



ENVIRONMENTAL COMPLIANCE &

December 19, 2022

DEC 19 2022

Mr. Brian T. Hennessey, SRS Remedial Project Manager
Infrastructure and Area Completion Division
U. S. Department of Energy
Savannah River Operations Office
Post Office Box A
Aiken, South Carolina 29802

AREA COMPLETION PROJECTS

Re: Federal Facility Agreement Revision 0 Appendix E, Long-Term Projections for Fiscal Year 2023
(Print Date: 10/26/22) dated November 15, 2022 and received November 22, 2022.

Dear Mr. Hennessey:

The Department has completed its review of the above referenced Appendix E to the Savannah River Site (SRS) Federal Facility Agreement (FFA).

The positive work completed under the SRS FFA has made this one of the most successful agreements within the Department of Energy complex. While we are aware that ongoing missions will delay completion of cleanup to 2065, the Department continues to expect every effort will be made to maintain progress at the site in a timely manner that is protective of human health and the environment. The Department requests an evaluation be completed in the upcoming year to identify any projects that can be incorporated into the E.1 and E.2 timeframes. Further, the Department encourages the Savannah River Operations Office to seek appropriate funding levels to fully implement Appendix E and accelerate the schedule where possible.

In addition to the concerns noted in this cover letter, the Department requests the attached comments be addressed in the Revision 1 of FY2023 Appendix E document.

If you have any questions, please contact me at (803) 898-4331.

Sincerely,

Susan B. Fulmer Digitally signed by Susan B. Fulmer
Date: 2022.12.19 13:30:57 -05'00'

Susan B. Fulmer, P.G., Manager
Federal Remediation Section
Division of Site Assessment, Remediation, and Revitalization
Bureau of Land and Waste Management

Mr. Hennessey
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cc: C. L. Bergren, SRNS-ACP (Signed Original)
Jon Richards, EPA Region IV
Myra Reece, Environmental Affairs
Henry Porter, SCDHEC-BLWM
G. Ken Taylor, SCDHEC-BLWM
R. Gary Stewart, SCDHEC-BLWM
Travis Fuss, Aiken Environmental Affairs Office
Heather Cathcart, SCDHEC-BLWM

South Carolina Department of Health & Environmental Control Comment on:
Federal Facility Agreement Revision 0 Appendix E, Long-Term Projections for Fiscal Year 2023
(Print Date: 10/26/22) dated November 15, 2022 and received November 22, 2022.

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General Comments

1. The schedule outlined in Appendix E contains a completion date of 2065 due to continuing missions at the Savannah River Site (SRS); however, the latter years of the schedule continue to contain a significant volume of work to be completed to meet this commitment. The Department is concerned that extending the Area Completion activities out jeopardizes the goals established in the Comprehensive Cleanup Plan and Letter of Support, as well as the overall accelerated cleanup vision for the SRS. The extremely heavy ramping up of work scheduled for the end of the SRS lifecycle may not be achievable from a budget or personnel perspective.
2. As you are aware, DOE, SCDHEC, and EPA have been engaged in milestone discussions for the High-Level Waste Tanks (HLWT), and the three parties have tentatively agreed to a new schedule. Once the new HLWT Milestone Agreement has been fully executed, the agreed upon milestones should be incorporated into the Revision 1 Appendix E, as appropriate. The Department is encouraged by DOE's commitment to close all fifty-one tanks by 2037. Strong efforts should be made by DOE to ensure adequate funding is provided so that this commitment is met.
3. The Department encourages DOE to take the proper steps to obtain funding for the phased removal action approach for the F-Area Material Storage Building (235-F). According to the September 22, 2022 SRS InSite news article ("SRS Completes Deactivation in Building Used to Produce Fuel for Space Program"), decommissioning will be a multi-year project that is planned to commence in FY2023. The budget for the decommissioning of this facility is substantial and measures for preparing for this expense should be considered. Any CERCLA related documents pertaining to this removal action should be placed on Appendix E as appropriate.
4. The Department is looking forward to the Core Team meeting to discuss the modeling results on the C-Area Moderator water and its path forward for in-situ decommissioning in the C-Area Reactor Complex. The Department asks that DOE begin to process for obtaining funding for this early action to support C-Area Reactor Complex closure.