



SC DEPARTMENT of
**ENVIRONMENTAL
SERVICES**

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206 Beaufort St. NE
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November 22, 2024

ENVIRONMENTAL COMPLIANCE &

Ms. Avery G. Hammett, SRS Remedial Project Manager
Remediation and Deactivation & Decommissioning Division
U. S. Department of Energy
Savannah River Operations Office
Post Office Box A
Aiken, South Carolina 29802

DEC - 2 2024

AREA COMPLETION PROJECTS

Re: Decommissioning Project Final Report 236-H, By Product Purification Facility (V-PCOR-H-00016, Revision 0, September 9, 2024) received September 23, 2024.

Dear Ms. Hammett:

The South Carolina Department of Environmental Services (SCDES) has reviewed the above referenced document with respect to the Memorandum of Agreement for Achieving an Accelerated Cleanup Vision for the Savannah River Site. As a result of this review, the Department has generated the attached comments. These comments must be addressed prior to final approval of the above referenced document. The appropriate technical staff will be available to participate in a joint DOE/EPA/SCDES comment resolution meeting to discuss these comments, if necessary.

To schedule a meeting to resolve these comments or to obtain further information, please contact me at (803) 508-7615.

Sincerely,

A handwritten signature in blue ink that reads "Gregory N. O'Quinn".

Gregory N. O'Quinn, Manager
Federal Facilities Agreement
Midlands Aiken Office
Environmental Affairs

cc: C. L. Bergren, SRNS-ACP (Signed Original)
Jon Richards, EPA Region IV
Susan Fulmer, SCDES Bureau of Land and Waste Management, Federal
Remediation Section

South Carolina Department of Environmental Services Comments on:
Decommissioning Project Final Report 236-H by Product Purification Facility (V-PCOR-H-00016,
Revision 0, September 9, 2024) received September 23, 2024.

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General Comments

1. Section 1.0, Summary, page 7. Sentence 4 in paragraph 2 states “the Core Team agreed on August 17, 2023, that, in lieu of the final verification survey, the slab shall be protected from cross contamination during decommissioning and a post-decommissioning radiological survey shall be performed”. The last sentence of paragraph 2 states that a post decommissioning radiological survey was conducted and is referenced as 8.02. In the References section, 8.02 is listed as TRIT-M-20240530-6, Rev. 0, dated May 30, 2024, “236-H Monthly Survey”. Additionally, sentence 4 in paragraph 3 states “No final verification survey was required per the previously mentioned Core Team agreement”. Sentence 5 in paragraph 3 references a Final Acceptance Inspection (FAI)-51 as Reference 8.09 that was performed on June 20, 2024. Further, section 6.02, Risk Assessment Summary, sentence 2 reiterates a final radiological survey would be required in lieu of a final verification survey. Sentence 3 states the final radiological survey resulted in <1000 disintegrations per minute (dpm) per 100 squared centimeters (dpm/100 cm²) and <1E-5 microcuries per cubic centimeter (μCi/cc) of tritium remaining. While the Department acknowledges the Core Team agreement of a radiological survey in lieu of a verification survey, it is unclear as to which of these references (8.02, 236-H Monthly Survey or 8.09, FAI-51) is applicable to the radiological survey that was conducted in place of the verification survey. The Department is requesting clarification on the applicable reference as well as the opportunity to review these referenced documents and their associated results.
2. Section 3.0 discusses the steps taken regarding the Decommissioning Model Approval. The information within this section begins with the submittal and concurrence of the Facility Decommissioning Evaluation (FDE), continues with a discussion of a Pre-Decommissioning Characterization Scoping Meeting with the Core Team, and references throughout the section any associated walkdowns and Core Team agreements throughout the process. However, the information seems to be out of sequence. The Department is requesting this section be rewritten to outline the respective and appropriate sequence of events beginning with the FDE concurrence through the Scoping Meeting and regarding any applicable requests for walkdowns that were agreed on as part of the FDE concurrence and Core Team agreements.

Specific Comment

1. Table B-1, Chemical Parameters Used, pages 61-63 and Table B-3, Tier I Screening Results, pages 65-67. The following six analytes listed in Appendix B tables on pages 28-30 and also in Table C-1 are not listed in Table B-3 for the CM Evaluation: iron, potassium, sodium, bismuth-212, bismuth-214, and lead-214. Only one of these analytes, iron, is listed in Table B-1. It should be noted that all of these analytes are included in the HH and PTSM evaluation tables (Tables A-1 and A-2). These tables should be revised to include all of these analytes, or else Sections 6.02.02 and Appendix B Section B.1 should be revised to provide an explanation for not including them.