearly indicate if the transformer’s on either side of the North Cable Trench are included in this FDE and include the transformer designation for both transformers.

**Response: Clarification.**

**There are no transformers on either side of the North Cable Trench. In fact, there are no transformers in the scope of this FDE. The 2.4kV to 480V transformers were located inside the 483-3D building on either end of the North-South oriented 480V switchgear bank. All electrical equipment from within the building was previously removed (Reference FDE Figure 3 & 7). No change to the document is proposed.**

- b. Later in the document Transformers AT1W and AT2W are depicted and noted in text, are these the transformers located on either end of the North Cable Trench?

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FACILITY DECOMMISSIONING EVALUATIONS (FDEs) FOR:**

**BUILDING 710-16D, STORAGE BUILDING, REV 1  
BUILDING 484-5D, D-AREA POWERHOUSE STORAGE BUILDING, REV 1  
BUILDING 483-3D, ELECTRICAL CONTROL BUILDING, REV 1  
BUILDING 484-9D, D-AREA VALVE HOUSE, REV 1**

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**Response: Clarification.**

**No. The North Cable Trench sits North of 483-3D, parallel to the building's north wall (Reference FDE Figure 7). Transformers AT1W and AT2W were/are located outside the east wall of 483-3D (Reference FDE Figures 2, 3, 5, 6, & 7). No change to the document is proposed.**

- c. Please clearly indicate what portions beyond the North Cable Trench Concrete Slab are not part of this FDE.

**Response: Clarification.**

**The North Cable Trench, is defined as follows in the last paragraph on Page 7 of 14 of the FDE: "To the north of Building 483-3D is a cable trench (Figure 7). The cable trench used to contain many of the electrical cables leaving Building 483-3D to area loads. The cable trench is approximately 75' long by 6'11" wide and approximately 8' deep. There were six (6) vertically stacked cable trays running along the south wall of the trench. The cable trench is concrete and has three (3) hinged access plates. Mounted on and above the cable tray is a pipe and conduit bridge of steel construction." The trench extends from a point abeam the northeast corner of 483-3D westward to a point approximately 12'-6" west of the building's northwest corner. Figure 7 of the FDE shows the North Cable Trench, its concrete slab, and bridge above the trench. In situ decommissioning of the trench and removal of the bridge above the trench are both within the scope of this FDE. Nothing in the scope of this FDE goes westward beyond the North Cable Trench. No change to the document is proposed.**

- d. Please clearly indicated what portions beyond the boundary of the conduit bridge are not part of this FDE.

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BUILDING 484-5D, D-AREA POWERHOUSE STORAGE BUILDING, REV 1  
BUILDING 483-3D, ELECTRICAL CONTROL BUILDING, REV 1  
BUILDING 484-9D, D-AREA VALVE HOUSE, REV 1**

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**Response: Clarification.**

**The North Cable Trench, is defined as follows in the last paragraph on Page 7 of 14 of the FDE: “To the north of Building 483-3D is a cable trench (Figure 7). The cable trench used to contain many of the electrical cables leaving Building 483-3D to area loads. The cable trench is approximately 75’ long by 6’11” wide and approximately 8’ deep. There were six (6) vertically stacked cable trays running along the south wall of the trench. The cable trench is concrete and has three (3) hinged access plates. Mounted on and above the cable tray is a pipe and conduit bridge of steel construction.” The trench extends from a point abeam the northeast corner of 483-3D westward to a point approximately 12’-6” west of the building’s northwest corner. Figure 7 of the FDE shows the North Cable Trench, its concrete slab, and bridge above the trench. In situ decommissioning of the trench and removal of the bridge above the trench are both within the scope of this FDE. Nothing in the scope of this FDE goes westward beyond the North Cable Trench. No change to the document is proposed.**

- e. Please include a figure that clearly indicates the boundary referenced in the first paragraph text that states, “Note that the scope of this decommissioning ends at the end of the north cable trench concrete slab. This is also the boundary for the conduit bridge that is mounted above the cable trench.” The text is unclear and figure 3 is difficult to see.

**Response: Clarification.**

**Figure 3 shown in the FDE is the best available copy of this sketch. Figure 3 in the original FDE appears to be legible. As described in Response to Specific Comments 5)c. and 5)d., above, The North Cable Trench, is defined**

**FINAL SRS RESPONSES TO EPA COMMENTS ON THE  
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**BUILDING 710-16D, STORAGE BUILDING, REV 1  
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as follows in the last paragraph on Page 7 of 14 of the FDE: “To the north of Building 483-3D is a cable trench (Figure 7). The cable trench used to contain many of the electrical cables leaving Building 483-3D to area loads. The cable trench is approximately 75’ long by 6’11” wide and approximately 8’ deep. There were six (6) vertically stacked cable trays running along the south wall of the trench. The cable trench is concrete and has three (3) hinged access plates. Mounted on and above the cable tray is a pipe and conduit bridge of steel construction.” The trench extends from a point abeam the northeast corner of 483-3D westward to a point approximately 12’-6” west of the building’s northwest corner. Figure 7 of the FDE shows the North Cable Trench, its concrete slab, and bridge above the trench. In situ decommissioning of the trench and removal of the bridge above the trench are both within the scope of this FDE. Nothing in the scope of this FDE goes westward beyond the North Cable Trench. No change to the document is proposed.

**Responsible Party: Ken Blankenship, (803) 952-8612, [john.blankenship@srs.gov](mailto:john.blankenship@srs.gov)**

- 6) Building 483-3D, Electrical Control Building, Page 5 of 14, Figure 3:** – is fuzzy and difficult to see, however, the figure and text clearly indicate that AT2W is beyond the scope of this FDE.
- a.** Please provide a clearer image/figure of Figure 3.

**Response: Clarification.**

**Figure 3 shown in the FDE is the best available copy of this sketch. Figure 3 in the original FDE appears to be legible. No change to the document is proposed.**

**FINAL SRS RESPONSES TO EPA COMMENTS ON THE  
FACILITY DECOMMISSIONING EVALUATIONS (FDEs) FOR:**

**BUILDING 710-16D, STORAGE BUILDING, REV 1  
BUILDING 484-5D, D-AREA POWERHOUSE STORAGE BUILDING, REV 1  
BUILDING 483-3D, ELECTRICAL CONTROL BUILDING, REV 1  
BUILDING 484-9D, D-AREA VALVE HOUSE, REV 1**

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- b. Please indicated North in this figure, it is difficult to determine what transformers are being referenced since the text utilizes directional information and one transformer is not identified in Figure 3.

**Response: Clarification.**

**Figure 2 of the FDE, located directly above Figure 3 on Page 5 of 14, shows a smaller scale depiction of the facility than that shown in Figure 3. Facility orientation is the same in both Figures. Arrows showing both Plant North and True North are shown clearly on Figure 2. All three transformers are shown and identified on Figure 3 (W4 of the west side of 483-3D; AT1W and AT2W on the east side of 483-3D). No change to the document is proposed.**

- c. Please clearly indicate the location of the North Cable Trench (difficult to determine in figure)

**Response: Clarification.**

**As described in Response to Specific Comments 5)c. and 5)d., above, The North Cable Trench, is defined as follows in the last paragraph on Page 7 of 14 of the FDE: “To the north of Building 483-3D is a cable trench (Figure 7). The cable trench used to contain many of the electrical cables leaving Building 483-3D to area loads. The cable trench is approximately 75’ long by 6’11” wide and approximately 8’ deep. There were six (6) vertically stacked cable trays running along the south wall of the trench. The cable trench is concrete and has three (3) hinged access plates. Mounted on and above the cable tray is a pipe and conduit bridge of steel construction.” The trench extends from a point abeam the northeast corner of 483-3D westward to a point approximately 12’-6” west of the building’s northwest corner. Figure 7**

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BUILDING 484-5D, D-AREA POWERHOUSE STORAGE BUILDING, REV 1  
BUILDING 483-3D, ELECTRICAL CONTROL BUILDING, REV 1  
BUILDING 484-9D, D-AREA VALVE HOUSE, REV 1**

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**of the FDE shows the North Cable Trench, its concrete slab, and bridge above the trench. No change to the document is proposed.**

- d. Please indicate if unidentified transformer (maybe W2?) and AT1W are included in this FDE?

**Response: Clarification.**

**No transformers are included in the scope of this FDE. As shown in the FDE, Transformers W4 (located on the building's west side) and AT1W (located on the building's east side near the northeast corner) were previously removed. As stated in the FDE's last paragraph on Page 6 of 14: "On the east side of the structure is one transformer, AT2W (southeast) (Figure 5), still remaining to be removed as a maintenance action outside the decommissioning scope of this FDE." No change to the document is proposed.**

**Responsible Party: Ken Blankenship, (803) 952-8612, [john.blankenship@srs.gov](mailto:john.blankenship@srs.gov)**

- 7) **Building 483-3D, Electrical Control Building, Page 8 of 14, first paragraph:** Please denote the location of the spill control pit in Figure 3 or another figure. It is noted that the spill control pit is beyond the scope of this FDE.

**Response: Clarification.**

**The spill control pump pit is not associated with scope or boundary of the 483-3D FDE. Rather, the spill control pump is within the scope of the 484-D Powerhouse. Only the old spill control motor control center, long since removed, was associated with 483-3D. As stated in the second paragraph on Page 8 of 14 of the FDE: "Figure 9 shows the**

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BUILDING 483-3D, ELECTRICAL CONTROL BUILDING, REV 1  
BUILDING 484-9D, D-AREA VALVE HOUSE, REV 1**

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**location of the old spill control motor control center, which provided power to the spill control pump pit for the 484-D Powerhouse. The spill control pump pit is not applicable to this scope.” No change to the document is proposed.**

- a. As requested, please clearly indicate what portions are NOT included in this FDE, some are clearly noted and not depicted in a figure or are noted by directional information and not depicted in a figure that includes perspective for where the boundaries begin and end for this FDE. EPA notes there are pictures/images of spill control area/transformers, however their location and exactly what portions are NOT included need additional clarity.

**Response: Clarification.**

**Items included in the scope of the 483-3D FDE are: demolition of the 483-3D building, demolition of the ancillary bridgework above the North Cable Trench, and In Situ decommissioning of the ancillary North Cable Trench. No transformers are included in the scope (Reference Response to EPA Comment 6)d. No changes to the documents are proposed.**

**Responsible Party: Ken Blankenship, (803) 952-8612, [john.blankenship@srs.gov](mailto:john.blankenship@srs.gov)**

**8) Building 483-3D, Electrical Control Building, Page 11 of 14, Historical Significance:**

- a. Please include Building 483-3D’s historical significance in this FDE.

**Response: Clarification.**

**The Historical Significance section of the FDE states: “A review has been conducted in accordance with a Programmatic Agreement. This review resulted in the publication of a Cultural Resources Management Plan**

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BUILDING 483-3D, ELECTRICAL CONTROL BUILDING, REV 1  
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**(Reference 4) in which the facilities with historical significance are listed. Building 483-3D is listed as having historical significance in that reference. Mitigating actions will have to be completed as identified in that reference. These actions, along with proper notification to the South Carolina Historical Preservation Office, will be completed prior to initiation of work that significantly alters the physical appearance of the building.” No change to the document is proposed.**

- b. Please include the mitigating actions that will need to be completed for this FDE.**

**Response: Clarification.**

**In 2003 the State Historical Preservation Office (SHPO) “signed off” and is satisfied with the infrastructure Thematic Study and Heavy Water Area Study that handled the photography and narrative, so Building 483-3D can be demolished without any further mitigating action(s). No change to the document is proposed.**

**Responsible Party: Ken Blankenship, (803) 952-8612, [john.blankenship@srs.gov](mailto:john.blankenship@srs.gov)**

