



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

FEB 24 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 the Decommissioning Project Final Reports (DPFRs) for Building 480-3D, Maintenance Field Office and Shop (V-PCOR-D-00062, Revision 0, July 5, 2021), Building 717-3D, D-Area Welding Shop (V-PCOR-D-00063, Revision 0, July 8, 2021), Building 704-7D, D-Area Maintenance Building (V-PCOR-D-00064, Revision 0, July 12, 2021), Building 710-16D, Storage Building (V-PCOR-D-00065, Revision 0, July 8, 2021) and Buildings 485-D and 482-2D, D-Area Cooling Tower and Switchgear Building (V-PCOR-D-00061, Revision 0, November 2, 2021)

The U. S. Department of Energy is submitting the subject comment responses and document for your review and approval. The Savannah River Site (SRS) submitted the Decommissioning Project Final Reports (DPFRs) for Building 480-3D, Maintenance Field Office and Shop (V-PCOR-D-00062, Revision 0, July 5, 2021), Building 717-3D, D-Area Welding Shop (V-PCOR-D-00063, Revision 0, July 8, 2021), Building 704-7D, D-Area Maintenance Building (V-PCOR-D-00064, Revision 0, July 12, 2021), and Building 710-16D, Storage Building (V-PCOR-D-00065, Revision 0, July 8, 2021) on August 24, 2021. The SRS submitted the DPFR for Buildings 485-D and 482-2D, D-Area Cooling Tower and Switchgear Building (V-PCOR-D-00061, Revision 0, November 2, 2021) on November 30, 2021.

The South Carolina Department of Health and Environmental Control (SCDHEC) approved the DPFRs for Buildings 480-3D, 717-3D, and 710-16D on October 22, 2021 and the DPFR for Buildings 485-D and 482-2D on February 2, 2022. The SCDHEC provided a comment on the DPFR for Building 704-7D on October 22, 2021. The U. S. Environmental Protection Agency (EPA) provided comments on all DPFRs on January 4, 2022.

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The SRS' responses to SCDHEC's and EPA's comments are attached for your review. As noted in the responses to EPA's comments, the SRS will revise the D&D Protocol to remove the reference to providing cost and performance information in Simple Model and Integrated Sampling Model DPFRs. This revision as well as editorial changes to the D&D Protocol will be made upon SCDHEC's and EPA's approval of the subject information. The revised D&D Protocol will be submitted to SCDHEC and EPA via email for your files.

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.

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: 2022.02.23 15:23:18 -05'00'

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

IACD-22-131

Enclosures:

1. Savannah River Site Responses to 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
2. SRS Response to South Carolina Department of Health and Environmental Control (SCDHEC) Comment on the Decommissioning Project Final Report (DPFR): D-Area Maintenance Building, Building 704-7D, V-POCR-D-00064, Revision 0, July 12, 2021

Ms. Susan Fulmer
Mr. Jon Richards

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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. 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
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

Response: Clarification

The requirement in the D&D Protocol to provide the cost and performance information in DPFRs is in error. The required level of cost control rigor and record keeping is much more stringent for large projects, typical of CERCLA Model projects, than for smaller projects, typical of Simple Model and Integrated Sampling Model projects. As a result, SRS systems are not able to provide cost details in a timeframe to support timely D&D Simple Model or Integrated Sampling Model project closeout and DPFR development. Instead, Removal Action Reports (the DPFR equivalent for CERCLA Model facility decommissioning projects) will report cost and performance. SRS will revise the D&D Protocol accordingly. The protocol revision will also include a correction to the title of FFA Appendix K.2 from *D&D Facilities (or remnants) that Require No Further Action* to *D&D Facilities (or remnants) that Require No Further Evaluation*. No changes to the DPFR are proposed.

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

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ON THE DEPARTMENT OF ENERGY, SAVANNAH RIVER (DOE-SRS)
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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.

Response: Clarification.

The Cooling Tower Basin and Pump Basin were verified to be free of equipment, structure, rubble, waste, and debris. Although the Cooling Tower Basin is open to the atmosphere, precipitation will not collect in the basin since there are two 6-inch drain lines located on the south wall of the basin which allow water to drain into the process sewer system. Leaving the Cooling Tower Basin open to the atmosphere and a void space below the Pump Basin is an acceptable practice when there is no driver for a cover because of residual contaminants or safety concerns due to personnel traffic. The remaining structures are free of physical, chemical, and radiological hazards and therefore need no further D&D activities. No change to the document is proposed.

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

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

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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.”

Response: Clarification.

The wording in Section 1.0 and Section 6.02 is as prescribed by the Decommissioning Project Final Report template agreed upon by SRNS, DOE, SCDHEC and EPA. No chemical 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). The facility’s FDE, G-FDE-D-00050, Rev. 0, concluded that no final verification survey was warranted because of the nature of the chemicals used, the history of the facility, and current facility conditions. No contradicting information was discovered during/after decommissioning. Demolition and removal activities of the Simple Model facility provided no mechanism for contaminating the slab. No change to the document is proposed.

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

- 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.

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DPFR 717-3D, D-AREA WELDING SHOP, DATED 7-8-21
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Response: Clarification.

The 7'1" and 7'3" basin wall heights include both the above and below grade portions of the walls (i.e., total wall heights). Therefore, as stated in the FDE and DPFR, a 3'0" portion of the basin walls is above grade, leaving 4'1" and 4'3" below grade. The 3'0" above grade portions served as the concrete walls for the 485-D structure and were not demolished to grade when the structure was removed. No change to the document is proposed.

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

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.

Response: Clarification.

Various field walk downs were performed with SRS stakeholders involved in the D&D work such as Department of Energy, Environmental Compliance Authorities, Generator Certification Officials, Cost Account Manager, Industrial Hygiene, and EC&ACP Engineering. 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. Walk downs with EPA and SCDHEC were not performed due to COVID-19 travel restrictions. No change to the document is proposed.

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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.

Response: Clarification.

See response to EPA General Comments: DPFR 485-D and 482-2D, Cooling Tower, Dated 11-2-21, Comment 1. No change to the document is proposed.

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

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.

Response: Clarification.

As mentioned in the FDE, G-FDE-D-00046, Rev. 1, the stain located within Storage 8 appears to be a petroleum oil-based stain, but the source of the spill is unknown. Building 710-16D was a storage building for the 484-D Powerhouse area. The facility was a storage area for various non-hazardous, packaged chemicals. No chemical or

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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). Review of the area's chemical inventory does not indicate presence of any hazardous materials stored in 710-16D and no hazardous materials storage areas were demarked in the building, indicating that the source of the spill was non-hazardous. No change to the document is proposed.

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

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.

Response: Clarification.

See response to EPA General Comments: DPFR 710-16D Storage Building, Dated 7-8-21, Comment 2. No change to the document is proposed.

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

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).

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Response: Clarification.

Building 710-16D was a wood frame structure on a concrete foundation with concrete curbing surrounding the perimeter. The concrete foundation was not a slab, with only some interior concrete flooring extending inwards beyond the structure walls. The remaining floor space was natural dirt which would allow for drainage. Cleaving/breaching remaining curbing on slabs, at as many locations as necessary, is a typical practice during decommissioning to ensure drainage of rainwater. No change to the document is proposed.

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

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.

Response: Clarification.

See response to EPA Specific Comments: DPFR 485-D and 482-2D, Cooling Tower, Dated 11-2-21, Comment 3. No change to the document is proposed.

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

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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.

Response: Clarification.

See response to EPA General Comments: DPFR 485-D and 482-2D, Cooling Tower, Dated 11-2-21, Comment 1. No change to the document is proposed.

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

**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.”

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Response: Clarification.

See response to EPA Specific Comments: DPFR 485-D and 482-2D, Cooling Tower, Dated 11-2-21, Comment 1. No change to the document is proposed.

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

- 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.

Response: Clarification.

See response to EPA Specific Comments: DPFR 485-D and 482-2D, Cooling Tower, Dated 11-2-21, Comment 3. No change to the document is proposed.

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

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

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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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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.

Response: Clarification.

See response to EPA General Comments: DPFR 485-D and 482-2D, Cooling Tower, Dated 11-2-21, Comment 1. No change to the document is proposed.

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

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.

Response: Clarification.

All floor openings including the sump located on the south end of the concrete slab were filled with grout. The sump grate was removed and disposed of in accordance with established SRS waste practices. No change to the document is proposed.

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

**SRS RESPONSES TO
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
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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.”

Response: Clarification.

See response to EPA Specific Comments: DPFR 485-D and 482-2D, Cooling Tower, Dated 11-2-21, Comment 1. No change to the document is proposed.

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

- 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.

Response: Clarification.

See response to EPA Specific Comments: DPFR 485-D and 482-2D, Cooling Tower, Dated 11-2-21, Comment 3. No change to the document is proposed.

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

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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 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.

Response: Clarification.

See response to EPA General Comments: DPFR 485-D and 482-2D, Cooling Tower, Dated 11-2-21, Comment 1. No change to the document is proposed.

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

**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.”

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Response: Clarification.

See response to EPA Specific Comments: DPFR 485-D and 482-2D, Cooling Tower, Dated 11-2-21, Comment 1. No change to the document is proposed.

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

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.

Response: Clarification.

In the original construction the siding, roof, and interior walls were made of corrugated asbestos. The interior walls were replaced with drywall. In Revision 0 of Reference 8.02, the exterior siding and roof are noted as asbestos containing materials. Prior to demolition and Revision 1 of Reference 8.02, the asbestos siding and roof, as well as the interior drywall were removed by the asbestos abatement contractor per G-SOW-D-00009, the SOW for the Abatement of Asbestos Containing Materials in D-Area Buildings 480-3D, 482-2D, 484-4D, 485-D, and 704-7D. The original siding and roof were not present during the Revision 1 of Reference 8.02 inspection. No change to the document is proposed.

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

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-

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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.

Response: Clarification.

See response to EPA Specific Comments: DPFR 485-D and 482-2D, Cooling Tower, Dated 11-2-21, Comment 3. No change to the document is proposed.

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

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SCDHEC COMMENT

- 1) SCDHEC requests the Department of Energy (DOE) revise the document, as it contains numerous incorrect references to a remaining slab, remaining structure and facility remnant(s).

Response: Clarification

Building 704-7D did not have a concrete slab; the building sat on concrete footings. Demolition uncovered no new information that contradicted the FDE (G-FDE-D-00045, Rev. 0) justification for not requiring a final verification survey (i.e., there was no evidence of contamination in the structure and no evidence of radioactive or hazardous material processing that could have provided a source of contamination). The building was demolished to grade. There is no remaining slab, structure, or facility remnant. No change to the document is proposed.

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