



*Many Voices Working for the Community*

# Oak Ridge Site Specific Advisory Board

October 12, 2000

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**Subject: ORSSAB's Review of DOE/OR/01-1795&D3: Proposed Plan for Interim Actions in Bethel Valley, Oak Ridge, Tennessee, May 2000**

Various members of the Oak Ridge Site Specific Advisory Board (ORSSAB) have reviewed the subject document. Comments that were considered and approved by the Board at its October 11, 2000 meeting are attached.

Overall, we think the Proposed Plan is a well-written document. The numerous professionals who contributed to this creditable work should be commended.

Sincerely,

Luther V. Gibson, Jr.  
Chair

Attachment



**Oak Ridge Site Specific Advisory Board Comments  
on the Proposed Plan for Interim Actions in  
Bethel Valley, Oak Ridge, Tennessee  
DOE/OR/01-1795&D3, May 2000**

**General Comments**

- (1) In general, most reviewers found that the Proposed Plan (PP) adequately describes the strategic decisions required as remediation proceeds. When used in conjunction with the RI/FS, it explains the alternatives well enough to allow thoughtful decisions and it reflects input received from the public at meetings and from informal reviews of preceding documents.
- (2) Several reviewers suggested that a basic flow chart of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process would assist in understanding the schedule and sequence of activities and decisions for the watershed approach to decision making.
- (3) SSAB reviewers recognize that DOE O 451.1A (National Environmental Policy Act Compliance Program; approved 06/05/97) requires only that certain NEPA values (i.e., analysis of cumulative, off-site ecological and socioeconomic impacts) be incorporated, to the extent practicable, in DOE CERCLA documents. These NEPA values are meant to supplement the required CERCLA evaluation criteria. We find the PP discussion of the issues and concerns previously identified in the RI/FS as NEPA values to be consistent with the findings stated in the RI/FS.

**Specific Comments**

- (1) Page 2: Recommend the addition of the "Feasibility Study DOE/OR/01-1748/V1&V2&D2" to the list of References.
- (2) Page 3, Figure 1. The ORR is entirely within the City of Oak Ridge. Recommend that the map be revised to clearly show the complete city boundary, the Reservation boundary, and the residential and commercial areas of Oak Ridge.
- (3) Page 4, Figure 2. Recommend that the 1000 area be shown on the map.
- (4) Recommend that the "Land Use Control Assurance Plan" be added to the list of References.
- (5) Recommend that the following be added to the Glossary: Land Use Control (LUC), Land Use Control Assurance Plan (LUCAP), and Land Use Control Implementation Plan (LUCIP).
- (6) Page 8. Recommend that First Creek and Fifth Creek be shown on Figure 2 and also on

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Figure 3. The Core Hole 8 Plume should also be included on Figure 3. A heavy line similar to the Gunit tanks line would be appropriate.

- (7) Page 11, second column, Lines 21-24. While surface waters are classified by the State for the listed uses, text could be added to the ROD describing the existing restrictions on such uses on the ORR. (e.g., access, fencing, guards, signage).
- (8) Line 51. The A7500 Bridge@ on Figure 3 should be identified or, if not possible on Figure 3, then on Figure 2.
- (9) Page 18, RAO 2. WAG 3, southeast of the junction of State Route 95 and Bethel Valley Road, lies at the heart of a large rather clean area that offers good sites for future development. Groundwater plumes from buried waste may inhibit such plans. If the cap and diversion trench that are planned do not halt the plume, excavation far in the future will be less effective than doing it now. Some additional text could be added to the ROD to address this concern.
- (10) Page 19 (alternative c-1-No Action) and page 20 (Alternative w-1-No Action). The no-action alternative seems ambiguous in DOE CERCLA documents. Does it mean cessation of existing protective procedures as suggested in this document? Or does it mean not proceeding with any of the other alternatives? If the former, chances are it would not be allowed by the regulators. For purposes of comparison of alternatives, the current status should be the baseline.
- (11) Page 19 (top of 2<sup>nd</sup> column). Suggest that ATable B.3.@ be added to Aa and b@(a and b; Table B.3) also on pages 20 and 21. Readers need to know where Aa and b@ can be found.
- (12) Page 25 (top of 2<sup>nd</sup> column); also page 29 (bottom of 1<sup>st</sup> column). The preferred alternative for bedding around waste lines needs a clearer explanation. We assume the preferred alternative includes grouting radwaste lines, but not the gravel fill around these lines A. . . unless they are judged to be conduits that would speed the dispersion of contaminated groundwater.@ The discussion given by staff at the public hearing of remediation plans for trenches containing the grouted waste lines was sensible and far more cogent. The ideas conveyed in that discussion need to be stated in the ROD to indicate the planned criteria for various remedial actions related to these trenches.
- (13) Page 25 (2<sup>nd</sup> column, 3<sup>rd</sup> paragraph). Perhaps some Afixed@ contamination under paint should be removed during D&D. Before backfilling at the end of Decontamination and Demolition, building basements are to have loose contamination removed. Contamination under paint would be considered Afixed@ under the preferred alternative. We assume buried basements will lose their paint after a few years, freeing some of the contamination. Portions of some buildings probably have walls that have been given many coats of surface treatment to Ahide@ alpha-particle emitting contaminants. For such buildings, We believe it would be appropriate to grind these surfaces while they are accessible. This would require sampling walls and floor of at least one radiochemical laboratory that was in a basement, to determine any need to remove fixed contaminants.

- (14) Page 29. Fifty years from now, the Oak Ridge National Laboratory soil surface under the preferred alternative would be usable, with 50 old buildings buried under a couple of feet, and surface warm spots ten times more radioactive than the average. While it is true that workers usually move around and tend to receive an average exposure, how would ORO plan to keep track of the location of these warm spots so workers will not loiter there? Signage for these spots would be a problem for generations. We think the maximum ratio of surface radioactivity in warm areas to average should be much smaller. The savings in the present proposal would be only in the short term. We suggest that the average present contamination be figured over regions no larger than an acre, so one may be confident that a worker would rarely spend his day in an area that retains a higher specific activity than the selected objectives. We also suggest that square-yard areas with above-average radioactivity exhibit an intensity no more than four times the average stated as the objective, so that even the maximum value would still be within the range of standards presently being proposed.

While the above suggestion would increase the initial remediation cost, we believe the Remedial Action Objective would then be met during practical future use of the site. With the preferred alternative interpreted as in the PP, we doubt the clean surface objective would be satisfied.

- (15) Page 36. In Table 8, the discount or interest rate assumed for the present worth calculation is not apparent.
- (16) Page 40. It is recognized that the manner of waste burial in WAG 3, with some concrete caps, discourages excavation. If the portions of the waste most likely to impede future uses of the site could be identified, a partial excavation might be warranted. Consideration should be given to adding a discussion of this issue to the ROD. If the current preferred alternative is maintained, the planned water diversion trench should be cut deeply enough to intercept all up gradient groundwater that could reach the difficult waste.
- (17) Pages 44-45. Commitment to Stewardship

While the DOE presentation at the public hearing indicated that stewardship issues would not be covered in the current interim ROD, the PP does include sections directly relevant to stewardship, including those on long term effectiveness of the remedies, LUCs, and the federal commitment to stewardship of the site. Since it is not really known that a Final ROD will occur, and the preferred alternatives will often require ongoing stewardship activities, ORSSAB believes the Bethel Valley interim ROD should cover the general principles that guarantee effective stewardship. The following paragraphs provide some detail for this request.

- (1) Clarity is needed that maintenance of remedial structures and land use control activities are included at least for the period until a final ROD is adopted.
- (2) Maintenance of caps, trenches, and treatment facilities is described as a continuing activity, with no indications of criteria for adequacy or what the word continuing

means in context. The ROD must be explicit on this matter.

- (3) LUCs are briefly listed, with reference to the LUCAP. (Paragraph 2.5 of that LUCAP states that the Proposed Plan and ROD must contain an adequate description of the land use controls along with conditions for their use to allow evaluation of each land use control under remedy selection criteria contained in CERCLA and the NCP.) The various types of land use controls are listed only by title in the PP. The ROD should at least meet the requirements of the LUCAP in this matter.
  
- (18) Other essential stewardship activities that will need to be carried out during the interim remediation should be listed in the ROD. The important record keeping, public education, and surveillance functions should be listed in the ROD. There is concern that ongoing activities not specifically mentioned in a ROD will not endure, and this PP would be the public's only opportunity to comment on the remediation program for Bethel Valley. At a minimum, we believe the following points should be included in the ROD:
  - (1) The essential classes of records to be maintained should be listed,
  - (2) A public education program should be specified to include at least a public annual progress meeting (that could also include other areas of the Reservation).
  - (3) The aspects of Bethel Valley remediation that will require routine surveillance should be listed.
  
- (19) Public participation in CERCLA five-year reviews.

The Federal Facility Agreement for the ORR does not address public involvement in the five-year reviews required at sites where remedial actions result in contaminants remaining above levels that allow for unlimited use. Thus, we recommend the ROD include the following provisions for public involvement:

- (1) public notice of forthcoming five-year reviews and invitations to participate extended to interested citizens, community groups, and local government;
- (2) public meetings to provide stakeholders with information about remedial activities subject to the five-year reviews, to explain the five-year review process, and to gather community issues and concerns related to forthcoming five-year reviews;
- (3) site visits;
- (4) public review and comment periods for draft five-year review reports;
- (5) public notice of final five year review reports and the location of their availability;
- (6) distribution of summary fact sheets to all individuals and groups who participate in the five-year review process.