



OAK RIDGE RESERVATION

Environmental Management

March 12, 1999

Mr. Rod Nelson
Assistant Manager for
Environmental Management
U.S. DOE/ORO
P.O. Box 2001, EM-90
Oak Ridge, TN 37831

**COMMENTS ON DRAFT ENVIRONMENTAL ASSESSMENT FOR THE
U.S. DEPARTMENT OF ENERGY, OAK RIDGE OPERATIONS RECEIPT AND
STORAGE OF URANIUM MATERIALS FROM THE FERNALD ENVIRONMENTAL
MANAGEMENT PROJECT SITE (DOE/ORO-2078)**

Dear Mr. Nelson:

The Oak Ridge Reservation Environmental Management Site Specific Advisory Board approved the enclosed comments on the *Draft Environmental Assessment for the U.S. Department of Energy, Oak Ridge Operations Receipt and Storage of Uranium Materials from the Fernald Environmental Management Project Site* at our March 10, 1999 Board meeting.

We look forward to your written response to our comments.

Sincerely,

William M. Pardue, Chair

WMP/sb

Enclosure



Oak Ridge Reservation Environmental Management Site Specific Advisory Board

Comments on Draft Environmental Assessment for U.S. Department of Energy, Oak Ridge Operations Receipt and Storage of Uranium Materials from the Fernald Environmental Management Project Site

In analyzing the relative appropriateness of Oak Ridge Operations (ORO) for the receipt and storage of uranium materials from the Fernald Environmental Management Project Site:

- The distance from Poplar Creek to prospective storage sites at East Tennessee Technology Park (ETTP) is discussed, but the elevation above creek level and flooding history were not mentioned.
- No information is given on the average isotopic composition of the depleted uranium (U) present. If the U has nearly natural composition, then the material could compete as feed for gaseous diffusion. If it has the 0.3 or 0.4% U-235 content usual for depleted uranium, the likelihood of sale in the near future may be small.
- How did this project become such an emergency that work must be completed this year, with the result that stakeholders are prevented from having the opportunity for meaningful input?
- Why did DOE-ORO agree to accept the material before the EA was made available?
- It appears that the facility at Portsmouth is a more appropriate site for storage:
- An appropriate site at Portsmouth (X-3002) has been identified where the material can be accommodated.
- Storage of this material is consistent with the Portsmouth mission; it is inconsistent with the current mission at ETTP.
- At Portsmouth, the material will stay within the same regulatory framework as at present.
- The State of Tennessee (TDEC) has reached agreement with DOE to remove stores of depleted uranium hexafluoride from ETTP within the next ten years. There is little sense in shipping a supply of a different fluoride to Tennessee in the near future.